

## PC JEWELLER LIMITED

### BUSINESS RESPONSIBILITY POLICY

#### 1. SCOPE AND PURPOSE

Regulation 34(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR Regulations**”) with effect from financial year 2022-23 has made reporting of Business Responsibility and Sustainability Report in Annual Report mandatory, for the top 1000 listed companies based on market capitalization (calculated as on the 31st day of March of every financial year). PC Jeweller Limited (the “**Company**”) being one of the top 1000 listed companies, has approved and adopted Business Responsibility Policy (**'BR Policy'** or **'Policy'**) in its Board meeting held on February 14, 2023.

This Policy has been framed in line with the suggested framework as provided by the SEBI based on the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (“**NVGs**”) published by the Ministry of Corporate Affairs and is intended to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and economical responsibilities.

BR Policy endorses the Company's commitment to follow principles laid down in the NVGs published by the Ministry of Corporate Affairs towards conducting its business.

#### 2. APPLICABILITY

The Policy is applicable to all the Directors and employees of the Company and shall be effective from March 15, 2023.

#### 3. IMPLEMENTATION OF THE POLICY

The Board of Directors shall be responsible for implementation of BR Policy. Shri Ramesh Kumar Sharma, Executive Director is designated as Business Responsibility Head for the purpose of this Policy.

Business Responsibility Head may take support of such functional heads and other internal and external experts, as he may deems fit, for the effective implementation of the Policy.

#### 4. POLICY

The Company believes that the business excellence can be achieved only by doing business on sound sustainability principles that address the dimension of good governance as well as environmental and social responsibility. The policies / principles are generally embedded in the day-to-day business operations of the Company and are implemented at management levels or through implementing agencies. The Company's business practices are governed by the following guiding principles:

##### ➤ **PRINCIPLE 1: ETHICS, TRANSPARENCY AND ACCOUNTABILITY**

The Company maintains highest standards of ethics while conducting the business activities. The Board of Directors and Senior Management strive and endeavor to set necessary governance

structures, procedures and practices to ensure ethical conduct at all levels across the Company. The management aims at inculcating ethical behaviour by transparently communicating and allowing access to information about the decisions that impact relevant stakeholders.

The Company will ensure that the disclosures made in business documents, statutory filings, declarations etc. are true and correct. The Company has in place policies like Whistle Blower Policy, Code of Conduct for Directors and Senior Management etc. to ensure ethics and good governance. The Company shall ensure that while conducting its business and dealing with the customers and other stakeholders it shall not engage in practices that are abusive, corrupt, or anti-competition. The Company shall avoid, to the extent possible involvement in practices, either by itself or by any third party that are in violation of the Policy.

The Company have a zero tolerance for bribery and corruption in its business dealings. The employees of the Company shall not, directly or indirectly, solicit or accept any commission or any form of benefit arising out of a transaction involving the Company which might be extended at times to influence business decisions. Any offer or grant of gift customary and / or are of a commemorative nature is not covered under the Policy.

#### ➤ **PRINCIPLE 2: SAFETY AND SUSTAINABILITY OF GOODS**

The Company is engaged in the business of manufacturing, sale and trading of jewellery, which is safe for use and do not cause any harm to the customers. Jewellery is a recyclable product and India has a tradition of recycling of old jewellery. The Company also encourages this practice and often runs incentive schemes for the customers for exchanging their old jewellery with new jewellery.

To promote sustainable consumption, the Company shall strive to minimize wastage and recycle resources, wherever possible. The Company will strive to continuously review and improve its manufacturing process so as to increase the productivity with reduced usage of resources without any compromise on the quality of the product.

The Company shall ensure that its jewellery comply with all applicable standards. The social, environmental and economic factors, wherever applicable, shall be taken into account while conducting its business.

#### ➤ **PRINCIPLE 3: WELLBEING OF ALL EMPLOYEES**

The Company always recognises that its principal asset is its employees and they are the fundamental drivers of its growth. The Company believes in establishing and building a strong performance and competency driven culture amongst its employees and is always determined for their betterment and welfare.

The Company shall refrain from employing child labour, forced labour or any form of involuntary labour, paid or unpaid. The Company shall advocate a business environment that favours the concept of equal employment opportunities both at the time of recruitment as well as during the course of employment for all without any discrimination with respect to caste, creed, gender, race, religion, disability or sexual orientation.

The Company shall promote work-life balance among its employees. The Company shall provide a workplace environment that is hygienic, humane, comfortable, facilitating, harassment free and which upholds the dignity of the employees and where employees feel safe and secure in discharging their responsibilities. It shall provide facilities for the well-being of the employees including those with special needs. The Company has in place policies like Whistle Blower Policy, Policy against Sexual Harassment etc. which ensure a safe work environment to all its employees.

