Annexure – 2

1. Corporate Social Responsibility Policy:

Philosophy:

Recognizing that business enterprises are economic organs of society and draw on societal resources, it is Company's belief that its performance must be measured by its Triple Bottom Line contribution to building economic, social and environmental capital towards enhancing societal sustainability. Company believes that in the strategic context of business, enterprises possess beyond mere financial resources, the transformational capacity to create game-changing development models by unleashing their power of entrepreneurial vitality, innovation and creativity. In line with this belief, company will continue crafting unique models to generate livelihoods and environmental capital. Such Corporate Social Responsibility ("CSR") projects are far more replicable, scalable and sustainable, with a significant multiplier impact on sustainable livelihood creation and environmental replenishment. These initiatives are independent of the normal conduct of Company's business. Programmes, projects and activities (collectively "CSR Programmes") carried out in this regard are the subject matter of this Policy.

CSR Policy:

It is Company's policy:

- 1. To direct Company's CSR Programmes, inter alia, towards achieving one or more of the following Eradicating hunger, poverty and malnutrition; Promoting education including special education; promoting healthcare; providing preventive healthcare; providing sanitation and drinking water; conservation of water; creating livelihoods for people, especially those from disadvantaged sections of society in rural and urban India; preserving and promoting sports; enhancing environmental and natural capital; animal welfare; supporting rural development; 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; take measures for the benefit of armed forces veterans, war widows and their dependents; promote religion; protection of national heritage, art and culture; to promote rural sports, nationally recognised sports, paralympic sports and olympic sports.
- To develop the required capability and self-reliance of beneficiaries at the grass roots, especially of women, in the belief that these are prerequisites for social and economic development;
- To engage in affirmative action interventions such as skill building and vocational training, to enhance employability and generate livelihoods for persons from disadvantaged sections of society;
- To pursue CSR Programmes primarily in areas that fall within the economic vicinity of the Company's operations to enable close supervision and ensure maximum development impact;
- To carry out CSR Programmes in relevant local areas near to the factory site of the company and such other areas as may be determined by the CSR committee to fulfill

commitments arising from requests by government/regulatory authorities and to spend such monies through CSR Cells of such administrative bodies of the government and/or directly by way of developmental works in the local areas around which the Company

Implementation:

- CSR activities shall be undertaken by the company itself or through—
 - (a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
 - (b) 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
 - (c) any entity established under an Act of Parliament or a State legislature; or
 - (d) 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. In such cases, the Company will specify the CSR Programmes which may be undertaken by these entities in accordance with their Objects and administrative and accounting processes laid down in the respective Trust Deeds/ Memorandum and Articles of Association
 - in accordance with the provisions of Section 135 of Companies Act, 2013 and Rules made thereunder as amended from time to time.
- (2) A company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.
- (3) The Board of Directors of a company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- (4) In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

Governance:

Every year, the CSR Committee will place for the Board's approval, a CSR Plan delineating the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary. The CSR Committee will assign the task of implementation of the CSR Plan within specified budgets and timeframes to such persons or bodies as it may deem fit. The persons/bodies to which the implementation is assigned will carry out such CSR Programmes as determined by the CSR Committee within the specified budgets and timeframes and report back to the CSR Committee on the progress thereon at such frequency as the CSR Committee may direct. The CSR Committee shall review the implementation of the CSR Programmes once in every six

months and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy. At the end of every financial year, the CSR Committee will submit its report to the Board.

CSR Expenditure:

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan. Moreover, any surplus arising from any CSR Programmes shall be used for CSR. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

2. Composition of the CSR committee:

| Name of Member | Category | Designation | No. of meetings attended / held |
|-------------------------------|------------------------|-------------|------------------------------------|
| Shri Bhogilal Ishwarlal Patel | Managing Director | Chairman | 2/2 |
| Shri Popatlal Bhopabhai Patel | Whole-time Director | Member | 2/2 |
| Smt RitabenPrakashbhai Patel | Non-executive Director | Member | 2/2 |

Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the Company:

Composition of CSR committee - https://patelsairflow.com/ CSR Policy - https://patelsairflow.com/ CSR projects approved by the board - https://patelsairflow.com/

4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, if applicable (attach the report).

As per Rule (3) (a) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, Every company having average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study. Hence, Company is out of purview of this rule due to the less CSR obligation i.e. less than ten crore rupees for the F.Y. 2023-24.

