



Status of Compliance with Stewardship Principle as per the Common Stewardship Code issued by the Authority dated 4th May, 2018 or as may be amended from time to time

Name of the Pension Fund: **Aditya Birla Sun Life Pension Management Limited**

Period of Report: **April 01, 2023 to March 31, 2024**

Sr. No	Particulars of Stewardship Code	Status of Compliance (Complied/not complied)	Relevant details like steps taken for formulation of a policy, date of formulating the policy, date of updation	Remarks/reasons for deviations/noncompliance, if any
1	Principle 1 Pension Funds should formulate a comprehensive policy on the discharge of their stewardship responsibilities publicly disclose it, review and update it periodically.	Complied	We have Board approved comprehensive Stewardship Policy formulated in accordance with the PFRDA circular on Common Stewardship Code. The Policy is reviewed by the Investment Committee and the Board of the Company on yearly basis.	NA
2	Principle 2 Pension Funds should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.	Complied	The Stewardship policy of the Company specifies how to manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.	A list of instances of conflict of interest is provided in Annexure A.
3	Principle 3 Pension Funds has formulated a policy on monitoring of the investee companies by ensuring different	Complied	The Stewardship policy clearly set out comprehensive parameters for monitoring of all the investee	NA



	<p>levels of monitoring in different investee companies and is engaged in monitoring of the investee companies on ongoing basis as guided in circular.</p>		<p>companies irrespective of levels of exposure to the investee company. Further, we monitor all our investee companies on continuous basis. Our credit policy specifies different frequency of review of the investee company based on the various parameter such as industry, promoter, rating etc.</p>	
4	<p>Principle 4 Pension Funds has a clear policy on intervention in their investee companies.</p>	Complied	<p>We have put in place escalation matrix on intervention in investee companies in the Stewardship policy. In case required, the escalation matrix can be triggered.</p>	<p>There were no interventions/escalations necessary in our investee companies during the quarter. (Please refer Annexure B)</p>
5	<p>Principle 4 Pension Funds has a clear policy for collaboration with other institutional investors, where required, to preserve the interests of the ultimate investors, which should be disclosed.</p>	Complied	<p>The Stewardship policy has provision for collaboration with other institutional investors in order to preserve the interests of the ultimate investors.</p>	NA
5	<p>Principle 5 Pension Funds has a clear policy on voting and disclosure of voting activity by taking their own voting decisions in the investee company after in-depth</p>	Complied	<p>The Stewardship policy has clear guidelines on voting norms. We have voted on all resolution except in exceptional cases where there is a conflict of</p>	NA



	analysis rather than blindly supporting the management decisions. PFRDA has already issued a circular dated 20.04.2017 on the matter of Compliance.		interest or lack of information.	
6	Principle 6 Pension Funds has placed a report on implementation of every principle of common stewardship code on its website as per the periodicity decided by the Board of the Pension Fund. Different principles may be disclosed with different periodicities like voting may be disclosed on quarterly basis while implementation of conflict of interest may be disclosed annually and any updation of policy may be disclosed as and when done.	Complied	We have placed a report on implementation of every principle of common stewardship code for FY 2018-19 and 2019-20. We also disclose Voting details on the website on quarterly basis. The updated policy was placed on the website of the Company.	NA
7	Principle 6 The Pension Fund has sent annual intimation to its clients/beneficiaries on implementation of every principle of common stewardship code.	Complied	We have submitted Annual Report on Scheme to respective CRAs for onward submission to client/beneficiaries. We have also submitted the annual report on implementation of every principle of common stewardship code to NPS Trust and	NA



			PFRDA periodically.	
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Annexure A

S.no	Conflict of interest (List of total conflicts as per policy) – <u>Instances</u>	Conflicts occurred during Quarter (Yes/No)	Officials associated with the conflicts occurred (Name & Designation)	Activities performed on occurrence of the conflict	Decision taken related to the officials and Decisioning authority	Decision Rationale
1	Any group company of Aditya Birla Capital group is the shareholder of the investee company	No	NA	NA	NA	NA
2	The investee company is a customer of ABSLPML or its group companies or affiliates	No	NA	NA	NA	NA
3	Investment of Investee Company in Aditya Birla group Companies	Yes	NA	E-Voting on resolutions to be passed by Hindalco Industries Limited & Ultratech Cement Ltd during the period	Abstain from voting	Group Company
4	Any of group companies or affiliates is a supplier or partner in some aspect of the investee company's business	No	NA	NA	NA	NA
5	Key managerial personnel of ABSLPML	No	NA	NA	NA	NA



	may have personal interests that conflict with their responsibility to act in the best interests of the Company. Personal interests include direct interests as well as those of family, friends, or other organizations a person may be involved with. Conflict of interest may be actual or potential and may be financial or nonfinancial in nature					
6	Any instances where the interest of ABSPML and interest of Subscriber diverge from each other	No	NA	NA	NA	NA

Annexure B

Issuer/Company Name	Issues/Subject Matter	Engagement Lead/Co-ordinator	Held at	Engagement and Outcome
NIL				