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# Business Responsibility Report

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## Section A: General Information about the Company

- 1. Corporate Identity Number (CIN) of the Company:** L65190GJ1994PLC021012
- 2. Name of the Company:** ICICI Bank Limited
- 3. Registered address:** Landmark, Race Course Circle, Vadodara-390007
- 4. Website:** [www.icicibank.com](http://www.icicibank.com)
- 5. E-mail id:** companysecretary@icicibank.com
- 6. Financial Year reported:** 2012-2013
- 7. Sector(s) that the Company is engaged in (industrial activity code-wise):** Code: 64191-ICICI Bank is a banking company governed by the Banking Regulation Act, 1949.
- 8. List three key products/services that the Company manufactures/provides:**

ICICI Bank Limited (the Bank), incorporated in Vadodara, India is a publicly held banking company engaged in providing a wide range of banking and financial services including retail banking, corporate banking and treasury operations.
- 9. Total number of locations where business activity is undertaken by the Company**
  - i. Number of International Locations** (Provide details of major 5)

ICICI Bank has banking subsidiaries in the United Kingdom, Canada and Russia, branches in Bahrain, Dubai International Financial Center, Hong Kong, Singapore, Sri Lanka, Qatar Financial Centre and the United States, and representative offices in Bangladesh, China, Indonesia, Malaysia, South Africa, Thailand and the United Arab Emirates. ICICI Bank's subsidiary in the United Kingdom has a branch in Antwerp, Belgium and a branch in Frankfurt, Germany.
  - ii. Number of National Locations**

At March 31, 2013, ICICI Bank had had a network of 3,100 branches and 10,481 ATMs and a presence in 1,752 locations in India.
- 10. Markets served by the Company – Local/State/National/International/**

ICICI Bank serves customers in national and international locations.

## Section B: Financial Details of the Company

- 1. Paid up Capital (INR): ₹ 11.54 billion**
- 2. \*Total Turnover (INR): ₹ 484.21 billion**
- 3. Total profit after taxes (INR): ₹ 83.25 billion**

\*Total turnover represents the sum of "Interest earned" (Schedule 13 of the accounts) and "Other income" (Schedule 14 of the accounts).

**4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)**

During the year ended March 31, 2013 (FY2013), the Bank has spent an amount equivalent to approximately 1.4% of its profit after tax for FY2013 and approximately 1.8% of its average profit after tax the three financial years ending March 31, 2011, March 31, 2012 and March 31, 2013, including expenditure on activities undertaken by the Bank and contributions to the ICICI Foundation for Inclusive Growth.

**5. List of activities in which expenditure in 4 above has been incurred:**

The corporate social responsibility initiatives of the Bank, directly and through the ICICI Foundation for Inclusive Growth focus on elementary education, sustainable livelihoods, primary healthcare and financial inclusion.

## **Section C: Other Details**

**1. Does the Company have any Subsidiary Company/ Companies?**

Yes

**2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)**

The major domestic subsidiaries of the Bank contribute to the corpus of the ICICI Foundation for Inclusive Growth.

**3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]**

No

## **Section D: BR Information**

**1. Details of Director/Directors responsible for BR**

**a) Details of the Director/Director responsible for implementation of the BR policy/policies**

Certain of the principles or components of the principles of the National Voluntary Guidelines (NVGs) on social, environmental and economic responsibilities of business have more relevance to a manufacturing company and the same has been specified under the respective sections. The Company has in place the policies and processes to address such principles of the National Voluntary Guidelines (NVGs) on social, environmental and economic responsibilities of business which are applicable.

- DIN Number: 00066009
- Name: Mr. N. S. Kannan
- Designation: Executive Director & CFO

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### b) Details of the BR head

S. No	Particulars	Details
1	DIN Number (if applicable)	03620913
2	Name	Mr. Sandeep Batra
3	Designation	Group Compliance Officer & Company Secretary
4	Telephone number	022-26537858
5	E-mail id	companysecretary@icicibank.com

### 2. Principle-wise (as per NVGs) BR Policy/policies (Reply in Y/N)

The National Voluntary Guidelines (NVGs) on social, environmental and economic responsibilities of business prescribed by the Ministry of Corporate Affairs advocates the nine principles (detailed below) as P1-P9 to be followed:

P1	Businesses should conduct and govern themselves with Ethics, Transparency and Accountability
P2	Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle
P3	Businesses should promote the wellbeing of all employees
P4	Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
P5	Businesses should respect and promote human rights
P6	Business should respect, protect, and make efforts to restore the environment
P7	Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner
P8	Businesses should support inclusive growth and equitable development
P9	Businesses should engage with and provide value to their customers and consumers in a responsible manner

The principle wise responses are mentioned in the Annexure to this report.