The Company will conduct programs / meets, as and when required, for enhancing / upgrading the skills and competencies of its employees through various programs including induction / orientation and on the job training or training through various internal or external programmes. The Company shall have effective system for attracting and retaining talents including awards, recognitions, appraisals, mentoring, training and career development.

➤ **PRINCIPLE 4: PROTECTION OF STAKEHOLDERS INTEREST**

The Company values the support of its stakeholders and endeavours to maintain a cordial relationship and safeguard the interests of not only its shareholders and employees, but all the stakeholders. The Company shall regularly identify its internal stakeholders i.e. employees and external stakeholders i.e. shareholders / investors, suppliers (vendors), customers etc. The Company will continue to do so to ensure that the concerns of all the stakeholders are addressed.

The Company acknowledges the responsibility and strives to be transparent about the impact of the policies, decisions, products and associated operations on the stakeholders. The Company shall ensure, while formulating any policy, that the interests of the stakeholders are not compromised. While conducting business, if the Company comes across stakeholders in underdeveloped areas, special attention will be given to such stakeholders in ensuring their well-being. The Company has in place a Corporate Social Responsibility Policy, which lays down the guidelines and mechanism for undertaking socially useful programs for welfare and sustainable development of the community.

➤ **PRINCIPLE 5: RESPECTING AND PROMOTING HUMAN RIGHTS**

The Company is always committed to protect and safeguard the human rights as well as conduct its business with honesty, integrity and ethics. It acknowledges the importance of human rights and discourages practices of child labour, forced labour and sexual harassment etc.

The Company shall recognize and respect the human rights of all relevant stakeholders, including that of its customers, investors and the public at large. The principles of human rights will be integrated in the management systems, in particular by way of assessing and managing human rights impacts of operations and ensuring all individuals impacted by the business have access to grievance mechanisms. The Company has in place policies like Codes of Conduct, Whistle Blower Policy, Policy against Sexual Harassment etc. for protecting and promoting human rights.

➤ **PRINCIPLE 6: RESPECTING AND PROTECTING THE ENVIRONMENT**

The Company understands its responsibility towards the environment and committed towards utilizing natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste. The Company's product (jewellery) is of recyclable nature and do not cause any harm to the environment.

The Company shall strive constantly to improve environmental performance by promoting use of energy efficient and environment friendly technologies and use of renewable energy, wherever possible, encouraging its employees to avoid wastage of papers, water etc.

➤ **PRINCIPLE 7: RESPONSIBILITY TOWARDS PUBLIC AND REGULATORY POLICY**

The Company recognizes that it operates within the specified legislative and policy frameworks prescribed by the Government, and hence considers its responsibility to ensure that if it has to pursue policy advocacy, it shall perform in a transparent and responsible manner while engaging with all the authorities and shall take into consideration the Company's as well as the larger national / industry interest.

The Company shall strive to engage with the Government and be a part of various chambers and associations to make recommendations / representations before regulators and associations for advancement and improvement of the industry it does business. The executives of the Company shall strive to participate and play an active role in committees, associations etc. constituted for industry reforms and advancement.

The Company shall in case of any grievance with any legislative / regulatory authority or framework, seek redressal of the same and resort to policy advocacy consistent with the principles and policies contained in the policy through the trade and industry chambers and other such collective platforms related to the product of the Company.

➤ **PRINCIPLE 8: INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT**

The Company considers the society as its integral part and believes that it cannot work in isolation without society and therefore, as it develops, the society should also progress. The Company is committed towards minimizing the negative impact on society, if any, being created by the Company in the course of its business. The Company therefore through its CSR and other related activities shall continue to participate in the activities for the growth and development of the society.

➤ **PRINCIPLE 9: ENGAGING AND ENRICHING CUSTOMER VALUE**

The Company acknowledges that no business can survive in the absence of customers. The Company being customer centric organization, works very closely with the need and choices of its customers and keeps their demands, culture and purchasing preferences in mind. The Company shall continuously strive to provide goods to its customers in a manner that creates value for both. The Company shall ensure that in serving the needs of the customers, it would not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its product.

The Company ensures that its product displays all the information mandated by the applicable laws. The product pricing and other terms and condition of sale are also transparent and are clearly explained to the customers at the time of sale.

The Company will ensure promotion and advertisements of its product do not mislead or confuse the customers or violate any of the principles in these policies. The Company will provide adequate mechanisms to address customer concerns and take their feedbacks.

**5. AMENDMENTS**

This Policy shall be subject to review as may be deemed necessary by the Board of Directors.

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