CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY
HERITAGE AVIATION PRIVATE LIMITED
CIN: U62200DL2011PTC212549
Effective Date: 01/4/2021
Version: 1.0

1. PREAMBLE

HERITAGE AVIATION PRIVATE LIMITED ("Company") recognises its responsibility towards society and the environment in which it operates. The Company is committed to conducting its business in a responsible and sustainable manner and contributing towards social, environmental and community development.

This Corporate Social Responsibility ("CSR") Policy has been formulated in accordance with Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

2. OBJECTIVE

The objective of this Policy is to establish the framework for identifying, undertaking, implementing, monitoring and reporting CSR activities undertaken by the Company.

The Company shall endeavour to undertake CSR activities that create a positive and sustainable impact on society and are in accordance with the activities specified under Schedule VII of the Companies Act, 2013.

3. CSR ACTIVITIES

Subject to the applicability of CSR provisions and the CSR expenditure required to be incurred by the Company, the Company may undertake CSR activities falling within the areas specified under Schedule VII of the Companies Act, 2013, as amended from time to time.

The areas may include, inter alia:

- Eradicating hunger, poverty and malnutrition and promoting health care and sanitation;
- Promoting education, vocational skills and livelihood enhancement;
- Promoting gender equality and empowerment of women;
- Ensuring environmental sustainability and ecological balance;
- Protection of national heritage, art and culture;
- Measures for the benefit of armed forces veterans and their dependents;
- Promotion of rural development and other activities specified under Schedule VII;
- Any other activity falling within the scope of Schedule VII of the Companies Act, 2013.

The specific CSR projects/programmes to be undertaken shall be identified and approved by the Board of Directors from time to time in accordance with applicable law.

4. IMPLEMENTATION OF CSR ACTIVITIES

The Company may undertake CSR activities:

a. directly; or

b. through eligible implementing agencies/organisations, as permitted under applicable law; or

c. in collaboration with other entities, where permitted under applicable law.

The manner and modalities of implementation shall be determined by the Board of Directors based on the nature and requirements of the CSR project.

5. CSR COMMITTEE

Where required under the provisions of Section 135 of the Companies Act, 2013, the Company shall constitute a CSR Committee in accordance with the applicable provisions.

The composition of the CSR Committee shall be disclosed on the Company's website and in the Board's Report, as applicable.

Where constitution of a CSR Committee is not mandatory under applicable law, the functions relating to CSR may be discharged by the Board of Directors in accordance with the provisions of the Companies Act, 2013.

6. CSR BUDGET AND EXPENDITURE

The Company shall endeavour to spend the prescribed CSR amount in accordance with Section 135 of the Companies Act, 2013 and the applicable CSR Rules.

The CSR expenditure shall be utilised only for activities/projects falling within the scope of Schedule VII of the Companies Act, 2013.

Any surplus arising out of CSR activities shall not form part of the business profits of the Company and shall be dealt with in accordance with the applicable provisions of the Companies Act, 2013 and the CSR Rules.

7. IDENTIFICATION AND APPROVAL OF PROJECTS

CSR projects and programmes shall be identified based on the needs of the community and the Company's CSR objectives.

The Board of Directors shall approve the CSR projects/programmes to be undertaken by the Company in accordance with the applicable provisions of the Companies Act, 2013.

The Company shall endeavour to give preference to the local areas and areas around which it operates, wherever appropriate and subject to the requirements of applicable law.

8. MONITORING AND REVIEW

The Company shall establish an appropriate mechanism for monitoring the implementation and progress of CSR projects.

The Board of Directors shall periodically review the status of CSR activities, utilisation of CSR funds and achievement of the objectives of the approved CSR projects.
The Company may obtain appropriate reports, utilisation certificates, supporting documents and other information from implementing agencies, wherever applicable.

9. CSR REPORTING AND DISCLOSURE

The Company shall make such disclosures relating to CSR as may be required under the Companies Act, 2013 and the rules made thereunder.
The Company shall disclose on its website, if any, the CSR Policy, the composition of the CSR Committee, where applicable, and the CSR projects approved by the Board, in accordance with applicable law.
The Company shall also make the required CSR disclosures in its Board's Report and other statutory filings, wherever applicable.

10. GENERAL

This Policy shall be interpreted and implemented in accordance with the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014, Schedule VII of the Act and other applicable laws, rules and regulations, as amended from time to time.
In case of any conflict between this Policy and the provisions of applicable law, the provisions of applicable law shall prevail.
The Board of Directors may amend, modify or revise this Policy from time to time in accordance with applicable law.

For HERITAGE AVIATION PRIVATE LIMITED

Name: Rohit Mathur
Designation: Director
DIN: 03371693