

Annexure – G

BUSINESS RESPONSIBILITY REPORT

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1.	Corporate Identity Number (CIN) of the Company	L31909DL1981PLC349793		
2.	Name of the Company	LUMAX AUTO TECHNOLOGIES LIMITED		
3.	Registered Address	2 nd Floor, Harbans Bhawan-II, Commercial Complex, Nangal Raya, New Delhi- 110046		
4.	Website	www.lumaxworld.in/lumaxautotech		
5.	E-mail id	shares@lumaxmail.com		
6.	Financial Year reported	2020-21		
7.	Sector(s) that the Company is engaged in: (industrial activity code-wise)			
	Sr. No.	Name and Description of Main Products & Services	NIC Code of the Product/Service	% to Total Turnover of the Company
	1.	Automotive Lamps	2740	14.98
	2.	Plastic Moulded Parts	22207	34.76
	3.	Frame Chassis	29103	19.89
8.	List three key products/services that the Company manufactures/provides (as in balance sheet)	Automotive Lamps, Moulded Parts and Frame Chassis		
9.	Total number of locations where business activity is undertaken by the Company:			
	(a) Number of International Locations (Provide details of major 5)	NIL		
	(b) Number of National Locations	<p>The Company has 9 manufacturing plants in below locations:</p> <p>1 Chinchwad, Pune, Maharashtra</p> <p>2 Bhosari, Pune, Maharashtra</p> <p>3 Chakan, Pune, Maharashtra</p> <p>4 K- 76, Aurangabad, Maharashtra</p> <p>5 B - 14, Aurangabad, Maharashtra</p> <p>6 Narsapura, Bengaluru, Karnataka</p> <p>7 Manesar, Gurugram, Haryana</p> <p>8 Pantnagar, Udham Singh Nagar, Uttarakhand</p> <p>9 Sahajapur, Aurangabad, Maharashtra</p> <p>In addition to above the Company has the following Marketing/Trading Divisions:</p> <p>1 Gurugram, Haryana</p> <p>2 Jamalpur, Gurugram, Haryana</p>		
10.	Markets served by the Company – Local/State/National/International	National & International		

SECTION B: FINANCIAL DETAILS OF THE COMPANY

(₹ in Lakhs)

S. No.	Particulars	FY 2020-21	FY 2019-20
1.	Paid up Capital	1,363.15	1,363.15
2.	Total Turnover		
	a) Revenue from operations	90,294.89	94,236.07
	b) Other income	2,206.43	2,717.95
3.	Total profit after taxes	4,208.73	5,127.38
4.	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax : 2.01%*		

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* Including the unspent amount earmarked and deposited in separate account in terms of applicable laws.

5. List of activities in which expenditure in 4 above has been incurred :-

(a) Education : 73.96 Lakhs

(b) Health : 54.86 Lakhs

[Detailed in the CSR Annual Report (Annexure - H) which forms part of the Annual Report]

SECTION C: OTHER DETAILS

1. Does the Company have any Subsidiary Company/ Companies?

Yes. We have 10 subsidiaries (including 2 step down subsidiaries) and 2 Associates. Details of the same have been provided in another section of the Annual Report.

2. Do the Subsidiary Company/Companies participate in the Business Responsibility Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s).

The Subsidiary Companies are not required to comply with the Business Responsibility initiatives as per the laws applicable to them.

3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the Business Responsibility initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

The Company actively engages with its suppliers through its Business Responsibility initiatives. However, the Company does not track the actual participation.

SECTION D: BUSINESS RESPONSIBILITY (BR) INFORMATION

1. Details of Director/Directors responsible for BR

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

DIN Number : 00004993

Name : Anmol Jain

Designation : Managing Director

(b) Details of the BR head

S. No.	Particulars	Details
1.	DIN Number (if applicable)	08705643
2.	Name	Vikas Marwah
3.	Designation	Chief Executive Officer (CEO)
4.	Telephone Number	0124-4760000
5.	Email ID	vikas.marwah@lumaxmail.com

2. Principle-wise [as per National Voluntary Guidelines (NVGs)] BR Policies

Principle 1 (P1)	Principle 2 (P2)	Principle 3 (P3)
Ethics, transparency and accountability.	Business should provide goods and services that are safe and contribute to sustainability throughout their life cycle.	Business should promote the wellbeing of all employees.
Principle 4 (P4)	Principle 5 (P5)	Principle 6 (P6)
Business should respect the interests of and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.	Business should respect and promote Human Rights.	Business should respect, protect and make Efforts to restore the environment.
Principle 7 (P7)	Principle 8 (P8)	Principle 9 (P9)
Business when engaged in influencing Public and Regulatory Policy, should do so in a responsible manner.	Business should support inclusive growth and equitable development.	Business should engage with and provide value to their customers and consumers in a responsible manner.

