

GIA India Corporate Social Responsibility Policy

1. Preamble

Corporate Social Responsibility (“CSR”) is an organisation’s commitment to operate in an economically, socially and environmentally sustainable manner, while recognising the interests of its stakeholders. This commitment is beyond statutory requirements. CSR is, therefore, closely linked with the practice of sustainable development. CSR extends beyond philanthropic activities and reaches out to the integration of social and business goals. These activities are recognised as those which would, in the long term, help secure a sustainable competitive advantage.

2. Background

GIA India Laboratory, Pvt. Ltd. (“GIA India”, “We”) is engaged in the business of grading diamonds. GIA India has operations in Surat, Gujarat, a major cutting and polishing centre, that provides grading and education services and a branch in Dubai that is an intake window for stones and promotes gem and jewellery education.

3. Scope and Objectives

In order to carry out the charitable activities in a structured manner and to streamline and provide more focus and direction to the activities undertaken by GIA India in its sphere, we have formulated a CSR Policy. Further, Section 135 of the Companies Act, 2013 (hereinafter described as “Section 135” of “the Act”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter described as “the Rules”) have also provided guidelines for a CSR Programme for the companies meeting the criteria of mandatory provision for CSR with a net profit of rupees five crores or more during a financial year.

This CSR Policy is formulated in line with the requirements of the Companies Act, 2013 and shall be applied on uniform basis.

4. Corporate Social Responsibility Committee (“CSR Committee”)

GIA India constituted a CSR Committee vide circular resolution passed by the Board of Directors on 8th December, 2014, which is comprised of the following directors:

4.1.1. Mr. David Tearle, Chairman

4.1.2. Mr. Thomas Moses, Member

4.1.3. Ms. Nirupa Bhatt, Member

4.1.4. Ms. Susan Jacques, Member

4.1.5. Company Secretary shall act as Secretary to the CSR Committee

4.2. The CSR Committee is entrusted, inter alia, with the following tasks:

- 4.2.1. To formulate and recommend to the Board of Directors, a CSR Policy which shall indicate the activities to be undertaken by GIA India as per the Companies Act, 2013;
- 4.2.2. To review and recommend the amount of expenditure to be incurred on the activities to be undertaken;
- 4.2.3. To monitor the CSR Policy from time to time;
- 4.2.4. Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.
- 4.2.5. This CSR Policy has been formulated and recommended by the CSR Committee pursuant to the provisions of Section 135(3)(a) of the Act, Schedule VII of the Act and the rules made thereunder.

5. Activities To Be Undertaken

GIA India shall undertake one or more of the following activities from time to time:

- 5.1. Eradicating hunger, poverty and malnutrition; promoting healthcare, including preventive healthcare and sanitation; making safe drinking water available; improving maternal health and reducing child mortality.
- 5.2. Spreading awareness about lifestyle choices to prevent diseases such as diabetes, cardiac and respiratory diseases, and other disorders.
- 5.3. Partnering with organizations that volunteer to detect and prevent chronic diseases by conducting medical camps and other activities.
- 5.4. Providing assistance to the underprivileged to prevent diseases.
- 5.5. Collaborating with governmental and non-governmental organizations to organize various camps.
- 5.6. Making safe drinking water easily accessible to prevent water-borne diseases, and to supply and repair hand pumps in rural areas.
- 5.7. Assisting the underprivileged by providing financial assistance.
- 5.8. Promoting education, including special education, and employment enhancing vocation skills, especially among the elderly, women and children and those differently-abled.
- 5.9. Creating livelihood enhancement projects.
- 5.10. Partnering with institutions to provide education to underprivileged communities, students that are visually impaired or disabled, and to provide supplementary nutrition, immunization, and hostel facilities.
- 5.11. Adoption of government schools and/or providing financial assistance to schools, colleges, universities, libraries, reading rooms, laboratories, research and institutions similar in nature in India for the use of the students and staff and for the development and advancement of education and diffusion of knowledge amongst the public in general.