### 2a. If answer to S.No. 1 against any principle, is 'No', please explain why: (Tick up to 2 options)-

Please see Note below \$

S.No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	The company has not understood the Principles									
2.	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3.	The company does not have financial or manpower resources available for the task									
4.	It is planned to be done within next 6 Months									
5.	It is planned to be done within the next 1 year									
6.	Any other reason (please specify)- \$									

\$ The Company has answered "No" for the principles P2, P4, P6, P7 and P8 and the reasons for the same are mentioned in notes P2, P4, P6, P7 and P8 in the Annexure to this report.

### 3. Governance related to BR

- **Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year**

Annually

- **Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?**

This Business Responsibility Report is the first report being published by the Bank and the hyperlink for viewing the report is <http://www.icicibank.com/aboutus/annual.html>.

## Section E: Principle-wise performance

### Principle 1

1. **Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs /Others?**

The Bank is committed to act professionally, fairly and with integrity in all its dealings. The Bank, through the Group Code of Business Conduct & Ethics, has adopted a 'zero-tolerance' approach to bribery and corruption. The Bank has put in place an 'Anti-Bribery and Anti-Corruption Policy', which sets forth obligations on part of every employee for prevention, detection and reporting of any act of bribery or corruption. The Group Code of Business Conduct & Ethics which captures the behavioural and ethical standards along with the 'zero tolerance' towards bribery covers all subsidiaries of the Bank. The Code is applicable to directors and employees of the Bank as well as the directors and employees of the subsidiary companies.

2. **How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management?**

With respect to employees, the Bank has a mechanism as provided under the Whistle Blower Policy whereby employees can raise their concerns. A report on the concerns received and the manner in which they are dealt with is periodically reported to the Audit Committee.

The number of complaints received from shareholders in FY2013 was 127 and all the complaints have been resolved.

### Principle 2

1. **List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities:**

The Bank's Rural & Inclusive Banking Group focuses on rural and below poverty line customers. For details, please refer the "Business Overview" section of the Annual Report. The Bank has also provided concessional/ interest free loans to support other financial inclusion initiatives.

The Bank's Technology Finance Group supports research & development and sanctions assistance to projects in the clean energy and renewable energy sectors.

The ICICI Foundation for Inclusive Growth focuses on the areas of elementary education, sustainable livelihoods, primary healthcare and financial inclusion. For details, please refer the "Promoting Inclusive Growth" section of the Annual Report.

2. **For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):**

Considering the nature of business of the Bank and the products/initiatives referred to above, the questions below are not applicable to the Bank.

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- i. **Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?**

NA

- ii. **Reduction during usage by consumers (energy, water) has been achieved since the previous year?**

NA

3. **Does the company have procedures in place for sustainable sourcing (including transportation)?**

NA

4. **Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?**

**If yes, what steps have been taken to improve their capacity and capability of local and small vendors?**

NA

5. **Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%,5-10%, > 10%). Also, provide details thereof, in about 50 words or so.**

NA

### Principle 3

1. **Please indicate the total number of employees:**

The Bank had 62,065 employees at March 31, 2013.

2. **Please indicate the total number of employees hired on temporary/contractual/casual basis:**

The number of such employees at March 31, 2013 was 715.

3. **Please indicate the number of permanent women employees:**

The Bank had 14,655 women employees at March 31, 2013.

4. **Please indicate the number of permanent employees with disabilities:**

The Bank does not specifically track the number of disabled employees. The Bank is an equal opportunity employer and treats all employees at par. Based on the income tax declarations which enable claiming income tax deduction for self disability, the Bank has approximately 60 such employees.

5. **Do you have an employee association that is recognised by management:**

No

6. **What percentage of your permanent employees are members of this recognised employee association?:**

NA

7. **Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.**

The Bank neither engages in any form of child labour/forced labour/involuntary labour nor adopts any discriminatory employment practices. The Bank has a proper framework for dealing with instances relating to sexual harassment and has resolved all complaints filed during the financial year.

