

NITTA GELATIN INDIA LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Dated:

1.0 Reflections

Nitta Gelatin India Ltd., (hereinafter referred as **"the Company"**) had its origin in a small hamlet Kathikudam, Koratty , Trichur District in the year 1975 . The village at that time had only very minimal facilities for transportation and communication. With the upcoming and growth of the Company, the surrounding areas had also developed, in addition to giving direct and indirect employment to residents of the area. The management of the company was not seen wanting in interacting with the neighborhood, be it providing library and reading facilities, medical facilities and education support for the children etc. In short, the company had been behaving as a responsible corporate citizen since its inception, understanding fairly well that the development of the village where the first ever manufacturing plant had come up, was integral to the growth and prosperity of company. This occurred during the period when CSR as a concept was not even thought about in the corporate parlance.

But major efforts in the direction of CSR took place simultaneous to the establishment of a public charitable trust, K T Chandy Seichi Nitta Foundation in the year 2010 to commemorate the memory of the forerunners Mr. K T Chandy and Mr. Seichi Nitta who handed down the mantle which see KCPL , now NGIL exist as a company giving direct and indirect employment to many and also serving the society as a corporate citizen.

2.0 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 the Company in its sphere, it is decided to formulate a policy on Corporate Social Responsibility (hereinafter described as **"the Policy"**). This policy has been prepared in line with the requirements of the Companies Act, 2013 (hereinafter described as **"the Act"**).



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3.0 Applicability

This policy will apply to the organisation as a whole, including both divisions (Aroor Unit included) and Registered Office of the company.

4.0 Compliance to Section 135 of the Companies Act, 2013

Section 135 of the Companies Act, 2013 (hereinafter described as “**Section 135**”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter described as “**the rules**”) lays down the guidelines to be followed by companies incorporated under the Act while developing their CSR programme.

Section 135 and the rules are applicable to the Company by virtue of crossing a net worth of rupees one hundred crore and a net profit of rupees five crore during a financial year.

5.0 CSR Committee.

The company at its Board Meeting dated 11th July, 2014, constituted a CSR committee (hereinafter referred to as ‘**Committee**’) consisting of following Directors.

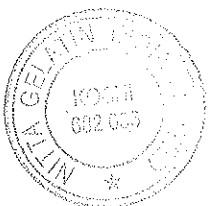
- (i) Mr. K.L. Kumar, Chairman
- (ii) Mr. A.K. Nair, Member
- (iii) Mr. Sajiv K. Menon, Member

The committee shall oversee the following:

- (a) Formulate a policy for CSR activities.
- (b) Specify the modalities of execution of programmes and projects, implementation schedules, and monitoring process.
- (c) Taking stock of the implementation as aforesaid.

6.0 The CSR Policy.

The CSR policy once approved by the committee, and then the Board of Directors, shall act as a guideline and a framework for approving schemes under the policy, and their execution, monitoring and completion.



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In doing so, this policy is formulated for recommendation by the Committee pursuant to the provisions of Section 135(3)(a) and Schedule VII of the Act read with corresponding Rules.

7.0 The CSR Budget

The amount of expenditure to be spent for CSR and the projects, programmes or activities undertaken in each financial year will be recommended by the Committee which will be approved by the Board of Directors with or without modification at the succeeding Board Meeting. Thereafter, the committee to prescribe the modalities of execution of programmes and projects together with implementation schedules and monitoring process. The Committee to further control implementation as per definite time schedule and cost structure.

Surplus, if any, arising out of the CSR Projects/programmes shall not form part of the business profits of the Company

8.0 Territory for CSR spend

The Company shall give preference to the local area and areas around the divisions / units / corporate office of the Company for spending the amount earmarked for CSR activities. The activities will be restricted to the geographical boundaries of India.

9.0 Areas of activities to be undertaken.

The activities will be executed directly or through K T Chandy – Seichi Nitta Foundation or such other trust, non – profit company, society, NGOs, Institutions and Agencies of the Government, Local bodies, as CSR Committee may from time to time approve on recommendation by the Committee.

The Company shall be undertaking activities in the following areas as much as they are in consonance with the objects of K T Chandy – Seichi Nitta Foundation or such other agencies through the medium whereof the activities are undertaken from time to time.

9.1 Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water

- a. Participating in the mid-day meal programs, providing financial assistance to orphanages, old age homes, child welfare organizations etc. for purchase of cereals, grocery, pulses etc. for providing nutritional food to the children and inmates.
- b. To spread awareness about the life style to be followed to prevent disease like diabetes, cardiac and respiratory diseases and lifestyle disorders.

