

Corporate Social Responsibility (CSR) Policy of BARCLAYS SECURITIES (INDIA) PRIVATE LIMITED

Policy Governance	
Policy Owner(s)	Barclays Citizenship Function
Policy Approver(s)	Board of Directors of Barclays Securities (India) Private Limited
Version	1
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Last Approved On	NA

1. Background

1. Barclays Securities (India) Private Limited will be hereinafter referred as 'BSIPL or 'the 'Company' 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. BSIPL has developed this Policy titled 'BSIPL CSR Policy' ('Policy') encompassing the Company'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 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 Company in the communities in which it operates.

3. Review and amendment of CSR Policy

1. The Board shall review the CSR policy and may amend as may be required. 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.

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 and supporting communities by enabling people to develop the skills and confidence they need to succeed through 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 of the Act:** The Company 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 Company 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 Company 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'.
3. The CSR activities may be undertaken by the Company 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 Company will select its implementation partners after conducting Due Diligence.
5. The Company 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 Company.
6. The Board may alter such plan at any time during the financial year based on the reasonable justification to that effect.

6. Roles & Responsibilities of the Board

The Board of Directors of the Company will be responsible towards CSR through the following points:

- a. Approval of the CSR Policy of the Company including any revisions thereof.
- b. Monitor the implementation of CSR Policy of the Company from time to time
- c. Ensure that the Company spends, in every financial year, at least 2% of its average net profits made during the three immediately preceding financial years. Also, the administrative overheads do not exceed 5% of total CSR expenditure of the Company for the financial year.
- d. 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.

- e. Review and approve the Annual Action Plan in pursuance of the CSR Policy. The Board may alter such plan at any time during the financial year based on the reasonable justification to that effect.
- f. 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.
- g. Any surplus arising out of CSR activity, any excess amount spent, or any amount remaining unspent are dealt with in accordance with section 135 of the Act and relevant CSR Rules.
- h. In case of failure to spend CSR amount, Board shall specify the reasons for not spending the amount in the Board's report.
- i. Disclose the CSR policy and CSR projects approved by it on the website of the Company for public access.

7. Monitoring, Evaluation & Reporting Framework

- 1. The Company 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 Company will ensure CSR reporting annually in the format recommended in the CSR rules as part of its annual report.
- 4. Impact assessment, if undertaken, shall be placed before the Board and shall be annexed to the annual report on CSR.

8. Version Control

Version	Date	Change
1	August 27, 2024	Policy approved