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

S. No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
1.	Do you have a policy/ policies for	Y	Y	Y	Y	Y	Y	Y	Y	Y
2.	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3.	Does the policy conform to any national / international standards? If yes, specify? (50 words)*	Y	Y	Y	Y	Y	Y	Y	Y	Y
4.	Has the policy being approved by the Board? Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	Y	Y	Y	Y	Y	Y	Y	Y	Y
5.	Does the Company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?*	Y	Y	Y	Y	Y	Y	Y	Y	Y
6.	Indicate the link for the policy to be viewed online?	https://www.lumaxworld.in/lumaxautotech/policies.html								
7.	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
8.	Does the Company have in-house structure to implement the policy/ policies.	Y	Y	Y	Y	Y	Y	Y	Y	Y
9.	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	Y	Y	Y	Y	Y	Y	Y	Y	Y
10.	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	The BR policies and its implementation are evaluated internally.								

* The Whistle Blower Policy, Code of Conduct, Prevention of Sexual Harassment Policy and Corporate Social Responsibility Policy are framed as per the requirements of the respective legislations of India. Environment policy conforms to ISO - 14001 which is an international standard released by International Standards Organization (ISO).

** The Whistle Blower Policy and Code of Conduct are overseen by the Audit Committee of the Board of Directors of the Company and Corporate Social Responsibility Policy is overseen by the Corporate Social Responsibility Committee of the Board of Directors of the Company. Prevention of Sexual Harassment Policy is being overseen by Internal Complaints Committee (ICC) constituted under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The grievance, if any, arising out of Whistle Blower Policy, Code of Conduct and Prevention of Sexual Harassment Policy is being redressed by the respective committees which oversee them.

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

S. No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
1.	The Company has not understood the Principles									
2.	The Company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3.	The Company does not have financial or manpower resources available for the task									
4.	It is planned to be done within next 6 months									
5.	It is planned to be done within the next 1 year									
6.	Any other reason (please specify)									

Not Applicable

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3. Governance related to Business Responsibility

- (a) **Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year.**

The management regularly monitors the Business Responsibility initiatives and a complete assessment is done on need based and annually.

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

The Business Responsibility Report is published annually as part of the annual report. The same can be accessed at our website.

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1: ETHICS, TRANSPARENCY AND ACCOUNTABILITY

1. **Does the policy relating to ethics, bribery and corruption cover only the Company? (Yes/No)**

No.

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

Yes, it is applicable to suppliers and contractors. The Company plans to extend the applicability of the same on the other entities going forward.

2. **How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words.**

1 (One) shareholder complaint was received and resolved in FY 2020-21.

PRINCIPLE 2: BUSINESS SHOULD PROVIDE GOODS AND SERVICES THAT ARE SAFE AND CONTRIBUTE TO SUSTAINABILITY THROUGHOUT THEIR LIFE CYCLE.

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

The Company is engaged in the manufacturing of Automotive Lamps, Plastic moulded Parts and Frame Chassis. Although, these products have insignificant social or environmental concern or risk, the Company follows strict adherence processes in compliance with the statutory norms.

2. **For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):**

- a) Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain.

Not applicable.

- b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?

The Company always make efforts for optimum utilization of natural resources.

3. **Does the Company have procedures in place for sustainable sourcing (including transportation)?**

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

It is difficult to ascertain the percentage of inputs sourced from these suppliers accounting towards total inputs due to different kind of materials being used by the Company. Our sourcing strategy takes into consideration the environmental, social and ethical factors besides economic factors. The Company has an environment policy and safety policy.

Yes, the Company has a procurement policy in place for purchase of goods and raw material. The Company has identified the regional vendors for different components/materials based on QCDDS (Quality, Cost, Development, Deliver & Services) criteria.

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

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

Yes, the Company has dedicated Supplier Quality Assurance (SQA) and Safety team who hand hold, mentoring to all supplier partners and evaluate their performance periodically. The team visits their facilities, analyse quality related aspects, safety measures and create action plans jointly with the suppliers, for necessary improvement.

