

# BUSINESS RESPONSIBILITY REPORT

## SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

- Corporate Identity Number (CIN) of the Company: **L72900MH2000PLC123841**
- Name of the Company: **Aptech Limited**
- Registered address: **Aptech House, A-65, MIDC, Marol, Andheri (East) Mumbai 400093**
- Website: **www.aptech-worldwide.com**
- E-mail id: **info@aptech.ac.in; investors\_relations@aptech.ac.in; cs@aptech.ac.in**
- Financial Year reported: **1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022**
- Sector(s) that the Company is engaged in (industrial activity code-wise)
  - Other Educational Services n.e.c.- 85499**
  - Educational Support Services (Testing Evaluation Services-85500)**
- List three key products/services that the Company manufactures/provides (as in balance sheet)
  - Training and Education**
  - Assessment Solution**
- Total number of locations where business activity is undertaken by the Company
  - Number of International Locations: **The Company is present in 30+ countries globally through its franchise network. Major markets for the Company are SAARC, Vietnam, Nigeria, Qatar, Saudi Arabia, Egypt, and Kenya.**
  - Number of National Locations: **The Company operates from 1 Head Office, 2 Regional Offices and branch offices in most states of India across its group companies within India. It has a total of about 602 active learning centres, including 3 company-owned premises as of March 31, 2022, in India.**
- Markets served by the Company -**Global**

## SECTION B: FINANCIAL DETAILS OF THE COMPANY

- Paid up Capital (INR): **₹ 4,13,45,246/-**
- Total Turnover (INR): **₹ 22,610 Lakhs (Consolidated)**
- Total profit after taxes (INR): **₹ 4,944 Lakhs (Consolidated)**
- Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%): **2% of Average Net Profit of last three financial years**
- List of activities in which expenditure in 4 above has been incurred: **Education & All-round Development of Children**

## SECTION C: OTHER DETAILS

- Does the Company have any Subsidiary Company/Companies?: **Yes**
- Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s): **Yes. MEL Training & Assessments Limited**
- Do any other entity/entities (e.g., suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company?: **No.**

## SECTION D: BR INFORMATION

- Details of Director/Directors responsible for BR
  - Details of the Director/Director responsible for implementation of the BR policy/policies
    - DIN Number: **07565631**
    - Name: **Anil Pant**
    - Designation: **Managing Director & CEO**
  - Details of the BR head: **Not Applicable**
- Principle-wise (as per NVGs) BR Policy/policies
  - Details of compliance (Reply in Y/N)

No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
1	Do you have a policy or policies for...	Y	Y	Y	Y	Y	N	Y	Y	Y
2	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y		Y	Y	Y
3	Does the policy conform to any national / international standards? *	Y	Y	Y	Y	Y		Y	Y	Y
4	Has the policy been approved by the Board? If yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director? **	Y	N	Y	Y	Y		Y	Y	N
5	Does the company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy? ***	Y	N	Y	Y	Y		Y	Y	N
6	Indicate the link for the policy to be viewed online? ****									
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	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

No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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
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

**\*The Whistle Blower Policy, Code of Conduct, Prevention of Sexual Harassment Policy and Corporate Social Responsibility Policy are framed as per the requirements of the respective legislations of India.**

**\*\*Where applicable**

**\*\*\*The Whistle Blower Policy and Code of Conduct are overseen by the Audit Committee of the Board of Directors of the Company and Corporate Social Responsibility Policy is overseen by the Corporate Social Responsibility Committee of the Board of Directors of the Company. Prevention of Sexual Harassment Policy is being overseen by Internal Complaints Committee (ICC) constituted under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The grievance, if any, arising out of Whistle Blower Policy, Code of Conduct and Prevention of Sexual Harassment Policy is being redressed by the respective committees which oversee them.**

**\*\*\*\*Weblink of policies below**

Principle	Applicable policy	Weblink of Policy
Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.	Vigil Mechanism/ Whistle Blower Policy Code of Practices and Procedures for Fair Disclosures to the next line.	www.aptech-worldwide.com
Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.	Content Development Lifecycle – process documentation Manuals for Learning Centre Operations Standard Operating Procedures for Centre-based and Internet-based Exams	www.aptalk.in (Accessible only to employees)
Principle 3: Businesses should promote the wellbeing of all employees.	Code of Conduct Prevention of Sexual Harassment Policy	www.aptech-worldwide.com
Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised.	Corporate Social Responsibility Policy Dividend Distribution Policy Risk Management Policy	www.aptech-worldwide.com
Principle 5: Businesses should respect and promote human rights.	Code of Conduct	www.aptech-worldwide.com
Principle 6: Businesses should respect, protect, and make efforts to restore the environment	-	-
Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner	Code of Conduct Vigil Mechanism/ Whistle Blower Policy	www.aptech-worldwide.com
Principle 8: Businesses should support inclusive growth and equitable development	Corporate Social Responsibility Policy	www.aptech-worldwide.com
Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner.	Manuals for Learning Centre Operations Customer Care – process documentation	www.aptalk.in (Accessible only to employees)

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

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									
2	The company is not at a stage where 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 6months									
5	It is planned to be done within the next 1 year									
6	Any other reason (please specify)						Note			

\* Note: The Company is not in a resource or energy intensive industry.

