

eClerx/SECD/SE/2025/099

August 19, 2025

BSE Limited Corporate Relationship Department, Phiroze Jeejeebhoy Towers, 25 th Floor, Dalal Street, Fort, Mumbai - 400 001	National Stock Exchange of India Limited Exchange Plaza, Plot No. C/1, Block G, Bandra - Kurla Complex Bandra (East), Mumbai – 400 051
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Dear Sir/Madam,

Reg: Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Sub: Business Responsibility and Sustainability Report for the financial year ended March 31, 2025

**Scrip Code: BSE - 532927
NSE - ECLERX**

In terms of Regulation 34(2)(f) of the Listing Regulations, please find enclosed the Business Responsibility and Sustainability Report for the financial year ended March 31, 2025, which also forms part of the Annual Report for FY2025.

The report is also available on the website of the Company viz. www.eclerx.com.

This is for your information and record.

Thanking you,

Yours truly,
For **eClerx Services Limited**



Pratik Bhanushali
VP – Legal & Company Secretary
F8538

Encl: A/a

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

The Business Responsibility and Sustainability Report is presented as prescribed under Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

Sr. No.	Particulars	
1.	Corporate Identity Number (CIN) of the Listed Entity	L72200MH2000PLC125319
2.	Name of the Listed Entity	eClerx Services Limited
3.	Year of incorporation	2000
4.	Registered office address	Sonawala Building, 1 st Floor, 29 Bank Street, Fort, Mumbai – 400 023, Maharashtra, India
5.	Corporate address	4 th Floor, Express Towers, Nariman Point, Mumbai – 400021
6.	Email id	investor@eClerx.com
7.	Telephone	+91 (022) 6614 8301
8.	Website	www.eClerx.com
9.	Financial year for which reporting is being done	Financial year 2024-25 (April 1, 2024 to March 31, 2025)
10.	Name of the Stock Exchange(s) where shares are listed	BSE Limited and National Stock Exchange (NSE) of India Limited
11.	Paid-up Capital	Rs. 47,65,03,590
12.	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Srinivasan Nadadhur Designation: Chief Financial Officer Telephone number: 91 (022) 6614 8301 E-mail id: esg@eclerx.com
13.	Reporting boundary	The reporting for this financial year is done for all our delivery centers located in India, which includes offices in Mumbai, Pune, Chandigarh, Mohali, Gurugram and Coimbatore until stated otherwise
14.	Name of the assurance provider	TÜV SÜD South Asia Private Limited
15.	Type of assurance obtained	Limited Assurance

II. Products/services

16. Details of business activities (accounting for 90% of the turnover)

Sr. No.	Description of main activity	Description of business activity	% of turnover of the entity
1.	Information Technology Enabled Services	eClerx offers business process management, change management, data-driven insights, and advanced analytics solutions to its clients.	100%

17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover)

Sr No	Product/Service	NIC Code	% of total turnover contributed
1.	Data processing, hosting and related activities; web portal	631	96.43%
2.	Software development, licensing of software products and related services	620	3.57%

The NIC codes are as per NIC-2008 code list. The percentages of turnover represent our global operations.

III. Operations

18. Number of locations where plants and/or operations/offices of the entity are situated

Location	Number of Plants	Number of Offices	Total
National	Not Applicable	9	9
International	Not Applicable	20	20

19. Markets served by the entity

a. Number of locations:

Location	Number of Plants
National (No. of states)	4 States and 1 Union Territory
International (No. of countries)	15

b. What is the contribution of exports as a percentage of the total turnover of the entity? 98.4%

c. A brief on types of customers

eClerx provides critical business operations services to over fifty global Fortune 2000 clients, including some of the world's leading companies across financial services, cable & telecom, retail, fashion, media & entertainment, manufacturing, travel & leisure, software and high-tech.

IV. Employees

20. Details as at the end of Financial Year: 2024-25 (March 31, 2025)

a. Employees (including differently abled)

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Employees						
1.	Permanent (D)	12,221	7,801	64%	4,420	36%
2.	Other than permanent (E)	4,407	2,659	60%	1,748	40%
3.	Total Employees (D+E)	16,628	10,460	63%	6,168	37%

Notes:

- eClerx designates everyone in its workforce as 'employees', so data specific to workers does not apply
- The employee count shown in the table above represents all offices located in India including subsidiaries

b. Differently abled Employees

Sr. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
Differently abled Employees						
1.	Permanent (D)	12	9	75%	3	25%
2.	Other than Permanent (E)	1	1	100%	0	0%
3.	Total differently abled employees (D+E)	13	10	77%	3	23%

Notes:

- eClerx designates everyone in its workforce as 'employees', so data specific to workers does not apply.
- This data pertains only to eClerx locations and subsidiaries in India, as global regulations prohibit employers from collecting personal disability information.

21. Participation/Inclusion/Representation of women

Sr. No.	Particulars	Total (A)	No and % of females	
			No. (B)	% (B/A)
1.	Board of Directors	9	1	11.11%
2.	Key Management Personnel	4	0	0%

Notes:

- Mr. PD Mundhra, Executive Director, and Mr. Kapil Jain, MD & Group CEO, are both members of the Board and are also considered Key Managerial Personnel. As such, they are included in both categories.

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	36.30%	41.70%	38.20%	44.73%	47.98%	45.88%	33.98%	35.56%	34.77%

Notes:

- eClerx designates everyone in its workforce as 'employees', so data specific to workers does not apply.
- Data for FY 2022-23 represents voluntary employee turnover pertaining to our offices in Mumbai, Pune and Chandigarh only. For FY 2023-24 and FY 2024-25 coverage has been extended to include both voluntary and involuntary turnover for our employees at all India locations.

V. Holding, Subsidiary and Associate Companies (including joint ventures)

23. (a) Names of holding/subsidiary/associate companies/joint ventures

Sr. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/Subsidiary/Associate/Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	eClerx LLC (U.S.A)	Subsidiary	100	No
2	eClerx Private Ltd (Singapore)	Subsidiary	100	No
3	eClerx Investments (UK) Limited	Subsidiary	100	No
4	Eclipse Global Holdings LLC	Subsidiary	100	No
5	CLX Europe Media Solution GmbH	Subsidiary	100	No
6	CLX Europe S.P.A (Italy)	Subsidiary	100	No
7	eClerx Canada Limited	Subsidiary	100	No
8	eClerx B.V. (Netherlands)	Subsidiary	100	No
9	ASEC Group LLC	Subsidiary	100	No
10	CLX Thai Co. Limited (Thailand)	Associate	49	No
11	CLX Europe Media Solution Limited (UK)	Subsidiary	100	No
12	eClerx Philippines Inc.	Subsidiary	100	No
13	eClerx PTY Limited	Subsidiary	100	No
14	Personiv Contact Centers India Private Ltd.	Subsidiary	100	Yes
15	AG Resources (India) Private Limited	Subsidiary	100	Yes
16	Eclipse Global Holdings LLC	Subsidiary	100	No
17	eClerx ME Information Technology Consultants L.L.C	Subsidiary	100	No
18	eClerx Switzerland SA	Subsidiary	100	No
19	Personiv Contact Centers LLC	Subsidiary	100	No
20	eClerx Peru SAC	Subsidiary	100	No
21	eClerx Egypt	Subsidiary	100	No

VI. CSR Details

- 24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013:** Yes
- (ii) Turnover (in Rs.):** INR 24,84,36,28,271 (including all Indian entities)
- (iii) Net worth (in Rs.):** INR 15,26,33,42,240 (including all Indian entities)

VII. Transparency and Disclosures Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGRBC).

Stakeholder group from whom complaint is received	Grievance Redressed Mechanism in Place (Yes/No) <small>(If Yes, then provide web-link for grievance redress policy)*</small>	FY 2024-25			FY 2023-24		
		Number of complaint filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaint filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes	0	0	-	0	0	-
Investors (other than shareholders)	Yes	0	0	-	0	0	-
Shareholders	Yes	39	0	Non-receipt of dividend and buy-back offer letter	29	1	Non-receipt of dividend & proceeds w.r.t. Bonus Issue
Employees and workers	Yes	6	2	Sexual Harassment complaints	1	1	Health and safety, working conditions
Customers	Yes	0	0	-	0	0	-
Value Chain Partners	Yes	0	0	-	0	0	-
Others	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

Notes:

- eClerx's Grievance Redressal mechanism is available on the company's intranet and can be accessed by all employees. In case of grievances, stakeholders can write to grievance@eclerx.com which is mentioned in the company's HR policy.

26. Overview of the entity's material responsible business conduct issues.

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Data Privacy & Cyber Security	Risk & Opportunity	<p>Risk</p> <ul style="list-style-type: none"> eClerx is an information technology enabled services company. It deals with large amounts of customer's financial data and Personal Identifiable Information (PII). Any kind of loss/theft of sensitive data through cyberattacks may lead to operational disruption, reputational damage, legal penalties, and customer churn. 	<ul style="list-style-type: none"> eClerx is an ISO27001:2022 certified company and is compliant with all the requirements of the standard. The company has a well-established IS policy which is governed by the dedicated Information Security Management Team (ISMT). eClerx has invested in firewalls, encryption, intrusion detection/prevention systems (IDS/IPS), multi-factor authentication (MFA) and endpoint protection 	<p>Negative</p> <ul style="list-style-type: none"> Cyber-attacks may lead to financial losses in terms of fines/penalties, legal costs, downtime costs, SLA penalties and revenue loss due to customer churn Building a robust IT infrastructure requires significant investment in terms of system installations, hiring and training employees and regular audits.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
			<p>Opportunity</p> <ul style="list-style-type: none"> eClerx serves over fifty global Fortune 2000 clients. Prioritizing data privacy and cybersecurity helps the Company gain customer trust and competitive advantage. Complying with regulations like GDPR, CCPA, or DPDP Act opens access to regulated markets creating additional revenue opportunities. 	<ul style="list-style-type: none"> All employees are mandatorily required to go through a biannual training on Information security, phishing, safe data practices, and incident reporting eClerx also undergoes annual audits by designated 3rd parties to ensure all systems and control procedures are in place 	<p>Positive</p> <ul style="list-style-type: none"> Increased customer confidence leading to retention and additional business Entry in to regulated markets by building capability to serve privacy-conscious customers, Fewer incidents leads to lower insurance premiums.
2	Corporate Governance and Business Ethics	Risk and Opportunity	<p>Risk</p> <ul style="list-style-type: none"> Unethical behavior (e.g., fraud, corruption, greenwashing) may lead to public backlash, regulatory action, or boycott. Poor governance may result in violations of corporate laws, insider trading rules, anti-bribery regulations, fines, sanctions, or even delisting from the exchanges <p>Opportunity</p> <ul style="list-style-type: none"> Strong governance attracts ESG-focused investors and leads to better stock performance over the long term. Transparent, ethical practices build stakeholder loyalty, culture of accountability, risk control, and long-term value creation. 	<ul style="list-style-type: none"> eClerx has a strong governance framework with clear roles and responsibilities for the Board of Directors, management, and stakeholders The company has set-up committees (audit, risk management, remuneration, ESG & CSR, and stakeholder relationship) for checks and balances eClerx has created a code of conduct covering conflicts of interest, bribery, discrimination, whistleblower protection, etc. which it enforces and ensures that it is accessible and understandable across all employee levels Conducts regular training on business ethics, anti-bribery, harassment, insider trading, etc. for all employees. Conducts regular internal and external audits 	<p>Negative</p> <ul style="list-style-type: none"> Poor corporate governance and unethical behavior may lead to regulatory penalties which may run into millions or billions. Various legal costs (lawsuits, class-action suits, settlements), loss of investor confidence, credit downgrades and reputational damage <p>Positive</p> <ul style="list-style-type: none"> Ethical, transparent companies often enjoy lower cost of capital and access to newer markets Reduced frauds improve efficiency, employee productivity and ensured shareholder value creation
3	Human Capital Development	Risk & Opportunity	<p>Risk</p> <ul style="list-style-type: none"> The loss of key people would have significant impacts on organizational and financial development as well as on maturity. The high attrition rates significantly raise the organization's costs. The key determinants of turnover in the industry are underemployment, personal dissatisfaction, organizational support, employee perception, and organizational culture. <p>Opportunity</p> <ul style="list-style-type: none"> A skilled and motivated workforce drives operational efficiency and innovation. Continuous upskilling and internal mobility reduces turnover, improves morale and attracts high-performing talent 	<ul style="list-style-type: none"> eClerx gathers employee feedback to assess satisfaction and identify areas for improvement. Addresses concerns to enhance employee engagement and productivity. Trains employees in AI, Generative AI (GenAI), and other emerging technologies. Equips staff with the skills to deploy these technologies in customer projects. Ensures eClerx remains competitive and future-ready in the evolving tech landscape. 	<p>Negative</p> <ul style="list-style-type: none"> Attrition costs including recruitment and onboarding may negatively impact the bottom line Unfilled roles or poorly trained staff reduce operational output hampering long term profitability and growth <p>Positive</p> <ul style="list-style-type: none"> Skilled, engaged employees deliver higher output and innovation Retention saves replacement and productivity ramp-up costs

