

# Headstrong Services India Private Limited

Corporate Social  
Responsibility  
(CSR) Policy



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## 1. Introduction and background

Genpact (NYSE: G) group is a global professional services firm delivering the outcomes that transform our clients' businesses and shape their future. We're guided by our real-world experience redesigning and running thousands of processes for hundreds of global companies. Our clients – including many in the Global Fortune 500 – partner with us for our unique ability to combine deep industry and functional expertise, leading talent, and proven methodologies to drive collaborative innovation that turns insights into action and delivers outcomes at scale. We create lasting competitive advantages for our clients and their customers, running digitally enabled operations and applying our Data-Tech-AI services to design, build, and transform their businesses. And we do it all with purpose. From New York to New Delhi and more than 30 countries in between, our 1,40,000+ team is passionate in its relentless pursuit of a world that works better for people. Get to know us at [Genpact.com](https://www.genpact.com) and on [LinkedIn](#), [Twitter](#), [YouTube](#), and [Facebook](#).

The policy is valid till the next change and subject to necessary approvals for any amendments.

## 2. CSR philosophy

Corporate Social Responsibility (CSR) has a critical role to play in shaping the company's success. As the company grows, it will harness the energy and talent of its employees and leverage its distinctive strengths to contribute to the economic, social, well-being, and environmental betterment of our communities. The company's special focus and pillars are on development through Better Access & Better Planet.

### **Better Access:**

- Better Access to Health
- Better Access to Education & Employability
- Better Access to Opportunity

**Better Planet:** Towards creating a sustainable & resilient world

## 3. Objectives of the policy

Headstrong Services India Private Limited's (Genpact) CSR policy emphasizes Genpact's commitment to giving back to the community through projects and initiatives under two pillars that align with our strengths, core expertise, and “causes” that the employees are passionate about:

- Better Access

- Better Planet

Under each pillar, the company runs projects in partnership with institutional/Non-Governmental Organizations (NGO) Section 8 company/Registered Public Trust/Registered Society organizations and where relevant - directly. The primary pillars of the CSR strategy enable us to create an impact in the country and community.

### **3.1 Pillar 1 - Better Access**

#### **3.1.1 To Health**

We prioritize health and well-being, focusing on eradicating hunger, poverty, and malnutrition. We aim to provide access to nutritious food for vulnerable communities, including infants, children, and women. Our various initiatives and volunteering drives include preventive healthcare services and promotion of maternal and child health. Additionally, we collaborate with organizations working across health education programs and supporting emergency medical response efforts.

#### **3.1.2 To Education and Employability**

As a people-focused company, providing inclusive and equitable education is our top priority. We achieve this through supporting schools, providing children with education and supplies, and leveraging technology to raise education-specific awareness within communities. By making use of applications and digital dashboards, we disseminate information to make education more accessible and engaging. Further, we facilitate sessions with youth and adults to improve their employability, integrating technology into our training programs for enhanced livelihood opportunities. One of the ways we do this is by training and up-skilling unemployed and underemployed youth, enabling them to secure jobs and improve their quality of life. We also work towards enabling women to succeed in their chosen paths with an aim to accelerate gender equality across the country.

#### **3.1.3 To Opportunity**

At Genpact, we leverage our people, power and process excellence to generate a sustainable social impact through partaking in community development projects. The Better World Initiative lends our digital capabilities and process skills to the social sector at no cost. The focus is to help social organizations maximize their socio-economic impact on the communities they serve to create a systemic change. It is designed to deliver strategic and long-term meaningful programs in the social sector by offering process excellence support to non-profits in India and empowering them to achieve their organizational goals.

## 3.2 Pillar 2 – Better Planet

At Genpact, we deeply care for the environment and help conserve it through well-planned initiatives involving multiple stakeholders. We're passionate about creating a more sustainable, resilient world and are committed to creating our environmental impact through energy and water management, waste management, thereby reducing our carbon footprint and combating climate change. Our projects focus on sustainable agriculture, water and landscape conservation, water management practices, building institutional capacity through climate action related training, disaster management etc.

## 4. Thematic areas of intervention

The company will focus on ensuring healthy lives, nutrition, and well-being for all; providing inclusive and equitable quality education; gender equality and livelihood enhancement; building the capability of social organizations, and individuals and ensuring environment sustainability; reducing our carbon footprint and combating climate change.

*However, the Company may also undertake CSR activities in line with other areas mentioned in Schedule VII of the Companies Act, 2013 ('the Act') including items incorporated as per amendment to Schedule VII through subsequent notifications, circulars, etc. released by the appropriate authority.*

The thematic areas of intervention will be aligned to Schedule VII of the Act, national priorities, and Sustainable Development Goals (SDG).