## 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 BR initiatives of the Company are intimately interwoven with the operations of the Company and are incorporated into the strategic direction mandated by the Board of Directors. As the person leading and steering the Company on a day-to-day basis in line with the strategic direction, the MD and CEO regularly conducts reviews that cover the BR performance parameters.

- (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 has published the BR Reports as a part of its Annual Reports from the Financial Year 2020-21, which are uploaded on its website at [https://www.aptech-worldwide.com/pages/investor-relations/investorrelations\\_financials.aspx](https://www.aptech-worldwide.com/pages/investor-relations/investorrelations_financials.aspx).

to digital platforms. However, as the restrictions have eased, the Company has shifted to a Hybrid model, which would continue to be more resource efficient than the completely offline processes in the pre-pandemic avatar. The intensity of travel is also much lower than the pre-pandemic times due to video-conferencing tools adopted by the Company.

- For its B2B services of Assessment & Testing, the Company offers solutions that help customers minimize environmentally intensive resource utilization, especially paper. They are also more efficient in terms of time utilization and also reduce the cost of logistics.
- The Company recycles all types of waste that are generated at its offices. This includes paper, refuse, and e-waste. The Company practices segregation of dry and wet waste as per the local municipal guidelines and works with vendors to responsibly dispose the e-waste or if in usable condition donates them to institutions working with under-privileged sections of the society.

## SECTION E: PRINCIPLE-WISE PERFORMANCE

## Principle 1: ETHICS, TRANSPARENCY AND ACCOUNTABILITY

- Policy/s related to ethics, bribery and corruption and their coverage
- Stakeholder complaints related to ethics, bribery, and corruption during the reporting financial year

In line with the best Corporate Ethics and Responsibilities, the Company has formulated and implemented policies relevant to this Principle, viz. the Code of Conduct and the Vigil Mechanism/ Whistle Blower Policy. These policies cover the Company, its subsidiaries and all permanent and on-contract employees of the Company and its subsidiaries. Zero stakeholder complaints were received in the past financial year related to ethics, bribery, and corruption.

## Principle 2: SAFETY AND SUSTAINABILITY

- Products or services whose design incorporates social or environmental concerns, risks and/or opportunities.
- Procedures and extent of sustainable sourcing (including transportation)
- Steps to procure goods and services from local and small producers
- Capacity and capability development of local and small vendors
- Recycling of products and waste

The Company's services are not resource intensive and address the key social factor of employability. Despite not being resource intensive, the Company has incorporated elements of sustainability and social upliftment in the delivery of its services.

- The Company's adoption of the business partner/franchise model helps develop an ecosystem of local entrepreneurs who benefit from the Company's brand, know-how and established systems while transforming the lives of students through their insight into the local needs and access.
- The course material for the training programs of the Company is not printed on paper but delivered digitally.
- Due to the pandemic, the Company also shifted all its processes across the entire student lifecycle to the

## Principle 3: EMPLOYEE WELLBEING

	Employee Data	As on 31 <sup>st</sup> March, 2022
1	Total number of employees	<b>Permanent: 458</b>
2	Total number of employees hired on temporary/contractual/casual basis	<b>Contractual: 7</b>
3	Number of permanent women employees	<b>126</b>
4	Number of permanent employees with disabilities	<b>0</b>

Employee Association:

**The Company does not have an employee association that is recognized by the management.**

Status of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the reporting financial year:

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	<b>NA</b>	<b>NA</b>
2	Sexual harassment	<b>NA</b>	<b>NA</b>
3	Discriminatory employment	<b>NA</b>	<b>NA</b>

Percentage of employees given safety and skill up-gradation training in the reporting financial year:

**No training programs conducted due to COVID-19 related lockdowns**

- (a) Permanent Employees: Nil
- (b) Permanent Women Employees: Nil
- (c) Casual/Temporary/Contractual Employees: Nil
- (d) Employees with Disabilities: Nil

#### Principle 4: STAKEHOLDER WELFARE

- Internal and external stakeholders
- Identification of the disadvantaged, vulnerable & marginalized stakeholders
- Special initiatives by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders

The Company always has the benefits of its stakeholders in mind. It has identified students, recruiters, business franchise partners (and suppliers), employees and shareholders as its key stakeholders. As a guiding principle for approving any initiative, the Company believes it should benefit at least two of its key stakeholders.

The Company has been instrumental in transforming the lives of many students across the globe by putting them on an accelerated career growth path. With most of its students coming from Lower or Lower Middle-Class sections, the financial and social impact of sustainable careers is transformative not only for the students but also for their families.

