

# 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	8.0
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## 1. 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. 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. Review and amendment of CSR Policy

1. The Executive Committee<sup>1</sup> 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.
2. The Executive Committee shall have the powers to modify 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.

## 4. CSR Activities

1. **LifeSkills Programme:** 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

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<sup>1</sup> 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.

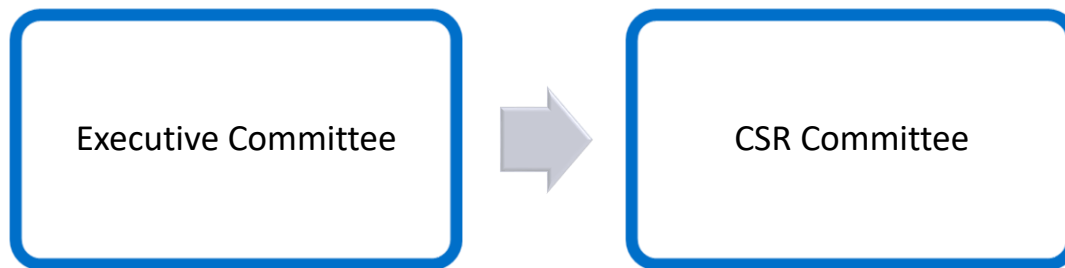
its LifeSkills programme. Through LifeSkills, Barclays is supporting low-income groups, including those with limited access to social capital, limited formal skills and other underserved groups develop vital employability and financial skills they need to succeed at work, thrive in the digital age and better manage their money.

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.

## 5. 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.
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 modalities of utilisation of funds and implementation schedules for the projects or programmes
  - c. the mechanisms to monitor and report projects and programmes &
  - d. 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.

## 6. CSR Governance Structure



## 7. Roles & Responsibilities

### A. Executive Committee

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

- a. Approval of the CSR Policy of the Bank including any revisions thereof, after considering the recommendations made by the CSR Committee.
- b. 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.
- c. 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.
- d. 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.

### B. 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:**

- a. 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.
- b. 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.
- c. 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.
- d. Monitor the implementation of CSR Policy of the Bank from time to time

## 8. Monitoring, Evaluation & Reporting Framework

1. The Bank will institute a well-defined monitoring and evaluation mechanism to ensure that each CSR programme is measurable.
2. Expected outcome will be defined and explained.
3. 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.
4. Impact assessment, if undertaken, shall be placed before The Executive Committee and shall be annexed to the annual report on CSR.

### A. 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
8.0	May 06, 2024	Policy Approved