



**Business  
Responsibility  
& Sustainability  
Report**

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## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	→ L31909DL1981PLC349793
2	Name of the Listed Entity	→ Lumax Auto Technologies Limited (LATL)
3	Year of incorporation	→ 1981
4	Registered office address	→ 2nd Floor, Harbans Bhawan-II Commercial Complex, Nangal Raya, New Delhi - 110 046
5	Corporate address	→ Plot No. 878, Udyog Vihar, Phase V, Gurugram - 122 016, Haryana, India
6	E-mail	→ <a href="mailto:contactbrsr.latl@lumaxmail.com">contactbrsr.latl@lumaxmail.com</a>
7	Telephone	→ 0124-4760000
8	Website	→ <a href="https://www.lumaxworld.in/lumaxautotech">https://www.lumaxworld.in/lumaxautotech</a>
9	Financial year for which reporting is being done	→ April 01, 2023 - March 31, 2024
10	Name of the Stock Exchange(s) where shares are listed	→ BSE Limited and National Stock Exchange of India Limited
11	Paid-up Capital	→ ₹ 13,63,15,410
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	→ Mr Pankaj Mahendru Telephone: 0124-4760000 E-mail : <a href="mailto:contactbrsr.latl@lumaxmail.com">contactbrsr.latl@lumaxmail.com</a>
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	→ Unless otherwise stated, the disclosure under this report have been made on a consolidated basis i.e. LATL and its Subsidiaries (The Entity).
14	Name of assurance provider	→ Not applicable as per the SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated July 12, 2023.
15	Type of assurance obtained	→ Not applicable as per the SEBI Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated July 12, 2023.

**II. Products/services**

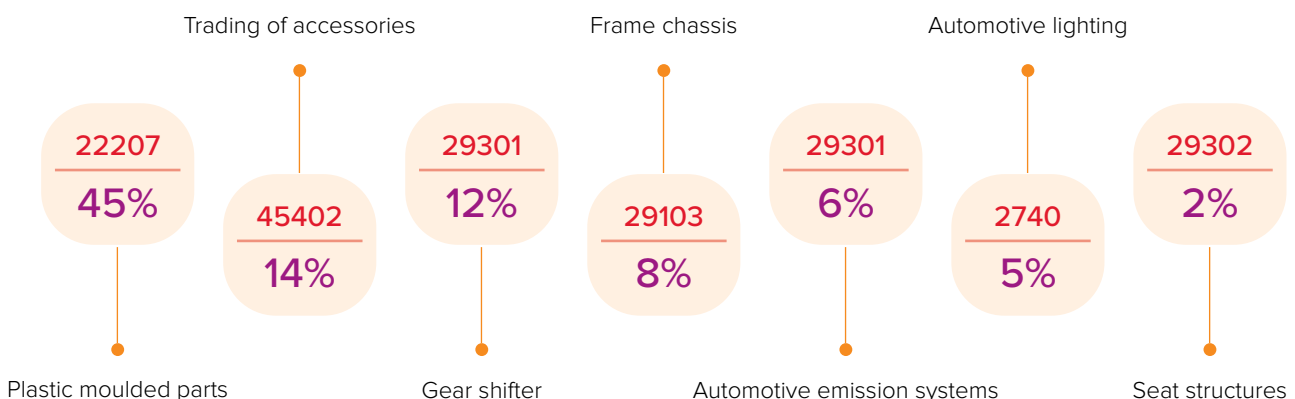
**16 Details of business activities (accounting for 90% of the turnover):**

Description of main activity	Description of business activity	% of turnover of the entity
1 Manufacturing	<ul style="list-style-type: none"> <li>Advanced Plastics, which includes IAC product portfolio along with lighting, emission and moulding products.</li> <li>Structure and Control systems domain, which includes the metallic and transmission products.</li> <li>The Mechatronics, that includes the electronics, sensors and the telematics components.</li> </ul>	82%
2 Trading of automobile parts/components	Sale of various automotive parts and components of PV, CV and two/three-wheelers.	14%
3 Mould and tool sale	Sale of various automotive mould and tools for PV, CV and two/three-wheelers parts.	2%
4 Sale of services & others	In addition to service of sold product, the Entity offer mould services and job work for parts used in passenger vehicles (PV), commercial vehicles (CV), and two/three-wheelers.	2%

\*These details are in line with Form No. MGT-7 prescribed by MCA

**17 Products/Services sold by the entity (accounting for 90% of the entity's Turnover):**

● Product/service    ● NIC Code    ● % of total Turnover contributed



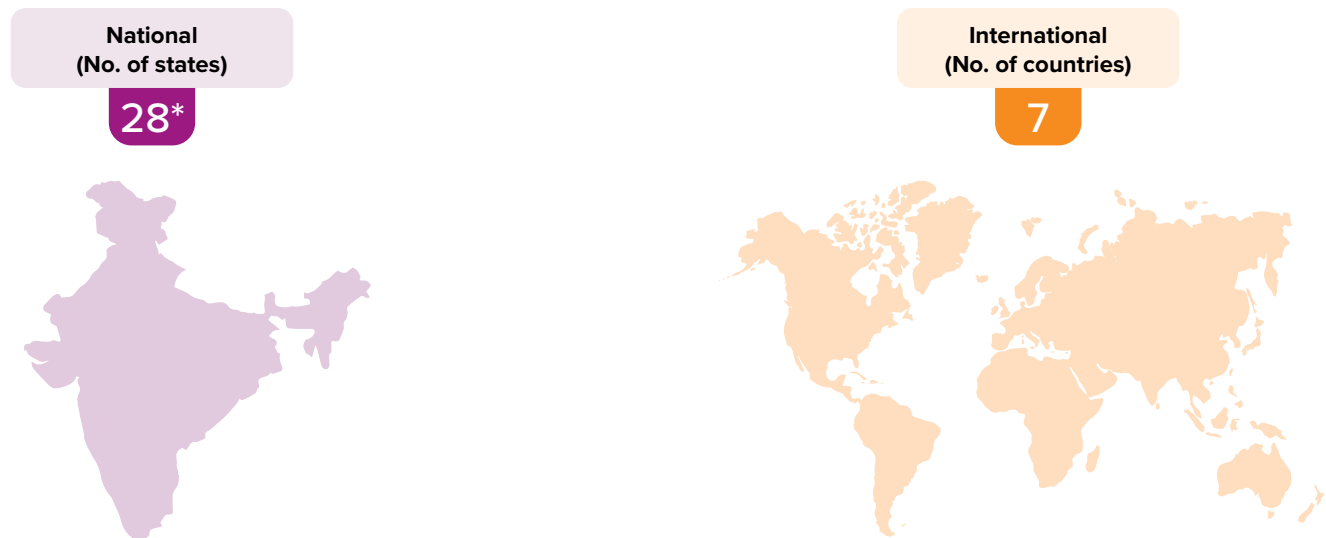
### III. Operations

#### 18 Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	26	4	30
International	-	-	-

#### 19 Markets served by the entity:

##### a. Number of locations



\*Includes Union Territories

**Disclaimer:** This map is a generalised illustration only for the ease of the reader to understand the locations, and it is not intended to be used for reference purposes. The representation of political boundaries and the names of geographical features/states do not necessarily reflect the actual position. The Company or any of its directors, officers or employees, cannot be held responsible for any misuse or misinterpretation of any information or design thereof. The Company does not warrant or represent any kind of connection to its accuracy or completeness.

##### b. What is the contribution of exports as a percentage of the total turnover of the entity?

Exports account for 2.41% of the Entity's total turnover.

##### c. A brief on types of customers



With over four decades of experience in serving the two, three, and four-wheeler segments, the Entity primarily operates through a Business-to-Business (B2B) model, focusing on Original Equipment Manufacturers (OEMs). The Entity's impressive client roster includes esteemed companies such as Mahindra & Mahindra, Bajaj Auto Limited, Honda Motors, Maruti Suzuki, Tata Motors, Toyota Kirloskar, VW, and among others.

#### IV. Employees

##### 1 Details as at the end of Financial Year:

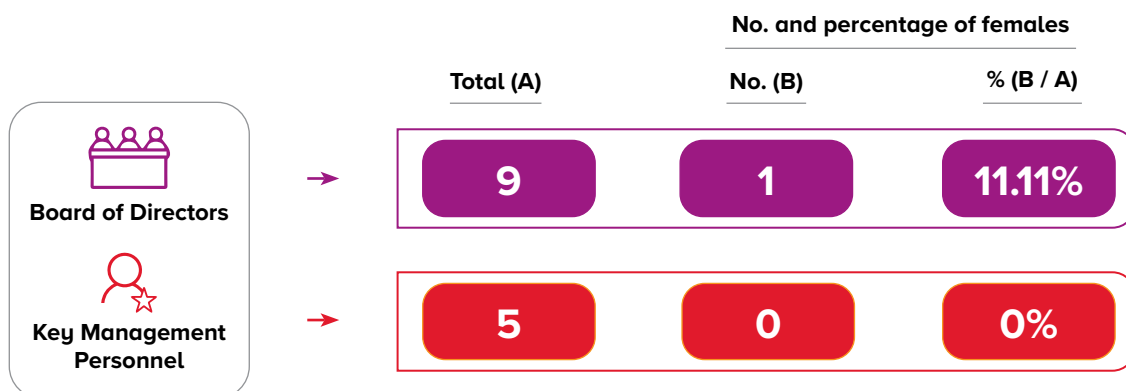
##### a. Employees and workers (including differently abled):

S. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>EMPLOYEES</b>						
1	Permanent (D)	1,472	1,404	95.38%	68	4.62%
2	Other than permanent (E)	1	-	-	1	100%
3	<b>Total employees (D + E)</b>	<b>1,473</b>	<b>1,404</b>	<b>95.32%</b>	<b>69</b>	<b>4.68%</b>
<b>WORKERS</b>						
4	Permanent (F)	754	717	95.09%	37	4.91%
5	Other than permanent (G)	6,878	5,691	82.74%	1,187	17.26%
6	<b>Total Workers (F + G)</b>	<b>7,632</b>	<b>6,408</b>	<b>83.96%</b>	<b>1,224</b>	<b>16.04%</b>

##### b. Differently abled Employees and workers:

S. no.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B/A)	No. (C)	% (C/A)
<b>DIFFERENTLY ABLED EMPLOYEES</b>						
1	Permanent (D)	1	1	100%	-	-
2	Other than permanent (E)	-	-	-	-	-
3	<b>Total differently abled employees (D + E)</b>	<b>1</b>	<b>1</b>	<b>100%</b>	-	-
<b>DIFFERENTLY ABLED WORKERS</b>						
4	Permanent (F)	-	-	-	-	-
5	Other than permanent (G)	11	6	54.55%	5	45.45%
6	<b>Total differently abled workers (F + G)</b>	<b>11</b>	<b>6</b>	<b>54.55%</b>	<b>5</b>	<b>45.45%</b>

##### 21 Participation/Inclusion/Representation of women



##### 22 Turnover rate for permanent employees and workers (Disclose trends for the past 3 years)

	FY 2023-24 (Turnover rate in current FY)			FY 2022-23 (Turnover rate in previous FY)			FY 2021-22 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
<b>Permanent employees</b>	17.83%	41.86%	18.95%	22.24%	46.34%	23.44%	20.48%	37.50%	21.46%
<b>Permanent workers</b>	18.39%	33.33%	18.98%	23.85%	77.78%	25.70%	30.33%	105.56%	33.00%

## V. Holding, Subsidiary and Associate Companies (including joint ventures)

### 23 (a) Names of holding/subsidiary/associate companies/joint ventures

S. no.	Names of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/subsidiary/associate/joint venture	% of shares held by Listed entity	Does the entity indicated at column A, participate in the business responsibility initiatives of the listed entity? (Yes/No)
1	Lumax Mannoh Allied Technologies Limited	Subsidiary	55	Yes
2	IAC International Automotive India Private Limited (IAC) (Formerly known as Lumax Integrated Ventures Private Limited)*	Subsidiary	75	Yes
3	Lumax Cornaglia Auto Technologies Private Limited	Subsidiary	50	Yes
4	Lumax Management Services Private Limited	Subsidiary	100	Yes
5	Lumax FAE Technologies Private Limited	Subsidiary	84	Yes
6	Lumax Jopp Allied Technologies Private Limited	Subsidiary	50	Yes
7	Lumax Yokowo Technologies Private Limited	Subsidiary	50	Yes
8	Lumax Alps Alpine India Private Limited	Subsidiary	50	Yes
9	Lumax Ituran Telematics Private Limited	Subsidiary	50	Yes
10	Lumax Ancillary Limited	Subsidiary	100	Yes
11	Lumax Resources Private Limited	Subsidiary	100	Yes

\*Earlier Lumax Integrated Ventures Private Limited (LIVE) was a wholly owned subsidiary of the Company and IAC International Automotive India Private Limited was a subsidiary Company of LIVE and was recognized as a material and step down subsidiary of the Company.

