

CORPORATE SOCIAL RESPONSIBILITIES (CSR) POLICY OF
MAX BUPA HEALTH INSURANCE COMPANY LIMITED

I. PREAMBLE

- 1.1 Corporate Social Responsibility has been an area of focus for the Max Group and Max Bupa Health Insurance Company Limited, (“**Max Bupa**” or **the “Company**”) since inception. Max Group being in the “*Business of Life*”, there has been a conscious effort to make a difference in the lives of the less privileged through its CSR initiatives. Max Bupa has given this priority and effected positive change in the quality of life of the underserved in keeping with the Group philosophy.
- 1.2 The Companies Act brings emphasis on CSR with Rules that provide guidance on minimum CSR spend, reporting mechanism, review structure and reporting to the shareholders of the Company. A CSR Committee has been formed at the Board level to oversee CSR Activities of the Company.
- 1.3 Further to the above stated, the Board is to approve this CSR Policy which has been formulated and proposed by the CSR Committee with an objective to outline its CSR focus areas, recommending the amount of CSR Expenditure, execution process, review & monitoring mechanism and, reporting process to the Management and the Board of Directors of the Company.

II. PHILOSOPHY & OBJECTIVES

Max Bupa has the vision to build ‘the most admired health insurance Company’ by securing the health of our customers and the Company’s mission ‘to help customers live healthier, more successful lives’. It aims to be committed to social causes and relevance for its inclusive growth and to contribute to society by supporting causes on the health and well-being platform.

III. DEFINITIONS AND INTERPRETATIONS

“**CSR**” means Corporate Social Responsibility.

“**Companies Act**” shall mean the Indian Companies Act, 2013, along with amendments thereto.

“**CSR Activities**” shall mean the permissible CSR activities as per Schedule VII.

“**CSR Committee**” shall mean the CSR Committee of the Board instituted by the Company.

“**CSR Rules**” shall mean the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

“**CSR Expenditure**” shall mean the CSR expenditure proposed under this Policy and providing the corpus amount in furtherance of this Policy.

“**Estimated CSR Expenditure**” shall mean the actual estimate of the CSR Expenditure for each year as has been approved for each year.

“**Max Bupa CSR Policy**” or “**CSR Policy**” shall mean this CSR Policy of Max Bupa.

“Max Bupa CSR Activities” shall mean the services rendered in the Max CSR Identified Sectors.

“Max Bupa CSR Identified Sectors” mean the following sectors, as have been identified under this CSR Policy, (i) Health, Hygiene & Sanitation (ii) Nutrition, (iii) Livelihood, (iv) Financial Literacy & Insurance Awareness and (v) Health and Environment Awareness (vi) NGOs support in areas mentioned and (vii) Disaster support.

“Max Group” shall mean Max India Limited, Max Financial Services Limited, Max Ventures & Industries Limited and the following subsidiaries of 1) Max Financial Services Limited: (i) Max Life Insurance Company Limited, 2) Max India Limited: (i) Max Healthcare Institute Limited, (ii) Max Bupa Health Insurance Company Limited, (iii) Antara Senior Living Limited and 3) Max Ventures & Industries Limited (i) Max Specialty Films Limited.

“Max India Foundation” means the registered not-for-profit Trust, founded by Max India Limited as its Founder/Settlor on January 31, 2002.

“Primary and Secondary Education” shall mean the primary and secondary education system, as is recognised in India.

“Proposed Implementation Plan” shall mean the annual proposed implementation plan in respect of the Max CSR Activities to be provided each year.

“Quarter” shall mean an annual quarter for each Financial Year.

“Rules” shall mean the rules prescribed under the Companies Act, as amended from time to time.

“Schedule VII” shall mean the schedule VII under the Companies Act.

“Village” shall mean rural villages, urban villages, slum clusters, cluster of villages and geographies covered by Gram Panchayats.

IV. CSR IDENTIFIED SECTORS AND CSR ACTIVITIES

The Company shall undertake CSR Activities in all or any of the CSR Activities as per the Companies Act, however, it shall give primary importance to the Company’s CSR Identified Sectors as follows.

