

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

Policy Governance	
Policy Owner(s)	Head of Citizenship, APAC
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

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 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

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:

1. 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 beneficiaries 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.

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 projects or programs or activities shall not form part of the business profit of the Bank and will be ploughed back into the same project; or will be transferred to 'Unspent CSR Account' and spent in pursuance of CSR policy and annual action plan of the bank; or will be transferred to a Fund specified in Schedule VII within a period of six months of the expiry of the financial year.
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.

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.

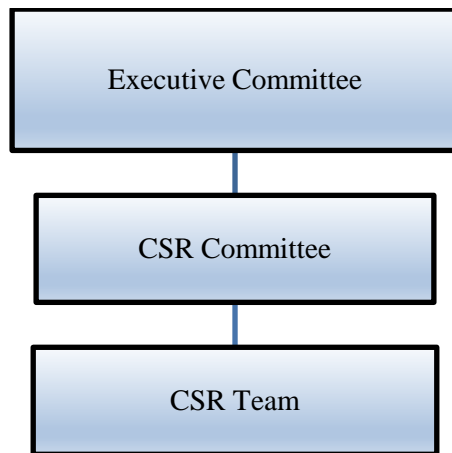
7.0 Implementation process

- ❖ 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 the intended impact of the program 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 board based on reasonable justification, will be referred to as 'Ongoing Projects'.
- ❖ 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: –
 - a) a company established under section 8 of the Act, or a registered public trust or a registered society, 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
 - b) 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
 - c) any entity established under an Act of Parliament or a State legislature; or
 - d) a company established under section 8 of the Act, or a registered public trust or a registered society, 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.
 - e) The Bank will select its implementation partners after appropriate Due Diligence.
- ❖ The Bank, through its CSR Committee, shall formulate an annual action plan consisting of

list of CSR projects or programmes that are approved to be undertaken in the areas or subjects specified in Schedule VII of the Act; manner of execution of projects; modalities of utilization of funds and implementation schedules for projects; monitoring and reporting mechanism for the projects; and details of need and impact assessment, if any, for the projects to be undertaken

❖ 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 for:

- ❖ Review and Approve the CSR Policy of the Bank, after taking into account the recommendations made by the CSR Committee and disclose the contents of such Policy in its report and also place it on the Bank's website, in the manner prescribed under the Act.
- ❖ Ensure that the activities undertaken by the Bank is as per its stated CSR Policy.
- ❖ Ensure that the Bank spends, in every financial year, at least 2% of its average net profits made during the three immediately preceding financial years in pursuance of the Policy.
- ❖ Ensure that the Bank gives preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.
- ❖ 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.
- ❖ 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.

- ❖ Satisfy itself that the funds disbursed have been utilized 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.

- ❖ 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 Board's report.

9.2 CSR Committee:

Composition of 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 applicable provisions of the Act
- ❖ 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.
- ❖ 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.
- ❖ 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.
- ❖ Monitor the implementation of CSR Policy of the Bank from time to time
- ❖ 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.
- ❖ The Committee shall also institute a transparent monitoring mechanism for implementation of the CSR Projects or programs or activities undertaken by the Bank.

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:**
 - ❖ The Team will be responsible for on ground assessment of the project(s), and 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 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

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.
- IV. The Bank will undertake Impact Assessment through an independent agency, for eligible CSR projects or programs as mentioned under the Act.

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.

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

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

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