



ESG Governance

2025-26



ESG governance structure

Coforge has established a structured and robust ESG governance framework to ensure effective oversight, accountability, and integration of sustainability considerations across the organisation. The framework:

- is designed to balance **strategic oversight**, **enterprise-level coordination**, and **operational execution**, supported by independent assurance and periodic performance reviews

- enables strong leadership ownership, clear role definition, and disciplined execution of ESG priorities aligned with regulatory expectations, stakeholder needs, and long-term business strategy.

Coforge has developed an **ESG charter** that outlines the guiding principles and governance drivers that underpin its approach to sustainability and responsible business conduct. It establishes accountability and responsibility in the governance structure, guide decision making, and ensures that ESG considerations are embedded within Coforge's corporate governance framework.

The charter is anchored in the following core pillars

Compliance



Robust legal and regulatory compliance mechanisms supported by internal controls, audits, and independent external assurance.

Risk and Crisis Management



Periodic identification and assessment of ESG related risks, development of mitigation plans, installation of controls, and defined crisis management processes.

Accountability



Clear separation of ownership and management, active Board involvement in strategy, and formal evaluation of governance effectiveness.

Transparency



Regular engagement with stakeholders, effective internal communication, and transparent disclosures across statutory and voluntary reporting platforms.

Responsibility and Fairness



Adherence to a comprehensive Code of Conduct, commitment to equitable treatment of stakeholders, and responsible decision-making across operations.

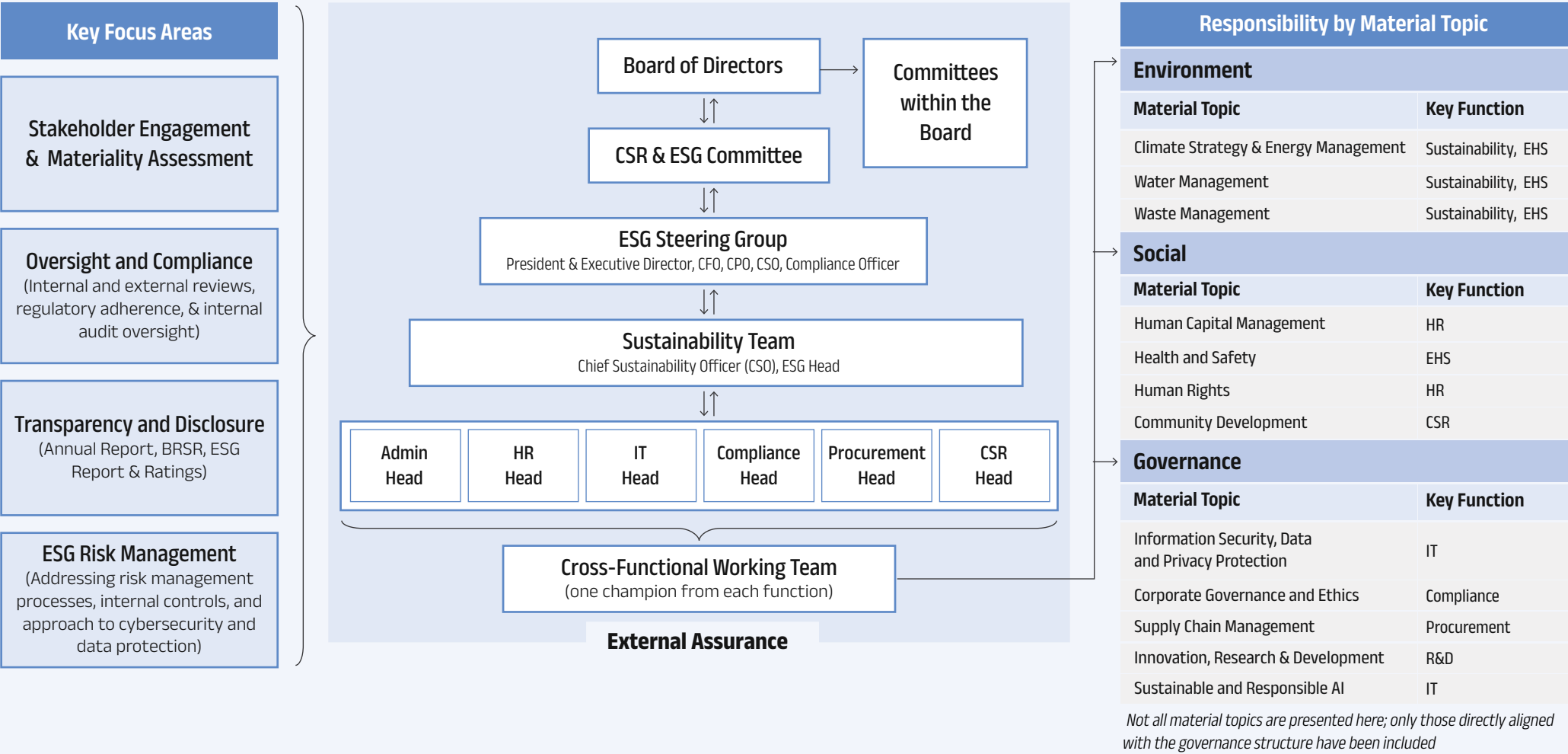
Social Inclusion



Promotion of diversity, equity, and inclusion, zero tolerance for discrimination, and initiatives that create long-term social value.

