

## **CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY OF FLYSBS AVIATION LIMITED**

This CSR Policy is formulated in compliance with Section 135 of the Companies Act, 2013, and the Companies (Corporate Social Responsibility Policy) Rules, 2014. This policy reflects its commitment to operating in a socially responsible and sustainable manner in alignment with legal mandates and stakeholder expectations.

### **1. Purpose & Objectives**

- To operate in a manner that is economically viable, socially equitable, and environmentally sustainable.
- CSR initiatives will focus on education, health and community wellbeing, environmental sustainability, and livelihood enhancement, aligned with Schedule VII of the Companies Act.

### **2. CSR Committee**

As per Section 135 of the Companies Act, 2013, a company is required to constitute a Corporate Social Responsibility (CSR) Committee if it satisfies any of the following thresholds during the immediately preceding financial year:

- Net worth of ₹500 crore or more, or
- Turnover of ₹1,000 crore or more, or
- Net profit of ₹5 crore or more.

However, in accordance with Rule 5(1) of the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, where the total CSR obligation of the company does not exceed ₹50 lakhs in a financial year, the constitution of a CSR Committee shall not be mandatory. In such cases, the functions of the CSR Committee shall be discharged by the Board of Directors.

Accordingly, FlySBS Aviation Limited shall constitute a CSR Committee only upon meeting the statutory threshold of CSR obligation exceeding ₹50 lakhs in a financial year. Until such time, all CSR responsibilities including policy formulation, implementation, budget allocation, monitoring, and reporting shall be governed directly by the Board of Directors in compliance with applicable laws and rules.

The CSR Committee shall comprise at least three directors, including at least one independent director.

The Board/Committee is responsible for formulating and recommending the CSR Policy to the Board, recommending annual budgets, monitoring implementation of CSR activities, and reporting outcomes.

### **3. Roles & Responsibilities**

- CSR Committee: Recommend CSR programs and budgets; monitor and evaluate performance.
- Board of Directors: Approve policy and budget; ensure compliance and disclosures.

#### **4. Scope of CSR Activities**

The Company will undertake CSR activities in the following areas:

- Education and skill development
- Healthcare and nutrition
- Environmental sustainability
- Women empowerment and rural development

All activities will align with Schedule VII of the Companies Act and be implemented either directly or through eligible implementing agencies.

#### **5. Implementation Framework**

The Company may implement CSR projects directly or through registered entities (Trusts, Societies, or Section 8 Companies) having valid PAN, 12A/80G certificates, and registered on MCA21 with Form CSR-1.

A structured monitoring mechanism will be utilized to ensure timely and impactful implementation as and when required.

#### **6. CSR Budget and Expenditure**

The Company may voluntarily allocate a percentage of its average net profit for CSR purposes. Any unspent amount will be disclosed in the Board's Report along with the reasons.

#### **7. Monitoring and Reporting**

The Board / CSR Committee will monitor project implementation on a yearly basis and ensure timely reporting.

Annual disclosures will be made in the Board's Report and on the company's website, as applicable.

#### **8. Policy Review**

This CSR Policy shall be reviewed annually or whenever necessary in light of legal or business developments.

Any revisions shall be approved by the Board of Directors.