

A.T. Kearney India Private Limited ('ATKIPL' / 'Company')

Corporate Social Responsibility (CSR) Policy

1.0 Title and applicability

- 1.1 As per the provisions of section 135 of the Companies Act, 2013 (CA, 2013), ATKIPL is obligated to spend 2% of its net profits on CSR activities.
- 1.2 Among other obligations, the above-mentioned provisions mandate the Company to lay out its CSR policy and also set up a CSR framework ('CSR committee') to duly discharge its statutory obligations.
- 1.3 In due compliance with the provisions of CA, 2013, ATKIPL has devised its CSR policy. ATKIPL CSR policy is driven by its corporate philosophy which delineates ATKIPL Group's overall social responsibility as a corporate citizen and the specific areas in which it seeks to make relevant contributions to the society.
- 1.4 The policy shall apply to all the CSR programs and activities undertaken by the Company at various locations.

2.0 CSR philosophy

Globally, A.T. Kearney group's CSR policy centers around the following three E's:

- I. Economic development
- II. Environment and sustainability
- III. Education and workforce

- 2.1 As an organization, ATKIPL believes that sustained economic development cannot happen without social progress and the well-being of local communities. With this mindset, ATKIPL always endeavors to go beyond its business focus and contribute to the well-being of all stakeholders, including the community at large.
- 2.2 Businesses that adopt a sustainability mindset have an unprecedented opportunity to gain competitive advantage while improving our world. As a part of its environmental sustainability measure, ATKIPL intends to ably contribute toward bringing down energy costs and reducing carbon emissions in the environments in which it operates.

2.3 The world has been changing at a faster pace due to changes in the education method and rapid advancement of technology. Accordingly, there is an ever increasing need to upgrade the teaching content and methods. Education and skill development is another key area where ATKIPL expects to play an important role as per its group's philosophy.

3.0 CSR vision statement

To actively contribute in the areas of economic development, environment and sustainability, and education and workforce.

4.0 Validity of CSR policy

The CSR policy is expected to be followed year after year. The board may, however, amend the CSR policy as may be required from time to time as per their need and requirement.

5.0 CSR program areas and objectives

ATKIPL shall focus its CSR activities in the following thematic areas:

- I. Development of local communities (empowering communities (women/children) through specified measures)
- II. Promotion of education and skill development
- III. Enhancement of environmental sustainability
- IV. Contribution toward Prime Minister's National Relief Fund

Details of CSR programs executed by ATKIPL in the previously mentioned thematic areas are enclosed as **Annexure - 1**.

ATKIPL will discharge its CSR obligations on its own, and also in participation with implementation partners which are expected to be various foundations/trusts/Section 8 companies and other similar bodies that specialize in effective implementation of the previously mentioned activities.

A part of ATKIPL's CSR obligation can be discharged through contributions to various funds (e.g. Prime Minister's National Relief fund, Swachh Bharat Kosh, etc.)

6.0 CSR expenditure

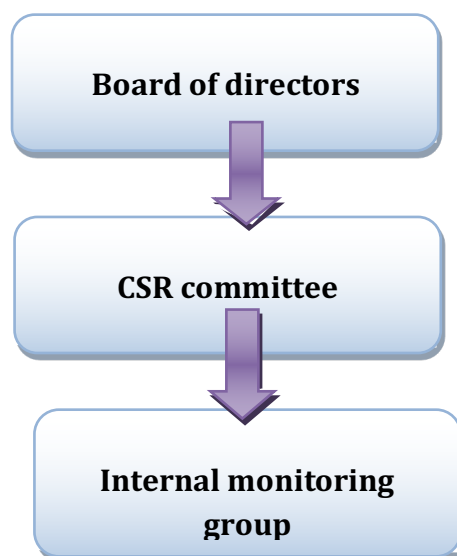
- 6.1 The board of Company shall ensure that in each financial year, the Company spends at least 2% of the average net profit (before tax) made during the immediate three preceding financial years. Average net profit shall mean the net profits of the Company as per the profit and loss statement prepared in accordance with the CA, 2013.
- 6.2 CSR expenditure shall mean all expenditure incurred with respect to specific projects/programs relating to the approved CSR activities.
- 6.3 CSR expenditure shall not include expenditure on an item not in conformity or in line with the activities which fall within the purview of the CSR activities listed in Schedule VII of the Companies Act, 2013.
- 6.4 CSR expenditure shall not include projects or programs or activities undertaken outside India.
- 6.5 Any surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company. Further, the Company may collaborate or pool resources with other organizations to plan, implement, monitor, and report CSR activities.
- 6.6 The board shall approve the allocation of the CSR expenditure on the CSR activities and, to the extent possible, shall give priority to the local areas wherever ATKIPL has its operations.

7.0 Implementation mechanism

- 7.1 The mode of implementation of CSR programs will include a combination of direct and indirect implementation, depending upon the nature of the project, i.e. execution of certain projects by the CSR team (as identified in Section 8) and certain projects through ATKIPL implementation partners (IPs), including registered trust/society/Section 8 companies.
- 7.2 IPs shall be selected after an adequate due diligence process is completed. The Company shall ensure that the IPs have an established track record of at least three years in undertaking project/programs in the focus areas identified by ATKIPL. ATKIPL may also use the services of expert agencies, consultancy firms, etc., wherever required for carrying out baseline surveys, guidance on CSR program design and implementation, impact assessment surveys, etc.