During FY 2023-24, the Scheme of Amalgamation was filed with Hon'ble National Company Law Tribunal (NCLT) for the Merger between IAC International Automotive India Private Limited (Transferor Company) and Lumax Integrated Ventures Private Limited (Transferee Company). The Scheme was approved by the Hon'ble NCLT vide its order dated February 16, 2024. The certified copy of the order was filed with Registrar of Companies (ROC) on March 18, 2024 and consequently the Transferor Company was dissolved without being wound up w.e.f. March 18, 2024 (Effective Date). Consequent to the Scheme becoming effective, the name of Lumax Integrated Ventures Private Limited was changed to IAC International Automotive India Private Limited on June 07, 2024.

## VI. CSR Details

### 24 (i) Whether CSR is applicable as per Section 135 of Companies Act, 2013: (Yes/No)

Yes

### (ii) Turnover (in ₹)

₹ 2,82,173.58 Lakhs

### (iii) Net worth (in ₹)

₹ 78,960.89 Lakhs

## VII. Transparency and Disclosures Compliances

### 25 Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance redressal mechanism in place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2023-24 (Current financial year)			FY 2022-23 (Previous financial year)		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	No	NIL	NIL	-	NIL	NIL	-
Investors (other than shareholders)	No	NIL	NIL	-	NIL	NIL	-
Shareholders*	Yes	3	NIL	-	NIL	NIL	-
Employees and workers	Yes	1	1	Not maintainable complaint	NIL	NIL	-
Customers	Yes	190	NIL	-	75	NIL	-
Value chain Partners	No	NIL	NIL	-	NIL	NIL	-
Other (please specify)	-	-	-	-	-	-	-

All complaints were resolved within the respective quarters.

\*While there is no specific policy for shareholder grievance redressal, information on online resolution of disputes in the Indian securities market through the Online Dispute Resolution (ODR) portal is available on the Entity's website. Link: <https://www.lumaxworld.in/lumaxautotech/online-dispute-resolution.html>

The Entity's stakeholders include customers, suppliers, employees/workers, business partners, the Board of Directors, promoters, government entities, institutions/industry bodies, the community, society, and investors. The Entity has a robust grievance redressal mechanism with various policies and procedures in place across all operations. For instance, it has a well-defined Vigil Mechanism/Whistle Blower Policy, an Anti-Bribery Policy, and a Policy on Prevention of Sexual Harassment of Women at the Workplace for all female employees, which allows for the expression of concerns and grievances. Additionally, there is an escalation matrix for addressing the grievances of the Entity's productive suppliers, while the Legal and Secretarial Department manages grievances of other stakeholders.

## 26 Overview of the entity's material responsible business conduct issues.










Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format



Opportunity



Risk













S. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity
1.	Waste Management 	 	<p><b>Opportunity</b></p> <ol style="list-style-type: none"> <li>To enhance operational efficiency and reduce costs.</li> <li>To generate additional revenue streams and improve environmental footprint</li> </ol> <p><b>Risk</b></p> <ol style="list-style-type: none"> <li>Initial investments and operational adjustments may temporarily impact profitability and operational efficiency.</li> <li>Overcoming technological barriers requires strategic planning and resource allocation.</li> </ol>
2.	Water Management 	 	<p><b>Opportunity:</b> Responsible environmental stewardship, corporate sustainability goals</p> <p><b>Risk:</b> As freshwater sources deplete, their critical role in the Entity's operations—such as production and cooling systems—becomes increasingly vital. The risk of water shortages or contamination can severely disrupt operations, making effective water management essential.</p>
3.	Energy Management 	 	<p><b>Opportunity:</b></p> <ol style="list-style-type: none"> <li>To reduce dependency on non- renewable energy sources.</li> <li>To enhance operational resilience, reducing downtime risk.</li> <li>To meet stakeholder expectations and support environmental Stewardship.</li> <li>To educate employees and create awareness.</li> </ol> <p><b>Risk:</b></p> <ol style="list-style-type: none"> <li>Dependence on new technologies for energy management may cause reliability issues, maintenance costs, and potential compatibility challenges with existing systems.</li> <li>Initial investments and operational adjustments may temporarily impact profitability.</li> </ol>













In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
<p><b>Adaptation/mitigation measures:</b></p> <ol style="list-style-type: none"> <li>1. Strategic Investment Planning</li> <li>2. Adaptive Compliance Strategy</li> <li>3. Technology and Innovation Adoption.</li> <li>4. Continuous Improvement and adaptation.</li> </ol>	<p><b>Positive Implications:</b></p> <p>Implementing robust waste management practices allows the Entity to streamline operations, reduce costs, and enhance resource efficiency. This ensures compliance with regulations and strengthens the Entity’s reputation as a responsible corporate citizen. This commitment fosters innovation and new revenue streams through initiatives in recovery and recycling.</p> <p><b>Negative Implications:</b></p> <p>Upgrading facilities and implementing new waste management technologies can require significant upfront investments.</p> <p>Depending on the complexity of waste types involved, the Entity may require specialized knowledge for effective waste management.</p>
<p><b>Adaptation/Mitigation Measures:</b></p> <ol style="list-style-type: none"> <li>1. Conduct thorough evaluations to identify potential water-related risks and vulnerabilities within operations.</li> <li>2. Expanding water-saving equipment and technologies &amp; wastewater treatment facilities.</li> <li>3. Regular Maintenance and Monitoring</li> <li>4. Exploring alternative water sources such as rainwater harvesting and greywater reuse to meet operational needs.</li> </ol>	<p><b>Positive Implications:</b></p> <ol style="list-style-type: none"> <li>1. Implementing efficient water management practices can lead to significant cost savings by reducing water consumption, minimizing wastewater treatment costs, and optimizing operational processes.</li> <li>2. Helps to mitigate financial risks associated with water scarcity &amp; potential disruptions to operations due to water-related issues.</li> </ol> <p><b>Negative Implications:</b></p> <p>Water shortages or contamination can halt production processes, leading to costly downtime, delays, and reduced output. Prolonged operational disruptions due to these issues can further elevate expenses.</p>
<p><b>Adaptation/Mitigation Measures:</b></p> <ol style="list-style-type: none"> <li>1. Thorough assessment to identify potential risks during the pre-implementation phase.</li> <li>2. Phased approach &amp; smaller scale implementations before full-scale deployment.</li> </ol>	<p><b>Positive Implications:</b></p> <ol style="list-style-type: none"> <li>1. Effective energy management leads to significant cost savings over time through reduced energy consumption.</li> <li>2. Commitment to energy efficiency and sustainability strengthens investor, customer, relationships, potentially boosting brand loyalty, and financial performance.</li> <li>3. Reducing reliance on non-renewable energy helps to avoid energy price volatility and supply disruptions, ensuring stable operational costs.</li> </ol> <p><b>Negative Implications:</b></p> <p>Upfront investments and Initial costs associated with energy management initiatives can be substantial.</p>

S. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity
4.	GHG Emissions 	 	<p><b>Opportunity:</b> Advancing environmental stewardship and achieving corporate sustainability goals</p> <p><b>Risk:</b> Addressing Scope 3 greenhouse gas (GHG) emissions throughout the value chain, in collaboration with partners, presents significant challenges.</p>
5.	Occupational Health and Safety 	 	<p><b>Opportunity :</b></p> <ol style="list-style-type: none"> <li>To create a safer, more efficient workplace and enhance organizational resilience.</li> <li>To prevent Risks &amp; safety Incidents</li> </ol> <p><b>Risk:</b></p> <ol style="list-style-type: none"> <li>Poor occupational health and safety (OHS) practices can lead to workplace accidents, injuries, and health issues, severely impacting employee well-being and productivity. These incidents not only affect individual employees but can also disrupt operations, halt production, and cause significant delays.</li> </ol>
6.	Employee Wellbeing 		<p><b>Opportunity :</b></p> <ol style="list-style-type: none"> <li>Improves employee morale, satisfaction, and retention.</li> <li>Enhances employee engagement &amp; motivation and fosters a positive work environment</li> </ol>
7.	Customer Satisfaction 		<p><b>Opportunity :</b></p> <ol style="list-style-type: none"> <li>Repeat business and loyalty</li> <li>Customer retention</li> <li>Operational efficiency</li> </ol>

In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
<p><b>Adaptation/Mitigation Measures:</b></p> <ol style="list-style-type: none"> <li>1. Transparent communication and collaboration with suppliers</li> <li>2. Effective data collection and management system to be in place for comprehensive data gathering from diverse suppliers.</li> <li>3. Education &amp; training programs to foster a culture of sustainability throughout the supply chain.</li> <li>4. Regular monitoring and review mechanisms to ensure compliance and continuous improvement.</li> </ol>	<p><b>Positive Implications:</b></p> <ol style="list-style-type: none"> <li>1. Calculating Scope 3 emissions leads to potential cost savings and improved operational efficiency within the supply chain.</li> <li>2. Collaborating with suppliers on sustainability goals can foster stronger partnerships potentially leading to increased trust, and long-term financial benefits.</li> </ol> <p><b>Negative Implications:</b></p> <ol style="list-style-type: none"> <li>1. Ensuring the accuracy of Scope 3 emissions data can be costly requiring investments in data collection and management systems.</li> <li>2. Effectively engaging suppliers in the emissions calculation process may require additional resources &amp; training.</li> </ol>
<p><b>Adaptation/Mitigation Measures:</b></p> <ol style="list-style-type: none"> <li>1. Regular training for employees on safety procedures and protocols.</li> <li>2. Developing emergency response plans to adapt to unexpected incidents</li> <li>3. Create and enforce comprehensive safety policies.</li> <li>4. Conduct Regular Safety Audits</li> </ol>	<p><b>Positive Implications :</b></p> <ol style="list-style-type: none"> <li>1. Lower accident rates lead to fewer downtime incidents, reducing costs associated with injuries.</li> <li>2. Improved safety practices can result in reduced insurance premiums leading to direct financial savings.</li> <li>3. Higher employee morale and retention rates decrease turnover costs.</li> </ol> <p><b>Negative Implications:</b></p> <ol style="list-style-type: none"> <li>1. OHS practices, if not implemented effectively can lead to unexpected financial losses ( eg. penalties for non-compliance)</li> <li>2. Maintenance and Upkeep Costs of Safety equipment and facilities.</li> <li>3. Employee dissatisfaction leads to reduced productivity.</li> </ol>
-	<p><b>Positive Implications:</b></p> <p>Prioritizing employee well-being enhances productivity, and nurtures a positive workplace culture for the Entity. This helps in talent attraction, improved productivity, and lower turnover costs, mitigating risks associated with absenteeism. While initial investments and ongoing operational costs are considerations, the long-term financial gains include improved efficiency, lower healthcare expenses, and strengthened stakeholder trust.</p>
-	<p><b>Positive Implications:</b></p> <p>Customer satisfaction is pivotal for us, yielding numerous positive outcomes such as repeat business, enhanced loyalty, and streamlined marketing efforts. However, we acknowledge that neglecting customer satisfaction can lead to increased operational costs from handling issues such as complaints and returns. Thus, maintaining high levels of customer satisfaction is always a top priority.</p>

S. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity
8.	DEI 	 	<p><b>Opportunity:</b></p> <ol style="list-style-type: none"> <li>1. A culture of innovation and creativity, leading to new perspectives and ideas that drive product development.</li> <li>2. Improved customer engagement and market differentiation.</li> </ol> <p><b>Risk:</b></p> <p>Poorly executed DEI efforts may inadvertently create a negative impact on teamwork and collaboration.</p>
9.	R&D 		<p><b>Opportunity :</b></p> <p>R&amp;D and innovation are essential for developing superior products and can potentially help create innovative solutions, increase efficiency and reduce environmental impact.</p>
10.	CSR 		<p><b>Opportunity :</b></p> <p>Engaging in Corporate Social Responsibility (CSR) initiatives can help enhance community relations by demonstrating our commitment to responsible corporate citizenship.</p>
11.	Code of Conduct 		<p><b>Opportunity :</b></p> <p>The Code of Conduct of a business enhances corporate governance and ethical standards, mitigates risks, improves operational efficiency, and strengthens stakeholder relationships.</p>
12.	Regulatory Compliance 	 	<p><b>Opportunity:</b></p> <p>Regulatory compliance is critical for industry's strict safety, environmental, and quality standards. Maintaining regulatory compliance ensures the Entity avoids costly fines, penalties, and legal fees associated with non-compliance.</p> <p><b>Risk:</b></p> <p>Non-compliance or regulatory violations can damage the Entity's reputation, leading to customer distrust along with fees &amp; penalty costs. This can negatively impact revenue and long-term sustainability.</p>

In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
<p><b>Mitigation measures:</b></p> <ol style="list-style-type: none"> <li>1. Impart mandatory training on DEI principles, unconscious bias, and respectful workplace practices for all employees.</li> <li>2. Develop and communicate clear DEI policies, guidelines, and procedures.</li> </ol>	<p><b>Positive Implications :</b></p> <ol style="list-style-type: none"> <li>1. Embracing DEI initiatives brings diverse perspectives and can lead to better problem-solving and product development.</li> <li>2. A strong DEI focus helps attract and retain a broader range of talent improving overall workforce quality</li> </ol> <p><b>Negative Implications:</b></p> <ol style="list-style-type: none"> <li>1. Developing and maintaining DEI programs may require significant investments in training, policy development, and monitoring.</li> <li>2. Poorly implemented DEI initiatives can backfire, leading to damage to the company's reputation if perceived as insincere or ineffective.</li> </ol>
	<p><b>Positive Implications:</b></p> <p>Investing in Research and Development (R&amp;D) is essential for the Entity, providing opportunities to innovate products, enhance customer satisfaction, improve cost efficiency, and adopt new technologies. These initiatives position the Entity as a progressive and trusted partner for its customers.</p>
	<p><b>Positive Implications:</b></p> <p>Engaging in social responsibility initiatives strengthens the organization's ties with the community, promoting collaboration and mutual prosperity. These efforts have a positive impact on the community, fostering goodwill and deepening loyalty.</p>
	<p><b>Positive Implications:</b></p> <p>Establishing and adhering to a robust Code of Conduct enhances the company's reputation as a trustworthy and ethical organization, leading to increased customer loyalty and improved brand perception. Clear guidelines and ethical standards reduce legal risks. Also, a well-defined Code of Conduct fosters a positive work environment.</p>
<p><b>Mitigation Measures:</b></p> <ol style="list-style-type: none"> <li>1. Compliance monitoring and audits</li> <li>2. Employee training and Awareness</li> <li>3. Engagement with regulatory authorities</li> <li>4. Regular risk assessments</li> </ol>	<p><b>Positive Implications:</b></p> <ol style="list-style-type: none"> <li>1. Proactively managing regulations minimizes the risk of fines, penalties, and legal issues, safeguarding the Entity's financial health</li> <li>2. Commitment to regulatory compliance builds trust with investors, customers, and regulators, strengthening relationships</li> <li>3. Compliance ensures the Entity operates legally, providing a solid foundation for sustainable, long-term growth</li> </ol> <p><b>Negative Implications:</b></p> <ol style="list-style-type: none"> <li>1. Failing to meet regulations can lead to fines, lawsuits, and financial penalties.</li> <li>2. Non-compliance can damage the Entity's reputation and potential revenue loss.</li> </ol>

S. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity
13.	Risk & Crisis Management 		<b>Opportunity :</b> 1. To strengthen resilience against potential disruption. 2. Pre-planning and anticipating risks not only mitigates potential threats but also positions the Entity as reliable and prepared.
14.	Data Security 	 	<b>Opportunity:</b> A secure data system reduces the risk of cyberattacks, minimizing downtime and maintaining productivity.  <b>Risk:</b> Keeping up with evolving standards and continuously monitoring & updating security protocols can be complex and resource intensive.
15.	Sustainable Procurement 	 	<b>Opportunity:</b> Commitment towards corporate sustainability goals.  <b>Risk:</b> Ensuring that all suppliers meet sustainability criteria can complicate supply chain management.
16.	Stakeholder Management 		<b>Opportunity :</b> 1. Building trust and positive relationships with stakeholders 2. Engaging stakeholders in decision-making processes and addressing their concerns help mitigate risks.

In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
-	<p><b>Positive Implications :</b></p> <p>Effective risk and crisis management strategies mitigate financial losses, enhance resilience, lower insurance costs, and bolster investor confidence. Proactive measures like risk assessments, crisis planning, training, and transparent communication ensure readiness, safeguarding reputation and operational continuity.</p>
<p><b>Mitigation measures:</b></p> <ol style="list-style-type: none"> <li>To conduct regular security audits and ensure continuous monitoring to detect and address vulnerabilities promptly.</li> <li>To organize training programs to ensure employees are aware of security protocols and can recognize potential threats</li> </ol>	<p><b>Positive Implications:</b></p> <ol style="list-style-type: none"> <li>Effective data security boosts customer confidence leading to greater loyalty and repeat business.</li> <li>A strong track record in data security improves the Entity's reputation, strengthening brand credibility.</li> <li>Data security measures enhance overall operational efficiency and reliability</li> </ol> <p><b>Negative Implications:</b></p> <p>Implementing and maintaining robust data security measures requires continuous investment in technology and can be resource intensive.</p>
<p><b>Mitigation Measures:</b></p> <ol style="list-style-type: none"> <li>Improve close relationships with suppliers to ensure alignment on sustainability goals and practices.</li> <li>Provide training and support to suppliers to help them to meet standards.</li> <li>Conduct regular audits of suppliers to ensure compliance with sustainability standards</li> <li>Incorporate sustainability requirements into contracts and Service Level Agreements (SLAs) with clear expectations and consequences for non-compliance</li> </ol>	<p><b>Positive Implications:</b></p> <ol style="list-style-type: none"> <li>Sustainable procurement improves resource use and reduces waste, boosting overall operational efficiency.</li> <li>Sustainable procurement enhances competitive advantage, potentially increasing profits.</li> </ol> <p><b>Negative Implications:</b></p> <ol style="list-style-type: none"> <li>Sustainable practices can add complexity to the supply chain, needing more coordination and management.</li> <li>Challenges need strong supplier collaboration, cost control, and technology investments.</li> </ol>
-	<p><b>Positive Implications:</b></p> <p>Stakeholder management is crucial for maintaining customer satisfaction, attracting investors, and fostering community relations. By prioritizing effective communication, transparency, and responsiveness to stakeholder needs, the Entity can optimize financial performance, mitigate risks, and capitalize on growth opportunities in a competitive market environment.</p>

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

S. no	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>										
1	a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	c. Web Link of the policies, if available	<p>The policies mandated by the Companies Act, 2013, and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, can be accessed on the Company's website:  <a href="https://www.lumaxworld.in/lumaxautotech/policies.html">https://www.lumaxworld.in/lumaxautotech/policies.html</a></p> <p>Other internal policies are available within the Entity and are not accessible to the public.</p>								
2	Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3	Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes, some of the Entity policies such as Vigil Mechanism/Whistleblower Policy are extended to Entity's value chain partners.								
4	Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	<ul style="list-style-type: none"> <li>• IATF 16949:2016 (Automotive Quality Management System)</li> <li>• ISO 14001:2015 (Environment Management System)</li> <li>• ISO 45001:2018 (Occupational health and safety management systems)</li> <li>• ISO 27001:2022 (Information security management systems)</li> <li>• ISO 50001:2018 (Energy management)</li> <li>• ISO 9001:2015 (Quality management system (QMS))</li> </ul>								
5	Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Entity has developed an ESG Roadmap with clear commitments, goals, targets, and identified Environmental and Social KPIs. The following targets were set at the end of FY 2023-24 with a timeline of three years.</p> <ol style="list-style-type: none"> <li>1. Waste Management as per 3'R</li> <li>2. Water Neutral</li> <li>3. To source 100% of energy requirement through Renewable Sources (by FY2027-2028).</li> <li>4. Zero Fatality</li> <li>5. Employee survey, Employee redressal mechanism</li> <li>6. To increase females by 25% in total workforce.</li> <li>7. Zero Tolerance towards violation of Code of Conduct</li> <li>8. To implement Customer Satisfaction Survey and score, customer complaints redressal mechanism.</li> <li>9. 100% mitigation of identified risks</li> <li>10. Zero data security breaches.</li> <li>11. 100% adherence to the Sustainable procurement policy.</li> </ol>								



S. no	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6	Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met	The Entity has developed a strategic plan aimed at achieving specific commitments, goals, and targets for the upcoming years. This plan outlines proactive measures and initiatives to be undertaken. The Entity is focused on executing this new plan effectively, with the goal of achieving the desired outcomes and enhancing performance in the forthcoming reporting periods.								
<b>Governance, leadership, and oversight</b>										
7	Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	Lumax's long-term strategy is grounded in ESG principles, which emphasize creating value for stakeholders, including people, communities, and the planet. For Lumax, ESG is about making a meaningful impact rather than merely meeting criteria. The entity is dedicated to people, communities, and the planet, and as the leading global provider of automotive lighting, Lumax's mission and core values guide its actions and help it stay focused on what matters most. The Board of Directors has approved a three-year ESG roadmap and strategy. Achievements and objectives related to ESG are detailed in the ESG section of this Annual Report.								
8	Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr Sanjay Mehta, the Director of the Company, is responsible for implementation and oversight of the business responsibility policies. Name: Mr Sanjay Mehta Designation: Director DIN: 06434661 Telephone: 0124-4760000 E-mail : <a href="mailto:contactbrsr.latl@lumaxmail.com">contactbrsr.latl@lumaxmail.com</a>								
9	Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	No specified Committee of the Board has been formed to handle sustainability-related issues. However, Mr Sanjay Mehta, Director, is responsible for decision-making on sustainability-related issues. Name: Mr Sanjay Mehta Designation: Director DIN: 06434661 Telephone: 0124-4760000 E-mail : <a href="mailto:contactbrsr.latl@lumaxmail.com">contactbrsr.latl@lumaxmail.com</a>								

#### 10 Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee									Frequency (Annually/half yearly/ quarterly/any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
Performance against above policies and follow up action	Yes, the Company's policies are regularly evaluated by the Department Heads, Business Heads, and Executive Directors to assess their efficacy and implement any necessary modifications. This process ensures updated procedures are promptly enacted to maintain the relevance and effectiveness of the policies.									Need-based								
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Entity is fully compliant with all statutory requirements relevant to the Principles. Any instances of non-compliance will be promptly and effectively addressed by the Board.									Need-based								

	P1	P2	P3	P4	P5	P6	P7	P8	P9
11 Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	No, the Entity has not carried out any independent assessment/evaluation of the workings of its policies by an external agency.								

