



Synopsis:

The Corporate Social Responsibility Policy (“the CSR Policy”) of WNS Business Consulting Services Private Limited (“WNS BCS” or “the Company”) demonstrates the commitment of WNS BCS to operate its business in a manner which is sensitive and responsible towards the society and compliant with the relevant directives, regulations and Code of Business Ethics and Practice. The Policy strives to support the Government’s vision for Corporate Social Responsibility.

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Status : DEFINITIVE

Author : CSR COMMITTEE – **WNS Business Consulting Services Private Limited**

Authorized & Approved: BOARD OF DIRECTORS - **WNS Business Consulting Services Private Limited**



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1. Introduction

1.1. Objectives

WNS BCS framed its CSR Policy to establish its commitment to serve the community through its various programs.

CSR at WNS BCS is beyond merely charity and monetary donations. It plays an active role through employee engagement in volunteering activities and is an integral part of the corporate strategy. From need based activities to sustainable initiatives, WNS BCS CSR programs are focused on making a significant difference to society and to improve the overall quality of education for lesser privileged children by taking it beyond academics. The programs are based on a clearly defined social philosophy of helping the lesser privileged to help themselves using the tools provided by us.

1.2. Applicability

The Policy is applicable to WNS Business Consulting Services Private Limited and shall apply to all CSR initiatives and activities taken up by the Company.

1.3. CSR Activities

List of CSR activities or programs which WNS BCS plans to undertake generally and in pursuance to Schedule VII and applicable provisions of The Companies Act, 2013 are:

Primary CSR activity of WNS BCS shall be in relation to:

- (i) Promoting education, including special education and employment enhancing vocation skills and livelihood enhancement projects especially among children;
- (ii) Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare, sanitation and making available safe drinking water especially among children;
- (iii) Setting up homes, hostels, day care centers and such other facilities for children and orphans and adopting measures for reducing inequalities faced by socially and economically backward children.

WNS BCS may also engage in **Other** CSR activities in relation to:

- (iv) Promoting education, including special education and employment enhancing vocation skills and livelihood enhancement projects especially among women, elderly, and the differently-abled;
- (v) Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare, sanitation and making available safe drinking water especially among women, elderly, and the differently-abled;
- (vi) Promoting gender equality, empowering women, setting up homes and hostels for women; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (vii) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (viii) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining quality of soil, air and water;
- (ix) Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up of public libraries; promotion and development of traditional arts and handicrafts;
- (x) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (xi) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- (xii) Rural development projects;
- (xiii) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic

development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women; and

- (xiv) Such other activities as are permitted under the applicable provisions of The Companies Act, 2013

The following CSR activities or programs shall not be undertaken

- (i) Contribution of any amount directly or indirectly to any political party
- (ii) The CSR projects or programs or activities that benefits only the employees of the company and their families
- (iii) One-off events such as marathon, awards, charitable contribution, advertisement, sponsorships of TV programs etc.
- (iv) Expense incurred by companies for the fulfillment of any other Act/Statute regulations (such as Labor Laws, Land Acquisition Act, 2013, Apprentice Act, 1961 etc.
- (v) Activities undertaken by the company in pursuance of its normal course of business
- (vi) The project or program or activities undertaken outside India

1.4 CSR Budget

- (i) The Board of Directors of WNS Business Consulting Services Private Limited shall ensure that the Company spends, in every financial year at least two percent of the average net profits of the Company made during the three immediately preceding financial years on the CSR initiatives in accordance with the relevant provisions of The Companies Act, 2013 and Rules thereof (as amended from time to time) as applicable to the Company.
- (ii) Where the Company fails to spend such amount, it shall provide reasons for being unable to so, in the Board's Report to shareholders, in accordance with the relevant provisions of The Companies Act, 2013 and Rules thereof (as amended from time to time)

1.5 CSR Committee

The Board of Directors of WNS Business Consulting Private Limited has established a Committee of the Board as the Corporate Social Responsibility Committee. The Committee comprises of two Directors of the Board and its composition more than adequately meets the requirements of Companies Act,2013.

The CSR Committee shall carry out the functions as mandated by The Companies Act,2013 and the Rules thereof.



1.6 CSR Team

The CSR Team comprises of the personnel deputed on CSR activities

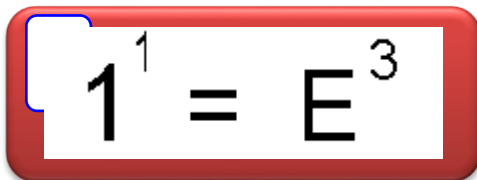
2. CSR Mission, & Equation at WNS BCS

2.1. Mission:

The mission of CSR initiatives in WNS BCS is to **Educate, Empower and Enrich** the under-privileged children / youth.

