

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT



SECTION

A

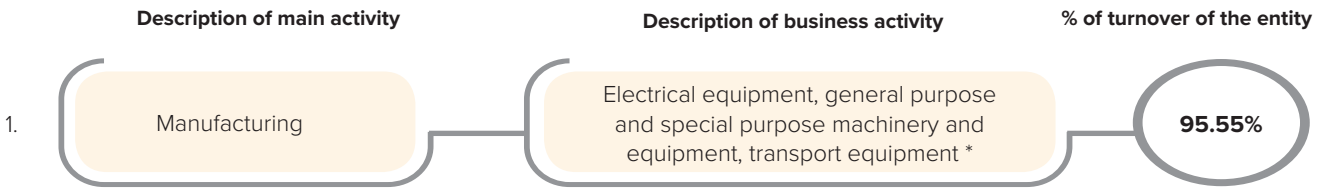
## GENERAL DISCLOSURES

### i. DETAILS OF THE LISTED ENTITY

1.	<b>Corporate Identity Number (CIN) of the Listed Entity</b>	▶	L74899DL1981PLC012804
2.	<b>Name of the listed entity</b>	▶	Lumax Industries Limited (The 'Company')
3.	<b>Year of incorporation</b>	▶	1981
4.	<b>Registered office address</b>	▶	2nd Floor, Harbans Bhawan-II Commercial Complex, Nangal Raya New Delhi -110046
5.	<b>Corporate address</b>	▶	Plot no. 878, Udyog Vihar, Phase V, Gurugram - 122 016, Haryana, India
6.	<b>E-mail</b>	▶	<a href="mailto:contactbrsr.lil@lumaxmail.com">contactbrsr.lil@lumaxmail.com</a>
7.	<b>Telephone</b>	▶	0124-4760000
8.	<b>Website</b>	▶	<a href="https://www.lumaxworld.in/lumaxindustries">https://www.lumaxworld.in/lumaxindustries</a>
9.	<b>Financial year for which reporting is being done</b>	▶	2022-2023
10.	<b>Name of the Stock Exchange(s) where shares are listed</b>	▶	BSE Limited and National Stock Exchange of India Limited
11.	<b>Paid-up capital</b>	▶	₹ 9,34,77,320
12.	<b>Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report</b>	▶	Mr Raajesh Kumar Gupta, 0124-4760000, <a href="mailto:contactbrsr.lil@lumaxmail.com">contactbrsr.lil@lumaxmail.com</a>
13.	<b>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)</b>	▶	The disclosure under this report have been made on Standalone basis.

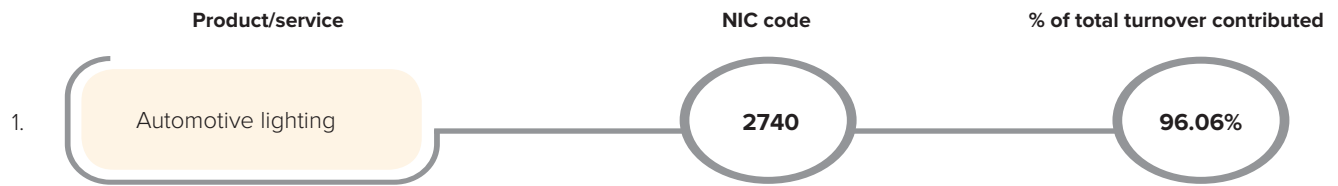
## ii. PRODUCTS/SERVICES

### 14. Details of business activities (accounting for 90% of the turnover):



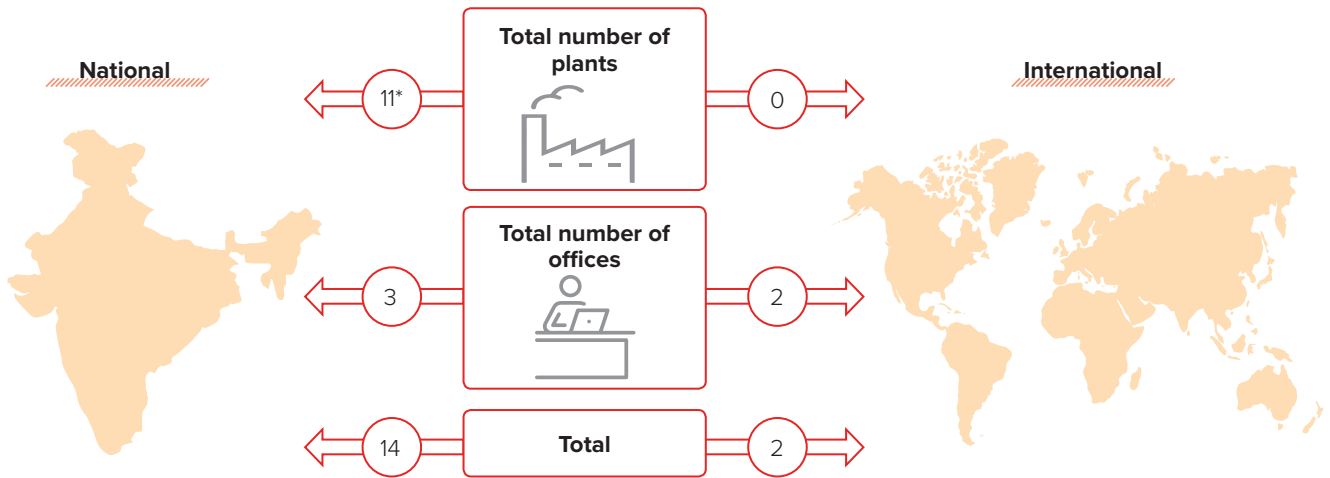
\* These details are in line with Form No. MGT-7 prescribed by MCA.

### 15. Products/services sold by the entity (accounting for 90% of the entity's turnover):



## iii. OPERATIONS

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



\* The operations of the Gurugram plant of the Company have been closed with effect from May 31, 2023.

This map is a generalized 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.

### 17. Markets served by the entity:

#### a. Number of locations

Locations	Number
National (No. of states)	14
International (No. of countries)	5

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

1.55% of the total turnover of the entity is contributed through exports.

**c. A brief on types of customers:**

The Company is engaged in the automobile lighting business, which provides a full range of premium quality automotive lighting solutions for four-wheelers, two-wheelers and commercial vehicles, catering to automobile manufacturing in India and global markets. The sales are mainly through Business to Business (B2B) model to Original Equipment Manufacturers (OEMs). The Company has a distinguished and esteemed customer base, which includes Maruti Suzuki, Tata Motors, Mahindra & Mahindra, MG Motors, Toyota Kirloskar, Hero Motocorp, Honda Motors, TVS and Suzuki Motors.

**iv. EMPLOYEES**
**18. 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)	1,276	1,200	94.04%	76	5.96%
2	Other than permanent (E)	0	0	0.00%	0	0.00%
3	<b>Total employees (D + E)</b>	1,276	1,200	94.04%	76	5.96%
<b>Workers</b>						
4	Permanent (F)	1,238	1,147	92.65%	91	7.35%
5	Other than permanent (G)	3,208	2,609	81.33%	599	18.67%
6	<b>Total workers (F + G)</b>	4,446	3,756	84.48%	690	15.52%
<b>b. Differently abled employees and workers</b>						
<b>Differently abled employees</b>						
1	Permanent (D)	1	1	100.00%	0	0.00%
2	Other than permanent (E)	0	0	0.00%	0	0.00%
3	<b>Total differently abled employees (D + E)</b>	1	1	100.00%	0	0.00%
<b>Differently abled workers</b>						
4	Permanent (F)	0	0	0.00%	0	0.00%
5	Other than permanent (G)	0	0	0.00%	0	0.00%
6	<b>Total differently abled workers (F + G)</b>	0	0	0.00%	0	0.00%

## 19. Participation/inclusion/representation of women

Board of Directors			Key Managerial Personnel (KMP)		
No. and % of females			No. and % of females		
Total (A)	No. (B)	% (B/A)	Total (A)	No. (B)	% (B/A)
12	1	8.33%	7	0	0%

\*5 Key Management Personnel are also included in the Board of Directors as mentioned above.