	P1	P2	P3	P4	P5	P6	P7	P8	P9
12 If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:	Not Applicable								
The entity does not consider the principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									



## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

### PRINCIPLE

1

Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

### Essential Indicators

#### 1 Percentage coverage by training and awareness programmes on any of the Principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes
Board of Directors	2	Sustainability Awareness	100%
Key Managerial Personnel	2	- Sustainability Awareness - Corporate Governance	100%
Employees other than BoD and KMP	80	<ul style="list-style-type: none"> <li>• POSH Awareness</li> <li>• ESG &amp; Sustainability</li> <li>• GHG Accounting (Carbon Emission Assessment)</li> <li>• Technical Updates (Accounting, Auditing &amp; Relevant Regulatory)</li> <li>• Prohibition of Insider Trading &amp; Awareness Session</li> <li>• New Policies &amp; Guidelines</li> <li>• SAP Module Trainings</li> <li>• Fire Safety Training</li> <li>• Budget Meeting-Functional Training</li> <li>• Sessions on Goal Setting</li> <li>• Cyber Security Awareness &amp; Training Program</li> <li>• Quality Function Development (QFD) Awareness Sessions</li> <li>• Low-Cost Automation-Supplier Capability Building-Training Announcements</li> <li>• Training to Managers on Performance Management System (PMS)</li> <li>• MS Excel Training</li> <li>• Training on ISO 50001: 2018</li> </ul>	43.27%

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Workers	31	<b>Health and safety awareness:</b> <ul style="list-style-type: none"> <li>- Health Trainings</li> <li>- Yoga Sessions</li> <li>- Safety Trainings</li> <li>- Fire Trainings</li> </ul> <b>Skill Upgradation:</b> <ul style="list-style-type: none"> <li>- MS Excel</li> </ul> <b>POSH Awareness</b>	65.12%

**2 Details of fines/penalties/punishment/award/compounding fees/settlement amount paid in proceedings (by the entity or by directors/KMPs) with regulators/law enforcement agencies/judicial institutions, in the financial year, in the following format.**

**(Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure obligations) Regulations, 2015 and as disclosed on the entity's website):**

	Monetary				
	NGRBC principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (In ₹)	Brief of the case	Has an appeal been preferred? (Yes/No)
Penalty/fine	Principle 4	Collector of Stamps (Karol Bagh), Office of The Sub-divisional Magistrate (Karol Bagh), Government of NCT of Delhi	1,49,271	There was a delay in submitting the application with the Office of the Sub-divisional Magistrate (Karol Bagh), Government of NCT of Delhi, concerning the Amalgamation Order passed by the Hon'ble National Company Law Tribunal, Delhi Bench, for the merger of Lumax Metallica Private Limited (Transferor Company) into Lumax Auto Technologies Limited (Transferee Company). Consequently, an Order dated March 06, 2024, directed the payment of stamp duty of ₹ 14,92,710/- and penalty of ₹ 1,49, 271/- aggregating to ₹ 16,41,981/- was passed, for which the Company had made the payment.	No

	Monetary				
	NGRBC principle	Name of the regulatory/enforcement agencies/judicial institutions	Amount (In ₹)	Brief of the case	Has an appeal been preferred? (Yes/No)
Settlement			Nil		
Compounding fee			Nil		

	Non-monetary			
	NGRBC Principle	Name of the regulatory/enforcement agencies/judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment			Nil	
Punishment			Nil	

**3 Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.**

Case details	Name of the regulatory/enforcement agencies/judicial institutions
There were no cases where monetary or non-monetary actions have been appealed.	



**4 Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.**

Yes, the Entity has an Anti-Corruption and Bribery Policy. The Entity is committed to upholding high standards of business conduct and corporate governance, adhering to a zero-tolerance approach towards bribery and corruption. This policy establishes robust procedures to prevent any involvement in bribery, corruption, or facilitation payments. It is mandatory for all employees and business partners working on behalf of the Entity globally.

**5 Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:**

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

There were no instances of any disciplinary action taken by a law enforcement agency for the charges of bribery/corruption against Directors/ KMP/employees/workers.

**6 Details of complaints with regard to conflict of interest:**

	FY 2023-24 (Current Financial Year)		FY 2022-23 (Previous Financial Year)	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	-	Nil	-
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	-	Nil	-

There were no complaints reported with regard to conflict of interest during the reporting period.

**7 Provide details of any corrective action taken or underway on issues related to fines/penalties/action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.**

There were no instances of corruption or conflicts of interest reported during the current financial year. Hence no corrective actions were planned.

**8 Number of days of accounts payables ((Accounts payable \*365)/Cost of goods/services procured) in the following format:**

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Number of days of accounts payables	83.36	95.70

**9 Open-ness of business:**

**Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:**

Parameter	Metrics	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Concentration of purchases	a) Purchases from trading houses as % of total purchases	-	-
	b) Number of trading houses where purchases are made from	-	-
	c) Purchases from top 10 trading houses as % of total purchases from trading houses	-	-
Concentration of sales	a) Sales to dealers/distributors as % of total sales	14.04%	19.96%
	b) Number of dealers/ distributors to whom sales are made	435	419
	c) Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors	21.49%	23.19%
Share of RPTs in	a) Purchases (Purchases with related parties/Total purchases)	13.48%	19.05%
	b) Sales (Sales to related parties / Total sales)	8.74%	9.81%
	c) Loans & advances (Loans & advances given to related parties/ Total loans & advances)	-	-
	d) Investments (Investments in related parties/Total investments made)	36.93%	51.29%

**Leadership Indicators**

**1 Awareness programmes conducted for value chain partners on any of the Principles during the financial year:**

Total number of awareness programmes held	Topics/principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
4	<ol style="list-style-type: none"> <li>1. Problem Solving G8D</li> <li>2. IAC PPAP Requirements</li> <li>3. PFMEA</li> <li>4. Process Change Management</li> </ol>	4.45%
1	New Program SOP Readiness & End-Customer Expectations	3.18%

**2 Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same**



Yes, the Entity has a Code of Conduct for the Board of Directors and Senior Management, outlining their roles and responsibilities. This Code requires them to always act in good faith to advance the Entity's business and objectives for the benefit of all stakeholders, prioritizing the interests of the Entity, its employees, shareholders, and the community. They must avoid any business, relationships, or activities that could conflict with the Entity's interests. In the event of a potential conflict of interest, they are required to fully disclose all relevant details to the Board of Directors and the Audit Committee.

**PRINCIPLE**

**2**

Businesses should provide goods and services in a manner that is sustainable and safe

**Essential Indicators**

- 1 Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

	Current Financial Year 2023-24	Previous Financial Year 2022-23	Details of improvements in environmental and social impacts
R&D	-	-	-
Capex	0.06%	-	Some of the specific areas that were identified by the entity are: <ul style="list-style-type: none"> <li>• Rainwater harvesting</li> <li>• Cooling towers</li> </ul>

- 2 a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**  
No, the Entity is currently assessing options for implementing sustainable sourcing procedures as part of its sustainability initiatives.
- b. If yes, what percentage of inputs were sourced sustainably?**  
Not Applicable

- 3 Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**



The Entity's products are delivered directly to OEMs, limiting its ability to reclaim them at the end of their life cycle. However, the Entity actively participates in the Extended Producer Responsibility (EPR) system for the plastics used in its product, packaging, and distribution processes. Given that plastics can take various disposal pathways, their direct reclamation becomes challenging. Through the EPR process, the Entity ensures that these materials are recycled, reused, or recovered at their final disposal stage.

- 4 Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No)**  
Yes
- If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same**  
EPR registration of the Plants under Importer Category and Brand Owner Category have been obtained, wherever applicable, except the 3 Plants for which the registration under Brand Owner Category is in process.

**Leadership Indicators**

- 1 Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

NIC Code	Name of Product/ Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
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The Entity is currently assessing the feasibility of conducting life cycle assessment (LCA) for its products





**PRINCIPLE**

**3**

Businesses should respect and promote the well-being of all employees, including those in their value chains

**Essential Indicators**

**1 a. Details of measures for the well-being of employees:**

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent employees</b>											
Male	1,404	1,404	100%	1,404	100%	-	-	1,404	100%	-	-
Female	68	68	100%	68	100%	68	100%	-	-	5	7.35%
<b>Total</b>	<b>1,472</b>	<b>1,472</b>	<b>100%</b>	<b>1,472</b>	<b>100%</b>	<b>68</b>	<b>4.62%</b>	<b>1,404</b>	<b>95.38%</b>	<b>5</b>	<b>0.34%</b>
<b>Other than permanent employees</b>											
Male	-	-	-	-	-	-	-	-	-	-	-
Female	1	1	100%	1	100%	1	100%	-	-	-	-
<b>Total</b>	<b>1</b>	<b>1</b>	<b>100%</b>	<b>1</b>	<b>100%</b>	<b>1</b>	<b>100%</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

**b. Details of measures for the well-being of workers:**

Category	% of worker covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent workers</b>											
Male	717	717	100%	717	100%	-	-	236	32.91%	-	-
Female	37	37	100%	37	100%	37	100%	-	-	-	-
<b>Total</b>	<b>754</b>	<b>754</b>	<b>100%</b>	<b>754</b>	<b>100%</b>	<b>37</b>	<b>4.91%</b>	<b>236</b>	<b>31.30%</b>	<b>-</b>	<b>-</b>
<b>Other than permanent workers</b>											
Male	5,691	5,691	100%	5,691	100%	-	-	-	-	-	-
Female	1,187	1,187	100%	1,187	100%	1,187	100%	-	-	121	10.19%
<b>Total</b>	<b>6,878</b>	<b>6,878</b>	<b>100%</b>	<b>6,878</b>	<b>100%</b>	<b>1,187</b>	<b>17.26%</b>	<b>-</b>	<b>-</b>	<b>121</b>	<b>1.76%</b>

**c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format –**

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Cost incurred on well-being measures as a % of total revenue of the company	0.09%	0.07%

**2 Details of retirement benefits, for Current FY and Previous Financial Year.**

Benefits	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	No. of employees covered as a % of total employees	No. of workers Covered as a % of total workers	Deducted and Deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers Covered as a % of total workers	Deducted and Deposited with the authority (Y/N/N.A.)
PF	100%	100%	Y	100%	100%	Y
Gratuity	100%	100%	Y	100%	100%	Y
ESI*	100%	100%	Y	100%	100%	Y

Note: \*All applicable employees, as required by the Act, were covered.

### 3 Accessibility of workplaces.

Are the premises/offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

The Entity's premises and offices are accessible to differently abled employees and workers, although some locations and manufacturing facilities may have limited access due to safety considerations and the specific design and structure of those areas.



### 4 Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

Yes, the Entity has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016, which is accessible internally within the Entity and is not available to the public.

### 5 Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers*	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100%	0.00%	Not Applicable	Not Applicable
Female	50%	-	Not Applicable	Not Applicable
<b>Total</b>	<b>92.86%</b>	<b>0.00%</b>		

Note: \*In FY 2023-24, No permanent workers utilized parental leave.