**8. What percentage of your under mentioned employees were given safety and skill up-gradation training in the last year?**

**Permanent employees**

**Permanent women employees**

**Casual/temporary/contractual employees**

**Employees with disabilities**

Employee health and safety is of primary importance to ICICI Bank. The Bank conducts robust and periodic trainings like advanced and basic fire safety training, first aid and Cardio Pulmonary Resuscitation (CPR) training and evacuation related training for floor marshals and employees across its offices and branches. Comprehensive safety training is conducted for women employees where they are trained on situation reaction and self defense and updated on legal provisions relevant to their safety.

The Bank also has training centres, where various training programmes designed to meet the changing skill requirements of its employees are conducted. These training programmes include orientation sessions for new employees, programmes conducted by various functional academies, leadership mentoring programmes and other management development programmes for mid-level and senior executives. In addition to classroom training, e-learning programmes are also available for employees.

Based on the requirements from time to time, the Bank also designs internal leadership mentoring programmes/workshops along with reputed institutions. Leadership engagement sessions are also organised where senior/middle management employees interact with leaders from various domains like management, academics, sports, aeronautics & space and cinematography so as to gain insight into their leadership perspective.

In FY2013, the Bank delivered an average of 8.6 learning & development mandays across all of its 62,065 employees including permanent women employees and employees with disabilities. The total training delivered across class room and e-learning modules aggregated to 531,353 mandays.

The Bank also conducts fire safety training for floor marshals and security staff in large towers and during FY2013, significant number of branches and staff were imparted the training. The Bank also has tie ups with vendors to educate and demonstrate use of fire fighting equipment to branch staff.

On women safety, the Bank has initiated self defence programs which was conducted for women employees in Mumbai and Delhi. Around 19 batches of such program have been organised and dedicated efforts are on to progressively enhance the coverage.

**Principle 4**

**1. Has the company mapped its internal and external stakeholders? Yes/No-**

Yes

**2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalised stakeholders.**

Reserve Bank of India (RBI) has prescribed guidelines on financial inclusion, priority sector lending, lending to weaker section etc which guides the Bank in identifying its disadvantaged, vulnerable and marginalised stakeholders.

**3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.**

The Bank's Rural & Inclusive Banking Group focuses on rural and below poverty line customers. For details, please refer the "Business Overview" section of the Annual Report.

### Principle 5

**1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?**

The Group Code of Business Conduct & Ethics (Code) which is adopted by the Bank and all its subsidiary companies addresses the requirements of this principle. It ensures diversity of workplace through efforts to recruit, develop and retain the most talented people from a diverse candidate pool. It upholds the principle that advancement is based on talent and performance and there is a commitment to equal opportunity. The Code also emphasizes on prohibition of harassment and intimidation and safety at the workplace. It discourages conducts that implies granting or withholding favours or opportunities as a basis for decisions affecting an individual, in return for that individual's compliance.

The Bank follows the code of commitment issued by The Banking Codes and Standards Board of India which covers aspects like good and fair banking practices, transparency in services and products, high operating standards, cordial relationship with consumers and measures which build confidence of the consumer in the banking system.

**2. How many customer complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?**

Off the 3,837 complaints outstanding at the beginning of the year and 101,408 complaints received during the year, 102,617 complaints have been resolved.

### Principle 6

**1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.**

As outlined under Principle 2, the aspects outlined under this Principle are not relevant to the Bank given the nature of its business. The Bank complies with applicable environmental regulations in respect of its premises and operations. Further, the Bank participates in initiatives towards addressing environmental issues.

**2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc. Yes**

Yes, the Bank participates in several initiatives in the area of environmental sustainability. The Bank has been implementing programmes on behalf of the Government of India with the primary objective of reducing emissions and environmental pollution. The Bank has been supporting initiatives in the area of clean technology and energy efficiency by utilising credit lines from various bilateral and multilateral agencies. Some of the critical initiatives that the Bank has taken in this direction over the years include the introduction of environmental management codes (ISO 14000) and clean coal concepts like coal washeries and coal bed methane for the first time in the country. The Bank had also played a significant role in the development of India's first electric passenger car and in setting up the Bureau of Energy Efficiency, India's nodal agency for energy conservation. The Bank had also supported setting up India's first centre to rate green buildings - the Confederation of Indian Industry Green Business Centre at Hyderabad. The Bank supports client companies in their efforts to undertake sustainability initiatives by rendering necessary financial assistance. The Bank has also taken several initiatives such urging customers to opt for e-statements, despatch of annual reports to shareholders in electronic mode and leveraging technology to provide banking services through ATMs, internet and mobile banking, thereby reducing wastage of natural resources as well as time and cost for customers.