**Refer to Annexure 1: List of our CSR Projects for FY 2024-25**

## 5. Geography of Intervention

The Company would carry out interventions preferably in and around its operations and where the Company has a presence in India. Additionally, the Board may decide from time to time to work in any other areas (geography / thematic area) based on the needs identified by the CSR Committee.

## 6. Guiding principles

To have a holistic approach towards CSR, the company shall have the below guiding principles with respect to selection, implementation, and monitoring of activities. Further, a

comprehensive annual action plan shall be formulated and followed to track the CSR efforts of the Company. The guiding principle for all CSR activities shall be aligned with the company's vision and mission of saving and sustaining the lives of the communities it serves. Further, the CSR efforts shall be centered around the below principles:

- Compliance with CSR Rules and Act (including any further amendments)
- Alignment to societal needs
- Activities shall be measurable and impactful
- Creating a shared value for the beneficiaries

## **6.1 Selection**

All project activities shall be selected based on the alignment towards the Company's vision and mission followed by the societal needs. The same shall be validated through a needs assessment/baseline study before selecting the project.

## **6.2 Mode of implementation**

The Company will implement its CSR Projects through a combination of direct implementation and/or with the support of implementing agency(s). The Company will select its implementing agency after appropriate due diligence and compliance with the requirements as specified in the Act.

The implementing agency will either be:-

- A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other Company; or
- A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 and having an established track record of at least three years in undertaking similar activities; or
- A Company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- Any entity established under an Act of Parliament or a State legislature;

The Company may use services of expert agencies, consultancy firms, academic institutions, or such other third-party organizations, wherever required, for carrying out surveys, guidance on project design, implementation, impact assessment, etc.

The Company may also contribute to incubators or R&D related research projects or to specified bodies undertaking R&D related research as mentioned in Schedule VII of the Act, if recommended by the CSR Committee.

### **6.3 Project Planning and Monitoring**

The Company shall give preference to the planning stage for the identification and implementation of its CSR projects to ensure optimal utilization of the CSR Budget.

All CSR projects shall include components such as:

- Clearly defined objectives developed out of existing societal needs or determined through baselines or secondary studies or research, where considered necessary;
- Identification of target group and beneficiaries, both direct and extended;
- Milestones and timelines;
- Annual financial allocation;
- Robust monitoring system;
- Process to carry out impact assessments; and
- Reporting framework

The Company shall monitor and evaluate its strategic projects to track financial and programmatic progress.

For our various programs, we shall use the principles of human-centric design thinking to map all relevant stakeholders and arrive at the short- and long-term indicators and targets.

## **7. Formulation of Annual Action Plan**

The CSR Annual Action plan in pursuance of its CSR policy, shall include the following, namely: -

- (a) The list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;

- (b) The manner of execution of such projects or programs as specified in sub-rule (1) of rule 4 of CSR Rules, 2014 (CSR Rules);
- (c) The modalities of utilization of funds and implementation schedules for the projects or programs;
- (d) Monitoring and reporting mechanism for the projects or programs;
- (e) Details of needs and impact assessment, if any, for the projects undertaken by the company. The Annual Action Plan of the Company may be modified, during the financial year, with the approval of the board, based on reasonable justification to that effect.

## **8. Governance structure**

It is important to emphasize the company's unwavering commitment to integrity and ethical business practices. We aim to always conduct business the right way and integrity is a fundamental principle of our work ethos. Genpact will implement its CSR activities, governance, monitoring, and reporting in accordance with Section 135 of the Act, and the rules notified thereafter. Accordingly, a CSR Committee has been formed with three directors who will report to the Board of Directors. The responsibility of the CSR Committee will include:

- Formulating and recommending the CSR Policy in compliance with the Act;
- Recommending projects to be undertaken as per Schedule VII of the Act;
- Formulation of an Annual Action Plan in line with the CSR Policy and recommending the same to the Board;
- Recommending to the Board on the proposed CSR Expenditure to be incurred during the financial year;
- Monitoring the implementation of CSR Policy;
- Identifying and engaging with implementing agencies/third parties for effective implementation of the CSR Policy;
- Constitute a transparent monitoring mechanism for ensuring the implementation of the CSR projects undertaken by the Company;
- Reporting to the Board on the progress of the various CSR projects and spending on a regular basis; and
- Suggesting modifications of the CSR Policy to the Board

The Board of the Company will be responsible for:

