



AIG CORPORATE SOCIAL RESPONSIBILITY POLICY – India (AIG Analytics & Services Private Limited)

Issued: 23/03/2016

Last Updated: N/A

1. PURPOSE:

AIG Analytics & Services Private Limited (herein referred to as the “Company”) is committed to making a positive difference in the communities where we work, live, and serve our customers.

2. OBJECTIVE & SCOPE

The Company is committed:

- To ensuring that our business operations are conducted in a responsible and sustainable way and to fulfill our role as a socially responsible corporate entity; and
- To directly or indirectly take up programmes that benefit the communities in & around the Company’s work center and result, over a period of time, in enhancing the quality of life & economic well-being of the local populace.

This Corporate Social Responsibility Policy (“CSR Policy”), prepared in accordance with the provisions of the Companies Act, 2013 (hereafter referred to as the “Act”) read with Companies (Corporate Social Responsibility Policy) Rules, 2014 and other directions and clarifications issued thereunder from time to time (collectively referred to as the “CSR Regulations”), lays down broad guidelines and principles for the activities to be undertaken by the Company in India in the sphere of corporate social responsibility .

3. CSR COMMITTEE OF THE COMPANY

3.1 Constitution

The Board of Directors of the Company is responsible to constitute the Corporate Social Responsibility (“CSR”) Committee as a sub- committee of the Board in compliance with the CSR Regulations. The members of the CSR Committee shall be appointed by the Board of Directors of the Company and shall consist of at least three Directors of the Company. Composition of the CSR Committee will also be included in the Director’s Report (as defined below).

3.2 Committee meetings

The quorum for the CSR Committee meeting shall be two members.

The CSR Committee shall meet as often as its members deem necessary to perform its duties and responsibilities. The Committee members may attend the meeting physically or via such audio visual means as permitted under the Act. The Company Secretary shall act as Secretary to the Committee.

3.3. Duties & responsibilities of CSR Committee

The Corporate Social Responsibility Committee shall—

- i. Be responsible for formulating and recommending to the Board of Directors, this CSR Policy which shall indicate the CSR activities/programs to be undertaken by the Company and updating this CSR Policy as may be required in accordance with the CSR Regulations.
- ii. Recommend the amount of expenditure to be incurred on the CSR activities/programs and the CSR activities to be undertaken by the Company in accordance with the CSR Regulations.
- iii. Institute a transparent mechanism for implementation of the CSR projects and activities and to effectively monitor the execution of the CSR activities.
- iv. Prepare an annual report of the CSR activities undertaken by the Company and submit such report to the Board (the **“Director’s Report”**).
- v. Carry out any other function as may be mandated by the Board from time to time and/or enforced by any statutory notification, amendment or modification, as may be applicable, necessary or appropriate for the performance of its duties.

4. CSR SPENDING

The Company would spend, in every financial year, not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years (Net profit to be calculated in accordance with the provisions of the Act). The surplus arising out of the CSR activity will not be part of business profits of the Company.

The CSR Committee in consultation with the Board of Directors of the Company will identify suitable projects for implementation in line with the CSR Regulations. The CSR activities to be undertaken by the Company shall be related to the activities included in Schedule VII of the Act and listed in Annexure 1 hereof. These projects would be executed either directly by the Company and/or through various agencies/by pooling resources with other companies as permitted under the CSR Regulations.

The Company may build CSR capacities of its personnel and/or those of its implementing agencies through institutions with established track records of at least three financial years but

such expenditure including expenditure on administrative overheads shall not exceed five percent of total CSR expenditure of the Company in one financial year.

Contribution of any amount, directly or indirectly, to any political party or CSR projects or programs that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with CSR Regulations.