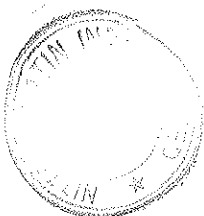


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- c. Promoting camps against use of alcohol, smoking, drug abuse etc.
- d. Awareness campaign for organ donation
- e. Partnering with organizations which volunteer for detection and prevention of chronic diseases, by conducting medical camps and other activities.
- f. To associate with schools, self-help groups, old age homes in setting up sanitation facilities and safe drinking water.
- g. To assist in installation of water purifiers, pumps and digging / renovation of wells in villages, townships, rural areas etc.
- h. To provide all assistance to poor people to prevent diseases.
- i. Any other projects related to the above.

9.2 Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects

- a. To provide Education Kit comprising study material, uniforms etc. to the poor students of Govt. Schools.
- b. Adoption of Govt. Schools and / or providing financial assistance to set up various infrastructure facilities.
- c. To provide financial assistance to promote vocation skills among children, women, elderly and differently abled people.
- d. To extend support /educational assistance to children from financially backward families and underprivileged community as part of the company's social responsibility.
- e. To provide cash awards, scholarships to students studying in School / Colleges and has secured high academic / professional records.
- f. Selection and award for best teacher(s) to commemorate Teachers' Day celebrations or other such celebrations/ occasions.
- g. Special Training , like exam preparation, personality development, career planning and assistance
- h. Psychological counseling or other such counseling and special coaching class for those who those who have difficulty in coping with day-to-day problems in life/ who are back ward in studies
- i. Financial assistance for Ekal vidyalayam in remote area
- j. Any other projects related to the above.



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9.3 Promoting gender equality, empowering women, setting up homes and hostels for omen and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups

- a. Activities to prevent discrimination of girl child and promote girl education and employment.
- b. Activities for women empowerment and health care of pregnant women.
- c. Support old age homes.
- d. Support orphanages.
- e. Any other project related to the above.

9.4 Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water

- a. In Association with various local authorities, as part of promotion of green environment, conduct awareness programs / distribute reusable recyclable carry Bags to various households.
- b. To provide all support for encouraging organic farming
- c. To provide financial assistance to local museums, heritage centers for upholding the heritage value.
- d. To set up public libraries in association with local authorities in rural areas.
- e. Any other projects related to the above.

9.5 Measures for the benefit of armed forces veterans, war widows and their dependents

Any project related to the above.

9.6 Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports

- a. To provide financial assistance to centers engaged in promoting sports / providing training to promote rural sports, nationally recognized sports and Olympic sports.
- b. Any other projects connected related to the above

9.7 Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Schedules Castes, the Scheduled Tribes, other backward classes, minorities and women

Any activity related to the above.



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9.8 Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.

- a. To provide financial assistance to labs & R & D centers situated at institutions of national excellence and other academic institutions which are approved by the Central Government.
- b. Any other activity related to the above

9.9 Rural Development projects ,infra creation, Roads, street lighting etc

- a. To carry out or provide financial assistance to various rural development projects in association with local bodies.
- b. Financial assistance for roads in Panchayats abutting the production units of the company
- c. Ensuring uninterrupted lighting in areas surrounding the divisions of the company, and promote the solar lights in Panchayat areas.
- d. Promote sanitary hiegene by constructions of toilets in public places etc..
- e. Distribution of tools for execution of works outlined hereinabove.
- f. Any other project related to the above.

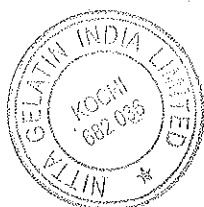
10. Activities not to be counted as CSR by the Company.

The following are the general exclusions

- a. Any amount of expenditure on an item not in conformity or not in line with activities mentioned in the sub-clauses 9.1 to 9.9 of clause 9 above.
- b. Amount spent on projects or programs or activities that benefit only the employees of the Company and their families.
- c. Contribution of any amount to a political party and feeder organisations.
- d. Contribution to temples, churches ,mosques and other places of worship for undertaking an activity other than of a secular nature

11.0 Audit of CSR Expenditure

The CSR expenditure will be audited on an yearly basis by an Independent Audit Firm in order to conform that the amounts spent are for the CSR projects/ programs or activities approved by the Board of Directors of the company and are in conformity with the Act, and the Rules thereof.



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12.0 CSR Monitoring and Reporting mechanism

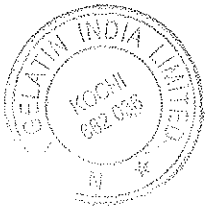
The Committee shall monitor the amount of expenditure spent on CSR activities on a quarterly basis and make report to the Board of Directors on half yearly basis. Apart from the above, the Directors' Report of the Company shall include an annual report on CSR containing the particulars in the prescribed format.

13.0 Display of the CSR Policy in the website of the Company

This policy approved by the Board of Directors of the Company shall be available for viewing at the company website www.gelatin.in

14.0 Validity and authority for modification/ amendments

This CSR Policy approved by the Board of the Company is effective from date of such approval and will be in force till such time it is modified or amended by the Board of Directors on recommendation of the Committee.



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