- Setting up the CSR Committee as per the Act;
- Approving the CSR policy as formulated by the CSR Committee;
- Approving the annual action plan recommended by the CSR Committee



- Ensuring that in each financial year the Company spends at least 2% of the average net profit made during the three immediate preceding financial years;
- Ensuring that every financial year the funds committed by the Company for CSR Projects / Programs are utilized effectively, and regularly monitoring implementation;
- To ensure that administrative overheads shall not exceed five percent of the total prescribed CSR expenditure for the respective financial year;
- For ongoing project/s, the Board shall monitor the implementation of the project concerning the approved timelines and year-wise allocation and shall be responsible for making modifications, if required for smooth implementation of the project within the overall permissible period;
- Disclosing the composition of CSR Committee, CSR policy and approved projects on Company's website and in the Board's report;
- Ensuring annual reporting of CSR Policy to the Ministry of Corporate Affairs, Government of India, as per the prescribed format, if required
- Specifying the reasons for not spending the amount in the Board's report, if the company fails to spend such amount
- Transferring the unspent amount, if any, to separate bank account in case of ongoing project or to specified funds (in other cases) as mentioned in CSR regulations within the prescribed time limit

If required, the Committee may create a team for assistance in implementation of CSR activities, which will work under the supervision and direction of the Committee. The CSR implementation team will comprise of personnel directly involved in the execution and monitoring of the projects to ensure effective utilization of funds, expected outcomes, and timely report submission to the Committee and the Board.

**The CSR Implementation team will be responsible for the following:**

- Identifying CSR projects in line with Schedule VII of the Act and Genpact's CSR strategy;
- Conducting Due diligence to shortlist implementation partners;
- Recommending projects to the Committee and the Board for consideration ;
- Monitoring and execution of the projects on the ground and regular interfacing and reviews with partners for effective implementation as per a prescribed governance structure;
- Regular feedback, review, and report to the CSR Committee and the CSR Board;
- Any other activities necessary to run the CSR programs of the company; and

- Assistance in undertaking impact assessment as per the CSR Committee and CSR Board approval

There will be a yearly review or reviews as deemed fit by the CSR Committee, and periodic reporting of all projects and programs, by the CSR Committee to the Board.

### **Importance of Governance at Genpact:**

We have a rigorous governance and audit mechanism for everything we do. We strongly believe that “what gets measured gets done.” Our CSR governance mechanism involves review and monitoring at different levels of the organization comprised of the CSR board, CSR committee, and CSR implementation team consisting of senior leadership.

## **9. Reporting**

The Company shall report on its CSR activities as format prescribed under CSR regulations. Further, details of this policy, composition of the CSR Committee, and projects approved by the Board shall be disclosed on the Company's website.

## **10. CSR Budget**

The CSR Committee will propose the annual budgeted expenditure (project-wise) to the Board for its consideration and approval.

### **10.1 Treatment of surplus**

Any surplus arising out of the CSR activities will not form part of the business profit and will be plowed back into the same project or shall be transferred to the Unspent CSR account and spent in pursuance of CSR policy and annual action plan of the company or transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

If the amount spent is in excess of requirement provided under sub-section (5) of section 135, such excess amount will be set off against the requirement to spend under sub-section (5) of section 135 up to the immediate succeeding three financial years subject to the conditions that-

(a) The excess amount available for set-off shall not include the surplus arising out of the CSR activities, if any, in pursuance of Rule 7 of CSR Rules

(b) The Board of the company shall pass a resolution to this effect.

## **10.2 Creation/Acquisition of capital assets**

The CSR amount may be spent by a company for the creation or acquisition of a capital asset, which shall be held by –

- (a) A company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under Rule 4(2) of CSR Rules or
- (b) Beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- (c) A public authority

## **10.3 Transfer of unspent CSR amount**

In the event that any CSR funds remain unspent, the Board in its report shall specify the reasons for not spending the said amount. However, if such unspent CSR funds do not relate to any Ongoing Project, such unspent funds shall be transferred to an account specified under Schedule VII of the Act, within a period of six (6) months of the expiry of the financial year.

In the event that any CSR funds remain unspent pursuant to the Ongoing Project, the Company shall transfer such unspent CSR Funds to its Unspent Corporate Social Responsibility Account, within 30 (thirty) days from the end of the financial year. Such unspent CSR funds shall then be spent by the terms of this CSR Policy.

### **CSR Committee –**

Mr. Dinesh Agarwal, Director

Ms. Daisy Khanna, Director

### [Annexure-List of CSR Projects for Financial Year \(FY\) 24-25](#)

# Thank You

For further information, please contact:

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