

BUSINESS RESPONSIBILITY REPORT

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1. Corporate Identity Number (CIN) of the Company	L74899DL1981PLC015865
2. Name of the Company	NIIT Limited
3. Registered address	8, Balaji Estate, First Floor, Guru Ravi Das Marg, Kalkaji, New Delhi – 110 019, India
4. Website	www.niit.com
5. E-mail id	investors@niit.com
6. Financial Year reported	April 1, 2019 to March 31, 2020
7. Sector(s) that the Company is engaged in (industrial activity code-wise)	Group: 854
8. List three key products/services that the Company manufactures/provides (as in balance sheet)	Instructor-led and Online Training Services in Technology, Healthcare, Banking & Financial services; Managed Training Services, Learning content development services, Sale of courseware and training material.
9. Total number of locations where business activity is undertaken by the Company (a) Number of International Locations (Provide details of major 5) (b) Number of National Locations	<p>i. 29 international locations. Company's main subsidiaries are at:</p> <ul style="list-style-type: none"> a. Atlanta, Georgia, USA b. London, UK c. Dublin, Ireland d. Shanghai, RPC e. Mississauga, Ontario, Canada <p>ii. 35 national locations</p>
10. Markets served by the Company – Local/State/National/International	India, China, Africa, North America, Europe, Oceania

SECTION B: FINANCIAL DETAILS OF THE COMPANY FOR FY20

1. Paid up Capital (INR)	283.03 Million
2. Total Turnover (INR)	4,008.57 Million
3. Total profit after taxes (INR)	13,683.64 Million
4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	Not significant as average annual profit over FY17 to FY19 were below CSR spending threshold level.

SECTION C: OTHER DETAILS

1. Does the Company have any Subsidiary Company/Companies?	The Company has four subsidiaries in India and seven direct subsidiaries outside India. Each company does their own business responsibility and CSR activities e.g., Company's subsidiaries in India have provided scholarships for deserving students for their higher education; given their IPR for Hole-In the Wall Learning stations and skills training material approved by NSDC (National Skills Development Corporation) to the NGO NIIT Foundation, to help reach such programs to the underserved communities and create livelihoods.
2. Do the Subsidiary Company/Companies participate in the BR (Business Responsibility) Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)	
3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]	The Company has suppliers and business licensees in India and outside. Their BR initiatives are driven by the needs in the communities in their proximity. Though many of them get to learn about the BR initiatives of the Company, the Company does not insist on their automatic participation.

BUSINESS RESPONSIBILITY REPORT (Contd.)

SECTION D: BR INFORMATION

1. Details of Director/Directors responsible for BR

The Corporate Social Responsibility (CSR) Committee of the Board has the following members:

SI No.	Name	DIN	Designation
1	Mr Ravinder Singh	08398231	Independent Director & Chairman, CSR Committee
2	Mr Anand Sudarshan	00825862	Independent Director
3	Mr Rajendra S Pawar	00042516	Chairman & Non-Executive Director
4	Mr Vijay K Thadani	00042527	Vice Chairman & Managing Director

2. Principle-wise (as per NVGs) BR Policy/policies

Principles [P] as per National Voluntary Guidelines [NVG]

P1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

P2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycles

P3: Businesses should promote the wellbeing of all employees

P4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

P5: Businesses should respect and promote human rights

P6: Business should respect, protect, and make efforts to restore the environment

P7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner

P8: Businesses should support inclusive growth and equitable development

P9: Businesses should engage with and provide value to their customers and consumers in a responsible manner

(a) Details of compliance (Reply in Y/N)

No.	Questions	P	P	P	P	P	P	P	P	P
		1	2	3	4	5	6	7	8	9
1	Do you have a policy/ policies for each of the principles?	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	Does the policy conform to any national / international standards? If yes, specify? (50 words)	The policies have been created and improved based on good general management practices over the last 38 years of the life of the Company. In certain cases like environment & safety policy, international standards like ISO get applied.								
4	Has the policy being approved by the Board? Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	Y	Y	Y	Y	Y	Y	Y	Y	Y
5	Does the company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	Y	Y	Y	Y	Y	Y	Y	Y	Y

BUSINESS RESPONSIBILITY REPORT (Contd.)

