

Kosha

Fine Jewels Ltd.
(Formerly known as Kosha Fine Jewels Pvt. Ltd.)

CORPORATE SOCIAL RESPONSIBILITY POLICY

This document outlines the Corporate Social Responsibility (CSR) Policy of Kosha Fine Jewels limited (Formerly known as Kosha Fine Jewels Private Limited) ("The Company"). The initiatives taken by the Company as part of Corporate Social Responsibility (CSR) programs effectively contribute to developing a sustainable and resilient community. Hence, this policy document largely articulates the existing CSR policy of the Company in practice and makes it more congruent with the framework provided by the Section 135 of the Companies Act, 2013.

1. Title of the policy

This policy, incorporating the philosophy, guidelines and mechanism of the Company for undertaking social and economic measures for the welfare and sustainable development of the Indian society, is titled as the '**Kosha Fine Jewels Limited CSR Policy**'.

2. Applicability/scope

This Policy shall apply to all Corporate Social Responsibility (CSR) initiatives and activities undertaken by the Company, directly or indirectly, at its various work centres, offices, plants, and operational locations, as well as in other identified areas across rural and urban regions of India.

The focus of such activities shall be to promote inclusive growth and sustainable development, with particular emphasis on the marginalized, underprivileged, and economically weaker sections of society.

3. Objectives

The main objective of CSR policy is to lay down guidelines for the Company to make CSR as one of the key focus areas to make a positive contribution to society through high impact, sustainable programs.

The Company will act as a good Corporate Citizen, subscribing to the principles of Corporate Social Responsibility for implementation.

Setting up deeper sustainable institutional projects for the long-term welfare of the nation.



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4. Definitions

(1) "Act" means the Companies Act, 2013;

(2) "Administrative overheads" means the expenses incurred by the company for 'general management and administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;

(3) "Annexure" means the Annexure appended to these rules;

(4) "Corporate Social Responsibility (CSR)" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in these rules, but shall not include the following, namely: -

(i) activities undertaken in pursuance of normal course of business of the company:

Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that:

(a) such research and development activities shall be carried out in collaboration with any of the institutes or organizations mentioned in item (ix) of Schedule VII to the Act;

(b) details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report;

(ii) any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;

(iii) contribution of any amount directly or indirectly to any political party under section 182 of the Act;

(iv) activities benefitting employees of the company as defined in clause (k) of section 2



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- of the Code on Wages, 2019 (29 of 2019);
- (v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India;
- (5) “CSR Committee” means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act;
- (6) “CSR Policy” means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;
- (7) “International Organisation” means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply;
- (8) “Net profit” means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:
- (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: Provided that in case of a foreign company covered under these rules, net profit means the net profit of such company as per profit and loss account prepared in terms of clause (a) of sub-section (1) of section 381, read with section 198 of the Act;
- (9) “Implementing Agency” means an implementing agency as defined under paragraph VIII (vii)
- (10) Ongoing Project” means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial



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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;

(11) "Public Authority" means 'Public Authority' as defined in clause (h) of section 2 of the Right to Information Act, 2005 (22 of 2005);

(12) "Section" means a section of the Act.

(13) Words and expressions used and not defined in these rules but defined in the Act shall have the same meanings respectively assigned to them in the Act.

5. CSR Governance

5.1. Governance mechanism

The Company has established an accountable, robust and transparent governing mechanism to manage the operation under its CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

5.2. Corporate Social Responsibility Committee

As the CSR obligation of the Company does not exceed ₹50 lakhs during the financial year, in accordance with Rule 5(1) of the Companies (Corporate Social Responsibility Policy) Rules, 2014, the Company is not required to constitute a separate CSR Committee.

Accordingly, the Board of Directors shall discharge all the functions of the CSR Committee, including formulation, approval, implementation, and monitoring of CSR projects or activities, in compliance with the provisions of Section 135 of the Companies Act, 2013 and the applicable CSR Rules.

The CSR initiatives shall focus on areas within and around the Company's operational locations ensuring that all CSR activities are aligned with the Company's CSR Policy and contribute to sustainable and inclusive growth.



