

Policy for VOYA INDIA Corporate Social Responsibility (“CSR”)

Contents:

1. Purpose	3
2. Scope	3
3. Our CSR Philosophy and Objectives	3
4. CSR Committee	3
5. Areas for CSR Projects and Programmes	5

1. Scope:

This policy is applicable to Voya Global Services Private Limited (formerly known as VFI SLK Global Services Pvt. Ltd. (hereinafter referred to as “**Voya India/We**”)

2. Purpose:

This policy defines Voya India’s Corporate Social Responsibility (CSR) philosophy, objectives and programmes to be undertaken to fulfil the obligations as a responsible corporate citizen and in pursuance of the statutory requirements, and recommendations of the CSR Committee as mentioned under Section 4 of this policy and the Board members of Voya India (“**Board**”).

3. Our CSR Philosophy and Objectives

Voya India believes that sustainable development of businesses is dependent on sustainable beneficial relationships with our stakeholders, especially the communities we work with.

It shall therefore be Voya India’s endeavor to undertake CSR programmes and projects, in the areas identified in this policy, to have a positive impact, predominantly in the Union of India, as required by the Rules.

However, programmes or initiatives with merit in places as required, which meet the overall CSR objectives of Voya India may also be recommended and approved.

Voya India shall also actively engage its employees in the CSR activities undertaken by it with an objective of inculcating the habit of service, philanthropy and benevolence amongst its employees. We believe that our employees have the potential to contribute not only to our business, but towards building strong communities around where we operate and elsewhere.

4. CSR Committee:

To help Voya India achieve its CSR objectives, a CSR committee has been changed to align with Voya India CSR objective and are currently comprises of w.e.f. :

1. Ms. Sharada Nandakumar, Director
2. Ms. Lori Falcone, Director
3. Mr. Santhosh Keshavan, Director

The above-named employees of Voya India and its associated companies shall constitute as the CSR committee (“**Committee**”) shall be responsible for recommending the CSR activities to be undertaken by Voya India year on year, monitoring and reviewing the progress and updating the Board.

Committee nominates shall nominates relevant personnel from time to time to be appointed as the CSR Project Coordinator to manage and implement the CSR projects of Voya India for the approved projects on its behalf and the keep the Committee updated and apprised of the same.

5. Focus Areas for CSR Projects and Programmes

The CSR projects and programmes to be selected and recommended by the CSR committee to be undertaken by Voya India, shall be in the following broad categories namely

- Promoting **health care**
- Eradicating **hunger** and **poverty**
- Promotion of **education**

- Ensuring **environmental** sustainability
- **Rural development** - preferably in the vicinity of Voya India's offices
- Promoting **gender equality, Inclusivity of special ability** and supporting Old age homes
- Promoting **human empowerment**
- Promotion of **rural sports**, nationally recognized Sports, Paralympic Sports and Olympic Sports
- Ensuring protection of flora and fauna and **animal welfare**.
- Any other activity as recommended by the Committee on a need basis which falls within the Schedule
- VII of the Companies Act as listed out in Annexure-I.

6. Implementation (How we go about)

Considering the size of Voya India and the overall budget involved, it may not be viable for Voya India to directly engage itself in the activities listed above.

Voya India shall undertake the CSR activities through entities ("**CSR Partners**") who have a minimum of three-year track record and who are an organization which is under Section 8 Companies Act, 2013, or a registered public trust or a registered society, registered u/s 12A and 80 G of the Income Tax Act, 1961. With effect from 1st April 2024, Voya India will work only with such agencies which are registered with the Central Government and have obtained a unique CSR Registration Number.

Wherever feasible, may also implement these projects or programmes on its own.

The goals and objectives along with the budgets of the CSR group will be discussed and signed off at the beginning of every year with the CSR committee and the Board. This will happen as part of the annual strategic and operating plan processes of the organization. The CSR leadership team will allocate the budgets in line with the defined priorities and goals.

7. Monitoring and Reporting

The CSR committee shall oversee identification of CSR projects/ programmes, partner identification, funding, implementation and monitoring of chosen CSR projects/ programmes.

The committee shall monitor the expenditure and impact of the above activities once in a quarter.

The Board shall review the quarterly report which shall detail out the following in respect of each CSR activity

- Name of the Project/ Program/ Activity
- Mode of undertaking - by Voya India or through a CSR Partner
- If carried out through CSR Partner, details of the Partner
- Budget earmarked
- Cumulative amount spent till the date of reporting
- Balance to be spent
- Impact created
- Notes and comments, if any

Wherever the CSR activities are performed through a CSR Partner, Voya India shall ensure that the amounts earmarked were actually spent for the intended purposes and also call for such documents and proof of expenditure as may be necessary for this purpose.

The CSR expenditure and activities shall also be audited by Voya India's internal audit team on a half yearly basis and the audit team shall update the CFO on its findings.

8. Review of Policy

The CSR Policy shall be reviewed every three years or as may be recommended by the CSR Committee of Voya India.

ANNEXURE

Details of Focus areas

- **Health Care:** Promoting preventive healthcare, sanitation and safe drinking waters
- **Hunger and Poverty:** Eradicating extreme hunger, malnutrition and poverty
- **Education:** Promoting education, including special education, development of skills in underprivileged Children, Women, elderly, differently abled people, monetary contributions for establishing necessary infrastructure
- **Environmental sustainability:** Ensuring environmental sustainability through conservation of natural resources, maintenance of quality of soil, air and water, protection of flora and fauna
- **Rural Development:** Preferably in the vicinity of Voya India's offices. Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
- **Gender Equality and Supporting Old age homes:** Adopting measures for reducing inequalities faced by socially and economically backward groups.
Promotion of Rural Sports, Nationally recognized Sports, Paralympic Sports and Olympic Sports.
- **Animal welfare:** contribution to such entities which are engaged in disease prevention and veterinary treatment, appropriate shelter management for animals, nutrition, humane handling and humane slaughter/killing of animals.

Revision History

Date	Ver.	Description	Reference	Author	Reviewed by	Approved by
22-Mar-2021						
2-Mar2021	1.00	Policy for Corporate Social Responsibility	Section 135, Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules 2021.	Alok Tiwari	Indushekhar Jayakumar	Board of Directors
11th December 2023	2.0	Changes in policy to include more focus area and change in CSR Committee	Priyanka Gulati	Nitin Dharamshi	Board of Directors	Board of Directors