

**CORPORATE SOCIAL RESPONSIBILITY
(‘CSR’) POLICY
OF
Barclays Bank Plc, India Branch**

Policy Governance	
Policy Owner(s)	Barclays Citizenship Function
Policy Approver(s)	Executive Committee of Barclays Bank Plc, India Branch
Version	4.0
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Barclays Bank PLC – India Branch CSR Policy

1.0 Background

1. Barclays is a major global financial services provider engaged in personal banking, credit cards, corporate and investment banking, and wealth and investment management.
2. Barclays aims at conducting its business in a way that is sustainable, facilitating greater and more inclusive prosperity for current and future generations.

2.0 Title and Applicability

1. Barclays Bank PLC – India Branch (Bank) has developed this Policy titled ‘Barclays CSR Policy’ (‘Policy’) encompassing the Bank’s philosophy for being a responsible corporate citizen and lays down the principles and mechanisms for undertaking various programmes in accordance with section 135 of the Companies Act, 2013 (‘the Act’) and the relevant rules made there under for the community at large .
2. The Policy shall guide the CSR programmes and activities undertaken by the Bank in the communities in which it operates.

3.0 CSR Vision Statement

Barclays vision is to help people achieve their ambitions – in the right way by playing a broader role in the communities in which we live and work beyond what we deliver through core business activities. We do this through community investment programmes and the direct efforts of our colleagues. By aligning our community investment strategy to our skills and experience as a bank, the positive impact of our activity is much more than just a financial contribution

4.0 Review of CSR Policy

The Executive Committee in India shall review the CSR policy and may amend as may be required.

5.0 CSR Programme Areas & Objectives

The Bank is committed to play a broader role in the communities in which it operates by way of supporting various initiatives through funding, fund raising and/or volunteering activities. In order to achieve its goal, the bank will intervene in the area of Skilling through its Connect with Work Programme:

Connect with Work (CwW): 70% of the total population in India is below 35 years according to the 2011 census making India number one in terms of youth population in the world. The youth is the country’s greatest resource as they would be the demand drivers and hence the economy drivers when they enter and progress as the work force. However, the youth unemployment rates have been consistently increasing over the years. A mismatch between the skills acquired by youth and the skills required by industry is a major cause of low employability among Indian youth. Major hindrances to building skills include poverty, the poor quality of mainstream education, limited

access to and capacity of current vocational education training, a lack of focus on skills required in the current job market, and a poor enabling environment with deep systemic challenges. If these factors are not addressed, India's youth will continue to suffer from a skills deficit, hindering not only their ability to gain employment and move out of poverty but further constraining national growth.

Objective:

The Bank intends to provide employment enhancing training to students to help them be job-ready. This will help the beneficiaries in improving their employability and improve their prospects economically. The programme will also have a positive impact on the confidence of the young beneficiaries and enhance their ability to face various challenges in life.

01. **Any other programme or project in areas enumerated in Schedule VII:** The Company may undertake any other project or programme in areas listed as per the provisions of Schedule VII referred in the section 135 of the Act.

6.0 CSR Budget

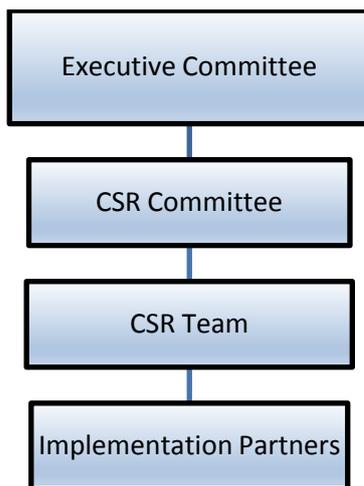
1. The Bank's Executive Committee in India shall endeavor that the Company spends, in every financial year, at least 2% of the average net profit ("net profit" shall not include such sums as may be prescribed, and shall be calculated in accordance with the provisions of section 198 of the Act) made during the immediate three preceding financial years.
2. Any surplus arising out of CSR activities shall not form part of the business profit of the Company and shall be utilized only for CSR purposes.
3. The Bank may collaborate or pool resources with group companies, other organizations or companies to undertake CSR activities in such a manner that the respective companies are in a position to report separately on such projects or programs in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time.

7.0 Implementation process

- ❖ CSR programme will be undertaken by the bank within the defined ambit of Base Line Survey and Need Assessment.
- ❖ The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the program.
- ❖ The Bank may enter into partnerships with the government, civil society and communities to create multiplier effect of its social projects.
- ❖ The mode of implementation of CSR programmes will include a combination of direct implementation and implementation through own foundation, NGOs, business partners, civil society, registered societies etc. The Bank will select its partners after appropriate due diligence.