No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
6	Indicate the links for the policy to be viewed online?	a. NIIT Vision, Values and Beliefs statement [https://www.niit.com/authoring/NewsRoom/MediaKit/VISION.pdf] b. Code of conduct https://www.niit.com/authoring/Documents/Corporate%20Governance/codeofconduct.pdf c. Whistleblower policy https://www.niit.com/india/training/investors/Pages/investor-information.aspx d. CSR Policy https://www.niit.com/authoring/Documents/Other%20Disclosures/CORPORATE%20SOCIAL%20RESPONSIBILITY%20POLICY.pdf All other operative policies for the Company, e.g., Environment policy, Procurement policy & process, Policy against sexual harassment, Equal Opportunity Policy, Information Security policy, HR benefits and policies, Environment policy, Business Continuity Policy, Disciplinary policy are available to the employees on the secure company intranet.								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
8	Does the company have in-house structure to implement the policy/ policies.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9	Does the company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
10	Has the company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	Y	Y	Y	Y	Y	Y	Y	Y	Y

(b) If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
1	The company has not understood the Principles	Not Applicable								
2	The company is not at a stagewhere it finds itself in a position to formulate and implement the policies on specified principles									
3	The company does not have financial or manpower resources available for the task									
4	It is planned to be done within next 6 months									
5	It is planned to be done within the next 1 year									
6	Any other reason (please specify)									

BUSINESS RESPONSIBILITY REPORT (Contd.)

3. Governance related to BR

- (a) Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year

The Company's BR performance shall be reviewed and assessed on an annual basis

- (b) Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

The Company is now publishing its first Business Responsibility report along with the Annual report for the financial year 2019 - 20. From now on, this will be published annually.

- (c) Water Conservation: The Company is sensitive to the crucial value of water conservation and hence focused on saving water resources. The strategy adopted is Reduce-Reuse. To this end, many plans have been implemented, including installation of waterless urinals, replacement of old taps with sensor based taps and aerator taps and operation of STP (sewage treatment plant). The STP is being upgraded in order to use more recycled water to meet the needs of horticulture and non-drinking purposes.

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional):

- (a) Reduction during sourcing/production/distribution achieved since the previous year throughout the value chain?

- (b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

The Company is engaged in delivering training services in areas defined earlier and not engaged in any manufacturing activity. The initiatives taken for reduction of consumption of water and fossil fuel based energy are explained in (1) above.

3. Does the company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably?

The Company has taken up many initiatives to promote sustainable sourcing. Since this is a people-based business, need for frequent travel for internal and client meetings are a norm. To reduce the carbon footprint, Company has started a massive focus on promoting online methods of conferencing, minimizing use of paper by insisting on e-documents with workflow and canvassing for double side printing and reuse of consumables. The transport management for bringing employees to work and taking them back home has been made highly efficient using GPS and route optimization. The transportation deployed by the Company uses CNG (Compressed Natural Gas) fuel. Employees are also encouraged to use carpooling and ride share, leading to reduction in carbon footprint.

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

The Company has engaged the services of many local businesses and communities around our office locations – these include transport services and security services that employ local population and small vendors. Further, local youth are engaged in operating the food shops/ canteen in the premises of the Company. This practice helps improves their socio-economic conditions by providing employment to these youth.

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1

- Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs / Others?
- How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

NIIT is governed by the Company's Code of Conduct. The code of conduct is applicable to all employees and directors and it aims to uphold the standards of its business ethics and practices, which are required to be observed in all business transactions. This code is available on the Company's website <https://www.niit.com/authoring/Documents/Corporate%20Governance/Code%20of%20Conduct.pdf>.

No such complaints were received during the Financial Year 2019-20.

Principle 2

- List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/ or opportunities.
 - Green NIIT initiative : The Company is a services company. The Company is committed to plastic waste reduction and keeping this goal in mind all single use plastic like plastic straws, forks, spoons, plates, polybags have been banned inside premises and alternate cutlery made of wood or paper have been provided.
 - Solar Power Plant: The Company is committed to use renewable sources of energy. For this purpose, two solar power plants were installed at two of the large premises of the company. The Company now generates 86.4 kWp, which is helping it generate 290 units of electricity per day which aggregates to 100,000 units annually.

BUSINESS RESPONSIBILITY REPORT (Contd.)

