

NITTA GELATIN INDIA LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

1.0 Preamble

Nitta Gelatin India Limited, (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 growth and expansion of the Company, the surrounding areas also developed, in addition to giving direct and indirect employment to residents of that area. The management of the Company was always a helping hand for the neighborhood/ local areas, be it providing library and reading facilities, medical facilities and educational support for children etc. In short, the Company had been behaving as a responsible corporate citizen since its inception, understanding fairly well the requirements for the development of this village, which in turn contributes to the growth and prosperity of Company. This occurred during the period when Corporate Social Responsibility (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 Seiichi Nitta Foundation in the year 2010 to commemorate the memory of the forerunners, Mr. K T Chandy and Mr. Seiichi Nitta who handed down the mantle, Kerala Chemicals and Proteins Limited which is now Nitta Gelatin India Limited (NGIL).

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").

3.0 Applicability

This policy will apply to the organisation as a whole, including Gelatin, Ossein and Reva Division situated at Kakkanad, Koratty, Bharuch and the Registered Office of the Company at Panampilly Nagar, Ernakulam (Aroor Unit also included).

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 programmes.





5.0 CSR Committee

The 265th Meeting of the Board of Directors of the Company held on 29th January 2021 had disbanded the CSR Committee of the Board in view of the MCA notification in the month of September 2020, which mandates that where the amount to be spent by a Company on account of CSR for any Financial Year does not exceed Rs. 50.00 Lakhs (Rupees Fifty Lakhs), the Company need not conform to the requirement of having a CSR Committee of the Board- upon whose recommendation, the Board normally approves the CSR Budget besides reviewing the CSR expenditure against the budget.

Accordingly, a Committee of Executives was formulated, which would perform, in addition to recommending a CSR budget to the Board and overview of the CSR functions, additional functions such as holding discussions with beneficiaries and suitably apprising the Board on proposals that are worth pursuing upon merits.

The Managing Director of the Company is the Chairman of the Committee and all top Executives of the Company including Departmental Heads are the members of the Committee.

The profits of the Company being on the increase continuously, it is anticipated that the mandatory CSR spend based on the figures for the Financial Year 2022-2023 will be more than Rs.50 lakhs which will trigger the requirement to constitute a CSR Committee having atleast 3 Directors including one Independent Director. The terms of reference of CSR Committee shall be as follows:

- a. Recommend the amount of expenditure to be incurred on the CSR related activities of the Company.
- b. Monitor the CSR Policy of the Company from time to time.
- c. Formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the items as mentioned in rule 5(2) of the Companies (CSR Policy) Rules, 2014.

6.0 The CSR Policy

The CSR policy shall act as a guideline and a framework for approving schemes under the policy and their execution, monitoring and completion. In doing so, this policy is formulated 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 to be spent for CSR towards projects, programmes or activities undertaken in each financial year will be recommended by the Executive Committee/CSR Committee which will be approved by the Board of Directors with or without modification at the succeeding Board Meeting. Thereafter, the Executive Committee/CSR Committee to prescribe the modalities of execution of programmes and projects together with implementation schedules and monitoring process. The Executive Committee/CSR 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 – Seiichi Nitta Foundation or such other Trust, non– profit Company, Society, NGOs, Institutions and Agencies of the Government, Local bodies. , The Company shall be undertaking activities in the following areas as much as they are in consonance with the objects of K T Chandy – Seiichi 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 including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of 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.
 - c. Promoting camps against use of alcohol, smoking, drug abuse etc.
 - d. Awareness programme for organ donation.
 - e. Partnering with organizations which volunteer 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 vocational 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 Company's social responsibility.
- e. To provide cash awards, scholarships to students studying in School/Colleges and has secured high academic/professional records.
- f. 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 having 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.
- 9.3 Promoting gender equality, empowering women, setting up homes and hostels for women 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 projects related to the above.
 - 9.4 Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conversation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga
 - a. In association with various Local Authorities, as part of promotion of green environment, conduct awareness programs / distribute reusable and 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, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows





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 related to the above.
- 9.7 Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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.

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 hygiene 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.

10.1. Slum area development

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.]

10.2 Disaster management, including relief, rehabilitation and reconstruction activities





11.0 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.

12.0 CSR Monitoring and Reporting mechanism

The Executive Committee/CSR 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 the date of such approval and will be in force till such time it is modified or amended by the Board of Directors.

Placed at the 274th Meeting of the Board of Directors dated 08.02.2023