## 20. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2022-23 (Turnover rate in current FY)			FY 2021-22 (Turnover rate in previous FY)			FY 2020-21 (Turnover rate in the year prior to the previous FY)		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent employees	28%	44%	29%	23%	23%	23%	19%	22%	19%
Permanent workers	49%	60%	50%	43%	22%	41%	51%	47%	50%

## V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

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

Name 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)
SL Lumax Limited	Associate	21.28%	No
Lumax Industries Czech s.r.o.	Wholly-Owned Subsidiary	100%	No

**vi. CSR DETAILS**
**22.**

Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No)

Turnover (in ₹)

Net worth (in ₹)

**Yes**
**2319.52 Crore**
**481.41 Crore**
**vii. TRANSPARENCY AND DISCLOSURES COMPLIANCES**
**23. 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 <i>(Yes/No) (If yes, then provide web-link for grievance redress policy)*</i>	FY 2022-23 Current financial year			FY 2021-22 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	0	0	-	0	0	-
Investors (other than shareholders)	No	0	0	-	0	0	-
Shareholders	Yes	3	0	-	3	0	-
Employees and workers	Yes	0	0	The enquiry was concluded on the complaint which was received on March 25, 2022. This complaint was disposed off on November 10, 2022.	1	1	The complaint was received on March 25, 2022.
Customers	Yes	83	0	-	136	0	-
Value chain partners (Productive suppliers)	Yes	0	0	-	0	0	-
Other (please specify)	-	-	-	-	-	-	-

\*The Company's stakeholders include Customers, Suppliers, Employee/Workers, Business Partners, Board of Directors, Promoters, Government, Institution/Industry Bodies, Community, Society and Investors. The Company has a strong Grievance Redressal Mechanism through various policies and procedures across all operations. For example, the Company has a well-defined Vigil Mechanism/Whistle-Blower Policy ([https://www.lumaxworld.in/lumaxindustries/pdf/vigil-mechanism-whistle-blower-policy\\_LIL.pdf](https://www.lumaxworld.in/lumaxindustries/pdf/vigil-mechanism-whistle-blower-policy_LIL.pdf)), Anti-Bribery Policy (available on Company's Intranet) and Policy on Prevention of Sexual Harassment of Women at Workplace (<https://www.lumaxworld.in/lumaxindustries/pdf/policy-on-prevention-of-sexual-harassment-of-women.pdf>) for all of its female employees to allow for the expression of concerns and grievances. Further, there is a defined Escalation matrix for the Company's productive suppliers for addressing their grievances. In addition to this, the Company through its Legal and Secretarial Department takes care of other stakeholders' grievances.

## 24. 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	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Waste management	 	Handling and disposal of waste pose as a risk. Waste reduction together with enhanced circular economy and performance has added environmental benefits as opportunity.	Disposal of waste through authorized recyclers.	Together with some negative implications, this would largely have a positive impact on cost-cutting opportunities through waste management, as the manufacturing process generates waste as a by-product.
2	Water management		Reduction in consumption in the Company's business processes.		This would have minor financial implications as the Company has already taken significant initiatives to reduce water consumption and recycle it efficiently in past. Hence there seems to be a little scope for further efficient use of water.
3	Climate and environmental action		Global warming and industry operation and transition risk.	Climate change and industry transition are now embedded in the Company's risk management process.	There may be negative financial consequences for failing to implement mitigating strategies. However, the Company is committed to taking positive steps in the right direction.
4	Energy	 	Use of energy is an inevitable part of the Company's operations. However, efficient use and the implementation of own renewable energy sources will help in improving Company's operations.	Active energy management and transition to ISO 50001.	In the short-term, there may be a negative financial impact from investing on Solar Generators; however, in the long-term there would be a positive financial impact from methodical use of energy sources and aligning with industry expectations.
5	Emissions		Challenging roadmap to address Scope 3 Green House Gases (GHG) emissions with respect to value chain partners.	Roadmap for Scope 1 and 2 GHG emission is being designed with committed timelines. Furthermore, the collaboration for detailed strategies to address Scope 3 GHG emission for the entire supply chain of the Company will help address the issue in a progressive manner.	There may be negative financial consequences for failing to implement the designed roadmap and future strategies. However, the Company is committed to taking positive steps in the right direction.
6	Employee health and safety	 	<p>In a company, managing safety and health is an essential component of running a business. Therefore, businesses must conduct a risk assessment to identify hazards and risks in their workplace(s) and implement actions to successfully control them.</p> <p>The Company is committed to continuous improvement in health and safety best practices worldwide, in accordance with its global SHE policy, for all employees and workers.</p>	There are several initiatives and programs that have been implemented to cover all aspects of health and safety management and are being actively monitored for continuous improvement.	There may be some financial investments in terms of taking measures for employee safety; that would, in turn have a significantly high positive impact on employee health and their confidence in the Company's culture in the long run, which would attract new talent and help retain the existing employees.

S. no.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7	Diversity and equality		Insufficient diversity across the group to find the right talent to balance the diversity equation.	Improved hiring techniques, demonstrating the Company's value and culture to attract a diverse talent pool.	There may be minor financial implications while strategizing improved hiring techniques and systems.
8	Community	 	Health and safety as risk. Talent attraction and retention as opportunity.	Socio-economic compliance.	Probable positive and negative financial impacts.
9	Employee engagement		Increased loyalty and productivity.		Neutral financial impact.
10	Risk management		Risk evaluation to mitigate negative business performance and capitalize on the opportunities.		Positive financial impact.
11	Ethics and compliance	 	Regulatory risk with respect to operating in multiple jurisdictions and culture. Healthy and safe environment and freedom to speech as opportunity.	Compliances with the Code of Conduct, Annual Ethics Training program, Grievance Redressal Mechanism and periodic Compliance Audits.	Probable and negative financial impact for regulatory breach.
12	Products and innovation		Product enhancement, diversification and value additions aligned with industry trends. Further, environmental aspects are further to be considered in product design.		Positive financial impact.
13	Management Systems		Increased efficiency, agility, consistency and productivity across the entire Company.		Positive financial impact.



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.

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	Policies as prescribed under Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 are uploaded on the website of the Company, which can be accessed at the link mentioned below. <a href="https://www.lumaxworld.in/lumaxindustries/policies.html">https://www.lumaxworld.in/lumaxindustries/policies.html</a> Other policies are uploaded on the Company's Intranet and are not publicly available.								
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 Company's policies extend to certain value chain partners as well.								
4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) 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</li> <li>• ISO 14001</li> <li>• ISO 45001</li> <li>• ISO 27001</li> <li>• ISO 50001</li> <li>• ESD S2020</li> <li>• ISO 9001</li> </ul>								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	<p>The Company is developing an Environment, Social and Governance (ESG) Roadmap with defined commitments, goals and targets has also has identified some of the Environmental and Social Key Performance indicators (KPIs) which include:</p> <ul style="list-style-type: none"> <li>• Assessment of Scope 1, 2 and 3 GHG emissions.</li> <li>• Promoting the use of renewable energy and reducing overall energy consumption.</li> <li>• Zero waste to landfills.</li> <li>• Implementing zero liquid discharge mechanism across the Company's plants.</li> <li>• Promoting plastic alternatives in daily use and the use of returnable packaging.</li> <li>• Foster a successful and diverse workplace.</li> <li>• Promoting diversity and inclusion.</li> <li>• Enhancing suppliers' diversity.</li> <li>• Enhancing learning environment for the workforce.</li> </ul>								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	The Company's endeavor has always been to fit and comply with its initiatives within the ESG framework. From the current year onwards, the Company has started restructuring and revamping most of its initiatives within particular ESG boundaries. Therefore, the Company would start reporting the performance of the entity against the specific commitments, goals and targets from next year onwards.								



