

**CORPORATE SOCIAL RESPONSIBILITY
POLICY(REVISED)
OF AEQUS SEZ PVT LTD**

With effect from May 29, 2025

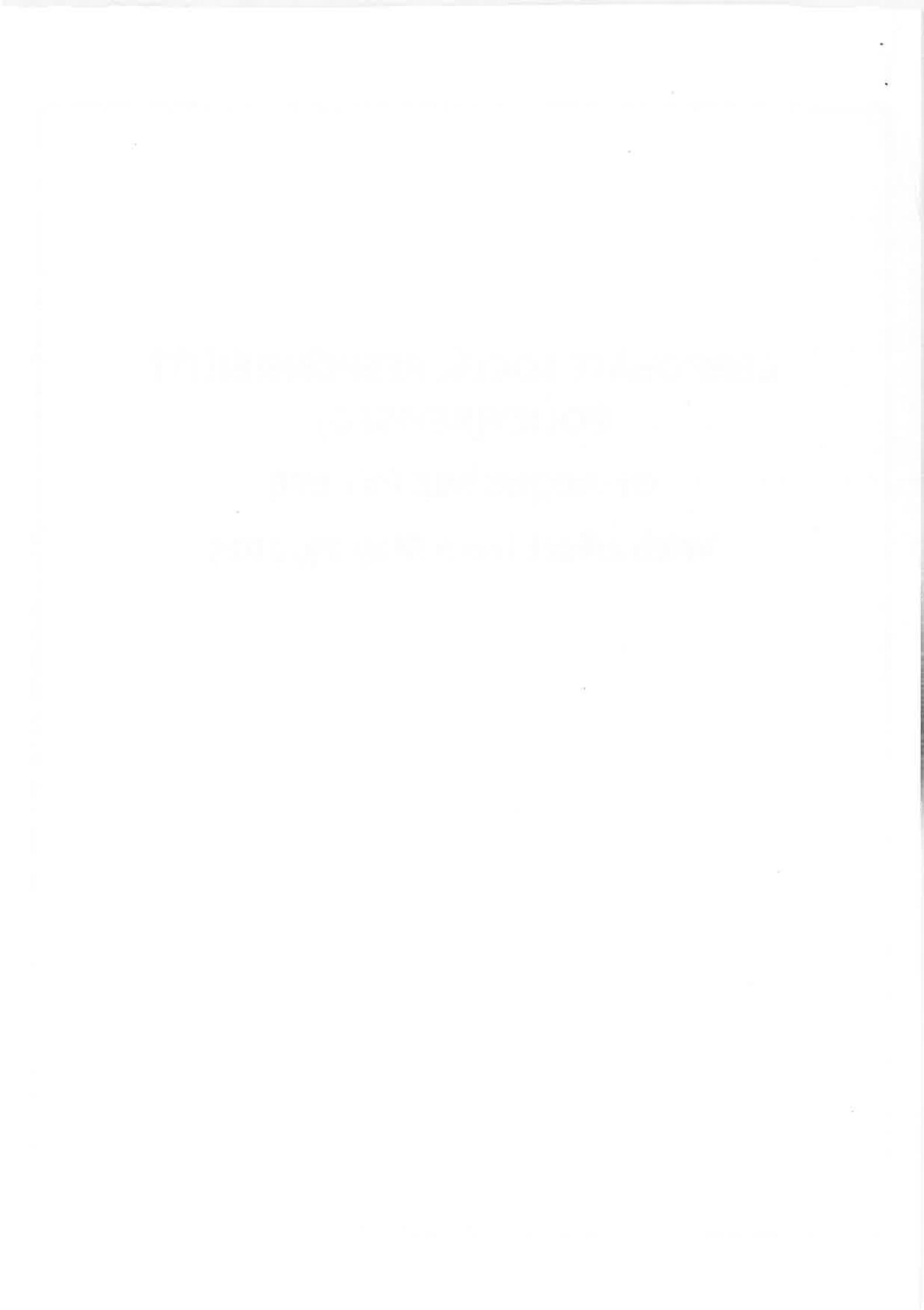


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Preamble

Aequus SEZ Private Limited ("ASEZ"/"Company"/"We") is part of Aequus group of companies. This Corporate Social Responsibility stemming out of the Aequus Group overall policy and concept about Corporate Social Responsibility