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Climate Change & GHG Emissions	Risk & Opportunity	<p>Risk</p> <ul style="list-style-type: none"> • Climatic hazards have the ability to inflict physical damage to offices, data centers, cloud services infrastructure, and the electricity grid, which may disrupt operations at eClerx • Disruptions to a city's functional infrastructure, such as transportation systems, can severely impact daily operations. These disruptions may involve road closures, public transport breakdowns, or gridlock caused by natural disasters, extreme weather, or infrastructure failure, leading to delays, safety risks. • Extreme events like heatwaves, floods, or snowstorms can severely impact employees' health and commute. Health risks include heat-related illnesses, respiratory issues from poor air quality, and mental stress from disasters. • Transitional risks resulting from shifts in climate-related policies, local or national regulations, emission standards, net-zero initiatives, or increased use of renewable energy may demand significant investments or lead to penalties for non-compliance. <p>Opportunity</p> <ul style="list-style-type: none"> • Positioning itself as an environment friendly organization helps eClerx in improving the brand image • Savings from low carbon fuel transport, low emission/ renewable energy sources, green buildings reduces OPEX 	<ul style="list-style-type: none"> • eClerx has a dedicated Business Continuity Management (BCM) Policy and is an ISO22301 certified company for BCMS. • Climate action and net zero transition plan is integrated with the business strategy • eClerx has reinforce data centres and office buildings to withstand extreme weather. Uses backup power systems and improved cooling technologies. • Established an emergency preparedness plan for disasters such as earthquakes, floods, cyclones, etc. • Developed remote work capabilities and flexible work arrangements to minimize dependence on physical infrastructure. Expanding remote operations can enhance productivity during times of disruption and increase employee satisfaction by providing more flexible working options. • Preparedness to mitigate or withstand transition risks involves proactive strategies to adapt to changing climate policies, regulations, and energy standards. eClerx has implemented sustainable practices, invested in low-carbon technologies, and adopted renewable energy sources to reduce dependency on fossil fuels. 	<p>Negative</p> <ul style="list-style-type: none"> • Investments in renewable energy and low carbon fueled transportation services for our employees are significant which may result in increased costs and reduced profitability • Floods, fire damages, droughts and extreme weather events may cause shut-downs, repair costs, operational disruption and reduced productivity • Poor employee health due to environmental damage may hamper long term growth and profitability <p>Positive</p> <ul style="list-style-type: none"> • Positioning eClerx as a climate resilient company opens a plethora of new business opportunities both from existing and new clients. • Savings from lower energy bills increases profit and leads to a higher valuation
5	Customer Centricity	Opportunity	<ul style="list-style-type: none"> • A customer centric approach increases loyalty & retention. Personalized, responsive service builds long-term client relationships. • Satisfied clients lead to upselling, cross-selling, and positive referrals thereby aiding revenue growth • Provides a competitive advantage 	<p>Not considered a risk. However poor customer centricity can pose a threat to business sustainability. eClerx follows a strong governance approach towards maintaining customer delight. It has a stakeholder relationship committee at the board level to oversee client relations. Our business leaders are in constant touch with the clients to seek feedback which is then passed on to the delivery teams enabling them to provide best-in-class service delivery</p>	<p>Positive</p> <ul style="list-style-type: none"> • Increased client lifetime value through loyalty and repeat business • More revenue per client through deeper relationships • Referrals and positive word-of-mouth reduces marketing costs

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Sr. No.	Disclosure questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and Management Processes										
1.	a. Whether our entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Y	Y	Y	Y	Y	Y	N	Y	Y
	b. Has the policy been approved by the board? (Yes/No)	Y	Y	Y	Y	Y	Y	N.A.	Y	Y
	c. Web Link of the Policies, if available	https://eclerx.com/investor-relations/corporate-governance-policies/								
2.	Whether the entity has translated the policy into procedures. (Yes / No)	Y	Y	Y	Y	Y	Y	N.A.	Y	Y
3.	Do the enlisted policies extend to your value chain partners? (Yes/No)	Y	Y	Y	Y	Y	Y	N.A.	Y	Y
4.	Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<ul style="list-style-type: none"> eClerx has not obtained principle-wise certifications. It obtains certifications based on business needs & requirements Currently, eClerx is conforming to the requirements of, ISO 27001:2022 (Information Security Management System), ISO 22301:2019 (Business Continuity Management System) and ISO 42001:2023 (AI Management System) eClerx is also working on obtaining ISO 14001 (Environment Management System) and SA8000 (Social Accountability) in the current financial year 								
5.	Specific commitments, goals & targets set by the entity with defined timelines, if any.	eClerx's commitments, goals and targets form a part of its policies. Kindly refer to the policies on the link mentioned in 1 (C) above for the same								
6.	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	eClerx internally tracks the progress against the goals mentioned in the policies. The same is not disclosed publicly								

NA – Not Applicable

Governance, leadership and oversight

7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure):

This year, we have strengthened and advanced our Sustainability efforts, aligning them with our strategic vision for long-term growth, underpinned by a steadfast commitment to responsibility and innovation.

On the environmental front, while progress has been incremental, we remain committed to reduce our carbon footprint and enhance operational efficiency. We have diligently laid the foundation for our transition to clean energy.

Social impact remains at the core of our business, and this year we intensified our commitment to creating a fair, inclusive, diverse, and supportive work environment. Our employee engagement efforts have expanded, with a primary focus on mental health and well-being, as well as providing

greater access to development opportunities for all employees. Beyond our organization, our community initiatives have been impactful, with expanded outreach programs that focus on education, environment, healthcare, and sustainable livelihoods in the regions where we operate.

On the governance front, we have continued to raise standards in corporate transparency and accountability. Our governance practices are being continually refined to ensure that we meet the highest ethical standards, with a focus on risk management, compliance, and stakeholder engagement. Our Board of Directors plays a pivotal role in guiding our ESG strategy, providing oversight and ensuring that our initiatives yield tangible, positive outcomes.

While our achievements are substantial, we recognize that the pursuit of a sustainable future is an ongoing process. Through transparent reporting and collaboration with sustainability rating agencies like EcoVadis, CDP, S&P and Achilles, we constantly benchmark our performance against the industry and hold ourselves accountable to the highest

standards of ethical and environmental responsibility. Together with our stakeholders, we are creating enduring change, contributing to a world that is more

sustainable, equitable, and resilient. We are grateful for your continued trust and partnership as we build a brighter future.

8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy(ies).

Name: Srinivasan Nadadhur

Designation: Chief Financial Officer, eClerx Services Limited

Telephone number: +91 (022) 6614 8301

E-mail id: esg@eclerx.com

9. Does the entity have a specified Committee of the Board/Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

Yes, eClerx has a dedicated CSR & ESG Committee at the board level which is responsible for decision making on sustainability related issues. The committee comprises of the following members:

1	Mr. PD Mundhra	Chairperson (Executive Director)
2	Mr. Kapil Jain	Member (Managing Director & Group CEO)
3	Mr. Naresh Chand Gupta	Member (Non-executive Independent Director)
4	Mr. Naval Bir Kumar	Member (Non-executive Independent Director)
5	Mr. Shailesh Kekre	Member (Non-executive Independent Director)
6	Mr. Srinjay Sengupta	Member (Non-executive Independent Director)

The detailed information on the committee's roles and responsibilities is available at the following link (page 8): <https://eclerx.com/wp-content/uploads/2025/02/Committee-and-its-member-29012025.pdf>.

10. Details of Review of NGRBCs by the Company.

Subject for Review	Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee	Frequency: Annually (A) / Half yearly (H) / Quarterly(Q) / Any other – please specify								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow-up action	The performance against each policy is tracked internally by respective department heads. The same is centrally governed by the ESG committee.	A	A	A	A	A	A	NA	A	A
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	eClerx is compliant with all statutory requirements that are relevant to the principles. This is being reviewed by the internal ESG Committee.	Compliance status is updated on monthly basis by respective departments in the compliance tool and is centrally governed by the risk committee at eClerx.								

11. Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9
	N	N	N	N	N	N	N	N	N

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable

Essential Indicators

1. Percentage coverage by training and awareness programs on any of the Principles during the financial year.

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of Directors	4	eClerx Corporate Governance, Ethics, Code of Conduct, Insider Trading, Conflict of Interest, Nomination & Remuneration, Board Committees at eClerx, Risk Management and other company policies	100%
Key Managerial Personnel	12	Environmental sustainability, Data Privacy and Cyber Security, Information Security Management System, Career Development, Anti-bribery & Anti-corruption, eClerx Code of Conduct, Prevention of Sexual Harassment, Environment Health & Safety	100%
Employees other than BoD and KMPs	12		97.4%
Workers	Not Applicable	Not Applicable	Not Applicable

Notes:

- Under Regulation 25(7) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company provides various familiarization programs to ensure that independent directors understand their roles, rights, and responsibilities, as well as the company's industry, business model, and operations. These programs include targeted training sessions. The Company also regularly updates Independent Directors on recent developments, ongoing events, and significant regulatory changes.
- All eClerx employees must complete mandatory Code of Conduct training and acknowledge the Code upon joining the company. In addition, all employees are required to attend semi-annual refresher courses on information security.
- eClerx has recently implemented mandatory training modules on ESG, ethics, and health and safety, and Social Accountability for all employees, accessible through the company's learning portal.

2. Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year, in the following format (Notes: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website).

