



Recognized as the High Performing Partner of NSDC for the financial year 2012-13 | Award for 'Excellence in Training' at the World HRD Congress for three consecutive years (2010-12)

CENTUM LEARNING LIMITED – CSR POLICY

1. PREAMBLE

This CSR policy has been approved by the Board of Directors of Centum Learning Limited ('Centum') pursuant to the provisions of Section 135 of the Companies Act, 2013 with an objective to provide guidance and direction to undertake CSR initiatives in a more structured and unified manner.

2. SCOPE OF CSR ACTIVITIES

2.1 The focus of CSR interventions at Centum Learning Limited will be centered around the following issues:

- 2.1.1 Promoting education for underprivileged sections of the society (school/college/technical/vocational).
- 2.1.2 Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports.
- 2.1.3 Contribution to the Prime Minister's National Relief Fund.
- 2.1.4 Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
- 2.1.5 Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
- 2.1.6 Rural development projects.
- 2.1.7 Promoting gender equality, empowering women and measures for reducing inequalities faced by socially and economically backward groups.
- 2.1.8 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.

3. MODALITIES OF EXECUTION & IMPLEMENTATION SCHEDULE:

The CSR Committee will be responsible for overseeing the approval, execution, implementation and monitoring of the project.

In case the Company undertakes to carry any of the projects through any trust, society or company not established by the company or its holding or subsidiary or associate company, the CSR Committee shall ensure that such trust, society or company has an established track record of three years in undertaking similar programs or projects and is eligible to undertake the projects under Section 135 of the Act.

3.1 CSR Budget

- 3.1.1 The CSR Committee under the supervision of the Board shall ensure that the Company spend in each Financial Year (FY), at least two per cent of the average net profit (calculated as per Section 198 of the Act) made during the three immediately preceding FYs (CSR Budget).
- 3.1.2 If the Company fails to spend the 2% of its average net profit as mentioned above, it will report the reasons for not spending the entire Budget outlay for CSR allocated in any financial year.
- 3.1.3 The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.
- 3.1.4 To comply with the obligations under Clause 3.1.1, the CSR Committee may also decide to contribute amount of CSR Budget, either wholly or partially toward Corpus of Bharti Foundation or such other foundation as may be approved by the Board.

3.3 Targets and performance measures

To ensure effective implementation, the Committee will set measurable targets for each CSR project and Funds for such projects.

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4. MONITORING

The CSR Projects shall be monitored at various level as follows:

4.1 Shareholders

The details about the policy developed and implemented by the company on corporate social responsibility, initiatives taken during the year and details of CSR spent during the financial year shall be disclosed in the Annual Report of the Company.

4.2 Board Level

The Board shall review, once in a year, the CSR initiatives of the Company including amount spent thereon.

4.3 At Committee Level

The CSR Committee will be monitoring the CSR Policy on periodic basis and will be responsible for the followings.

- 4.3.1 Closely monitor the utilization of funds towards approved CSR Activity;
- 4.3.2 Set targets for the CSR commitments and performance measures
- 4.3.3 Evaluate CSR performance and CSR impact

4.4 CSR Head

The following activities will be undertaken by the CSR head as a part of Monitoring:

- 4.4.1 Regular field visits to Project / Programme sites, activity-wise.
- 4.4.2 Regular interaction with beneficiary communities to obtain feedback;
- 4.4.3 Compilation of monthly field visit Reports at regular intervals.

4.5 Documentation and Reporting:

As part of compliance to the Act, and in preparation of the Annual CSR Report as per Reporting Format in Annexure III, the Head CSR of the Company will ensure the following:

1. All CSR Projects / Programmes are comprehensively documented.
2. An MIS is maintained on spending across sectors, geographies and beneficiaries impacted.
3. The MIS architecture will be developed keeping in mind the prescribed Reporting Format as per the Rules.
4. Accountability is fixed at every level of the CSR process and the implementation apparatus.
5. A repository of case studies and good practices will be compiled to learn from and build upon successful interventions.
6. Strategic brand building for the Company can be taken up through effective collaboration between development communications and the corporate & market communication teams within the organization.