Purpose

At Aequus SEZ Private Limited, we believe on Transparency, Trust and Respect. While contributing towards betterment of the society, We will be performing with the same philosophy of Transparency. Commitment towards betterment of society is an integral part of our journey. As a responsible corporate citizen, We believe that gratitude towards society is much bigger than supporting the good causes. It includes the work that impacts people and the quality of their life positively by achieving inclusive growth and contributing towards empowering the communities. It is a way of giving back something to the society with gratefulness which has the considerable positive impact and which will create sustainable social value. We are committed towards responsible business practices as well as sustainable development. We also consider the importance of environment and natural resources. We want community in the neighborhood should get benefited from the very presence of Us.

Policy Statement

For us, Corporate Social Responsibility (CSR) is not just a legal compliance, it is an integral part of our journey in this society. Our goal is to achieve sustainable and inclusive growth of community through our CSR initiatives.

By understanding the demographic dividend of India, We initiate our CSR on such grounds, where we can contribute in best way through our core competencies. Our efforts are aimed for better education, development and empowerment of future citizens of the nation. We would like to initiate and implement series of various interrelated and interconnected sustainable programs and projects. Our projects will be in the domain of education, health, hygiene, environment and safety, emphasizing socially and economically underprivileged school children and institutions related to them.

We shall integrate the culture of volunteering to leverage the managerial and technological core competency We possess as a company.

Our CSR activities are included but not limited to following focus areas:

1. STEM (Science, Technology, Education and Mathematics) Education and Awareness among government school students.
This focused area is one of the area specified under Section 135, Schedule VII. Precisely Schedule VII (ii) of Indian Companies Act 2013
2. Infrastructural and Intellectual support towards health, hygiene and sanitation facilities of beneficiaries. (falls under the purview of Schedule VII (i) of *Indian Companies Act 2013*.)
3. Preservation of environment and natural resources.
4. Neighborhood projects as per local needs

Broad Objectives of our CSR Activities.

- To facilitate and provide enhanced eco system for quality public education for socially and economically underprivileged children focusing on STEM – Science Technology Education and Mathematics
- To provide support to children to enhance hygiene and sanitary infrastructure.
- To provide necessary health assistance and education with respect to the preventive health care targeting behavior change of beneficiaries.
- To conserve and enrich of ecosystem of environment and natural resources
- To give boost for young talent by providing skill based vocational trainings to improve the employability
- To do a socially impactful intervention in neighborhood areas

Defining the ultimate population

Focused segments of population for our CSR initiatives are

- Underprivileged school children who are of in need of necessary basic educational and health facilities
- Youth who are away from livelihood opportunities due to lack of skills and vocational trainings
- Communities situated at operational region of our business.

Guiding Principles

Our focus here is

- Scenario of need

Our social initiatives are guided by the scenario of the need of the society around our operational region.

- Sustainability element

Sustainability of the project gives a better positive outcomes and it enables better evaluation of initiatives.

- AEQATRA – Employee Volunteering Program

We support in the volunteering program of employees in our CSR projects by giving them necessary skills to run the activities. Volunteers will add value by sharing their knowledge, experience and expertise in specific domains, thereby adding uniqueness to the programs.

Thrust Area

To achieve the maximum positive change and to generate maximum social value by employing limited available resources. We will focus on specific following mentioned areas of interventions:

- a. Child and Girl's Education, Health and Hygiene.
- b. Quality education and supporting infrastructure for schools
- c. Vocational training focused on employable skills.
- d. Sustainable environment and preservation of natural resources
- e. Neighborhood projects as per the local needs identified nearby operational area.

- Education Program

This program concentrating on project to improve student's educational performance by providing them their educational needs in a way of Infrastructure Support as well as Intellectual Support. Projects also focuses on providing experiential learning in the subject of Science Technology Education and Mathematics.

- **Health Program**

This program consist various projects concentrating on various health issues of school children focusing on their physical, mental health, nutrition and awareness about health and hygiene. Aiming to improve health indicators as well as reducing school dropout and boost overall performance of students.

- **Skill development and employability enhancement**

This program focuses on making available various opportunities to learn vocational skills to unskilled or semiskilled youth. It will help to improve their employability and it will lead them to update skills with new technologies. By imparting industry-relevant skills to the needy youth, the objective is to help this group to access suitable employment.

