

## Concentrix India CSR Policy

### 1.0 Title and Applicability

1. Concentrix India ('Company') has developed a Policy comprising the Company's philosophy for delineating its responsibility as a corporate citizen and lays down the principles and mechanisms for undertaking various programs in accordance with section 135 of the Companies Act 2013 for the community at large, is titled as the 'CONCENTRIX INDIA CSR Policy' (Policy).
2. The Policy shall apply to all the CSR programs and activities undertaken by the Company at various locations for the benefit of diverse sectors of the society.

### 2.0 Validity of CSR Policy

The Board may amend the CSR policy as may be required from time to time as per their need and requirement

### 3.0 CSR Program Areas & Objectives

The Company will primarily focus on the following programs as part of its CSR:

**1. Education:** The primary objective of the company is to improve the availability, quality education infrastructure with emphasis on girls and differently abled people.

**Objective:** The main task of schools is to provide education which involves a series of programs and activities. The successful conduct of these programs and activities depends mainly upon the availability of proper infrastructure in the school. Improved infrastructure makes it attractive and inviting for children to regularly attend the school which will also enhance their participation in lessons and significantly improve learning levels.

**2. Vocational Training:** The primary objective of the program is to enable the company is to help fulfill the country's growing need for skilled manpower.

**Objective:** The 12<sup>th</sup> Five Year Plan views skill development and vocational training as an instrument to empower the youth and marginalized. It is with this objective The Company will develop programs in conjunction with suitable partners to provide vocational training to women, differently abled and other vulnerable communities. Our Company aims to work with organizations who cater to the needs of such groups and communities.

**3. Road Safety:** The primary objective of this program will be to spread awareness on the road safety in and around Delhi NCR. India has one of the highest road related fatalities in the world and as a responsible corporate citizen, the Company hopes to help do its part in reducing the incidence of accidents and promote road safety.

**Objective:** Our Company will work with relevant stakeholders like the city traffic police, Company employees and civil society organisations to spread awareness and advocacy relating to road related accidents. The areas around the Company's operations witness a high volume of cars and pedestrians and different types of public transport.

- 4. Disaster Relief and Rehabilitation:** Every year, countless people in our country are left homeless and destitute due to the widescale destruction caused by the numerous natural disasters that occur.

**Objective:** To contribute towards disaster relief and help in rehabilitation efforts by responding to humanitarian needs through able implementation partners on the ground or by contributing to the Prime Ministers Relief fund or other organisations that are working to ensure that affected communities are reached and assistance is provided.

## 5.0 CSR Budget

1. The Board of Company plans that in each year the Company spends on CSR as per the Company's Vision including such sum of money as per the regulatory requirements of the country.
2. The Company may collaborate or pool resources with other organisations (its subsidiary companies) to undertake CSR activities, provided that the CSR Committee of the company should be in a position to separately report on such projects or programs in accordance with the CSR rules.

## 6.0 Implementation

- ❖ CSR program will be undertaken by the Company within the defined ambit of Base Line Survey and Need Assessment (if deemed necessary by the Company)
- ❖ The time period/duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program.
- ❖ The Company may enter into partnerships with the government, business partners and communities to create multiplier effect of its social projects.
- ❖ The mode of implementation of CSR programs may include a combination of direct implementation and implementation through trust/foundation/society set up by the Company and partners such as NGOs, business partners, registered societies etc. The Company will select its partners after appropriate due diligence.
- ❖ The Company may use the services of expert agencies, consultancy firms etc. wherever required for carrying out base line surveys, guidance on project design and implementation, impact assessment surveys etc.
- ❖ The teams responsible for implementing the various CSR projects are mentioned in the section on the Governance Structure of the Policy.

## 7.0 CSR Governance Structure



## 8.0 Roles and responsibilities

### The Board:

The Board of Directors of the Company will be responsible for:

- ❖ the approval of the CSR Policy of the Company
- ❖ disclosing the content of the Policy in its report and place the Policy on the Company's website in such a manner as prescribed under Section 135 of the Companies Act 2013 read with the CSR Rules
- ❖ ensuring that the social projects included in the Policy are undertaken by the Company
- ❖ ensuring that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects
- ❖ ensuring that it specifies the reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount

## CSR Committee:

- 1. Composition of the the CSR committee:** The members of the CSR Committee shall be the directors of the Company appointed by the Board from time to time.
- 2. Responsibility of the CSR Committee:**
  - ❖ formulate and recommend the CSR Policy to the Board for approval
  - ❖ monitor the Policy from time to time
  - ❖ Evaluate and approve the expenditure to be incurred on CSR projects
  - ❖ constitute a transparent monitoring mechanism for ensuring implementation of the CSR projects

## Implementation Partner:

- 1. Responsibility of the Implementation Partners:**
  - ❖ The Implementation partners will be responsible for on ground assessment of the project(s), coordination with the NGOs and stakeholders
  - ❖ The Implementation partners will be responsible for timely execution and monitoring of the projects
  - ❖ The Implementation partners will plan annual budgets for CSR projects in coordination with the implementing partners and make a proposal to the CSR Committee
  - ❖ The Implementation partners will report to the CSR Committee the progress on CSR projects and status of CSR expenditure once in each quarter
  - ❖ The Implementation partners will be responsible for documentation and reporting of all CSR activities of the Company in pursuit of the Companies Act and the CSR Rules

## 9.0 Monitoring and Reporting Framework

### Project Monitoring:

The Company will institute a well-defined monitoring and evaluation mechanism to ensure that each CSR program has:

1. clear objectives developed out of the societal needs that are determined through baselines studies and research
2. clear targets, time lines and measureable parameters wherever possible
3. a progress monitoring and reporting framework that is aligned with the requirements of the section 135 of the Companies Act and the CSR Rules

The CSR progress monitoring authorities and the frequency of review is given below.

S. No.	CSR Progress Review and Monitoring Authority	Frequency of review
1	Board of Directors	Annually or as and when recommended by the CSR committee to the Board.
2	CSR Committee	Annually or at CSR committee meetings (whichever is earlier)
3	Implementation partners	Annually, if required

#### **Budget monitoring:**

The Company will establish an accounting system to ensure project wise accounting of CSR spends.

#### **Reporting Framework:**

The Company will monitor progress on CSR projects and CSR spend and report to the CSR committee half yearly.

The Company will report CSR performance in its annual report as per the structure and format prescribed in the notified CSR Rules.