INTRODUCTION

Gartner India Research & Advisory Services Private Limited (the “Company”) is committed to give back to the community in locations where it conducts business, including caring for the environment. The Company aims to minimise the impact of its business on the environment, have a positive effect on society and seeks to further these objectives through trusts, societies and companies who embrace these objectives. The Company aims to use natural resources responsibly, work with community projects and encourage and educate its employees in these goals. The Company will also continue to assess the environmental and ethical impact of the business and work towards formalising guidelines to reduce any undesirable effects. The Company shall carry out the above in line with its obligations under applicable law¹.

VISION STATEMENT & OBJECTIVE

The objective of the Corporate Social Responsibility (CSR) Policy is to ensure that the Company operates on a consistent and compliant basis and lays down guidelines to make CSR a key business process for sustainable development of the society by directly or indirectly taking up programs that benefit the communities in and around its work locations, and over a period of time which result in enhancing the quality of life and economic well-being in these locations.

ROLES AND RESPONSIBILITIES

1. The Company’s Board of Directors (‘Board’) is responsible for ensuring that expenditure of CSR funds on ‘CSR Activities’ is incurred in accordance with applicable laws¹. This responsibility includes approving the annual action plan (“CSR Plan”) recommended to the Board by the CSR Committee each year on or before 31st May, monitoring the implementation of the plan and reporting on the expenditure of CSR funds.

2. ‘CSR Committee’ shall be comprised of 2 or more directors of the Board and is responsible each year for formulating and recommending to the Board the CSR Plan that meets the goals of this Policy. The CSR Committee shall establish the CSR Operating Committee

¹ Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules.
('COC'), review each year the CSR Plan submitted by the COC, monitor the COC’s activities, impose on the COC the requirement to submit quarterly reports on the implementation of the CSR Plan for its review and comment.

3. ‘CSR Operating Committee’ (COC) shall comprise of three or more staff members of the Company appointed by the CSR Committee to carry out CSR Plan. The total number of members shall not exceed 15. The COC will fulfill its responsibilities in accordance with the COC Charter.

3. COMPLIANCE TIMELINE

   In the first quarter every financial year, the CSR Committee will place for the Board's approval, the CSR Plan delineating the ‘CSR Activities’ to be carried out during that financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.

   The COC shall prepare the quarterly implementation plan of the CSR Activities at the beginning of each quarter of every financial year and issue necessary directions from time to time to volunteers to ensure orderly and efficient execution of the CSR Activities in accordance with this Policy.

   The COC will provide, at the beginning of next quarter, a quarterly status update to the CSR Committee on the progress of implementation of the approved CSR Activities carried out during the prior quarter. It shall be the responsibility of the CSR Committee to review such reports and keep the Board apprised of the status of implementation of the same.

   At the end of every financial year, the CSR Committee will submit its report to the Board.

SELECTION OF ACTIVITIES

   The Board shall consider the following criteria when identifying and selecting the CSR Activities to be undertaken and funded by the Company:

   1. “Ongoing Projects” of at least 2 and no more than 3 years are to be preferred over ad-hoc, one-time activities.

   2. Activities from any of the following categories: promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
      (a) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
      (b) eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
      (c) disaster management, including relief, rehabilitation and reconstruction activities.
3. The following are not CSR Activities under applicable law:
   (a) activities taken up in pursuance of normal course of business;
   (b) any activity undertaken outside India;
   (c) any contribution (direct or indirect) to political party;
   (d) activities benefitting employees and contractors of the Company;
   (e) activities deriving marketing benefits for the Company; and
   (f) activities carried out to fulfill any other statutory obligation under any Indian laws.

CRITERIA FOR SELECTION OF ORGANIZATIONS

The COC shall identify and shortlist the most qualified organisations (‘Organisations’) to undertake the CSR Activities in fulfillment of the CSR Plan. To qualify, an Organisation must be registered with the Ministry of Corporate Affairs and have a Unique Registration Number with effect from FY 2021. The COC must verify the Organisation’s reliability and track record in carrying out CSR Activities before shortlisting that Organisation.

Thereafter, the COC will recommend the shortlist of Organizations to the CSR Committee, which shall select the Organisations to recommend to the Board for approval. Upon approval the Organization will receive a cash grant and pro bono support in accordance with the contract between the Company and that Organisation. Preference would be given for contracts which are two years (not exceeding 3 years), subject to annual review.

CSR EXPENDITURE

The Board is responsible for ensuring that CSR expenditure is incurred by the Company on CSR Activities undertaken in accordance with the CSR Plan and applicable law.

For any surplus arising from any CSR Activities, the Board must use such funds for CSR Activities only. Accordingly, any income arising from CSR Activities will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

The CFO or the person responsible for the financial management of the Company shall certify that the funds have been utilized for the purpose and in the manner as approved by the Board.

MONITORING AND REPORTING

The CSR Committee is responsible for monitoring the impact of CSR Activities and reporting to the Board through:

• Quarterly report submitted by the COC;
• Fund utilization/expense report/certificate (as per the contract) as submitted by each Organisation;
• Where possible, the COC organizes field visits by members of the COC along with volunteers, including at least once for every CSR Program in the financial year.
The CSR Committee will advise the COC of the dates of the Board meetings and will require the reports on the status of CSR Activities and spending to-date to be submitted by the COC no less than one (1) week prior to the Board meeting date.

**COC AND EMPLOYEE ENGAGEMENT**

The COC will be responsible for CSR Activities and internal engagement activities at the Company. As much as possible, volunteering will be an important component of all CSR initiatives. Volunteering will be encouraged for all CSR Activities of the Company as engaging employees in community investment programs is an opportunity to sensitize them and increase camaraderie and bonding among them.