5. **Does the Company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as 10%). Also, provide details thereof, in about 50 words or so.**

The nature of the Company's business is such that there are no significant emissions or process wastes. The Company recycle materials (< 2%) wherever possible else disposed off in compliance with applicable statutory provisions.

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PRINCIPLE 3: BUSINESS SHOULD PROMOTE THE WELLBEING OF ALL EMPLOYEES

1. **Please indicate the Total number of employees :**
On roll 1,001, Casuals/Contractual 1,785
2. **Please indicate the Total number of employees hired on temporary/contractual/casual basis :**
Total numbers is 1,785
3. **Please indicate the Number of permanent women employees :** 38
4. **Please indicate the Number of permanent employees with disabilities :** 1
5. **Do you have an employee association that is recognized by management :** Yes
6. **What percentage of your permanent employees is members of this recognized employee association :** 17%
 1. **Please indicate the number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year.**

S. No.	Category	No. of complaints received during the financial year	No. of complaints pending as on March 31, 2021
1	Child labour/ forced labour/ involuntary labour	Nil	Nil
2	Sexual harassment	Nil	Nil
3	Discriminatory employment	Nil	Nil

2. **What percentage of your under mentioned employees were given safety and skill upgradation training in the last year?**

No.	Category	% Employees that were given safety training	% Employees that were given skill upgradation training
1	Permanent Employees	37	40
2	Permanent Women Employees	60	72
3	Casual/Temporary/Contractual Employees	98	88
4	Employees with Disabilities	100	100

PRINCIPLE 4: BUSINESS SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TOWARDS ALL STAKEHOLDERS, ESPECIALLY THOSE WHO ARE DISADVANTAGED, VULNERABLE AND MARGINALIZED

1. **Has the Company mapped its internal and external stakeholders? Yes/ No**
Yes.
Our stakeholders both internal and external, play a significant role in expressing our values, carrying out our mission, developing strategies, implementing processes and fostering long-term relationships. Internal and external stakeholders include Employees, Shareholders, Investors, Customers, Regulatory bodies, Supply chain partners, CSR beneficiaries, Governments.
2. **Out of the above, has the Company identified the disadvantaged, vulnerable and marginalized stakeholders?**
Yes.
3. **Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.**
Yes, the Company has identified the disadvantaged, vulnerable & Marginalized stakeholders viz. unemployed & unskilled youth, people having limited or no access to basic education. The Company has taken initiatives to engage with the disadvantaged, vulnerable, marginalized stakeholders as per its CSR policy.

PRINCIPLE 5: BUSINESS SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

1. **Does the Policy of the Company on human rights cover only the Company or extend to the group/ joint venture/ suppliers/ contractors / NGOs/ others?**
The Company respect the dignity of all individuals and communities and adhere to the principles of Human Rights. The Company

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has adopted Code of Conduct and whistle blower policy. These policies are applicable to employees of Lumax Auto Technologies Limited. The underlining principles are communicated to all the vendors, suppliers and distributors and other key business associates of the Company, which they are expected to adhere to while dealing with the Company.

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

Stakeholder	Complaints Received during FY 2020-21	Complaints Resolved during FY 2020-21	Complaints Resolved (%)
Whistle Blower	Nil	NA	NA
Sexual Harassment	Nil	NA	NA
Shareholders	1	1	100

PRINCIPLE 6: BUSINESS SHOULD RESPECT, PROTECT AND MAKE EFFORTS TO RESTORE THE ENVIRONMENT

- 1. Does the Policy related to Principle 6 covers only the Company or extends to the group/ joint ventures/ suppliers/ contractors / NGOs/ others?**

The Environment Policy is applicable to the Company across all its Plants situated in India. The vendors are governed by their respective policies. Adherence to environmental laws and regulations is one of the pre-requisites for awarding a contract to any vendor.

- 2. Does the Company have strategies / initiatives to address global environmental issues such as climate change, global warming etc.? Y/N. If yes, please give hyperlink for webpage etc.**

The Company has been undertaking various initiatives to address environmental issues. The emissions or waste generated by the Company are within the permissible limits specified by the Central Pollution Control Board (CPCB) and/or specific State Pollution Control Board (SPCB). Company's Certain plants are certified under ISO 14001 Standards for Environment Management Systems (EMS).