5. Does the company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%).

The Company is committed to manage and dispose waste in a responsible manner. We work on the philosophy of sustainable use and try to recover, reuse or recycle consumables such as laptops, computers, copiers, and paper. Devices that have reached the end of useful life like computers, monitors, computer accessories, printer, projectors, and other such hardware are handed over to

authorized recyclers or E-waste disposal vendors. Wherever feasible, the use of paper is actively discouraged across the organization and internal processes have been aligned to process transactions through electronic submission of vouchers, receipts, invoices and other documents. The Company recycles water through a treatment plant in and for its premises at Gurgaon, which gets re-used for non-drinking purpose. At both the offices at Gurgaon, organic waste generated from cafeteria and other sources gets converted into compost.

Principle 3

1	Total number of employees	2600 worldwide including subsidiaries
2	Total number of employees hired on contractual fixed-term basis	101
3	Number of permanent women employees.	964 (37%) The Company promotes gender diversity by not only ensuring equal opportunity employment and career advancement but also by supporting women with gender specific initiatives. Some examples are: i. As a response to the safety issues faced during usage of transport by women in certain regions, a special facility is enabled for ensuring immediate, emergency assistance services during commute for all women employees. ii. Special baby-care program, wherein half-day, half-pay leave option is extended for a period of six months for women employees who are new mothers. This option which gets availed within the first year of child birth helps them pursue a career as well as devote additional time at home for the nurturance of the newborn(s). iii. Gender sensitivity training programs and awareness initiatives are conducted to sensitize and encourage staff towards appropriate behavior at the workplace.
4	Number of permanent employees with disabilities	4
5	Any employee association that is recognized by management	No The Company has a comprehensive people-friendly mechanism to listen to and address employee concerns in an effective and agile manner. i. Employee feedback and inputs are valued. There are several avenues of periodic interaction for an employee including quarterly townhall meetings with senior managers. ii. The NIITian 'ASSIST' function on the Staff Portal iNIITian allows the employees to post specific queries seeking clarifications, express concerns, give feedback and suggestions and seek specific support to fix/improve/handle issues at the workplace. iii. The Company has used modern technology and provided an engagement bot which initiates digital conversations with staff members at defined milestones of their tenure (six times a year for new joiners and bi-annually thereafter). The essence of these conversations is scanned for improvement of policies, workplace health and fun. iv. An annual Employee Satisfaction Survey gives an in-depth view of an employee's outlook on various perspectives impacting their lives at the workplace. v. Various employee-friendly policies addressing matters like maternity and paternity, care for children of employees, opportunity for social contribution, wedding allowance and loan, company leased accommodation and car, work from home, break from work and sabbatical have been introduced to foster overall employee wellbeing.

BUSINESS RESPONSIBILITY REPORT (Contd.)

6	Percentage of permanent employees who are members of this recognized employee association?	NA			
7	Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.	Sl. No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
		1	Child labour/forced labour/involuntary labour	NIL	NIL
		2	Sexual harassment	1	0
		3	Discriminatory employment	NIL	NIL
8	Percentage of under-mentioned employees who were given safety & skill up- gradation training in the last year? (a) Permanent Employees (b) Permanent Women Employees (c) Casual/Temporary/Contractual Employees (d) Employees with Disabilities	<p>i. Over 60% employees were covered through trainings of different kinds. For women the figure is 75%.</p> <p>ii. Skill building programs have been conducted targeting the business role requirement through Boot Camps, Role based Induction programs, Product trainings and Process trainings.</p> <p>iii. Compliance & Mandatory trainings such as Gender Sensitivity Workshops, NIIT Code of Conduct and GDPR [General Data Protection Framework], sessions have been carried out across the organization for all types of employees. These sessions are also conducted during new employee induction programs.</p> <p>iv. Executive and managerial development programs for upgrading behavioural skills are also conducted. Coaching and career advancement programs are also implemented.</p> <p>v. An internal on-line learning portal is made available to all for self development and training, with rich learning content.</p> <p>vi. The safety training needs are identified for different personnel based on the physical environment. Accordingly, training – including awareness sessions, mock fire drills, classroom sessions and periodic demonstrations related to safety, security and well-being are provided to all employees.</p>			

Principle 4

1. Has the company mapped its internal and external stakeholders? Yes/No

Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.

2. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders?

The Company has mapped its internal and external stakeholders.

NIIT Limited is a responsible corporate citizen and is committed to being responsive to all its stakeholders including shareholders, customers, business associates, employees, vendors and suppliers, governments and society at large including communities that it operates in. These approaches are laid out in our Code of Conduct document on our website.