- **Educate** beyond academics
- **Empower** them to cross the bridge of social and economic divide
- **Enrich** with real-life skills
- Encourage employees / clients to give back to society

2.2. WNS BCS CSR Equation:

A red rounded rectangular box containing the equation $1^1 = E^3$. The number 1 has a small blue bracket above it.

The WNS BCS CSR equation means *“Each one of us has the power to positively impact a life through Education, Empowerment and Enrichment.”*



3. The Framework of our CSR Initiatives

WNS BCS CSR initiatives are designed on the following framework:

- Self-sustaining & flexible programs that can be replicated and expanded as per requirement.
- Reach out to underprivileged communities which require educational help.
- Get employee volunteers to implement programs.
- Evaluate success of each program and set the scope to strategy revision.
- Customize programs as per the requirement of the communities targeted.

CSR Strategy:

- **Learning Centers:** Designed to administer strategic programs for children and youth living in challenging social-economic background. The programs are determined keeping in mind the specific requirements of the children and youth as they progress through their school and college years.
- **Active Volunteering:** Employees are encouraged to take time out from their regular work schedule to help with the education and development of children. Every CSR initiative has employee volunteering at the heart of it.

4. WNS BCS CSR Project and Program

Our CSR program is designed to create the right impact at the right stage, to help a lesser privileged child pursue higher education or be employment-ready. The aim is not just to reach a large number of students through strategic programs, but to ensure that the programs take the child through critical stages of a student life.

Our CSR program, as outlined below, shall be conducted on a pan-India basis and not beyond the geographical limits of India



4.1 Table 1 Program and initiative have been classified under the following criteria:

Mission	Program	Implementation Methodology	Monitoring Process
Educate	<ul style="list-style-type: none"> Focus on science through Mini Science Centers 	<p>Customized implementation methodology adopted for specific programs broadly include:</p> <ul style="list-style-type: none"> Engaging with needy schools through partner Non-Governmental Organizations (NGOs) WNS BCS volunteers reach out to lesser privileged children in the WNS BCS adopted schools and administer the targeted program 	<ul style="list-style-type: none"> Half-yearly performance report by partner NGO on the modules covered to be submitted to the CSR Committee Periodic review by WNS BCS CSR core team and continued feedback from the recipient children group, teacher's group, and school authorities who were benefited by the CSR program

- The CSR Committee shall recommend to the Board of Directors of the Company the amount to be contributed towards the projects and programs related to CSR activities.
- If it is observed that any CSR activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board of Director of the Company, discontinue funding of the project at any time during the course of implementation and use such funds for any other CSR project.

- The CSR Committee shall obtain feedback from the beneficiaries of the CSR projects, programs and activities. If considered necessary, the effectiveness of the various programs and activity undertaken under the CSR may be evaluated through external agencies for providing the required feedback and inputs to formulate and improve the programs in future.
- All CSR activities and expenses made thereon will be subject to audit by the Company's auditors.
- Details of the CSR initiatives and implementation shall also be included in the Annual Report of the Company, as per the requirements and format specified under the Companies Act, 2013 and the Companies (Corporate Social Responsibility) Rules, 2014. Further, such details shall also be displayed on the website of the Company.

4.2 Execution / Implementation Strategy:

The WNS BCS CSR programs are predominantly driven through schools, which cater to less privileged children from challenging socio-economic backgrounds.

The key pillars to our implementation strategy are:

- **Employee Volunteers**

Our approach to driving CSR programs with the employee volunteers includes identification of programs, creation of modules, and coordination with volunteers for administering the program on the designated day and time.

- **Implementation Partners**

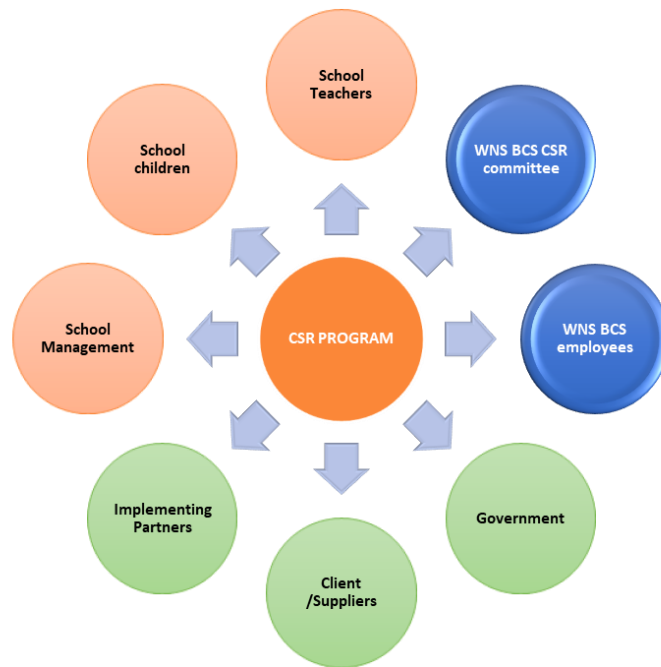
WNS BCS partners with Non-Governmental Organizations (NGOs) and institutions/schools to implement its strategic programs. The CSR Committee will select such implementation partners;