- 3. Does the Company identify and assess potential environmental risks?**

Yes, the Company regularly reviews its environmental risks and undertakes initiatives to mitigate them.

- 4. Does the Company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if yes, whether any environmental compliance report is filed?**

The Company continues to work towards development and implementation of climate change mitigation mainly through energy saving projects (including generation of power through wind mills and solar) across the Company. However, we do not have any registration of CDM projects.

- 5. Has the Company undertaken any other initiatives on clean technology, energy efficiency, renewal energy etc.? if yes, please give hyperlink for webpage etc.**

The measures introduced by the Company for conservation of energy at its plant locations are contained in the Report on Conservation of Energy and Technology Absorption which forms part of the Board's Report.

- 6. Are the Emissions/ Waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?**

Yes.

- 7. Number of show cause/ legal notices received from CPCB/ SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.**

There is no pendency for any show cause/legal notice received.

PRINCIPLE 7: BUSINESS WHEN ENGAGED IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A RESPONSIBLE MANNER

- 1. Is your Company a member of any trade and chamber or association? If yes, name only those major ones that your business deals with:**

The Company is a member of several leading Industry Associations, including:

- ACMA- Automotive Component Manufactures Association
- SIAM- Society of Indian Automobile Manufactures
- CII- Confederation of Indian Industries

- 2. Have you advocated /lobbied through above associations for the advancement or improvement of public good? Yes/ No, if yes specify the broad areas**

The Company is taking up various suggestions / issues related to trade to the relevant authorities through these associations.

PRINCIPLE 8: BUSINESS SHOULD SUPPORT INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

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

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Lumax is committed to support various programs under India's identified Sustainable Development Goals (SDGs). In line with the SDGs, the Company is committed to support quality education & good health. Education as a means to uplift the level of the future generation and make them capable citizens of the country. Today, the Company is involved in providing and supporting career counselling, life-skills & soft-skills programs as also provide scholarships to bridge the education gap and limit drop out ratio of senior school students. These programs are undertaken in communities and schools in the vicinity of our plants, after assessing the needs in the community as also the schools.

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

The Programmes are undertaken through the Corporate Social Responsibility arm of the Company namely Lumax Charitable Foundation team and implementation partners.

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

The CSR Committee reviews the progress of the initiatives for all the projects and programmes to assess the desired outcome on the society. Since most of the projects have been done for less than 3 years, the impact study is yet not done.

4. What is your company's direct contribution to community development projects amount in INR and the details of the projects undertaken?

For details on Company's contribution to its CSR projects and programmes, please refer 'Annexure-H Annual Report on CSR activities', to the Board's report for FY 2020-21.

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words or so.

Our initiatives are in the schools to bring about changes in the lives of the students and indirectly impacting the communities in terms of social changes and economic improvement in future. Also support preventive and curative health initiatives to ensure good health of the communities, these are able to sensitize and generate awareness amongst communities to take care of their health and make lifestyle changes.

Yes, the Company regularly monitors CSR initiatives to ensure that they are properly implemented and sustain within communities.

PRINCIPLE 9: BUSINESS SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CUSTOMERS AND CONSUMERS IN A RESPONSIBLE MANNER

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

The Company caters to two, three, four-wheeler, commercial vehicle and off-road vehicle Original Equipment Manufacturers ("OEMs"). There is a strong mechanism defined in the Company to deal with issues and complaints reported by OEMs. OEMs communicate issues through their quality rating shared via e-mail communications, during their visits to plants or at meetings for which the corrective actions are planned to resolve and eliminate the problem(s) witnessed.

The Company also caters to retail market through its aftermarket division. The Complaints for the products sold in aftermarket can be raised through the following mode:

- Communicate the complaint at the customer care desk at local representative/ distributor.

There is no complaint which is pending attention and requisite action at Company's end.

2. Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes/ No/ NA / Remarks (additional information)?

Yes.

The Company's product are OEM specific and as per OEM requirements, the Company displays product requirement of OEM. The typical information displayed on product includes details of manufacturing date, manufacturing shift and customer part number. The details other than above which are mandatory as per applicable motor vehicle law are mentioned at specified locations.

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

No.

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

Yes. The Company do take the feedback from the customers with the endeavour to achieve the highest level of satisfaction and to perform their operations accordingly. The Company has received various awards from different customers for meeting and exceeding their targets, which are mentioned in the annual report.