Risk Policy of LICPFL

Version No. 02 HLY/2025-26
RMC Meeting dated 23.01.2026
Board Meeting dated 29.01.2026

LIC PENSION FUND LIMITED

"RISK POLICY (Reviewed as on 23.01.2026)"

PURPOSE AND OBJECTIVE

LIC Pension Fund Ltd. (LICPFL/Company) was incorporated on 21.11.2007 under the Companies Act, 1956 as a Public Limited Company and received Certificate for commencement of business from the Registrar of Companies, Maharashtra on 08.01.2008. It is engaged in the business of investment management of the pension corpus received from NPS Trust and regulated by the Pension Fund Regulatory and Development Authority (PFRDA). As per the Investment Management Agreement (IMA) entered into with the NPS Trust, the Company is required to have a Risk Management Policy duly approved by the Board of Directors.

First risk policy of LIC Pension Fund Limited (LICPFL) was approved by the Board at its meeting held on 12th June 2008. The revised Risk Policy was approved at the Board Meeting held on 01.03.2016, based on the recommendations made by the Risk Management Committee (RMC) in its meeting held on 23.12.2015.

The 30th RMC reviewed and recommended the revision of the Risk Policy in its meeting dated 20.06.2017. As recommended by the 30th RMC, the Revised Risk Policy was approved in the 41st Board Meeting held on 10.08.2017.

The 37th RMC in its meeting held on 28.03.2019 reviewed and recommended revision of the Risk Policy and the revised Risk Policy was approved in the 49th Board Meeting held on 24.04.2019.

The 66th RMC in its meeting held on 23rd January 2026 reviewed and recommended revision of the Risk Policy and the revised Risk Policy was approved in the 79th Board Meeting held on 29th January 2025

Primary objective of the Company is to generate optimal returns with minimum risk to its subscribers within the regulations and guidelines issued by the PFRDA from time to time, in accordance with provisions of IMA and internal guidelines framed by the company within the ambit of above regulations and guidelines. (PFRDA has issued revised investment guidelines on 10th December 2025 for Govt. Sector and Private Sector NPS respectively).

RISK MANAGEMENT

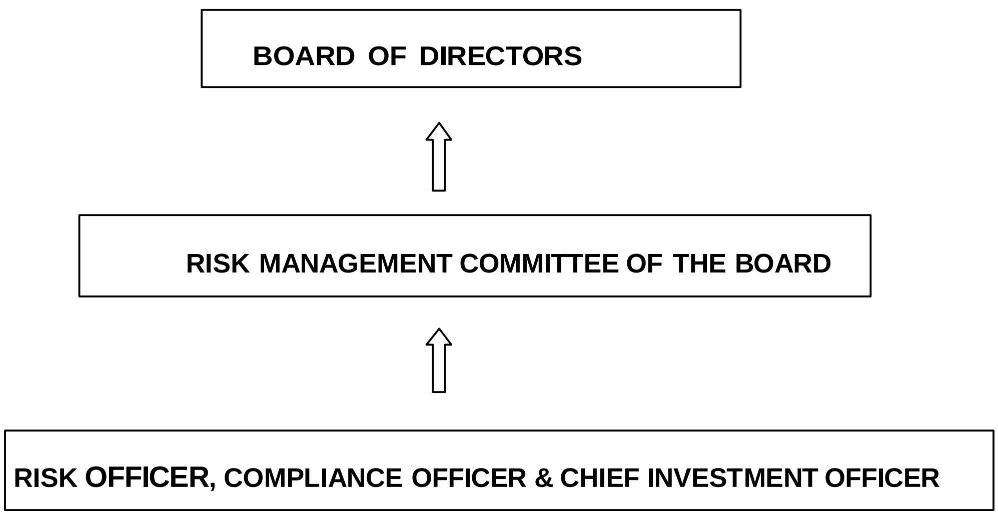
Risk is defined as the potential deviation from the expected outcome. In all investments, there is the potential for events and consequences that constitute threats to success (downside). Risk is an integral part of any investment function. Risk Management involves identification of these risks on continuous basis and evolving methodologies to address the same in a scientific and effective manner in order to protect the subscribers' funds and generate optimal return thereon.

Risk Management Process adopted by the Company seeks to address investment risks associated with the financial assets under its management by identifying, measuring and mitigating identified risks.

RISK ORGANISATION

As specified in the Schedule VI of IMA, a Risk Management Committee (RMC) consisting of at least one independent director (not the same as the one on the Investment Committee), the Chief Executive Officer, Chief Investment Officer and the Risk/Compliance Officer shall be formed.

