

DRAFT CSR POLICY

As Mahatma Gandhi quoted “*Be the change you wish to see in the world.*” At Springer Nature, we believe in this and we know that we can only be a truly sustainable business by ensuring we are responsible in our use of resources and by creating a culture based on trust and respect. Our aim is to have a positive impact in every area of our work. Following this spirit, we have formulated the CSR Policy encompassing the group’s philosophy of doing responsible business.

Applicability

Macmillan’s CSR Policy has been developed in accordance with the provisions of Section 135 of the Companies Act, 2013 read with CSR rules notified by Ministry of Corporate Affairs, Government of India. The Policy shall apply to all CSR Projects/programmes undertaken by Macmillan (“Company”) as per Schedule VII of the Act and as amended from time to time.

CSR Program areas

The Company shall undertake CSR activities as recommended by the CSR Committee and in accordance with the CSR Regulations, in particular Schedule VII of the Act and the directions and clarifications issued by the Ministry of Corporate Affairs from time to time in this regard.

The Company will focus on the following core areas:

- a. Eradicating hunger and poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
- b. Promoting education; including special education and employment enhancing vocation skills especially among children, woman, elderly and the differently abled and livelihood enhancement projects
- c. 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.
- d. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining of quality of soil, air and water.

CSR Committee

In due compliance of the Act, the Company has constituted a Corporate Social Responsibility (CSR) Committee of the Board consisting of three directors. The CSR Committee shall inter-alia be responsible for the following:

- Formulating and recommending the CSR Policy of the Company and any amendments thereof to the Board;

- Recommending the amount of expenditure to be incurred on each of the activities to be undertaken annually as per the CSR Policy;
- Implementation and monitoring of CSR projects or activities of the Company by following a defined monitoring process for the same. The CSR Committee shall meet as and when deemed necessary.
- The CSR Committee may invite Senior Management Employee, Executives, Advisors and such other person (s) as it may consider necessary to attend the meeting.

CSR Budget

- The Board shall endeavor that the Company spends, in every financial year, at least 2% of its average net profit made during the immediate three preceding financial years.
- Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be utilized only for CSR purposes.
- The Company may collaborate or pool resources with group companies, other organizations or companies to undertake CSR activities in such a manner that the respective companies are in a position to report separately on such projects or programmes in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time.

Implementation:

- a. The CSR Committee under the guidance of the Board of Directors will drive the implementation of the Projects finalized for execution. The modalities for execution of the specific project will be decided by the CSR Committee.
- b. To ensure smooth implementation and to have a wider impact of the projects, the Committee may enter into partnerships with government/third parties/Non – government organizations (NGO's) etc.
- c. The time period/duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program.

Monitoring and evaluation

The CSR Committee will provide regular progress report to the Board. This report would indicate:

1. Achievement since last progress report / during the last quarter in terms of coverage compared to the target and reasons for variance.
2. Achievement of the year-to-date in terms of coverage compared to the target, plans to overcome shortfalls if any and support required from the Board to overcome the shortfalls.
3. Actual year-to-date spends compared to the budget and reasons for variance.