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5.3. Powers and duties of the Board of Director

- 5.3.1. Board of Director will formulate, review, revise and update the Company's CSR Policy, which will be approved by the Board of the Company. Board of Director will suggest strategies, focus and areas of intervention and operation to the Board as per requirement.
 - 5.3.2. Board of Director will initiate internal process to develop an Annual Action Plan and Budget (AAPB) in consultation with the implementing bodies to develop a CSR plan and also modify and finalize the same after Board approval, where required.
 - 5.3.3. The Board of Director will then entrust the responsibility of the execution of the CSR Plan within the specified budgets and time-frames to such persons or bodies, as it may deem fit.
 - 5.3.4. Board of Director shall put internal monitoring mechanisms in place to track the progress of each project and monitor, review and evaluate the operations of the CSR Programmes at such frequency as it may deem fit to ensure orderly and efficient implementation of the CSR Programmes in accordance with the CSR Policy.
 - 5.3.5. Board of Director shall carry out external and independent assessment to review quality of process, project measures and impact at different stages of implementation, as it may deem fit.
 - 5.3.6. Board of Director shall meet at **least once** a year to review the progress made by various persons and bodies, which are assigned task of implementation of CSR work.
6. At the end of every financial year, all entrusted bodies will submit annual report to the Board of Director, which in turn collate and present before the Board. Planning, Strategies and implementation of CSR Programmes



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6.1. Outreach strategy and principles

6.1.1.1. CSR Activity for building model of district development:

Kosha Fine Jewels limited (Formerly known as Kosha Fine Jewels Private Limited) will continue to work in the areas, which are currently adopted by SK Group Foundation or will be adopted through Board of Director approval in the future under backward district development approach. Here emphasis will be on evolving and establishing replicable, sustainable models of development.

6.1.1.2. CSR Activity near the Company operations:

Developmental work in the areas adjacent to the manufacturing plants, work-sites or factories of Kosha Fine Jewels Limited (Formerly known as Kosha Fine Jewels Private Limited) will be taken up. The size and scale of the operations will be decided according to the strategic needs and the situation of the locations through the Board of Director approval mechanism. In this kind of CSR operations, aim will be to develop a replicable CSR model of engagement for areas near work-sites.

6.1.1.3. CSR activity within the Company:

CSR work will be initiated within the Company among the employees through awareness generation for volunteering, staff contributions and payroll contribution for social causes, crisis and issues. This CSR operation will aim at increasing commitment of the employees for social causes and develop and nurture socially-responsible work-culture and environment within the Company.

6.2. Project-based Approach

Kosha Fine Jewels Limited (Formerly known as Kosha Fine Jewels Private Limited) will follow a project-based accountability approach to stress on the long-term sustainability of CSR projects, where its project design will have at least the following components:

- a) Objectives,
- b) Time frame,



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- c) Implementation strategy,
- d) Action Plan,
- e) Monitoring and Impact indicators,
- f) Monitoring, Evaluation and Impact Assessment plan,
- g) Documentation and communication plan and
- h) Sustainability and exit plan.

7. Budgeting, Resource Allocation and Disbursement

7.1. Definition of CSR Expenditure

- 7.1.1. CSR expenditure will include all the expenditures, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan.
- 7.1.2. Moreover, any surplus arising from any CSR Programmes shall be used for CSR. Accordingly, any income, surplus or reserves arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

7.2. Approvals and disbursement

- 7.2.1. The Board of Director will be the highest body to approve and disburse funds under the annual budget approved by the Board.
- 7.2.2. However, Board of Director may delegate authority for approval to different bodies or persons at various levels and areas as it may deem fit for smooth and efficient fund flows to achieve maximum possible effectiveness in implementation.



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8. Review and Revision of the Policy

- 8.1. In case of any doubt with regard to any provision of the Policy and also in respect of matters not covered herein, a reference to be made to Corporate CSR Department. In all such matters, the interpretation and decision of the BOARD OF DIRECTORS shall be final.
- 8.2. 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.
- 8.3. The Company reserves the right to modify, cancel, add, or amend any of these Rules within the framework of relevant and applicable laws.

9. Reporting and Documentation

9.1. Internal Reporting

Board of Director will establish mechanism for regular, timely reporting of implementing bodies at different levels and maintain real time dash-board to keep abreast of the status of each CSR programme.

9.2. Documentation Mechanism and Plan

Apart from earmarking percentage of budget for documentation of best practices, learning, process and impacts of each programme, efforts will be made to build in-house competency and mechanism of development communication for brand-building and visibility.

9.3. Compliance Reporting

Mechanism will be established to disclose relevant and required information in line with the CSR reporting guidelines. Efforts will be made to go beyond compliance and achieve GRI standards of reporting.



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For Kosha Fine Jewels Limited
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V. N. Kothari
Viral Navinchandra Kothari
Managing Director
DIN: 09011478



Place: Mumbai
Date: 22/09/2025

This CSR Policy was approved by the Board of Directors of Kosha Fine Jewels Limited (Formerly known as Kosha Fine Jewels Private Limited) at its meeting held on 22nd September 2025