

**Corporate Social Responsibility Policy Of
Quest 2 Travel.com India Private Limited
in accordance with Section 135 of the Companies Act 2013 and
the Companies (Corporate Social Responsibility Policy) Rules, 2014**

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1. Preamble:

Quest 2 Travel.com India Private Limited (hereinafter referred to as “the Company”) has always endeavoured to contribute in every possible way to fulfil its commitment as a responsible corporate resident of India. Through this Corporate Social Responsibility (CSR) Policy we are trying to support our constant endeavour to bring about positive difference to communities where we exist. We sincerely believe that behind the success of our business growth is the strong sense of shared values of Integrity, Customer Orientation and Future Mindedness. The main objective of this Policy is to establish focused and sustainable contribution towards the growth of the community vide various initiatives and programmes through Company’s personnel or through external implementing agencies or through its own dedicated foundation.

In conformity with the 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”), Government of India, under Section 135 of the Companies Act, 2013 (“the Act”) read with Schedule VII to the Act, this CSR Policy has been approved by the Board of Directors of the Company.

2. Focus Area:

In pursuit of its CSR objective, the Company would undertake various programs and projects in the following key areas of focus:

- (i) Eradicating hunger, poverty and malnutrition, promoting healthcare (including preventive healthcare), 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 centers 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 the rejuvenation of river Ganga.;
- (v) Protection of natural 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 arts and handicrafts;
- (vi) Contribution to the Prime Minister’s National Relief Fund or Prime Minister’s Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic

development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;

- (vii) Rural development projects;
- (viii) Slum area development and;
- (ix) Disaster management, including relief, rehabilitation and reconstruction activities.

The above is an illustrative list and the Company may, subject to the approval of the Board of Directors, contribute on any activity in line with the activities prescribed under Schedule VII to the Companies Act, 2013 from time to time.

3. CSR committee:

Constitution: The Company shall constitute a Corporate Social Responsibility Committee (CSR Committee) as and when the Company's liability to spend on Corporate Social Responsibility exceeds Rs.50,00,000/- (Rupees Fifty Lakhs). The CSR Committee will have at least 2 directors from the Board of Directors and the Company Secretary of the Company, if any, will act as Company Secretary of the CSR Committee.

In case CSR Committee is not required to be constituted, the functions of CSR Committee shall be executed by the Board of Directors.

4. Implementation:

The Company would implement its CSR Programmes through its employees or through external implementing agencies or through trusts, charitable societies and/or Section 8 companies that are established or that may be established by the Company or its holding/subsidiary/associate/group company from time to time. In such cases, the Company will specify the CSR Programmes which may be undertaken by those trusts, societies or companies in accordance with their objects and administrative and accounting processes laid down in the respective Trust Deeds/ Memorandum and Articles of Association.

In the event an external agency is engaged for the CSR initiatives, the following broad parameters shall be considered while appointing any external agency:

- a. Legally authorized to undertake CSR activities.
- b. Confirmation of the ethical and clean track record of the agency, having a track record of at least at least three years of working in CSR areas.
- c. Duly registered under Sections 80G and 12A of the Income Tax Act.
- d. Has obtained a Unique CSR Registration Number from the Ministry of Corporate Affairs.
- e. The agency shall have the requisite systems and processes in place for monitoring and reporting.
- f. Such other conditions as may be decided by the CSR Committee/Board of Directors from time to time.

5. Governance:

Every year, the Board of Directors will consider and approve a CSR Plan and a Budget outlining the CSR Programmes to be carried out during the financial year.

The persons/bodies to which a particular CSR project is assigned will carry out such CSR activities within the specified budgets and timeframes and report back to the Company on the progress thereon at such frequency as the Board of Directors may direct. The Board of Directors shall review the implementation of the CSR Programmes periodically and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy.

6. CSR Budget:

The Board shall approve overall limits for CSR Activities to be undertaken by the Company in a financial year, with regard to individual projects/ programs, including contribution towards corpus funds, if any. The budget allocated in any financial year should not be less than 2% of its average net profit* made during the three immediately preceding financial years. The projects/ programs or activities to be chosen by the Company shall correspond to its CSR Policy as well as its annual action plan, as amended from time to time.