### 6 Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

Yes/No

(If Yes, then give details of the mechanism in brief)

<b>Permanent workers</b>	→ Yes, a Vigil Mechanism/Whistle Blower Policy has been established to receive and address grievances. This policy is accessible to all permanent employees and workers and provides adequate protection against unfair treatment for those who raise concerns. It also allows direct contact with the Chairman of the Audit Committee in appropriate or exceptional cases. Additionally, an Employee App is available which enables easy registration and tracking of grievances.
<b>Other than permanent workers</b>	→
<b>Permanent employees</b>	→
<b>Other than permanent employees</b>	→ Not Available

### 7 Membership of employees and worker in association(s) or Unions recognized by the listed entity:

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D / C)
<b>Total permanent employees</b>	<b>1,472</b>	-	-	<b>865</b>	-	-
Male	1,404	-	-	827	-	-
Female	68	-	-	38	-	-

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Total employees/workers in respective category (A)	No. of employees/workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees/workers in respective category (C)	No. of employees/workers in respective category, who are part of association(s) or Union (D)	% (D / C)
<b>Total permanent workers</b>	<b>754</b>	<b>408</b>	<b>54.11%</b>	<b>551</b>	<b>231</b>	<b>41.92%</b>
Male	717	404	56.35%	529	228	43.10%
Female	37	4	10.81%	22	3	13.64%

### 8 Details of training given to employees and workers:

Category	FY 2023-24 (Current Financial Year)					FY 2022-23* (Previous Financial Year)				
	Total (A)	On health and safety measures		On skill upgradation		Total (D)	On health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Male	1,404	700	49.86%	650	46.30%	827	367	44.38%	228	27.57%
Female	68	50	73.53%	42	61.76%	38	31	81.58%	17	44.74%
<b>Total</b>	<b>1,472</b>	<b>750</b>	<b>50.95%</b>	<b>692</b>	<b>47.01%</b>	<b>865</b>	<b>398</b>	<b>46.01%</b>	<b>245</b>	<b>28.32%</b>
<b>Workers</b>										
Male	717	419	58.44%	457	63.74%	529	301	56.90%	301	56.90%
Female	37	35	94.59%	34	91.89%	22	20	90.91%	19	86.36%
<b>Total</b>	<b>754</b>	<b>454</b>	<b>60.21%</b>	<b>491</b>	<b>65.12%</b>	<b>551</b>	<b>321</b>	<b>58.26%</b>	<b>320</b>	<b>58.08%</b>

Note: \*FY 2022-23 data has been corrected due to change in calculation methodology.

### 9 Details of performance and career development reviews of employees and worker:

Category	FY 2023-24 (Current Financial Year)			FY 2022-23* (Previous Financial Year)		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
<b>Employees</b>						
Male	1,404	1,300	92.59%	827	719	86.94%
Female	68	55	80.88%	38	33	86.84%
<b>Total</b>	<b>1,472</b>	<b>1,355</b>	<b>92.05%</b>	<b>865</b>	<b>752</b>	<b>86.94%</b>
<b>Workers</b>						
Male	717	474	66.11%	529	459	86.77%
Female	37	27	72.97%	22	19	86.36%
<b>Total</b>	<b>754</b>	<b>501</b>	<b>66.45%</b>	<b>551</b>	<b>478</b>	<b>86.75%</b>

Note: \*FY 2022-23 data has been corrected due to change in calculation methodology.

### 10 Health and safety management system:

**a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage of such system?**

Yes, the Entity has integrated an Occupational Health and Safety Management System as a vital aspect of its operations. The primary goal is to foster a work environment that prioritizes the health and safety of employees while adhering to principles of environmental sustainability. To achieve this, the Entity has established comprehensive mechanisms, including the continuous enhancement of environmental occupational health and safety performance, striving for an incident-free work environment, reducing waste to conserve natural resources, ensuring compliance with legal requirements, proper disposal of waste and pollutants, and promoting innovation to prevent pollution, injury, and illness. Furthermore, the Entity is ISO 45001 certified, covering 30% of its plants, underscoring its commitment to maintain the highest standards of occupational health and safety throughout its operations.



**b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**

The processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity are:

- Hazard Identification and Risk Assessment (HIRA):** This process involves a thorough evaluation of the work environment and operational tasks to identify potential hazards that could harm employees, visitors, or the surrounding ecosystem. The risk associated with each identified hazard is carefully assessed to determine the likelihood and potential consequences of an incident. Based on this analysis, appropriate actions are developed and implemented to mitigate the risks.
- Health and Safety Inspections:** This method entails reviewing the organization’s policies, procedures, and practices related to environmental management, health, and safety. HSE inspections and audits identify areas for improvement to reduce incident risks and ensure compliance with regulatory obligations and industry standards. Corrective action plans are developed based on audit findings.

In its hazard assessments, the Entity reviews all routine and non-routine activities to identify significant risks and establish control measures. For routine tasks, the Entity utilizes a Safety Audit checklist encompassing 188 points covering various operational areas. For non-routine tasks, such as working at heights and excavation, the Entity uses a work permit system and other hazard identification techniques to ensure safety.

**c. Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)**

Yes, the Entity has procedures in place that allow workers to report work-related hazards and safely remove themselves from any associated risks.

**d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)**

Yes, the employees/workers of the Entity have access to non-occupational medical and healthcare services.

**11 Details of safety related incidents, in the following format:**

Safety Incident/Number	Category*	FY 2023-24 (Current financial year)	FY 2022-23 (Previous financial year)
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	Nil	Nil
	Workers	Nil	1.17
Total recordable work-related injuries	Employees	Nil	Nil
	Workers	Nil	3
No. of fatalities	Employees	Nil	Nil
	Workers	Nil	Nil
High consequence work-related injury or ill-health (excluding fatalities)	Employees	Nil	Nil
	Workers	Nil	Nil

\*Including in the contract workforce

**12 Describe the measures taken by the entity to ensure a safe and healthy work place.**

The Entity prioritizes the health and safety of its employees, recognizing them as its greatest asset. To maintain a safe and healthy workplace, the Entity has implemented several key measures. Notably, 30% of its plants are certified under the ISO 45001 Occupational Health and Safety Management System standards. Below is a comprehensive overview of the Entity’s safety initiatives:

**Safety Management Systems:**

- ISO 45001:2018 Implementation: The Entity adheres to the latest ISO 45001 standard for Occupational Health and Safety Management Systems, demonstrating its commitment to continual improvement.
- 14 Safety Policies: The Entity has established 14 comprehensive safety policies designed to address various workplace hazards and ensure adherence to best practices.

### Risk Prevention and Mitigation:

- Daily Safety Patrols: The Plant Head, Maintenance Head, and Safety Officers conduct daily inspections to promptly identify and address unsafe acts or conditions.
- Regular Safety Audits: Plant Safety Officers conduct regular audits, while internal safety reviews involve all Safety Committee members for a thorough evaluation.
- Corporate Safety Audits: Every two months, a comprehensive checklist-based corporate safety audit is conducted to review all processes across the Entity.

### Employee Preparedness and Training:

- New Joinee Safety Induction Program: New employees undergo a dedicated safety induction program to equip them with essential knowledge and safe work practices.
- Extensive Safety Training Programs: The Entity offer a wide range of safety training programs to ensure all employees are well-informed and prepared to handle various workplace scenarios.

### Safety Culture and Communication:

- Effectively Drive the PTW System: The Entity effectively manage the Permit-To-Work (PTW) system to control hazardous activities and prevent accidents.
- Shop Floor Visualization: The Entity uses visual aids and signage to promote safety awareness on the shop floor, keeping safety top-of-mind for all employees.
- Safety & Health Awareness Programs: The Entity actively create and deliver safety and health awareness programs to keep employees informed and engaged.
- Employee Engagement Programs: The Entity organizes events such as Safety Week, Earth Day, and World Environment Day with the aim to foster a culture of safety and environmental responsibility.

By implementing these comprehensive safety measures, the Entity strive to create a safe and healthy work environment for all employees.

### 13 Number of Complaints on the following made by employees and workers:

	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working conditions	Nil	Nil	-	Nil	Nil	-
Health & safety	Nil	Nil	-	Nil	Nil	-

### 14 Assessments for the year:

#### % of your plants and offices that were assessed (by entity or statutory authorities or third parties)

Health and safety practices	→	33.33%	of the plants and offices were assessed by the Entity internally
Working conditions	→	40.00%	of the plants and offices were assessed by the Entity internally

**15 Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.**

**Ergonomic improvements:**

The Entity's team recognized that workers were experiencing difficulties when handling heavy columns on the cockpit line. In response, they modified the trunnion hand bracket, making it easier to access and reducing strain on workers' hands. This proactive measure exemplifies the Entity's commitment to identifying and addressing ergonomic concerns to ensure the safety and comfort of its employees.

**Water conservation:**

To manage water consumption more efficiently, the Entity has installed water meters across various locations in Nashik. This initiative will allow us to monitor water usage closely and pinpoint areas where conservation efforts can be improved.

**Clearer eye bolt identification:**

Eye bolts are now clearly marked with identification numbers, making them easier to locate and reducing the risk of confusion.

**Enhanced PTW system:**

The Permit-To-Work (PTW) system books have been updated to provide better clarity and ensure improved adherence to safety protocols.

**Safer walkways:**

Anti-skid tape has been applied to stairs to prevent slips and falls.

**Improved visual communication:**

Visual aids and signage have been upgraded throughout the facility to enhance safety awareness.

**Leadership Indicators**

**1 Does the entity extend any life insurance or any compensatory package in the event of death of**

(A) Employees (Y/N)

Yes

The Entity extends life insurance and other compensatory packages in the event of the deaths of employees and workers.

(B) Workers (Y/N)

Yes

**2 Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.**

The Entity ensure compliance with statutory requirements by deducting TDS for service providers, ensuring all regulatory obligations are met in a positive and proactive manner.

**3 Provide the number of employees/workers having suffered high consequence work- related injury/ill-health/fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

	Total no. of affected employees/workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Employees	Nil	Nil	Nil	Nil
Workers	Nil	Nil	Nil	Nil

**4 Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)**

Yes, the Entity hires or retains retired employees for specific vacancies within the organization. Typically, these employees are offered a one-year agreement, which may be renewed based on their performance and the availability of further vacancies.

However, transition assistance programs have not yet been established for the newly acquired Entity (IAC).

**5 Details on assessment of value chain partners:**

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	The Entity is currently formulating the procedures to assess its value chain partners' health and safety practices, as well as their working conditions.
Working conditions	

**6 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.**

Corrective actions will be implemented based on the outcome of the assessments. The Entity is committed to addressing the issues (if any) promptly to ensure the highest standards of safety and compliance.










**Essential Indicators**
**1 Describe the processes for identifying key stakeholder groups of the entity.**

The Entity prioritizes a strong and transparent relationship with investors by maintaining a deep understanding and consistent alignment with their expectations. A commitment to client value is a core aspect of the corporate philosophy, reflecting a dedication to client satisfaction. Employees are recognized as essential contributors to creating value for both clients and the organization, and the Entity is committed to providing them with rewarding career opportunities. Suppliers are considered key stakeholders who play a vital role in enabling the delivery of business value. The Entity's business practices focus on inclusive growth, ensuring that the community remains central to sustainable initiatives.




The stakeholder groups of the entity are identified through discussions in Internal Management Meetings, as per the process flow mentioned below:

- Conducting detailed discussions with the Entity's Legal and Secretarial Department and management to identify key stakeholder groups.
- Identifying stakeholders based on their material influence on the Entity or how they are materially affected by the Entity's corporate decisions and their outcomes.
- Stakeholders include customers, suppliers, employees/workers, partners, the Board of Directors, promoters, regulatory authorities/government entities, institutions/industry bodies (such as Banks, NBFCs, ACMA, SIAM), CSR entities, and investors, among others.