<b>Governance, leadership, and oversight</b>	
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements ( <i>listed entity has flexibility regarding the placement of this disclosure</i> )	<p>Lumax Industries Limited is committed to the inclusive growth objectives strengthening its efforts to align itself with the 'United Nations' 17 Sustainable Development Goals (SDGs). The Company is further committed to preserve the 3Ps (People, Planet and Prosperity) of Sustainability.</p> <p>In an increasingly complex and changing world, businesses are constantly facing new challenges and risks, which are evolving due to climate change, environmental degradation, loss of biodiversity, rising inequality, increasing expectations from local communities and associated regulatory changes.</p> <p>The Company being a responsible corporate citizen, will continuously strive to improve its performance towards environmental and social impacts while maintaining focus on strong Corporate Governance. The Company at the Board of Directors' level oversees its ESG/Sustainability initiatives.</p> <p>In a way, Sustainability is at the core of everything the Company does, in line with its purpose to be the leader in automotive technology products. The Company has its sights set firmly on helping to bring the future of mobility to the global consumers faster. Since it consistently delivers best-in-class products, exceeding consumer expectations, it would help the Company to build lasting bonds within the automotive industry.</p> <p>In terms of Environment initiatives, the Company's focus is on minimizing climate change, reducing GHG emissions, bringing energy efficiency and reducing water consumption.</p> <p>For Social initiatives, the Company emphasizes on workforce management, improved Company culture, balancing Diversity and Inclusion, Learning and Development, Occupational Health and Safety, Human Rights and Supplier Diversity.</p> <p>Regarding Governance, the Company strives to make better ESG Management, Business Integrity, Cyber-Security, Board Diversity and Policy and Reporting.</p> <p>While the Company's endeavor has always been to fit and comply with its initiatives into ESG framework; from the current year onwards, it has started restructuring and revamping most of its initiatives to fit into particular ESG boundaries, therefore, it would start reporting the achievements from the next reporting year onwards.</p>
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	<p>For the Financial Year ended March 31, 2023, Mr Vineet Sahni, CEO and Sr. Executive Director was responsible for implementation and overseeing the Business Responsibility Policies.</p> <p>Subsequent to year end, Mr Vishnu Johri, CEO has been nominated for the said responsibility.</p>
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.	<p>No specified Committee of the Board responsible for sustainability-related issues has been formed. However, Mr Raajesh Kumar Gupta, Executive Director is responsible for decision making on sustainability-related issues.</p>

**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	Department heads, Business heads and Executive Directors examine the Company's policies on a regular basis or when necessary. The efficacy of the policies is examined during this assessment and any necessary modifications to policies are done and updated procedures are implemented.																	
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The Company complies with all currently applicable regulations.																	

	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 Company has not carried out independent assessment/evaluation of the workings of its policies by an external agency.								

**12. If answer to question (1) above is “No” i.e. not all Principles are covered by a policy, reasons to be stated:**

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)	Not applicable								
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 entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

**PRINCIPLE 01**  
 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 programs on any of the principles during the Financial Year:**

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programs
Board of Directors	2	ESG Awareness Technical Updates	75%
Key Managerial Personnel	1	ESG Awareness	100%
Employees other than BoDs and KMPs	208	<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>	100%

Segment	Total number of training and awareness programs held	Topics/principles covered under the training and its impact	% age of persons in respective category covered by the awareness programs
Workers	241	<ul style="list-style-type: none"> <li>• <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> </li> <li>• <b>Skill Upgradation</b> <ul style="list-style-type: none"> <li>- Posh Awareness</li> <li>- ESG Awareness</li> <li>- Cyber Security Training</li> <li>- Quality Control Circle (QCC) Trainings</li> <li>- Process Trainings</li> <li>- Behavioral Trainings</li> <li>- Maintenance-related Trainings</li> <li>- Induction Trainings</li> <li>- Finance Trainings</li> <li>- Cost Cutting Trainings</li> <li>- New Product Development Trainings</li> <li>- Software Trainings</li> <li>- SAP Trainings</li> <li>- MIS Trainings</li> <li>- Resource Conservation Trainings</li> </ul> </li> </ul>	100%

**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 Settlement Compounding fee	No material fines/penalties/punishment/award/compounding fees/settlement amount were levied/paid in proceedings by the Company or by Directors/KMPs with Regulators/Law Enforcement Agencies/Judicial Institutions during the financial year.				

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	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	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
Not Applicable.	

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 Company has an Anti-Corruption and Bribery Policy, which is available on the Company's Intranet, that can be accessed by all the employees.

Lumax Industries Limited is committed to maintain sound standards of Business Conduct and Corporate Governance, wherein the Company follows a zero-tolerance approach towards Bribery and Corruption.

The purpose of this Policy is to establish adequate procedures in order to prevent the Company's involvement in any activity relating to bribery, corruption or facilitation payments.

The Policy is mandatory for all the Company's employees and other business partners working on behalf of the Company from anywhere in the world.

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 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil



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

	FY 2022-23 (Current financial year)		FY 2021-22 (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	-

**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.**

Not applicable, as there were no cases of corruption and conflicts of interest were reported during the year.

**Leadership Indicators**

**1. Awareness programs conducted for value chain partners on any of the principles during the financial year:**

<b>Total number of awareness programs held</b>	<b>Topics/principles covered under the training</b>	<b>% age of value chain partners* covered (by value of business done with such partners) under the awareness programs</b>
1	Awareness session on BRSR compliance of SEBI for Suppliers	47% of all productive suppliers

\* This assessment includes only the productive suppliers. Other categories of value chain partners are not included.

**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 Company has a Code of Conduct for Board of Directors and Senior Management. This Code lays down the roles and responsibilities of the Board of Directors and Senior Management.

The Code specifies that the Directors and Senior Management shall always act in good faith to promote the business and objectives of the Company for the members as a whole and in the best interests of the Company, its employees, shareholders, the community and shall not engage in any business, relationship or activity, which may be in conflict with the interests of the Company.

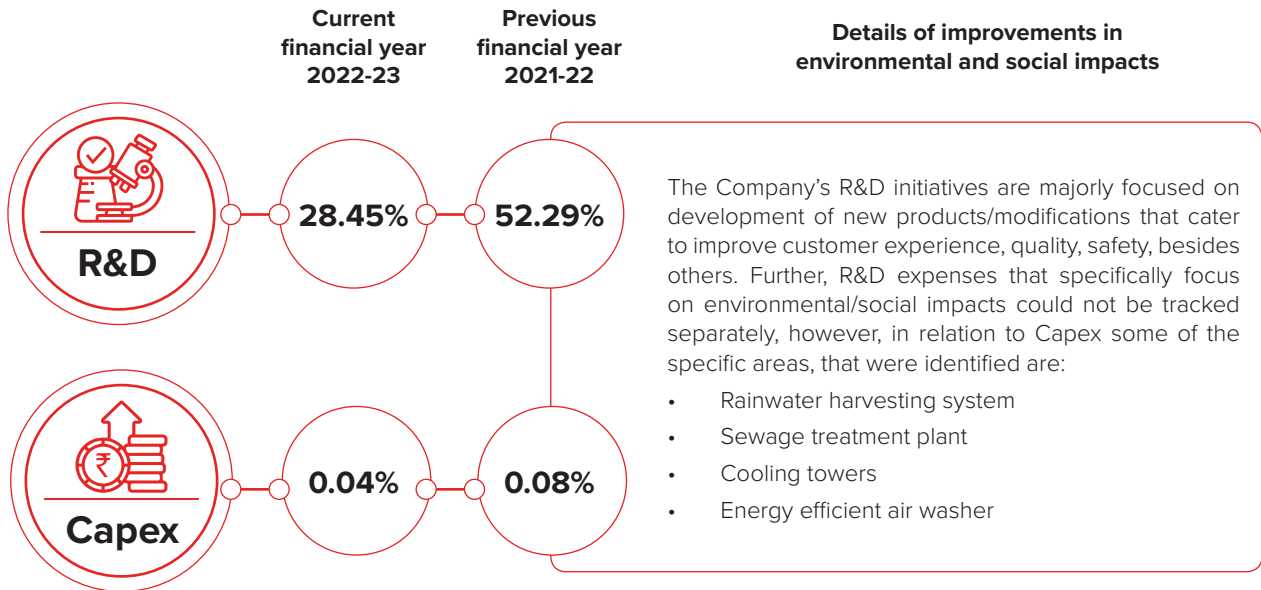
In case of any probable conflict of interest, he/she should make full disclosure of all the facts and circumstances thereof to the Board of Directors and the Audit Committee.

