



Business Responsibility Report

Preface

The Securities and Exchange Board of India (“SEBI”) has mandated India’s top 1,000 listed entities based on market capitalisation on the BSE and NSE to submit a ‘Business Responsibility Report’ (“BRR”) along with their Annual Report.

This report is required to be in line with the ‘National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business’ (NVGs) as released by the Ministry of Corporate Affairs (MCA) in July 2011.

Nirlon Limited (“NL” / “the Company”) presents its first BRR, in line with the NVGs and the BRR requirement of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

This BRR provides information about the key initiatives undertaken by the Company, driven by the triple bottom line aspects viz. social, environmental and economic. The business responsibility performance of the Company will be assessed periodically by its Board of Directors.

The Company

Nirlon Limited is publicly listed company, and is in the business of development of an Information Technology Park i.e. Nirlon Knowledge Park (“NKP”) registered with the Department of Industries (“DOI”). NKP is also an Information Technology (IT) Park as per the Government of Maharashtra’s (“GOM”) IT Policy. It is a subsidiary of Reco Berry Pvt. Ltd., Singapore. The Company has no subsidiaries.

This is the first BRR of Nirlon Limited for the F.Y. 2019-2020. Initiatives and actions by the Company towards objectives have also been provided in this Report. The Company’s approach to each principle is described below:

Section A: General Information

1	Corporate Identity Number (CIN) of the Company	L17120MH1958PLC011045
2	Name of the Company	Nirlon Limited
3	Registered address	Pahadi Village, off the Western Express Highway, Goregaon (East), Mumbai 400 063.
4	Website	www.nirlonltd.com
5	E-mail id	info@nirlonltd.com
6	Financial Year reported	2019-2020
7	Sector(s) that the Company is engaged in (industrial activity code-wise)	Industrial Park NIC 42901
8	List three key products/services that the Company manufactures/provides (as in balance sheet)	The Company is in the business of development and management of the Industrial Park / Information Technology (IT) Park, i.e. Nirlon Knowledge Park (NKP) - Goregaon (East), Mumbai 400 063
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	NIL Mumbai , India
10	Markets served by the Company – Local/State/ National/International	Mumbai , India

**Section B: Financial Details**

1	Paid up Capital (As on 31.03.2020): (₹)	90,11,80,400/-
2	Gross Revenue from operations (₹)	3,10,99,00,000/-
3	Total profit after taxes (₹)	1,09,48,00,000/-
4	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	2.20%
5	List of activities in which expenditure in 4 above has been incurred:	
	i. Venus Cultural Association (Medical – Dialysis unit)	15,00,000/-
	ii. Maharashtra Chief Minister Relief Fund (General Relief)	1,00,00,000/-
	iii. Chennai Liver Foundation (Medical – Liver ailments)	10,00,000/-
	iv. Cheshire Homes India (Special education to disabled children)	5,00,000/-
	v. Jai Vakeel Foundation and Research Centre (Special education)	11,00,000/-
	vi. Muktang Education Trust (Promoting education)	5,00,000/-
	vii. Society for the Rehabilitation of Crippled Children (Helping children with learning disorders by providing therapy)	5,00,000/-
	viii. Saraswati Vidyak Trust (Education to underprivileged children)	5,00,000/-
	ix. Rotary & Blood Bank Society Resource Centre (100% voluntary blood donation by means of either indoor or outdoor blood donation camps)	6,00,000/-
	x. Konark Cancer Foundation (Logistical, emotional and financial support to underprivileged cancer patients)	10,00,000/-
	xi. EmancipAction, India Foundation (Providing counselors to government and private care homes to test a holistic, trauma informed model of care to help children transform their lives. Core modules include, wellness vocational planning and job placement)	10,00,000/-
	xii. Sion Hospital (Supply of ventilator – COVID 19 related)	11,72,000/-



Section C: Other details

1	Does the Company have any Subsidiary Company/ Companies?	No
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)	NA
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%]	NA

Section D: BR information

1. Details of Director/Directors responsible for BR

(a) Details of the Director/Director responsible for implementation of the BR policy/policies

1. DIN Number : 00388980
2. Name : Rahul V. Sagar
3. Designation : Executive Director & CEO

(b) Details of the BR head

No.	Particulars	Details
1	DIN Number (if applicable)	NA
2	Name	Jasmin K Bhavsar
3	Designation	Company Secretary & Vice President (Legal)
4	Telephone number	022-26853039
5	e-mail id	jasminbhavsar@nirlonltd.com

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

(a) Details of compliance (Reply in Y/N): Please note that the Company is engaged in the business of providing office premises on a leave and license basis. The Company has only three employees. The policies formulated by the Company are in the context of the business of the Company and its workforce.