Risk management organization structure is as follows: -



RISK IDENTIFICATION

1. The Company is prone to **External and Internal** business risks.

   A. **External risks** involve risks arising from the external environment over which the Company does not have any control and which may have a direct/indirect impact on investments. Instances of such risks include sudden/gradual changes in global macroeconomic factors, exchange rate fluctuations, political upheavals leading to uncertainty regarding implementation of economic reforms, governance issues, changes in domestic interest rate outlook, impact of measures adopted by RBI to control inflation or exchange rate fluctuations, change/s in regulatory stipulations/guidelines and change/s in business environment in general. Natural disasters or sudden power failure extending over a period of time also form part of external risks which threaten business continuity.

B. **Internal risks** involve risks due to various internal factors. Risks may be broadly categorized in three dimensions;

(i) **Key Activity Risk.** This would include credit risk and market risk. Market risk further encompasses interest rate risk and liquidity risk. It also includes risk of crossing exposure limits due to market fluctuations.

(ii) **Execution Process Risk.** This would include errors in execution of investment deals, short delivery of equity shares, settlement problems, NAV and asset pricing errors.

(iii) **Operation Risk, Competition Risk and Other Risks.** This would include risk of non- compliance with regulatory requirements leading to censure and/ or penalties. Competition risk can arise on account of expanding Pension Markets and opening up of Industry to Private Players. Other Risks include failure of critical systems and infrastructure, obsolete systems, Critical knowledge loss, Shortage of Skill sets/Mismatch, Asset Liability Mismatch.

RISK ASSESSMENT AND MITIGATION MEASURES

The steps proposed to contain risk for each of the above areas across three dimensions: Funds Management, Execution and Operations, are discussed in detail. The measures for specific risks in each area have been listed. These measures shall be considered minimum standard of risk management system, and need to be reviewed and upgraded on regular basis.

KEY ACTIVITY RISK

Nature of Risks

The Company invests in G-Sec, Debt, Equity, AIF and ETF's . There is risk of higher volatility in price performance due to global/domestic macroeconomic factors, this would also include credit risk and market risk. Market risk further encompass interest rate risk and liquidity risk. It also includes Risk of crossing exposure Limits due to market fluctuations.

- Lower returns as compared to benchmark/peer group
- Concentration risk
- Interest rate Risk,

- Reinvestment Risk,
- Credit Risk,
- Liquidity Risk,
- Introduction of fresh investment/valuation norms for existing schemes by the regulator necessitating changes in investment strategy and valuation methodology.

Monitoring and Control

The Company shall have a documented investment policy which should:

- Define its Investment strategy, risk appetite i.e. the amount of risk it is willing to take as part of its Investment strategy.
- Define the investment process and proposed steps to deal with interest rate risk, credit risk and market risk.
- Define limits and mechanism for monitoring limits at various levels, asset class, industry sector, security, counterparty etc. consistent with IMA & PFRDA guidelines.
- Outline the reporting system for internal monitoring through MIS reports and its frequency and reports to be submitted to the regulators and its frequency.
- Define exceptions and their monitoring.
- Include relevant rules and regulations for appointment, control and monitoring equity brokers/intermediaries.
- Provide guidelines for transactions involving inter-scheme transfers.
- Define investment norms for Equity, Central/State Government securities and based on credit ratings for debt instruments like Bonds/Debentures/Commercial Papers/certificate of deposits/short term money market instruments/others.
- Define exit strategy for equity & debt securities, having a stop loss policy in place.

- Periodical review of quality of assets on the basis of financials/rating in case of NCD's and on the basis of financials as well as market information and price movements in case of equity.

The Company shall have an Internal Investment Committee which will be responsible for:

- Carrying out the day to day fund management activities in line with the company's investment policy and philosophy with regard to different asset classes, sectors, counter- parties, etc. as defined in the investment policy.
- Reviewing performance and positions with regard to the objective of the schemes
- Researching and reviewing counterparties including buyers / sellers, intermediaries like brokers and debt issuers with regard to credit risk.

The Internal Investment Committee shall report to Investment Management Committee of the Board about investments made, exceptions/departures if any, made from IMA / internal investment guidelines. Details of investment shall also be reported to the Risk Management Committee and the Board about deterioration in quality of debt assets due to rating downgrades, and equity assets due to Index migration and various other developments which significantly influence the risk to the existing portfolio, and seek strategic guidance for fund management.

EXECUTION PROCESS RISK

Nature of Risks

- Errors in execution of investment deals, short delivery of equity shares.
- Settlement problems,
- NAV and valuation errors,
- Fraud.