PRINCIPLE  
**02**

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

**Essential Indicators**

- 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.



**2.**

- a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Yes, the Company has procedures in place for sustainable sourcing. The Company considers Social, Ethical and Environmental performance factors in the process of selecting suppliers. The Company's supplier selection, assessment and evaluation process includes elements of Sustainability, this process also includes initial supplier survey, continuous risk evaluations and periodic audits and assessments.

- b. If yes, what percentage of inputs were sourced sustainably?**

All productive suppliers were assessed on parameters of sustainable sourcing and results were compiled. These suppliers are mandated to adhere to the Company's Supplier's Code of Conduct, which comprises certain aspects such as Labor Law Compliance and Human Rights, Occupational Health and Safety, Environmental Protection and Ethical Business among others.

- 3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

The Company's products are delivered directly to OEMs, hence the Company's options for reclaiming them at the end of their life cycle are limited. The Company, on the other hand, has procedures in place to recycle plastics, e-waste, and hazardous waste in a safe manner. Furthermore, multiple measures are taken by the Company to further reduce waste generation and reuse and recycle it.

**4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes/No). 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.**

Yes, EPR is applicable to the Company's activities in FY 2022-23. Out of 5 states, where the Company operates, 4 of the States (Uttarakhand, Gujarat, Maharashtra and Karnataka) are registered with Pollution Control Board (PCB) and Registration Certificates have been issued. For the state of Haryana, the application has been filed, and registration status is showing as 'In Process' on the EPR Portal. On an overall basis, the waste collection plan is in line with the EPR plan submitted to PCB.

**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 Company has not carried out the LCA for any of its products so far. However, the Company is planning to do the same in the near future.

**2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products/services, as identified in the Life Cycle Perspective/Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

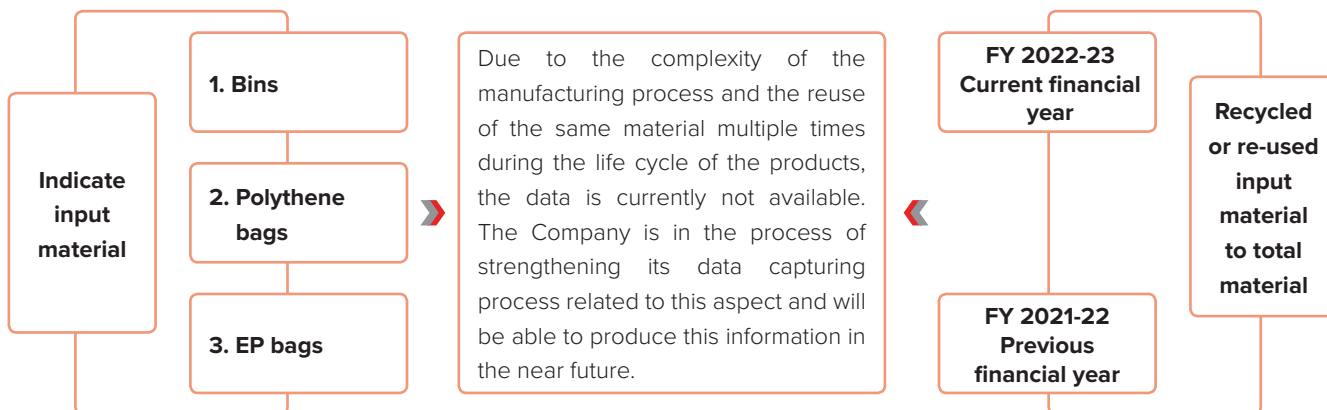
Name of product/service	Description of the risk/concern	Action taken
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Not applicable, as the Company is in the process of carrying out the LCA in the coming years.





**3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**



**4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:**

	FY 2022-23 Current financial year			FY 2021-22 Previous financial year		
	Re-used	Recycled	Safely disposed	Re-used	Recycled	Safely disposed
Plastics (including packaging)	Not applicable, as the Company directly supplies its products to OEM customers as a B2B Tier-1 supplier; therefore, it does not have a business model focused on end-of-life recovery of the final product.					
E-waste						
Hazardous waste						
Other waste						

**5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.**



Not applicable, as the Company directly supplies its products to OEM customers as a B2B Tier-1 supplier; therefore, it has limited scope for reclaiming it at the end of its life cycle.



PRINCIPLE  
**03**

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	1,200	1,200	100.00%	1,200	100%	0	0.00%	1,200	100%	0	0.00%
Female	76	76	100.00%	76	100%	76	100.00%	0	0.00%	44	57.89%
<b>Total</b>	<b>1,276</b>	<b>1,276</b>	<b>100.00%</b>	<b>1,276</b>	<b>100%</b>	<b>76</b>	<b>5.96%</b>	<b>1200</b>	<b>94.04%</b>	<b>44</b>	<b>3.45%</b>
<b>Other than permanent employees</b>											
Male	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Female	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>

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

Category	% of workers 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	1,147	1,147	100.00%	1,147	100.00%	0	0.00%	718	62.60%	0	0.00%
Female	91	91	100.00%	91	100.00%	91	100%	0	0.00%	91	100.00%
<b>Total</b>	<b>1,238</b>	<b>1,238</b>	<b>100.00%</b>	<b>1,238</b>	<b>100.00%</b>	<b>91</b>	<b>7.35%</b>	<b>718</b>	<b>58.00%</b>	<b>91</b>	<b>7.35%</b>
<b>Other than permanent workers</b>											
Male	2,609	2,609	100.00%	2,609	100.00%	0	0.00%	0	0.00%	0	0.00%
Female	599	599	100.00%	599	100.00%	599	100.00%	0	0.00%	0	0.00%
<b>Total</b>	<b>3,208</b>	<b>3,208</b>	<b>100.00%</b>	<b>3,208</b>	<b>100.00%</b>	<b>599</b>	<b>18.67%</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>

**2. Details of retirement benefits, for current financial year and previous financial year.**

FY 2022-23 Current financial year			Benefits	FY 2021-22 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.)
100%	100%	Y	PF	100%	100%	Y
100%	100%	Y	Gratuity	100%	100%	Y
100%	100%	Y	ESI	100%	100%	Y
-	-	-	Others-please specify	-	-	-

**3. Accessibility of workplaces**

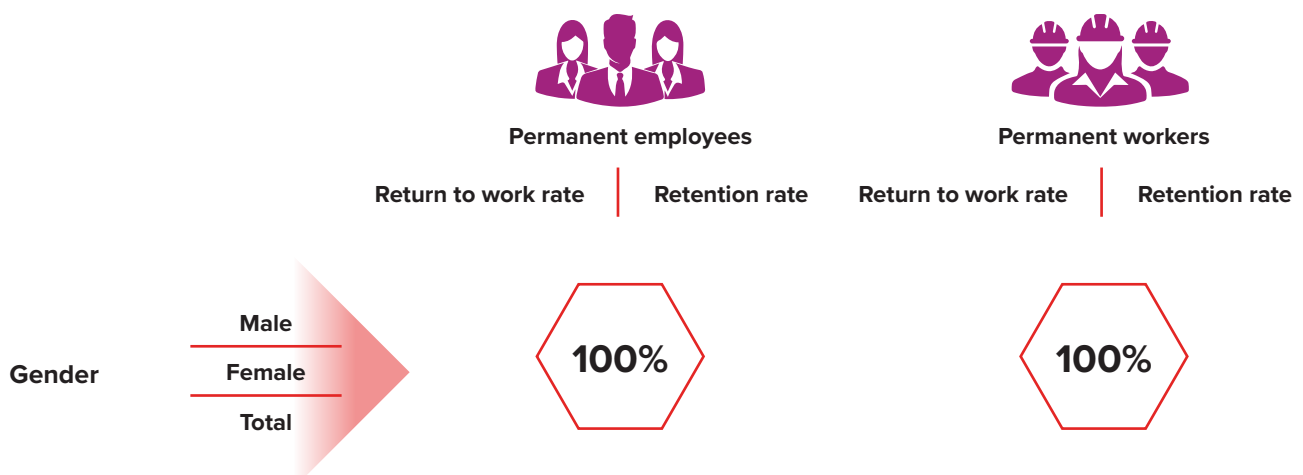
Are the premises/offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

The premises/offices of the Company are also accessible to differently abled employees and workers together with normal employees, barring a few places/locations/manufacturing facilities due to safety considerations and the specific design and structure of certain places.

