



RBZ JEWELLERS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

[Pursuant to Section 135 of Companies Act, 2013]

RBZ Jewellers Limited

CIN: L36910GJ2008PLC053586

Registered Office:

Block-D, Mondeal Retail Park,
Near Rajpath Club, S.G. Highway,
Beside Iscon Mall,
Ahmedabad, Gujarat-380054, India

RBZ JEWELLERS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. EFFECTIVE DATE

This Policy of the Company is framed in accordance with Section 135 of the Companies Act, 2013 (the “Act”) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time. The Policy lays down the guiding principles, governance framework, and mechanisms for identification, implementation, monitoring, and reporting of CSR activities undertaken by the Company.

2. OBJECTIVE AND APPROACH

RBZ Jewellers Limited (the “Company” or “RBZ”) believes integrate social and environmental concerns in its business operations and interactions with its stakeholders. The Company has always worked toward building trust with all its stakeholders based on the principles of good corporate governance, integrity, equity, transparency, fairness, disclosure, accountability, and commitment to values. The Company will work towards leveraging its expertise for various social causes and encourage its employees for volunteering for CSR program of the Company.

3. CSR ACTIVITIES

The Company shall undertake various CSR activities, projects or programs in India falling within the purview of Schedule VII to the Act, which shall be interpreted liberally as per applicable law. The followings are the broad categories of the activities under which the Company may work to undertake CSR activities as specified under Schedule VII of the Act:

- 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 company can undertake programs for educating the peoples;
- ii. Promoting education, including special education and employment enhancing vocation skills specially among children, women, elderly, and 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 rejuvenation of river Ganga;
- v. Protection of national heritage, art and culture including restoration of building and sites of historical importance and works of art: setting up public libraries; promotion and development of traditional arts 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 Government for socio-economic development and relief and welfare of the Schedule Castes, the scheduled 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;
- xii. disaster management, including relief, rehabilitation and reconstruction activities; and
- xiii. Any other activities as listed in Schedule VII of the Act.

4. CONSTITUTION AND MEETINGS OF CSR COMMITTEE

Pursuant to the provisions of Section 135 and other applicable provisions, if any, of the Act including the rules framed thereunder, the Corporate and Social Responsibility Committee (“**Committee**”) of the Company will be constituted as hereunder:

- i. The Board shall determine the membership of the Committee.
- ii. The Committee shall consist of three or more directors, out of which at least one shall be an independent director.

The Chairman of the CSR Committee will be nominated by the Board of Directors. The CSR Committee shall meet as and when required for effective implementation, monitoring, and review of the CSR activities of the Company.

5. RESPONSIBILITY OF CSR COMMITTEE

- i. Formulate and recommend to the Board an Annual Action Plan in accordance with Rule 5(2) of the Companies (CSR Policy) Rules, 2014.”which shall indicate amongst others, the guiding principles for selection, implementation and monitoring the activities as well as formulation of the annual action plan which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act, as amended and the rules made thereunder and make any revisions therein as and when decided by the Board;
- ii. The Company shall undertake impact assessment of CSR projects, wherever applicable, in accordance with Rule 8(3) of the CSR Rules.” & the Committee shall review and recommend the amount of expenditure to be incurred on the activities referred to in clause (a) and amount to be incurred for such expenditure shall be as per the applicable law;
- iii. Monitor the corporate social responsibility policy of the Company and its implementation from time to time and issuing necessary directions as required for proper implementation and timely completion of the corporate social responsibility programme; and

- iv. Any other matter as the Corporate Social Responsibility Committee may deem appropriate after approval of the Board or as may be directed by the Board from time to time and/or as may be required under applicable law, as and when amended from time to time.

6. CSR SPEND

The CSR Committee shall identify and recommend CSR projects/programs in line with this Policy and the provisions of the Companies Act, 2013. Such projects may be undertaken directly by the Company and/or through eligible implementing agencies registered with the Ministry of Corporate Affairs.

The Company shall, in every financial year, spend at least 2% of the average net profits of the Company made during the three immediately preceding financial years, calculated in accordance with Section 198 of the Companies Act, 2013, towards CSR activities.

Any surplus arising out of CSR activities shall not form part of the business profits of the Company and shall be utilized in accordance with the applicable provisions of the Companies Act, 2013 and the CSR Rules framed thereunder.

Any excess CSR amount spent by the Company may be set off against future CSR obligations in the manner and subject to the conditions prescribed under the applicable provisions of the Companies Act, 2013 and the Rules made thereunder.

In case the Company fails to spend the prescribed CSR amount in any financial year, the Board shall specify the reasons for the same in its Board's Report and comply with the provisions relating to transfer of unspent CSR amount as prescribed under the Act.

The tax treatment of CSR expenditure shall be in accordance with the provisions of the Income Tax Act, 1961 and applicable notifications/circulars issued by the relevant authorities from time to time.

7. ROLE OF BOARD

- i. The Board to satisfy itself that the funds disbursed for any CSR programme or project have been utilized for the purposes and in the manner as approved by it;
- ii. The Chief Financial Officer (CFO) or the person responsible for financial management in the Company shall certify the details of CSR spent is as per Board approval; and
- iii. In case of ongoing project, the Board to monitor the implementation of the project with reference to the approved timelines and year wise allocation.

Explanation: Ongoing project shall mean a multi-year project undertaken by RBZ in fulfillment 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.

8. PRINCIPLE FOR SELECTION, IMPLEMENTATION, MONITORING AND EVALUATION

a) Selection

- i. The selection of CSR Project will be based on approach of the Company that integrates all components by carefully balancing its vision and mission.
- ii. Encourage employees to participate
- iii. Identify Implementing agencies basis various parameters set by the Board.

b) Implementation and monitoring

- a. Real-time reporting and assigning clear responsibility.
- b. Review the plan with actual and take corrective measures, if required.

c) Evaluation

- a. Evaluate cost-benefit and impact of the program when possible.
- b. Report to the Board on analysis.

9. MONITORING MECHANISM

To ensure effective implementation of the CSR programmes undertaken a monitoring mechanism will be put in place by the Company. The progress of CSR programmes under implementation will be reported to Board of Directors on a quarterly basis. The CSR committee will conduct impact studies on a periodic basis, about effectiveness of CSR activity on the society.

10. REPORTING MECHANISM

CSR Committee will obtain feedback from beneficiaries about the programmes and report to the Board of Directors, the feedback received from the beneficiaries of CSR activity. Appropriate documentation of Company's CSR Policy, annual CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis and the same will be available on the website of the Company. CSR initiatives of the Company will also be reported in the Annual Report of the Company containing particulars as specified in the CSR Rules.

11. SURPLUS OF CSR PROJECTS

In line with the guidelines provided under the Act surpluses, if any, arising out of the projects or programs or activities shall not form part of the business profit of RBZ.

12. DISCLOSURE

The Board shall disclose the composition of CSR committee and this Policy and projects approved by the Board on the website.

13. CONTACT

The Compliance Officer can be contacted for any queries regarding the Policy. Email address is cs@rbzjewellers.com. In the event of any inconsistency between this Policy and the applicable laws, the applicable laws will prevail.

14. AMENDMENT TO THE POLICY

The Board on its own and/ or as per the recommendations of CSR Committee can amend this Policy, as and when required. Any or all provisions of the Policy would be subject to revision/amendment in accordance with the provisions of the Act thereunder on the subject, from time to time.

Version No.	Approving Authority	Issue/Review Date
1.	Board of Directors	16th June 2023
2.	Board of Directors	14th May 2026
