

CORPORATE SOCIAL RESPONSIBILITY POLICY

HATSOFF HELICOPTER TRAINING PRIVATE LIMITED

Regd. Office:

Survey Nos. 3&4, Opp. ARDC Main Gate, HAL,

Vibhuthipura, Marathahalli Post,

Bengaluru, Karnataka - 560037.

CIN: U74999KA2008PTC044972

1. INTRODUCTION

The concept of Corporate Social Responsibility (“CSR”) has become a vital element of the modern world. The contemporary views of the corporate sector believe that the efforts of Government alone are not enough to get success in its endeavor to uplift the down trodden Society. The Government has introduced and enforced legislations which provide obligations and responsibilities of corporate sector in the areas of CSR. With the rapidly changing corporate and regulatory environment, advent of more functional autonomy, the Company has adopted CSR as a strategic tool for sustainable growth.

The Company believes in “looking beyond business” and strives to create a positive impact on the communities it serves and on the environment.

The Company is committed not just to profits, but also towards leaving a deeper imprint on the society as a whole.

2. POLICY OBJECTIVES

The objective of the policy is to actively contribute to the social, environmental and economic development of the society in which we operate.

3. SCOPE OF THE POLICY

This Policy shall apply to all CSR projects/programs/activities undertaken by the Company in India as per Schedule VII of the Companies Act, 2013 as amended from time to time.

4. DEFINITIONS

- i. “Act” shall mean the Companies Act 2013, including any modifications, amendments or re-enactment thereof.
- ii. “Board” shall mean the Board of Directors of the Company.
- iii. “CSR Annual Plan” shall mean the annual plan detailing the CSR expenditure for the year.
- iv. “CSR Committee” shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act.
- v. “CSR Policy” shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.
- vi. “CSR Projects” or “Projects” means Corporate Social Responsibility projects/ activities/ programs/ initiatives, instituted in India, either new or ongoing.
- vii. “Financial Year” shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.

- viii. "Net profit" shall mean the net profit as per the Act and Rules based on which the specific percentage for CSR expenditure has to be calculated.
- ix. "Rules" shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.

5. CSR COMMITTEE & ITS ROLE

Pursuant to the provision of Section 135 of the Companies Act, 2013, the Board of Directors of HATSOFF constituted a CSR Committee vide its Resolution dated 31.10.2017 The following are the members of the Committee:-

S. No.	Name of Director and Officer	Designation
1.	Mr. Harisha Bhat A	CAE Nominee Director
2.	Mr. Ravi Malhotra	HAL Nominee Director
3.	Mr. Vikas K Khurma	CAE Nominee Director
4.	Capt. N S Krishna	Chief Executive Officer
5.	Mr. T Jagadeesh	Chief Financial Officer
6.	Ms. Palak Goyal	Company Secretary

The roles of the CSR Committee are as follows:

- To recommend CSR activities as stated under Schedule VII (attached) of the Companies Act, 2013;
- To recommend the CSR Annual plan;
- To create transparent monitoring mechanism for implementation of CSR Initiatives in India;
- To submit Reports to the Board in respect of CSR activities undertaken by the Company;
- To monitor CSR Policy from time to time;
- To ensure that surplus arising out of CSR projects or programs or activities shall not form part of business profit of the Company.

6. FREQUENCY OF CSR COMMITTEE MEETINGS

The meetings of the Committee could be held at such periodic intervals as may be required.

7. QUORUM

Minimum three (3) Directors of the Company shall constitute a quorum for the Committee Meeting. Officers of the Company will also become part of the Committee.

8. CHAIRMAN

The members of the Committee present at the meeting shall choose one amongst them to act as Chairman of the Committee.

9. MINUTES OF THE COMMITTEE MEETING

Proceedings of all meetings must be minuted and signed by the Chairman of the Committee and tabled at the subsequent Board and Committee Meeting.

10. ROLE OF THE BOARD

- Ensure that CSR Committee is formed as per relevant provisions of the Act.
- Ensure that CSR Committee is functioning as per the defined roles.
- Ensure that recommendation for undertaking CSR activities has received from the CSR committee. The Board of the Company may decide to undertake its CSR activities approved by the CSR Committee,
- Ensure that the CSR activities undertaken by the Company are related to the activities included in Schedule VII of the Companies Act'13.
- Ensure that in each Financial Year the Company spends at least 2% of the average net profits of the company made during the three immediate preceding Financial Years.

11. CSR EXPENDITURE

The provisions of the Companies Act, 2013 read with rules made thereunder, mandate Companies meeting the qualification criteria to allocate certain portion of its annual net profits during the three immediately preceding financial years to be spent on CSR activities.

The CSR expenditure shall be recommended by the CSR Committee and subsequently to be approved by the Board of Directors. In case the Company fails to spend the projected amount on CSR activities, the Committee shall obtain from the Board of Directors of the Company, the reasons of such failure and record the same in its meeting.

12. REFLECTION OF CSR ACTIVITIES

Annual audit of all activities undertaken by the Company would be done by the Company's auditor, which would form a part of the Statutory Audit. The Annual Report of the Company shall include a section on CSR outlining the CSR Policy, CSR Committee, CSR initiatives undertaken by the Company, the CSR spend during the Financial Year and any other information as required by the prevailing law.

13. PUBLICATION OF THE CSR POLICY

As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website.

14. POLICY REVIEW AND FUTURE AMENDMENT

The Committee shall annually review its CSR Policy from time to time and make suitable changes as may be required and submit the same for approval of the Board.

15. EFFECTIVE DATE

This Policy is effective from the date of Board Approval i.e.31.10.2017.

SCHEDULE VII

Activities which may be included by companies in their Corporate Social Responsibility Policies
Activities relating to:—

(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, agro forestry, 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;

(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 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) Contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.

(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.