



Rightpoint India Digital Private Limited

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CIN: U74999RJ2018FTC060657

Rightpoint India Digital Private Limited

Corporate Social Responsibility Policy

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1. Introduction and background


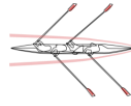




Rightpoint, a Genpact company (NYSE: G) is a global experience company. Rightpoint India Digital Private Limited is exclusively providing engineering services like development & maintenance of website, management of the server, development of mobile application and other digital operations including quality assurance to its holding company, Rightpoint Consulting LLC.

Our diverse teams lead with empathy, data, and creativity—always in service of the experience. From whiteboard to roll-out, we help our clients embed experience across their operations from front to back office to accelerate digital transformation through a human-centric lens. Rightpoint has been recognized among the top customer experience consultancies in The Forrester Wave™: Customer Experience Strategy Consulting Practices, Q4 2020.

These are our values: At Rightpoint, we are creative, authentic, and scrappy problem solvers. We partner with our clients to craft meaningful experiences at the intersection of empathy and technology.

Internal Vision Statement & Values:
At Rightpoint, we are creative, authentic, and scrappy problem solvers.

We partner with our clients to craft meaningful experiences at the intersection of empathy and technology.

 Integrity	 Collaboration	 Empathy
 Curiosity	 Authenticity	 Resourcefulness

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

Genpact's 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.

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3.1.4 To Care and Support for the Elderly

We are dedicated to enhancing the quality of life for our senior citizens by providing top-notch healthcare, nutritious meals, and a safe and supportive living environment. Our comprehensive initiatives include regular medical check-ups, mental health support, and engaging social activities to alleviate loneliness and foster a sense of community. By partnering with reputable elderly care organizations, we ensure that our elders receive the dignity, respect, and care they deserve. Our commitment is to make every senior feel valued and cherished, empowering them to lead fulfilling lives with confidence and grace.

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 governments, 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 Schedule VII 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 Company.

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 national priorities & SDG'S
- 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 in alignment with the thematic areas as per Schedule VII of the Companies Act, 2013. 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 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.

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

7. Formulation of Annual Action Plan

This CSR Policy, details of the composition of the CSR Core team and projects approved by the Board shall be hosted on the Company's website. 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.
- 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 need and impact assessment, if any, for the projects undertaken by the company.

f) During any financial year, the Annual Action Plan of the Group may be modified with approval of the board, with reasonable justification to that effect, the Board shall ensure that the CSR activities are undertaken by the Group through:

- 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, 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.
- Any entity established under an Act of Parliament or a State legislature; or
 - Presentation of Project / Program Details.
 - Scheduling of disbursements of funds relating to the Projects or Programs and monitoring system in accordance with pre-agreed milestones with partners.
 - The CSR Core team whilst making any contribution will specify the activities for which it is made, the amount for the same and the time period for the activity.

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

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 by Section 135 of the Companies Act 2013, and the rules notified thereafter. Accordingly, a CSR Core Team has been formed with two directors who will report to the Board of Directors. The responsibility of the CSR Core team will include:

- Formulating the CSR Policy in compliance with the Companies Act;
- Identifying projects to be undertaken as per Schedule VII of the Act;
- Formulation of an Annual Action Plan in line with the CSR Policy which will include a list of approved CSR projects, modalities of implementation and fund utilization, timelines, monitoring & reporting mechanism, and details of needs & impact assessment (if applicable);
- 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 company will implement its CSR programs and projects either directly or through institutional partners permissible as per the Companies Act requirements.

The CSR implementation team will comprise 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 Core team and the Board.

The Board of the Company will be responsible for:

- Setting up the CSR Core Team as per the Act;
- Approving the CSR policy as formulated by the CSR Core team;
- 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 in its Annual Report the names of CSR Core team members, and the content of the CSR policy and ensure annual reporting of its CSR Projects / Programs on the Company website; and
- Ensuring annual reporting of CSR Policy to the Ministry of Corporate Affairs, Government of India, as per the prescribed format, if required

The CSR Implementation team will be responsible for the following:

- Identifying CSR projects in line with Schedule VII of the Companies Act and the Genpact's CSR strategy;
- Due diligence to identify implementation partners;
- Recommending projects and spending to the Core team and the Board for approval;
- 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 Core team and the CSR Board; and
- Any other activities to run the CSR programs of the company; and
- Post completion of the project and if applicable If applicable to be done by a third party & not the implementing team of Genpact. There will be a yearly review or reviews as deemed fit by the CSR Board and reporting of all projects and programs, by the CSR Core team to the Board. The CSR Core team will prepare the annual CSR report to be included in the report of the Board of Directors.

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 Core team, and senior leadership team.

We also monitor and evaluate our strategic projects to track financial and programmatic progress.

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

9 Reporting

The Company shall report on its CSR activities as per the updated annual disclosure format on CSR mandated by the amendments in the Act.

10 . CSR Budget

The CSR Core team will propose the annual budgeted expenditure project-wise to the Board for its consideration and approval. The company will report the reasons for spending if any.

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 transfer such surplus amount 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 sub-rule (2) of this rule
- (b) The Board of the company shall pass a resolution to that 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 sub-rule (2) of rule 4; or
- (b) Beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- (c) A public authority:

Provided that any capital asset created by a company before the commencement of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, shall within a period of one hundred and eighty days from such commencement comply with the requirement of this rule, which may be extended by a further period of not more than ninety days with the approval of the Board based on reasonable justification.

10.3 Transfer of unspent CSR amount

Until a fund is specified in Schedule VII for subsection (5) and (6) of Section 135 of the Act, the unspent CSR amount, if any, will be transferred to any fund included in Schedule VII of the Act.”.

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 Group 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 Core team –

1. Sameera Bharadwaj, Director of Rightpoint India
2. Divya Jain, Senior Director-TSG
3. Abhishek Bhardwaj, Senior Manager-Finance
4. Ishwar Singh Shekhawat, Operation Specialist

[Annexure- List of CSR Projects for 2025-26](#)