5. IMPLEMENTING CSR ACTIVITIES

- i. The CSR Committee will delegate the day to day implementation of the CSR activities/projects. Execution of the CSR activities/projects shall be carried out through the CSR Core Team, to be constituted by the CSR Committee.
- ii. CSR activities may be undertaken through various agencies including registered trusts/ societies or companies established under section 8 of the Act (or under section 25 of Companies Act, 1956). In case of NGOs/Trust/ Companies established under Section 8 of the Act (or under section 25 of Companies Act, 1956), an established track record of three years in undertaking similar projects or programs would be essential. Also, the Company would, in such case, specify the projects or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs. The CSR Committee shall set-up separate monitoring and reporting mechanisms for CSR activities taken through such entities.
- iii. Some of the initiatives taken up by the Company will facilitate the involvement of the Company's employees as Company's volunteers in ongoing projects and events, giving them an opportunity to engage in socially meaningful activities, thus, enabling them to realize their full potential and role as socially responsible citizens (Employee Volunteer Programs).
- iv. The initiatives undertaken may be communicated to the employees through specific awareness campaigns, so as to enable maximum participation.
- v. The Company may also collaborate or pool resources with other companies to undertake CSR activities in such a manner that each of such companies are in a position to report separately on such CSR projects.
- vi. Monitoring and feedback:
 - a) The CSR Committee shall be responsible for overall implementation and execution of CSR activities/projects.
 - b) The CSR Committee shall be apprised on the implementation of the CSR activities by the CSR Core Team.

- c) To ensure transparency and effective implementation of the CSR activities by the CSR Core Team, progress shall be monitored on a quarterly basis and the CSR Committee may require periodic submission of reports by the CSR Core Team in this regard.
- d) Further, the CSR Committee may set up other monitoring mechanisms including site visits to ensure effective implementation of the CSR activities.

6. REVIEW AND REPORTING TO THE BOARD

The CSR Committee will review and will provide progress update on the CSR activities undertaken by the Company to the Board of Directors every six months/such other intervals as deemed fit. The Company will report, in the prescribed format as set out herein as Annexure 2, the details of CSR initiatives and activities of the Company in the Directors' Report and on the website of the Company, if any, as required under the CSR Regulations. Such reporting will be done, pertaining to financial year(s) commencing on or after the 1st day of April 2015.

7. AMENDMENTS

The Policy may be reviewed, updated and amended as may be required in accordance with CSR Regulations and would be placed for approval before the Board of Directors upon each such review, update or amendment.

Annexure - 1

CSR Activities as per Schedule VII of the Companies Act, 2013

CSR shall focus on social, economic and environmental impact rather than mere output and outcome. Activities which are ad hoc and philanthropic in nature shall be avoided. Various activities that can be undertaken in general under CSR by the Company are outlined below:

- i. eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare and sanitation and making available safe drinking water;
- ii. promotion of education; including special education and employment enhancing vocation skills especially among children, woman, elderly and the differently abled and livelihood enhancement projects ;
- iii. promoting gender equality and empowering women; setting up homes and hostels for women and orphans, setting up old age homes, day care centres, and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- iv. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining of quality of soil, air and water;
- v. protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up of public libraries; promotion and development of traditional arts and handicrafts;
- vi. measures for the benefit of armed forces veterans, war widows and their dependents;
- vii. training to promote rural sports, nationally recognized sports, and paralympic sports and Olympic sports;
- viii. contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- ix. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- x. rural development projects; and
- xi. slum area development

Annexure-2

Format for the annual report on CSR activities to be included in the Director's report (As per the CSR Rules, 2014)

1. A brief outline of the Company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs.
2. The Composition of the CSR Committee.
3. Average net profit of the Company for last three financial years.
4. Prescribed CSR Expenditure (two per cent of the amount as in item 3 above)
5. Details of CSR spent during the financial year.
 - a) Total amount to be spent for the financial year;
 - b) Amount unspent, if any;
 - c) Manner in which the amount spent during the financial year is detailed below.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
S.No	CSR project or activity identified	Sector in which the project is covered	Projects or programs (1) Local area or other (2) Specify the state and district where projects or programs were undertaken	Amount outlay(budget) project or programs wise	Amount spent on the projects or programs Sub-heads: (1) Direct expenditure on projects or programs. (2) Overheads:	Cumulative expenditure upto the reporting period	Amount spent: Direct or through implementing agency
1							
2							
3							
	TOTAL						

6. In case the Company has failed to spend the two percent of the average net profit of the last three financial years or any part thereof, the Company shall provide the reasons for not spending the amount in its Board report.
7. A responsibility statement of the CSR Committee that the implementation and monitoring of CSR Policy, is in compliance with CSR objectives and policy of the Company.

Sd/-	Sd/-	Sd/-
------	------	------

(Chief Executive Officer or Managing Director or Director)	(Chairman CSR Committee)	(Person Specified under clause (d) of sub-section (1) of section 380 of the Act.) (wherever applicable)
--	--------------------------	---