

BUSINESS RESPONSIBILITY REPORT

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

1. Corporate Identity Number (CIN) of the Company	L74899DL1981PLC012804
2. Name of the Company	Lumax Industries Limited
3. Registered address	2 nd Floor, Harbans Bhawan-II, Commercial Complex, Nangal Raya, New Delhi-110046 Tel. +91-11 49857832
4. Website	www.lumaxworld.in/lumaxindustries
5. E-mail id	lumaxshare@lumaxmail.com
6. Financial Year reported	2020-21
7. Sector(s) that the Company is engaged in (industrial activity code-wise)	Automotive Lamp Activity Code: 2740
8. List three key products/services that the Company manufactures/provides (as in balance sheet)	Head Lamp, Tail Lamp & other Auxiliary lamps (Fog Lamp, High Mount Stop Tail Lamp)
9. Total number of locations where business activity is undertaken by the Company (a) Number of International Locations (Provide details of major 5) (b) Number of National Locations	Company has One Design Center in Taiwan Company has 10 Manufacturing Plants in India at below mentioned locations: <ul style="list-style-type: none"> Gurugram, Dharuhera, Manesar, Bawal (Haryana) Pant Nagar, Haridwar (Uttarakhand) Chinchwad, Chakan (Pune, Maharashtra) Bengaluru (Karnataka) Sanand (Gujarat) Besides, Company has two Government approved R&D Centers (Gurugram, Haryana & Chakan, Pune)
10. Markets served by the Company – Local/State/National/International	Local/State/National/International markets.

SECTION B: FINANCIAL DETAILS OF THE COMPANY (STANDALONE)

Financial Details of the Company		Amt ₹ in Lakhs	
		FY 2020-21	FY 2019-20
1	Equity Share Capital	934.77	934.77
2	Total Turnover		
	a) Revenue from operations	1,42,598.07	1,60,158.72
	b) Other Income	2,523.38	966.19
3	Total Profit after taxes	1,703.85	7,230.69

4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)

The Company has spent an amount of ₹ 163.81 Lakhs (including unspent amount of ₹ 46.54 Lakhs pertaining to ongoing projects, which have been deposited in separate accounts as per applicable law). (detailed in the Annexure G which forms part of the Annual Report).

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

Education, Health and COVID relief.

SECTION C: OTHER DETAILS

Sr. No.	Particulars	Details
1	Does the Company have any Subsidiary Company/ Companies?	No
2	Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(ies)	N.A.
3	Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%	The Company encourage its other stakeholders i.e. suppliers, distributors etc. in the value chain to participate in its BR initiatives, however it does not track the actual participation.

SECTION D: BR INFORMATION

1. Details of Director/Directors responsible for BR

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

- DIN Number: 03616096
- Name: Mr. Vineet Sahni
- Designation: CEO and Senior Executive Director

(b) Details of the BR head

Sr. No.	Particulars	Details
1	DIN	03616096
2	Name	Mr. Vineet Sahni
3	Designation	CEO and Senior Executive Director
4	Telephone Number	0124-4760000
5	Email id	lumaxshare@lumaxmail.com

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

Principle 1 (P1)	Principle 2 (P2)	Principle 3 (P3)
Business should conduct and govern themselves with Ethics, Transparency and Accountability	Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle	Business should promote the well-being of all employees
Principle 4 (P4)	Principle 5 (P5)	Principle 6 (P6)
Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized	Businesses 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)
Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner	Business should support inclusive growth and equitable development	Businesses 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)

Sr. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
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/lumaxindustries/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.

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

Sr. No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The Company has not understood the Principles	NOT APPLICABLE								
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)									

3. Governance related to BR

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

The BR Head periodically assesses the BR performance of the Company.

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

This BRR forms part of the Annual Report of the Company that is published. The Annual Report is uploaded on the website of the Company <https://www.lumaxworld.in/lumaxindustries/annual-report.html>

SECTION E: PRINCIPLE-WISE PERFORMANCE

Principle 1

1. Does the policy relating to ethics, bribery and corruption cover only the Company? Yes/ No. Does it extend to the Group/ Joint Ventures/ Suppliers/Contractors/NGOs /Others?

All employees working in the Company are governed by the Company's policies on Ethics, Transparency and Accountability along with the Code of Conduct. The Company also has in place a Whistle Blower Policy. The Company's Code of Conduct and policy on Ethics, Transparency & Accountability addresses subjects like bribery, corruption, compliance to the Company's standards of business conduct and ethics and ensures compliance with regulatory requirements.

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 or so.

Stakeholder	Complaints Received during FY 2020-21	Complaints Resolved during FY 2020-21	Complaints Resolved (%)
Investors	165	165	100
Employees (Whistle Blower)	Nil	N.A.	N.A.

Principle 2

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 business of manufacturing of automotive lamps i.e. Head Lamps, Tail lamps and other auxiliary lamps. Although these products have insignificant social or environmental concern or risk, the Company follows strict adherence processes in compliance with the statutory norms.

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

The Company has taken/always take efforts for optimum utilization of all 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.

Yes, The Company has a procurement policy in place for purchase of goods and raw material. The Company evaluates the performance for all the vendors on the basis of Productivity, Quality, Cost, Delivery, Development, Safety and Response.

