

BUSINESS RESPONSIBILITY REPORT

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1	Corporate Identity Number (CIN) of the Company:	L25209DN1985PLC000162
2	Name of the Company:	Nilkamal Limited
3	Registered address:	Survey No. 354/2 and 354/3, Near Rakholi Bridge, Silvassa-Khanvel Road, Vasona, Silvassa – 396 230, Union Territory of Dadra and Nagar Haveli.
4	Website:	www.nilkamal.com
5	E-mail id:	investor@nilkamal.com
6	Financial year reported:	April 1, 2019 to March 31, 2020
7	Sector(s) that the Company is engaged in (industrial activity code - wise): <i>As per National Industrial Classification – Ministry of Statistics and Programme Implementation</i>	i) 222 - Manufacture of plastic products ii) 471 - retail sales in non-specialized stores iii) 310 - manufacture of mattresses and pillows
8	List three key products/services that the Company manufactures /provides (as in balance sheet):	1] Plastic moulded products 2] Mattresses 3] Bubble Guard
9	Total number of locations where business activity is undertaken by the Company: a) Number of International Locations (Provide details of major 5): b) Number of National Locations:	None 10 plants, 18 @home stores, 8 @home franchise stores and 40 Nilkamal furniture Ideas stores and various regional and marketing offices alongwith warehouses across the country.
10	Markets served by the Company – Local/State/ National/International:-	Pan India alongwith exports to some of the international countries.

SECTION B: FINANCIAL DETAILS OF THE COMPANY

1	Paid up Capital (INR):	₹ 1,492.25 lacs
2	Total Turnover (INR):	₹ 208,147.38 lacs
3	Total profit after taxes (INR):	₹ 12,201.15 Lacs
4	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):	₹ 338 Lacs (2 %)
5	List of activities in which expenditure in 4 above has been incurred	Education, Rural Development, Health care, Hygiene and Sanitation, Animal welfare.

SECTION C: OTHER DETAILS

1.	Does the Company have any Subsidiary Company /Companies?	Yes the Company has 5 (five) subsidiaries.
2.	Do the Subsidiary Company/Companies participate in the BR initiatives of the parent Company? If yes, then indicate the number of such subsidiary company(s)	The Company encourages its subsidiaries to undertake BR initiatives to the fullest extent in their operations. The Company's three subsidiaries are incorporated outside India, they comply with the local statutory requirements of their respective countries.
3.	Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiative of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30-60%, More than 60%]	The Company encourages the stakeholders associated with it to adopt sustainable business practices.

SECTION D: BR INFORMATION

1. Details of Director/ Directors responsible for BR:

DIN: 00035747
 Name: Mr. Sharad V. Parekh
 Designation: Managing Director

b) Details of the BR head:

1. DIN Number (if applicable): 00035747
2. Name: Mr. Sharad V. Parekh
3. Designation: Managing Director
4. Telephone number: 022 4235 8651
5. E-mail ID: brr@nilkamal.com

2. Principle-wise (as per NVGs) BR Policy/policies

The National Voluntary Guidelines (NVGs) on Social, Environmental and Economic Responsibilities of Business released by the Ministry of Corporate Affairs has adopted Nine areas of Business Responsibility. These briefly are as under:

- P1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.
 P2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
 P3: Businesses should promote the wellbeing of all employees.
 P4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
 P5: Businesses should respect and promote human rights.
 P6: Businesses should respect, protect, and make efforts to restore the environment.
 P7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.
 P8: Businesses should support inclusive growth and equitable development.
 P9: Businesses should engage with and provide value to their customers and consumers in a responsible manner.

a) Details of compliance (Reply in Y/N)

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1.	Do you have a policy/ policies for:	Y	Y	Y	Y	Y	Y	Refer Note No. 1	Y	Refer Note No. 1
2.	Has the policy being formulated in consultation with the relevant stakeholders?	Yes								
3.	Does the policy confirm to any national / international standards? If yes, specify? (50 words)	Yes. The policies confirm with the standards laid in the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business issued by the Ministry of Corporate Affairs, Government of India, and also of the requirements of the Companies Act, 2013, BIFMA Level 3 and Green-guard certifications from UK cert, ISO 45001:2018, International Standards namely ISO 9001 - 2015, ISO 14001 -2015, ISO 50001-2011 etc.								
4	Has the policy being approved by the Board? Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	The Policies which are statutorily required to be adopted by the Board, have been approved by them, while the others policies are formulated and implemented by the Human resources department of the Company.								
5.	Does the Company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	The Company is having a Committee for CSR as well as Anti Sexual Harassment of Women at workplace and dedicated Ethic Counselors for Whistle Blower Policy. For other policies, the Company has put in place adequate process and resources for its implementation.								
6.	Indicate the link for the policy to be viewed online?	Please refer Note 3.								