The Company considers that the communities around its facilities constitute one of its most important stakeholders. The Company actively hires without discrimination including disadvantaged, vulnerable and marginalized stakeholders. The Company in the recent past, has hired services of employees who have hearing disability/impairment and created proficiency in them for visual/graphics skills.

Principle 5

1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?
2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

The policy of the Company is applicable to the company only. Company does not deal with any supplier/contractor if it is in violation of human rights and do not

BUSINESS RESPONSIBILITY REPORT (Contd.)

employ any person below the age of eighteen as per the recruitment policy. Use of forced or compulsory labour is prohibited at all the units and the same is discouraged at our business associates.

No complaint was received pertaining to human rights violation during the past financial year

Principle 6

1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.
2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.
3. Does the company identify and assess potential environmental risks?Y/N
4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?
5. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.
6. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?
7. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.

NIIT Limited's environment control policy and quality policy does not extend to its subsidiaries, JV and suppliers/contractors.

The Company is addressing the critical area of climate change mitigation through several initiatives. These include continuous improvement in energy efficiency, adopting the sources of renewable energy, integrating green attributes into the operating environment, maximizing water use efficiencies and rain water harvesting, maximizing collection, segregation, recycling and safe disposal under solid waste management drive.

The Company regularly identifies the potential environmental risks by complying to the Environment Management System - ISO 14000, at its largest facility used by maximum number of employees. The steps taken to identify potential risks helps determine any significant risks. Management plan is then made and executed in time in order to eliminate/ mitigate such risks.

During the year NIIT Limited continued to implement the sustainability initiatives including renewable energy, as already explained earlier in this document.

Yes, the emissions and waste generated by the Company are within the permissible limits of the Pollution Control Board.

There have been no show cause notices or other legal notices received from either the central or state pollution control board during the year under review.

Principle 7 (Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner)

1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business dealswith:
2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes, specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles,Others)

NIIT Limited is an active member of the following Industry bodies -

- (a) CII.
- (b) PHDCCI.
- (c) NASSCOM.
- (d) FICCI.

Senior officials of the Company have played active roles in these associations to help the industry and Government in the areas of higher education, skills training and technology adoption.

Principle 8 (Businesses should support inclusive growth and equitable development)

1. Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes, details thereof.
2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?
3. Have you done any impact assessment of your initiative?
4. What is your company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken.
5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community?

The Company supports equitable growth and development through:

- a. Reaching the underserved communities for computer familiarization, suitable to them.
- b. Teaching IT skills to rural and semi-urban population to help create livelihoods.

The Company provides subsidized intellectual property rights access and certified course material to a not-for-profit NGO – NIIT Foundation who reaches our directly and through a network of over 150 NGOs to independently conduct these programs mainly funded

BUSINESS RESPONSIBILITY REPORT (Contd.)

by CSR funds of different corporate entities. Last year, NIIT Foundation has impacted 700,000 children, youth and adults through their 180 skills training centres, 280 hole-in-the-wall learning stations, online training platforms and 400 NGO partner training centres.

Principle 9 (Businesses should engage with and provide value to their customers and consumers in a responsible manner)

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.
2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)
3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year.
4. Did your company carry out any consumer survey/ consumer satisfaction trends?

As on March 31, 2019, there were forty pending consumer complaints. A total of 9 new consumer complaints were received, while 11 complaints were disposed during the year 2019-20, resulting in 38 pending as March 31, 2020.

Case pertaining to unfair trade practices complaints: One 'Information' was filed against the Company in 2017 before the Competition Commission of India [CCI], which was dismissed by CCI in the same year. Complainant's writ petition against the order of CCI in Hyderabad High Court was dismissed in 2018; the subsequent writ appeal by complainant was also dismissed in the same year. This Complainant appealed against the CCI's order in NCLAT in 2019-20, was dismissed in May 2020. The Complainant has filed second appeal before Supreme Court in August 2020, which is yet to be heard.

NIIT strongly believes in Customer Feedback and make necessary changes in the Products, Processes and Policies for improving Customer Satisfaction. NIIT conducts quarterly surveys to assess the customer satisfaction levels and Net Promoter Score. This survey is conducted nation wide among all the learners, and is conducted Online. For the year 2019-20, the Net Promoter Score of our Career Education Business in India is 62.