

Corporate Social Responsibility Policy

Contents

- Introduction
- Scope and Objectives
- CSR Projects, Programs and Activities
- Governance Structure
- CSR Budget
- Implementation, Monitoring and Review Mechanism
- Annexure – 1 Present Identified Partners for CSR Activities

INTRODUCTION

Pearson India Education Services Private Limited (hereinafter referred to as “Pearson” or “the Company”) is a part of Pearson PLC, UK and its operations In India date back to 1997. Since then, the company has carved a niche in the education segment by catering to the needs of learners and educators alike. From high-quality courseware to new age, innovative digital solutions, Pearson strives to create a dynamic learning ecosystem for today’s learners.

The mission of the Company is to add life to a lifetime of learning. As the world’s lifelong learning company, we believe we have a duty to help drive that change and deliver against our purpose. We want to give learners an opportunity for a personal breakthrough and help them realize the life they like to imagine through quality learning and our strength lies in our unanimous effort to make a difference.

SCOPE & OBJECTIVES

In conformity with requirements laid down under The Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as “the CSR Rules”) issued by the Ministry of Corporate Affairs (“MCA”), under Section 135 of the Companies Act, 2013, a CSR Policy, was adopted by the Board of Directors dated 8th March 2019. Thereafter due to accumulated losses for succeeding financial years, the CSR provisions became inapplicable or inappropriate for the Company. Since Pearson India satisfied the net profit criteria in the preceding financial year 2023-24, the CSR provision became applicable to it. Subsequently, over a period of time, there were various amendments brought in by the Government of India and thus the updated policy has been designed in alignment with its objectives, principles and values for delineating its responsibility as a socially and environmentally responsible corporate citizen

This Policy will be applicable in India to all CSR Projects, Programs and activities undertaken by the Company either directly or through entities as mentioned in Companies (Corporate Social Responsibility) Rules as amended from time to time for the benefit of different segments of the society

The objective of this policy is:

- To promote lifelong education among undeserved and disadvantaged groups
- To initiate projects that benefit communities
- To encourage commitment from employees towards CSR activities and volunteering,
- To generate goodwill in communities in the name of Company

CSR PROJECTS, PRPGRAMS AND ACTIVITIES

The Company shall promote and undertake CSR activities/Projects in consonance with Schedule VII of the Companies Act, 2013 as entailed hereunder:

- i. Eradicating hunger, poverty, and malnutrition
- ii. Promoting education
- iii. Promoting gender equality
- iv. Ensuring environmental sustainability
- v. Protection of national heritage, art, and culture
- vi. Measures for the benefit of armed forces veterans and their dependents
- vii. Training to promote rural, nationally recognized sports.
- viii. Contribution to relief funds
- ix. Research and development i.e. contribution to incubators or research projects in science, technology, engineering, and medicine.
- x. Rural Development projects
- xi. Slum area development.
- xii. Disaster Management including relief, rehabilitation and restructuring activities.
- xiii. Any other activities as may be prescribed by the government from time to time.

Our CSR focus areas and programs which align to the causes/beneficiaries as listed above will be as under:

- A. *Promoting lifelong education among undeserved and disadvantaged groups*
- B. *Enhancing livelihoods through skills development programmes across urban, semi-urban and rural areas.*

The above activities shall be supported by the Company by any of the following modes:

- i. Cash or in-kind donations to Indian charitable organizations aligned with the identified thrust areas.
- ii. Volunteering / Giving: All Pearson employees can use up to Five paid volunteer days a year for charitable work.

CSR Activities of the Company for financial year 2024-25 is attached as ***Annexure I*** to this Policy. The Company may take up other CSR activities during the financial year, as may be considered appropriate in accordance with approval of CSR Committee and the Board in absence of CSR Committee.

GOVERNANCE STRUCTURE

Pearson India is committed to implementing its Corporate Social Responsibility (CSR) activities with a robust governance framework. This framework ensures that all CSR initiatives are conducted in compliance with Section 135 of the Companies Act 2013 and the associated rules. The governance structure includes clear roles and responsibilities for the Board of Directors and the CSR Committee, ensuring effective oversight and accountability.

