



**Headstrong
Services India
Private Limited**

Corporate Social
Responsibility
(CSR) Policy





Headstrong Services India Private Ltd

Table of contents

1. Introduction and background	3
2. CSR philosophy	3
3. Objectives of the policy	3
3.1. Pillar 1 - Better access	4
3.1.1. To health	4
3.1.2. To education and opportunity	4
3.2. Pillar 2 – Better planet.....	5
4. Thematic areas of intervention	5
5. Geography of intervention	6
6. Guiding principles	6
6.1. Selection.....	6
6.2. Mode of implementation.....	7
6.3. Project planning and monitoring	7
7. Formulation of annual action plan	8
8. Governance structure.....	8
9. Reporting	11
10. CSR Budget	11
10.1. Treatment of surplus.....	11
10.2. Creation/Acquisition of capital assets.....	11
10.3. Transfer of unspent CSR amount	12



Headstrong Services India Private Ltd

1. Introduction and background

Genpact (NYSE: G) is an agentic and advanced technology solutions company. We leverage process intelligence and artificial intelligence to deliver measurable outcomes. With a strong partner ecosystem and decades of client trust, we provide innovative solutions that transform how businesses run. Powered by a team with an active learning mindset and client centricity at its core, we deliver lasting value for the world's leading enterprises.

We are committed in our 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:

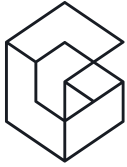
- Better Access to Health
- Better Access to Education & Opportunity

Better Planet: Towards creating a sustainable & resilient world

3. Objectives of the policy

Headstrong India Private Limited's (HSIPL) CSR policy emphasizes Company'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 management and employees are passionate about:

- Better Access



Headstrong Services India Private Ltd

- **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 within the country and community.

3.1. Pillar 1 - Better access

3.1.1. To health

We intend to prioritize health and well-being by addressing the social and systemic determinants of health, with a focus on reducing hunger, poverty, and malnutrition. Some of our interventions will aim to improve access to nutritious food and essential healthcare services for vulnerable and underserved communities, including infants, children, adults – men, women and the elderly. Our initiatives and volunteering efforts will also focus on health awareness and education, WASH (Water, sanitation and hygiene) programs, and strengthening of healthcare infrastructure to improve community level health outcomes. We will also endeavor to support preventive, diagnostic and curative healthcare services targeting both communicable and non-communicable diseases, with specific emphasis on maternal and child health, nutrition, fitness, and early disease detection.

The Company will collaborate with organizations working to implement health programs leveraging technology, data, and digital tools to enable improved screening, monitoring and outreach. Additionally, we shall strive to promote child fitness and well-being through sports and physical activity initiatives and also extend support to emergency medical response and disaster relief efforts, ensuring timely and effective healthcare access during crises

3.1.2. To education and opportunity

As a people-focused company, we will remain committed to advancing inclusive, equitable, and quality education as one of our top priorities. Some of our initiatives and volunteering efforts will be designed to support children (particularly girls), women, and youth, with a focused emphasis on improving access to learning, reducing educational disparities, and enabling meaningful livelihood and employment opportunities.

We shall support some components of the education continuum for strengthening schools, which will include establishment of infrastructure (establishment of STEM labs, digital classrooms), provision of learning resources, financial assistance, mentoring, and teacher capability building to enhance pedagogical quality and digital-readiness. Special emphasis will be placed on promoting women's participation in STEM (Science, Technology,



Headstrong Services India Private Ltd

engineering and mathematics) through targeted outreach, mentoring, role-model-driven programs

Our interventions shall extend beyond formal education to include youth skilling, vocational training, and livelihood development programs with focus on employability skills, entrepreneurship, and workforce readiness. These programs shall integrate financial literacy, digital literacy, and soft skills to enable participants to acquire industry relevant skills for improving income-generation potential

We will further enable access to education through scholarships, financial assistance, mentoring, and career guidance, particularly for underserved and high-potential learners. By leveraging technology-enabled platforms, digital tools, and data-driven program design, we aim to enhance reach, monitor outcomes, and ensure that education and skilling interventions translate into sustainable livelihoods and economic self-reliance

3.2. Pillar 2 – Better planet

We remain committed to environmental stewardship and sustainable development through well-planned initiatives and volunteering efforts aimed at building a more sustainable resilient and climate-responsible ecosystem by addressing key environmental challenges

Some of our interventions will emphasize environmental awareness, sustainable livelihoods, renewable energy adoption, water conservation and management, plantation drives, and lakes and water rejuvenation, thereby contributing to reduced carbon footprint and climate change mitigation. We plan to undertake some projects that promote sustainable agriculture, biodiversity conservation, and protection of flora and fauna including strengthening institutional and community capacity through climate action-related training, disaster preparedness, and environmental risk mitigation initiatives. By integrating technology, data-driven approaches, and best practices, we seek to work towards improving environmental risk prediction, monitoring, resource efficiency, and long-term sustainability outcomes

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; 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



Headstrong Services India Private Ltd

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).

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 centred around the below principles:

- Compliance with CSR Rules and Act (including any further amendments)
- Alignment to societal needs
- Measurable and impactful activities
- 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.



Headstrong Services India Private Ltd

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 or section 10(23C) 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 or section 10(23C) 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 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 towards achieving community impact.

Planning and monitoring process will comprise of:

- Laying down Clearly defined objectives, for projects, 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
- Defining Milestones and timelines for projects
- Annual financial allocation for every project
- Robust monitoring system with measurable outcomes



Headstrong Services India Private Ltd

- Conducting Field visits
- Process to carry out impact assessments and voluntary audits
- Creating reporting framework with well-defined measurable indicators for activity, output, outcome and impact – Company will create Logical Framework Matrix for each project to define targets and track KPIs. Monitoring data will be collected periodically from implementing agencies which will be tracked and analyzed using digital tool/dashboard.

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, monitoring, impact assessment, etc.

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. We will implement CSR activities, governance,



Headstrong Services India Private Ltd

monitoring, and reporting in accordance with Section 135 of the Act, and the rules notified thereafter.

We have a rigorous governance and audit mechanism for everything we do. 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.

Accordingly, a CSR Committee has been formed with two 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 monitoring spending on a regular basis; and
- Suggesting modifications in 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 the implementation



Headstrong Services India Private Ltd

- 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 to the Ministry of Corporate Affairs, Government of India, as per the prescribed formats
- 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 HSIPL'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 Board's approval



Headstrong Services India Private Ltd

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.

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.

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

10. CSR Budget

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 –



Headstrong Services India Private Ltd

- (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

[Refer to Annexure for list of Projects: CSR Projects for FY 2025-26](#)



Thank you

For further information, please contact:

Rachna Chugh

Vice President, Corporate Social Responsibility

E rachna.chugh@genpact.com

W www.genpact.com