

Concentrix India CSR Policy

June 13, 2022

1.0 Title and Applicability

1. The Board of Directors of Concentrix Daksh Services India Private Limited (“CNX IN-Daksh”), Concentrix Services India Private Limited (“CNX IN-Services”), Concentrix Technologies (India) Private Limited (“CNX IN-Tech), Convergys India Services Private Limited (“CNXC IN1”) and ProKarma Softech Private Limited (“ProKarma-IN”) (*Collectively referred to as “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 Purpose of the Policy

Objectives:

1. To define the approach towards Corporate Social Responsibility (“CSR”) of the Company.
2. To identify the broad areas within which company shall undertake its CSR initiatives.
3. To set out the governance structure, manner and magnitude of funding, utilization of CSR funds, and treatment of surplus CSR funds (if any).

4.0 CSR Program Scope & Objectives

Scope of this CSR policy will include all activities mentioned under Schedule VII of the Companies Act, 2013 as amended from time to time, and such other projects/programs which the Board may deem fit.

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 organizations (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 measurable 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.

10.0 Annual Action Plan

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

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy read with applicable provisions of the Companies Act, 2013 and rules made thereunder, as amended from time to time. The Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

The CSR Annual Action Plan shall include the following:-

- (a) list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act,
- (b) manner of execution of such projects or programmes,
- (c) modalities of utilisation of funds and implementation schedules for the projects or programmes,
- (d) monitoring and reporting mechanism for the projects or programmes and
- (e) details of need and impact assessment, if any, for the projects undertaken by the company