

**MENZIES AVIATION (BENGALURU) PRIVATE LIMITED**  
**CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)**

<b>Prepared By:</b>	Bharathi G Karthikeyan Company Secretary
<b>Approved By:</b>	Jayanth Venkoba Rao Chief Financial Officer
<b>Effective Date:</b>	19.08.2025

In conformity with requirements laid down under The Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as “the CSR Rules”) issued by the Ministry of Corporate Affairs (“MCA”), under Section 135 of the Companies Act, 2013 (“the 2013 Act”), (both together referred as “The CSR Provisions”), every company is required to spend at least 2% of the average net profits made during the three immediately preceding financial years when it meets any one or more of the below-specified threshold limits (as existing currently):

- Net worth of Rs. 500 crore or more
- Turnover of Rs. 1,000 crore or more
- Net profit (before taxes) of Rs. 5.00 crore or more.

**Menzies Aviation (Bengaluru) Private Limited** (“the Company”) is meeting the 3rd threshold limit as per the above provisions, based on the IND AS Audited Financials 31<sup>st</sup> March 2025, with effect from the financial year 2025-2026

**1. VISION:**

Menzies Aviation (Bengaluru) Private Limited (“the Company”) primarily recognizes that a Company, which develops the society within its reach and accordingly, take initiative to contribute towards welfare of various segments of society by undertaking socially, environmentally and economically useful programs for sustainable development of the community and society at large.

**2. SCOPE & COVERAGE**

The CSR activities of the Company shall include but not be limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 as

amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

### **3. CORPORATE SOCIAL RESPONSIBILITY (CSR) COMMITTEE:**

The Board oversees the implementation of our CSR Policy, in compliance with the requirements of Section 135 of the Act and the Rules made thereunder.

Composition of the CSR committee: The composition of the CSR Committee of the Board is as under.

<b>Sl. No.</b>	<b>Name</b>	<b>Role in the committee</b>
<b>1.</b>	<b>Mr. John Henderson</b>	<b>Member</b>
<b>2.</b>	<b>Mr. Bhaskar Anand Rao</b>	<b>Member</b>

The CSR committee constituted by the Company will be required to recommend the CSR projects to be undertaken by the Company only if the CSR liability exceeds the threshold limit of Rs. 50,00,000 (Rupees Fifty Lakh only) or any such amount as may be prescribed from time to time. If the CSR liability does not exceed the threshold limit (i.e., spending amount) of Rs. 50 Lakh, then the Board of Directors themselves will administer the duty of CSR committee.

The Corporate Social Responsibility Committee shall —

- (i) formulate and recommend the CSR policy to the Board;
- (ii) recommend the amount of expenditure to be incurred on CSR activities;
- (iii) recommend to the Board on budget allocation for any CSR project including modalities of utilisation of funds in every project;
- (iv) align with the Menzies Aviation Group CSR objectives and reporting, project selection and reporting requirements;
- (v) monitor the CSR policy of the company from time to time; and
- (vi) formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the items as mentioned in rule 5(2) of the Companies (CSR Policy) Rules, 2014, including providing for modalities of utilisation of funds.

**The Board of Directors of the Company shall —**

- Approve the CSR policy.
- Disclose contents of such policy in its report and also place it on the company's website,.
- Ensure that the activities included in the CSR policy are undertaken by the company;

- Ensure that the company spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years;
- Give preference to the local area and areas around where the Company operates, for spending the amount earmarked for Corporate Social Responsibility activities.
- Satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it
- Satisfy itself regarding the utilisation of the disbursed CSR funds.
- Share and disclose CSR plans and reporting to the Menzies Aviation Sustainability team as part of the parent company due diligence and reporting requirements.
- If the company fails to spend at least two per cent of the average net profits of the company, the Board shall, in its report made under clause (o) of sub-section (3) of section 134, specify the reasons for not spending the amount and transfer the unspent CSR amount as per provisions of sections 135(5) and 135(6) of the Act; and
- Any other functions as per the provisions of the Act and CSR rules.