**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 Company has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016, which is available on the Company's intranet.

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

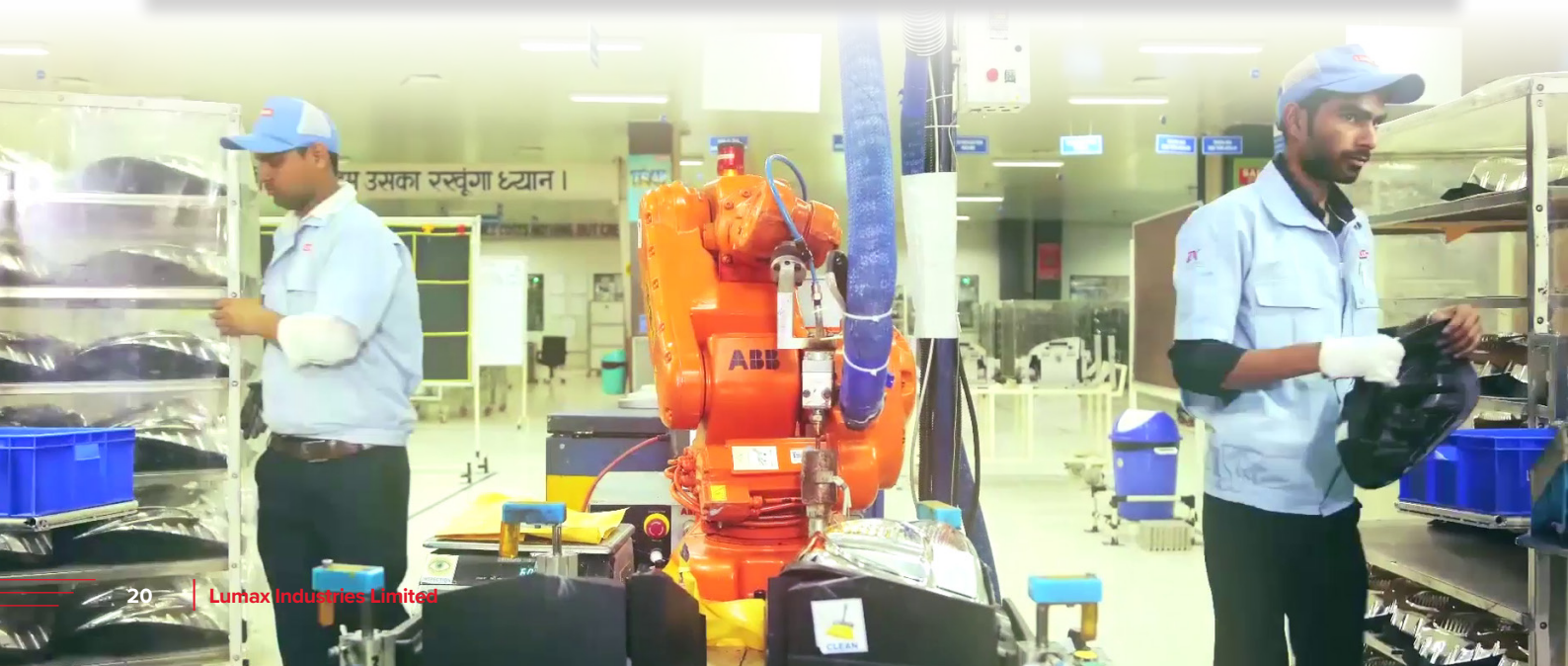


**6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.**

Yes/No (If yes, then give details of the mechanism in brief)	
Permanent workers <hr/> Other than permanent workers <hr/> Permanent employees	<p>Yes, the Company's Vigil Mechanism/Whistle-blower Policy is available for all categories of permanent employees and workers. The said mechanism provides for the adequate safeguards against unfair treatment of employees who wish to raise any concern and also provides direct access to the Chairman of the Audit Committee in appropriate/exceptional cases.</p>
Other than permanent employees	<p>N/A</p>

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

Category	FY 2022-2023 (Current financial year)			FY 2021-2022 (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>1,276</b>	<b>0</b>	<b>0.00%</b>	<b>1,191</b>	<b>0</b>	<b>0.00%</b>
Male	1,200	0	0.00%	1,117	0	0.00%
Female	76	0	0.00%	74	0	0.00%
<b>Total permanent Workers</b>	<b>1,238</b>	<b>401</b>	<b>32.39%</b>	<b>1,090</b>	<b>408</b>	<b>37.43%</b>
Male	1,147	399	34.79%	1,001	403	40.26%
Female	91	2	2.20%	89	5	5.62%




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

Category	FY 2022-23 Current financial year					FY 2021-22 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	1,200	1,159	96.58%	872	72.67%	1,117	728	65.17%	682	61.06%
Female	76	223	293.42%*	145	190.79%*	74	59	79.73%	59	79.73%
<b>Total</b>	<b>1,276</b>	<b>1,382</b>	<b>108.31%*</b>	<b>1,017</b>	<b>79.70%</b>	<b>1,191</b>	<b>787</b>	<b>66.08%</b>	<b>741</b>	<b>62.22%</b>
<b>Workers</b>										
Male	3,756	1,769	47.10%	1,622	43.18%	3,295	996	30.23%	1,075	32.63%
Female	690	531	76.96%	429	62.17%	464	278	59.91%	376	81.03%
<b>Total</b>	<b>4,446</b>	<b>2,300</b>	<b>51.73%</b>	<b>2,051</b>	<b>46.13%</b>	<b>3,759</b>	<b>1,274</b>	<b>33.89%</b>	<b>1,451</b>	<b>38.60%</b>

\*Due to high attrition rate during the year, since the closing number at year end is less than the average number during the year, therefore the % as mentioned above is higher than 100%.

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

FY 2022-23 Current financial year			Category	FY 2021-22 Previous financial year		
Total (A)	No. (B)	%(B)/(A)		Total (C)	No. (D)	%(D)/(C)
<b>Employees</b>						
1,200	1,200	100%	Male	1,117	1,117	100%
76	76	100%	Female	74	74	100%
<b>1,276</b>	<b>1,276</b>	<b>100%</b>	<b>Total</b>	<b>1,191</b>	<b>1,191</b>	<b>100%</b>
<b>Workers</b>						
1,147	1,147	100%	Male	1,001	1,001	100%
91	91	100%	Female	89	89	100%
<b>1,238</b>	<b>1,238</b>	<b>100%</b>	<b>Total</b>	<b>1,090</b>	<b>1,090</b>	<b>100%</b>

**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 Company has implemented an Occupational Health and Safety Management System and it is an integral component of the Company's business. The Company's endeavor is to create an environmentally friendly system for its employees that is gentle on their health and safety through the use of the following mechanisms:

- Continuously improving the environmental Occupational Health and Safety performance
- Establishing an incident-free work environment
- Maintaining proper disposal of waste and pollutants
- Keeping waste to a minimum to preserve natural resources
- Compliance with applicable legal compliances
- Encouraging innovation for prevention of pollution, injury and ill health

Further, the Company is ISO 45001 certified and covers 80% of its plants.

