

**Annual reporting of compliance status of stewardship code to the Authority**

Name of Pension Fund: HDFC Pension Management Company Limited

Period of Report (FY): April 1, 2019 to March 31, 2020

**Status of Compliance with Stewardship Principles**

Sr. No.	Particulars of Principles of Stewardship Code	Status (Deviation, Partly complied, Not complied)	Reason/ Justification for deviation or non-compliance
1	<p><b>Principle 1</b>  <u>Pension Fund should formulate a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it, review and update it periodically.</u></p>	<p>Complied.   Stewardship Policy was formulated on July 16, 2018 and is publicly disclosed. It is subject to annual review and was last review by Investment Committee and Board in its meeting held on April 19, 2019 respectively. It will be next reviewed by Investment Committee and Board at its meeting to be held on April 23, 2020.</p>	<p>NA</p>
2	<p><b>Principle 2</b>  <u>Pension Fund should have a clear policy on how they manage conflicts of</u></p>	<p>Complied.   Policy on conflict of</p>	<p>NA</p>

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	<u>interest in fulfilling their stewardship responsibilities and publicly disclose it.</u>	interest has been formulated and publicly disclosed as part of stewardship policy.	
3	<b>Principle 3</b> <u>Pension Fund should monitor their investee companies.</u>	Complied.  Investee companies are being monitored on an ongoing basis.	NA
4	<b>Principle 4</b> <u>Pension Fund should have a clear policy on intervention in their investee companies.</u>	Complied.  Policy on intervention in investee companies has been formulated as part of stewardship policy.	NA
5	<b>Principle 5</b> <u>Pension Fund should also have a clear policy for collaboration with other institutional investors where required to preserve the interests of the ultimate investors which should be disclosed.</u>	Complied.  Policy on collaboration with other institutional investors has been formulated and publicly disclosed as part of stewardship policy.	NA
6	<b>Principle 6</b> <u>Pension Fund should have a clear policy on voting and</u>	Complied.  Policy on voting and	NA

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	<u>disclosure of voting activity.</u>	disclosure of voting activity has been separately formulated on October 15, 2015 and publicly disclosed.	