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## **NAVNEET EDUCATION LIMITED**

## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

## I PREFACE

Policy Title	-	Corporate Social Responsibility Policy (CSR Policy)
Authorised by	-	Board of Directors
Requirement under	-	The Companies Act, 2013

## II OBJECTIVE

The main objective of Corporate Social Responsibility Policy (CSR Policy) is to lay down guidelines for Corporate Social Responsibility Activities of Navneet Education Limited ('the Company' or 'Navneet').

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## III DEFINITIONS

'**Board**' means the Board of Directors of the Company.

'**The Act**' means the Companies Act, 2013.

'**CSR or Corporate Social Responsibility**' means and includes but is not limited to:

- (i) Projects or programs relating to activities specified in Schedule VII of the Companies Act, 2013; or
- (ii) Projects or programs relating to activities undertaken by the Company in pursuance of the recommendations of the CSR Committee and approved by the Board as per this policy.

'**CSR Committee**' means Corporate Social Responsibility Committee constituted by the Board pursuant to Section 135 of the Companies Act, 2013.

**‘The Company’** or ‘Navneet’ means Navneet Education Limited.

**‘Net Profit’** means the net profit of the company as per its financial statement prepared in accordance with the applicable provisions of the Companies Act, 2013 (previously the Companies Act, 1956), but shall not include the following namely:

- (i) any profit arising from any overseas branch or branches of the Company or otherwise, and
- (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Companies Act, 2013.

The words and expression used in this policy and not defined herein but defined under the Companies Act, 2013 shall have the meanings respectively assigned to them therein.

#### IV THE CONCEPT

The concept of CSR has been introduced in the Companies Act, 2013. Navneet understands its responsibility towards the society in which it carries on the business activities.

Even though the CSR provisions have been enacted with effect from F.Y. 2014-15, Navneet has voluntarily shouldered its responsibility towards the Society by implementation of various CSR activities for the development of a better Society. Navneet understands its social responsibilities and has been engaged in these activities since several years. Navneet does not stop only with spending of money towards CSR but actually monitors on ground level the utilisation and chanelisation of resources in most optimal manner and strives to ensure that the benefit of these initiatives reach to the needy section of the Society at large.

#### V CURRENT SOCIAL ACTIVITIES

Navneet, being in the business of publication of books, continues to use eco-friendly materials for most of its major products catering to environmental needs. Navneet also continues with its corporate social responsibility initiative and donates mainly in areas of medical aid, education and rehabilitation programmes.

#### VI PRESENT NEED

With the enactment of the Companies Act, 2013, the concept of Corporate Social Responsibility has gained legal importance. The provisions of Companies Act, 2013, recommend minimum prescribed spending on CSR activities to certain class of companies.

With this guiding principle Navneet is determined to bring together its ongoing activities along with new activities towards the development of the Society and frame one comprehensive policy under the head “Corporate Social Responsibility (CSR)”.

The principles encompassed in this policy have been developed according to the requirements of the Companies Act, 2013 and the Rules made there under.

## VII STRATEGY OF SPENDING

- (i) The Committee shall ensure that it spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.
- (ii) The Committee shall identify programs/projects in which the CSR initiatives/activities of the Company can be undertaken and recommend to the Board from time to time.
- (iii) The Committee shall recommend to the Board the amount of expenditure to be incurred by the Company on CSR activities and the Board will ensure that the activities as are included in the CSR Policy are undertaken by the Company subject to and in accordance with the provisions of Section 135 of the Act.
- (iv) The programs/projects can be undertaken through a registered trust/registered society or a company established under Section 8 of the Act having a track record of at least three years.
- (v) The Committee may invite such outside expert / consultant or any other person as it may deem fit for the purpose of CSR activities.
- (vi) CSR activities may also be undertaken in collaboration with other Companies.
- (vii) The Committee may also recommend allocation of certain portion of the CSR spend for some identified activities/projects.
- (viii) The programs/projects/activities which benefit only to the employees of the Company and their families shall not be considered for CSR activities.
- (ix) The Committee shall endeavor for CSR capacity building of the personnel of the Company and / or of the institution carrying CSR activities of the Company and not more than 5% of the total CSR budget shall be spent on such CSR capacity building exercise.
- (x) Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR activity.
- (xi) The composition of CSR Committee shall be as disclosed in the Annual Report of Navneet.

## VIII. AREA OF ACTIVITIES

The CSR policy would include the following activities for achieving its Corporate Social Responsibility:

- (i) eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
- (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measures for the benefits of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) contribution to the Prime Minister's National Relief Fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) rural development Projects.

## IX MODALITIES OF EXECUTION /IMPLEMENTATION

The activities to be undertaken by the Company as CSR activities shall be the projects/ programs relating to the activities/subjects specified enumerated in the Schedule VII of the Companies Act, 2013 or any amendment thereto or modification thereof from time to time.

CSR activities may be initiated / implemented/ executed by the Company or through:

- (i) A registered trust, registered society, registered NGO or by a company established by the Company or its subsidiary or associate company under Section 8 of the Companies Act, 2013;
- (ii) If such trust, society or company is not established by the Company or its holding or subsidiary or associate company, the eligible CSR activities will be undertaken in collaboration with a specialized organization institution or agency which has an established track record of at least three years in undertaking CSR projects or in carrying on permissible CSR activities.
- (iii) An agreement/ contract or any other written communication will be executed by the Company.

The Committee shall from time to time decide/recommend to the Board on, CSR activities to be undertaken, the geographical area covered, agencies or trusts or NGO's with which the projects/activities are to be undertaken, the amount to be spent on various projects whether on going or fresh or new projects.

CSR Committee shall have full discretion to specify or modify the modalities of execution of CSR projects or programs and to determine implementation schedule.

While deciding on the CSR activities, priority shall be given to the needs and requirements of communities or local area and areas around, in the vicinity of the Registered Office as well as various showrooms of the Company are situated.

The CSR activities shall be undertaken within India.

#### X MONITORING MECHANISM

- (i) The Committee shall on completion of every Financial Year, submit to the Board, details of the CSR spent during the Financial Year and reasons for the actual spent being less than the limits prescribed by the law, if any.
- (ii) The report on CSR shall form part of Boards' Report (Directors' Report) of the Company.
- (iii) The Committee shall recommend changes/modifications to be carried out in the policy to the Board from time to time.