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

Hazard Identification Risk Assessment (HIRA) is a process, established by the Company for defining and describing hazards by characterizing their probability, frequency, and severity and evaluating adverse consequences, including potential losses and injuries. A risk assessment that provides the factual basis for activities is included in the corporate safety strategy to reduce losses from identified hazards at the workplace. While carrying out Hazard Assessment, all the activities including routine and non-routine in each section are selected and a Hazard Assessment is conducted to identify the significant risks. For all the significant risks, control measures are defined to mitigate the risks. For routine activities- the Company has a Safety Audit check sheet having 188 check points and it covers all the processes (main gate, chemical store, maintenance and utility, scrap yard and hazardous waste, hot work area, molding section, surface treatment, assembly, tool room, loading and unloading, store area, office, canteen, top roof, solar system, robotic area, legal & others points. For non-routine activities, the Company has a work permit system like for height work and excavation work etc. and also uses the hazard identification technique.

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

Yes, the Company has processes for workers to report work-related hazards and to remove themselves from such 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 Company have access to non-occupational medical and healthcare services.



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

Safety Incident/Number	Category	FY 2022-23	FY 2021-22
		Current financial year	Previous financial year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.15	0
	Workers	0.15	0.45
Total recordable work-related injuries	Employees	1	0
	Workers	1	3
No. of fatalities	Employees	0	0
	Workers	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	0	0

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


The Company prioritizes the health and safety of its employees and considers them its most valuable asset. 80% of the plants of the Company are certified Occupational Health and Safety Management Systems as per ISO 45001. In addition to the inputs provided under question No. 10 above, some of the mitigation strategies to stop or mitigate adverse effects on occupational health and safety include:

- Daily safety patrolling with the Plant Head, Maintenance Head and Safety Officers to identify unsafe acts and conditions
- Safety audit process by plant safety officers
- Internal Safety Review with all the Safety Committee Members (including all Process in Charges, Workers' Committee Members, Maintenance Head, Safety Officer and Plant Head)
- Corporate Safety Audits are done once every 2 months with specific check sheet that covers all processes
- Safety trainings are in place for covering various areas
- The Medical rooms are equipped with basic emergency care equipment and medicines

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

	FY 2022-23			FY 2022-21		
	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:**




**Health & safety practices**

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

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95% of the plants and offices were assessed internally by the Company.



**Working conditions**

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

---

95% of the plants and offices were assessed internally by the Company.

**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.**

At Lumax Industries Limited, safety at the workplace is of prime importance and is of utmost priority for all. The Company has always focused on creating and ensuring a culture of safety, focusing on the Company’s responsibility towards the health and safety of each employee and worker. The Company has set up a unique system w.r.t. safety inspections, operation control, monitoring, audits, assessments and others. As a result of these, gaps are identified, learning needs are established, further improvements are done, and further controls are implemented and tracked for a better compliance framework.

In specific, there were some identified areas where there was some scope for improvement with respect to chemical spillage on floor while arranging the products in racks. To address these issues, following corrective actions were taken:

- Spill kit placed at loading and unloading areas
- Drain flow of spillage is collected in the collecting pit
- All racks are sloped towards the drain
- Anti-slip shoes added to PPE to avoid slip and trip
- All racks are provided with fall prevention





**Leadership Indicators**

**1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).**

Yes, the Company extends life insurance and other compensatory packages in the event of the death of employees and workers.

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

Through various means the Company ensures that the statutory dues applicable are deducted and deposited by the identified value chain partners. The Company follows the process as outlined in the Company's Supplier Code of Conduct. The Company makes sure that the supply chain partners comply with the same spirit to depict and ensure that as extended business partners they also support the business responsibility principles of the Company and assume equal accountability. The Company further ensures that before paying the contractor, the suppliers have deposited the required statutory dues deducted. The Company also ensures that the suppliers have also filed required regulatory returns on a timely basis. The Company also obtains the revenant underlying documents, which prove as an evidence/which is an evidence in itself.

**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 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
Employees	0	0	0	0
Workers	0	0	0	0

**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 Company hires retired employees or retains them in case of specific vacancies within the organization. In most cases, an agreement for one year is done with them and it is renewed based on their performance and any further vacancies in the organization.

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




**Health & safety practices**

**% of value chain partners\* (by value of business done with such partners) that were assessed**

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39% of all productive suppliers



**Working conditions**

**% of value chain partners\* (by value of business done with such partners) that were assessed**

---

39% of all productive suppliers

\* This assessment includes only the productive suppliers. Other categories of value chain partners are not included.

**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.**

There were some instances of entrapment in moving parts (Molding machine) found with certain value chain partners and their business operations, causing injuries including bruising and fractures to their workers. The following corrective actions were taken or are underway to address these risks/concerns arising from assessments of health and safety practices and working conditions of these value chain partners:

- Dual-channel interlocks are used to stop mold parts from moving while guards are open
- Fixed guards are used to prevent it from reaching the moving parts. Further, guards are interlocked to prevent movement
- Guard interlocks are maintained in a safe operational condition.



**PRINCIPLE**  
**04**

Businesses should respect the interests of and be responsive to all its stakeholders


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

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

- Detailed discussion around the same is done with the Company's Legal and Secretarial Department and the management and key stakeholder groups are identified.
- Key stakeholders are identified on the basis of the material influence they have on the Company or on how they are materially influenced by the Company's corporate decisions and the consequences of those decisions.

**2. List stakeholder groups identified as key for our Company 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	Emails, meetings and website	Need-based	Product-related, price negotiations, technological advancement etc.
Suppliers	No	Emails, meetings and website	Need-based	Product-related, price negotiations, technological advancement etc.
Employees/workers	No	Emails, meetings and website	Need-based	Company policies, organizational structure, important developments
Partners	No	Emails and meetings	Quarterly and need-based	Business-related dealings, technological advancement, new product-related etc.
Board of Directors	No	Emails and meetings	Quarterly and need-based	Financial results, internal controls, limited review and audit reports etc.
Promoters	No	Emails and meetings	Need-based	Issues requiring decisions, budget, future planning, customer complaints, quality issues, safety-related concerns etc.

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
Government	No	Emails	Need-based	Compliance and Policy-related matters
Institutions/industry Bodies (Banks/ NBFC/ACMA/SIAM)	No	Emails and meetings	Need-based	Industrial development-related; finance-related
Community/society (CSR/ESG)	No	Emails and meetings	Need-based	Society, health and education-related
Investors	No	Emails and meetings	Quarterly and need-based	Financial and operational performance-related

## 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.**

The appropriate Company's personnel, business leaders, and key process heads conduct stakeholder consultations. Necessary Board Committees, such as the Audit Committee, Nomination and Remuneration Committee, CSR Committee, Risk Management Committee, and Share Transfer/Stakeholders Relationship Committee, are used to elevate comments and problems of Company concerns to the Board of Directors' level. The Company has consistently insisted that regular and proactive contact with its key stakeholders through conference calls helps it more effectively explain its plans and results. The Company is able to further the notion of shared prosperity and progress for both the Company and society at large via ongoing participation.

**2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes/No). 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 consultation was used to support the identification and management of environmental and social topics. The process for the consultation and the Board on economic, environmental and social topics includes:

- A comprehensive listing of all the possible stakeholders and ESG-related matters applicable to the Company and the Automobile Industry is finalized in consultation with the Company's different departments
- The same is then discussed amongst different stakeholders and the Senior Management personnel of the Company and feedback is taken from the said consultations. Further, instances of the said consultation process on these topics are incorporated into the policies and activities of the entity

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

As a part of the Life Skills Project, engagement with the community was initiated to eliminate prevailing social issues like the high dropout ratio of girls and consumption of tobacco by students etc. These issues were also discussed during the awareness sessions with different groups of different ages. Counselling was also provided, as and when required, to the families of the girls highlighting the importance of education and that they should continue to send the kids to school.

