

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

**NAVRATHAN JEWELLERS PRIVATE LIMITED
(CIN: U27205KA1993PTC014077)**



NAVRATHAN JEWELLERS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

I. BACKGROUND

Corporate Social Responsibility (CSR) embodies the various initiatives and programs of NAVRATHAN JEWELLERS PRIVATE LIMITED ("Company") in the communities and environment in which the Company operates. It represents the continuing commitment and actions of the Company to contribute towards economic and social development and growth.

II. OBJECTIVE

The CSR Policy of the Company has been formulated and adopted in terms of Section 135 of the Companies Act, 2013 and the Rules made there under. The Company will undertake CSR activities specified in Schedule VII to the Companies Act, 2013 (**Annexure - A**).

III. CONSTITUTION OF CSR COMMITTEE

The Board of Directors of the Company has constituted a CSR Committee.

The members of the CSR committee are as follows:

Sr. No.	Name of the Member	DIN	Designation / Nature of Directorship
1	Mr. Goutham Mangilal Chand	00425725	Managing Director
2	Mr. Mitesh Bafna Ganapatraj	07717681	Director

The Board of Directors of the Company, by passing a Board Resolution in their meeting, may alter the constitution of the CSR Committee, if required.

IV. ROLE OF CSR COMMITTEE

The CSR Committee will play the following role in fulfilling the Company's CSR objectives:

- Recommendation of the project/programme to be undertaken within the long term vision and strategy of the Company in respect of CSR activities, amount of expenditure to be incurred, type of activities, roles and responsibilities of various stakeholders, take appropriate initiatives for implementation of CSR activities, etc.,
- Formulation of a monitoring mechanism for ensuring implementation of the projects / programmes undertaken or the end use of the amount spent by it towards CSR activities.

V. ROLE OF BOARD OF DIRECTORS

The role of the Board with respect to CSR is as under:

- Review the recommendations in respect of annual budget for CSR;
- Disclose contents of the Policy in the Company's report/ website; and
- Ensure that the Company spends in every financial year, at least two percent of the average net profits made during the three immediately preceding financial years of the Company on CSR activities.

VI. DISBURSEMENT OF CSR AMOUNT

The Company may undertake CSR activities, on its own or by pooling the resources into other non-profit organisations (NGOs) or a combination thereof. CSR Team [Whether Internal or Other NGO] will also assist the Board and the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal/external) on a periodic basis.

CSR Team will after evaluating proposals received under the CSR Activities, make its recommendations to the CSR Committee. The CSR Committee will deliberate on the proposals and approve proposals for implementation at its discretion.

CSR Team will collaborate with stakeholders to monitor the status of each project and will report its findings to the CSR Committee periodically. The CSR Committee will decide on the budget allocation for CSR Projects and Programs and the instalments for disbursement of amount.

The contribution will be made for any activities undertaken within India. The Committee will give preference to the local area and areas around it where it operates in spending the amount earmarked for CSR activities.

Surplus, if any, arising out of the CSR activities will be utilized for the benefit of the community.

VII. PARTNERING ORGANISATIONS

While undertaking any project or program with other partnering organizations, the Company will undertake due diligence to evaluate the NGO's reputation, track record, capacity and competency, including organization structure, requisite permits and licenses, presence in desired geography and compatibility with the Group CSR Policy.

VIII. PROCESS FOR UNDERTAKING CSR ACTIVITIES/ PROJECTS THROUGH PARTNERING NGOS

The following procedure will be adhered to while undertaking/funding CSR activities/ projects through NGOs:

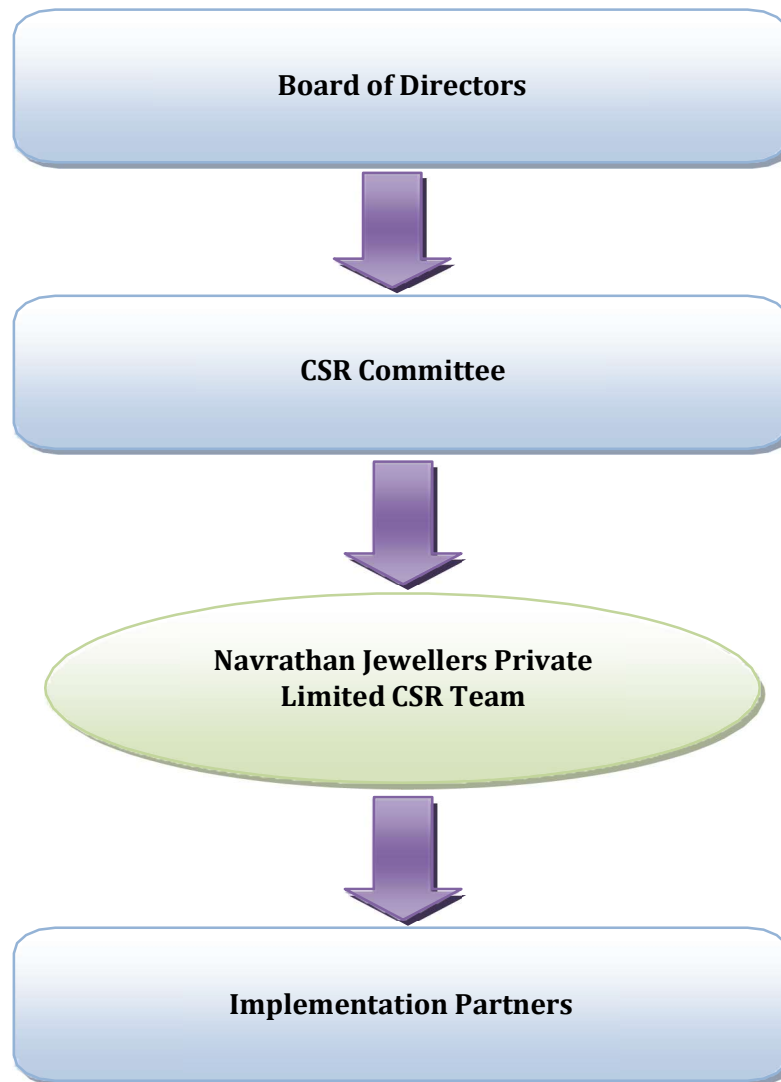
- Presentation of Project/program details.

- The NGO shall have minimum track record of three years.
- CSR Committee may enlist the key roles and responsibilities of each of the parties for a specified project.
- Scheduling of disbursements of funds relating to the program and monitoring system in accordance with pre-agreed milestones with partners.
- The Committee whilst making any contribution will specify the activities for which it is made and the amount for the same.

IX. IMPLEMENTATION

- CSR program will be undertaken by the Company within the defined ambit of Base Line Survey and Need Assessment (if deemed necessary by the Company)
- The time period/duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program.
- The Company may enter into partnerships with the government, business partners and communities to create multiplier effect of its social projects.
- The mode of implementation of CSR programs may include a combination of direct implementation and implementation through trust/foundation/society/Section 8 Companies set up by the Company or others and partners such as NGOs, business partners, registered societies etc. The Company will select its partners after appropriate due diligence.
- The Company may use the services of expert agencies, consultancy firms etc. wherever required for carrying out base line surveys, guidance on project design and implementation, impact assessment surveys etc.
- The teams responsible for implementing the various CSR projects are mentioned in the section on the Governance Structure of the Policy.

X. CSR GOVERNANCE STRUCTURE



XI. MONITORING

CSR Committee will institute a transparent monitoring mechanism for implementation of CSR Projects or programs undertaken by the Company or through NGOs. The Company will institute a well-defined monitoring and evaluation mechanism to ensure that each CSR program has:

1. Clear objectives developed out of the societal needs that are determined through baselines studies and research;
2. Clear targets, time lines and measurable parameters wherever possible;
3. A progress monitoring and reporting framework that is aligned with the requirements of the section 135 of the Companies Act and the CSR Rules;

XII. VOLUNTEERING

The Company will encourage and enable employees and other stakeholders to participate in the projects supported by it through Employee Volunteering Programmes (EVP).

XIII. DISSEMINATION OF INFORMATION

The CSR Committee will report to the Board of Navrathan Jewellers Private Limited from time to time the status of the CSR projects/activities undertaken by it along with the report on the impact created by such projects/activities.

The Company would upload this Policy on its website <https://navrathan.com/>. A detailed status report on the CSR activities carried out by Navrathan Jewellers Private Limited will be disclosed every year as part of the Directors' Report in the Annual Report. The said information will also be uploaded on the website of the Company.

Annexure - A

SCHEDULE VII

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) (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 Para Military Forces (CPMF) veterans, and their dependents including widows;
- (vii) Training to promote rural sports, nationally recognised sports, paralympic sports and olympics sports;
- (viii) Contribution to the prime minister's national relief fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) 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) 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

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 Defense 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 Sustainable Development Goals (SDGs)

- (x) Rural development projects;
- (xi) Slum area development;
- (xii) disaster management, including relief, rehabilitation and reconstruction activities.