

SUNJEWELS PRIVATE LIMITED

Corporate Social Responsibility (CSR) Policy

1. CONTEXT

Sunjewels Private Limited ('Sunjewels' or the 'Company') (formerly known as Eleganza Jewellery Private Limited) has for several years undertaken various Corporate Social Responsibility ('CSR') initiatives.

Sunjewels has been working towards reducing malnutrition, improving health-care, promoting education and protecting National Heritage, Art and Culture. The Company's focus has always been to contribute towards sustainable development of the Society.

2. OBJECTIVES

Sunjewels' s CSR Policy intends to:

- Strive for economic development in such a manner that it positively impacts the Society at large;
- Embrace responsibility for the Company's actions and encourage a positive impact through its activities on eradicating hunger, poverty, malnutrition, promoting health care, for the Society.

3. FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013, Sunjewels CSR activities will focus on:

3.1) Hunger, poverty, malnutrition and promoting health care

3.2) Promoting education

3.3) Protecting national heritage, art and culture

3.4) Women empowerment

3.5) Environment protection and natural resources conservation

3.6) Animal welfare

3.7) Rural sports promotion & nationally recognised sports

3.8) Socio-economic development of schedule casts and tribes, other backward classes, minorities and women

3.9) Rural development programs

3.10) Slum area development (for any area declared as such by the Central Government or any State Government or any other competent authority under any law).

3.11) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government including Contribution to the Clean Ganga Fund set up by the central Government for rejuvenation of river Ganga and Contribution to the Swachh Bharat Kosh set up by the central Government for the promotion of sanitation and making available safe drinking water.

4. UNDERTAKING CSR ACTIVITIES

Sunjewels will undertake its CSR activities, approved by the CSR Committee, through such entity/organization as approved by the CSR Committee or the person(s) so authorised by the Committee.

The CSR committee will decide on the locations for CSR activities.

5. COMPOSITION OF CSR COMMITTEE

The CSR Committee shall consist of the following directors:

- Mr. Shishir Nevatia
- Mr. Kapil Nevatia
- Mr. Neeraj Nevatia

6. RESPONSIBILITIES OF THE COMMITTEE

The responsibilities of the CSR Committee include:

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken
- Recommending modalities of execution and implementation schedule for CSR activities
- Recommending the amount of expenditure to be incurred on the CSR activities in India.
- Monitoring CSR activities from time to time

7. GOVERNANCE

The Company through a registered trust or a Registered Society / Company, of its own or associate company or others, or directly through Company personnel can undertake CSR activities as per the provisions of the Companies Act. 2013, and relevant rules, as amended, up to date, who will work closely with and support the Board and the CSR Committee in implementing CSR activities of the Company. They will assist the CSR Committee in identifying the areas of CSR activities, programs and execution of initiatives as per defined guidelines and 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. The Company may also decide to undertake CSR activities by collaborating with other companies. The Company may also take help of any implementing agencies in this regard.

8. FUNDING, SELECTION AND MONITORING PROCESS

The CSR Committee will receive requests for funding of projects throughout the year, which would evaluate proposals so received and projects will be prioritized by assessing their impact. The CSR Committee will deliberate on the proposals and approve proposals for implementation at its discretion.

The CSR Committee may also take up other areas for CSR activities, other than those specifically referred to herein before in case it so deems fit.

The CSR Committee will collaborate with stakeholders to monitor the status of each project and will report to the Board periodically.

The CSR Committee shall ensure that the surplus arising out of the CSR projects or programs or activities, if any, shall not form part of the business profit of the Company but it is utilised only for CSR activities.

9. INFORMATION DISSEMINATION

The Company's engagement in this domain will be disseminated on its web-site and in its Annual Reports.

! Only Member of the Board of Directors can be a member of the Committee.