To promote education and attract students to enrol in the schools, Lumax Industries Limited strengthened the school's infrastructure by building additional classrooms. The Company also built separate toilets for girls and boys respectively, promoting safe sanitation.



PRINCIPLE  
**05**

Businesses should Respect and Promote Human Rights


 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 2022-2023 Current financial year			FY 2021-22 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	1,276	703	55.09%	1,191	797	66.92%
Other than permanent	0	0	0%	0	0	0%
<b>Total employees</b>	<b>1,276</b>	<b>703</b>	<b>55.09%</b>	<b>1,191</b>	<b>797</b>	<b>66.92%</b>
<b>Workers</b>						
Permanent	1,238	752	60.74%	1,090	442	40.55%
Other than permanent	3,208	0	0%	2,669	0	0%
<b>Total workers</b>	<b>4,446</b>	<b>752</b>	<b>16.91%</b>	<b>3,759</b>	<b>442</b>	<b>11.76%</b>

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

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

Category	FY 2022-23 Current financial year					FY 2021-22 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>Employees</b>										
<b>Permanent</b>										
Male	1,200	0	0%	1,200	100%	1,117	0	0%	1,117	100%
Female	76	0	0%	76	100%	74	0	0%	74	100%
<b>Other than permanent</b>										
Male	0	0	0%	0	0%	0	0	0%	0	0%
Female	0	0	0%	0	0%	0	0	0%	0	0%

Category	FY 2022-23 Current financial year					FY 2021-22 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>Workers</b>										
<b>Permanent</b>										
Male	1,147	0	0%	1147	100%	1001	0	0%	1001	100%
Female	91	0	0%	91	100%	89	0	0%	89	100%
<b>Other than permanent</b>										
Male	2,609	2,609	100%	0	0%	2,294	2,294	100%	0	0%
Female	599	599	100%	0	0%	375	375	100%	0	0%

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

**Male**

Number	Median remuneration/salary/wages of respective category
5	53,66,400
7	53,66,400
1,193	5,56,212
1,147	2,32,488


**Female**

Median remuneration/salary/wages of respective category	Number
0	0
0	0
3,77,496	76
2,10,468	91

\* Directors to whom the remuneration is paid

\*\* Including 5 Directors

**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 Company has a well-defined Human Rights Policy, giving rights to the employees to have their complaints or grievances addressed by the Human Resource department or to the Senior Management. The Corporate HR Head is responsible for addressing human rights impacts or issues caused or contributed to by the employees and workers of the Company. Further, the respective Head of the Departments are responsible for their respective business connections for addressing human rights impacts or issues caused by or contributed to by the business. The Senior Management also gets involved in reviewing the Human Rights Policy at an organizational level.

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

The Company aims to defend, protect, and promote human rights in order to ensure fair and ethical business and employment practices. Respect for human rights is one of the Company's fundamental and essential principles.

The Company has various internal mechanisms in place to redress grievances related to human rights issues which include:

- POSH Policy
- Grievance Redressal Policy
- Vigil Mechanism/Whistle Blower Policy
- Employee app to register their grievances

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

	FY 2022-23 Current financial year			FY 2021-22 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	0	0	The enquiry was concluded on the complaint which was received on March 25, 2022. This complaint was disposed off on November 10, 2022.	1	1	The complaint was received on March 25, 2022.
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	-



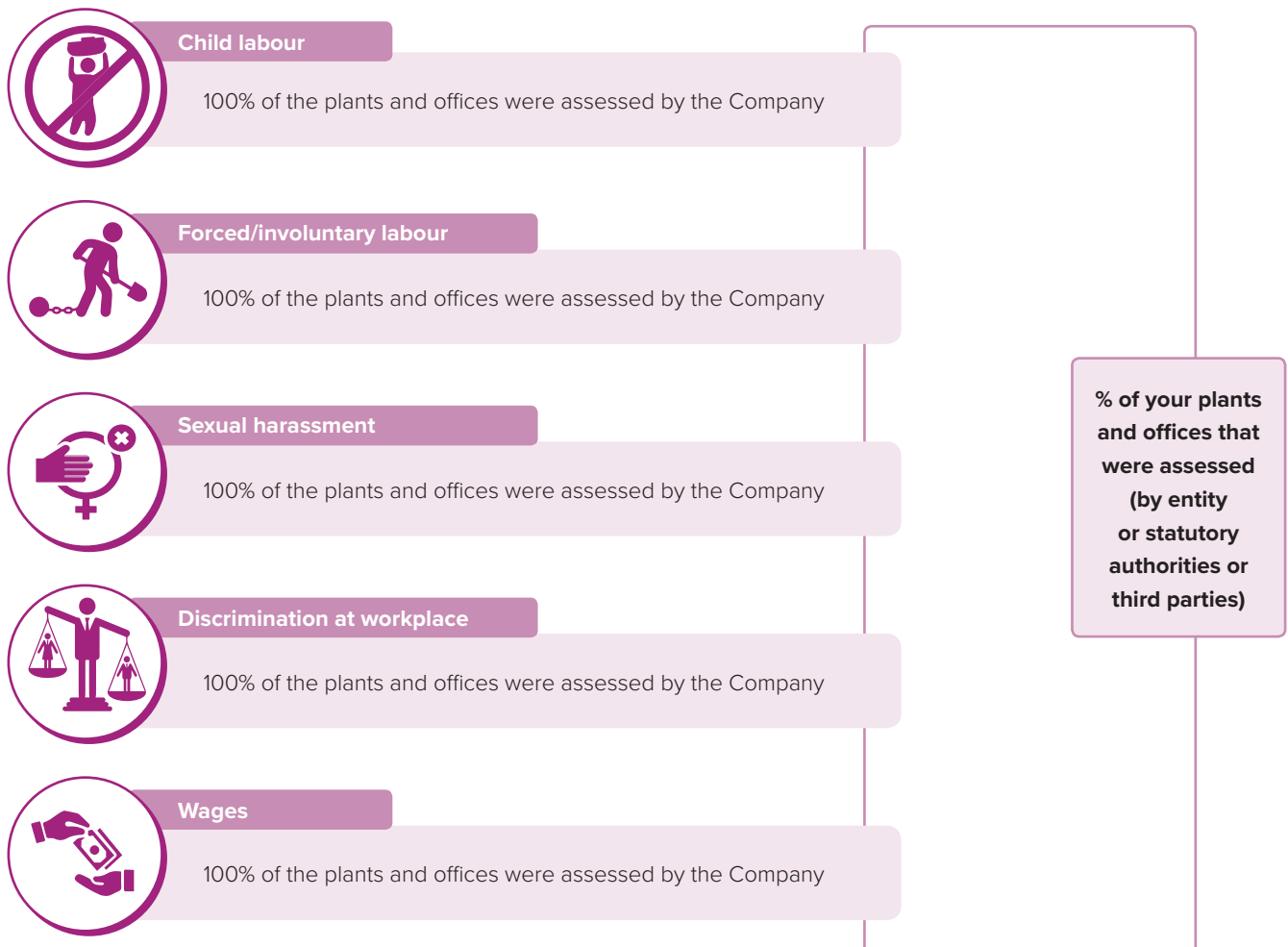
**7. Mechanisms to prevent adverse consequences to the complainant in discrimination harassment cases.**

The Company has policies in place to safeguard complainants from victimization, retaliation, and other unfair employment practices. In cases of discrimination and harassment, the Company guarantees that the complainants are completely protected from harassment, or other forms of action by the wrongdoer. In the Company's Grievance Redressal Policy, Whistle Blower Policy, and Policy on Prevention of Sexual Harassment (POSH), there are specific clauses regarding the confidentiality of the complainant that state that all reports/records associated with complaints, along with the information exchanged during a specific process/investigation, would be considered confidential and access to the same would be restricted to authorized personnel as designated by the management of the Company.

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

The Company endeavors to incorporate fundamental human rights in all of its business agreements and contracts in spirit. In most of these agreements/contracts these rights are also embedded formally. The Company is further revisiting and revising these agreements/contracts as a formal mechanism of regular revision and to strengthen this practice further.

