

P N GADGIL JEWELLERS PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Preamble:

P N Gadgil Jewellers Private Limited (“Company”) is committed to conduct its business with highest standards of business ethics and in accordance with applicable laws, rules and regulations ensuring full and accurate disclosures. The Company believes in conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior.

The Company’s Corporate Social Responsibility (“CSR”) Policy encompasses the philosophy for delineating its responsibility as a social corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the underprivileged group of Urban and Rural community.

2. Objectives:

For the Company, CSR not only means Corporate Social Responsibility but also Corporate Social Relationships. It is the Company’s commitment to bring an overall positive impact towards sustainable development of the society at large.

In line with this statement the Company’s CSR Objectives are –

- To enhance value creation in the society through the Company’s CSR initiatives and projects;
- To develop sustainable projects through responsible business practices and good governance;
- To design a process for and ensure an increased commitment at all levels in the organization towards social responsibility; and
- To involve its stakeholders and create a support in the process of social transformation.

3. Vision and Mission:

Considering CSR as a strategic social investment, the Company’s, aim is to align and integrate its resources with society’s developmental need.

CSR Vision:

‘To Think Pure and Create Social Environment for Social Transformation’

CSR Mission:

‘To think pure and create a social environment in which underprivileged group can make decisions and make choices either individually or collectively for social transformation’

4. Governance:

This CSR policy has been developed in accordance with Section 135 of the Companies Act, 2013 (Act) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (Rules) as notified by the Ministry of Corporate Affairs, Government of India.

This Policy shall apply to all CSR projects/programmes undertaken by the Company in India as per Schedule VII of the Act.

5. Activities

The CSR activities of the Company will be carried on multiple lines:

a. Promotion of Education:

The first step in social transformation is to think and thinking comes from education and with thought process. The Company may undertake projects or programs or activities aimed at the promotion of education from elementary to professional level to support the students belonging to weaker sections of the society by helping the existing schools in development of their perspective and advocacy programmes to contribute in the social sector for sustainable development.

Further, the Company also intends to supports Vocational Training Centers and Centers for physically challenged students, providing endowments or recognitions to successful candidates pursuing recognized examinations, scholarships or other forms of merit cum means assistance.

b. Empowerment of Women:

In India, the concept of empowerment flows from power. Empowerment of women would mean equipping women with necessary support to be economically independent, self-reliant, to have a positive esteem which would enable them to face any challenges or difficult situations and so that they can participate in developmental activities of the society as a whole.

Commitment of the Company towards women empowerment will be by way of developing SHG (Self Help Group) which would stand as a promising platform to women, launching campaigns for weaker sections of women, developing vocational and technical skill among women, funding their entrepreneurship projects, motivating deserving women in different fields and starting advocacy programmes to protect the rights and interests of women.

c. Promotion of Health Care:

India faces high burden of disease because of lack of environmental sanitation and safe drinking water, under-nutrition, poor living conditions and limited access to preventive and curative health services, lack of education, gender inequality and explosive growth of population. Economic deprivation in a large segment of population results in poor access to health care facilities. Addressing this challenge is essential to achieve the objective of inclusive growth which will be the commitment of the Company. Early diagnosis and treatment are the most cost-effective strategies for developing ones health. In line with this, women health issues will be the foremost priority of the Company.

d. Developing the source of pure drinking water specifically in rural area:

Rural India has more than 700 million people residing in about 1.42 million habitations spread over 15 diverse ecological regions. Meeting the drinking water needs of such a large population can be a daunting task. The non-uniformity in level of awareness, socio-economic development, education, poverty, practices and rituals and water availability adds to the complexity of the task. It is estimated that around 37.7 million Indians are affected by waterborne diseases annually. The government has undertaken various programmes since independence to provide safe drinking water to the rural masses yet there's a long way to go. In this respect the Company may design projects to contribute a hand towards developing source of pure drinking water in rural areas.

e. Working with Elderly Citizens:

The Company may undertake projects or programs or activities for the protection of elderly citizens by establishing, funding or otherwise supporting old age homes and day care facilities including without limitation medical aid, food and accommodation.

f. Skill development:

In a fast growing Indian economy, there is a gap between the supply and demand for trained and skilled resources. In accordance with the Government of India's vision and policy on skill development, the Company would undertake programmes which would enable the youth to acquire employable market-oriented skills and will link them to potential employers, thereby facilitating the development of self-reliant and confident individuals.

g. Promotion and development of traditional arts and handicraft:

India has a great history of arts and handicraft, the Company may set up traditional arts and handicraft vocational centers, gallery and Museums. Further, skills set can be imparted among women for their livelihood and Tribal arts and handicraft would be promoted and sustained for its legacy.

h. Promotion of Sports for the underprivileged group:

Company may open Sports Academy/ Centers for underprivileged children and youth as part of their education and life skills development. It may also provide sports coaching/training to such children/youth as part of their integrated development and livelihood, whether alone or in partnership with experienced and skilled individuals and / or organizations.

i. Environmental sustainability and work for community development project in urban and rural areas

Company may take up projects and programmes that assist in environmental conservation and support ecological sustainability as part of its initiative towards developing a Green India.

