



NITTA GELATIN INDIA LIMITED

SPEAK UP POLICY

Doc No : IA -001

Rev No : 0

Date : 11.05.2026

OBJECTIVE

Our Code of Business Conduct & Ethics Policy sets out our business principles and requires all persons working for & with Nitta Gelatin India Limited to uphold these values by acting in responsible, ethical and lawful manner.

The objective of this Speak Up Policy is to foster a culture of integrity, transparency, and accountability by encouraging employees and other stakeholders to raise concerns, in good faith (including who raises concerns through anonymous means) about suspected misconduct, unethical behavior, or violations of applicable laws, regulations, the Code of Conduct, or company policies. The policy aims to ensure that such concerns are reported through appropriate Speak Up channels and addressed promptly, fairly, and confidentially, without fear of retaliation.

SCOPE & APPLICABILITY

This policy applies to all individuals and entities associated with the organization irrespective of their tenure, designation or nature of engagement. This includes but is not limited to permanent, temporary, probationary, fixed term employees, directors, shareholders, officers, members of senior management, contractual staff, consultants, advisors and agency personnel, interns, trainees, apprentices, job applicants, former employees, vendors, customers, service providers, contractors and their employees or any other individual or entity having any business relationship with the company.

The policy applies across all offices, subsidiaries, affiliates, and operations of the organization, whether within India or internationally, subject to applicable local laws and regulations.

The policy covers the reporting of concerns in good faith relating to actual or suspected misconduct, unethical behavior or violations that impact the organization, its people or its stakeholders. This includes the concerns related to but not limited to the following:

1. Breaches of applicable law, regulations or regulatory guidelines,
2. Violations of Code of conduct or internal policies & procedures,
3. Fraud, bribery, corruption or financial irregularities, insider trading
4. Misrepresentation or improper financial or non-financial reporting,
5. Conflicts of interest or abuse of authority,
6. Discrimination, harassment, or inappropriate workplace behavior,
7. Human rights violations,
8. Health, safety, and environmental non-compliance,
9. Misuse, theft, or damage of company assets or resources,
10. Improper use or disclosure of confidential information,
11. Retaliation or threats against individuals who have raised concerns



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This Policy is intended to supplement, and not replace existing grievance redressal mechanisms, whistle-blower mechanism, operational escalation paths or complaint management procedures.

REPORTING MECHANISMS

The concerns may be reported through any of the following channels based on the nature of the issue and comfort level of the reporting individual:

- Reporting Manager/Function Head
- Human Resource Manager (HR Head)
- Chief Risk Officer
- External Speak Up Hotline Service Provider
- Audit Committee/Board of Directors

PROCEDURE FOR RAISING THE CONCERN

Any individual covered under this policy may raise a concern in good faith if there is reasonable belief that misconduct, unethical behavior, or a violation of applicable laws, the Code of Conduct, or company policies has occurred, is occurring, or is likely to occur.

Concerns should be raised as early as possible- within a period of 15 days through any of the designated Speak Up channels. Reports may be made verbally or in writing and should be factual and include specific information. The complainant may be contacted to furnish additional verifiable evidence on each allegation made, by the Third-Party Ethics Helpline Service Provider. If the complainant does not respond within 7 working days, the complaint may not get investigated due to lack of information/evidence.

The complaints may also be submitted **anonymously** to the designated Speak Up Channels. Though the reporter has the choice to remain anonymous, disclosure of identity is strongly encouraged, to enable the investigators to seek additional information, and investigate the issues raised thoroughly and properly. The identity of the reporter will be kept strictly confidential and used solely for the limited purpose of gathering evidence. If the complaint is made in good faith, there shall be no retaliation against the reporter.

The reporting individual is encouraged to provide relevant details such as the **nature of the concern which may include any information about irregularities, malpractices, misconduct, misbehavior, wrongdoing/Fraud, the individuals involved, and any supporting information available/evidence.**



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REVIEW OF CONCERNS & ACTIONS

Once a concern is reported through the designated Speak Up channels, it will be reviewed on a confidential basis to determine the appropriate course of action. If the complaint does not fall under the purview of Speak Up policy, then the same would be redirected to the right forum.

Concerns may be subjected to an independent and impartial investigation conducted by Chief Risk Officer or person designated by him/Audit Committee. All investigations will be carried out fairly, objectively, and in compliance with applicable laws and internal policies.

Based on the outcome of the review or investigation, appropriate corrective, preventive, or disciplinary actions may be taken, including policy or process improvements, disciplinary measures, or reporting to regulatory or law-enforcement authorities, where required.

The disciplinary action should be taken as per the Company's HR Policy.

PROTECTION, CONFIDENTIALITY & RESPONSIBLE REPORTING

The Company prohibits any form of retaliation against individuals who raise concerns in good faith under this policy. Any act of retaliation will be treated as a serious violation and may result in disciplinary action.