	NGRBC Principle	Name of the regulatory/enforcement agencies/ judicial institutions	Brief of the Case	Amount	Has an appeal been preferred? (Yes/No)
Monetary					
Penalty/Fine	No fines/penalties/punishment/award/compounding fees/settlement amount has been paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the current reporting year.				
Settlement					
Compounding fee					
Non-Monetary					
Imprisonment	Nil	Nil	Nil	Nil	NA
Punishment	Nil	Nil	Nil	Nil	NA

3. Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/enforcement agencies/ judicial institutions
Not Applicable	Not Applicable

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

Yes, eClerx has an Anti-Bribery and Anti-Corruption Policy that applies globally to all individuals associated with eClerx, including directors, senior executives, officers, employees (permanent, fixed-term, or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, and any other affiliates or subsidiaries.

eClerx is dedicated to preventing, and detecting fraud, bribery, and other corrupt practices. The company is committed to conducting all business activities with honesty, integrity, and the highest ethical standards, and enforces a strict policy against bribery and corruption in all its global operations. The full policy can be accessed at the following link: https://eclerx.com/wp-content/uploads/2024/11/eClerx-ABAC-Nov_2024.pdf.

5. Number of Directors/KMPs/employees against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/corruption.

	FY 2024-25	FY 2023-24
Directors	0	0
KMPs	0	0
Employees	0	0
Workers	Not Applicable	Not Applicable

6. Details of complaints with regard to conflict of interest.

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Directors	0	-	0	-
KMPs	0	-	0	-

7. Provide details of any corrective action taken or underway on issues related to fines/penalties/action taken by regulators/law enforcement agencies/judicial institutions, on cases of corruption and conflicts of interest.

Not Applicable since no cases of corruption or Conflict of Interest registered.

8. Number of days of accounts payables ((Accounts payable *365)/Cost of goods/services procured) in the following format.

	FY 2024-25	FY 2023-24
No. of days of accounts payables	62.03	61.27

Note: Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.

9. Open-ness of business: Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format.

Parameter	Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	0	0
	b. Number of trading houses where purchases are made from	0	0
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	0	0
Concentration of Sales	a. Sales to dealers/distributors as % of total sales	0	0
	b. Number of dealers/distributors to whom sales are made	0	0
	c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	0	0

Parameter	Metrics	FY 2024-25	FY 2023-24
Share of RPTs in	a. Purchases (Purchases with related parties/Total Purchases)	66.99%	68.71%
	b. Sales (Sales to related parties/Total Sales)	5.08%	7.50%
	c. Loans & advances (Loans & advances given to related parties/Total loans & advances)	0	0
	d. Investments (Investments in related parties/Total Investments made)	0	0

Note: Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.

Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year.

Total number of awareness programmes held	Topics/principles covered under the training and its impact	% of value chain partners covered (by value of business done with such partners) under awareness programmes
1 (Annual Training)	The training covers an understanding of eClerx's sustainable procurement policy. It includes topics such as environmental and social impact of procurement, ethics and integrity for suppliers, supplier diversity, supplier monitoring and governance, vendor evaluation practices and incentive programs	53%

Note: 75 critical vendors were identified in FY 2023-24 to whom the training invite was sent. Out of these 75 vendors, 51 vendors stayed critical in FY2025, rest became non-critical. These 51 vendors contributed to 53% of total spend in FY 2024-25. Training was conducted in FEB 2025.

2. Does the entity have processes in place to avoid/manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

Yes - eClerx Code of Conduct lays down the procedure to avoid/manage conflict of interests involving members of the Board and can be accessed at the following link on page 14:

https://eclerx.com/wp-content/uploads/2025/01/eClerx_Code_of_Conduct_-Jan_2025-Clean.pdf.

PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively:

	FY 2024-25	FY 2023-24	Details of improvements in environmental and social impacts
R&D	0	0	Not applicable
CAPEX	0	0	Not applicable

Note: eClerx operates in services, primarily digital operations, analytics, automation, and consulting, rather than manufacturing physical products. This means the scope to invest in environment-related process technologies (e.g., cleaner production, emissions control) is limited or non-material. Being an office-based company, eClerx has limited direct environmental impact (Scope 1 emissions). Most emissions come from indirect sources like electricity use (Scope 2) and supply chain (Scope 3). These are typically managed through energy efficiency, green office initiatives, or sustainable procurement, rather than R&D-heavy technologies. Most technology improvements are made through adoption or customization of existing platforms, not via capex-heavy innovation pipelines. These involve OPEX (operational expenditures) and policy/process improvement, not R&D or capex investments.

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Yes

b. If yes, what percentage of inputs were sourced sustainably?

60%

As a part of sustainable sourcing initiative, 53 of our vendors, accounting for 60% of total input (by value) have signed the compliance certificate with ESG clauses. Also, all critical vendors (determined by business value) are required to complete an ESG commitment questionnaire and acknowledge the Supplier Code of Conduct, which adheres to UNGC principles. As of FY 2024-25, a total of 1655 registered vendors existed in the system out of which 441 vendors signed the sustainable supplier code of conduct. Efforts are being made to strengthen the data capture and increase this share in future years. The Code now forms a part of the purchase order and is mandatory for vendors to acknowledge while accepting the purchase order. Also, starting September 2024, filling up the ESG questionnaire has been integrated with the vendor onboarding

process which makes it mandatory for all vendors to fill up the questionnaire prior to doing business with eClerx. Out of the 335 new vendors on-boarded last financial year, 161 have already filled the ESG questionnaire (48%).

3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

Not applicable. eClerx is a process management company specializing in IT-enabled services and does not produce tangible goods. As such, there is no involvement in reclamation. The wastes are handed over to designated vendors for recycling or disposal using sustainable means.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

No, EPR is not applicable to eClerx since it is not a manufacturing company and does not produce any goods.

Leadership Indicators

1. Has the entity conducted Life Cycle Perspective/ Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

eClerx, a provider of Business Process Management services, offers virtual products that have minimal environmental impact. Operating from leased facilities also limits its control over office product use. Therefore, lifecycle assessment is not a key focus area for the company due to its operational model.

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

None. There are no significant social or environmental concerns arising from the company's products since it is not a manufacturing organization. All the products are virtual in nature and life cycle assessment is not applicable.

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Not Applicable. eClerx is an IT enabled service provider and does not use any material to manufacture any products.

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tons) reused, recycled, and safely disposed, as per the following format.

Not Applicable. eClerx is an IT enabled service provider and does not manufacture any products. Hence, there are no reclaims.

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Not Applicable. eClerx is an IT enabled service provider and does not manufacture any products. Hence, there are no reclaims.

PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

1. a. Details of measures for the well-being of employees.

Category	% of employee covered by										
	Total (A)	Health Insurance		Accident Insurance		Maternity Benefits		Paternity Benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	7,801	7,801	100%	7,801	100%	N.A.	N.A.	7,801	100%	0	0%
Female	4,420	4,420	100%	4,420	100%	4,420	100%	N.A.	N.A.	0	0%
Total	12,221	12,221	100%	12,221	100%	4,420	36%	7,801	64%	0	0%
Other than permanent employees											
Male	2,659	2,659	100%	2,659	100%	N.A.	N.A.	2,659	100%	0	0%
Female	1,748	1,748	100%	1,748	100%	1,748	100%	N.A.	N.A.	0	0%
Total	4,407	4,407	100%	4,407	100%	1,748	40%	2,659	60%	0	0%

Notes:

- 100% of our employees in India are covered by Health and Accidental Insurance, and Parental benefits.
- eClerx offices are located on campuses which provides a common daycare facility and are available for employees to use at their discretion. These services are paid for by the employees.

b. Details of measures for the well-being of workers.

Not Applicable. Our entire workforce is categorized as “employees” and none as “workers”.

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format.

	FY 2024-25	FY 2023-24
Cost incurred on well - being measures as a % of total revenue of the company	0.33%	0.30%

Note: The data is specific to our locations in India.

2. Details of retirement benefits, for Current Financial Year and Previous Financial Year.

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	54%	N.A.	Yes	61%	N.A.	Yes
Gratuity	100%	N.A.	Yes	100%	N.A.	Yes
ESI	29%	N.A.	Yes	48%	N.A.	Yes
Others*	100%	N.A.	Yes	80%	N.A.	Yes

Notes:

- Data represents our permanent employees in India. Although 100% are covered under retirement benefits, however the above table denotes the percentage of employees who have opted for the particular benefit.
- Gratuity is applicable to all employees in India, provided they complete a tenure of 5 years.
- *Other benefits include Professional Tax and Labor Welfare Fund.
- Our entire workforce is categorized as “employees” and none as “workers”.

3. Accessibility of workplaces - Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Yes, all our office locations are fully accessible to persons with disabilities. We provide wheelchair ramps at the entrances, flap barriers in addition to turnstiles for easier entry, and disable-friendly restrooms on every floor. Lifts feature Braille buttons, engraved pathways, staircases, and hand railings to assist visually impaired individuals. Extra lift buttons for shorter individuals are available on all floors. Additionally, we offer home pick-up and drop-off services for persons with disabilities outside the transport boundary. More details can be found on page 9 of our Employee Relations & Human Rights Policy at the following link: https://eclerx.com/wp-content/uploads/2023/11/HR_CDP_006_Employee-Relations-and-Human-Rights-Policy.pdf.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

In line with the Disabilities Act, eClerx is committed to ensuring a work environment free from discrimination against persons with disabilities. We strive to create a supportive atmosphere where individuals with disabilities can excel in their roles. Our policies include:

- Providing necessary facilities and amenities to enable persons with disabilities to perform their duties effectively.
- Ensuring that all opportunities are based on merit.

We track disability self-declarations during both the application and appointment stages. eClerx has a dedicated equal employment opportunity policy available on the company intranet but not in the public domain. For other details relating to our commitment on human rights, please refer to page 9 of our Employee Relations & Human Rights Policy at the following link: https://eclerx.com/wp-content/uploads/2023/11/HR_CDP_006_Employee-Relations-and-Human-Rights-Policy.pdf.

5. Return to work and Retention rates of permanent employees that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	83%	Not Applicable	
Female	97%	61%		
Total	99%	72%		

Note: The data pertains to our permanent employees in India.

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

Permanent Workers	Not Applicable. eClerx categorizes its entire workforce as 'employees'
Other than Permanent Workers	Not Applicable. eClerx categorizes its entire workforce as 'employees'
Permanent Employees	Yes. eClerx's grievance redressal process occurs in four stages, beginning with the raising of the grievance. Employees are encouraged to promptly bring their grievances to the attention of their managers and/or HR Business Partner (HRBP), providing factual details and supporting evidence. This is followed by an investigation of the grievance, during which the HRBP ensures that all involved parties receive a fair hearing. In the third stage, known as the 'closure' stage, the HRBP receives the final recommendations from the investigating authorities (as outlined in the Conduct and Discipline Policy), communicates these recommendations to the immediate manager, and ensures they are implemented within one working day. The final stage, 'appeal,' allows employees who are dissatisfied with the decision to appeal to the vertical head or HR head within three working days of receiving the decision. If it is determined during the investigation that the grievance was fabricated with malicious intent, strict punitive action will be taken against the employee, as approved by both the Head of HR and the Vertical Head.
Other than Permanent Employees	Same as above

7. Membership of employees and worker in association(s) or Unions recognised by the listed entity.

In accordance with local laws and the constitution, and to ensure fairness in its labor practices, eClerx encourages open dialogue with employees to help improve its processes. eClerx acknowledges and respects employees' rights to form and join organizations for collective bargaining and other initiatives aimed at advancing their interests. No eClerx employee will be dismissed or otherwise discriminated against for being a member of such organizations,

nor for participating in them outside of working hours, or within working hours with the consent of their line manager. Employees are protected against discrimination due to their membership in employee organizations, and their employment is not contingent upon joining or relinquishing membership in such organizations. While these practices align with the Indian constitution, local laws and labor practices take precedence where applicable.