7.	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes - on the website of the Company.
8.	Does the Company have in-house structure to implement the policy/ policies.	Yes
9.	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	Yes
10.	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	Yes

Note: The replies to the questions at serial no. 2 to 10 as mentioned above are applicable to all the Principles except the Principles 7 and 9.

- a) If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to 2 options)
- i) The Company has not understood the Principles
 - ii) The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles
 - iii) The Company does not have financial or manpower resources available for the task
 - iv) It is planned to be done within next 6 months
 - v) It is planned to be done within the next 1 year
 - vi) Any other reason (please specify)

Note 1: With respect to the Principle 7, the Company is a member of various chambers and associations through which it has been advocating from time to time in a responsible manner, and hence a specific policy for the same has not been adopted.

Note 2: With respect to the Principle 9, the Company has a systematic process of assessing customer needs, fulfilling them with innovative products and services and providing value to them in a responsible manner.

Note 3: The Company's CSR Policy, Code of Business Ethics, Code of Conduct, Whistle Blower Policy and Anti-Sexual Harassment Policy, Environment Policy and Health and Safety Policy are available on the Company's website at the following link: <https://nilkamal.com/corporate-governance/>

3. Governance related to BR:

a)	Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, annually, more than 1 year	The Business Responsibility performance of the Company shall be assessed annually.
b)	Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?	Yes, the Company uploads Business Responsibility Report annually, which is available at https://nilkamal.com/wp-content/uploads/2019/07/BUSINESS-RESPONSIBILITY-REPORT-2019-20.pdf

SECTION E: PRINCIPLE-WISE PERFORMANCE

	Principle 1	
1	Does the policy relating to ethics, bribery and corruption cover only the Company? Yes/ No. Does it extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others?	As one of the leading plastics processor in India and having diversified product portfolio, the Company's reputation is most important. How we conduct ourselves on a day to day basis with our customers, shareholders, competitors, contactors, neighboring communities, suppliers and distributor forms the basis of reputation of the Company as an ethical Company. We as a Company is committed to the philosophy of good corporate governance practices, thereby conducting business in a responsible manner. To achieve the said objective, the Company has certain policies namely the Code of Business Ethics for its employees, the Code of Conduct for Directors and

		<p>Senior Managerial Personnel, The Whistle Blower Policy, Insider Trading Prohibition Code containing (a) Code of Conduct to regulate, monitor and report Trading by designated persons in Securities of the Company. (b) Policy and procedure for inquiry in case of leak/suspected leak of Unpublished Price Sensitive Information. (c) Code of Practices and procedure for fair Disclosure of Unpublished Price Sensitive Information and the same are available on the Company's website at www.nilkamal.com. The Company also has in place an Anti-Sexual Harassment Policy which institutes specific mechanisms to deal with workplace harassment.</p> <p>The Company has also assigned dedicated e-mail ids for the stakeholders to raise their concerns under the above policies.</p> <p>Further, the Company also persuades its Indian Subsidiary, Joint venture, suppliers, contractors and others to follow the said policies, to the extent applicable to them.</p>
2	<p>How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so</p>	<p>The Company has in place a mechanisms for receiving and dealing with complaints from different stakeholders'. The Company responds to the complaints within a time bound manner.</p> <p>During the year, Company received 10 complaints from shareholders which were disposed-off within due time and there were no complaints which had remained unresolved at the end of the year. Further, the Company has not received any complaints under the Whistle Blower Policy of the Company.</p>
	Principle 2	
1	<p>List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.</p>	<p>Your Company is committed to offer quality standards for all range of products which are eco - friendly, safe and energy efficient products, thus incorporating social and environmental concerns. Some of the products introduced during the year 2019 - 20, are as below:</p> <ul style="list-style-type: none"> i) Designed and developed crates/totes with lid and other features which are to be used as returnable packaging in rapidly developing e-commerce and home delivery markets. This will reduce the use of corrugated boxes currently used for packaging which in turn reduce use of natural resource i.e. wood. ii) Designed and developed One-way Plastic Pallets for export and other reusable Pallets, replacing the conventional wooden pallets. Thus, reducing use of natural resource i.e. wood. iii) Designed and developed Plastic Hand wash basin with 4 taps for use in rural area schools. It is easy to install assembly, low cost and promote hygiene. iv) Plastic Fish Frames are developed for fishing industry replacing conventional wooden & metal frames. v) Designed and developed Prefabricated Plastic Manholes & Inspection Chambers. These are used underground for drainage and sewerage as well as in Electrical and Telecom applications. These are easy to install and assembly.
2	<p>For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):</p>	<p>The Company is continuously putting its efforts to improve Energy Management by way of monitoring energy related parameters on a regular basis. The Company's Environment Policy enables its employees to strive towards prevention of</p>