All reports and related information will be handled with appropriate confidentiality. Personal data will be processed responsibly and only for the purpose of reviewing and addressing the concern.

Reports must be made honestly and in good faith. Knowingly false, frivolous, or malicious reports, or misuse of the Speak Up mechanism, may result in disciplinary action.

No action should be taken against the reporter, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.

A reporter may choose to keep their identity anonymous and no effort must be made to establish the identity of the reporter. If the complaint makes vague / oblique references and is unable to provide any specific information / data, the Chief Risk Officer/Designated Speak Up Channel after doing basic due diligence can recommend appropriate disposal of the complaint.



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GOVERNANCE & OVERSIGHT

The Human Resource Manager is responsible for implementation of this policy and for ensuring that employees and other covered persons are made aware of Speak Up Mechanism. HR shall support the handling of concerns relating to workplace behavior, employee conduct, and other people-related matters, in coordination with relevant stakeholders.

The Chief Risk Officer is responsible for operationalizing the Policy including managing the receipt of concerns, preliminary review of concerns. The team shall investigate, track actions, maintain appropriate records in accordance with confidentiality and legal requirements including engagement of external experts in case required.

The Chief Risk Officer shall provide guidance on regulatory, legal, and policy-related aspects of reported concerns, ensure alignment with applicable laws and internal policies, and shall investigate compliance or ethical issues. The Chief Risk Officer shall also monitor adherence to the Policy and recommend improvements, where necessary.

The Management of the company shall have overall oversight of this Policy. The management shall periodically review the effectiveness of the Speak Up mechanism, oversee the handling of significant or sensitive concerns, and ensure that appropriate actions are taken. Matters involving senior management, serious misconduct, or financial irregularities may be escalated to the Audit Committee for review and direction.

MANNER IN WHICH CONCERNS CAN BE RAISED

1. Direct Disclosure to Reporting Manager at their respective designated Email Id or can speak directly to them or address the complaint in a sealed cover as detailed below:

a) The Reporting Manager (Function Head) (to be modified as appropriate)
Nitta Gelatin India Limited-Ossein Division
Kathikudam P O, Via Koratty,
Thrissur,680308

b) The Reporting Manager (Function Head) (to be modified as appropriate)
Nitta Gelatin India Limited-Gelatin Division
Kinfra Export Promotion Industrial Parks Limited,
PB No 3109, Infopark P O, Kakkanad, Kochi-682042



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c) The Reporting Manager (Function Head) (to be modified as appropriate)
Nitta Gelatin India Limited-Reva Division
Plot No 832, GIDC Industrial Estate, Jhagadia District, Bharuch
Gujarat-393110

2. Direct Disclosure to Head HR at his designated Email Id or can speak directly to them or address the complaint in a sealed cover as detailed below:

The Head of Human Resources (to be modified as appropriate)
Nitta Gelatin India Limited
Nitta Center, SBT Avenue
Panampilly Nagar
Ernakulam- 682036

3. Direct Disclosure to Chief Risk Officer at Email Id chiefriskofficer@nitta-gelatin.co.in or can speak directly to Chief Risk Officer or address the complaint to in a sealed cover as detailed below:

The Chief Risk Officer
Nitta Gelatin India Limited
Nitta Center, SBT Avenue
Panampilly Nagar
Ernakulam- 682036

4. In exceptional circumstances when the complaint is not addressed the way it is intended or where the complaint is against the Chief Risk Officer, the reporters can address the complaint to the Chairperson of the Audit Committee in a sealed cover at the following address:

The Chairperson
Audit Committee
Nitta Gelatin India Limited
Nitta Center, SBT Avenue
Panampilly Nagar
Ernakulam- 682036

5. Nitta Gelatin India Limited, has established a Third-Party Ethics Helpline site to report any ethical violation. Employees and other stakeholders can contribute to keeping Nitta Gelatin India Limited a safe and ethical place to work by using the independent ethics helpline to report concerns. This site accepts concerns submitted either anonymously or with disclosure of identity.



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Reporters may report their concerns -

a) By calling the Ethics Helpline Number:

India (Toll-free) at 18001026969

USA (Toll-free) at +1 (888) 4360393

Poland (Toll-free) at +(48) 800088123

United Kingdom (Toll-free) at +(44) 8083044704

Germany (Toll-free) at +(49) 80018017222

Sweden (Toll-free) at +(46) 20 127 164

Worldwide (Toll number) at +91 9595146146

b) Online at <https://nittagelatin.integritymatters.in>

c) By Email: nittagelatin@integritymatters.in

d) By mailing a letter to: Nitta Gelatin India Limited, C/o Integrity Matters, Unit 1211, CENTRUM IT Park, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West-400604, Maharashtra, India

Prepared By: Senior Officer – Internal Audit, NGIL

Reviewed & Approved By: Sr Vice President & CRO, NGIL