



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

RADCLIFFE EDUCATION PRIVATE LIMITED

Version No.	1.1
Authorized by	CSR Committee

1. PREFACE

The Company ('Radcliffe Education Private Limited) always strives to improve the lives of the society in which it operates its business. It also assures no harm to the community and environment where it carries itself. The Company is not just inclined towards earning profits but also takes care of the society as a whole. Through this formal policy, the company aims at serving the society in a better way; though it already contributes towards CSR activities even before forming this policy and without being legally bounded to form such a policy as per Companies Act, 2013.

2. OBJECTIVE AND SCOPE

The objective of this policy is to contribute to the sustainable development of the society and environment, and to make our planet a better place for the future generations. The Policy will also ensure the sense cooperation by the company towards the CSR activities.

This Corporate Social Responsibility Policy is being formulated in compliance with Section 135 of the Companies Act, 2013 read along with Schedule VII and the applicable rules thereto. This policy on social responsibility has been formulated by Corporate Social Responsibility Committee (CSR Committee) and has been approved by the Board of Directors.

This Policy shall act as a guideline to adhere with the CSR norms in a true spirit and to give the binding effect to the Corporate Social Responsibility activities.

3. DEFINITIONS

The terms defined in this CSR Policy shall have the meanings herein specified and terms not defined shall have the meanings as defined in the Companies Act, 2013 and Companies (Corporate Social Responsibility) Rules, 2014 including any statutory modifications or re-enactments thereof.

- 3.1 "Act" means the Companies Act, 2013 including any statutory modification or re-enactment thereof.
- 3.2 "Company" means Radcliffe Education Private Limited.
- 3.3 "CSR" means Corporate Social Responsibility.
- 3.4 "CSR activities" means the activities or projects or programmes as recommended by the CSR Committee and approved by the Board, undertaken by the Company from time to time in any one or more of the areas falling under the Schedule VII to the Companies Act, 2013.
- 3.5 "CSR Committee" means the Committee of the Board constituted under section 135 of the Act for the purpose of administration of CSR activities, supervising the adherence of this CSR Policy and the matter incidental thereto.
- 3.6 "CSR Policy" means the Corporate Social Responsibility Policy as set out herein and as amended or modified from time to time.

- 3.7 “CSR Rules” means Companies (Corporate Social Responsibility) Rules, 2014.
- 3.8 “Board” means the Board of Directors of the Company.
- 3.9 “Board’s Report” shall mean report of the Board of Directors prepared in accordance with section 134(3) of the Companies Act, 2013.
- 3.10 “Net Profit” & “Average Net Profit” means profit calculated as per Section 198 of the Companies Act, 2013.

4. FOCUS AREAS

As per Section 135 of the Companies Act, 2013, The Company’s CSR activities may focus on and/or include the following:

- 4.1 Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- 4.2 Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- 4.3 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 socially and economically backward groups.
- 4.4 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
- 4.5 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 art and handicrafts.
- 4.6 Measures for the benefit of armed forces veterans, war widows and their dependents.
- 4.7 Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports.
- 4.8 Contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
- 4.9 Contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.
- 4.10 Rural development projects.
- 4.11 Slum area development.
- 4.12 Disaster management, including relief, rehabilitation and reconstruction activities.

4.13 Any other activity as the company may deem fit for the sustainable development of the society.

5. COMPOSITION OF CSR COMMITTEE

Since the Company is not required to appoint an independent director under sub-section (4) of section 149 of the Companies Act, 2013, therefore, the CSR committee shall consist of the following directors:

- I. Mr. Amit Rai
- II. Mr. Gagan Oberoi
- III. Mr. Prithvi Raj Singh

6. RESPONSIBILITIES OF THE COMMITTEE

Following shall be the responsibilities of CSR Committee:

- a) To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII;
- b) To recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
- c) To monitor the Corporate Social Responsibility Policy of the company from time to time; and
- d) To Submit the Reports to the Board in respect of the CSR activities undertaken by the Company

7. RESPONSIBILITIES OF THE BOARD

The Board of the Company Shall:

- a) After taking into account the recommendations made by the Corporate Social Responsibility Committee, approve the Corporate Social Responsibility Policy for the company and disclose contents of such Policy in its report and also place it on the company's website, if any, in such manner as may be prescribed; and
- b) Ensure that the activities as are included in Corporate Social Responsibility Policy of the company are undertaken by the company.

8. EXPENDITURE ON CSR

The Board of Company shall ensure that the company spends, in every financial year, at least **two per cent. (2%)** of the average net profits of the company made during the three immediately preceding financial years in pursuance of its Corporate Social Responsibility Policy:

Provided that the company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities:

Provided further that if the company fails to spend such amount, the Board shall, in its report made under clause (o) of sub-section (3) of section 134, specify the reasons for not spending the amount and, unless the unspent amount relates to any on-going project referred to herein below phrase, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Any amount remaining unspent as mentioned in above paragraph, pursuant to any on-going project, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

9. EFFECTIVE DATE

This policy is effective from October 01, 2019.

10. CONCLUSION

- I. This CSR Policy is subject to revision/amendment in accordance with the guidelines as may be issued by the Government, from time to time.
- II. The Board may review the policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable modifications, as may be necessary.