Category	FY 2024-25			FY 2023-24		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent employees	12,221	0	0%	11,648	0	0%
Male	7,801	0	0%	7,506	0	0%
Female	4,420	0	0%	4,142	0	0%

Notes:

- Headcount for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global headcount, whereas in the current year, reporting is restricted to India locations only.

8. Details of training given to employees and workers.

Category	FY 2024-25					FY 2023-24				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
	EMPLOYEES									
Male	10,460	9,793	94%	9,165	88%	9,401	8,390	89%	8,636	92%
Female	6,168	5,788	94%	5,358	87%	5,390	4,847	90%	5,030	93%
Total	16,628	15,581	94%	14,523	87%	14,791	13,237	89%	13,666	92%

Notes:

- Headcount for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global headcount, whereas in the current year, reporting is restricted to India locations only.
- Training data on health and safety for FY 2022-23 is not applicable, as the module was launched in FY 2023-24. However, all eClerx employees are required to complete mandatory training on the company Code of Conduct, which includes health and safety and working conditions.

9. Details of performance and career development reviews of employees

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	%(B/A)	Total (C)	No. (D)	%(D/C)
Male	10,460	8,638	83%	9,401	9,401	100%
Female	6,168	4,976	81%	5,390	5,390	100%
Total	16,628	13,614	82%	14,791	14,791	100%

Notes:

- Headcount for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global headcount, whereas in the current year, reporting is restricted to India locations only.
- 100% of our employees in India go through annual performance appraisal and career development reviews. However, data for FY 2024-25 shows only 82% because employees joining on or before 1st January 2025 are only eligible to be included in the appraisal cycle ending 31st march 2025. Rest are in probation and hence excluded from the annual appraisal cycle. They would be appraised in the upcoming cycle.

10. Health and safety management system.

a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

Yes, eClerx is committed to maintaining high standards of occupational health and safety while fostering environmental responsibility. We prioritize creating a safe and healthy work environment to prevent injuries, manage risks, and support employee well-being. In line with applicable health and safety regulations, we provide necessary training to our employees and protective equipment to our staff wherever required.

Preventive measures are central to our approach—we conduct regular risk assessments and engage in third-party audits to identify potential hazards and emergency scenarios. Our risk mitigation efforts include routine inspections such as fire alarm testing, mock drills, address system checks, smoke detector evaluations, fire extinguisher and sprinkler system maintenance, facility inspections for repairs or damage, ensuring clear fire exits, and health checks for electrical equipment.

b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

The company has an internal Environment, Health, and Safety Committee that conducts periodic assessments to identify hazardous and unsafe activities. This committee ensures the implementation of effective measures to control and mitigate potential risks. Additionally, process owners and managers are responsible for providing employees with a safe working environment. They must ensure that adequate controls are identified and implemented to address and mitigate occupational health and safety risks, such as fire, electric shock, slips, and trips.

c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N).

Yes, periodic meetings are held with various teams to gather their feedback on any identified work-related hazards. Employees can also raise concerns or requests through an online portal available on our global intranet. Frequent email communications are sent across the organization to provide updates on incident reports and share contact and escalation details for the respective points of contact. Fire exit plans are prominently displayed on all work floors, and unobstructed exit doors are provided for easy evacuation. Additionally, eClerx has implemented a system to appoint a senior manager in each team as a crisis warden, who is available to assist team members during times of crisis to ensure business continuity.

d. Do the employees/worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No).

Yes, eClerx operation centers are equipped with on-call doctor and paramedic services, including 24/7 emergency ambulance availability. Medical personnel are present at all office sites to handle emergencies. eClerx is also committed to promoting the overall mental and physical well-being of its employees. The eClerx Wellness team organizes virtual weekly Yoga, Meditation, and Zumba classes, facilitated by external experts, for employees and their family members at no cost. Additionally, eClerx conducts periodic health assessments and surveys to gauge employee wellness and offers annual health check-up plans for different age groups at subsidized rates. Employees also have access to an app and web-based portal for monitoring their mental and physical health.

11. Details of safety related incidents, in the following format

Safety Incident/Number	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	0	0
Total recordable work-related injuries	0	0
No. of fatalities	0	0
High consequence work-related injury or ill-health (excluding fatalities)	0	0

Note:

- The above data is for employees in India only.

12. Describe the measures taken by the entity to ensure a safe and healthy work place.

Fire safety drills, training, and awareness sessions are conducted for all employees at regular intervals. The BCM team performs call-tree tests to ensure that employees can be reached during a crisis. The company has implemented regular checks to mitigate risks, including fire alarm inspections, personnel addressal system tests, smoke detector evaluations, fire extinguisher inspections, sprinkler system checks, facility supervision to identify and address any damages or repairs that could cause accidents or injuries, ensuring obstacle-free fire exits, and health checks of all electrical equipment.

13. Number of Complaints on the following made by employees and workers.

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

Notes:

- Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.

14. Assessments for the year.

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100% of our offices in India are internally assessed for health and safety practices and working conditions.
Working Conditions	

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

No significant risks identified hence no corrective actions.

Leadership Indicators**1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N)?**

Yes, eClerx offers compensatory package to employees in the event of death.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

eClerx conducts periodic audits of its critical value chain partners to ensure compliance.

3. Provide the number of employees/workers having suffered high consequence work-related injury/ill-health/fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment.

	Total number of affected employees		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	0	0	0	0

There have been no instances of high consequence work-related injury/ill-health / fatalities in the mentioned period

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/No)

No, eClerx does not currently offer transition assistance programs to support continued employability for employees. However, the company provides ongoing learning and upskilling programs, along with ample career development opportunities, throughout employees' tenure. These resources can help employees manage their careers effectively after retirement or termination of employment.

5. Details on assessment of value chain partners.**% of value chain partners (by value of business done with such partners) that were assessed**

Health and safety practices	NIL
Working Conditions	NIL

The company plans to assess its critical value chain partners for health and safety practices in the coming years. As part of the vendor onboarding process, all critical vendors (based on business value) are required to complete an ESG commitment questionnaire and accept the Supplier Code of Conduct. These requirements are aligned with the NGRBC principles

and cover environmental, social, and governance topics.

6. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from assessments of health and safety practices and working conditions of value chain partners.

There are no corrective actions to report since the company has planned to initiate third party assessment of its critical value chain partners for health and safety practices and working conditions in the coming years. No major significant risks/concerns observed during internal periodic reviews.

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

The management team at eClerx engages with a variety of stakeholders through both formal and informal channels on a regular basis. Stakeholders are selected based on their material importance to the business after thorough consideration. The Stakeholder Relationship Committee oversees the overall stakeholder engagement process. Input from these stakeholders helps the company identify potential material topics and gain insights into future risks and opportunities for the business.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/Quarterly /others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	Project-related calls and meetings; project management reviews; relationship meetings and reviews; executive meetings and briefings; customer visits; responses to RFIs/RFPs; sponsored events; mailers; newsletters; brochures	Monthly, Quarterly, Half-yearly, Annually	Investments and capabilities in digital technologies; quality of work; data privacy and security; ethical behaviors; customer growth and transformation opportunities, fair business practices, community development
Employees	No	Town halls; roadshows; project or operations reviews; video conferences; audio conference calls; PEEP; PROPEL (employee forum); one-on-one counselling	Continuous	Safe and comfortable workplace; diversity; engaging assignments; learning opportunities; career development; compensation structure
Investors & Shareholders	No	Annual General Meeting; Annual Reporting; BRSR; Press releases; investor conferences; earnings calls	Monthly, Quarterly, Half-yearly, Annually	Financial performance; Materiality Assessment; Sustainability Reporting;
Academia	No	Meetings; presentations; lectures; webinars; website	Annually	Job creation; curriculum enhancement; internship opportunities
Recruiting firms; Vendors	No	Review meetings; RFPs/RFQs	As and when required	Talent acquisition; ethical behaviour; fair business practices; creditworthiness; business continuity
Partners and Collaborators	No	Meetings; site visits; conference calls; business review meetings; partner events	Monthly, Quarterly, Half-yearly, Annually	Customer feedback; automation opportunities; value addition and value creation; investments and credit-worthiness; expanding capabilities

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/Quarterly /others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Industry bodies	No	Conferences and seminars; working council meetings; surveys; summits	As and when required, Annual	Benchmarking; capabilities expansion, credit-worthiness; financial performance; ethics and fair business practices
Government bodies; NGOs; Local communities; Society	Yes, some local communities and NGOs	Project meetings, review calls; surveys; conferences; consultative sessions; due diligence; seminars; pre-releases	Monthly, Quarterly, Half-yearly, Annually	Social Responsibility, Understanding community needs, Sustainable development, Legacy building, Local economic development, etc.

Leadership Indicators

1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

eClerx holds periodic discussions between the Board committees and management to identify critical stakeholder concerns and align priorities with their expectations. The Stakeholders’ Relationship Committee of the Board provides guidance and oversees the mechanism for addressing grievances and complaints from stakeholders and aligning Stakeholder priorities with the Company’s business strategy. The committee reviews associate, vendor, and customer satisfaction survey reports, and oversees the mechanism for addressing stakeholders’ grievances. The committee also reviews the Company’s environmental, health and safety obligations towards the stakeholders. The inputs received influence the creation of appropriate policies and practices that govern responsible business.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, inputs received from stakeholders are important building blocks that help the company shape its ESG policy. An inclusive approach through continual engagement with stakeholders helps prioritize the key material issues. There is constant communication between the stakeholders and the business leaders highlighting critical improvement areas, emerging risks and new opportunities for the organization.

In FY 2024-25, eClerx conducted its first comprehensive materiality assessment with the help of an external agency. A four step approach was taken for the assessment which involved identifying

the potential material topics based on peer reviews, benchmarking, sectoral scans and media reports. This was followed by stakeholder engagement via online surveys and in-person meetings to prioritize the material ESG topics. Results were calibrated by analyzing stakeholder responses synthesizing the collected data. Finally risk and opportunity evaluation was done in line with the identified material topics.

These final material topics based on the inputs and feedback received from our stakeholders are thus incorporated into eClerx’s ESG plan. The company’s emission reduction targets mentioned in the environmental policy are set taking the customer’s net-zero targets into consideration. eClerx has also consulted with different stakeholders and adopted newer technologies to help itself transition to a low carbon economy. Pulse polls and engagement surveys are conducted annually to understand the pain points of its most important stakeholders – its people. These inputs help the company design policies and procedures that drive employee satisfaction.

The company’s regular connect with governing and regulatory bodies helps ensure compliance and consensus oriented decision making. The company is committed towards transparent and timely resolution of issues so that it continues to do right by all its stakeholders.

3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/marginalized stakeholder groups.

Through its various CSR initiatives, eClerx engages with the vulnerable and marginalized sections of the local community. These are typically rural women, students from economically weaker sections, unemployed youth from under-represented communities, persons with disabilities and children with special needs. This is governed by the CSR policy

at eClerx which is available on the company's website. Any concerns by any of the beneficiaries can be directly raised to the CSR head through our channel partners or electronically. The issues are immediately

addressed by the concerned departments wherever applicable. No issues have been reported by any of the vulnerable/marginalized stakeholder groups in the reporting year.

PRINCIPLE 5: Businesses should respect and promote human rights

Essential Indicators

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format.

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees covered (B)	% (B / A)	Total (C)	No. of employees covered (D)	% (D / C)
Employees						
Permanent	12,221	6,511	53%	11,648	8,887	76%
Other than permanent	4,407	4,171	95%	3,143	2,783	89%
Total Employees	16,628	10,682	64%	14,791	11,670	79%

Notes:

- Headcount for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global headcount, whereas in the current year, reporting is restricted to India locations only.

