

# NIIT LEARNING SYSTEMS LIMITED

## **Public Advocacy Policy**

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# NIIT LEARNING SYSTEMS LIMITED

## Public Advocacy Policy

### 1. Purpose and Background

NIIT Learning Systems Limited (NLSL), a global leader in providing Managed Training Services, and skills & talent development to global corporations, is committed to shaping the future of education and technology. NLSL engages in public advocacy to foster a conducive regulatory environment, with entities in the NIIT group being members of apex industry bodies like NASSCOM, CII, FICCI, PHDCCI, TSIA, AIMA AND LPI. This policy outlines our ethical framework for participating in such democratic processes, ensuring all engagements reflect our core values of integrity, transparency, and substantial societal benefit.

### 2. Scope of the Policy

This policy applies to all directors, officers, and employees of NLSL. In this context, "Advocacy" refers to the organized effort to influence public policy, legislative actions, or regulatory decisions. It involves sharing NLSL's technical wisdom with government bodies, industry associations and community to benefit the broader sector and mankind, as and where appropriate.

### 3. Guiding Principles

Our advocacy efforts are an extension of the NIIT Vision and are guided by these foundational beliefs:

- **Substantial Societal Benefit:** We ensure that in any association with society, the community benefits substantially more than what it gives to us.
- **Pioneering Leadership:** We seek to play a key role in the direction and deployment of technology and know-how for the benefit of mankind.
- **Integrity and Ethics:** We will be fair in all our dealings and promote high standards of business ethics, ensuring all representations are based on factual data.
- **Absolute Commitment:** We will meet every commitment made to society, irrespective of the cost that may be incurred.
- **Neutrality:** NLSL maintains a strictly non-partisan stance and does not contribute funds to political parties or candidates.

### 4. Promotion of Sustainable Practices and Well-being

NLSL believes that organizational growth is a derivative of the growth of each individual inside the company. Aligning with this thought, our advocacy shall prioritize:

- **Sustainable Development:** Supporting policies that ensure long-term growth and financial stability while remaining a "good corporate citizen".
- **Community Opportunity:** Advocating for regulations that create opportunities for learning, thinking, and innovation for all members of society.

## 5. Governance Framework

To ensure accountability and alignment with our mission, the following structure governs our advocacy:

Entity	Responsibility
<b>The Board of Directors</b>	Oversees strategic alignment of advocacy with the corporate mission and values.
<b>Head Communications Officer</b>	Acts as the primary point of contact for official policy statements.
<b>Legal &amp; Compliance Team</b>	Ensures all submissions comply with the requirements of Companies Act, SEBI, IT Act, other relevant statutory needs and NIIT Code of Conduct.
<b>Internal Subject Matter Experts</b>	Provide technical data for policy papers on AI ethics, labor codes, ESG pedagogy and the like.

## 6. Guidelines for Participation and Conduct

- **Authorized Spokespersons:** Only designated senior executives are authorized to represent NLSL's official position at industry forums, media, investor or government meetings.
- **Social Media Usage:** Employees must ensure that any personal use of social media regarding public policy is in strict alignment with the NLSL Code of Conduct. Personal views must be clearly identified as such and must never misrepresent the company's data, intent and information.
- **Conflict of Interest:** No employee shall engage in advocacy that benefits personal or third-party interests at the expense of the organization.

## 7. Prohibited Activities

NLSL maintains a zero-tolerance policy toward:

- **Bribery and Influence:** Offering any gratification to government officials to secure business advantages.
- **Misrepresentation:** Providing false or misleading data to regulatory bodies.
- **Anti-Competitive Behavior:** Using advocacy to unfairly restrict competition.

## 8. Monitoring and Disclosure

This Policy shall be updated/ amended with the approval of the Board of Directors.

This policy shall be placed on the website of the Company.