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	N	Y	Y	N	N	N	N	Y
2	Has the policy being formulated in consultation with the relevant stakeholders?	Y	NA	Y	Y	NA	NA	NA	NA	Y
3	Does the policy conform to any national / international standards? If yes, specify? (50 words)	NA	NA	NA	NA	NA	NA	NA	NA	NA
4	Has the policy being approved by the Board? Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	Y	NA	Y	Y	NA	NA	NA	NA	Y
5	Does the company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	Y	NA	Y	Y	NA	NA	NA	NA	Y
6	Indicate the link for the policy to be viewed online?	i. http://www.nirlonltd.com/pdf/ccbe_nov_18_v1.pdf ii. http://www.nirlonltd.com/pdf/whistle_blower_policy_nov_18_v2.pdf								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	NA	Y	Y	NA	NA	NA	NA	Y



8	Does the Company have in-house structure to implement the policy/ policies?	Y	NA	Y	Y	NA	NA	NA	NA	Y
9	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	Y	NA	Y	Y	NA	NA	NA	NA	Y
10	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	N	NA	N	N	NA	NA	NA	NA	N

If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
1	The company has not understood the Principles									
2	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles		√			√	√	√	√	
3	The company does not have financial or manpower resources available for the task									
4	It is planned to be done within next 6 months									
5	It is planned to be done within the next 1 year									
6	Any other reason (please specify)	Please note that the Company is engaged in the business of providing office premises on a leave and license basis. The Company has only three employees. The requirement for the Company to have these policies is driven by the nature of its business and its workforce .								

2. 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

Ans.: The BR performance of the Company will be assessed once in a year.

- (b) Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

Ans.: Yes, the BR forms part of the annual report of the Company. The report is also available on the website of the Company at: www.nirlonltd.com.

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1

- 1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No.

Ans.: Yes

- 2. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs /Others?

Ans.: No

- 3. 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.

Ans.: No stakeholder complaints have been received in the past financial year.

**Principle 2**

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

Ans.: The Company is owner of Nirlon Knowledge Park (NKP), an approx. 23 acre campus in Goregaon (East), Mumbai. NKP is an Industrial Park as per the Government of India as per the consolidated Foreign Direct Investment Policy, and is an IT park under the Government of Maharashtra's IT Policy.

NKP's Design Philosophy and Master Plan have incorporated sustainability and a 'Green' ethos since inception. The Campus is a Leeds Gold certified Core and Shell development, with the ongoing Phase 5 targeted to be Platinum certified. The Park's emphasis is on user and pedestrian comfort and safety. The design incorporates extensive green recreational spaces with water bodies, and approx. 1000 trees, many of which are old growth.

The Company offers office premises to reputed international and Indian corporates, and has been making specific efforts to license its development to well regarded companies. The campus is fully operational and functional.

NKP facilitates its occupants to carry on their business from the NKP Campus 24*7 *365. This in turn generates employment, and the development of areas peripheral to the Campus.

2. Does the company have procedures in place for sustainable sourcing (including transportation)?

- (a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.

Ans.: The nature of business of the Company is to provide office premises on a lease and license basis. The business of the Company does not involve any manufacturing operations. However, during the construction period, sustainable sourcing and the use of eco-friendly products was actively pursued, and was in accordance with Leeds Gold requirements. The Company has also designed and constructed Leeds Gold certified buildings through the use of appropriate materials and equipment which allow consistent, ongoing savings of power & water, and offer natural light. It also uses re-cycled water for flushing of toilets, and has an organic waste management convertor on site to sustainably process all organic waste generated in the Campus.

3. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?

- a) If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

Ans.: The Company has appointed various local sub-contractors, who are have adequate resources and are capable of delivering services such as manpower and other miscellaneous requirements.

4. 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.

Ans: Yes. Within the context that the Company is a provider of office space on a lease and license basis in its Industrial/ IT Park, water and solid waste is recycled as described earlier in Principle 2.