2. Details of minimum wages paid to employees in the following format.

Category	Total (A)	FY 2024-25				Total (D)	FY 2023-24			
		Equal to Minimum wage		More than minimum wage			Equal to Minimum wage		More than minimum wage	
		No. (B)	%(B/A)	No. (C)	%(C/A)		No. (E)	%(E/D)	No. (F)	%(F/D)
Permanent	12,221	0	0%	12,221	100%	11,648	0	0%	11,648	100%
Male	7,801	0	0%	7,801	100%	7,506	0	0%	7,506	100%
Female	4,420	0	0%	4,420	100%	4,142	0	0%	4,142	100%
Other than permanent	4,407	0	0%	4,407	100%	3,143	0	0%	3,143	100%
Male	2,659	0	0%	2,659	100%	1,895	0	0%	1,895	100%
Female	1,748	0	0%	1,748	100%	1,248	0	0%	1,248	100%

Notes:

- Headcount for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global headcount, whereas in the current year, reporting is restricted to India locations only.
- 100% of our employees are paid as per the minimum wages defined by the state laws.

3. Details of remuneration/salary/wages, in the following format

a. Median remuneration/wages.

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	8	Rs. 35,00,000	1	Rs. 35,00,000
Key Managerial Personnel	4	Rs. 2,89,59,851	0	N.A.
Employees other than BoD & KMP	10,458	Rs. 4,07,112	6,168	Rs. 3,30,564
Workers	N.A.	N.A.	N.A.	N.A.

Note:

- The above table indicates median wages for employees other than BoDs/KMPs in India only

b. Gross wages paid to females as % of total wages paid by the entity, in the following format.

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	30%	28%

Note:

- Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.

4. Do you have a focal point (Individual/Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No).

Yes, eClerx has various committees responsible for addressing the human rights issues like the Anti-Sexual Harassment Committee, Environment Health and Safety (EHS) Committee, Stakeholder Relationship Committee, Risk Committee, etc. to address human rights issues.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

Reporting avenues suggestion boxes, telephone number, email and different feedback mechanisms have been provided for eClerx employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of the Company Code, policies or law including human rights violation. Representations made in the reporting avenues are reviewed and appropriate action is taken on substantiated violations. eClerx follows a four stage process for grievance redressal.

1. Raising the Grievance: If an employee has a grievance, it is encouraged to be brought to the attention of their immediate manager and/or HRBP, providing factual details and supporting evidence. The employee can raise the grievance either through a one-on-one meeting or by email from his/her official email ID. For any concerns regarding workplace harassment, discrimination, discriminations or violations of Transgender Persons (TP) act, HIV act, Disabilities act, or violations under Employee Relations and Human Rights policy, employees may write to grievance@eclerx.com. To report any issues related to Sexual Harassment at the Workplace, they are advised to refer to the 'Anti Sexual Harassment Policy' available on company intranet and file their complaint by contacting ashc@eclerx.com.

2. Grievance Investigation: It is the responsibility of the immediate manager to promptly inform the HR Business Partner (HRBP) about the concerns. The HRBP will then commence the investigation process, ensuring that all involved parties are given a fair hearing. The HR BP will gather supporting evidence by screening all documented evidences and by speaking to the witnesses, wherever applicable. After the preliminary investigation the findings will be shared with leadership. The Site / Vertical HR Leader and the Program Lead will action on the report – either by way of giving a decision or by asking for additional data points, depending on the findings of the case. The complainant will be informed of the same.

3. Closure of the Grievance and Implementation of the Recommendations: Once the final recommendations have been received by the HRBP from the investigating authorities, the recommendations need to be communicated by the HRBP and the immediate manager to the employee and implemented within one working day. The company has remediation procedure in place for identified cases of discrimination and/or harassment for the affected victims. The company may offer additional leaves, facilitate team reassignment, and provide counselling services support; as deemed appropriate.

4. Appeal against the decision: If an employee (the complainant or defendant) is dissatisfied with the final decision he / she can appeal the same to the Vertical Head and HR Head of eClerx within three working days of the decision being communicated to him / her as mentioned in stage 3 of this process. This appeal has to be made either through a one-on-one meeting or by email written from the official email ID. However, if the status quo is maintained on the decision, the same is considered final and binding on all stakeholders.

6. Number of Complaints on the following made by employees and workers.

	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	6	2	WIP	0	0	N.A.
Discrimination at workplace	0	0	N.A.	0	0	N.A.
Child Labor	0	0	N.A.	0	0	N.A.
Forced Labor/Involuntary Labor	0	0	N.A.	0	0	N.A.
Wages	0	0	N.A.	0	0	N.A.
Other human rights related issues	0	0	N.A.	0	0	N.A.

Notes:

- The data in the above table represents our offices in India.
- Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format.

	FY 2024-25	FY 2023-24
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	6	0
Complaints on POSH as a % of female employees/workers	0%	0%
Complaints on POSH upheld	3	0

Note:

– The data in the above table represents our India offices as POSH Act, 2013 is mandated by Indian law.

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

Concerns on discrimination and harassment are dealt with confidentially. eClerx does not tolerate any form of retaliation against anyone reporting good faith concerns. Anyone involved in targeting such a person raising such complaints will be subject to disciplinary action. Same can be referred-to in detail on our Whistle blower and Vigil Mechanism available at the following link: https://eclerx.com/wp-content/uploads/2024/11/eClerx-WB-Nov_2024.pdf. No such incidents reported in the FY 2024-25.

9. Do human rights requirements form part of your business agreements and contracts? (Yes/No).

Yes, social responsibility and supplier diversity serve as strategic business advantages and helps eClerx enhance its brand reputation and customer loyalty, reduce risks and compliance costs, and maintain quality and reliability. In the marketplace, this also helps improve innovation and competitiveness by providing access to new markets, products, and ideas, that helps to support local communities, enhance their economic development, and promote environmental sustainability.

eClerx integrates labor and human rights issues in the company's entire supply chain management alongside conventional procurement considerations. The Company prioritizes the suppliers who shares common goals with eClerx on upholding labor and human rights standard, such as providing the employees with healthy and safe working environment, fair working conditions, and observing zero tolerance to child and/or forced labor. eClerx also implements a supplier diversity program that applies to all suppliers globally. Diversified suppliers are identified and prioritized throughout the procurement process. There is no discrimination based upon race, faith, gender, sexual orientation, age, marital status, disability or political affiliations. Detailed policy can be viewed at the following link https://eclerx.com/wp-content/uploads/2023/11/eClerx_Sustainable-Procurement-Policy.pdf. eClerx also has a sustainable supplier code of conduct which is required to be signed by all suppliers during the on-boarding process. The same can be accessed at https://eclerx.com/wp-content/uploads/2018/01/SSCM-Supplier-Code-Of-Conduct-Policy_11-01-2022.pdf.

10. Assessments for the year.

% of your plants and offices that were assessed (by entity or statutory authorities or third parties)

Child Labor	100%
Forced/Involuntary Labor	100%
Sexual Harassment	100%
Discrimination at Workplace	100%
Wages	100%
Others – please specify	N.A.

100% of eClerx's offices in India are assessed for Child labor, Forced/labor, Discrimination and Wages. It is eClerx's policy not to hire any employees below 18 years of age. This is embedded in the Company's recruitment process. The Company ensures that the relevant documents are obtained, and background verification conducted by credible third parties. For other areas such as Forced labor, Discrimination at the workplace and Wages, employees can escalate through as per the whistleblower policy available at https://eclerx.com/wp-content/uploads/2024/11/eClerx-WB-Nov_2024.pdf in case of violation of the same. In case of sexual harassment, eClerx has an Anti-Sexual Harassment Committee in place to investigate the matter, and the POSH annual report is filed every year as per the statutory requirement. The same is also reported to the audit committee on a quarterly basis.

11. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 10 above.

No, major cases/concerns identified. Hence, no corrective actions are currently underway.

Leadership Indicators

1. Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.

No business processes have been modified, however, eClerx maintains a strong vigilance by regularly reviewing and updating its policies to promote a workplace that prioritizes respect and inclusivity. As part of its commitment to respecting human rights in the workplace, eClerx has in place a strong and centralized grievance redressal process to better address employee concerns related to dignity at work, equal opportunity, and non-discrimination.

2. Details of the scope and coverage of any Human rights due-diligence conducted.

eClerx has not conducted due-diligence on human rights issues yet. All eClerx offices in India undergo internal assessment on Child/Forced Labor, Involuntary labor, sexual harassment, discrimination and Wages by the health and safety committee and the anti-sexual harassment committee every year.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, 100% of eClerx's offices are accessible to differently abled employees and visitors. In accordance with the provisions of the Disabilities Act, it is the Company's policy to ensure that the work environment is free from any discrimination against persons with disabilities. Further, the Company has taken all actions to ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same. The Company has built systems and processes to ensure:

- That appropriate facilities and amenities are provided to persons with disabilities to enable them to effectively discharge their duties in the workplace; and
- That no opportunity is denied to persons with disabilities on the ground of disability.
- The Company monitors self-declaration of disability at the application as well as appointment stage.
- The Company has an Equal Employment Opportunity guideline document published and made available on the intranet that can be accessed by all its employees.

4. Details on assessment of value chain partners.

% of value chain partners (by value of business done with such partners) that were assessed

Child Labor	Nil
Forced/Involuntary Labor	Nil
Sexual Harassment	Nil
Discrimination at Workplace	Nil
Wages	Nil
Others – please specify	Nil

The Company has not conducted any assessment of its value chain partners yet. However, it plans to initiate third party assessments for its critical vendors in the coming years. As part of the company's vendor on-boarding process, all its critical vendors (by value of business) are required to respond to an ESG commitment questionnaire and their acceptance of the Supplier Code of Conduct, which is based on the UNGC principles, is mandatory.

5. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 4 above.

Not Applicable, as the company has not conducted assessment of value chain partners yet. As part of the company's vendor on-boarding process, all its critical vendors (by value of business) are required to respond to an ESG commitment questionnaire and accept the Supplier Code of Conduct, which is based on the UNGC principles.

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format.

Parameter	FY 2024-25	FY 2023-24
From Renewable Sources (in Mega joules)		
Total electricity consumption (A)	3,02,74,906	2,91,32,211
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
Total energy consumed from renewable sources (A+B+C)	3,02,74,906	2,91,32,211
From Non-Renewable Sources (in Mega joules)		
Total electricity consumption (D)	1,69,67,434	1,50,82,202
Total fuel consumption (E)	0	0
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	1,69,67,434	1,50,82,202
Total energy consumed (A+B+C+D+E+F)	4,72,42,340	4,42,14,413
Energy intensity per rupee of turnover (Total energy consumed/Revenue from operations)	0.0019 MJ/INR	0.0020 MJ/INR
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP)	0.0384 MJ/USD	0.0407 MJ/USD
Energy Intensity in terms of employee headcount	2,841 MJ/employee	2,989 MJ/employee

Notes:

- Independent assessment/evaluation/assurance has been carried out by TUV SUD South Asia Pvt. Ltd.
- Energy consumption data includes only India offices.
- Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.

