

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
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1.0 Background

1. Barclays Bank PLC – India Branch (Bank) will be hereinafter referred as ‘Barclays’ or ‘the Bank’ in this document. 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’) read with and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (‘the CSR Rules’) as amended from time to time, for the community at large.
2. The Policy shall guide CSR programmes and activities undertaken by the Bank in the communities in which it operates.

3.0 CSR Vision Statement

1. 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 Citizenship programmes and the direct efforts of our colleagues. By aligning Barclays Citizenship 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

1. The Executive Committee¹ in India shall review the CSR policy and may amend as may be required basis the recommendation of the CSR Committee. In the event of any conflict between the provisions of this Policy and statutory requirements, law shall prevail over the requirements mentioned in this Policy.

5.0 CSR Activities

Barclays is committed to building a stronger and more inclusive economy that’s better for everyone. As well as being there for customers and clients, the bank is supporting communities by enabling people to develop the skills and confidence they need to succeed through its LifeSkills programme.

¹ For Barclays Bank PLC – India Branch, the responsibilities of Board (as defined in the Companies (Corporate Social Responsibility Policy) Rules, 2014) are fulfilled by the Executive Committee in India.

Through **LifeSkills**, Barclays is supporting vulnerable individuals including those with no formal skills, no access to social capital and other underserved groups develop the vital employability and financial skills they need to succeed at work, thrive in the digital age and better manage their money.

Objective:

The Bank intends to provide employability skills to programme participants from the underserved and underrepresented communities to help them be job-ready. This will help the programme participants in improving their employability and improve their prospects economically. The programme will also have a positive impact on the confidence of the programme participants and enhance their ability to face various challenges in life.

- 1.2 **Any other programme or project in areas or subject specified in Schedule VII:** The Bank may undertake such other activities in areas or subjects as specified in Schedule VII of the Act.

6.0 CSR Budget

1. The Bank's Executive Committee in India shall ensure that the Bank 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 immediately three preceding financial years.
2. Any surplus arising out of the CSR activities shall not form part of the business profit of the Bank and shall be ploughed back into the same project or shall be transferred to the 'Unspent CSR Account' and spent in pursuance of CSR policy and annual action plan of the Bank or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year in accordance of Rule 7(2) of the Companies (Corporate Social Responsibility Policy) Rules 2014 ('CSR Rules').
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 programmes in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time.
4. The Executive Committee shall ensure that administrative overheads shall not exceed 5% of total CSR expenditure of the Bank for the financial year.
5. Any amount spent in excess of the requirement provided under Section 135(5) of the Act, may be set-off against the requirement to spend in the immediate succeeding three financial years' subject to the conditions as prescribed under the Act.
6. If for any reason, the amount allocated for spending as per the Annual Action Plan

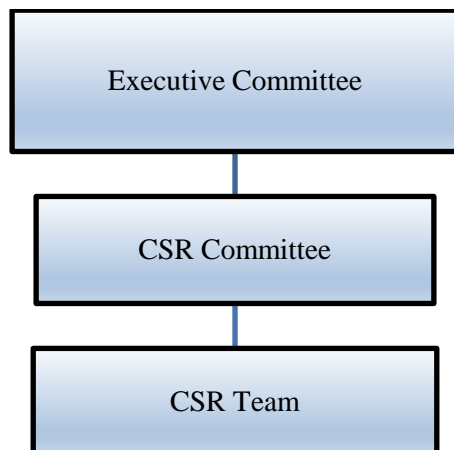
remain unspent, then the same shall be dealt with in accordance with the provisions of the Act.

7.0 Implementation process

1. CSR programme will be undertaken by the bank within the defined ambit of Base Line Survey and Need Assessment.
2. 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 programme and as per the conditions mentioned in the CSR Rules. Any multi-year project undertaken by the Bank in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, including such project that were initially not approved as a multi-year project but whose duration has been extended beyond one year by The Executive Committee based on reasonable justification, will be referred to as 'Ongoing Projects' as defined in Rule 2(i) of CSR Rules.
3. The CSR activities may be undertaken by the Bank either directly or through an implementing agency(ies) which should meet the statutory eligibility criteria laid down under Section 135 of the Act and CSR Rules. The mode of implementation of CSR programmes may include a combination of direct implementation or implementation through: –
 - i. a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company,
or
 - ii. a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government;
or
 - iii. any entity established under an Act of Parliament or a State legislature; or
 - iv. a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.
4. The Bank will select its implementation partners after conducting Due Diligence.
5. The Bank, through its CSR Committee, shall formulate an annual action plan in pursuance of its CSR policy, which shall include the following, namely -
 - a. the list of CSR projects or programmes that are approved to be undertaken

- in areas or subjects specified in Schedule VII of the Act
- b. the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4
 - c. the modalities of utilisation of funds and implementation schedules for the projects or programmes
 - d. the mechanisms to monitor and report projects and programmes &
 - e. details of need and impact assessment, if any, for the projects undertaken by the bank
6. The Executive Committee may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.
 7. The Bank may 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

9.1 The Executive Committee

The Executive Committee of the Bank in India will be responsible towards CSR through the following points:

- i. Approval of the CSR Policy of the Bank including any revisions thereof, after taking into account the recommendations made by the CSR Committee.
- ii. Ensure disclosing the content of the Policy in its report and placing the Policy on the Bank'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.
- iii. The Executive Committee shall also satisfy itself that the funds disbursed have been

utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

- iv. In case of ongoing project, the Executive Committee shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be able to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- v. Ensure that the activities undertaken by the Bank is as per its stated CSR Policy.
- vi. Ensure that the Bank endeavors to spend, in every financial year, at least 2% of the average net profits of the Bank ("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.
- vii. Ensure that the Bank gives preference to the local areas around its operations for spending the amount earmarked for CSR projects.
- viii. Review and approve the Annual Action Plan as proposed by the CSR Committee in pursuance of the CSR Policy. The Executive Committee may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.
- ix. Monitor the implementation of ongoing project with reference to the approved timelines and year-wise allocation and make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- x. Ensure that it specifies the reasons in the prescribed format as specified in the CSR Rules, filed with the Registrar for not spending the allocated amount in case the Bank fails to spend such amount.
- xi. Ensure that any surplus arising out of the CSR activities; any excess amount spend on the CSR activities; and any amount remaining unspent on the CSR activities are treated as per the modalities prescribed under Section 135 of the Act read with CSR Rules. Ensure that the reasons for failure to spend the CSR amount is specified in The Executive Committee report.
- xii. Disclose the composition of the CSR Committee, and CSR Policy and Projects approved by it on the website of the Bank for public access.

9.2 CSR Committee:

1. **Composition of the CSR committee:** The CSR Policy, CSR Activities and CSR expenditure of the Bank shall be implemented, managed and supervised by its CSR Committee. The Executive Committee shall have the power to make any change(s) in the constitution of the Committee.
2. **Responsibility of the CSR Committee:**
 - i. Development and consistent execution of the formulated CSR policy ensuring alignment with the global citizenship strategy and applicable provisions of the Act.
 - ii. Formulate and recommend the CSR Policy to the Executive Committee for its approval which shall indicate the activities to be undertaken by the Bank in areas or subject as specified in Schedule VII to the Act.
 - iii. Recommend to the Executive Committee the amount of CSR expenditure to be incurred by the entity on the projects which are in line with the activities referred in the CSR Policy of the Bank.
 - iv. Formulate and recommend an annual action plan, as specified in e CSR Rules, in pursuance of the Policy or alter such plan based on reasonable justification, if considered necessary.
 - v. Monitor the implementation of CSR Policy of the Bank from time to time
 - vi. Undertake to conduct impact assessment, if required under the Act, for CSR projects having outlays of one crore rupees or more and which have been completed not less than one year before undertaking the impact study, through an independent agency and place such report before the Executive Committee.
 - vii. The Committee shall also institute a transparent monitoring mechanism for implementation of the CSR Projects or programmes or activities undertaken by the Bank.
 - viii. The Executive Committee and CSR Committee of the Bank will be supported and guided by the representative of the regional Citizenship team for discharge of its responsibilities.

9.3 CSR Team:

1. **Composition of 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:**
 - i. The Team will be responsible for on ground assessment of the project(s), and coordination with the NGOs and stakeholders.
 - ii. The Team will be responsible for timely execution and monitoring of the projects.
 - iii. The Team will ensure all background research work and engage with stakeholders either directly or indirectly and prepare project plan for new CSR projects.
 - iv. The Team will plan annual budgets for CSR projects in coordination with the implementing partners and make a proposal to the CSR Committee.

- v. 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.
- vi. The Team will be responsible for having the impact assessments conducted if any, for the projects undertaken by the Bank.

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:

1. Clear objectives developed out of the societal needs that are determined through baselines studies and research
2. Clear targets, timelines and measurable 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
 - i. 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

ii. 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

1. 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.
2. Expected outcomes, outputs and inputs will be clearly defined for each programme as per stated timelines.
3. The Bank will undertake Impact Assessment in line with the conditions mentioned in the Sub rule (3) of Section 8 of the Rules. The impact assessment shall be done through an independent agency, of our CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

Reporting

1. 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.

2. Impact assessment, if undertaken, the reports shall be placed before The Executive Committee and shall be annexed to the annual report on CSR.

Display of CSR activities on the website

The composition of the CSR committee, contents of the CSR policy and the projects as approved by the Executive Committee of the bank shall be mandatorily placed on the website for public access as per Rule 9 of The Companies (Corporate Social Responsibility Policy) Rules, 2014. Further the Annual Report on CSR activities which is part of board report as per Annexure-II of The Companies (Corporate Social Responsibility Policy) Rules, 2014 will be displayed on the website of the company.

Amendment of CSR Policy

The Executive Committee shall have the powers to revise/modify/amend the CSR Policy, from time to time, as deemed appropriate. This is to be done, based on the recommendations made by the CSR Committee to confirm to the requirements set out under the Act and the CSR Rules.

Version Control

Version	Date	Change
1.0	August 25, 2015	Policy Approved
2.0	April 4, 2016	Policy Approved
3.0	June 13, 2018	Policy Approved
4.0	October 12, 2020	Policy Approved
5.0	June 28, 2021	Policy Approved
6.0	March 06, 2023	Policy Approved
7.0	November 16, 2023	Policy Approved

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