Our governance model

Coforge follows a multi-layered governance structure aligned with globally recognised “three-line” governance principles to manage ESG risks and opportunities effectively. This structure enables clear escalation, informed decision-making, and consistent implementation across the organisation.



Roles and responsibilities

1

Board of Directors (BoD)

The Board holds ultimate accountability for ESG governance and is responsible for:

- Providing strategic direction on ESG matters
- Approving ESG strategy, targets, policies, and public disclosures
- Reviewing ESG-related risks and opportunities
- Overseeing continuous improvement through internal audit and committee feedback

2

CSR & ESG committee (Board-level)

Supports the Board by focusing on ESG strategy, performance, risks, targets, and disclosures.

3

ESG steering group

The ESG Steering Group oversees enterprise-level execution and is responsible for:

- Reviewing and guiding ESG strategy and programmes
- Monitoring adoption of ESG policies and standards across the value chain
- Approving implementation of roadmaps and key initiatives
- Overseeing statutory and voluntary ESG disclosures
- Identifying emerging ESG risks, opportunities, and stakeholder expectations

4

Sustainability team

The Sustainability Team manages day-to-day ESG coordination by:

- Driving execution of ESG initiatives across functions
- Managing ESG data collection, validation, and reporting
- Ensuring alignment with regulatory and framework requirements
- Strengthening governance controls and internal capabilities

5

ESG leads and functional champions

Dedicated ESG leads and cross-functional champions are responsible for:

- Implementing ESG initiatives within their respective domains (Environment, Social, Governance)
- Setting and tracking function-specific targets and KPIs
- Ensuring compliance with applicable laws, policies, and standards
- Providing inputs for ESG reviews, disclosures, and assurance processes

6

External assurance

Independent external assurance providers:

- Validate ESG controls, data accuracy, and disclosures
- Identify gaps and improvement opportunities
- Strengthen transparency, credibility, and stakeholder confidence

Review and monitoring mechanism

ESG performance at Coforge is monitored through a structured review cadence:

- **Board-level reviews:** Conducted bi-annually and during key reporting cycles
- **ESG Steering Group reviews:** Conducted quarterly
- **Sustainability Team and Working Group reviews:** Conducted monthly or bi-monthly, as required

These reviews track progress against ESG targets, assess risks and gaps, and ensure timely corrective actions and informed decision-making.

Environmental and broader ESG matters are reviewed through a defined governance cadence, with formal oversight conducted on a quarterly basis at the management level and periodic reviews at the Board and committee levels.

Management competency on environmental issues

Coforge ensures that management personnel responsible for ESG and environmental matters possess the necessary competencies to effectively oversee sustainability priorities. This includes a combination of domain expertise, structured capability building, and ongoing training on environmental regulations, climate risks, and sustainability frameworks.

Senior leadership, ESG Steering Group members, and functional leads are regularly engaged through:

- periodic training and awareness sessions on environmental and climate-related topics
- exposure to evolving regulatory requirements and global ESG frameworks
- participation in internal and external sustainability initiatives and knowledge platforms

In addition, specific roles such as the Sustainability Team and Environment, Health & Safety (EHS) function are staffed by professionals with relevant technical expertise and experience, ensuring informed decision-making and effective implementation of environmental programmes.

By clearly defining roles, responsibilities, and oversight mechanisms, Coforge's ESG governance framework ensures disciplined execution, accountability, and integration of ESG priorities into business strategy. This structured approach supports regulatory compliance, enhances operational resilience, and reinforces Coforge's commitment to sustainable, ethical, and responsible growth.



Compensation linked to ESG

ESG KPIs form an integral part of the performance management process for CxOs, leadership teams, and the Chief Sustainability Officer, ensuring alignment with the organisation's sustainability objectives.

The following outlines ESG-linked performance metrics for key leadership roles

Chief Sustainability Officer (CSO)

- Driving sustainability strategy, including stakeholder engagement and identification of material ESG priorities.
- Achieving progress on net-zero commitments, climate targets, and diversity and inclusion goals.
- Enhancing ESG performance across global sustainability indices.
- Embedding responsible sourcing and value chain engagement across customers and suppliers.
- Promoting sustainability awareness through employee engagement, training, and communication initiatives.

Head – Administration

- Strengthening EHS awareness and compliance across operations through structured employee engagement.
- Driving energy efficiency and increasing adoption of renewable and low carbon energy solutions to reduce operational emissions.
- Improving resource efficiency across energy and water consumption, supporting the organisation's decarbonisation agenda.
- Advancing waste circularity through reduction, reuse, recycling, and composting initiatives across facilities.
- Ensuring compliance with ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health & Safety) in all delivery locations across India.
- Leading implementation of ISO 50001 (Energy Management System) by FY27 to enable structured tracking, optimisation, and reduction of energy consumption.

Chief People Officer (CPO)

- Driving diversity, equity, inclusion & belongingness (DEIB) strategy, with a focus on gender diversity and building an inclusive workplace culture.
- Upholding human rights and fair labour practices across operations, aligned with global standards, including SA8000 principles.
- Strengthening employee wellbeing, engagement, and development through structured HR frameworks and programmes.
- Embedding responsible workplace practices across the value chain, including ethical conduct, non-discrimination, and employee rights.
- Enhancing organisational performance through recognition in workplace and people-centric indices (e.g., Great Place to Work® and Best Workplaces rankings).





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