

**CORPORATE SOCIAL RESPONSIBILITY (“CSR”) POLICY
OF
SKYROOT AEROSPACE PRIVATE LIMITED**

I. SHORT TITLE

This policy in relation to the Corporate Social Responsibility (“CSR”) of Skyroot Aerospace Private Limited (“the Company”) is titled as the “CSR Policy” and shall include any alterations, amendments or modifications hereto from time to time.

II. VISION STATEMENT, OBJECTIVE AND APPLICABILITY

- i. Our CSR Policy reflects our commitment to go beyond business and contribute to the welfare and development of society and the environment. It aligns with the Company’s vision and long-term social objectives, promoting sustainable development for future generations. The policy provides guidelines for implementing social welfare programs and initiatives, adopting short-, medium-, and long-term CSR strategies.
- ii. This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 (“Act”) and the rules issued thereunder.
- iii. Notwithstanding anything to the contrary contained in this CSR Policy but subject to applicable law, in the event that the Company fails to meet the thresholds set out under Section 135(1) of the Act for three consecutive financial years, it shall not be required to: (i) Constitute/maintain the CSR Committee; and (ii) Comply with the provisions of this CSR Policy till such time as it again meets the criteria specified in Section 135(1) of the Act.

III. DEFINITIONS:

- i. **“Act”** means Companies Act, 2013, as amended and modified from time to time.
- ii. **“Board”** means the Board of Directors or collective body of the Directors of the Company.
- iii. **“Company”** means SKYROOT AEROSPACE PRIVATE LIMITED.
- iv. **“Corporate Social Responsibility”** means and includes but is not limited to:
 - Projects or programs relating to activities specified in schedule VII of the Act; or
 - Projects or programs relating to activities undertaken by the Board in pursuance of the recommendation of the CSR Committee/ approved by the Board.
- v. **“CSR Activities”** means the activities listed in the CSR Policy and shall also include the activities as mentioned in schedule VII of the Act and the rules made thereunder which shall be funded by the Company.
- vi. **“CSR Policy”** means this Policy of SKYROOT AEROSPACE PRIVATE LIMITED.
- vii. **“CSR Rules”** means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended and modified from time to time.
- viii. **“CSR Committee”** means the Corporate Social Responsibility Committee constituted by the Board of Directors of the Company in accordance with Section 135 of the Act and the Companies (CSR Policy) Rules, 2014
- ix. **“CSR Expenditure”** means the amount recommended by the CSR Committee or Board to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.

Words and expressions used in the CSR Policy and not defined herein but defined under the Act shall have the same meanings respectively assigned to them.

IV. CSR COMMITTEE:

Pursuant to Section 135(1) of the Companies Act, 2013, the provisions relating to Corporate Social Responsibility have become applicable to the Company on account of the Company crossing the prescribed threshold of net worth. However, the requirement to constitute a CSR Committee is presently not applicable, as the Company has not met the profit-based eligibility criterion under Section 135(1) for the immediately preceding three financial years.

Accordingly, while this CSR Policy is being adopted to ensure compliance with the applicable provisions of the Act and the CSR Rules, the CSR Committee shall be constituted by the Company as and when the criteria for its constitution become applicable in accordance with the Act.

Responsibilities:

1. Formulate and recommend to the Board a CSR Policy.
2. Recommend CSR activities and the amount of expenditure to be incurred.
3. Monitor CSR activities from time to time.
4. Ensure compliance with the CSR provisions under the Act and applicable rules.

V. CSR ACTIVITIES:

Company shall undertake CSR activities for development of the society and the environment, particularly in the vicinity of the areas where the facilities of the Company are located.

The Company shall undertake such activities which are broadly related to any of the following:

- i. Eradicating hunger, poverty and 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;

- vii. training to promote rural sports, nationally recognised 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 (SDGs).
- x. rural development projects;
- xi. slum area development;
- xii. disaster management, including relief, rehabilitation and reconstruction activities.

VI. ANNUAL ACTION PLAN:

The Board, with the recommendation of CSR Committee, shall formulate an annual action plan which shall include the following:

- i. The list of CSR projects or programmes that are approved and to be undertaken by the Company.
- ii. The manner of execution of such projects or programmes.
- iii. The modalities of utilisation of funds and implementation schedules for the projects or programmes.
- iv. Monitoring and reporting mechanism for the projects or programmes.
- v. Details of need and impact assessment, if any, for the projects undertaken by the Company.

VII. CSR SPENDING:

The Company shall endeavour to achieve the objectives of CSR Policy and allocate every year:

- a. Minimum 2% of its average net profits made during the three immediately preceding financial years.
- b. Any income or surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the Company and the same shall be ploughed back for use in CSR activities.
- c. All the expenditure relating to CSR shall be pre-approved by the Board of Directors. Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

VIII. MODE OF IMPLEMENTATION:

CSR programs, projects or activities of the Company should be implemented through any of the following methods:

- i. Directly by the Company.
- ii. Through Implementing Agencies.
- iii. Any foundation or body incorporated by the Company and eligible to undertake such CSR projects.
- iv. In collaboration with other organizations/group companies

While the Company can engage suitable Implementing Agencies to undertake approved CSR projects. The Company can also partner with local governance bodies, such as Gram Panchayats, Civic Bodies, Municipality to directly undertake approved CSR projects with the help and support of these bodies.

IX. REVIEW AND MONITORING:

The Board along with CSR Committee shall be fully responsible for the monitoring and review of the implementation of the CSR Policy in accordance with applicable laws from time to time.