- (i) Having an established track record of at least three years in implementing of similar kind of activities.
- (ii) After proper due diligence on them to ascertain whether they possess the necessary and desired competence, management and financial capabilities, integrity and accountability to implement the CSR programs of the Company.



Our approach to implementing CSR programs with NGOs/ partners/institutions/schools includes identification of needy areas where intervention is required. This is followed with short listing and finalization of programs to achieve desired impact; and periodic monitoring of program outcomes.

• **Our Stakeholders**



• **Mode of Stakeholders Engagement**

SL No	Stakeholders	Engagement Topics	Engagement Frequency	Engagement Mode	Engagement done by
1	CSR Committee	<ul style="list-style-type: none"> ➤ CSR committee meeting (program/activity approval & budget approval) ➤ CSR program/activities & budget reviews 	As per The Companies Act,2013	- Meetings	-WNS BCS board - CSR Lead
2	WNS BCS Employees	<ul style="list-style-type: none"> ➤ Employee engagement activities 	Need based-	- Sharing CSR reports/activities via WCF website/pulse	- CSR team - Program Leaders



				newsletter & volunteer felicitation	
3	School/ Academia	<ul style="list-style-type: none"> ➤ Before implementation- Identification/On site interview/assessment with school authorities-teachers- decision makers about WNS BCS CSR activities ➤ During implementation- Timely review with school authorities / Teachers/ decision makers about CSR activities ➤ After completion- Feedback mechanism, impact assessment 	-Need based	<ul style="list-style-type: none"> - Site visit - Meetings - Feedback/ survey 	<ul style="list-style-type: none"> - CSR team - Implementing agency -WNS BCS volunteers - Program Leaders
4	NGOs/ Implementing partner	<ul style="list-style-type: none"> ➤ Before signing of MoU – Review the project proposal& budget and check eligibility ➤ Post review & during selection - Explain about WCF code of conduct/policies ➤ Create project design & baseline study ➤ During implementation- Timely project review, site visit and feedback 	<ul style="list-style-type: none"> - Project reports review - Site visit (Need Based) 	<ul style="list-style-type: none"> -Site visit -Meetings -Reports sharing 	<ul style="list-style-type: none"> -CSR team - Program Leaders -WNS BCS volunteers
5	Local Community	<ul style="list-style-type: none"> ➤ Consult local community leaders and brief WCF activities ➤ Baseline survey 	-Need based (program specific)	-Survey	<ul style="list-style-type: none"> -CSR team -WNS BCS volunteer -Program partners
6	Government	<ul style="list-style-type: none"> ➤ Meeting with education department ➤ Explain/brief project status (progress) time-to - time ➤ Baseline survey 	-Need Based	<ul style="list-style-type: none"> -Meetings -Survey 	<ul style="list-style-type: none"> -CSR committee - CSR Lead - Program Leaders CSR Team

4.3 Implementation Schedule

The programs undertaken by WNS BCS are broadly classified under three key criteria of Educate, Empower and Enrich. We execute a range of programs as per monthly calendar



schedule. This monthly calendar is created in conjunction with the schools and implementation partners. The program plans are developed based on the needs of the schools and general socio-economic conditions of the specific location.

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5. Policy Review

- This policy will be reviewed and altered from time to time, at least on an annual basis, in light of legislative changes or other prevailing circumstances.
- The CSR Committee is empowered to amend or modify this CSR Policy and such changes shall be placed before the Board of Director of the Company for approval.
- The CSR Committee shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this Policy.

6. Miscellaneous

- All administrative expenses, including expenditure on wages and salaries, tours and travels, and training and development of personnel deputed on CSR activities would be borne from CSR funds. However, the expenditure in a financial year for building CSR capacities of the personnel as well as the implementing agencies shall not exceed 5% of total CSR expenditure of the Company in such financial year.
- The surplus arising out of these CSR programs (if any) shall not form a part of business profit of the Company and will be re-invested in CSR programs.



7. Document Control

Title:	Corporate Social Responsibility Policy	
Identification:	WNS BCS 1	No of pages: 13
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Date	Version	Reasons for Amendment
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Associated documents:	None	