- Revenue from operations at our India locations is considered for intensity calculation: ₹24,843.63 Million (FY 2024-25), ₹21,946.95 Million (FY 2023-24).
- PPP factor of 20.20 considered for adjustment
(source: <https://data.worldbank.org/indicator/PA.NUS.PPP?end=2024&start=1990&view=chart&year=2024>)

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

Not Applicable. Perform Achieve and Trade (PAT) scheme is a regulatory instrument to reduce specific energy consumption in energy intensive industries. As eClerx is an IT Service Company, none of the company's sites have been identified as designated consumers under the PAT Scheme of the Govt. of India.

3. Provide details of the following disclosures related to water, in the following format.

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kiloliters)		
(i) Surface water	0	0
(ii) Ground water	0	0
(iii) Third party water	86,722	47,325
(iv) Seawater/desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	86,722	47,325
Total volume of water consumption (in kiloliters)	86,722	47,325
Water intensity per rupee of turnover (Total water consumption/Revenue from operations)	3.49 KL/million INR	2.15 KL/million INR
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP)	70.52 KL/million USD	43.53 KL/million USD
Water intensity in terms of employee headcount	5.22 KL/employee	3.20 KL/employee

Notes:

- Independent assessment/evaluation/assurance has been carried out by TUV SUD South Asia Pvt. Ltd.
- Data is specific to our offices in India.
- Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.
- All eClerx offices are leased. 100% of water used by eClerx is obtained from either the landlords or the municipal corporations, hence has been considered third party water. All withdrawn water is consumed for drinking, horticulture, toilet flushing and other domestic purposes. Since we are a service company, none of our processes/products are water dependent.
- Revenue from operations at our India locations is considered for intensity calculation: ₹24,843.63 Million (FY 2024-25), ₹21,946.95 Million (FY 2023-24).
- PPP factor of 20.20 considered for adjustment.
(source: <https://data.worldbank.org/indicator/PA.NUS.PPP?end=2024&start=1990&view=chart&year=2024>)

4. Provide the following details related to water discharged.

Parameter	FY 2024-25	FY 2023-24
Water discharge by destination and level of treatment (in kiloliters)		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0

Parameter	FY 2024-25	FY 2023-24
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	83,357	45,291
- With treatment – please specify level of treatment	0	0
(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kiloliters)	83,357	45,291

Notes:

- The data is specific to India locations only
- Independent assessment/evaluation/assurance has been carried out by TUV SUD South Asia Pvt. Ltd.
- Wastewater generated is sent to a common water treatment plant managed and operated by the facility owner. The treated water is reused for horticulture, toilet flushing, and other domestic purposes.
- All facilities where eClerx leased office spaces are zero liquid discharge facilities, ensuring that no untreated water is released into neighboring areas, thus preventing any adverse impact on environment.

5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

Yes, all eClerx office spaces are located in facilities that operate as Zero Liquid Discharge (ZLD) systems, managed by the facility owner. The treated water is reused for landscaping and restroom flushing, reducing reliance on freshwater reserves. The company ensures that its leased office spaces are in facilities that implement efficient water management practices, including sewage treatment, rainwater harvesting, and conservation measures.

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format.

Parameter	Please specify unit	FY 2024-25	FY 2023-24
NOx	Not Applicable	Not Applicable	Not Applicable
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others – please specify			

eClerx is an IT enabled services company. All its offices are leased facilities; hence the emissions are clubbed under Scope 1, 2 and 3 emissions. It does not track any other pollutants as they are insignificant.

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format.

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions	tCO ₂ e	549	122
Total Scope 2 emissions	*tCO ₂	3,970	3,448
Total Scope 1 and Scope 2 emissions	tCO ₂ e	4519	3,570
Total Scope 1 & Scope 2 emission intensity per rupee of turnover (Total Scope 1 & Scope 2 GHG emissions / Revenue from operations)	tCO ₂ e / million INR	0.18	0.16
Total Scope 1 & Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 & Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	tCO ₂ e / million USD	3.67	3.28
Total Scope 1 & Scope 2 emission intensity in terms employee headcount	tCO ₂ e / employee	0.27	0.24

Notes:

- Independent assessment/evaluation/assurance has been carried out by TUV SUD South Asia Pvt. Ltd.
- The above table includes the emissions from our Indian operations only. Data for FY 2023-24 differs from the previous year's report because last year's report covered data for India and Manila locations, whereas in the current year, reporting is restricted to India locations only.
- Scope 1 emissions for eClerx includes the GHG emissions from refrigerant leakage from the AC systems owned and operated by eClerx and from fire extinguishers. eClerx has no company owned assets like DG set, vehicles etc.
- The Scope 2 emission in table above has been calculated based on emission factor provided by CEA (Central Electricity Authority of India).
- *For Scope 2, emission factors of 0.842 kg-CO₂/kWh and 0.823 kg-CO₂/kWh have been considered according to CEA version 20 and version 19 for FY 2024-25 and FY 2023-24 respectively for all India locations.
- Revenue from operations at our India locations is considered for intensity calculation: ₹24,843.63 Million (FY 2024-25), ₹21,946.95 Million (FY 2023-24).
- PPP factor of 20.20 considered for adjustment.
(source: <https://data.worldbank.org/indicator/PA.NUS.PPP?end=2024&start=1990&view=chart&year=2024>)

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

eClerx has undertaken several initiatives to reduce GHG emissions across its operations. Some of them are as following:

Scope 1 reduction efforts

- eClerx has minimal Scope 1 emissions, given its reliance on leased office spaces and outsourced employee transportation. Nevertheless, the company is committed to further reducing these emissions by transitioning to refrigerants with lower global warming potential (GWP). As part of this initiative, eClerx has replaced traditional air conditioning gases such as R22 with more environmentally friendly alternatives like R410A. This Hydrofluorocarbon (HFC) offers higher heat transfer efficiency, improved system performance, greater cooling capacity, and significantly lower GWP compared to R22, making it a more sustainable choice.

Scope 2 reduction efforts

- All office floors use energy-efficient LED lighting, with meeting rooms featuring motion-sensor controls. The technical facility management team ensures optimal ambient temperatures to reduce overall energy consumption.
- As of the fiscal year ending March 2025, 93% of eClerx's total office space in India is situated in LEED/IGBC certified buildings. The company has also established a global facility selection guideline to standardize

criteria for choosing new sites worldwide. This initiative reflects a holistic strategy for reducing greenhouse gas emissions and addressing climate change. eClerx remains committed to shifting to renewable electricity. While just 9% of electricity consumed across our India locations came from renewable sources in FY2019-20, this share has risen to 64% by the end of FY2024-25..

Scope 3 reduction efforts

- To help lower its Scope 3 emissions, eClerx is adopting electric vehicles for daily employee commutes and business-related intercity travel. eClerx uses a proprietary platform called 'Fleet Star' to roster employees and vehicles on specific routes with a remarkable accuracy percentage of 98%. The company also prioritizes booking direct or non-stop flights for both domestic and international trips whenever possible to reduce emissions linked to layovers. Employees are encouraged to hold virtual meetings, webinars, and training sessions to limit travel needs. Additionally, eClerx books accommodations close to event venues to cut down on secondary transportation. Over 96% of sourcing is domestic helping to reduce emissions from transporting input materials. We have also upgraded our travel portal through which employees can view their GHG footprint to better understand their environmental impact and plan their travel.

9. Provide details related to waste management by the entity, in the following format.

Parameter	FY 2024-25	FY 2023-24
Total Waste generated (in metric tons)		
Plastic waste (A)	2.49	0.68
E-waste (B)	17.20	4.20
Bio-medical waste (C)	1.67	0
Construction & demolition waste (D)	0	0
Battery waste (E)	4.54	7.35
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any (G)	0	0
Other Non-hazardous waste generated (H). Please specify, if any (Break-up by composition i.e. by materials relevant to the sector)	73.38	46.46
Total (A + B + C + D + E + F + G + H)	99.28	58.69

Parameter	FY 2024-25	FY 2023-24
Total Waste generated (in metric tons)		
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.0040 tons/million INR	0.0027 tons/million INR
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)	0.0807 tons/million USD	0.0540 tons/million USD
Waste intensity in terms of employee headcount	0.0059 tons/employee	0.0039 tons/employee

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)

(i) Recycled		
– Plastic	0.52	0.25
– Other non-hazardous waste (food)	41.87	45.33
(ii) Re-used		
– Plastic	0	0
(iii) Other recovery operations	0	0
Total	42.39	45.58

For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)

(i) Incineration	0	0
(ii) Landfilling	0	0
(iii) Other disposal operations		
– Plastic	1.97	0.42
– E-waste	17.20	4.20
– Bio-medical	1.67	0
– Construction & demolition	0	0
– Battery	4.54	7.35
– Other non-hazardous waste (paper, food)	31.51	1.14
Total	56.89	13.11

Notes:

- Independent assessment/evaluation/assurance has been carried out by TUV SUD South Asia Pvt. Ltd.
- Data for FY 2023-24 in the current report differs from the previous year's report because last year's report covered global data, whereas in the current year, reporting is restricted to India locations only.
- The rise in waste numbers for FY 2024-25 compared to FY 2023-24 reflects the increase in headcount across all our locations and opening of new offices at existing locations.
- All the waste generated is either sent to the landlords for disposal (plastic, bio-medical, construction and demolition, paper and food wastes) or to certified vendors/re-cyclers for re-cycling (e-waste and battery waste) hence have been considered under other methods of disposal.
- Since eClerx is a services company, it does not generate any radioactive or hazardous waste. Hence these categories are not applicable.
- Other non-hazardous wastes majorly include paper waste and organic/food waste from cafeteria.
- Revenue from operations at our India locations is considered for intensity calculation: ₹24,843.63 Million (FY 2024-25), ₹21,946.95 Million (FY 2023-24).
- PPP factor of 20.20 considered for adjustment.
(source: <https://data.worldbank.org/indicator/PA.NUS.PPP?end=2024&start=1990&view=chart&year=2024>)
- Employee headcount limited to India is considered for calculation of intensity in terms of employee headcount.

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

As an IT-enabled services and data analytics organization, eClerx does not manufacture physical

products, so the use of hazardous and toxic chemicals in manufacturing processes is not applicable. The waste generated from operations primarily includes e-waste, battery waste, biomedical waste, and other non-hazardous waste such as paper and food.

Recognizing that waste management is a global concern, eClerx is committed to promoting a

sustainable waste management system as part of its environmental responsibility. The company has implemented a comprehensive waste segregation program across all office locations, featuring designated bins for recyclables, organic waste, and general waste. Training sessions are held to educate employees and housekeeping staff about the importance of segregation at the source. Additionally, eClerx carefully tracks and maintains records of the waste generated at its offices.

E-waste, including personal computers (desktops and laptops), mobile phones, printers, cartridges, and batteries, is returned to the original vendors or authorized resellers, who provide certificates confirming the successful recycling and recovery of materials. Compliance with e-waste legislation is rigorously evaluated to ensure all requirements are met before disposal.

eClerx has also taken significant steps to enhance health and hygiene for its female employees by installing hygiene bins and vending machines for material procurement and safe disposal. These machines have been placed in all female restrooms at our facilities in Mumbai, Pune and Chandigarh and are being gradually expanded to other locations. The company has tied-up with organizations who provide eco-friendly disposal and recycling of sanitary pads. Under their menstrual hygiene management process, they take care of recycling used sanitary napkins, from collection to processing. Sanitary pads are collected from all locations and brought to a material recovery facility which, in 20 minutes, recovers close to 99 percent of the material at low cost, separating it into pulp and plastic. This pulp can be used across various industries such as paper, packaging etc. thereby saving quite a good amount of GHG emissions.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals/clearances are required, please specify details in the following format.