- 5.12. Extending support and educational assistance to children from financially challenged families and underprivileged communities.
- 5.13. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up homes for the elderly, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically challenged groups.
- 5.14. Activities preventing discrimination of female children and promoting female education and employment.
- 5.15. Activities empowering women and providing health care for pregnant women.
- 5.16. Supporting homes for the elderly and orphanages.
- 5.17. Forming co-operative societies and self-help groups to provide work to the unemployed and aiding the societies and groups.
- 5.18. Measures benefiting the veterans of the armed forces, war widows and their dependents.
- 5.19. Providing relief to Army, Navy and Air Force personnel and their families affected by war or war-like operations.
- 5.20. Disaster Relief
 - 5.20.1. Providing disaster relief to those by affected by natural disasters such as cyclones, drought, earthquakes, floods, fires, etc.
 - 5.20.2. Providing relief to those affected by lighting, accidents, civil unrest and riots.
- 5.21. Providing employment enhancing vocational skills.
- 5.22. Supporting social business projects.
- 5.23. Creating rural development projects.
- 5.24. Promoting sports.
- 5.25. Contributing to the Prime Minister's National Relief Fund or any other fund set up by the central government or state governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other challenged classes, minorities and women.

6. Activities Will Not Include

- 6.1. Activities undertaken by GIA India in its normal course of business.
- 6.2. Projects, programs or activities not in conformity or not in line with activities mentioned above.
- 6.3. Projects, programs, or activities that benefit only the employees of GIA India and their families.
- 6.4. Programs and activities related to a political party.

- 6.5. Activities as obligation or for fulfilment of any requirements under an Act or Statute or Regulations (e.g., labour laws, Land Acquisition Act, etc.) the Act (Section 135) or the Rules.
- 6.6. One-off events (e.g., marathons, awards, charitable contributions, advertisements, sponsorships of television programs, etc.).

7. Execution and Methodology

CSR activities can be accomplished through a trust or registered society or company established by GIA India – or its holding or subsidiary company. If such a trust is not established by GIA India or its holding or subsidiary company, it shall maintain 3 years of recorded activities undertaking similar projects. CSR Committee will conduct a compliance review prior distribution of funds.

7.1. Territory for CSR Spend

Preference will be given to the local area and areas around the project sites, registered office, branch offices and administration offices of GIA India for spending the budgeted amount for CSR activities. The activities will be restricted to the geographical boundaries of India.

7.2. CSR Budget

7.2.1. The expenditure amount for CSR and the projects, programs and activities undertaken in each financial year will be recommended by the CSR Committee and will be approved by the Board of Directors with or without modification in their first meeting held in each financial year.

7.2.2. If in any financial year GIA India does not spend the budgeted amount, due to any reason whatsoever, the unutilized amount will be carried forward and added to the CSR budget of the next financial year.

7.3. CSR Monitoring and Reporting Mechanism

7.3.1. The CSR Committee shall monitor the amount of expenditure as approved by the Board of Directors.

7.3.2. The CSR Committee will provide the Board of Directors a report that will include an annual report on CSR activities in the prescribed format.

7.3.3. The approved CSR Policy shall be displayed on GIA India's website, if any.

7.4. Validity and Authority for Modification/Amendments

This CSR Policy shall be effective beginning March 19, 2019, and will be in force until such time that it is modified or amended by the Board of Directors on recommendation of the CSR Committee.

7.5. Policy Amendments

The Board of Directors may amend this Policy from time to time as warranted and as recommended by the CSR Committee.



8. Related Regulations

8.1. Companies Act, 2013, Section 135

8.2. Companies (Corporate Social Responsibility Policy) Rules, 2014

9. Revision History

| Revision Date | Description | Approved By |
|---------------|-----------------|--------------------|
| 03/19/2019 | Initial release | Board of Directors |