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, mentor all supplier partners and evaluate their performance periodically. The team visits their facilities, analyze quality related aspects, safety measures and create action plans jointly with the suppliers, for necessary improvement. The Company has also established DOJO (training centre) centre at various supplier premises as per customer requirement for continual improvement in productivity, quality and reduction in cost.

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 <5%, 5-10%, >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 (< 5%) wherever possible else disposes off in compliance with applicable statutory provisions.

Principle 3

- Please indicate the Total number of employees. On roll – 2,493; Casuals/Contractuals – 3,135
- Please indicate the Total number of employees hired on temporary/contractual/casual basis - 3,135
- Please indicate the Number of permanent women employees. 263
- Please indicate the Number of permanent employees with disabilities - NIL
- Do you have an employee association that is recognized by management. - YES
- What percentage of your permanent employees is members of this recognized employee association – 23.6%
- 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.

No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
1	Child labour/forced labour/involuntary labour	0	0
2	Sexual harassment	1	0
3	Discriminatory employment	0	0

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

No.	Category	% Employees that were given safety training	% Employees that were given skill upgradation training
1	Permanent Employees	35%	38%
2	Permanent Women Employees	45%	47%
3	Casual/Temporary/Contractual Employees	93%	92%
4	Employees with Disabilities	N/A	N/A

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Principle 4

1. Has the Company mapped its internal and external stakeholders?

Yes.

Both internal and external of the Company, play a significant role in expressing Company 's values, carrying out 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, etc.

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

Yes

3. Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

Yes, the Company 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

1. Does the policy of the Company on human rights cover only the Company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?

Company respects the dignity of all individuals and communities and adheres to the principles of Human Rights. The Company has adopted Code of Conduct and whistle blower policy. These policies are applicable to all employees of the Company. 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 (%)
Employees (Whistle Blower)	Nil	N.A.	N.A.
Employees (Sexual Harassment)	1	1	100
Shareholders	165	165	100

Principle 6

1. Does the policy related to Principle 6 cover only the Company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.

The Environment Policy is applicable to the Company across all its Plants and Offices. 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? Y/N

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

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- 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, the Company does not have any registration of CDM projects.

- 5. Has the Company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.**

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.**

1 (One).

Principle 7

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

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

- ACMA - Automobile Component Manufacturers Association,
- SIAM - Society of Indian Automobile Manufacturers
- 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 (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)**

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

Principle 8

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

In keeping with India's Sustainable Development Goals identified by the Niti Aayog, The Company is committed to support – Quality Education and Good Health for the disadvantaged communities around its plant locations. Education means acquiring knowledge, literacy, numeracy and various skills in diverse fields that are vital to life and existence.

Providing quality education to these children, the Company intends helping them to secure a better and brighter future. These interventions will help them to improve themselves, learn new things, explore opportunities to lead a respectable life in society.

Today, the Group is involved in providing and supporting career counselling, life-skills & soft-skills programs as also provide scholarships to bridge the education gap and control the dropout ratio of senior school students. These programs are undertaken after carefully assessing the needs in the community as also the schools in the vicinity of plants.

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

The team at Lumax Charitable Foundation, the Corporate Social Responsibility arm of the Company and implementation partners, undertake these programmes.

- 3. Have you done any impact assessment of 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 about 3 years, which include online interventions due to the pandemic in 2020, the impact study is yet not conducted.

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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 to 'Annexure – G (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.

The interventions and initiatives in the schools are primarily to build capacity of the children to make decisions and take actions that positively impact their lives and the lives of those around them. A primary goal is to promote well-being and benefit the communities in terms of social changes and economic improvement in the time to come.

Also, support preventive and curative health initiatives to ensure the well-being of the communities, sensitising and generating awareness to focus on their health and make positive lifestyle changes.

The Company regularly monitors CSR initiatives to ensures proper implementation.

Principle 9

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

The company is engaged with OEMs (Original Equipment Manufacturer's) in Passenger Vehicle, Two Wheeler, 3 Wheeler, Commercial Vehicle and Off Road vehicle segment. With the increased quality requirements laid down by OEMs and expectations of the end customer, there is a very strong focus of the organization to supply products with Zero Defects and highest standard of Quality. From OEM perspective, the organization receives monthly quality performance which accesses the performance of the organization for the products supplied. And to ensure above par performance the organization is in continual discussion with OEMs to monitor the performance on daily basis and ensure swift response in case of any concern/ issue reported at customer end.

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

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

The company does not have any open customer complaints/consumer cases pending at the end of the financial year.

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

Yes.

The products supplied by the company are proprietary items hence the information which can be displayed on the products has to be in line with OEM specific requirements and vehicle regulations. The information which is displayed on the product typically carries details related to manufacturing date, shift, assembly line and customer part number. The other details which are required to be present on the product as per vehicle regulation are mentioned on the specified and agreed 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 year. 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 takes and received feedback from its various customers and based on the feedback received necessary improvisations are done to meet or exceed customer satisfaction. The same is evident from the awards bestowed on the organization for meeting and exceeding the targets, the details of the awards are mentioned in the annual report.