	<p>(a) Reduction during sourcing/ production/ distribution achieved since the previous year throughout the value chain?</p> <p>(b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?</p>	<p>pollution and for continuous conservation of valuable resources. As a measure of the same, the Company has installed :-</p> <p>i) 2 new Injection molding machines of medium and big tonnage capacity with new energy saving technology resulting in reduction of electrical units.</p> <p>ii) installed latest technology mould cooling system to optimize cooling time, subsequently reduction in cycle time.</p> <p>iii) Use of Solar Power Panels to source energy for manufacturing operations at our various plants viz; Barjora, Hosur, Sinnar, Kharadpada, Vassona plant.</p> <p>iv) Replaced hydro motors with electric servo motor to save energy.</p>
3	<p>Does the Company have procedures in place for sustainable sourcing (including transportation)?</p> <p>a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so</p>	<p>Yes.</p> <p>The Company encourages the HUB and Spoke Policy resulting in sustainable sourcing from many local based suppliers, giving them opportunity to supply raw materials and packing materials.</p> <p>The Company has strategically designed its distribution network in order to serve its distributors and the dealers thereof in the least possible transportation time.</p> <p>Further, all of our products can be used multiple times there by increasing its sustainability.</p>
4	<p>Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?</p> <p>a) If yes, what steps have been taken to improve their capacity and capability of local and small vendors?</p>	<p>Yes, the Company has registered many small scale units under MSME as its suppliers.</p> <p>The Company gives preference to local suppliers/producers especially by giving to local persons work on job work basis.</p> <p>Apart from providing resources, the Company's representatives also give on - the - job training with proper QMS practices, thus enabling the suppliers to get ISO-9001 certification, to ensure quality and productivity. The Company makes sure that they utilize their manufacturing capacity with preferred vendor program.</p>
5	<p>Does the Company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so</p>	<p>Yes, the Company has in-house grinders to grind and re-use its own process wastes. Also, it has installed extruder / pelletizing machine for making granules. The Company's complete recycling line, grinds and cleans used crates/pallets from its customers, and the said recycled material is then used to produce new crates and pallets for customers.</p> <p>Thus, waste management is highly focused and monitored through corporate management and recycling the product by using good waste management process.</p>
	Principle 3	
1	Please indicate the Total number of employees.	3,281
2	Please indicate the Number of permanent women employees.	255
3	Please indicate the Number of permanent employees with disabilities.	3