**3. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.**

As outlined above, the Bank participates in several initiatives in the area of environment sustainability.

**4. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?**

The above question has limited relevance to the Bank as it is not a manufacturing company. The Bank complies with applicable environmental regulations in respect of its premises and operations.

**5. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.**

The above question has limited relevance to the Bank as it is not a manufacturing company. The Bank complies with applicable environmental regulations in respect of its premises and operations. There were no outstanding notices at March 31, 2013.

**6. Does the company identify and assess potential environmental risks? Y/N**

The Bank complies with applicable environmental regulations in respect of its premises and operations. The Bank is aware of the potential environmental risks and participates in initiatives as mentioned above to address the environmental concerns. The Bank also requires the borrowers of project loans to comply with the various national environmental standards.

**7. Does the company have any project related to Clean Development Mechanism?**

If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?

The above question is not applicable to the Bank as it is not a manufacturing company. However, the Bank assists projects that promote bio diversity and environmental sustainability and projects that reduce green house gas emissions.

**Principle 7**

**1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:**

The Bank is a member of various trade bodies and associations such as the Indian Banks' Association and Confederation of Indian Industry in India and Institute of International Finance.

**2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas ( drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)**

The Bank, through trade bodies and associations, puts forth a number of suggestions with respect to the economy in general and the banking sector in particular. The Bank, directly, and along with the ICICI Foundation for Inclusive Growth has been working on several initiatives for promotion of inclusive growth. The Bank and ICICI Foundation partner with the state governments and other organisations to promote initiatives in the field of elementary education, sustainable livelihoods, primary health and financial inclusion. Further, the Bank provides funding for research & development and clean energy initiatives.

The wholetime Directors and members of senior management participate in various committees/ working groups constituted by the Government of India and the Reserve Bank of India.

**Principle 8**

**1. Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.**

The Bank formulates a financial inclusion plan (FIP) at a 3 year periodicity. The plan is approved by the Board of the Bank. The present FIP for the Bank is for the period FY2014-FY2016 and has been approved by the Board of the Bank at its Meeting held on February 22, 2013. The Bank has also



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disaggregated its Board approved FIP targets for FY2014-16 to its controlling offices across various states.

The FIP interalia covers the following aspects:

- Quantitative plan for delivery of relevant suite of products and services
- Coverage through Bank branches and Business Correspondents (BC)
- Business models under BC
- Leveraging technology and identity solutions of the Unique Identity Authority of India (UIDAI) to cater to the identified customer segments
- Monitoring and review mechanism for implementation of FIP

For further details on initiatives taken by Rural & Inclusive Banking Group, please refer the “Business Overview” section of this Annual Report. The Bank has also provided concessional/ interest free loans to support other financial inclusion initiatives.

The ICICI Foundation for Inclusive Growth focuses on the areas of elementary education, sustainable livelihoods, primary healthcare and financial inclusion. For details, please refer the “Promoting Inclusive Growth” section of this Annual Report.

### **2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?**

The projects/ programmes are undertaken primarily through in-house teams and the ICICI Foundation for Inclusive Growth, with the assistance of implementation partners as required.

### **3. Have you done any impact assessment of your initiative?**

The Bank through its financial inclusion initiatives for serving the rural, unbanked and below poverty line customers is providing access to banking and financial services to a significant number of customers, providing them access to savings and credit products. The results of these initiatives are reviewed periodically. In addition, the ICICI Foundation for Inclusive Growth assesses the impact of all programmes undertaken by it. Baseline and endline research studies, process documentation and impact evaluation are carried out for the initiatives undertaken by ICICI Foundation.

### **4. What is your company’s direct contribution to community development projects- Amount in INR and the details of the projects undertaken.**

The Bank directly undertakes activities in the area of financial inclusion. The Bank has incurred expenditure directly and made contributions to the ICICI Foundation for Inclusive Growth, aggregating ₹ 1.19 billion in fiscal 2013. The Bank has established an extensive network of rural branches, including Gramin branches in unbanked villages, as well as Business Correspondent touchpoints for providing access to banking services to customers in rural areas. The activities of the Bank include, among others, micro-savings products and transfer of government scheme payments directly to the beneficiaries’ bank accounts. The Bank makes contributions to the corpus of the ICICI Foundation for Inclusive Growth which focuses primarily on elementary education, healthcare and sustainable livelihoods. The Foundation’s work includes projects with State Governments to improve the quality of education in State-run schools and a pilot project to provide insured outpatient healthcare to individuals from below the poverty line. The Bank has also provided donations, grants and concessional financial assistance to other entities working on financial inclusion and other areas.