#### **4. CSR EXPENDITURE AND ACTIVITIES:**

- The CSR expenditure shall include the projects or programs relating to CSR activities approved by the Board of Directors / the CSR Committee (as may be applicable) but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.
- The spending of CSR Amount shall be in accordance with the Provisions of Section 135 of the Companies Act 2013 read with rules made thereunder and as per Schedule VII of the Companies Act 2013 (as amended).
- The Board of Company Shall ensure that in each financial year, the Company spends at least 2% of the average net profit made during the immediately preceding financial years.
- The Unutilized CSR budget from the 2% of the average net profit will be parked in a CSR Fund (Corpus) created by the Company clearly specifying the project to which the amount will be spent. This fund also includes any income arising there from and any surplus arising out of CSR Activities.

#### **CSR Program Areas & Objectives**

- to take up those initiatives and identify those activities where social needs are un-met but which are essential for an optimum equilibrium among masses;
- to enable undertaking CSR activities either by the Company on its own or by engaging appropriate implementation partners for deeper penetration of such activities and for a societal impact; and

- to collaborate with other Organisations/NGOs in India for conducting CSR activities to bring in economies of scale, and pooling of resources, among others.

The company mainly focuses on sustainable practices that benefit the environment and society. Corporate Social Responsibility (CSR) is a concept whereby organizations serve the interests of the society by considering the impact of their activities on customers, employees, shareholders, communities and the environment in various aspects of their operations.

**The Company will be focussing on the activities specified in Schedule VII as under**

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh 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 Paramilitary Forces (CPMF) veterans, and their dependents including widows.
- (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 Defence 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 United Nations Sustainable Development Goals (SDGs).

(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.

## 5. CSR GOVERNANCE STRUCTURE



## 6. IMPLEMENTATION

The Company may undertake any of the CSR activities as highlighted under the head 'Focus Areas' either by its own or through the below implementing agencies: -

### The CSR Agencies / Collaborators could be:

I. 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 (43 of 1961), established by Holding company / Bangalore International Airport Limited/ any group company either singly or along with any other company, or

- II. 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
- III. any entity established under an Act of Parliament or a State legislature; or
- IV. 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.

The Company may also collaborate with other Companies for undertaking projects or programs or CSR activities in such a manner that the Companies are in a position to report separately on such projects or programs.

Due diligence will be undertaken on partner organisations before engagement commences.

In case of failure to ensure the minimum CSR expenditure, details / reasons for the same should be submitted by the Board, which shall be included in their report to the Shareholders.

## 7. MONITORING MECHANISM

CSR Committee of Board / the Board of Directors (as may be applicable) of the Company will review the policy from time to time based on the changing needs and aspirations of the target beneficiaries and make suitable modifications as may be necessary.

The Company will ensure CSR reporting annually in the format recommended in the CSR rules as part of its annual report.

The CSR progress monitoring shall be done by either CSR committee/ Board of Directors through a Meeting as may be applicable as below to review the CSR Progress.

Sl.No.	CSR Progress Review and Monitorig Authority	Frequency of Review
1.	Board of Directors	Annually
2.	CSR Committee	Half yearly

## 8. DISPLAY OF CSR ACTIVITIES ON WEBSITE

As per rule 9, the Board of Directors of the company shall mandatorily disclose the following on their website, if any, for public access:

- (i) Composition of the CSR Committee.

- (ii) CSR Policy; and
- (iii) Projects approved by the Board/Committee.

## **9. ACCOUNTING AND AUDITING**

The Company will follow the Accounting and Auditing Guidance Note / Standards duly approved by the Ministry of Corporate Affairs, or if any.

## **10. REPORTING**

The Company will make a full report of its CSR projects / programmes undertaken during the year in the format prescribed for the “Annual Report on CSR Activities to be included in the Board’s Report” in the Companies (CSR Policy) Rules, which is in consonance with section 134(3)(o) of the Act.

Reporting will also be included in the Menzies Aviation annual reporting and required sustainability disclosures.

The CSR policy has been approved by the Board of Directors in the meeting held on .....