4	Do you have an employee association that is recognized by management?	No																
5	What percentage of your permanent employees is members of this recognized employee association?	Not Applicable																
6	Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.	The Company does not employ either on its own or through labour contractor any child labour or forced labour. Further, the Company has not received any complaints relating to involuntary labour or sexual harassment.																
	<table border="1"> <thead> <tr> <th>No.</th> <th>Category</th> <th>No. of complaints filed during the financial year</th> <th>No. of complaints pending as on end of the financial Year</th> </tr> </thead> <tbody> <tr> <td>i)</td> <td>Child labour/forced labour/involuntary labour</td> <td>Nil</td> <td>N.A</td> </tr> <tr> <td>ii)</td> <td>Sexual harassment</td> <td>Nil</td> <td>N.A</td> </tr> <tr> <td>iii)</td> <td>Discriminatory employment</td> <td>Nil</td> <td>N.A</td> </tr> </tbody> </table>	No.	Category	No. of complaints filed during the financial year	No. of complaints pending as on end of the financial Year	i)	Child labour/forced labour/involuntary labour	Nil	N.A	ii)	Sexual harassment	Nil	N.A	iii)	Discriminatory employment	Nil	N.A	
No.	Category	No. of complaints filed during the financial year	No. of complaints pending as on end of the financial Year															
i)	Child labour/forced labour/involuntary labour	Nil	N.A															
ii)	Sexual harassment	Nil	N.A															
iii)	Discriminatory employment	Nil	N.A															
7	<p>What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?</p> <p>a) Permanent Employees b) Permanent Women Employees c) Casual/Temporary/Contractual Employees d) Employees with Disabilities</p>	<p>The employees are the key asset to the Company's growth. And hence their safety is of utmost priority to the Company. The Company has in place a Health and Safety Policy, which prioritizes the health and safety of all persons working within the Company premises. The Company is committed to providing the employees a safe and healthy work Environment. The Company provides health, safety & skill training on periodical basis. Further, the Company also imparts training on a regular basis to its retail workforce for enhancement of their skills.</p>																
	Principle 4																	
1	Has the Company mapped its internal and external stakeholders? Yes/No	Yes																
2	Out of the above, has the Company identified the disadvantaged, vulnerable & marginalized stakeholders	Yes																
3	Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so	<p>Yes</p> <p>The Company is responsive towards all stakeholders. The Company tries to engage local workforce to the extent feasible for any new project or expansion at any of its existing location. The Company also undertakes a project on a continuous basis named as 'V30Winner', which provides opportunity to and proactively engages the disadvantaged, vulnerable and marginalized section of its workforce.</p> <p>Under this project a group of 3 - 5 workman is formed who provides the Company innovative ideas, either financial or non-financial, for the benefit of the Company. The best ideas amongst all are selected and adopted by the Company and the team is incentivized.</p> <p>In this manner the Company recognizes and motivates the marginalized stakeholders.</p> <p>The Company extends its social responsibility by engaging in providing education to underprivileged, medical and sanitation facilities through its CSR projects.</p>																

	Principle 5	
1	Does the policy of the Company on human rights cover only the company or extend to the Group / Joint Ventures / Suppliers / Contractors/NGOs/Others?	The Company believes that a sustainable organization rests on a foundation of respect for human rights. Hence it is committed to protect the human rights across the Company. The Company has in place a Human Rights policy which prioritizes the various rights of the employees' working within the Company and further all other aspects of the Human rights are covered by the Company's internal HR policies and practices. The Company does not hire child labour, forced labour or involuntary labour and never discriminates between its employees. Further, the Company also persuades its Joint venture, suppliers, contractors and others to follow the said practices, to the extent possible.
2	How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?	Nil
	Principle 6	
1	Does the policy related to Principle 6 cover only the company or extends to the Group/ Joint Ventures /Suppliers /Contractors/NGOs/others?	The Company's policy on Environment is applicable to all, including its subsidiary & Joint Venture Companies. Further, the Company obtains its raw material from large suppliers who themselves are law compliant and have National awards to their credit.
2	Does the Company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc.? Y/N. If yes, please give hyperlink for webpage etc.	<p>Yes. The Company's policy on Environment guides the organization to continually mitigate the impact on climate change and global warming as a result of its operations. The Company is continuously working to improve energy efficiency in its operations. The Company adheres to all legal requirements and norms of energy conservation standards stipulated by the Government of India. Energy conservation initiatives are part of regular operations.</p> <p>Your Company has been certified for "Green Guard" compliance which ensures:</p> <ul style="list-style-type: none"> i) Consumption of less energy at the manufacturing stage. ii) Harmful gases are not emitted when exposed for longer duration which pollutes indoor air quality. iii) Safe disposal or recycling to make new products at the end of its life cycle. iv) Initiated project for Zero Ozone depleting potential (ODP) and Reduce Global warming potential (GWP) by replacing the PU system. <p>Further, the plastic raw materials, used by the Company are FDA and RoHS compliant, and the practice of reduce, recycle & reuse of scarce resources and waste management, including hazardous wastes, too is done in accordance of the PCB norms.</p>
3	Does the Company identify and assess potential environmental risks? Y/N	<p>Yes. Aspect & Impact Study for all processes is carried out with proper Management program for all significant aspects.</p> <p>ISO 9001- 2015, 14001 – 2015, ISO 50001 -2011 and ISO 4500 - 2018 are adopted at Units as the quality and environment management system standards.</p> <p>Yes, the Company has a mechanism to identify and access potential environmental risks in its plants.</p>
4	Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or	Yes. The Company has consistently managed and improved the environmental performance. The Company is sensitive to its role as user of natural resources. The efforts to manage

