

LUMAX AUTO TECHNOLOGIES LIMITED

POLICY ON DIVERSITY

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1. INTRODUCTION

The Board of Directors (“Board”) of Lumax Auto Technologies Limited (“Company”) has formulated a Policy on Diversity (“Policy”) which is applicable to all the personnel of the Company. The Policy sets out the approach to have a diversity at the workplace in terms of thought, experience, knowledge, perspective and gender which shall be in alignment with the applicable laws, rules and regulations applicable to the Company.

2. REGULATORY FRAMEWORK AND APPLICABILITY

Regulation 19(4) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) read with Part D of Schedule II mandates responsibility on Nomination and Remuneration Committee (“Committee”) of every listed company to devise a “Policy on Diversity” on Board and ensuring a transparent nomination process to the Board with the diversity of thought, experience, knowledge, perspective and gender in the Board. In addition, the Policy shall also be applicable to all the Senior Management positions and all permanent and prospective employees (“employees”) of the Company so as to ensure that none of the personnel is unlawfully discriminated against, directly or indirectly, as a result of their colour, creed, race, nationality, ethnic or national origin, connections with a national minority, marital or civil partnership status, pregnancy, age, disability, religion, or similar philosophical belief, sexual orientation, gender or gender reassignment or trade union membership etc. and is not exposed to any harassment in any form.

3. OBJECTIVE

Embracing the requirement of statute in true letter and spirit, this Policy summarizes the employment rules and procedures applicable to all personnel at the Company. The Company aims to promote and supports a diverse workforce at all levels of the Company. We believe that Diversity and Inclusivity at workplace is an instrument for growth and we value and celebrate the uniqueness of every individual by fostering an environment of inclusion and empowerment. The basic objective of this Policy is to provide a diverse workforce and inclusive workplace at all levels of the Company which in turn leads to achievement of following objectives:

- a) Availability of appropriate expertise and diversity based on future projected activities of the Company

- b) Managing the process of recruiting new member to the Board and employees, defining requisite skills and expertise and make recommendations to the Board.
- c) Ensuring that selection process is formal and thorough and non-discriminatory.
- d) Creating a safe and secure work environment that is free from any discrimination which includes but is not limited to our policy of zero tolerance to sexual harassment.
- e) Having a robust framework to attract, engage and retain talent of all ages, genders, nationalities and abilities.

4. POLICY STATEMENT AND PURPOSE

The Company considers its personnel as a pivotal part of the Company and is committed to treat all associates with dignity and respect.

The Company is dedicated to create a working environment with highest degree of ethical and virtuous work practices. Company holds in high regard the guidelines laid down under the international conventions and laws relating to slavery and aims at maintaining a safe and harmonious working environment for each individual, irrespective of the work, designation, ethnicity, race, caste, gender, religion and other such parameters.

The Company believes that a diverse Board will include and make good use of the differences in the skills, knowledge, industry experience, background, race, gender and other qualities of the individual members as a whole. All Board appointments will be done on merit, in the context of skills as required for the areas of our business operations, management and also expertise in the fields of regulatory, legal, research / clinical development, human capital management, strategic planning, marketing and general administration.

Accordingly, the Company has adopted this Policy which provides the framework of its philosophy in achieving diversity of Board, Senior Management positions and at all other levels of workplace in the Company to enable the Company in leveraging the differences in thoughts, perspectives, knowledge, skills, regional and industry experience, cultural and geographical background, age, ethnicity, race and gender which will ensure that Company retains its competitive advantage.

5. DIVERSITY OF BOARD

The Committee shall in order to ensure Diversity of Board be responsible for:

- ❖ Assessing the appropriate mix of diversity, skills, qualification, professional experience, etc. and access the extent to which the required skills are represented on the board.
- ❖ Making recommendation to the Board in relation to the appointments and maintain an appropriate mix of diversity, skills, experience and expertise on the board.

- ❖ Taking into consideration any other parameter which it considers appropriate to achieve objective enshrined in this Policy.

6. DIVERSITY OF EMPLOYEES

The Human Resources Department (HRD) shall in order to ensure Diversity of employees be responsible for:

- ❖ Managing the process of recruiting new employee in the Company, defining requisite skills and expertise
- ❖ Identify appropriate qualified personnel to occupy existing or potential positions at the Company.
- ❖ Having a robust framework to attract, engage and retain talent of all ages, genders, nationalities and abilities
- ❖ Ensuring that appointments are based on merit that complements and expands the skills, experience, expertise of the Company as a whole, taking into account knowledge, professional experience, qualifications, gender, age, cultural, educational background, statutory / regulatory requirement and any other factors that might be relevant and applicable from time to time for it to function effectively

7. MONITORING, TRACKING AND REVIEWING

The Committee shall be responsible for monitoring, tracking and reviewing the policy from time to time and make recommendations on any requisite change to Board for consideration and approval. The periodic maintenance and updating of this Policy shall be undertaken by Human Resources Department (HRD) as may considered appropriate from time to time which shall always be in line with statutory provisions for time being in force. The Committee may at its discretion review and suggest training for directors as a part of complying with this Policy.

8. FAILURE TO COMPLY

The Company is committed to eliminate all forms of unlawful discrimination, harassment, bullying and victimization of persons at workplace. Thus, any failure to comply with the provisions of this policy will be considered as violation of policy and will be subject to disciplinary action which may even extend to termination of services or contract. All the acts of discrimination or treating a person unfavorably on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation shall be taken seriously by the Company.

9. AMENDMENTS AND UPDATES

The Committee shall review this Policy on a periodic basis and recommend revisions, if any, to the Board for consideration and approval.

10. INTERPRETATION

Any words used in this policy but not defined herein shall have the same meaning ascribed to it in the Companies Act, 2013 or Rules made thereunder.

In case of any dispute or difference upon the meaning/interpretation of any word or provision in this Policy, the same shall be referred to the Committee and the decision of the Committee in such a case shall be final.