**2 List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.**

Stakeholder group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of Communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website), other	Frequency of engagement (Annually/ half yearly/ quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers 	No	E-mails, meetings and website	Need-based	Product-related, price negotiations, and technological advancement, among others
Suppliers 	No	E-mails, meetings and website	Need-based	Price negotiations, and technological advancement, among others
Employees/workers 	No	E-mails, meetings and website	Need-based	Entity policies, organizational structure, and important developments
Partners 	No	E-mails and meetings	Quarterly and need-based	Business-related dealings and technological advancement among others
Board of Directors 	No	E-mails and meetings	Quarterly and need-based	Financial results, internal controls, limited review and audit reports, among others
Promoters 	No	E-mails and meetings	Need-based	Issues requiring decisions, budget, future planning, customer complaints, quality issues, safety-related concerns, among others
Regulatory Authorities/Government 	No	Emails, statutory reports, Government portals	As per statutory requirements	Compliance and policy-related matters



Stakeholder group	Whether identified as vulnerable & marginalized group (Yes/No)	Channels of Communication (Email, SMS, newspaper, pamphlets, advertisement, community meetings, notice board, website), other	Frequency of engagement (Annually/ half yearly/ quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Institutions/ industry Bodies (Banks/NBFC/ ACMA/SIAM) 	No	E-mails, meetings, Reports & disclosures	Continuous	Industrial development-related and finance-related issues
Community/ society (CSR/ ESG) 	Yes	E-mails, meetings, social media & website	Continuous	Society, health and education-related matters
Investors 	No	E-mails, meetings, website, newspaper, corporate announcements, social media	Continuous & as per statutory timelines	Financial and operational performance-related issues

### Leadership Indicators

**1 Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

Stakeholder consultations are facilitated by designated personnel, business leaders, and key process heads within the Entity. Feedback and concerns raised by stakeholders are escalated to the Board of Directors through relevant Board Committees, including the Audit Committee, Nomination and Remuneration Committee, CSR Committee, Risk Management Committee, and Share Transfer/Stakeholders Relationship Committee.

The Entity engages in consistent and proactive communication with key stakeholders through conference calls, providing clear explanations of its plans and results. This approach fosters a sense of shared prosperity and advancement for both the Entity and society at large, encouraging ongoing engagement and participation

**2 Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No).**

Yes

**If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

The stakeholder consultations were conducted to aid in identifying and managing environmental and social topics. The process for consulting with the Board on economic, environmental, and social topics includes:

- Compiling a comprehensive list of all potential stakeholders and ESG-related matters relevant to the Entity and the automobile industry, in collaboration with various departments.
- Discussing these topics with different stakeholders and senior management personnel of the Entity to gather feedback.
- Incorporating feedback from such consultations into the Entity's policies and activities.

**3 Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**

To address the concerns of vulnerable and marginalized stakeholder groups, the Entity begins the process by identifying target areas and assessing their needs through surveys, visits, and evaluations to determine whether these needs are project-relevant or aspirational. Following this, a thorough Needs Assessment is conducted to identify specific communities that would benefit most from the Entity's Corporate Social Responsibility (CSR) interventions.

The Entity then collaborates with the local community to finalize projects, ensuring alignment with the identified needs and aspirations. On-ground mobilization strategies are implemented to effectively engage stakeholders and the community in CSR initiatives, ensuring that the projects not only address their concerns but also empower them through active participation. This holistic approach ensures that the Entity's actions are inclusive and have a meaningful impact on the most vulnerable groups within the community.

**Essential Indicators**
**1 Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:**

Category	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)*		
	Total (A)	No. of employees / Workers covered (B)	% (B/A)	Total (C)	No. of employees / Workers covered (D)	% (D/C)
<b>Employees</b>						
Permanent	1,472	714	48.51%	865	164	18.96%
Other than permanent	1	-	-	-	-	-
<b>Total employees</b>	<b>1,473</b>	<b>714</b>	<b>48.47%</b>	<b>865</b>	<b>164</b>	<b>18.96%</b>
<b>Workers</b>						
Permanent	754	491	65.12%	551	373	67.70%
Other than permanent	6,878	414	6.02%	2,537	166	6.54%
<b>Total workers</b>	<b>7,632</b>	<b>905</b>	<b>11.85%</b>	<b>3,088</b>	<b>539</b>	<b>17.45%</b>

Note : These trainings covered only training on POSH as one of the fundamental human rights provided to employees and workers.

\*FY 2022-23 Permanent & Other than permanent worker data has been corrected.

**2 Details of minimum wages paid to employees and workers, in the following format:**

Category	FY 2023-24 (Current Financial Year)					FY 2022-23 (Previous Financial Year)				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B /A)	No. (C)	% (C /A)		No. (E)	% (E /D)	No. (F)	% (F /D)
<b>Permanent employees</b>										
Male	1,404	-	-	1,404	100%	827	-	-	827	100%
Female	68	-	-	68	100%	38	-	-	38	100%
<b>Other than permanent employees</b>										
Male	-	-	-	-	-	-	-	-	-	-
Female	1	1	100%	-	-	-	-	-	-	-
<b>Permanent workers</b>										
Male	717	-	-	717	100%	529	-	-	529	100%
Female	37	-	-	37	100%	22	-	-	22	100%
<b>Other than permanent workers</b>										
Male	5,691	5,691	100%	-	-	2,371	2,371	100%	-	-
Female	1,187	1,187	100%	-	-	166	166	100%	-	-

**3 Details of remuneration/salary/wages, in the following format:**
**a. Median remuneration/wages:**

	Male		Female	
	Number	Median remuneration/ Salary/ wages of respective category	Number	Median remuneration/ Salary/ wages of respective category
Board of Directors (BoD)*	2	1,35,14,500	0	0
Key Managerial Personnel*	5	1,26,00,000	0	0
Employees other than BoD and KMP	1,404	7,46,498.26	68	5,84,288.66
Workers	717	3,90,253.66	37	2,56,432.86

Note: \*The above mentioned information is on Standalone basis.

**b. Gross wages paid to females as % of total wages paid by the entity, in the following format:**

	<b>FY 2023-24 (Current Financial Year)</b>	<b>FY 2022-23 (Previous Financial Year)</b>
Gross wages paid to females as % of total wages	4.62%	17.84%



**4 Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)**

Yes, the Entity has a well-defined Human Rights Policy in place, ensuring that employees can bring their complaints or grievances to either the Human Resources department or senior management. The Corporate HR Head oversees the management of human rights impacts or issues involving the Entity's employees and workers. Department heads are also responsible for addressing human rights concerns within their respective areas. Additionally, the senior management actively reviews and updates the Human Rights Policy at the organizational level.

**5 Describe the internal mechanisms in place to redress grievances related to human rights issues.**

The Entity prioritizes upholding and promoting human rights through fair and ethical business practices. It has established robust internal mechanisms, including a POSH Policy, Grievance Redressal Policy, Vigil Mechanism/Whistleblower Policy, and an employee app for grievance registration. Human rights concerns can be submitted to location in-charges or the HR department via in-person visits or email. Upon receipt, each grievance is acknowledged with a unique ID for tracking. This is followed by an initial review, categorization, and assignment to appropriate personnel for thorough investigation and resolution. Throughout the process, complainants receive regular updates on progress. Upon resolution, detailed reports are documented and communicated to the complainants, ensuring transparency and prompt closure. Although no human rights grievances have been received to date, the Entity remains committed to addressing any future concerns effectively.

**6 Number of Complaints on the following made by employees and workers:**

	FY 2023-24 (Current Financial Year)			FY 2022-23 (Previous Financial Year)		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual harassment	Nil	Nil	-	Nil	Nil	
Discrimination at workplace	Nil	Nil	-	Nil	Nil	-
Child labour	Nil	Nil	-	Nil	Nil	-
Forced labour/ Involuntary labour	Nil	Nil	-	Nil	Nil	-
Wages	Nil	Nil	-	Nil	Nil	-
Other human rights related issues	Nil	Nil	-	Nil	Nil	-

**7 Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:**

	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
Complaints on POSH as a % of female employees/workers	Not Applicable	Not Applicable
Complaints on POSH upheld	Not Applicable	Not Applicable

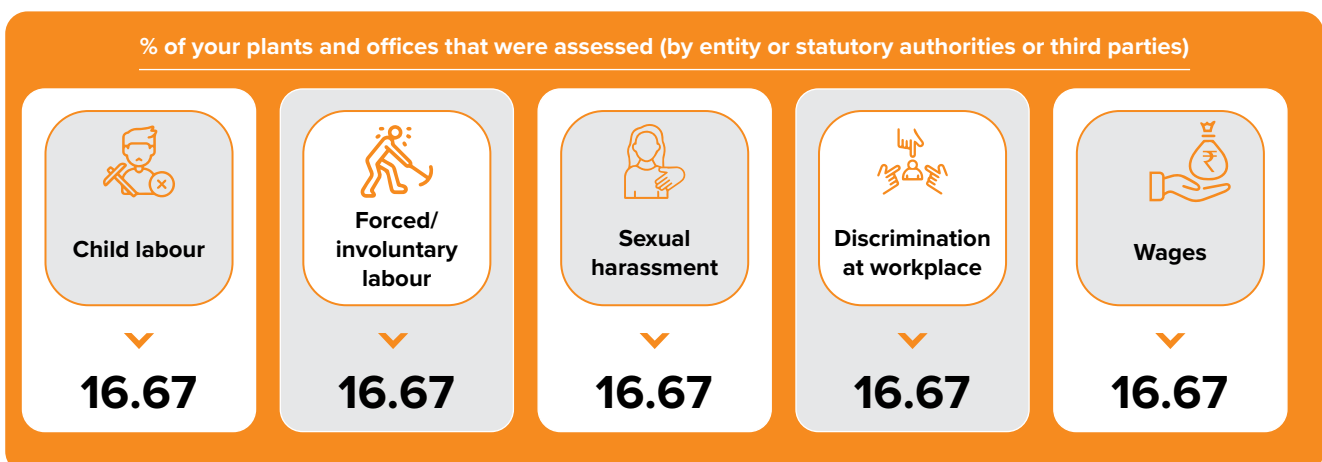
**8 Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.**

The Entity's core values strictly prohibit any form of retaliation. Employees who report suspected legal or policy violations are protected from adverse consequences. Retaliation against those who report in good faith or assist in investigations is strictly forbidden. The Entity upholds principles of confidentiality, sensitivity, non-retaliation, and impartiality in its Grievance Redressal, Whistleblower, and POSH Policies. All reports and related information are kept confidential and accessible only to authorized personnel. The Entity ensures that concerns are addressed sensitively and promptly, conducting thorough and impartial investigations to allow all parties to present relevant facts and evidence.

**9 Do human rights requirements form part of your business agreements and contracts? (Yes/No)**

The Entity strives to integrate fundamental human rights into all its business agreements and contracts, both in principle and in practice. Many of these agreements formally include provisions safeguarding these rights. Additionally, the Entity regularly reviews and revises these agreements as part of a formal process to ensure ongoing compliance and strengthen its commitment to human rights integration.

**10 Assessments for the year:**



Note: Assessments were conducted Internally by the Entity

**11 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.**

In accordance with the Entity’s corporate practices, any significant risks or concerns identified during assessments are promptly addressed by the relevant Committees, which include both internal and external stakeholders. During FY 2023-24, the assessments referenced in Question 10 did not highlight any significant risks or concerns. Nevertheless, the Entity remains fully committed to implementing corrective measures should any issues arise in the future.

**Leadership Indicators**

**1 Details of a business process being modified / introduced as a result of addressing human rights grievances/ complaints.**

During the year, there were no notable grievances concerning human rights. As part of its standard procedures, the Entity consistently reinforces human rights principles throughout its business operations via the Code of Conduct and other policies. Regular training sessions are provided to employees and workers, and policies like the Code of Conduct are periodically updated based on emerging risks and feedback received.

