

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, 2021 to March 31, 2022
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] Racking & Shelving
9	Total number of locations where business activity is undertaken by the Company:	
	a) Number of International Locations (Provide details of major 5):	None
	b) Number of National Locations:	9 plants, 18 @home stores, 17 @ home franchise stores and 12 Nilkamal home 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):	2,47,547.62 Lacs
3	Total profit after taxes (INR):	7,929.22 Lacs
4	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):	302.39 Lac (2%)
5	List of activities in which expenditure in 4 above has been incurred	Education, Health care, Hygiene and Sanitation.

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 initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]	<p>The Company encourages the stakeholders associated with it to adopt sustainable business practices.</p> <p>Further more than 85% of the Company's suppliers are well renowned companies who have their own BR initiatives and sustainability practices; hence they strictly follow their practices.</p>

SECTION D: BR INFORMATION

1. Details of Director/ Directors responsible for BR:

- a) DIN: 00037550
Name: Mr. Hiten V. Parekh
Designation: Managing Director
- b) Details of the BR head:
 1. DIN Number (if applicable): 00037550
 2. Name: Mr. Hiten 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.

Details of compliance (Reply in Y/N)

No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
1	Do you have a policy/ policies for:	Y	Y	Y	Y	Y	Y	Refer note 2.	Y	Refer note 3.
2	Has the policy being formulated in consultation with the relevant stakeholders?	Yes								
3	Does the policy conform 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- 2018 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 4.
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

Note1: 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.

Note 2: 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 3: 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 4: 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 is assessed periodically/regularly.
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 www.nilkamal.com

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1	
<p>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?</p>	<p>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 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 email ids for the stakeholders to raise their concerns under the above policies.</p> <p>The Company also persuades its Indian Subsidiary, Joint venture, suppliers, contractors and others to follow the said policies, to the extent applicable to them. Further more than 85% of the Company's suppliers are well renowned companies who have their own BR initiatives and sustainability practices; hence they strictly follow their practices.</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 4 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>
<p>Principle 2</p>		
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>The Company believes in developing products which are efficient and environment friendly and several steps have been taken in this direction. It 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 2021-22, are as below:</p> <ul style="list-style-type: none"> i) Designed & Developed injection moulded plastic Core Trays, in partnership with an Australian company, for handling various metal cores, which are extracted during metal drilling & exploration. These plastic core trays are meant to replace the existing GI boxes and Wooden trays, which have an environmental impact and also not efficient in handling the metal cores. ii) Designed & Developed injection moulded Plastic pallets for ASRS (Automated Storage & Retrieval Systems) designed Warehouses. Also designed & developed injection moulded plastic Crates for ASRS warehouses of E-commerce companies etc. iii) Designed & Developed various injection moulded / roto moulded products like material handling crates, waste bins, Max bins etc. for automotive industry (gears), Chemical industry (Bromine bottles), Municipality garbage collection, which were using metal or wood systems.

		<p>iv) Designed vaccine Box 46 FF (Freeze free) used for safe storage and transport of Vaccines without icepacks.</p>
<p>2</p>	<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>(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>The Company's Policies on Environment & Energy has ensured an organization wide sustained culture to strive towards pollution prevention and for continuous improvement to Reduce, Recycle and Re-use. It enables its employees to strive towards prevention of pollution and for continuous conservation of valuable resources. The mould cooling technology which is being used in our plants, has led to improvement in cycle time and product quality.</p> <p>Energy Consumption in 2021-22 has reduced to 0.66 units per kilo of production which is less than the consumption in 2020-21. The Company is using Energy from Renewable sources i.e. Solar at 6 of its Plants and Wind energy at one Plant.</p> <p>The Company's sustained commitment towards Zero water discharge has ensured that waste water, generated in all the factories, are recycled and reused for Gardening and toilet flushing.</p>
<p>3</p>	<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. 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>In packing material, recycling codes, thickness in microns, suppliers name & address, recycling code and buyback prices are printed in line with the statutory requirements.</p> <p>All of our products can be used multiple times there by increasing its sustainability. The Company is constantly developing the local vendors which are nearer to its factories.</p> <p>Further more than 85% of the Company's suppliers are well renowned companies who have their own BR initiatives and sustainability practices; hence they strictly follow their practices.</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 has taken steps to procure goods and services from local & small producers by procuring Packing materials and other goods & services.</p> <p>Apart from providing resources, the Company's representatives also give on-the-job training with proper QMS practices being adopted by them to ensure quality and productivity and reduction of waste. 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>The Company has managed to recycle 94% of all its Plastic waste and waste oil is recycled and reused by around 90%.</p> <p>The Company is also working on the Circularity programs & ESG programs along with our customers.</p> <p>Thus, wastage 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	3,225
2	Please indicate the Number of permanent women employees	235
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	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.

