

11<sup>th</sup> April, 2024

To,  
The Compliance Officer,  
Aditya Birla Sun Life Pension Management Limited,  
One Indiabulls Center, Tower 1,  
16<sup>th</sup> Floor, Jupiter Mill Compound,  
841, Senapati Bapat Marg,  
Elphinstone Road,  
Mumbai – 400013.

**Certificate from the Auditor for the adherence with Voting Policy and Guidelines issued by PFRDA for Aditya Birla Pension management Limited (ABSLPML) for the financial year ended 31<sup>st</sup> March 2024.**

### 1. Introduction

This certificate is issued in our capacity as the Internal Auditor of Pension Fund Schemes managed by Aditya Birla Sun Life Pension Management Limited (“ABSLPML”) (“the PFM”) as requested by the Management of the company and as required under Voting Policy and Guidelines issued by PFRDA dated 20/04/2017 for the purpose of compliance with voting policy on assets held by NPS Trust on behalf of NPS subscribers for the financial year ended 31<sup>st</sup> March, 2024.

### 2. Management’s Responsibility

The Management of the Company is responsible for reviewing and ensuring that it has voted on important decisions that may affect the interest of investors and the rationale recorded for voting decision is prudent and adequate in accordance with PFRDA circular no PFRDA/2017/17/PF/1 dated: 20/04/2017. The Management is also responsible to maintain suitable records to substantiate the adherence to the circular as aforesaid. Further, this responsibility includes ensuring that the relevant records provided to us for our examination are correct and complete.

### 3. Our Responsibility

Our responsibility is to certify whether the PFM has complied with the PFRDA Guidelines for the year ended 31<sup>st</sup> March, 2024.

We conducted our examination in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements.

#### **4. Opinion**

On the basis of verification of relevant records and documents of Aditya Birla Sun Life Pension Management Limited (ABSLPML), we certify that the Company has voted on all important decisions that may affect the interest of investors according to the Guidelines and the consensus was received from the coordinating pension fund except in a few cases mentioned in the enclosed Annexure I where management have abstained from voting.

#### **5. Restriction on Use**

This Certificate has been issued at the request of the Pension Fund solely for the purpose of submission by the Pension Fund to the NPS Trust & PFRDA and should not be used for any other purpose or by any person other than the addressees of this report.

**For JCR & Co. LLP**  
**Chartered Accountants**  
**FRN: 105270W/ W100846**

**Mitesh Chheda**  
**Partner**  
**Mem. No: 160688**  
**UDIN: 24160688BKCAFO9876**  
**Place: Mumbai**

# JCR & CO. LLP

CHARTERED ACCOUNTANTS

## Annexure I

Cases where management have abstained and againts from voting					
Quarter	Total number of Resolutions	For	Against	Abstained	Managements Comment
I	122	119	3	0	NA
II	502	481	10	11	Abstain from voting due to Group Company
III	53	49	4	0	NA
IV	101	97	4	0	NA