Monitoring and Control

- Adherence to all regulatory guidelines and code of conduct
- Declaration of NAVs and uploading the same on CRA and Company website.
- Non-allowance of dealing through personal cell phones of dealers.
- Recording facilities in the dealing room.
- Guidelines to facilitate execution of best deals. Regular follow up with custodians for making good short delivery and compensation wherever applicable.
- Periodical review of systems and procedures.
- Receipt of daily position reports from the custodian
- Service level agreements with custodians, including clauses that protect the funds and investors from settlement errors by the custodian.
- Fund management section of the Company shall monitor inflow and outflow of the funds from scheme bank accounts and ensure investment of surplus funds in liquid schemes of mutual funds/money market instruments on a daily basis. All necessary measures should be taken to prevent the funds from remaining idle.
- The Company shall maintain and proactively monitor credit information on all counterparties and counterparty limits to avoid default on settlements.
- The Company shall have an arrangement with the Custodian to receive the following reports from them as and when required.
- Purchase/Sale report in respect of Equity. Corporate actions report, intimation regarding bonus, stock split etc.
- Purchase/Sale/redemption report of Government securities held in CSGL account with the custodian.
- Purchase / Sale / Redemption report in respect of Debt.
- Funds statement position from the bank servicing scheme accounts
- Internal audit of periodic compliances and audit checks on the NAV calculation.
- Valuation of debt instruments as per PFRDA guidelines.
- Audit and Review of all financial reporting including systems & procedures by internal auditors and external auditors to ensure transparency and accuracy.
- Internal audit to ensure required functionality of regulatory requirements.
- Adequate disclosure in the financial statements with regard to off-balance sheet items and contingent liabilities.
- Adherence to all regulatory guidelines with regard to personal trading, insider trading and front running.
- Personal trading policy and code of conduct, which shall be signed off by all employees at regular intervals, and continuous communications
- Any action on the part of employees may attract suitable action under the LIC staff regulation/ LIC PFL HR Policy, as may be the case, and penalties may be imposed as per the relevant applicable clauses.
- Periodical training and information to all employees on compliance issues an policies on personal trading and fraud.

OPERATION RISK COMPETITION RISK AND OTHER RISKS

Nature of Risks

- Risk of Non- compliance with regulatory requirements leading to censure and/ or penalities
- Failure of critical systems and infrastructure, obsolete systems.
- Critical knowledge loss/Skills shortage,
- Potential business loss/Competition
- Asset Liability Mismatch Risk
- Third Party Risks

Monitoring and Control

- The Company shall adhere to all PFRDA regulations with regard to the immediate reporting to PFRDA/NPS Trust of any instance of non-compliance by the company as well as periodic reporting. Compliance training for all new employees. The regulatory limits and restrictions shall be incorporated in the systems as far as possible, to avoid any instance of regulatory violation. However, in some cases, due to change in the guidelines governing investment pattern of schemes, it is difficult to immediately comply with the new guidelines. In such cases, to avoid the risk of non- compliance and resulting strictures/penalties likely to be imposed by the regulator, a reasonable time for complying with the guidelines should be sought from the PFRDA.

- Disaster recovery site of Investment Management Solution to be set up at a location which is in a different seismic zone as standby in case of sudden crash or any other problem arising in the active server. LIC Pension fund Ltd. has a Disaster Recovery set up at Hyderabad, wherein the data from the production server at Mumbai gets replicated to server located at Hyderabad on real time basis. In the event of disaster at Data Centre in Mumbai, the Company's Mumbai office shall invoke the failover server at Hyderabad and continue its operations.

- A Physical backup of Investment Management system at Mumbai shall be taken as per company's defined back up policy. A daily backup of the Company Accounts software shall be taken on an external hard disk and stored at the residence of the Chief Information Security Officer (CISO).

- To mitigate the risk of sudden power failure lasting for longer period hampering the capability of the Company to declare daily NAV, a connection to UPS for taking over immediately after power failure has been installed. UPS shall be kept on standby mode. This will ensure un-interrupted power supply for smooth working and compliance of daily

  NAV requirement stipulated by PFRDA. This arrangement shall be tested periodically and reviewed as and when necessary.

In case of unforeseen calamity also the following two activities are to be performed:

a) Placing of the funds in mutual funds.
b) Declaring the NAV.

- Well documented policies which is easy to understand for newly inducted people, ensuring that new incumbents are having finance, investment or fund management background. Plan shall aim to identify and build a second line for Key positions, and also address alternatives in case of key employees are going on leave. All- important processes shall be well documented, including its inter dependencies with other processes skill sets/equipment's required, special guidelines and precautions to be observed. Appropriate training and development of alternate staff in critical/key activities shall be in place.

REVIEW OF RISK MANAGEMENT FUNCTION

Board of Directors: -

The Board shall provide the overall guidance on Risk Management Function:

- Provide necessary oversight on key risks and measures
- Approve risk policy and review risk management policy/strategy as and when required but at least twice in a year.
- Approve risk appetite of the company as and when required but at least once in a year.
- Further, all important matters which, in the view of Risk Management Committee require further strategic intervention from the Board, would be brought to its knowledge in its ensuing periodical meetings.

RISK MANAGEMENT COMMITTEE.