The Company's well-defined Corporate Social Responsibility Policy focuses on concrete objectives to support the local community where it operates. In alignment with its larger objective of bringing transformation into the society through Education, it has also focused its CSR activities in similar areas of Training and Child Development. It works with established NGO partners to cater to children, youth, and aged to address various needs. It also dabbles in some initiatives that promote awareness of the environmental issues.

The Company's endeavour and commitment towards its shareholders is encapsulated by formulating the Dividend Distribution Policy, Investor Communication Policy and Risk Management Policy

#### Principle 5: HUMAN RIGHTS PROTECTION

- Policy on human rights and its coverage
- Stakeholder complaints received in the past financial year and resolution

The Company's commitment to the protection and safeguarding of human rights is strong. It has implemented a Code of Conduct that all the employees, whether permanent or temporary, in addition to the vendor staff operating from its premises is expected to adhere to. It has not received any stakeholder complaints in the reporting financial year related to human rights infringements.

#### Principle 6: CONSERVATION AND RESTORATION OF ENVIRONMENT

- Policy on environment conservation and restoration and its coverage
- Strategies/ initiatives to address global environmental issues
- Identification and assessment of potential environmental risks
- Projects related to Clean Development Mechanism
- Any other initiatives on clean technology, energy efficiency, renewable energy, etc.
- Emissions/ Waste generated by the company
- Number of pending show cause/ legal notices from CPCB/SPCB which are pending as on end of Financial Year

The Company does not have a policy that covers Principle 6 as its business is neither material intensive, nor does it

have a significant negative effect on the environment. The nature and the size of its business are not conducive to any meaningful Clean Development Mechanism (CDM) project. However, the Company complies with the applicable CPCB/SPCB emissions/ waste limits and zero show cause/ legal notices were received from these bodies during the reported financial year.

#### Principle 7: POLICY ADVOCACY

- Memberships of any trade and chamber or association
- Advocacy / Lobbying through the chambers or associations for the furthering public good

The Company is a full-time member of the following industry bodies:

- Confederation of Indian Industries (CII)
- Associated Chambers of Commerce & Industry (ASSOCHAM)
- Federation of Indian Chambers of Commerce & Industry (FICCI)
- National Association of Software and Service Companies (NASSCOM)
- Bombay Chamber of Commerce & Industry (BCCI)

As a responsible corporate citizen, the Company participates based on its needs and capabilities in the collective activities and lobbying initiatives of these bodies that pertain to reform and needs of the Education and Training sector or general matters such as Corporate Governance, Sustainable and Inclusive Development, and other social issues.

#### Principle 8: EQUITABLE AND INCLUSIVE DEVELOPMENT

- Specified programmes/initiatives/projects in pursuit of equitable and inclusive development
  - Execution model (in-house team/own foundation/ external NGO/government structures/any other)
  - Impact assessment
- Company's direct contribution to community development projects (Amount in INR) and project details
- Steps to support adoption of community development initiative by the community

The Company has a Corporate Social Responsibility (CSR) Policy which derives its core values and covers various aspects as per requirements of the Companies Act, 2013. The Policy has also been developed considering the organization's vision, mission, and values. Its fundamentals are based on inputs from top management and all stakeholders. The programmes are undertaken either directly or through specialized agencies/NGOs and a structured impact assessment of all the initiatives is conducted. The Company has received positive feedback on its efforts from the community towards the education of children and youth, needs of the aged, and environment protection. RS. 10.79 lakhs were spent on CSR initiatives during the FY2021-22.

#### Principle 9: CUSTOMER ORIENTATION

- Percentage of customer complaints pending as on the end of financial year
- Consumer cases pending as on the end of financial year
- Display of product information on the product label, over and above what is mandated as per local laws
- Stakeholder cases 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

- Consumer survey/ Consumer satisfaction trends

**As of the end of the financial year, 2.5% of customer complaints received during the year are pending to be resolved. The Company has 23 pending cases in the consumer court as of 31<sup>st</sup> March 2022. The Company is committed to providing the best learning experience to its students and fulfilling the business needs of its institutional customers to the utmost level. It has process manuals and SOPs for its learning centres and delivery of Assessment & Testing services using various modes for its institutional customers.**

However, in the event of any issue, the students have access to multiple channels to register their issues/ problems/ complaints regarding the course/ centre/ support services to the Company. These include a dedicated email address, online form, and dedicated telephone number. The Company also responds to and resolves any complaints received on its social media pages. These complaints are handled based on a defined process flow and genuine complaints resolved to the satisfaction of the student. The institutional customers

**of the Company have access to the delivery and relationship team to register their complaints and are aware of a defined escalation matrix in case they are not satisfied with the first level response.**

The customers are required to fill up a customer satisfaction survey form on completion of the training program/ assessment project to give their feedback, which is collated and monitored regularly. The feedback is used to take specific corrective action related to the individual customer/ case, if necessary, OR make process/ systemic changes for the general feedback. The Company has not carried out any third-party survey of consumers.

The Company adheres to the applicable guidelines in the Code Book of The Advertising Standards Council of India (ASCI) in its marketing communication. The Company does not have any case filed against it regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as of the end of the financial year.