



PROPERTY VENTURES (INDIA) PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

"No one has ever become poor by giving"
Anne Frank

"To Serve Mankind is to serve God"

This policy has been instituted based on the Corporate Social Responsibility (CSR) philosophy of M/s Property Ventures (India) Private Limited and provisions of Section 135 of the Companies Act, 2013 ("the Act"), read with Schedule VII of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2013. This policy will at all times be subject to the provisions of the aforesaid act and rules (as amended from time to time).

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PREAMBLE

According to Section 135 of the Companies Act, 2013 (the Act) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 every company having net worth of Rupees Five Hundred Crore or more or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during immediate preceding three financial years is required to constitute a Corporate Social Responsibility Committee of the Board of Directors.

In compliance of the above requirements, Property Ventures (India) Private Limited ("company") has constituted Corporate Social Responsibility (CSR) Committee.

We, at Property Ventures (India) Private Limited do not view CSR as a responsibility but rather consider as duty being a responsible corporate citizen.

CSR ACTIVITIES

The Company may undertake such Activities as reproduced herein below for its CSR requirements; however, the activities being undertaken by the Company in its normal course of business shall not be taken into consideration for the said purpose:

- (i) Eradicating hunger, poverty arid malnutrition, promoting health care including preventive health care" and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- (ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- (iii) 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.
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water [including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].
- (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents [Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows] ;

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(vii) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports

(viii) contribution to the prime minister's national relief fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

(ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (S

(x) rural development projects

(xi) slum area development.

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

(xii) disaster management, including relief, rehabilitation, and reconstruction activities

(xiii) such other activities as may be prescribed under Schedule VII of the Companies Act, 2013

The Activities may be undertaken by the implementation Agency or the Company directly provided that such projects / programmes are in line with the activities enumerated in Schedule VII of the Companies Act, 2013.

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PRINCIPLE FOR SELECTION OF CSR ACTIVITIES

The CSR Committee, while formulating the Annual Action Plan and recommending to the Board, will accord priority to projects in the specific areas of the Company as mentioned above. The CSR activities specified under this Policy would be undertaken only in India and the preference shall be given to the local area and/or areas in the vicinity, where the Company operates, for spending the amount earmarked for CSR activities.

CSR COMMITTEE

The Board of Directors of the Company shall constitute a committee called the "Corporate Social Responsibility Committee" ("CSR Committee") in accordance with the provisions of Companies Act, 2013 and rules made thereunder. The CSR Committee will consist of 2 or more directors or such other number of directors as the Board of Directors of the Company may determine from time to time. The Board of Directors may change the composition of the CSR Committee from time to time in such manner as it thinks fit. Subject to provisions of Companies Act, 2013 and rules made thereunder, the CSR Committee may meet at such intervals, in such manner and may carry out matters in such manner and function generally as per such guidelines as it deems fit.

The terms of reference of the CSR committee shall be as per the applicable provisions of the Companies Act, 2013, as may be amended from time to time, including such functions as may be entrusted by the Board of Directors from time to time.

UNDERTAKING CSR ACTIVITIES

The CSR activities of the Company may be undertaken directly by the Company or through the followings eligible entities:

- 1..A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 established by the company, either singly or along with any other company, or
2. A company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
3. Any entity established under an Act of Parliament or a State legislature; or
4. A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

CSR BUDGET

For undertaking the CSR activities, the Company will strive to spend in each financial year a minimum of 2% of the average net profits of the previous three financial years. For this purpose, the net profit and average net profit shall be calculated in accordance with the

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provisions of the section 198 of the Companies Act, 2013 read-with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

IMPACT ASSESSMENT

If the Company is having average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.

If Company is undertaking impact assessment it may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed two per cent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.

FORMULATION OF ANNUAL ACTION PLAN

a) CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy.

b) The Annual Action Plan shall include the following:

- i. the list of CSR activities that are approved to be undertaken in the areas or subjects specified in Schedule VII of the Act;
- ii. the manner of execution of such projects or programmes as specified in Rule 4(1) of the Rules;
- iii. the modalities of utilization of funds and implementation schedules for the projects or programmes;
- iv. monitoring and reporting mechanism for the projects or programmes; and
- v. Details of need and impact assessment, if any, for the projects undertaken by the company.

c) The Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee based on the reasonable justification to that effect.

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However the duly modified plan shall be placed before the CSR Committee and Board at the end of the year for its noting.

MONITORING & REPORTING MECHANISM

The monitoring of CSR activities of the Company will be undertaken by the CSR Committee of the Company.

The CSR Committee shall discuss the progress of each project undertaken and make any decision with respect to the project which it thinks fit.

The Committee may require the Company / Implementation Agency to furnish such additional information or reports as it may require.

The members of the Committee may either on their own and through their delegated representatives make periodic visits to the CSR sites to ascertain the progress of the CSR Projects / Programmes.

An annual report of the activities undertaken under the CSR initiatives shall be prepared in the format as prescribed under the Companies (Corporate Social Responsibility Policy) Rules, 2014 which shall be included in the Board's Report of the Company,

Further, the Board shall specify reasons for not spending the allocated CSR budget of the relevant financial year in its report made under section 134 of the Act.

REVIEW/AMENDMENT OF POLICY

The CSR policy shall be subject to review/amendment by the Board at the instance of the CSR Committee. Any amendments in the Act or Rules or any applicable law including any clarifications/ circulars of relevant regulator, if mandatory, shall be read in conjunction with this Policy such that the Policy shall automatically reflect the contemporaneous applicable law at the time of its implementation.

INFORMATION DISSEMINATION

The Company's commitment towards Corporate Social Responsibility can be seen in brief on its website <https://skylightairways.com/>.

EFFECTIVE DATE

This policy is effective from 01.04.2014

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