Disclosure under Stewardship Code

In accordance with the Principle 7 of the Stewardship Guidelines of IRDAI, status report on stewardship activities of the Company during the year 2018-19 is given below: -

Sr No.	Particulars of Principles of Stewardship Code	Status (Deviation, Partly complied, Not complied)	Reason/ Justification for deviation or non-compliance
1	Preparation of Stewardship Policy and Public Disclosure	**Complied** Stewardship Policy has been formulated and approved by the board of Directors. The policy is hosted on the website of the Company.	N.A.
2	Managing Conflict of Interest	**Complied** Stewardship Policy of the Company has necessary provisions to manage conflict of interest and fulfill the responsibility.	N.A.
3	Monitoring of Investee Companies	**Complied** Affairs of the Investee companies are monitored as per the Stewardship Policy of the Company.	N.A.
4	Intervention in investee Companies	**Complied** Stewardship Policy adopted by the company has necessary provisions on intervention in investee companies	Owing to default in payment of principal and interest by IL&FS group companies, the Company has filed an intervention Application with Hon'ble NCLAT (National Company Law Appellate Tribunal). The matter is under consideration at NCLAT.

5	Collaboration with other Institutional Investors	**Complied** Provisions are made in the Policy for collaboration with other institutional investors wherever required.	N.A.
6	Voting and disclosure of voting activity	**Complied** Necessary provisions are made in the Policy for exercising voting rights.	The Company has active participation policy in voting wherever it has voting rights of 1% and above in the investee Company or the investment in the investee Company is more than 0.5% of the investment assets. During the year 2018-19, the Company's investment has not exceeded the above said limit in any of the investee company.
7	Reporting of Stewardship Activities	**Complied** Periodic reporting of the Stewardship activities is made available on the website.	N.A.