### **5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.**

The Bank, through its various financial inclusion initiatives mentioned in this report, is expanding its outreach to rural and semi-urban markets and providing financial solutions to customers in this market. The banking and the financial services being provided by the Bank to the unbanked and below poverty line customers is providing an opportunity to the target customers to improve their

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livelihoods. The products and services of the Bank have been well received by the customers in the target segment. With regard to ICICI Foundation for Inclusive Growth, community development forms the core of all its initiatives. The programmes are designed to reflect the needs of each target population. ICICI Foundation encourages the active engagement of key stakeholders such as the Governments, NGOs, Panchayati Raj Institutions (PRIs), communities and other local institutions in the project planning and implementation to facilitate developing and building community ownership while ensuring the sustainability of the programmes.

### **Principle 9**

**1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.**

The Bank resolved 97.4% of customer complaints/consumer cases during the year.

**2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information).**

This aspect is not applicable as the Bank is not a manufacturing company. The Bank complies with disclosure requirements relating to its products and services.

**3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.**

In the ordinary course of banking business, several customers and borrowers have disputes with the Bank which could result in their filing a civil suit, criminal complaint or a consumer complaint alleging deficiency of services. The Bank always strives to have a cordial relationship with its customers / borrowers and attempts to have an amicable settlement of the dispute but in some cases needs to pursue legal resolution of the same.

**4. Did your Company carry out any consumer survey/consumer satisfaction trends?**

ICICI Bank believes in measuring the satisfaction levels of customers on a continuous basis across various touch points. FOCUS (Feedback on Customer Service), is a mechanism devised to gauge the customer's feedback and satisfaction levels. Approximately 50,000 customers are contacted every month for their feedback. This feedback is analysed and insights from the same are implemented to enhance service quality.

The Bank also conducts a detailed Customer Satisfaction Study (C-SAT) once every three years. Existing customers of various products are met for a detailed interview where their feedback regarding the product and the channel experience is obtained.

The Bank has also constituted the branch level customer service forum - MILAP. This acts as a forum to enable interaction between the Bank's senior managers and the customers with the prime objective of obtaining customer feedback.

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### Annexure

S.No.	Questions	P1	P2- Please refer Note P2	P3	P4- Please refer Note P4	P5- Please refer Note P5	P6- Please refer Note P6	P7- Please refer Note P7	P8- Please refer Note P8	P9- Please refer Note P9
1.	Do you have a policy/ policies for...	Y	N	Y	N	Y	N	N	N	Y
2.	Has the policy been formulated in consultation with the relevant stakeholders?	Y	-	Y	-	Y	-	-	-	Y
3.	Does the policy conform to any national /international standards? If yes, specify? (50 words) -Please refer Note P1	Y	-	Y	-	Y	-	-	-	Y
4.	Has the policy been approved by the Board? If yes, has it been signed by MD/owner/ CEO/appropriate Board Director?	Y	-	Y	-	Y	-	-	-	Y
5.	Does the Company have a specified committee of the Board/Director/ Official to oversee the implementation of the policy	Y	-	Y	-	Y	-	-	-	Y
6.	Indicate the link for the policy to be viewed online? Please refer Note P1	Y	-	Y	-	Y	-	-	-	Y
7.	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	-	Y	-	Y	-	-	-	Y
8.	Does the company have in-house structure to implement the policy/policies.	Y	-	Y	-	Y	-	-	-	Y
9.	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/policies?	Y	-	Y	-	Y	-	-	-	Y
10.	Has the company carried out independent audit/evaluation of the working of this policy by an internal or external agency? Please see #	Y	-	Y	-	Y	-	-	-	Y