**2 Details of the scope and coverage of any Human rights due-diligence conducted.**

The Entity consistently initiates efforts to integrate human rights into its business culture across all levels throughout the year.

**3 Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016**

The premises and offices of the Entity are accessible to differently abled visitors, with the exception of a few locations and manufacturing facilities due to safety considerations and the specific design and structure of those areas.

**4 Details on assessment of value chain partners:**

	<b>% of value chain partners (by value of business done with such partners) that were assessed</b>
Child labour	The Entity is currently formulating the procedures to assess its value chain partners on Human Rights Parameters.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

**5 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.**

Corrective actions will be implemented based on the outcome of the assessments. The Entity is committed to addressing the issues (if any) promptly to ensure the highest standards of safety and compliance.



**Essential Indicators**
**1 Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

Parameter	FY 2023-24** (Current Financial Year)	FY 2022-23* (Previous Financial Year)
<b>From renewable sources</b>		
Total electricity consumption (A) (MJ)	3,38,45,680.80	2,89,50,106.25
Total fuel consumption (B) (MJ)	0	0
Energy consumption through other sources (C) (MJ)	0	0
<b>Total energy consumption from renewable sources (A+B+C) (MJ)</b>	<b>3,38,45,680.80</b>	<b>2,89,50,106.25</b>
<b>From non-renewable sources</b>		
Total electricity consumption (D) (MJ)	7,43,80,977.00	6,63,51,066.84
Total fuel consumption (E) (MJ)	1,34,88,900.47	75,02,852.42
Energy consumption through other sources (F) (MJ)	0	0
<b>Total energy consumption from Non-Renewable sources (D+E+F) (MJ)</b>	<b>8,78,69,877.47</b>	<b>7,38,53,919.26</b>
<b>Total energy consumed (A+B+C+D+E+F) (MJ)</b>	<b>12,17,15,558.27</b>	<b>10,28,04,025.51</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumption (MJ)/turnover in ₹ Lakh)	628.65	556.46
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed (MJ)/revenue from operations adjusted for PPP in ₹ Lakh)	628.65	556.46
<b>Energy intensity in terms of physical output (MJ/Nos)</b>	0.92	0.89
Energy intensity (optional) – the relevant metric may be selected by the entity		

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency No

Note: \*FY2022-23 data has been corrected due to change in calculation methodology.

\*\*Data from 5 IAC plants are not included in calculation.

**2 Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

No, the Entity doesn't have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India.

**3 Provide details of the following disclosures related to water, in the following format:**

Parameter	FY 2023-24** (Current Financial Year)	FY 2022-23* (Previous Financial Year)
<b>Water withdrawal by source (in kilo litres)</b>		
(i) Surface water	-	34,092
(ii) Groundwater	50,992.88	10,645.84
(iii) Third party water	1,23,319.03	79,048.18
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>1,74,311.91</b>	<b>1,23,786.02</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>1,69,289.91</b>	<b>1,01,908.70</b>
<b>Water intensity per rupee of turnover</b> (Water consumed/turnover in ₹ Lakh)	0.87	0.55

Parameter	FY 2023-24** (Current Financial Year)	FY 2022-23* (Previous Financial Year)
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption/Revenue from operations adjusted for PPP)	0.87	0.55
<b>Water intensity in terms of physical output (kL/Nos)</b>	0.0013	0.0009
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity		

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

Note: \*FY2022-23 data has been corrected due to change in calculation methodology

\*\*Data from 5 IAC plants are not included in calculation.

#### 4 Provide the following details related to water discharged:

Parameter	FY 2023-24** (Current Financial Year)	FY 2022-23* (Previous Financial Year)
<b>Water discharged by destination and level of treatment (in kilo litres)</b>		
(i) To Surface water	-	1,647.59
a. No treatment	-	830
b. With treatment – please specify level of treatment	-	817.59
(ii) To Groundwater	-	13,365.73
a. No treatment	-	7,260.73
b. With treatment – please specify level of treatment	-	6,105
(iii) To Seawater	-	-
a. No treatment	-	-
b. With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties	5,022	6,864
a. No treatment	4,974	2,817
b. With treatment – please specify level of treatment	48	4,047
(v) Others	-	-
a. No treatment	-	-
b. With treatment – please specify level of treatment	-	-
<b>Total volume of water discharged (in kilolitres) (i + ii + iii + iv + v)</b>	<b>5,022</b>	<b>21,877.32</b>

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

Note: \*FY2022-23 data has been corrected due to change in calculation methodology.

\*\*Data from 5 IAC plants are not included in calculation.

#### 5 Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

The Entity has established Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STPs) across all its Plants except one Plant where STP is not installed. The treated water from these facilities is repurposed for gardening and other non-potable applications. Moreover, the Entity actively promotes water conservation through rainwater harvesting in the majority of its plant locations.

#### 6 Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Please specify unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
NOx	Metric tonnes	0.360	Value calculated for FY23-24 only
SOx	Metric tonnes	0.363	
Particulate matter (PM)	Metric tonnes	0.583	
Persistent organic pollutants (POP)	-	-	
Volatile organic compounds (VOC)	-	-	
Hazardous air pollutants (HAP)	-	-	
Others – please specify	-	-	

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

**7 Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**

Parameter	Unit	FY 2023-24* (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	843.00	Value calculated for FY23-24 only
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	17,004.32	
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO <sub>2</sub> equivalent/ Lakh ₹	0.09	
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Metric tonnes of CO <sub>2</sub> equivalent/ Lakh ₹	0.09	
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	Metric tonnes of CO <sub>2</sub> equivalent/ physical output	0.0001	
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity			

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

\*Data from 5 IAC plants are not included in calculation.

**8 Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.**

The Entity has implemented a range of energy-saving projects aimed at enhancing efficiency and reducing greenhouse gas emissions across its operations. These projects include:

- Solar smart streetlights
- Installation of Retrofit Emission Control device for the DG set
- Installation of energy-saving Insulation Jackets for Band Heaters - IMM Machines
- Provision of VFD for Hot plate
- Installation of motion sensors for conference hall AC units/lights for optimization of idle running
- Provision of Passive infrared sensor (PIR) for All Shopfloor toilets
- Installation of additional rooftop solar panel in the Expansion Area
- Replacement of ultrasonic welding process with heat stacking SPM for spoiler
- Vehicle trips alterations for dispatch of FG/WIP Goods
- Group captative solar power
- Pressure switch with energy efficient pump system installation for water distribution pumps
- HVLS fan installation in shopfloor



**9 Provide details related to waste management by the entity, in the following format:**

Parameter	FY 2023-24* (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste <b>(A)</b>	723.70	699.54
E-waste <b>(B)</b>	980.52	-
Bio-medical waste <b>(C)</b>	0.0038	0.0002
Construction and demolition waste <b>(D)</b>	-	-
Battery waste <b>(E)</b>	-	-
Radioactive waste <b>(F)</b>	-	-
Other hazardous waste. Please specify, if any. <b>(G)</b>	124.02	49.44
Other Non-hazardous waste generated <b>(H)</b> . Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	716.66	734.88
<b>Total (A+B + C + D + E + F + G+ H)</b>	<b>2,544.90</b>	<b>1,483.86</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated/Revenue from operations in ₹ lakhs)	0.013	0.0080
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP)	0.013	0.0080
<b>Waste intensity in terms of physical output (MT/ Nos)</b>	0.00002	0.00001
<b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity		
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	1,928.05	243.77
(ii) Re-used	378.61	458.16
(iii) Other recovery operations	24.01	-
<b>Total</b>	<b>2,330.66</b>	<b>701.93</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	0.06	0.0002
(ii) Landfilling	-	14.82
(iii) Other disposal operations	209.81	768.03
<b>Total</b>	<b>209.87</b>	<b>782.85</b>

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

\*Data from 5 IAC plants are not included in calculation.

**10 Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

The Entity recognizes the critical importance of waste management, a key issue affecting the organization, neighboring communities, and the environment. The primary objectives of its waste management strategy are to minimize waste generation, enhance recycling and recovery efforts, and reduce waste disposal. To promote responsible waste management across all facilities, the Entity has implemented practices such as source-separated waste collection, waste reuse and recycling, and the secure disposal of hazardous waste in collaboration with authorized agencies. By adhering to the '3R' strategy of Reduce, Reuse, and Recycle, the Entity remains committed to continuously improving its waste management procedures to align with broader environmental, social, and governance goals.



11 If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any
The Entity does not operate in or around ecologically sensitive areas where environmental approvals or clearances are required.		

12 Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
The Entity did not undertake any EIA-required projects in the FY2023-24					

13 Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Specify the law / regulation / guidelines which was not complied with	Provide details of the non-compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
Yes, the Entity is compliant with all applicable environmental laws, regulations, and guidelines in India, including the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, and the Environment Protection Act along with rules thereunder.			

### Leadership Indicators

1 Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

For each facility / plant located in areas of water stress, provide the following information:

- Name of the area : Gurugram, Bhiwadi, Bengaluru, Kuruli, Manesar
- Nature of operations : Corporate office and automotive plastic parts manufacturing
- Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2023-24** (Current Financial Year)	FY 2022-23* (Previous Financial Year)
<b>Water withdrawal by source (in kilo litres)</b>		
(i) Surface water	-	-
(ii) Groundwater	2,330.70	-
(iii) Third party water	37,893.29	20,846.00
(iv) Seawater / desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	<b>40,223.99</b>	<b>20,846.00</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>39,944.99</b>	<b>18,029.00</b>
<b>Water intensity per rupee of turnover</b> (Water consumed / turnover)	0.21	0.10

Parameter	FY 2023-24** (Current Financial Year)	FY 2022-23* (Previous Financial Year)
<b>Water intensity in terms of Physical output (kL/Nos) – the relevant metric may be selected by the entity</b>	0.0003	0.00016
<b>Water discharged by destination and level of treatment (in kilo litres)</b>		
(i) Into Surface water	-	-
c. No treatment	-	-
d. With treatment – please specify level of treatment	-	-
(ii) Into Groundwater	-	-
c. No treatment	-	-
d. With treatment – please specify level of treatment	-	-
(iii) Into Seawater	-	-
c. No treatment	-	-
d. With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties	279.00	2,817.00
c. No treatment	231.00	2,817.00
d. With treatment – Primary & Tertiary	48.00	-
(v) Others	-	-
c. No treatment	-	-
d. With treatment – please specify level of treatment	-	-
<b>Total volume of water discharged (in kilolitres) (i + ii + iii + iv + v)</b>	<b>279.00</b>	<b>2,817.00</b>

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

Note: \*FY2022-23 data has been corrected due to change in calculation methodology.

\*\*Data from 5 IAC plants are not included in calculation.

**2 Please provide details of total Scope 3 emissions & its intensity, in the following format:**

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO <sub>2</sub> equivalent	Scope-3 emissions are not considered by the Entity presently. The Entity is in the process of laying down the roadmap in the near future.	
<b>Total Scope 3 emissions per rupee of turnover</b>			
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity			

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. Not Applicable

**3 With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**

The Entity does not function in ecologically sensitive areas. As a result, there are no significant direct or indirect impacts on biodiversity to report.