Principle 3

1. Please indicate the Total number of employees.

Ans.: The Company has three employees, who are Key Managerial Personnel as per the Companies Act, 2013.

2. Please indicate the Total number of employees hired on temporary/contractual/casual basis.

Ans.: The Company engages temporary /contractual / casual employees primarily in the areas of housekeeping, security, engineering, construction etc. as per its requirement.

3. Please indicate the Number of permanent women employees.

Ans.: Nil

4. Please indicate the Number of permanent employees with disabilities

Ans.: Nil

5. Do you have an employee association that is recognized by management?

Ans.: No

6. What percentage of your permanent employees is members of this recognized employee association?

Ans.:NA.

7. 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.

Ans.: Nil



No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
1	Child labour/forced labour/involuntary labour	Nil	NA
2	Sexual harassment	Nil	NA
3	Discriminatory employment	Nil	NA

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

Ans.:

(a) Permanent Employees: The Company provides these employees with an opportunity to excel and to attend various professional development programmes as required.

(b) Permanent Women Employees: NA since the Company does not have any women employees.

(c) Casual/Temporary/Contractual Employees: Nil

(d) Employees with Disabilities: NA

Principle 4

1. Has the company mapped its internal and external stakeholders? Yes/No

Ans.: Yes, the Company is sensitive to the requests of shareholders and stakeholders, and consistently attends to their various suggestions and requests, including those received at various general meetings of the Company. It also provide stakeholders with requisite disclosures that are required to be given in its annual reports, providing press releases, announcements etc. to the media as and when required in relation to the Company. The Company regularly meets its payment obligations such as applicable property taxes, N.A. tax, repayment of loans to its lenders, and procures relevant insurance policies as applicable for its business activities.

The Company also follows a transparent investor communication protocol which includes regular investor presentations, by uploading of relevant information on its website and also filing the same with BSE Ltd. by prompt dissemination of price sensitive information etc. After the end of each quarter, the Company voluntarily provides and investor presentation with all required details as well as key financial information pertaining to that quarter to the stock exchange. This is done to ensure symmetry of information in line with the principles of fair disclosures.

2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.

Ans.: NA

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.

Ans.: NA

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?

Ans.: Since the Company has three employees no specific policy is formed. The Company provides these employees with an opportunity to excel and to attend various professional development programmes as required.

2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

Ans.: 23 (Twenty three) shareholders' complaints were received in the F.Y. 2019-20 with respect to their shares transfer / unclaimed dividend payment etc. The same was attended promptly to the satisfaction of shareholders and 0 (Zero) number of the complaints was pending during the F.Y. 2019-20.



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.

Ans.: The Company is a non polluting industry and therefore it is not required to have a specific policy in this regard.

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.

Ans.: Yes. The Company is a non-polluting Industry. Initiatives described above for Principle 2.

Does the company identify and assess potential environmental risks? Y/N

Ans.: NA . Since the Company is engaged in a non-polluting industry.

3. 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?

Ans.: No

4. 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.

Ans.: Yes. In addition to the Initiatives described above for Principle 2, the Company has a installed rainwater harvesting system in NKP.

5. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?

Ans.: NA

6. 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.

Ans.: 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:

Ans.: NIL

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)

Ans.: NA

Principle 8

1. Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.

Ans.: Yes, the company does make contribution towards corporate social responsibility (CSR) activities as required under applicable law. The Company focuses mainly on healthcare and education to meet its CSR objectives.

2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/ any other organization?

Ans.: The programs/ projects are undertaken through outside agencies.

3. Have you done any impact assessment of your initiative?

Ans.: The Company does a periodic assessment of its initiatives.

4. What is your company's direct contribution to community development projects- Amount in ₹ and the details of the projects undertaken.

Ans.: NA



NIRLON

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.

Ans.: NA

Principle 9

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.

Ans.: Nil

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)

Ans.: NA

3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.

Ans.: No

4. Did your company carry out any consumer survey/ consumer satisfaction trends?

Ans.: The Company periodically carries out surveys with its Licensees to understand their level of satisfaction with the overall occupant/customer experience in NKP. Licensee feedback is taken seriously and the Company engages with Licensees post such surveys to follow through on the feedback provided.