	so. Also, if Yes, whether any environmental compliance report is filed.	water, energy and material resources at all its units have yield positive results. Further, Waste Management disposal is also practiced across all units.
5	Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N If yes, please give hyperlink for web page etc.	Yes. The Company has undertaken initiatives in recycling system of our own polymeric products alongwith the same the energy consumption reduction under umbrella of ISO 50001 system to reduce overall carbon foot print and utilization of solar system capacity is also increased in other plants.
6	Are the Emissions/ Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?	Yes
7	Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.	Nil
	Principle 7	
1	Is your Company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:	Federation of Indian Chambers of Commerce and Industry (FICCI) and Plastic Export Promotion Council (PLEX Council), Retail Association of India (RAI).
2	Have you advocated/ lobbied through above associations for the advancement or improvement of public good? Yes/No; If yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)	Yes. The Company generally supports the decisions taken by the associations to which the Company is connected with.
	Principle 8	
1	Does the Company have specified programmes / initiatives / projects in pursuit of the policy related to Principle 8? If yes details thereof.	Yes. The Company have a CSR policy in place and it carried out activities majorly in the areas of education, providing of health care hygiene and sanitation facilities, animal welfare and rural development.
2	Are the programmes/projects undertaken through in-house team/own foundation/ external NGO/ government structures/any other organization?	The Company extends its social responsibility through Nilkamal Foundation, a section 8 Company – the Implementing Agency.
3	Have you done any impact assessment of your initiative?	The Company makes CSR spends through Nilkamal Foundation – implementing agency, which contributes to various institutions/ projects having good track record. Since, impact assessment is an ongoing process, the Company periodically assess whether the said institutions have utilized the funds towards the purpose for which they have been donated. The Company has also recently completed an in-house project through its implementing agency for reconstruction and modernisation of Government School near Mahuva, Gujarat.
4	What is your Company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken.	During the year ended March 31, 2020, the Company has spent ₹ 383.83 lacs on various projects through its implementing agency viz; Nilkamal Foundation . The details of the same are provided under the 'Annual Report on CSR' section.
5	Have you taken steps to ensure that this community development initiative is	The Company has contributed its funds to institutions furthering the benefit to the disadvantaged and needy section

	successfully adopted by the community? Please explain in 50 words, or so	of the society and the same has been acknowledged by them. The Company is also monitoring that the school reconstructed by them is functioning in a proper manner and the benefits of the same are passed in a systematic manner to the under privileged children's.
	Principle 9	
1	What percentage of customer complaints/ consumer cases are pending as on the end of financial year?	4.19% of the customer complaints received during the year were pending.
2	Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes / No / N.A. Remarks (additional information)	Yes. The products of the Company display all information which is mandated by law including the directions for use. The Company follows all legal statutes with respect to product labeling and displaying of product information, such as features, attributes, benefits, recycling codes, etc., wherever applicable. Further, the Company adheres to appropriate advertising policies and also adopts fair business practices in all its dealings. The Company never restricts the freedom of choice and free competition in any manner while catering to its customer needs.
3	Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behavior during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.	Nil
4	Did your Company carry out any consumer survey/ consumer satisfaction trends?	Yes, the Company has carried out certain customer satisfaction surveys for its retail brand i.e. @ home through Google talk. Further the Company also conducted surveys with its channel partners in order to check the service level of the Company.