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**4 If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:**

Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of Initiative
<p><b>1</b> Energy Saving Initiatives</p>	<ul style="list-style-type: none"> <li>Solar smart street lights</li> <li>Installation of Retrofit Emission Control device to the DG set</li> <li>Installation of energy-saving Insulation Jackets for Band Heaters - IMM Machines</li> <li>VFD Provision for Hot Plates</li> <li>Installation of motion sensors for conference hall AC units/ lights for optimization of idle running</li> <li>Passive infrared sensor (PIR) provision for all shopfloor toilets</li> <li>Rooftop solar panel addition in expansion area</li> </ul>	<p>Reduction of greenhouse gas emissions and reduction of energy consumption</p>
<p><b>2</b> Water Saving Initiatives</p>	<ul style="list-style-type: none"> <li>ETP &amp; STP capacity enhanced over the no. of plants to optimize the water usage</li> <li>Rainwater harvesting</li> <li>Use of water jet for solar modules cleaning</li> <li>The wastewater from water cooler is used in gardening</li> <li>STP water being used in gardening</li> </ul>	<p>Recycle, reuse of wastewater for operational and gardening purpose</p>
<p><b>3</b> Waste Reduction &amp; Management</p>	<ul style="list-style-type: none"> <li>Composting</li> <li>3R initiatives</li> <li>Investing on efficient waste collection and disposal system</li> </ul>	<p>Waste segregation, waste to landfill reduction and circularity through composting</p>

**5 Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.**

As part of its business continuity and disaster management plan, the Entity has established an Emergency Response Plan. This plan is designed to address various emergency situations and provides detailed procedures for managing each scenario. The plan is applicable across all plants and is shared with all employees through the Employee App. The Emergency Response Plan includes procedures for:

- Fire & Explosion Emergency
- Accidents
- Earthquake Emergency
- Flood Emergency
- Sewage Outflow Emergency
- Spillage and Leakages of Hazardous Substances
- Failure of Pollution Control Equipment and Compressed Air Lines

- Medical Emergency - Death Emergency
- Civil Unrest Emergency
- Food Poisoning Emergency
- Snake Bite Emergency
- Gas Leakage Emergency

**6 Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.**

The Entity found no significant environmental impact from its suppliers. The Entity is committed to environmental stewardship throughout the value chain, requiring all suppliers to uphold high environmental standards and encouraging them to promote these principles within their own supply chains.

**7 Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**

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**PRINCIPLE**

**7**

Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

**Essential Indicators**

- 1 a. Number of affiliations with trade and industry chambers/ associations.**  
The Entity is affiliated with 2 trade and industry chambers/associations.
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to**

	<b>Name of the trade and industry chambers/ associations</b>		<b>Reach of trade and industry chambers/ associations (State/National)</b>
1	Automotive Component Manufacturers Association of India, New Delhi	→	National
2	Confederation of Indian Industry (CII)	→	National

- 2 Provide details of corrective action taken or underway on any issues related to anti- competitive conduct by the entity, based on adverse orders from regulatory authorities.**

<b>Name of authority</b>	<b>Brief of the case</b>	<b>Corrective action taken</b>
During the reporting period, the Entity did not receive any notices from regulatory authorities related to anti-competitive, antitrust, conflict of interest, and as a result, corrective actions were not required.		

**Leadership Indicators**

- 1 Details of public policy positions advocated by the entity:**

<b>S. No.</b>	<b>Public policy advocated</b>	<b>Method resorted for such advocacy</b>	<b>Whether information available in public domain? (Yes/No)</b>	<b>Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)</b>	<b>Web Link, if available</b>
The Entity directly or through industry bodies and other associations puts forth a number of suggestions with respect to the industry in general and its activities in particular.					



**PRINCIPLE**

**8**

Businesses should promote inclusive growth and equitable development

**Essential Indicators**

**1 Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

Name and brief details of project	SIA notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant web link
<b>Sunehra Kal - Life Skill Education:</b> The project focuses on developing essential life skills in students from grade 9 to 12, aiming to enhance their behavior, attitude, and decision-making abilities. It employs various strategies such as role play, interactive questioning, festival, awards, discussion - based classes, and activity-based learning to engage students effectively.	-	-	Yes	No	
<b>Cancer Awareness and Detection Camps:</b> The project aims to raise cancer awareness, provide screening services, and offer financial support to economically weaker individuals diagnosed with cancer in the slums of Delhi NCR, ultimately reducing the burden of cancer in the region.	-	-	Yes	No	

Note: In FY 2023-24, the Social Impact Assessment for the aforementioned projects was voluntarily undertaken by the Entity.

**2 Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:**

S. no.	Name of project for which R&R is ongoing	State	District	No. of project affected families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
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The Entity did not undertake any projects requiring Rehabilitation and Resettlement (R&R) activities during the reporting period.

**3 Describe the mechanisms to receive and redress grievances of the community.**



The Entity engages in various CSR activities to address the needs of the communities surrounding its plant premises. The Entity has implemented an Open Door Policy, allowing community members to approach the plant/location and its management directly. Additionally, the Entity proactively reaches out to communities, including vulnerable groups, to address their grievances whenever necessary.

**4 Percentage of input material (inputs to total inputs by value) sourced from suppliers:**

	FY 2023-24 (Current Financial Year)	FY 2022-23* (Previous Financial Year)
Directly sourced from MSMEs/small producers	35.03%	32.28%
Directly from within India	94.80%	94.50%

Note: \*FY2022-23 data has been corrected due to change in calculation methodology.

**5 Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost**

Location	FY 2023-24* (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Rural	57.91%	55.79%
Semi-urban	1.51%	2.03%
Urban	40.58%	42.18%
Metropolitan	-	-

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

Note: \*Excluding data related to 5 IAC plants.

**Leadership Indicators**

**1 Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):**

Details of negative social impact identified	Corrective action taken
For the projects where Social Impact Assessments were conducted, negative impacts requiring corrective actions were not identified.	

**2 Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:**

S. No.	State	Aspirational district	Amount spent (In INR)
1	Haryana	Nuh, Mewat	14,80,322
2	Uttarakhand	Udham Singh Nagar	7,55,500

**3 (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)**

No, in accordance with the Entity's policy, discrimination is not practiced in supplier selection, ensuring equal opportunities for all potential suppliers. The Entity actively encourages working with local suppliers or those near its facilities; however, it has not specifically included marginalized or vulnerable groups in its supplier qualification criteria.

**(b) From which marginalized /vulnerable groups do you procure?**

-

**(c) What percentage of total procurement (by value) does it constitute?**

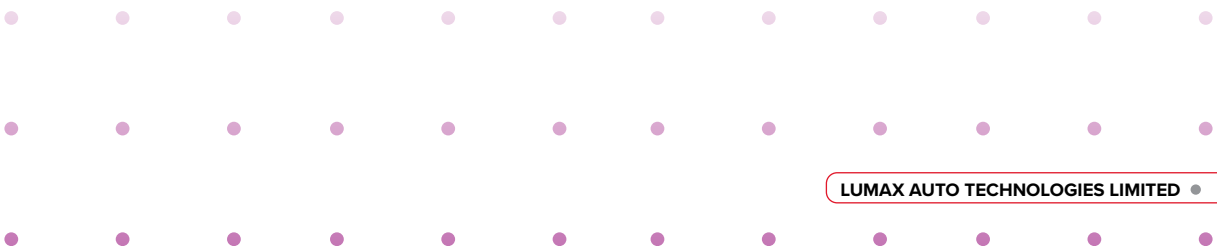
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**4 Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:**

S. No.	Intellectual Property based on traditional knowledge	Owned/Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
The Entity does not own or have acquired any such intellectual properties.				

**5 Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.**

Name of authority	Brief of the case	Corrective action taken
During FY 2023-24 there were no disputes related to intellectual property or traditional knowledge, hence corrective actions were not undertaken.		



## 6 Details of beneficiaries of CSR Projects:

S. No.	CSR project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	'Sunehra Kal' - Life Skill	2,600	90%
2	Career Counselling	2,600	90%
3	'Usha Ki kiran' Scholarship	240 direct & 5,000+ inspired	90%
4	Infrastructure Support	500+	90%
5	Cancer Awareness and Screening Camps	473	90%
6	Eye Screening and Free cataract Surgeries	167	95%
7	Juvenile Diabetes	15	95%
8	Solar Power Plant at Vanvasi Kalyan Ashram	50	100%
9	Development of the School	650	100%
10	Solar Power Plant at Kal. Mahadu Bapu Takalkar Charitable Trust	50	100%
11	Donation of Food Items at Mamta Andh Anath Kalyan Kendra	120	100%
12	Donation of Desktop and Subscription of E-Learning Software	100	100%
13	Construction of Reinforced Concrete Wall in Aghane	750	100%
14	Plantation of Trees	500+	90%



**PRINCIPLE**

**9**

Businesses should engage with and provide value to their consumers in a responsible manner

**Essential Indicators**

**1 Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

The Entity values customer complaints and is committed to addressing them promptly and effectively. It provides various channels for customers to submit complaints or provide feedback, managing consumer complaints across its 30 facilities (26 Plants and 4 Offices) through Customer Portals, email, or both. Each plant follows structured procedures: complaints and feedback are received via Customer Portals or email; a temporary countermeasure is provided to the customer within 24 hours; complaints are resolved through root cause analysis, and quality tools; and a permanent countermeasure is implemented within one week and communicated to the customer.

**2 Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:**

	As a percentage to total turnover
Environmental and social parameters relevant to the product	Not Applicable, as the Entity is in B2B business, and the product do not reach end customers directly.
Safe and responsible usage	
Recycling and/or safe disposal	

**3 Number of consumer complaints in respect of the following:**

	FY 2023-24 (Current Financial Year)		Remarks	FY 2022-23 (Previous Financial Year)		Remarks
	Received during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil	Nil	-			-
Advertising	Nil	Nil		Nil	Nil	-
Cyber-security	Nil	Nil	-	Nil	Nil	-
Delivery of essential services	Nil	Nil	-	Nil	Nil	-
Restrictive trade practices	Nil	Nil	-	Nil	Nil	-
Unfair trade practices	Nil	Nil	-	Nil	Nil	-
Others (OEMs)	190	Nil	-	75	Nil	-

**4 Details of instances of product recalls on account of safety issues:**

	Number	Reasons for recall
Voluntary recalls	Nil	-
Forced recalls	Nil	-



**5 Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/ No) If available, provide a web-link of the policy.**

Yes, the Entity has a data privacy policy that is available internally within the organization.

**6 Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

The Entity has not encountered any complaints, issues, or penalties related to advertising, delivery of essential services, cybersecurity, data privacy, product recalls, or product/service safety. Consequently, no corrective actions have been necessary.

**7 Provide the following information relating to data breaches:**

**a. Number of instances of data breaches**

Nil

**b. Percentage of data breaches involving personally identifiable information of customers**

Not applicable as no such instances of data breaches have been identified so far.

**c. Impact, if any, of the data breaches**

Not applicable as no such instances of data breaches have been identified so far.

**Leadership Indicators**

**1 Channels/platforms where information on products and services of the entity can be accessed (provide web link, if available).**

The information on products and services of the entity is made available online on the organization website and social media, can be accessed through the links below:

**Website**

- <https://www.lumaxworld.in/lumaxautotech/index.html>

**Social Media**

- <https://www.youtube.com/c/LumaxWorld>
- <https://www.facebook.com/lumaxworld.in>
- <https://www.linkedin.com/company/lumax-world/>

**2 Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.**

As a supplier for OEMs, the Entity's primary responsibility is to adhere to the specifications provided by its OEM partners in manufacturing its products. Consequently, the Entity has a limited role in informing and educating consumers about the safe and responsible usage of the products. The Entity prioritizes adherence to OEM standards to ensure product safety and effectiveness.

**3 Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**

The Entity does not directly provide essential services. However, it is committed to minimizing disruptions in its customers' operations and services. Through consistent and proactive client communication with its clients, the Entity ensures the smooth running of their operations.

**4 Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable)**

**If yes, provide details in brief.**

Yes, as the Entity supplies to OEMs & display the product information as per customers' requirement wherever it is applicable.

**Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Recognizing the importance of customer satisfaction, the Entity actively seeks feedback through various channels. This feedback, whether direct or indirect, helps identify any grievances, and appropriate corrective measures are designed and implemented accordingly. Additionally, the management team regularly reviews and monitors summaries of customer satisfaction trends to ensure continuous improvement.