4.1 Health, Hygiene & Sanitation

- a. Supporting and facilitating surgery and high-end treatment for underprivileged Indian patients
- b. Preventive healthcare for underprivileged Indian patients in identified geographies
- c. Health camps including immunization camps for underprivileged in identified geographies where Max Group has its presence
- d. Blood donation camps in Max Bupa Insurance agency offices
- e. Disability support including artificial limbs and polio callipers support
- f. Health awareness, including cancer awareness prevention, screening and treatment support for the needy.
- g. Personal hygiene training and support in those villages which have been adopted by the Company and in those locations where Health and Immunization camps are organized by the Company
- h. Environmental awareness and care in and around the selected areas of operations of the Company. Propagation of a clean healthy environment to ensure good health. Encourage and facilitate plantation drives.
- i. Waste management and correct waste disposal – awareness and implementation primarily in adopted villages and in identified locations where the Company has its offices
- j. Clean drinking water primarily in adopted villages and schools for underprivileged children
- k. Sewerage system and management in adopted villages.

4.2 Nutrition

- a. Awareness on how to ensure true nutritious meal to family.
- b. Vitamin A (children 0-5 years) and other supplements for underprivileged women and children.
- c. Nutritional support through NGOs to underserved children.

4.3 Livelihood

- a. Vocational training and creating & supporting Self Help Groups for women, adolescent girls and youth in villages adopted by the Company. The vocations for which training will be provided will be focused on health related issues where possible, identified basis the inherent skill sets and commercial opportunities for those vocations in and around the adopted villages.

4.4 Health Insurance Awareness

- a. Health insurance awareness for students in schools and colleges through simple to understand material in identified locations where Max Bupa Insurance has its offices.
- b. Health insurance awareness to underprivileged in cities where Max Bupa Insurance has owned offices and villages adopted by Max Bupa Insurance.
- c. Encourage households to enroll in Government promoted health insurance schemes.

4.5 Education

- a. Provide support to schools to promote education by providing books, education aids, black boards and equipment for sports & other extra-curricular activities and basic infrastructure.
- b. Education support should be provided in villages adopted by the Company and volunteering activities under Pehal.

4.6 NGOs support in above mentioned areas

- a. Provide support to existing activities of NGOs.

- b. Involve employees in identifying NGOs in their geographical areas and create tailored volunteering programme within specified budget and timeline.

4.7 **Disaster Support**

- a. Provide material and financial support to local communities in case of any disaster.

V. MODALITIES OF EXECUTION AND IMPLEMENTATION SCHEDULES

5.1 **Independent Implementing Agency:** The Company shall work with Max India Foundation which will in turn work with relevant credible NGOs and organisations to execute work on the ground. Max India Foundation will be the primary partner and only in cases where the Foundation is not in a position to undertake any activity, Max Bupa will directly work with other NGOs. For volunteering activities undertaken by employees directly or through NGOs separate funds will be earmarked which will be allocated by Max India Foundation to offices once they share the relevant project details.

5.2 **NGO Support:** Max India Foundation will execute projects with the help of NGOs, Max Group companies and employee engagement. Max India Foundation may seek the support of NGOs who are working on ground on issues decided upon. Max India Foundation will also provide training support to volunteers to carry out / support in CSR activities.

5.3 **Volunteering:** Max Bupa and Max India Foundation should work together to create a comprehensive Employee Volunteering programme to ensure greater participation of employees in CSR activities. This programme should also include the recognition programme for Max Bupa volunteers. Senior management will encourage volunteer programmes of the Max Bupa employees.

5.4 **Modality of Execution of Max CSR Activities:** The Company shall execute and undertake the Max Bupa CSR Activities as mentioned in section IV through Max India Foundation or any other NGOs, if required.

5.5 **Geographical Areas for Max CSR Activities:** The Company shall execute and undertake the Max Bupa CSR Activities in identified locations where Max Group has presence and in the village(s) adopted by Max Bupa Insurance.

5.6 **Beneficiaries for the Max Bupa CSR Activities:**

1. Children (0-18 years)
2. Women
3. Youth (18-25 years)
4. Senior citizens
5. Others – society at large

VI. CSR FUNDING AND CSR EXPENDITURE

6.1 **CSR Budget:** In order to ensure funding for the Max Bupa CSR Activities, Max Bupa shall strive to allocate 2% (two per cent) of the average net profits before tax made by the Company (Shareholders' Profit) in its immediately preceding three financial years.