- ❖ The mode of implementation will also include employee volunteering. The Barclays' employee volunteering will involve the company's employees in the community initiatives it undertakes and help them contribute towards the society.
- ❖ The Bank will use services of expert agencies, consultancy firms etc. wherever required for carrying out base line surveys, guidance on project design and implementation, impact assessment surveys etc.

8.0 CSR Governance Structure



9.0 Roles and responsibilities

The Executive Committee

The Executive Committee of the Company in India will be responsible for:

- ❖ approval of the CSR Policy of the Bank including any revisions thereof, after taking into account the recommendations made by the CSR Committee.
- ❖ Disclosing the content of the Policy in its report and placing the Policy on the Company's website in such manner as prescribed under Section 135 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 ('CSR Rules') and any amendments to the Act/Rules thereto
- ❖ Ensuring that the projects included in the Policy are undertaken by the Company
- ❖ Ensuring that the Company endeavors to spend, in every financial year, atleast 2% of the average net profits of the Company ("net profit" shall not include such sums as may be prescribed, and shall be calculated in accordance with the provisions of Section 198 of the Act) made during the three immediately preceding financial years in pursuance of the Policy. Ensuring that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects
- ❖ Ensuring that it specifies the reasons in the balance sheet filed with the Registrar for not spending the allocated amount in case the Company fails to spend such amount

9.1 CSR Committee:

Composition of the the CSR committee: The Executive Committee shall have the power to make any change(s) in the constitution of the Committee.

Responsibility of the CSR Committee:

- ❖ Development and consistent execution of the formulated CSR policy ensuring alignment with the global citizenship strategy and enhanced reputational impact.
 - ❖ Formulate and recommend the CSR Policy to the Executive Committee in India for approval (including any modifications to the CSR Policy as may be required) which shall indicate the activities to be undertaken by the Company in areas or subjects specified in Schedule VII to the Act..
- ❖ Monitor the implementation of the CSR Policy from time to time and recommend changes to the Executive Committee
- ❖ recommend CSR projects, which are in line with the activities specified in Schedule VII, to be undertaken by the Company
- ❖ recommend the amount of expenditure to be incurred on CSR projects

9.2 CSR Team:

1. **Composition of the the CSR Team:** The Bank may appoint a CSR team consisting of requisite number of persons as deemed appropriate to undertake its CSR activities on an on-going basis.
2. **Responsibility of the CSR Team:**
 - ❖ The Team will be responsible for on ground assessment of the project(s), coordination with the NGOs and stakeholders
 - ❖ The Team will be responsible for timely execution and monitoring of the projects.
 - ❖ The Team will ensure all background research work and engage with stakeholders either directly or indirectly and prepare project plan for new CSR projects.
 - ❖ The Team will plan annual budgets for CSR projects in coordination with the implementing partners and make a proposal to the CSR Committee
 - ❖ The Team will report to the CSR Committee on the progress on CSR projects and status of CSR expenditure at least two times in a year but is not precluded from meeting more frequently if required. The Team will be responsible for documentation and reporting of all CSR activities of the Bank in pursuit of the Act and the CSR Rules

10.0 Monitoring and Reporting Framework

Project Monitoring:

The Bank will institute a well-defined monitoring and evaluation mechanism to ensure that each CSR programme has:

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1. clear objectives developed out of the societal needs that are determined through baselines studies and research
2. clear targets, time lines and measureable parameters wherever possible
3. a progress monitoring and reporting framework that is aligned with the requirements of the section 135 of the Act and the CSR Rules

The CSR progress monitoring authorities and the frequency of review is given below.

S. No.	CSR Progress Review and Monitoring Authority	Frequency of review
1	Executive Committee - India	Annually
2	CSR Committee	Per the Terms of Reference of the Committee

- I. Programme monitoring mechanism will ensure:
 - The CSR policy is implemented as per the Act and the CSR Rules.
 - The CSR policy is implemented ensuring that all projects/programmes as budgeted are duly carried out.

Evaluation

- I. A robust Barclays monitoring mechanism and evaluation plan is in place which will include monthly and quarterly internal reports and an annual report as per the CSR Rules to monitor and evaluate the project or NGO it is funding.
- II. Expected outcomes, outputs and inputs will be clearly defined for each programme as per stated timelines.
- III. There shall be clarity about the scope of the programme and the need before evaluations are undertaken.

Reporting

The Bank will ensure CSR reporting annually in the format recommended in the CSR rules as part of its annual report to be filed with the Registrar as per provisions of Section 381(b) of the Companies Act, 2013.

Version Control

Version	Date	Change
1.0	August 25, 2015	Review of the Policy
2.0	April 4, 2016	Review of the Policy
3.0	June 13, 2018	Review of the Policy
4.0	October 12, 2020	Review of the Policy

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