5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any:

| Sr. No. | Financial Year | Amount available for set-off from preceding financial years (in Rs.) | Amount required to be setoff for the financial year, if any (in Rs.) | |
|------------|-------------------|--|--|--|
| (4) | - | Nil | Nil | |

- 6. Average net profit of the Company as per Section 135(5): Rs. 37,497,089.67/-
- 7. (a) Two percent of average net profit of the Company as per section 135(5): Rs. 749,941.79/-
 - (b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years: NIL
 - (c) Amount required to be set off for the financial year, if any: NIL
 - (d) Total CSR obligation for the financial year (7a+7b-7c): Rs. 749,941.79/-
- 8. (a) CSR amount spent or unspent for the financial year:

| Total Amount Spent for the Financial Year. (In Rs.) | Amount Unspent | | | | | | | |
|---|----------------|---|--|--------|---------------------|--|--|--|
| | Unspent C | ount transferred to CSR Account as per ction 135(6) | Amount transferred to any fund specified under Schedule VII as pe second proviso to Section 135(5) | | | | | |
| | Amount | Date of transfer | Name of the Fund | Amount | Date of transfer | | | |
| Rs. 7,50,000/- | N.A. | N.A. | N.A. | N.A. | N.A. | | | |

(b) Details of CSR amount spent against ongoing projects for the financial year: Not Applicable

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 |
|-----------|------------------------------|---|-------------------------------|---|---------------------|---|-------|--|--|---|
| Sr No. | Name of the Project | Item from the list of activities in Schedule VII to the Act | Local area (Yes/ No) | Location of the project (state, District) | Project duration | Amount allocated for the project | spent | Amount transferred to Unspent CSR Account for the project as per Section 135(6) | Mode of Implemen -tation Direct (Yes/No) | Mode of Implementation Through Implementing Agency (Name CSR Number) |
| - | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. | N.A. |

(c) Details of CSR amount spent against other than ongoing projects for the financial year:

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | | |
|-----------|--|---|-------------------------------|---|--------------------------------------|----------|--|---|--|
| Sr No. | Name of the Project | Item from the list of activities in Schedule VII to the Act | Local area (Yes/ No) | Location of the project (state, District) | spent for in the project (Rs.) | implemen | Through In | mplementation Implementing Agency | |
| | | | | | | | Name | CSR registration number | |
| 1 | Promoting Health Care including Preventive Health Care | | No | Kadi, Mehsana, Gujarat | 75000 | No | Kadi Taluka Public Charitable Trust-Kadi | CSR00015465 | |
| | • | TOT | AL | 75000 | - | . 2 | - | | |

- (d) Amount spent in Administrative Overheads: 0
- (e) Amount spent on Impact Assessment, if applicable: 0
- (f) Total amount spent for the Financial Year (8b+8c+8d+8e): Rs. 7,50,000/-
- (g) Excess amount for set off, if any: Rs. 58.21/-

| Sr. No. | Particular | No. of meetings attended / held |
|------------|---|------------------------------------|
| (i) | Two percent of average net profit of the Company as per Section 135(5) | 749,941.79 |
| (ii) | Total amount spent for the Financial Year | 7,50,000 |
| (iii) | Excess amount spent for the financial year [(ii)-(I)] | 58.21 |
| (iv) | Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any | 0 |
| (v) | Amount available for setoff in succeeding financial years [(iii)-(iv)] | 58.21 |

9. (a) Details of Unspent CSR amount for the preceding three financial years: Not Applicable

| Sr No. | Preceding Financial Year | Amount transferred to Unspent CSR Account under Section135(6) | Amount spent in there porting Financial Year | Amount transfer red to any fund specified under Schedule VII as per Section 135 (6), if any | | | Amount remaining to be spent in succeeding financial years |
|-----------|--------------------------------|--|--|---|--------|----------------|--|
| | | | | Name of the Fund | Amount | Dateoftransfer | 8 |
| 2 | | NIL | 12 | - NIL - | | 523 | 2 |

(b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s): Not Applicable

| (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|-----------|------------|---|--|---------------------|--|---|--|---|
| Sr No. | Project ID | Project ID Name of the Project | Financial Year in which the project was commenced | Project duration | Total amount allocated for the project | Amount spent on the project in the reporting Financial Year | Cumulative amount spent at the end of reporting Financial Year | Status of the project - Completed/ Ongoing |
| in . | - | | NIL | - | NIL | NIL | NIL | |

10. In case of creation or acquisition of capital asset, furnish the details relating to the assets ocreated or acquired through CSR spentin the financial year (asset-wisedetails)

- (a) Date of creation or acquisition of the capital asset (s): None
- (b) Amount of CSR spent for creation or acquisition of capital asset : NIL
- (c) Details of the entity or public authority or beneficiary under whose name such capital assetis registered, their address etc.: Not Applicable
- (d) Provide details of the capital asset (s) created or acquired (including complete address and location of the capital asset): Not Applicable
- 11. Specify the reason (s), if the company has failed to spend two percent of the average net profit as per Section 135 (5): Not Applicable

By the order of Board of Directors For, PATELS AIRFLOW LIMITED

Place: Ahmedabad Date: 22nd August, 2024

BHOGILAL ISHWARLAL PATEL
Chairman, CSR Committee, Managing Director
(DIN: 00144617)

POPATLAL BHOPABHAI PATEL Chairman / Wholetime Director (DIN: 00145058)

SMT RITABEN PRAKASHBHAI PATEL Non-executive Director (DIN: 10040126)