

GOLKUNDA DIAMONDS & JEWELLERY LIMITED

**REGISTERED OFFICE: G-30, GEMS & JEWELLERY COMPLEX-III, SEEPZ, ANDHERI (EAST),
MUMBAI-400096**

TEL NO: [022-69524444] | EMAIL: [cs@golkunda.com]

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

PREAMBLE:

Social and environmental responsibility has always been at the forefront of GOLKUNDA DIAMONDS & JEWELLERY LIMITED and as a result the Company consistently contributes to socially responsible activities, Corporate Social Responsibility (CSR). As a responsible corporate citizen, we try to contribute for Social and environmental causes on a regular basis. We believe that to succeed, an organization must maintain highest standards of corporate behavior towards its employees, consumers and societies in which it operates. We are of the opinion that CSR underlines the objective of bringing about a difference and adding value in our stakeholder's lives.

GOLKUNDA DIAMONDS & JEWELLERY LIMITED Corporate Social Responsibility Policy is rooted in the Company's core values of quality, reliability and best practices, and driven by our aspiration for excellence in the overall performance of our business.

With the promulgation of the Companies Act, 2013 (Act) and the notification of Section 135 of the Act read within Schedule VII to the Act, dealing with the aspect of Corporate Social Responsibility as also of the Rules laid down to such effect to the Act, which have come into force on the 1st day of April, 2014 (the CSR Rules), it has become mandatory for the corporate entities falling within the purview of the limits as to Networth, Turnover or Profitability as laid down in the said section read with the CSR Rules, to undertake any one or more of the activities as laid down thereunder, towards the discharge of the responsibility towards the society in general (the "Corporate Social Responsibility" or briefly "CSR").

The Company being a corporate entity falling within the purview of Section 135 of the Act read with CSR Rules, the Committee constituted by the Board of Directors of the Company ("Board"), has in exercise of its authority and discharge of its responsibility, formulated CSR Policy, which has been approved by the Board as the Corporate Social Responsibility Policy of the Company, elaborated as under.

DEFINITION AND INTERPRETATION

1. "Board" means the Board of Directors of the Company.
2. "Company" means **GOLKUNDA DIAMONDS & JEWELLERY LIMITED**.
3. "CSR Activities" means such programs and projects as may be approved by the Board in terms of this CSR Policy.
4. "CSR Committee" means a committee constituted by the Board of Directors in terms of Section 135 of the Act and the CSR Rules.
5. "CSR Rules" means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.
6. "CSR Expenditure" means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.

7. "Director" means a member of the Board of the Company.
8. "Net Profits" means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include (i) any profit arising from any overseas branch or branches of the Company (whether operated as a separate company or otherwise); and (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.

Any term not defined above, shall have the meaning assigned to it under the Act or the CSR Rules.

IMPLEMENTATION OF THE CSR POLICY:

1. The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules and the annual action plan formulated and recommended by the CSR Committee.
2. To ensure that the objectives of CSR Policy are being met in an efficient and effective manner, the utilisation of the amount sanctioned towards CSR Activities should be reported by the CSR Committee to the Board on time to time basis in such manner as may be prescribed.

CORPORATE SOCIAL RESPONSIBILITY ACTIVITIES (CSR ACTIVITIES):

CSR activities mean any one or more of the following objectives/purposes, being pursued/undertaken/to be undertaken the Company, either directly or in collaboration with other companies or any other registered trust or society or a company set up for the purpose of undertaking similar programs or projects, within the purview of CSR Rules:

- (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 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, 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 Para Military Forces (CPMF) veterans, and their dependents including widows];
- (vii) training to promote rural sports, nationally recognised 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 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

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.

REPORTING AND RECORD KEEPING:

The committee shall maintain proper minutes of all its meetings.

The Board's report of the Company shall include an annual report on CSR containing the particulars set out in CSR Rules and such other details as may be prescribed from time to time under the Act and the CSR Rules.

In respect of the reporting, the Board will be responsible to ensure that:

- (i) The report of the Board includes the annual report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules;
- (ii) The contents of the latest and updated version of the CSR Policy is included in the report of the Board;
- (iii) The contents of the CSR Policy along with composition of the CSR committee, and projects approved by the Board are also made available on the website (if any) of the Company.
- (iv) In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same are adequately disclosed in the Board Report.

CSR CONTRIBUTION:

The contribution by the Company in any financial year towards CSR Activities shall be a minimum of 2% of its average Net Profits for three immediately preceding financial years calculated in accordance with the provisions of section 198.

MONITORING AND FUNCTIONING OF THE COMMITTEE:

The Committee towards effectuation and implementation of the CSR Activities shall identify and recommend the specific CSR activity(ies) to the Board of Directors of the Company (Board) for its consideration and approval. Based on the approval of the Board, required funds shall be infused into the Board approved CSR activities. The same shall constitute the CSR Contribution of the Company for the relevant financial year.

The Committee shall monitor the implementation of the CSR activities, towards which end, progress updates on CSR activities undertaken, shall be submitted to the Board, from time to time.

TREATMENT OF SURPLUS ARISING OUT OF CSR ACTIVITIES:

It is hereby explicitly stated that any surplus arising out of the CSR Activities shall not form a part of the business profits of the Company.

OVERALL IMPROVEMENT IN FUNCTIONING AND IN DISCHARGE OF CSR:

The Committee shall from time to time explore the ways and means whereby improvements that need to be brought about towards the discharge of CSR by the Company are identified and steps taken to ensure that measures necessary to effectuate the areas of improvement so identified are taken in the right earnest.

GENERAL:

Any term or aspect not specifically defined or set out in this Policy shall be construed to mean what is laid down in respect thereof under the Act or the CSR Rules.

COMPOSITION OF CSR COMMITTEE:

Sr.No	Name	Position in the Committee
1	Mr. Kantikumar Dadha	Chairman
2	Mr. Ashish Kantikumar Dadha	Member
3	Mr. Vinod Gulabchandji Kankariya	Member

The Company Secretary will serve as the Secretary of the CSR Committee.