7. CSR Expenditure:

The Company shall strive to spend the budgeted amount allocated for CSR activities/projects planned for each financial year, within that year. If for any reason, any of the provisioned annual budget remains unutilized, the same shall be treated in the following manner:

- i. **In case of an Ongoing Project#:** The unspent amount shall be transferred to a special account opened by the Company in any scheduled bank i.e., 'Unspent CSR Account' within 30 days of the end of the financial year, or within such other time period as may be specified in the Act or CSR Rules from time to time, and such sum shall be spent during the next three (3) financial years from the date of transfer, in the manner prescribed under the Act read with CSR Rules, failing which, the Company shall transfer the same to a fund specified in Schedule VII, within a period of 30 days from the date of the completion of the third financial year.
- ii. **In case of activities/projects other than Ongoing Project:** The unspent amount shall be transferred to funds specified in Schedule VII to the Act, or such other fund(s) as may be specified under the Act or CSR Rules, within 6 months of the close of the financial year or within such other time period as may be specified from time to time.

**For the purpose of calculation of CSR budget, net profit shall be calculated in the manner as prescribed under Section 198 of the Companies Act, 2013.*

#Ongoing Project means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification;

The Board may during any financial year, approve to undertake CSR expenditure beyond the CSR obligation for that particular financial year. The excess amount incurred by the Company on CSR projects, programs or activities shall be carried forward for set off against the CSR obligation of the Company for the next three consecutive financial years in the manner decided by the Board subject to compliance with the provisions of the Act and the Rules.

Any 'Income' or 'Surplus' that may arise from its CSR activities will not form part of business profits of the Company and shall be treated in the following manner:

- i. ploughed back into the same project, or
- ii. transferred to the unspent CSR account, if any, and it should be spent in pursuance of this CSR policy and annual action plan of the Company, or
- iii. may be transferred to a fund specified in Schedule VII to the Act, within a period of six months of the expiry of the financial year.

The CSR activities of the Company shall not include any benefit which is exclusively for the employees of the Company or their family members.

The Board of Directors shall ensure that the administrative overheads shall not exceed such percentage of total CSR expenditure of the Company as prescribed and notified in the Act read with CSR Rules.

8. Location:

All CSR projects / programs under this Policy shall be undertaken within India, primarily in the local areas and areas around it, where the Company operates. The Board of Directors shall decide on locations for implementation of the CSR projects / programs.

9. Monitoring and Disclosures:

The Company recognizes that regular and robust monitoring is critical for CSR projects and hence, the implementation and monitoring of the CSR activities and projects shall be overseen by the Board of Directors. The Board shall periodically monitor the key performance indicators such as timelines, utilization of funds, targets, qualitative and quantitative impact, etc. depending on the nature and need of the CSR project.

If the projects are being implemented by an implementation agency, the Board may designate special executives for monitoring of the CSR projects. The monitoring and evaluation may also be assigned by the Board of Directors to an independent external agency for the sake of objectivity and transparency.

The periodic report concerning the status of CSR activities should be submitted to the Board of Directors, which shall monitor to plan out the mid-course correction in implementation, whenever required.

Impact Assessment:

The Board may undertake a study to assess the impact created by the CSR activities of the Company. For the said purpose, the Board may designate special executives for this purpose or avail the services of specialized agencies.

In case the Company's average CSR expenditure obligation is ten crore rupees or more, in the three immediately preceding financial years, the Company shall mandatorily undertake an impact assessment, through an independent agency, of their CSR projects or activities having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

The impact assessment reports shall be placed before the Board of Directors and shall be annexed to the annual report on CSR.

Disclosure:

It shall be the responsibility of the Board of Directors to ensure that appropriate disclosures are made to the shareholders in the Company's annual reports.

The contents of the CSR Policy and the annual action plan (i.e. projects approved by the Board) shall be disclosed in the Board's report and on the website of the Company.

10. Amendments to the CSR Policy:

The Board of Directors of the Company shall have the powers to revise/modify/amend this Policy from time to time, as the Board may think fit, based on the recommendations to be made by the CSR Committee to confirm to the revision/amendment, if any, made to the CSR Rules by the MCA, under the Act.

11. Contact Details:

For any clarification / query related to CSR policy of the company, please contact at:

Email id: compliance@go-mmt.com