

Annual reporting of compliance status of stewardship code to the Authority

Name of Pension Fund: HDFC Pension Management Company Limited

Period of Report (FY): 2018-2019 (July 16, 2018* to March 31, 2019)

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>Principle 1 <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 has been formulated on July 16, 2018 and is publicly disclosed. It is subject to annual review and will be reviewed by Investment Committee in its meeting to be held on April, 19, 2019.</p>	NA
2	<p>Principle 2 <u>Pension Fund should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.</u></p>	<p>Complied. Policy on conflict of interest has been formulated and publicly disclosed as part of stewardship policy.</p>	NA
3	<p>Principle 3 <u>Pension Fund should monitor their investee companies.</u></p>	<p>Complied. Investee companies are being monitored on an ongoing basis.</p>	NA
4	<p>Principle 4 <u>Pension Fund should have a clear policy on intervention in their investee companies.</u></p>	<p>Complied. Policy on intervention in investee companies has been formulated as part of stewardship policy.</p>	NA

Sr. No.	Particulars of Principles of Stewardship Code	Status (Deviation, Partly complied, Not complied)	Reason/ Justification for deviation or non-compliance
5	<p>Principle 5 <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></p>	<p>Complied. Policy on collaboration with other institutional investors has been formulated and publicly disclosed as part of stewardship policy.</p>	NA
6	<p>Principle 6 <u>Pension Fund should have a clear policy on voting and disclosure of voting activity.</u></p>	<p>Complied. Policy on voting has been formulated on October 15, 2015 and is reviewed annually and disclosure of voting activity has been separately formulated and publicly disclosed.</p>	NA

*Stewardship Policy was framed and approved by the Investment Committee at its meeting held on July16, 2018.