6. Governance Structure:

The CSR Governance Structure shall consist of CSR Committee, CSR Steering/Operations Committee and CSR Executive Team which shall consist of the following members.

a. CSR Committee

The CSR Committee shall consist of Mr. Saurabh Gadgil, Mr. Parag Gadgil and Mr. Vidyadhar Gadgil who shall approve the CSR Policy, CSR Budget and CSR projects and programmes in alignment with Section 135 of the Act.

b. CSR Steering / Operations Committee:

The CSR Committee shall consist of Mr. Harendra Godambe (CSR Head), Mr. Ashutosh Joshi (Member), Mr. Prasad Kale (Member), Mr. Anirudha Joshi (Member), Mr. Vinayak Kamath (Member), Ms. Priyanka Vanjari (Member) Ms. Sayalee Yengul (Member) who shall assess Projects / Programmes and allocate budgets as per submission by the CSR Executive Team. They shall further submit the same to the CSR Committee for approval.

c. CSR Executive Team:

The CSR Executive Team shall consist of CSR Head along with Branch Managers and Sales Head of the Company who shall be responsible for execution of CSR projects.

7. Role and Responsibilities of CSR Committee:

The Roles and Responsibilities of the CSR Committee shall consist of the following:

- a. To draft the CSR policy and recommend the same to the Board of Directors (Board) of the Company for approval.
- b. To review and recommend any new CSR initiatives to be taken up by the Company including the selection/appointment of implementation agencies.
- c. To review the progress of CSR projects already undertaken by the Company and the utilization of budgets for each of such projects.
- d. To review and recommend the CSR report to be included in the Board's Report.
- e. To review and recommend any amendments to be made in the CSR Policy of the Company.
- f. To carry such other functions as may be delegated to it by the Board relating to CSR activities of the Company.

8. Budget:

The CSR Committee shall recommend the annual budgeted expenditure (project wise) to the Board for its consideration and approval. For achieving the CSR Objectives through implementation of meaningful & sustainable CSR Programmes, the Company shall allocate in each financial year 2% of the average net profits made

by the Company during the three immediately preceding financial years, as its Annual CSR Budget.

9. Surplus:

Surplus arising out of CSR projects or programs, if any, shall not be part of business profits of the Company and the same shall be utilized for CSR activities in accordance with this Policy.

10. Implementation:

The CSR programs or projects under this Policy will be implemented directly by the Company or indirectly through the following implementing agencies.

- a. Through a Registered Trust or a Registered Society or Section 8 Company, whether or not established by the Company or its holding or subsidiary or associate company; or
- b. In collaboration with other companies; or
- c. Combination of one or more of the above.

In case one or more CSR projects or programs are undertaken in collaboration with implementing agencies, clear demarcation with respect to responsibility, contribution, implementation, monitoring etc. of each of such agencies shall be established.

11. Execution:

Company shall identify suitable programmes for implementation in line with its CSR objectives and also benefit the stakeholders and the community for which those programmes are intended. These programmes would be done through:

- a. Community based organizations whether formal or informal
- b. Voluntary Agencies (NGOs)
- c. Institutes/ Academic Organizations
- d. Trusts, Missions
- e. Self-help Groups
- f. Mahila Mandals/ Samitis
- g. Professional Consultancy Organizations
- h. Corporate with similar CSR Vision

12. Monitoring and Review:

To ensure effective implementation of the CSR programmes undertaken by the Company, a monitoring mechanism will be put in place by the Company. The progress of CSR programmes under implementation will be evaluate and monitored by third part agencies of repute, which shall report to the CSR Head on quarterly basis.

The CSR department at the Corporate Office will conduct impact studies on a periodic basis, through independent professional third parties/professional institutions/individuals, especially with regard to strategic and high budget projects and programmes.

13. Amendment:

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government, from time to time. The Board reserves the right to alter in any manner whole or part of this Policy as and when necessary, subject however to the provisions of the Section 135 of the Act and Rules made thereunder.

14. Reporting:

At the end of each financial year, the CSR Committee shall prepare a CSR Report in the prescribed form relating to the financial year and submit the same to the Board of the Company.