7.3 The Company's CSR activities may also include contributions to various funds such as the Prime Minister's National Relief fund, Swachh Bharat Kosh, etc.

8.0 CSR governance structure



9.0 Roles and responsibilities

The board:

The board of directors of the Company will be responsible for:

- 9.1 Approval of the CSR policy and CSR expenditure after taking into consideration the recommendation made by the CSR committee
- 9.2 Ensuring CSR spending every financial year of at least 2% of average net profits made during immediately preceding three financial years, in pursuance with the policy
- 9.3 Ensuring that the CSR activities included in the CSR policy are undertaken by ATKIPL and that such activities are related to the activities specified in Schedule VII of the Companies Act, 2013
- 9.4 Disclosing the content of the policy in its report and placing 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

9.5 Director's report will include the following:

- a) Content of the CSR policy and composition of the CSR committee

- b) An annual report on the CSR
- c) Reasons for failure (if any) to spend required amount on CSR activities

CSR committee:

- a) The composition of the CSR committee of the board is:

S. No.	Name	Designation/category
1	Shikha Gupta	Director
2	Rakhee Malik	Director
3	Abhinav Chauhan	Director

- b) **Responsibility of the CSR committee:**

- Formulating and recommending the CSR activities/programs to be undertaken by ATKIPL
- Reviewing CSR activities undertaken by ATKIPL
- Monitoring the policy from time to time
- Recommending the amount of expenditure to be incurred on CSR projects
- Constituting a transparent monitoring mechanism for ensuring implementation of the CSR projects
- Preparing a note on CSR activities undertaken for ATKIPL and submitting such report to the board of directors

Internal monitoring group:

- a) The composition of the internal monitoring group of the Company is:

S. No.	Name	Designation/category
1	Ragini Malhotra	Practice insights manager
2	Mahaveer Bisht	Global knowledge director
3	Dheeraj Mehta	Specialist I, global finance

- a) **Responsibility of internal monitoring group:**

- ❖ The monitoring group will be responsible for on-ground assessment of the project(s), coordination with the NGOs and stakeholders.
- ❖ The monitoring group will be responsible for timely execution and monitoring of the projects.
- ❖ The monitoring group will plan annual budgets for CSR projects in coordination with the NGOs and make a proposal to the CSR committee.
- ❖ The monitoring group will report to the CSR committee the progress on CSR projects and status of CSR expenditure once in each quarter.
- ❖ The monitoring group will be responsible for documentation and reporting of all CSR activities of the Company in pursuit of the Companies Act and the CSR rules.

10.0 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 baseline 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 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
2	CSR committee	Half yearly
3	Internal monitoring group	Quarterly

Budget monitoring:

The CSR committee shall establish an accounting system to ensure project-wise accounting of CSR spends.

Reporting framework:

The internal monitoring group shall monitor progress on CSR projects and CSR spend and report to the CSR committee quarterly.

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

Annexure - 1

S.N o.	Thematic area which the project covers	Amount outlay (budget) program wise	Implementation mechanism
1	Development of local communities		<p>A. ATKIPL CSR team shall provide the facilities/ amenities to the marginalized section of girls:</p> <ul style="list-style-type: none"> • Basic amenities, and counseling • Education and vocational training • Stage and street theatre training • A safe place with healthy environment and community <p style="text-align: center;"><i>(Engaging with IP Jamghat Foundation)</i></p> <p>B. CSR team works on women empowerment by improving access to menstrual health, livelihood opportunities, financial literacy, and digital learning for underserved communities. The organization engages women in producing reusable sanitary napkin kits, creating income opportunities while promoting sustainable menstrual practices. It also builds community leadership through local women leaders and provides financial and digital learning programs to help women make informed economic and health decisions. Through this integrated approach, Srujna aims to strengthen women's financial independence and overall well-being.</p> <p style="text-align: center;"><i>(Engaging with IP Srujna)</i></p>
2	Education and skill development		<p>A. ATKIPL CSR team shall work with IP toward the following education and skill development activities:</p> <ul style="list-style-type: none"> • Providing remedial education to approximately 200 children • Engaging in 'weekend activities' (telling stories to the children about the values and social skills) • Providing basic computer literacy to the children by providing computer courses and also giving additional exercises through computer workbooks <p style="text-align: center;"><i>(Engaging with IP Sahara Foundation)</i></p>

S.N o.	Thematic area which the project covers	Amount outlay (budget) program wise	Implementation mechanism
			<p>B. ATKIPL CSR team shall create a pool of young and independent people from the marginalized section for skill development. This shall be achieved through trainings to the urban underprivileged adolescent youth in English proficiency, basic computer education, and soft skills for enhancing their prospects of employment in the fast-expanding retail, hospitality, and BPO sectors</p> <p><i>(Engaging with IP SMILE Foundation & Samaj Vikas Sanstha)</i></p> <p>– ATKIPL CSR team shall develop growth strategy in the education sector to help keep children from poor families in school, reduce dropout rates, and generally improve the lives of the community. It aims to ensure that every child has access to good education and the opportunity to bloom into future leaders of the country, contributing to its development and self-reliance.</p> <p><i>(Engaging with IP Khushii Kinship for Humanitarian, Social and Holistic Intervention)</i></p>