harassment in the last financial year and pending, as on the end of the financial year

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 What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?

a) Permanent Employees
b) Permanent Women Employees
c) Casual/Temporary/Contractual Employees
d) Employees with Disabilities

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, factory workforce & workforce at its various warehouses for enhancement of their skills.

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

Yes

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.

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>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. They all are practicing Sustainable practices such as use of renewable energy, rain water harvesting, water recycling etc.
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>The Company has transited from ISO50001:2011 to the latest ISO50001:2018 version, certified by TUV-SUD Germany for upgrading its Energy Management Systems by identifying its significant Risks & Opportunities based on international norms and standards of governance.</p> <p>The Company has transited from ANSI / BIFMA E3-2014 to ANSI / BIFMA E3-2019 (Level 3 compliance) certified by UK CERT ensuring that products are meeting BIFMA test</p>

		<p>standards & processes are human safe & environment friendly.</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. <p>The Company has taken the following initiatives to address global environmental issues such as Climate change, global warming, Fresh water supply -</p> <ol style="list-style-type: none"> 1. Practicing Zero Water discharge for the past 4 years. (Water recycling). 2. Adopted Rain water harvesting. 3. Promoting Environment friendly products such as Wello Water Wheel for porting water to help women from the tedious task of carrying water in vessels over their head. 4. Using FDA & RoHS compliant Plastic Raw Materials. 5. Practice of reduce, recycle & reuse of scarce resources and waste management, including hazardous wastes, are as per PCB norms. 6. Implemented project for Zero Ozone depleting potential and Reduce Global warming potential by replacing the PU system at all its plants.
3	<p>Does the Company identify and assess potential environmental risks? Y/N</p>	<p>Yes. Aspect & Impact Study for all processes is carried out with proper Management program for all significant aspects.</p> <p>The Company has implemented ISO EHS system at our plants. It continues to effectively maintain ISO14001:2015 EMS and were re-certified in 2021-22 by TUV-Germany</p> <p>The Company has a mechanism to identify and access potential environmental risks in its plants.</p>
4	<p>Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed</p>	<p>Yes. The Company ensures consistent reduction of energy consumption across all units. 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 water, energy and material resources at all its units have yielded positive results. Further, Waste Management disposal is also practiced across all units.</p> <p>The Company is using LPG / PNG for its Roto Molding processes, having converted from Diesel, for the past 4 years. The Company is practicing Constant monitoring and control of</p>

		water to maintain Zero Water discharge for the past 5 years. The Company files Environment Statement Form V.
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 use of renewable energy by installing and commissioning 4100KWP Solar Energy in six of its plants in the past 4 years. The Company has successfully utilized Solar Energy Consumption of 43.9 Lakh Units of electricity in 2021-22. The Company has successfully utilized Wind Energy Consumption of 63.5 Lakh Units of electricity in 2021-22 at its Hosur Plant.
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?	Yes. The Company have a CSR policy in place and it carried out activities majorly in the areas of education and providing of health care facilities.

	If yes details thereof	
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 projects directly as well as through the Implementing Agency.
3	Have you done any impact assessment of your initiative?	The Company makes CSR spends through various implementing agencies, which undertakes various projects. 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 contributed.
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, 2022, the Company has spent c 302.39 lacs on various projects through implementing agency. 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 successfully adopted by the community? Please explain in 50 words, or so	The Company has contributed its funds to institutions furthering the benefit to the disadvantaged and needy section of the society and the same has been acknowledged by them.
	Principle 9	
1	What percentage of customer complaints/ consumer cases are pending as on the end of financial year	3% 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 had conducted Customer Satisfaction Surveys inorder to judge the quality and service levels by the Company.
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