Role of Board of Directors:

- i. To form a CSR committee.
- ii. To approve the CSR policy after taking into account the recommendations made by the CSR Committee.
- iii. To disclose contents of such Policy in its report and also place it on the company's website, if any.
- iv. To ensure that the activities as are included in CSR Policy of the company are undertaken by the company.
- v. To give preference to the local area and areas around the company where it operates, for spending the amount earmarked for CSR activities; and
- vi. To ensure that 2% of the average net profits for the past three financial years is spent by the Company on the CSR activities.

Role of CSR Committee:

- i. To formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the Company in areas or subject, specified in Schedule VII.
- ii. To recommend the amount of expenditure to be incurred on the activities referred to in previous bullet; and
- iii. To monitor the CSR Policy of the Company from time to time.
- iv. Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be decided from time to time.

Currently Company has five whole time directors on its Board. Further being an unlisted Company, Pearson India is not required to appoint an Independent Director accordingly the Company would be required to form a CSR committee as per provisions of the Act.

However, formation of CSR Committee is not required during the current Financial Year 2024-25 as the CSR expenditure does not exceed 50 Lakhs (Rupees Fifty Lakhs) hence the Board shall assume the responsibility of the CSR Committee and as soon as the threshold of the CSR expenditure increases, the Board shall take appropriate action to form CSR committee in accordance with the provisions of the Companies Act 2013.

CSR BUDGET

A specific budget will be allocated for CSR activities. This budget will be in accordance with the tenets of Section 135 of the Companies Act 2013 which shall be at least 2% of the average net profits of the Company made during the three immediately preceding financials years. Any surplus arising out of the CSR Projects or programs or activities shall not form part of the business profit of the Company.

IMPLEMENTATION, MONITORING AND REVIEW MECHANISM

The CSR activities will be driven under the guidance and support of the CSR Committee and the Board. The CSR Committee will play a significant role in ensuring that the CSR policy is embedded across the Company operations and the CSR initiatives are in line with this policy.

The CSR Committee will be responsible for monitoring approved projects and fund disbursements for such projects. The CSR Committee will put in place a transparent monitoring and reporting mechanism for ensuring effective implementation of the projects, programs and activities proposed to be undertaken by the Company. Such monitoring mechanisms will include visits, meetings and progress/status reporting by the project teams. Any or all provisions of this CSR policy may be amended by the Board based on the recommendations of the CSR Committee or in accordance with any statutory guidelines that may be issued from time to time. In absence of CSR Committee, the Board shall assume all the rights and responsibilities of the Committee.

Modes of implementation

Pearson India has the option to implement CSR activities through the following modes:

- i. directly on its own;
- ii. through its own non-profit foundation set-up so as to facilitate the initiative; or
- iii. through independent registered non-profit organization that have a record of at least 3 years in carrying out similar projects or programs as provided in Schedule VII of the Companies Act; or
- iv. through any entity established under an Act of Parliament or a state legislature; or
- v. Collaborating or pooling their resources with other companies.

CSR Reporting Framework:

- i. Annual Report in CSR shall form part of Board's Report and it shall be signed by the Chief Executive Officer/ Managing Director/ Director of the Company along with the Chairman of the CSR committee as stipulated in the statutory provisions of the Companies Act 2013.
- ii. In case, Pearson India has an average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.
- iii. In case of ongoing project, the Board of Directors of the Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation.
- iv. Disclose the contents of CSR Policy in the Board's report and also place it on the company's website, if any; and

Dated: March 7, 2025

Place: Bangalore

Annexure 1**CSR Budget Plan for FY 24-25**

Based on the calculation of 2% of the average net profit made during the three-immediately preceding financial years, the CSR budget of the Company is **Rs 40 Lakhs (Rupees Forty Lakhs only)** approx. for the Financial Year 2024-25.

CSR Action Plan for FY 24-25:

Please find below details of CSR Programs of the Company:

S No.	Mode of Implementation - Through Implementing Agency		Purpose
	Name	CSR Registration Number	
1	NSDC	CSR00005903	Promoting Education
2	HCL Foundation	CSR00001087	Promoting Education