



CORPORATE SOCIAL RESPONSIBILITY ('CSR') POLICY
OF
BARCLAYS WEALTH TRUSTEES (INDIA) PRIVATE LIMITED

Policy Governance	
Policy Owner(s)	Barclays Citizenship Function
Policy Approver(s)	Board of Directors of Barclays Wealth Trustees (India) Private Limited
Version	1.0
Approval Date	July 31, 2018

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 Wealth Trustees (India) Private Limited (**the 'Company'/'BWTIPL'**) has developed this Policy titled 'Corporate Social Responsibility ('CSR') Policy of Barclays Wealth Trustees (India) Private Limited' (**the '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'**) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the 'Rules'), as may be amended from time to time for the community at large.
2. The Policy shall guide the CSR programmes and activities undertaken by the Company 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. Barclays does this through its Citizenship programmes and the direct efforts of its colleagues. By aligning Barclays Citizenship strategy to its skills and experience, the positive impact of its activity is much more than just a financial contribution

4.0 Review of CSR Policy

The Board may review the CSR policy and make necessary amendments, as and when required.

5.0 CSR Programme Areas & Objectives

The Company 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 Company will intervene in the area of Skilling through its Global Youth Employability Programme:

1. **Global Youth Employability Programme ('YEP')**: 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 Company 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.

- 2. Matched Fundraising Programme:** Barclays strongly believes in supporting the communities in which it operates. One way to extend the support is through helping its employees in supporting causes that are close to the employees' heart.

Objective:

The company's global parent intends to match contributions made for a cause supported by their employees. This would help the beneficiaries in attaining their objectives as a charitable organization.

- 3. 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

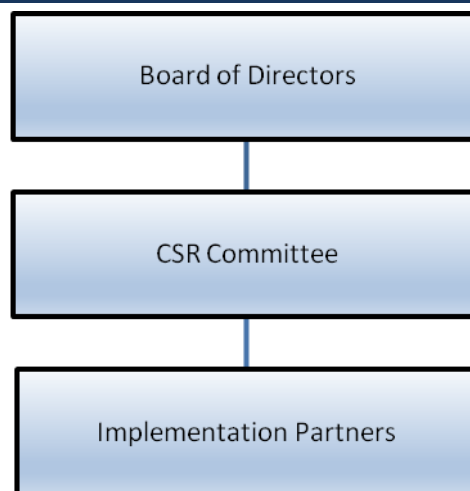
1. The Board shall endeavor that the Company spends, in every financial year, at least 2% of its average net profit (calculated in accordance with the provisions of Section 198 of the Act, as may be amended from time to time) made during the immediate three preceding financial years.
2. Any surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company and shall be utilized only for CSR purposes.
3. The Company 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 Rules, as may be amended from time to time.

7.0 Implementation process

- ❖ CSR programme will be undertaken by the Company 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 Company 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 may include a combination of direct implementation or implementation through foundation, Non Government Organizations (NGOs), business partners, civil society, registered societies etc. The Company will select its partners after appropriate due diligence.
- ❖ The mode of implementation will also include employee volunteering. The Barclays employee volunteering may involve the Company's employees in the community initiatives it undertakes and help them contribute towards the society.
- ❖ The Company 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

9.1 The Board:

The Board of Directors of the Company will be responsible for:

- ❖ Approval of the CSR Policy of the Company including any revisions thereof.
- ❖ Placing the Policy on the Company's website in such manner as prescribed under Section 135 of the Act read with the Rules and any amendments to the Act/Rules thereto.
- ❖ Disclosing the content of the Policy in the Boards' report in the manner provided under the Act and Rules made thereunder, as amended from time to time..
- ❖ Ensuring that the projects included in the Policy are undertaken by the Company
- ❖ Ensuring that the Company endeavors to spend, in every financial year, at least 2% of the average net profits (calculated in accordance with the provisions of Section 198 of the Companies Act, 2013, as may be amended from time to time) of the Company 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 its report for not spending the allocated amount in case the Company fails to spend such amount

9.2 CSR 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 to the Board the CSR policy for its approval (including any modifications thereof) which shall indicate the activities to be undertaken by the Company.
- ❖ Monitor the implementation of the CSR policy from time to time.
- ❖ Approve and recommend to the Board the CSR projects, which are in line with the activities specified in the CSR Policy of the Company, to be undertaken by the Company.
- ❖ Approve and recommend the amount of CSR expenditure to be incurred by the entity on the activities referred in the CSR Policy of the Company.

10.0 Monitoring and Reporting Framework

10.1 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	Board of Directors	Annually
2	CSR Committee	As per the Terms of Reference of the Committee

10.2 Evaluation

A robust Barclays monitoring mechanism and evaluation plan is in place which will include timely internal reports and Annual Reports as per the Rules in order to monitor and evaluate the projects and the implementing agency to which it is funding.

10.3 Reporting

The Company will ensure CSR reporting annually in the format recommended in the Rules, as may be amended from time to time, as part of its Annual Report.

11.0 Version Control

Version	Date	Change
1.0	July 31, 2018	Policy Approved