Not applicable, since eClerx does not have any operations in ecologically sensitive areas.

12 Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year.

Not applicable. The company has not conducted the Environmental Impact Assessment (EIA) of any of its projects in the current Financial Year. None of the projects undertaken by the company qualify for environmental impact assessment as per guidelines set by government of India.

13. Is the entity compliant with the applicable environmental law/regulations/guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format.

Yes, eClerx is fully compliant with applicable environmental law/regulations/guidelines applicable in India. No fine/penalty/action was initiated against the entity under any of the applicable environmental laws/regulation/guidelines.

Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kiloliters).

We plan to report this section in the years ahead.

2. Please provide details of total Scope 3 emissions & its intensity, in the following format.

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	tCO ₂ e	14173	9,408
Total Scope 3 emissions per rupee of turnover	tCO ₂ e/ million INR	0.42	0.32
Total Scope 3 emission intensity per employee	tCO ₂ e/ employee	0.73	0.54

Notes:

- Independent assessment/evaluation/assurance has been carried out by TUV SUD South Asia Pvt. Ltd.
- Scope 3 includes data for our global offices
- Consolidated revenue from operations is considered for intensity calculation: ₹33,658.65 Million (FY 2024-25) & ₹29,255.43 Million (FY 2023- 24). Global headcount has been considered for intensity per employee.
- The ambit of Scope 3 covers all the categories as per the details mentioned below:

- **Category 1: Purchased goods and services and Category 2: Capital goods.**
Emission: 4,042 MTCO₂e

Basis of calculation: Spend based method has been used to estimate the emissions from our purchased goods and services and capital goods. United States Environmentally-Extended Input-Output (USEEIO) emission factors published by United States Environmental Protection Agency (USEPA) have been considered for estimation. The same are available at: https://cfpub.epa.gov/si/si_public_record_report.cfm?Lab=CESER&dirEntryId=349324

- **Category 3: Fuel and electricity related emission.**

This is included in Scope 2 calculation above.

- **Category 4: Upstream transportation and distribution.**

Emissions are not reported separately to avoid double counting, as they are already included in the cradle-to-shelf emissions of purchased goods and services.

- **Category 5: Waste generated in operations.**

Emission: 0.73 MTCO₂e

Basis of calculation: Emissions from this category are relatively less since eClerx is a service organization and does not produce any physical goods. Major types of waste are e-wastes, battery wastes, plastic, paper and organic wastes. Waste-type-specific emission factors have been considered as per DEFRA 23 for estimation. The same is available at: <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2023>.

- **Category 6: Business travel.**

Emission: 1,954 MTCO₂e

Basis of calculation: Distance based method of estimation is used for all domestic and international air travels and surface travels originating from India. 'Travelution', an internal web portal provides an integrated solution for all travel needs for travels originating from India and captures the mode and distance. Additionally, data from claims made by employees post travel have been considered for estimation.

Spend based method is used for estimating emissions from travels for outside India offices.

Emission factors from ESEIO, ICAO and DEFRA are considered for estimation. <https://www.icao.int/environmental-protection/CarbonOffset/Pages/default.aspx>. The links for USEIO and DEFRA are mentioned above.

- **Category 7: Employee commute.**

Emission: 7,498 MTCO₂e

Basis of calculation: eClerx had carried out an extensive survey to gather data regarding employee commuting habits. The survey was conducted across the offices in India and Manila that covers more than 90% of our workforce. The survey covered various aspects such as mode of transport, fuel types of personal vehicles used, work from home requests, carpool, etc. The results from the survey are used for estimating emissions for self-travelling employees.

Additionally, eClerx has a centralized internal tool called "Fleetstar" to capture data of employees

using company provided transport. The data from "Fleetstar" is used to calculate the distance and mode of transport (car/bus) which was provided by the Transport team.

Further, distance-based methods have been used to estimate the emissions from employee commute using DEFRA and CEA emission factors.

- **Category 8: Upstream Leased Assets.**

Emission: 679 MTCO₂e

Basis of calculation: In the context of eClerx, this includes emissions from the leased office spaces outside India, since these are relatively smaller offices spaces with less than 10% of the overall headcount.

Electricity consumption for USA offices are estimated based on office area and climate zone wise per square foot consumption from US EPA commercial building consumption survey data. For France and Germany, electricity consumption taken from ODYSSEE-MURE database. For Bangkok office, OECD (2024): Clean Energy Finance and Investment Roadmap of Thailand report has been referred. (<https://www.eia.gov/consumption/commercial/data/2018/index.php?view=consumption>)

Asset specific method based on floor space area and lease contracts shared by on-site POCs has been used to estimate the emissions. DEFRA and US EPA emission factors have been considered.

- **Categories 9 to 15** are not applicable to eClerx since it is an IT enabled service organization and does not manufacture any physical products to be sold to consumers. Also, eClerx does not have any franchises nor has it invested in any company/asset that generates carbon emissions.

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not applicable, since eClerx does not have any operations in ecologically sensitive areas.

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions/effluent discharge/waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiatives undertaken	Environmental Impact Factors	Benefits
1	<p>Lighting Initiative: Energy efficient LED lights installed in office areas</p> <p>Automation to control light fixtures installed motion sensors inside washrooms, meeting and conference rooms, to control the LED lighting fixture (ON / OFF) to save the electricity by switching off the lights automatically when area is unoccupied.</p>	<ul style="list-style-type: none"> - Minimization of mining operations - Minimization of waste and hazardous by-products - Minimization of air pollution - Use of recyclable environment friendly materials for manufacturing - Reuse / refurbish the end of life products and their disposal to minimize environment impact - Energy efficient reducing overall energy consumption and cost throughout the product's life 	<ul style="list-style-type: none"> - 30 to 50% saving in Lighting electrical consumption & cost compared to conventional lights - Reduction in power consumption leads to reduction in GHG emission - Operational life is 6 yrs. compared to conventional lights having avg. operational life of 2-3 yrs. only - LED lights can be recycled without emitting hazardous pollutants into the atmosphere as compared to conventional bulbs which contain mercury - LED lights give off very little heat compared to standard lighting. This allows us to reduce costs by minimizing certain considerations such as air conditioning. - LED lights produce virtually zero UV emissions.
2	Energy Star-rated air-conditioners with environment friendly refrigerant gas installed in Data-centre and Hub Rooms	<ul style="list-style-type: none"> - Minimization of mining operations - Minimization of waste and hazardous by-products - Minimization of air pollution - Energy efficient to reduce overall energy consumption and cost throughout the product's life 	<ul style="list-style-type: none"> - 10 to 15% saving in electrical consumption & cost compared to conventional ACs. - ACs with environment friendly gas have been used resulting in less depletion of ozone gas in the atmosphere. - Operational life of energy efficient AC is 10-12 yrs. compared to conventional AC having operational life of 7-8 yrs.
3	Optimal temperature setting implemented for entire office air-conditioners	<ul style="list-style-type: none"> - Minimization of mining operations - Minimization of air pollution - Energy efficient to reduce overall energy consumption and cost throughout the product's life 	<ul style="list-style-type: none"> - 5 to 7% saving in HVAC consumption would be achieved - Leads to increase in operational life of air-conditioners
4	Energy efficient Modular UPS system installed	<ul style="list-style-type: none"> - Minimization of mining operations - Minimization of air pollution - Energy efficient to reduce overall energy consumption and cost throughout the products life 	<ul style="list-style-type: none"> - 4 to 5% saving in electrical consumption & cost compared to conventional UPS - Energy efficient UPS systems gives 96% to 99% power efficiency at all times due to advance power saving technology, as against a normal UPS system which generally give 80-85% efficiency. - Conventional UPS system take up more space due to the fact that they are typically extended horizontally on the floor however modular UPS typically increase vertically in the rack along with the batteries thereby using less floor space. - Operational life is 10-15 years compared to conventional UPS having average operational life of 10-12 years. - Less heat dissipation and noise level compared to conventional UPS

Sr. No	Initiatives undertaken	Environmental Impact Factors	Benefits
5	Energy efficient Modular UPS system installed Lithium-Ion Batteries installed for UPS system	<ul style="list-style-type: none"> - Minimization of mining operations - Minimization of waste and hazardous by products - Minimization of air pollution - Reuse / Refurbish the end of life products and their disposable to minimise environment impact. - Energy efficient to reduce overall energy consumption and cost throughout the products life. 	<ul style="list-style-type: none"> - 3 to 5% saving in electrical consumption & cost compared to conventional battery - Lithium-Ion batteries don't contain cadmium (a toxic heavy metal) and are better for environment - Operating temperature for LI batteries is 30 to 35 Deg C and SMF batteries is 25 Deg C. resulting to HVAC electricity consumption saving in maintaining room temperature - Size & weight of LI battery is less as compared to SMF type battery and hence it requires 50% less footprint as compared to SMF type battery - Design / operational life of LI battery is 10-12 years as compared to SMF type battery having design operational life of 3-4 years only
6	Cold Aisle containment installed inside the Data centres	<ul style="list-style-type: none"> - Minimization of mining operations. - Minimization of air pollution. - Energy efficient to reduce overall energy consumption and cost throughout the products life. 	<ul style="list-style-type: none"> - Uniform cooling would be achieved in the Data centers. - With changed DC PAC setpoint tentative 10 to 20 % savings in DC HVAC consumption would be achieved.
7	Auto Power factor correction (APFC) panels installed with latest controller for PF correction (lead & lag)	<ul style="list-style-type: none"> - Minimization of mining operations. - Minimization of waste and hazardous by-products. - Minimization of air pollution. - Energy efficient to reduce overall energy consumption and cost throughout the products life. 	<ul style="list-style-type: none"> - Tentative 5% saving in electrical consumption & cost would be achieved.
8.	Modifications in HVAC setup by implantation <ul style="list-style-type: none"> - Installation of UVGI (Ultraviolet Germicidal Irradiation) system in eClerx floor AHU's - Installation of PHI (Photo Hydro- Ionization) system in eClerx floor AHU's - Replacement of eClerx floor existing AHU's MERV 8 type filters with MERV 14 type filters 	<ul style="list-style-type: none"> - Minimization of air pollution. - Minimization of risks of Air borne disease. - Minimization of waste and hazardous by-products. 	<ul style="list-style-type: none"> - Improves Air Quality in work area. - Improves Employee Health. - Increase the employee productivity. - Reduce risks of Airborne diseases. - Improves HVAC system efficiency.
9.	Maximising the Sourcing Green (Renewable) Power for eClerx office areas.	<ul style="list-style-type: none"> - Minimization of mining operations - Minimization of waste and hazardous by-products - Minimization of air pollution - Minimize environment impact - Minimize Ozone gas depletion 	<ul style="list-style-type: none"> - Reduction in GHG emission. - Reduction of Global Warming Potential (GWP). - Reduce ozone gas depletion in the atmosphere

5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/web link.

Yes, eClerx has a well-defined business continuity and disaster management plan. The company is also ISO22301 certified for Business Continuity Management System (BCMS). The system is developed to protect the business; including its employees, clients and stakeholders, by minimizing the impact during any business disruption. BCMS documents and maintains Business Continuity Plan at the organization level which is called Corporate BCP.

