

Donations Policy

Navitas Limited
ACN 109 613 309

Document

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Responsibility	Group Manager Public and Investor Relations
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23 June 2006	Initial document - Donations and Activities Policy	June 2010
29 April 2014	Amended to Donations Policy	29 April 2016

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PURPOSE AND SCOPE

Navitas' Corporate Responsibility strategy aims to show respect and commitment by celebrating, valuing and caring for people, our communities and the environment.

In 2013 Navitas established the Navitas Education Trust (NET) as its main vehicle for supporting significant education focused philanthropic partnerships and projects with registered charities.

Navitas intends to concentrate the bulk of its philanthropic activities under the NET, where greater resources can be more effectively focused on a small number of projects, with this policy providing guidance on broader donation activity.

This policy also provides guidelines on political donations and private research.

This policy applies to all Navitas employees.

POLICY

1. Navitas donations

1.2 In accordance with Navitas' Corporate Responsibility principles all donations and sponsorships should strive to be:

1.2.1 Aligned with Navitas strategy and business objectives;

1.2.2 Aligned to Navitas values, vision and mission;

1.2.3 Be evidence based and measurable;

1.2.4 Deliver benefits to our people, customers, communities or the environment; and

1.2.5 Be ethical and committed to quality.

1.3 In addition all Navitas donations should be related to education or have a broad education focus.

1.4 Unless approved by the Group CEO Navitas will not provide support to:

1.4.1 Activities that may be considered divisive in the community; and

1.4.2 Applications from religious organisations for religious purposes.

2. Disaster fundraising support

2.1 Following significant regional or national disasters in any country, Navitas may decide to support fundraising initiatives led by staff or students. This involves supporting fundraising activities via use of facilities and Navitas resources, not making cash donations at a Business Unit level.

2.2 At a corporate level a decision to support any fundraising must be made by the Group CEO.

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- 2.3 At a Divisional level the decision must be made by the CEO of that Division.
- 2.4 At a business unit level the decision can be made by the Head of Business unit with approval from the Divisional CEO or Executive General Manager of that region.

3. Corporate matching of donations

- 3.1 Following significant regional or national disasters Navitas may decide to match any funds raised or donated by staff, and or funds raised by students and staff at Navitas business units, to registered charities. Corporate matching of donations can only be instigated at a Group level and must be approved by the Group CEO. The procedure for communicating and organising corporate matching is detailed below.

4. Other Donations

4.1 Donations to Universities or key stakeholder institutions

Donations to partner universities or key stakeholder institutions in furtherance of research into areas of interest to the Company may be considered by the Group CEO, relevant CEO of each Division, the Group Manager Public and Investor Relations and the Group General Manager Government and Stakeholder relations on a case by case basis. Information regarding all donations must be provided to the Group Manager Public and Investor Relations for collation and reporting.

4.2 Private Research on Public Policy Issues

The Company may fund privately conducted research projects or business studies that are beneficial to the Company and are in the public domain. Such funding may be undertaken in appropriate cases even if the project or study involves public policy issues (but is unrelated to benefits to any political organisation or politician). The granting of such funding will be at the discretion of the Group CEO.

4.3 Political Donations

- 4.4 Navitas prepares for legislative and regulatory reforms through direct engagement with political parties. While our policy is to not make outright cash donations to political parties; we do permit attendance as business observers at political conferences and functions which may require an admission fee. Any such attendance must be approved by the Group CEO or CEO of that division. Navitas adheres to all relevant political disclosure laws and regulations.

4.5 Scholarships

Please see the policy "Navitas Scholarships, Bursary and Incentive Scheme" for further information on scholarships, bursaries and agent incentives.

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RESPONSIBILITIES

Divisional Chief Executive Officers are responsible for reviewing Divisional requests for donations and fundraising and approving where appropriate.

Executive General Managers are responsible for reviewing regional requests for disaster fundraising and approving where appropriate.

Group Chief Executive Officer is responsible for reviewing requests for disaster donations, fundraising and corporate donation matching and approving where appropriate.

Group General Manager Government and Stakeholder Relations is responsible for considering donations to partner universities or key stakeholder institutions in furtherance of research into areas of interest to the Company as appropriate.

Group Manager Public and Investor Relations is responsible for considering donations to partner universities or key stakeholder institutions in furtherance of research into areas of interest to the Company as appropriate as well as supporting the corporate donation matching process as per the procedure below and collating donation information for annual reporting.

HBUs are responsible for ensuring that all employees are aware of this Policy and their responsibilities defined herein.

Navitas employees are responsible for being aware of, and complying with this Policy.

CORPORATE DONATION MATCHING PROCEDURE

The procedure for managing corporate donation matching is as follows:

Step	Who	Notes
Upon the occurrence of any significant regional or national disaster any staff member can request that Navitas match donations made by staff and students to registered charities in regards to that disaster.	Any Navitas member of staff.	Staff must email cr@navitas.com with their request which will subsequently be reviewed and potentially escalated to the Group CEO.
If the Group CEO approves the request an email will be sent to all staff outlining the situation, timeframes and other information such as which charity the Navitas matched donation will be sent to.	Group CEO and Group Manager Public and Investor Relations.	

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All donations must be made to registered charities by a determined deadline. Receipts must be collected.	All staff.	
Staff must submit a copy of their receipts to a designated finance team member in their Business Unit, Division or area. Finance team members must then collate that information and provide it to a nominated person within Group Finance.	Finance team members.	Finance team members must also collate information such as employee name, business unit and amount of donation.
Group Finance will collate all the information and provide a final figure to the Group CEO.	Group Finance.	
A donation to the nominated registered charity will then be made and the results communicated to all staff.	Group CEO, Group Finance and Group Manager Public and Investor Relations.	

DEFINITIONS

Unless the contrary intention is expressed in this Policy, the following words (when used in this policy) have the meaning set out below:

Group CEO – Group Chief Executive Officer.

Company – means Navitas Limited ACN 109 613 309 having its registered office at Level 2, Kirin Centre, 15 Ogilvie Road, Mt Pleasant WA 6153.

Donation – something that is given to a charity, in the case of this policy this refers to financial donations.

Division – means Navitas' three operating Divisions, namely University Programs, SAE and Professional and English Programs.

Group – means the Company and its subsidiaries.

BU – means a subsidiary or business of Navitas.

Political party – a political organisation that typically seeks to influence, or entirely control, government policy.

Registered charity – an organisation registered with an appropriate national regulator to be recognised as a charity.

Scholarship - a grant or payment made to support a student's education.

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REVIEW

This Policy is reviewed every two years by the Group Manager Public and Investor Relations to ensure alignment to appropriate strategic direction and its continued relevance to Navitas' current and planned operations.

RELATED DOCUMENTS

Supporting policy and documents include:

- CG-05-02D Procedures governing the delegation of authority and authority limits
- CG-03-01P Code of Conduct - The Company's Obligation to Stakeholders
- MKT-01-02P Navitas Scholarships, Bursary and Incentive Scheme