

Pension Funds

Aditya Birla Sun Life Pension Management Ltd.



**ADITYA BIRLA
CAPITAL**

PROTECTING INVESTING FINANCING ADVISING

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: FY 2022-23

Sr. No.	Particulars of principles 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.	NA
3	Principle 3 Pension Funds has formulated a policy on monitoring of the investee companies by ensuring different levels of monitoring in different investee companies and is engaged in monitoring of the investee companies on ongoing basis as guided in circular.	Complied	The Stewardship policy clearly set out comprehensive parameters for monitoring of all the investee companies irrespective of levels of exposure to the investee company. Further, we monitor all our investee	NA

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			companies on continuous basis. Our credit policy clears specifies different frequency of review of the investee company based on the various parameter such as industry, promoter, rating etc.	
4	Principle 4 Pension Funds has a clear policy on intervention in their investee companies.	Complied	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.	NA
5	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.	Complied	The Stewardship policy has provision for collaboration with other institutional investors in order to preserve the interests of the ultimate investors.	NA
5	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 analysis rather than blindly supporting the management decisions. PFRDA has already issued a circular dated 20.04.2017 on the matter of Compliance.	Complied	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 interest or lack of information.	NA
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	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	NA

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	interest may be disclosed annually and any updation of policy may be disclosed as and when done.		of the Company.	
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 PFRDA periodically.	NA