The plan provides guidance on how the business can reduce the potential impact of an incident by being prepared to maintain services in the event of:

- Physical disaster in company buildings or technology infrastructure
- Disruption of public infrastructure such as transportation, or power systems
- Major technology downtimes or security breaches
- Any natural or man-made disaster
- Pandemic or contagious diseases in the city

The Objective of this document is:

- To be aware of possible situations/risks that could endanger business
- To identify measures to prevent damage and protect the business
- To ensure uninterrupted services to the clients
- In case of a disruption-
 - Limit the extent and impact of damages as much as possible
 - Ensure recovery of critical activities as per the agreed Recovery Time Objective (RTO)
 - To ensure accuracy, correctness and records of Business Continuity Plans/events

The Business Continuity Plan is available on the company's intranet and can be viewed by all the employees

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

eClerx is committed to maintaining sustainable sourcing practices, which are enforced through its Supplier Code of Conduct (SCoC). This involves comprehensive evaluations of both potential and current partners within the company's supply chain, focusing on environmental regulations, health and safety standards, working conditions, and adherence to recognized sustainability benchmarks. All new vendors and service providers must sign the SCoC as part of the initial onboarding process. Being in the service industry, eClerx does not foresee any significant adverse impact to the environment arising from its value chain.

7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

Nil. The company is yet to assess its value chain partners. As part of the vendor onboarding process, all critical vendors (based on business value) are required to complete an ESG questionnaire and accept the Supplier Code of Conduct, which is based on UNGC principles.

PRINCIPLE 7:

Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/associations:

2 (Two)

b. List the top 10 trade and industry chambers/associations (determined based on the total

members of such body) the entity is a member of/affiliated to:

Sr. No.	Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
1	National Association of Software and Service Companies (NASSCOM)	National
2	Export Promotion Council for EOUs & SEZs (EPCES)	National

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

No corrective actions to report as there were no issues related to anti-competitive conduct by eClerx.

Leadership Indicators

1. Details of public policy positions advocated by the entity.

Not applicable since eClerx does not advocate any public policy positions.

PRINCIPLE 8:

Businesses should promote inclusive growth and equitable development

Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Not applicable, as the entity operates in the service industry and therefore does not have project-affected people.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format.

eClerx has not undertaken any projects related to Rehabilitation and Resettlement. The company primarily works in the areas of education, empowerment and environmental stewardship thereby increasing the financial independence of the youth.

3. Describe the mechanisms to receive and redress grievances of the community.

eClerx adheres to a structured approach of grievance redressal by the communities. It captures the

data in its proposal shared by the implementing agencies. The respective implementing agencies are primarily responsible for managing and resolving community feedback and grievances at their operational level. Each agency has its mechanisms that suit their organizational structure and regional context. Throughout the year, these agencies handle grievances directly and take necessary actions as per their protocols.

During the quarterly and half-yearly reviews, they provide eClerx with updates on any significant concerns or feedback. If any issues require intervention, they inform the Company proactively. The process ensures effective communication and collaboration with eClerx's implementing agencies, aligning closely with the Company's commitment towards responsible CSR practices.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers.

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs/small producers	16%	15%
Directly sourced from within India	97%	95%

Note: Data for FY 2024-25 cover all India locations. However, for FY 2023-24 it included only Mumbai, Pune, Chandigarh and Mohali offices.

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent/on contract basis) in the following locations, as % of total wage cost

Location	FY 2024-25	FY 2023-24
Rural	0	0
Semi-urban	0	0
Urban	0	21%
Metropolitan	100%	79%

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

Note: In India, eClerx is located at Mumbai, Pune, Chandigarh, Mohali, Gurugram and Coimbatore. According to the GOI's <https://censusindia.gov.in/census.website/data/population-finder>, all the above mentioned cities have population more than 1,000,000 hence they are categorized as metropolitan as per RBI Classification System.

Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social

Impact Assessments (Reference: Question 1 of Essential Indicators above).

The company has not conducted a Social Impact Assessment of any of its projects in the FY 2024-25.

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies.

Sr. No.	State	Aspirational District	Amount spent (In INR)
1	Punjab	Firozpur	₹31,30,000/-
	Punjab	Moga	

3. a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups? (Yes/No)

Yes, eClerx has a sustainable sourcing policy that lays down the procurement procedure from various groups including MSMEs, marginalized/vulnerable groups.

b. From which marginalized /vulnerable groups do you procure?

The government of India categorizes industries as Micro, Small and Medium Enterprises (MSMEs). eClerx has always encouraged MSMEs by giving them preference and priority payments. Diversified suppliers are identified and prioritized throughout our procurement process. eClerx's supplier diversity program expands purchasing opportunities for businesses owned and operated by minorities, women, LGBTQIA+, veterans, and service-disabled veterans, and disabled persons. Purchasing opportunities are also expanded for our non-profit organizations that hire disabled persons as well, if possible.

c. What percentage of total procurement (by value) does it constitute?

In FY 2024-25, almost 16% of our input materials were sourced directly from MSMEs.

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge.

Not Applicable.

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Not Applicable. No IP related disputes in the reporting period.

6. Details of beneficiaries of CSR Projects

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginal groups
1	Lighthouse Communities Foundation Livelihood for urban disadvantaged youth (Age group: 18-35) in Mumbai and Pune (Maharashtra)	2,398	83%
2	Social Action for Manpower Creation (SAMPARC) Education Support : Schools, Hostels, Junior College, and Higher Education in Pune (Maharashtra)	1,850	100%
3	Social Action for Manpower Creation (SAMPARC) Livelihood and skill development interventions for tribal beneficiaries in Pune (Maharashtra)	1,856	65%
4	Reimagining Higher Education Foundation (Plaksha University) Scholarship support to academically meritorious students in Mohali (Punjab)	8	0%
5	Seva Sadan Society Educational support for underprivileged urban children in Mumbai (Maharashtra)	106	100%
6	Kaveri Vanita Sevashrama Educational support for children at shelter home in Bengaluru (Karnataka)	38	100%
7	Kaveri Vanita Sevashrama Improve communication skills and life skills for govt. school students in rural Bengaluru (Karnataka)	1,657	54%
8	Aatmaja Foundation Educational support to girls aged 15-22 from economically disadvantaged backgrounds in Pune (Maharashtra)	40	100%
9	Manzil Welfare Society Educational and Employability to children 8 to 25 in New Delhi	837	66%
10	Sankalptaru Foundation Supported farmers with ~3,300 native fruiting saplings to improve livelihood through agroforestry in Ganganagar & Hanumangarh (Rajasthan)	12	100%
11	Making The Difference Charitable Trust Provided sustainable menstrual hygiene kit with awareness session to government school girls	250	100%
12	Goonj Support provided for disaster relief and rehabilitation in Madhepura (Bihar)	500	100%
13	Goonj Women were provided livelihood in Chennai (Tamil Nadu)	24	100%
14	K.C. Mahindra Education Trust A/C Nanhi Kali Supported girl child education in Pune (Maharashtra)	166	100%
15	GreenSole Foundation Supported underprivileged children with upcycled educational kits (mat, bag & slippers) in Navi Mumbai & Palghar (Maharashtra)	3,945	100%
16	Adventures Beyond Barriers Foundation Conducted inclusive cycling, and running activities for PwDs to increasing sensitivity to diverse populations in Pune (Maharashtra)	149	100%
17	Open Eyes Foundation Manimajra Chandigarh Supported underprivileged children with educational kits in Chandigarh, Panchkula (Haryana) & Mohali (Punjab)	435	100%
18	Open Eyes Foundation Manimajra Chandigarh Supported underprivileged children with books by reaching 30 schools, 12 NGOs, and 31 communities through the Mobile Library in Chandigarh, Panchkula (Haryana) & Mohali (Punjab)	1,600	0%

Sr. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginal groups
19	Siruthuli Plantation activity of 1000 native variety saplings at Chettipalayam in Coimbatore (Tamil Nadu)	10,000	45%
20	Aravindam Social Development Supported underprivileged children with quality education and basic medical aids at Gurugram (Haryana)	300	100%
21	R N Malhotra & Anna R Malhotra Charitable Trust Provide academic to government school kids in English & Maths subject in Faridabad (Haryana)	306	100%
22	Mantra Social Services Support government school students in career guidance and provide hand holding for students appearing for competitive exams in 23 districts (Punjab)	38,368	100%
23	Making The Difference Charitable Trust Planted over 2,350 saplings from 55 native species using the Miyawaki method in Thane (Maharashtra)	NA	0%
24	Siruthuli Rejuvenated stream & Check Dam at Malumichampatti in Coimbatore (Tamil Nadu)	1,09,500	60%

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

Clients form an integral part of eClerx's 'EPIC' values. The company has a robust process to receive and respond to consumer complaints and feedback. Respective business owners connect with clients at regular intervals through business review meetings (monthly/quarterly). Progress updates are discussed along with challenges and roadblocks, if any. Customer complaints and feedback are sought during these meetings and by means of surveys. Some clients also share a customer satisfaction score every month which is tracked by the business owners

and is given utmost importance in order to ensure client satisfaction.

2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about.

	As a percentage to total turnover
Environmental & Social products relevant to the product	Not Applicable
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	Not Applicable

Since eClerx is a service company, it does not manufacture any products that carry information about the above-mentioned topics.

3. Number of consumer complaints in respect of the following.

	FY 2024-25		Remarks	FY 2023-24		Remarks
	Received during the year	Pending resolution at the end of the year		Received during the year	Pending resolution at the end of the year	
Data privacy	0	0	-	0	0	-
Advertising	0	0	-	0	0	-
Cyber-security	0	0	-	0	0	-
Delivery of essential Services	0	0	-	0	0	-
Restrictive Trade Practices	0	0	-	0	0	-
Unfair Trade Practices	0	0	-	0	0	-
Other	0	0	-	0	0	-

4. Details of instances of product recalls on account of safety issues.

	Number	Reasons for recall
Voluntary recalls	Not Applicable	Not Applicable
Forced recalls	Not Applicable	Not Applicable

eClerx is a service company and does not manufacture any products. Hence there are no recalls.

5. Does the entity have a framework/policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

eClerx is an IT enabled services company and hence data security plays the most important part in all our transactions. eClerx's cyber security policy aims to protect eClerx's technology infrastructure from threat activity and to protect information from being stolen, compromised or attacked. Adhering to the policy helps in safeguarding the company from human errors, hacker attacks and system malfunctions in turn saving on the financial & reputational damage that may occur and from jeopardizing eClerx and its client's reputation.

eClerx is an ISO 27001 certified company for Information Security Management System and is fully compliant with all the requirements as outlined by the standard.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty/action taken by regulatory authorities on safety of products/services.

No Incidents were reported during the period relating to advertising, delivery of essential services; cyber security and data privacy of customers; product recalls; penalty / action by the regulatory authority.

7. Provide the following information relating to data breaches:

A. Number of instances of data breaches – Nil

B. Percentage of data breaches involving personally identifiable information of customers – Nil

C. Impact, if any, of the data breaches – No impact, no instances reported

Leadership Indicators

1. Channels/platforms where information on products and services of the entity can be accessed (provide web link, if available)

www.eclerx.com.

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services

eClerx is a B2B organization. All our customers are corporates who interact with our business leaders on a regular basis in order to stay updated about our products and services. eClerx is not a manufacturing company and it does not sell any physical products.

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

eClerx has a well-documented Business Continuity Management plan and is also an ISO 22301 certified company for BCMS. All its customers are communicated about any disruptions/discontinuation as per the business continuity plan. The policy is available on the company's intranet for all employees.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief.

Not Applicable, since eClerx does not manufacture any products.

5. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Yes, eClerx carries out periodic surveys to gauge customer satisfaction. Also, the business leads have monthly/quarterly business review meetings with their respective clients to discuss the same.