6.2 **CSR Expenditure Funds:** The CSR Committee will present the Proposed Implementation Plan to the Board, detailing the action steps, modalities and the Estimated CSR Expenditure to the Company, for the Board's approval. The CSR Committee shall prepare the Proposed Implementation Plan together with Max India Foundation or any other NGO it decided to work with.

6.3 **Implementation Plan.** The Board shall approve the Final Implementation Plan and the CSR Expenditure Funds shall be allocated for implementation by Max India Foundation or other NGOs.

6.4 **Declaration.** The Company hereby declares that any surplus arising and/or additional revenue generated out of CSR Activities undertaken by the Company shall not form part of the business profit of the Company and same shall be spent for undertaking any CSR Activities only

VII. Monitoring Process of CSR Activities

7.1 **Approval of CSR Plan.** Max India Foundation and other NGOs, with whom the Company may decide to work with from time to time, shall present and get approval on a quarterly activity plan at the beginning of every quarter from relevant authority at Max Bupa. The plan should be in line with Max Bupa CSR Policy approved by the CSR Committee. This plan will form the basis for progress report to CSR Committee.

7.2 **Reporting to CSR Committee.** Max India Foundation and other NGOs the Company may decide to work with from time to time shall provide a detailed progress report on the Key Performance Indicators to the CSR Committee every Quarter, or, at such intervals and at such times as the CSR Committee shall require Max India Foundation and other NGOs to do so. The progress on CSR issues selected by the Company will be reported in the Annual Report in the format prescribed by the CSR Rules.

7.3 **Reporting to the Board.** The CSR Committee, after approval, shall submit its report giving status of the CSR Activities undertaken, CSR Expenditure incurred and such other details as may be required by the Board, in accordance with applicable laws.

7.4 **Key Performance Indicators:** Following shall be the key indicators for assessment of each of the Max Bupa CSR Identified Sectors:

Issues	Key Performance Indicators
Healthcare	
Surgeries and treatments	i) Total no. of beneficiaries
Preventive Healthcare	
Immunization	i) No. of children covered ii) No. of vaccines administered iii) No. of camps organised iv) No. of locations covered
Health Camps	i) No. of beneficiaries ii) No. of locations covered iii) No. of camps organized
Personal Hygiene & Environment Hygiene	i) No. of children and adults trained ii) No. of garbage dumps created / open drains cleaned iii) No. of people / households trained in segregation of Waste
Nutrition	
Vitamin A	i) No. of children (0-5 years) given vitamin A capsules.
Other supplements	ii) No. of women and children provided with other supplements
Livelihood	
Vocational training	i) No. of individuals registered for vocational training ii) No. Individuals placed
Environment	
Environment Awareness & Protection	i) No. of saplings planted. . ii) Number of beneficiaries of awareness programmes.
Literacy	
Health Insurance Awareness	i) No. of schools / colleges covered ii) No. of students provided with health literacy
Education	
Education	i) No. of students benefited by the support activities
Volunteering	
Volunteering	i) No. of employees and agent advisors participated in CSR activities
Miscellaneous	
	i) Any other parameters as the CSR Committee may require

7.5 **Board Report and Annual Report.** The Board shall publish this Policy and an annual report on CSR Activities as per applicable laws.

a. Budget for FY ...

Annual CSR Expenditure FY 201... - Max Bupa Health Insurance Co. Ltd	
Profit Before Tax - FY 201.. :	Rs.....
Profit Before Tax - FY 201.. :	Rs.....
Profit Before Tax - FY 201.. :	Rs.....
Average Profit Before Tax	Rs..... {(.....+ +)/3}
CSR Budget FY 201.. (2% of average PBT)	Rs..... (Rs. * 2%)

Budget - Financial Year 201.. -.. (Rs. Lakhs)							
S No.	Activities	Spend (FY ..)	FY ..	Q1	Q2	Q3	Q4

1	Surgeries & Treatments						
2	Health, Immunization & Blood donation camps						
3	Artificial limbs camp (disability)						
4	Health Centers						
5	Contribution to NGOs working in Health						
6	Health Awareness & Environment						
7	Nutrition & Hygiene						
8	Village Adoption						
9	Mobile Health Clinic						
10	Miscellaneous						
11	Health literacy & volunteering activities						
12	Total						

.....