P1	<p>Sr No 3-The Bank has an Anti Bribery &amp; Anti Corruption Policy, Group Code of Business Conduct and Ethics and Whistle Blower Policy. The Anti-Bribery &amp; Anti-Corruption Policy broadly conforms to the requirements of anti-bribery statutes and the regulatory guidance issued in relation to the same. While the corporate governance requirements prescribed under the Listing Agreement require the Bank to have a Code of Conduct, there is no prescribed standard for the same. The Group Code of Business Conduct and Ethics is based on professional and ethical standards which the Bank believes all its employees should adopt. The Whistle Blower Policy broadly conforms to the standards set by the Protected Disclosure Scheme of Reserve Bank of India. Sr No 6- The Group Code of Business Conduct and Ethics is available on the website at <a href="http://www.icicibank.com/aboutus/pdf/code_of_business_conduct_ethics.pdf">http://www.icicibank.com/aboutus/pdf/code_of_business_conduct_ethics.pdf</a>. The other policies are internal documents and accessible only to employees of the organisation.</p>
P2	<p>Considering the nature of the Bank's business, this Principle has limited applicability to the Bank. The Bank complies with regulations governing its products and services and has taken initiatives to promote inclusive growth and environmental sustainability.</p>
P3	<p>Sr No 3- In line with the general laws and regulations and sound ethical practices followed nationally, the Bank has adopted employee oriented policies covering areas such as employee benefits and sexual harassment at the workplace which endeavour to provide an environment of care, nurturing and opportunity to accomplish professional aspirations. Sr No 6- These policies can be viewed online only by the employees of the organisation.</p>
P4	<p>The principle enunciates the aspect of being responsive towards all stakeholders especially those who are disadvantaged, vulnerable and marginalized. While the Bank does not have a specific policy in place for this, the Bank is mandated by guidelines issued by RBI on priority sector lending and financial inclusion through which various measures are being taken by the Bank to promote the well being of the disadvantaged and vulnerable stakeholders. The Bank has set processes in place to achieve the objectives addressed by this principle. In addition, the ICICI Foundation for Inclusive Growth works towards inclusive growth through interventions in areas like elementary education, sustainable livelihoods and healthcare.</p>
P5	<p>"Sr No 3- The Group Code of Business Conduct &amp; Ethics (Code) which has been adopted by the Bank and all its subsidiary companies addresses the requirements of this principle. The Code emphasizes fair employment practices &amp; diversity, fair competition, prohibition of harassment &amp; intimidation and safety at the workplace. The Bank follows the Code of Commitment based on the standards issued by the Banking Codes and Standards Board of India which covers aspects like good and fair banking practices, transparency in services and products, high operating standards and cordial relationship with customers. The Bank is an equal opportunity employer and believes in providing a safe workplace and an enabling work environment to its employees. Sr No 6- The Group Code of Business Conduct and Ethics is available on the website at <a href="http://www.icicibank.com/aboutus/pdf/code_of_business_conduct_ethics.pdf">http://www.icicibank.com/aboutus/pdf/code_of_business_conduct_ethics.pdf</a>. The Code of Commitment is available at the Bank's branches and made available to customers on their request."</p>
P6	<p>The aspects outlined under this Principle are not relevant to the Bank given the nature of its business. The Bank complies with applicable environmental regulations in respect of its premises and operations. Further, the Bank participates in initiatives towards addressing environmental issues. The Bank also requires the borrowers of project loans to comply with the various national environmental standards.</p>
P7	<p>While there is no specific policy outlined for this principle, the Bank, through trade bodies and associations, puts forth a number of suggestions with respect to the economy in general and the banking sector in particular. The Bank, directly, and along with the ICICI Foundation for Inclusive Growth has been working on several initiatives for promotion of inclusive growth.</p>
P8	<p>"While there is no specific policy outlined for this principle, the Bank's Rural &amp; Inclusive Banking Group focuses on rural and below poverty line customers. The ICICI Foundation for Inclusive Growth focuses on the areas of elementary education, sustainable livelihoods, primary healthcare and financial inclusion."</p>
P9	<p>"Sr No 3: The Bank has a Customer Grievance Redressal Policy and a Customer Compensation Policy which conform to the guidelines issued by Reserve Bank of India Sr No 6- The two policies can be viewed online on <a href="http://www.icicibank.com/notice-board/customer-grievance-redressal-policy.pdf">http://www.icicibank.com/notice-board/customer-grievance-redressal-policy.pdf</a> <a href="http://www.icicibank.com/Personal-Banking/pdf/Board_Approved_Compensation_Policy.pdf">http://www.icicibank.com/Personal-Banking/pdf/Board_Approved_Compensation_Policy.pdf</a>"</p>
#	<p>All policies and processes are subject to audits and reviews done internally in the Bank from time to time</p>