

NEXT EDUCATION INDIA PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

| | |
|---------------|--|
| | |
| Title | CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY |
| Version | 1.0 |
| Authorised By | CSR Committee |

NEXT EDUCATION INDIA PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Contents

| | |
|----|----------------------------|
| 1 | PREFACE |
| 2 | PURPOSE |
| 3 | POLICY STATEMENT/VISION |
| 4 | SCOPE |
| 5 | GOVERNANCE |
| 6 | CSR BUDGET |
| 7 | TREATMENT OF SURPLUS |
| 8 | MONITORING |
| 9 | REPORTING |
| 10 | CSR PROGRAMME/PROJECT |
| 11 | AREAS FOR CSR INTERVENTION |

1. PREFACE:

From the outset, CSR activities at Next Education India Private Limited (hereafter referred to as 'NEIPL' or 'COMPANY') are in existence for the benefit of the society by way of keeping the surrounding clean, avoiding paper products, participating in festivals, etc.

CSR covers the entire process through which an organisation approaches, defines and develops its relationships with stakeholders for the common good, and demonstrates its commitment by adopting appropriate strategies and projects. Thus, CSR is not charity or mere donations but a way of going beyond business as usual, creating shared values and contributing to the social and environmental well-being.

With effect from April 1, 2014, every company, be it private limited or public limited, which either has a net worth of Rs 500 crore, a turnover of Rs 1,000 crore, or a net profit of Rs 5 crore, needs to spend at least 2% of its average net profit for the immediately preceding three financial years on CSR activities. The activities should not be undertaken in the normal course of business and must be with respect to any of the activities mentioned in Schedule VII of the 2013 Act.

2. PURPOSE:

The key objectives of this policy can be described as follows

- Define what CSR means to a company and the approach adopted to achieve its goals.
- Define the kind of projects/programmes that will come under CSR.
- Identify the broad areas of intervention in which the company will undertake projects/programmes.
- Serve as a guiding document to help execute and monitor CSR projects.
- Budget the expenditure for CSR activities for the year.
- Elucidate criteria for partner implementation agencies.
- Explain the manner in which the surpluses from CSR projects will be treated.

3. NEIPL's CSR POLICY STATEMENT:

The CSR Policy of NEIPL focuses on addressing the social, environmental and economic needs of the marginalised/underprivileged/talented sections. Through this policy, we align our CSR strategy with the company's vision and goals. We adopt an approach that integrates the solutions to these problems into the strategies of the company in order to benefit the communities at large and generate social and environmental value.

4. SCOPE:

As a practice, we classify only those projects that are over and above our normal course of business as CSR. The scope of our CSR strategy will not only have a wide impact on the society and community at large, but will also remain committed towards sustainable development and inclusive growth. This policy applies to all our CSR projects and will be further reviewed and

updated.

5. GOVERNANCE:

The CSR Committee of NEIPL will consist of three Directors of the Company – Mr. Beas Dev Ralhan, Mr. Daljit Bajwa Singh and Mr. Raveendranath Kamath MV. The responsibilities of the CSR Committee are as follows:

- Formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken, as specified in Schedule VII of the Companies Act 2013.
- Suggest areas of intervention to the Board of NEIPL.
- Approve projects that are in line with the CSR policy.
- Recommend the amount of budgeted expenditure to be incurred on the activities referred above.
- Monitor the CSR policy and activities of the company on a quarterly basis.
- Approve projects/activities of value which are outside the gambit of Schedule VII.
- Meet at least once a year to review the progress made.

6. CSR BUDGET:

The total budget for the CSR projects will be decided by the CSR Committee.

7. TREATMENT OF SURPLUSES:

Any surplus generated from CSR projects will be tracked and channelised into the CSR corpus. These funds will further be used in the development of the CSR projects and will not be added to the normal business profits of the company.

8. MONITORING:

The CSR committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the projects/programmes/activities proposed to be undertaken by the company.

The CSR committee would be responsible for monitoring the approved projects and funds disbursements for such projects/programmes. Monitoring mechanisms will include visits, meetings and progress / status report / programme team. A system will be put in place to maintain a transparent monitoring and reporting mechanism across all stakeholders involved in the CSR activities of the company, as desired by the CSR Rules (Section 135, Companies Act, 2013).

9. REPORTING:

Significant CSR activities and achievements will be reported as part of the Board's Report in the company's Annual Report and also as per any other statutory and regulatory reporting requirements.

10. CSR PROGRAMMES/PROJECTS:

The NEIPL is highly supportive of the involvement of its employees in its CSR initiatives and in the community activities/charities of their choice, and will therefore proactively engage with the employees and other key stakeholders to solicit their active involvement.

To provide a focused and structured approach to the CSR policy programmes, the company will spend on specified pre-determined causes and areas of intervention as outlined in the Annexure to the Policy. The CSR committee would promulgate appropriate details of the proposed projects including the year of implementation, modalities of execution in the areas/sectors chosen, schedules of implementation for the same, etc. The CSR committee will consider and approve the CSR projects/programmes to be undertaken during the year.

- The company will ensure that its CSR projects are non-discriminatory in nature and do not have any restrictive political or religious affiliations.
- The programmes/projects will be within the area recommended/listed by the CSR Committee and mentioned in the Policy.
- The programmes/projects will be beyond the company's normal course of business.
- The programmes/projects will be implemented within the country and preferably in the areas where the company has its presence.
- The company will actively consider the programmes/projects that have been identified by the employees and also those where employees are directly involved through volunteering.
- Programmes/projects that integrate business models with social and environmental impact will be encouraged.
- The company will consider Programmes/projects which are closely linked with the principles of sustainable development.
- The programmes/projects should not be exclusively for the benefit of the employees of the company or their family members.

11. AREAS OF CSR INTERVENTION (Annex.1):

- **HUNGER, POVERTY, MALNUTRITION AND HEALTH** – Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation, contributing to the Swachh Bharat Kosh set-up by the Central Government of India for the promotion of sanitation and to making safe drinking water easily available for all.
- **EDUCATION AND LIVELIHOOD** – Promoting education, especially vocational education among children, women, elderly, and the differently abled, to enhance their livelihoods.
- **GENDER EQUALITY AND WOMEN EMPOWERMENT** – Promoting gender equality,

empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by the socially and economically backward.

- **ENVIRONMENTAL SUSTAINABILITY** – Ensuring environmental sustainability; promoting ecological balance, flora and fauna, animal welfare, agroforestry; conserving natural resources; improving the quality of soil, air and water as well as contributing to the Clean Ganga Fund set-up by the Central Government of India for the rejuvenation of the river Ganga.
- **NATIONAL HERITAGE, ART AND CULTURE** – Protecting the national heritages, art and culture; restoring buildings and sites of historical importance and works of art; setting up public libraries; promoting and developing traditional arts and handicrafts.
- **ARMED FORCES AND VETERANS** – Promoting measures for the benefit of the armed forces veterans, war widows and their dependents.
- **SPORTS** – Providing trainings to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports as well as sponsoring of talented sports people.
- **ETHNICITY** – Contributing to the Prime Minister's National Relief Fund or any other fund set up by the Central Government of India for the socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
- **TECHNOLOGY INCUBATION** – Contributing or funding technology incubators located within the academic institutions which are approved by the Central Government of India.
- **RURAL DEVELOPMENT AND SLUM DEVELOPMENT** – Promoting rural development projects and developing slum areas.