- **Preservation of Environment and Natural Recourses**

In the era of climate change and global worming we understand our responsibility towards preserving environment and natural resources. Our programs and projects will undertake the strategic and long term sustainable activities, to maintain the clean environment through tree plantation, harvesting of water and preserving other natural resources.

- **Neighbour-hood projects as per local needs**

This program is related to various rural and community development projects focusing on engagement with neighbour-hood communities in operational areas.

Scope

Our CSR policy will apply to all projects/programs initiated as a part of Aequus group Corporate Social Responsibility activities. Policy is developed, and would be reviewed, and updated as per the requirement and determined procedure and process. The policy is in compliance with the Companies Act, 2013, Schedule VII of the Act and the Rules made there under, as amended from time to time.

Governance

- Execution, Monitoring and Evaluation of CSR programs will be done by the Directors of the Company (“Directors and the personnel working for CSR activities together hereinafter referred to as “CSR Team”).

Resources and Budget Allocation

Board of Directors will initiate annually the budget and annual plan and approve it.

Supervision

CSR projects will be driven by CSR Team under the guidance, support and close association with Aequus Foundation. CSR Team will play an important role in executing and monitoring of projects undertaken.

Implementation Plan

- Every project should have defined objectives.
- Project should have definite timeframe of implementation
- Programs can be implemented by the direct implementation or by Aequus Foundation or by any other NGO or Trust which has an expertise in the specified project domain and recommended by Aequus Foundation or Board of Directors.
- Programs can be implemented with the partnership of Government departments or any like-minded organizations.
- Approval relating to methodology of implementation, budgetary requirements, objectives and outcome proposed, stakeholder's involvement must be approved by Board of Directors.
- CSR Team must follow the exit policy of program as may be recommended.
- Company will undertake need assessment, baseline survey and impact assessment while implementing projects

Implementation Partnership

CSR projects shall be executed directly or by the other implementation partners internal or external, depending on the requirements. Company will be in partnership with other NGOs or Organizations from time to time and project to project as per the requirements. CSR Team shall evaluate the application of partnership of various NGOs on the basis of specified criteria and established track record of at least three years to achieve maximum social value. The performance will also be measured by the committee periodically.

Company will also associate with government agencies while undertaking the project as per the requirements.

The Company may adopt a sub-granting mechanism wherein CSR funds are allocated to implementing partners, who may further disburse these funds to eligible sub-partners, ensuring full compliance with due diligence, transparency, and regulatory requirements

Timelines and Disbursements

- Project should have a timeline which need to be mentioned in the MOU or any other definitive agreements with implementing partners and which shall be monitored by the CSR Team.
- Such MOU or definitive agreements shall have objectives, deliverables and timeline of the project
- Appropriate disbursement policy and plan need to discuss with implementation partner and approve by Board of Directors which need to be mention in the MOU.

Monitoring

- CSR Team shall develop a monitoring mechanism for each project and program requirements.
- CSR Team will be responsible to monitor project periodically and report to Board of Directors of the Company.
- Annual evaluation should be conducted by Directors along with the CSR Initiative team at Aequus Foundation.

- CSR Team needs to adopt the mechanism to evaluate the outcome and impact of the project.

Reporting

- The CSR Policy to be uploaded on company's website, if any.
- The Director's Report within the annual report of the company shall include:
 - Brief outline of the company's CSR policy including:
 - An overview of activities proposed to be undertaken
 - Reference to the web-link to the CSR policy and projects or programs
 - Composition of Board CSR Committee, if applicable
 - Average net profit for the last 3 financial year
 - Prescribed CSR Spend
 - Details of CSR activities/projects undertaken during the year:
 - Total amount to be spent for the year
 - Amount unspent, if any and reason for not spending the total amount

About Aequus Foundation: Aequus Foundation is a private limited company incorporated under Section 8 of the Indian Companies Act. Aequus Foundation is co-founded by Aequus Private Limited and Aequus SEZ Private Limited, the prime parent companies of Aequus Group representing Aerospace and infrastructure verticals. Aequus Foundation is incorporated with the main objective to serve as a non-profit organization of Aequus Group serving the society at large and be the face of Aequus for group's Corporate Social Service.



 Shrivankumar Kulkarni

Director (DIN- 10218933)

Date: May 29, 2025