In line with the guidelines stated in Schedule VI of the Investment Management Agreement signed by the Company with the NPS Trust, Risk Management Committee (RMC) shall be constituted consisting of at least one independent director (not the same as the one on the Investment Committee), the Chief Executive Officer, Chief investment Officer, the Risk Officer and the Compliance Officer. The constitution of the committee shall be reviewed periodically as and when change of members is necessitated due to retirement/transfer etc.

The RMC shall

- Review the risk appetite and the risk mitigation plans for the risks assessed as significant.
- Review the industry/sector wise portfolio risk.
- Identify strategic risks emanating from changes in business environment and regulations
- Oversee and monitor the company's compliance to regulatory requirements.
- Refer to Investment Management Committee of the Board

suggestion/recommendations for corrective action for risk minimization.

To enable the RMC to discharge its Review and Oversight functions effectively, it shall be provided with various reporting mechanism detailed as follows: -

RISK MONITORING & REPORTING FUNCTION

The Company shall maintain a Risk Register for recording the risks identified by various sections during the year and at the time of review of risk policy, shall place before the RMC the details of new risks identified due to change in regulations, market conditions or any other reasons and proposed steps to be taken for mitigation of the above risks.

The Risk Management Committee meeting should be convened at regular intervals, and in any case not less than four times annually, to consider the following:

- Portfolio exposure & valuation.
- Concentration risk on the total portfolio, sector/group wise for each month for total period under consideration.
- Investment norms compliance, deviations if any and the reasons thereof.
- Macro-economic factors affecting the equity and debt markets, impact on the portfolio and future course of action to minimize the adverse effect of these movements is to be discussed and suggestions for consideration of Investment committee may be made.

The RMC should submit a review report to the Board analyzing the following: -

- Asset allocation for each scheme as at end of the month for the period under consideration.
- Absolute and percentage exposure to Central and State government securities, equity, debt including public/corporate debt, money market instruments vis-à-vis investment pattern stipulated by the regulator.

The Risk officer should submit a Risk report to RMC for monitoring various aspects of risks in the management of pension funds for observation and further guidance which includes the following: -

- A brief review of movements in equity and debt market.
- Scheme wise portfolio analysis in various categories as at end of each month for the period under consideration. Extent of diversification in equity investments giving sector wise appreciation/depreciation and breakup of investments in various debt instruments.
- Details of rating migration in case of debt assets and index migration in case of equity assets and steps proposed to reduce the exposure in such cases.
- Percentage of exposure in each category against investment pattern and deviation if any as also reasons thereof, rating migration of debt portfolio in the above period.
- Disaster recovery and Business continuity plan (BCP) –The report shall include - summary of drills conducted, key findings and observations, status of mitigation actions and overall assessment of DR and BCP effectiveness.
- Insurance cover
- Regulatory changes induced risk
- Business continuity risk

Risk report should be placed before the Board for perusal and advice in the subsequent Board meeting. To enable the Risk officer to analyses & prepare various reports, concerned department of the Company shall provide necessary data in the required format.

INTERNAL AUDIT

Internal auditors of the Company shall be appointed by the Board of the Company (based on the recommendations of the Audit Committee) to carry out internal audit on quarterly basis for company accounts and scheme accounts separately internal and internal audit reports shall be placed before the Audit Committee and the Board. Comments of internal auditors relevant from risk angle shall be brought to the notice of Audit Committee as also RMC for recommendations if any to the Board.

PERFORMANCE AUDIT OF SCHEMES

Till 2011-12, performance audit of the schemes was conducted by auditors appointed by the NPS Trust and the report and its compliance were placed before the Audit Committee and the Board. As per recent guidelines issued by the PFRDA, statutory auditors for schemes shall be appointed by the NPS Trust and fee shall be borne by the Company. Report submitted by these auditors shall be placed before the Audit Committee for recommendation and the Board for approval.

STATUTORY AUDIT OF COMPANY ACCOUNTS

Since LIC Pension Fund Ltd. is a wholly owned subsidiary of LIC of India which in turn is owned by the Central government, from 2011-12, the company accounts are being audited by auditors appointed by Comptroller and Auditor General of India. (CAG). Statutory auditors for scheme accounts shall be appointed by NPS trust. Comments of auditors relevant from risk angle shall be brought to the notice of Audit Committee & RMC for recommendations if any to the Board.

REVIEW OF RISK POLICY

The Risk policy shall be reviewed on half-yearly basis. In case the Risk Management Committee feels that the same needs to be reviewed due to changes in regulations or any other reason, the same may be reviewed more frequently.

RISK REGISTER

A Risk Register shall be maintained and periodically reviewed by the Risk Management Committee. Any additional/ new risk that is identified shall be immediately entered in the Risk Register and the same will be brought to the notice of the Risk Management Committee in the next meeting. The mitigation measures should be implemented in a time bound manner.

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