**9. Assessments for the year:**



**10. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 9 above.**

No significant risks/concerns arising from the assessments at Question 9 above were noticed during the year. However, there was one single case on account of POSH complaint. The specific Committee addressed the matter and resolved that satisfactorily. As a matter of the Company's corporate practice, any specific significant risks/concerns that arise from any assessment are duly addressed by the Company's respective Committees, comprising both internal and external stakeholders.



**Leadership Indicators**

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

No significant grievances were received during the year on account of Human Rights. As a matter of practice, generally, through the Code of Conduct, together with other policies and procedures of the Company, human rights are reiterated across the business processes of the Company. The Company regularly imparts the requisite training sessions to all of its employees and workers and keeps on updating its Code of Conduct and other policies and procedures based on risks/concerns that arise and feedback received during the year.

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

As explained in point No. 1 above, the Company keeps taking initiatives to embed human rights in 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/offices of the Company are also accessible to differently abled visitors, barring a few places/locations/manufacturing facilities due to safety considerations and the specific design and structure of certain places.

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



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

No significant risks/concerns were identified from assessments of the specified value chain partners in Question 4 above.



PRINCIPLE  
**06**

Businesses should respect and make efforts to protect and restore the environment.

Essential Indicators

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

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
Total electricity consumption (A)- (Mega Joules) (Non- renewable sources)	24,02,93,701.81	18,05,02,034.40
Total fuel consumption (B) - (Mega Joules)	1,05,69,716.00	80,86,093.80
Energy consumption through other sources (C)- (Mega Joules) (from renewable sources)- Self generated and purchased from third party	6,37,80,750.00	4,85,74,723.36
Total energy consumption (A+B+C) - (Mega Joules)	31,46,44,167.81	23,71,62,851.56
Energy intensity per rupee of turnover (Total energy consumption/turnover in rupees)	0.0136	0.0135
Energy intensity (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.

No independent assessment/evaluation/assurance has been carried out by an external agency.

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.

Not applicable, as the Company does not have any sites/facilities identified as DCs under the PAT Scheme of the Government of India.



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

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	27,683	16,911
(ii) Groundwater	85,532	67,363
(iii) Third party water	62,911	19,447
(iv) Seawater/Desalinated water	0	0
(v) Others	0	0
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	<b>1,76,126</b>	<b>1,03,721</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>1,76,126</b>	<b>1,03,721</b>
<b>Water intensity per rupee of turnover</b> (Water consumed/turnover)	0.0076	0.0059
<b>Water 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.

No independent assessment/evaluation/assurance has been carried out by an external agency.

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

Yes, the Company has installed Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STPs) to treat the waste water at 8 of its plants, wherein the Company reuses the treated water for gardening and other non-potable purposes. In addition to the above, the Company also optimizes its water consumption through rainwater harvesting at the majority of its plant locations.

**5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

Parameter	Please specify unit	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
NOx			
SOx			
Particulate matter (PM)			
Persistent organic pollutants (POP)			
Volatile organic compounds (VOC)			
Hazardous air pollutants (HAP)			
Others-please specify			

Currently, the details of these emissions are not available with the Company. However, the Company has initiated the necessary procedures to gather this data in the near future.

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, as no independent assessment/evaluation/assurance has been carried out by an external agency.

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

Parameter	Unit	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
Total Scope 1 emissions (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	Currently, the details of GHG emissions (Scope 1 and Scope 2 emissions) are not available with the Company. However, the Company has initiated the necessary procedures to gather this data in the near future.	
Total Scope 2 emissions (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		
Total Scope 1 and Scope 2 emissions per rupee of turnover			
Total Scope 1 and Scope 2 emission intensity (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, as no independent assessment/evaluation/assurance has been carried out by an external agency.

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

As mentioned in Question No. 6 above, while the details of GHG emissions are currently not available with the Company, the Company has taken up various projects to reduce GHG emissions on an overall basis, which include:

- Use of green power generated through the Company's own solar plants and purchased from third-parties, which contributes to 21.76% of the Company's total electricity
- Plantations of trees
- Further, in FY 2023-24, the Company has initiated the strategy for decarbonization and it would start reporting these parameters from next financial year onwards

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

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
<b>Total waste generated (in metric tonnes)</b>		
Plastic waste <b>(A)</b>	993.40	838.40
E-waste <b>(B)</b>	40.90	15.90
Bio-medical waste <b>(C)</b>	0.03	0.002
Construction and demolition waste <b>(D)</b>	1.80	4.80
Battery waste <b>(E)</b>	1.40	0.00
Radioactive waste <b>(F)</b>	0.00	0.00
Other Hazardous waste. Please specify, if any. <b>(G)</b> (ETP Sludge, Paint Sludge, Hydraulic Oil, Used Oil, Cotton waste, Scrap Plastic Broken Bins, BMC Scrap Runner, Used DG Set Oil)	313.40	202.10

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
Other Non-hazardous waste generated <b>(H)</b> . Please specify, if only (Break-up by composition i.e. by materials relevant to the sector) (BMC Scrap, e-waste, wooden scrap, scrap garbage, scrap used corr. Box, Scrap Tin, Iron Scrap, Aluminium Scrap, Foam Cover, Carton Boxes)	701.70	829.30
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>2,052.60</b>	<b>1,890.50</b>
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
<b>Category of waste</b>		
(i) Recycled	0.00	0.00
(ii) Re-used	31.60	43.00
(iii) Other recovery operations	155.20	129.80
<b>Total</b>	<b>186.80</b>	<b>172.80</b>
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
<b>Category of waste</b>		
(i) Incineration	0.02	0.001
(ii) Landfilling	0.00	0.00
(iii) Other disposal operations	1,865.80	1,717.70
<b>Total</b>	<b>1,865.82</b>	<b>1,717.70</b>

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.

No independent assessment/evaluation/assurance has been carried out by an external agency.

**9. 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.**

Waste generation being an inevitable part of the manufacturing process, efforts have been made to create value from waste. With the aim of diverting a significant amount of waste from going to landfills, the Company has adopted systems and procedures that help repurpose used material and reintroduce excess material into the production process. The Company follows the '3R' strategy of Reduce, Reuse and Recycle for its waste management. The Company follows legally prescribed procedures and applies environmentally sound disposal techniques for disposing of the hazardous waste, whereas the non-hazardous waste is sold to the authorized recyclers, as identified by the Company. Further, to reduce the wastage of water, the Company has installed ETPs and STPs at 8 of its plants, wherein the Company reuses the treated water for gardening and other non-potable purposes. In addition to the above, the Company also optimizes its water consumption through rainwater harvesting at the majority of its plant locations.

**10. 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:**

S.No	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
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Not applicable, since there are no operations of the Company near the above-mentioned areas.

**11. 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
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No environmental impact assessment of projects was undertaken by the Company during the current financial year. Hence, this requirement is not applicable.

**12. 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:**

Yes, the Company is compliant with all the applicable environmental laws/regulations/guidelines in India.

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
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Not applicable, since there is no non-compliance with the applicable environmental laws/regulations/guidelines in India.

**Leadership Indicators**

**1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:**

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
<b>From renewable resources</b>		
Total electricity consumption (A) (Mega Joule)- Self Generated and Purchased from third party	6,37,80,750.00	4,85,74,723.36
Total fuel consumption (B)	0	0
Energy consumption through other sources (C)	0	0
<b>Total energy consumed from renewable sources (A+B+C) (Mega Joule)</b>	<b>6,37,80,750.00</b>	<b>4,85,74,723.36</b>
<b>From non-renewable resources</b>		
<b>Total electricity consumption (D)</b>	24,02,93,701.81	18,05,02,034.40
Total fuel consumption (E)	1,05,69,716.00	80,86,093.80
Energy consumption through other sources (F)	0	0
<b>Total energy consumed from non-renewable sources (D+E+F) (Mega Joule)</b>	<b>25,08,63,417.81</b>	<b>18,85,88,128.20</b>

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.

No independent assessment/evaluation/assurance has been carried out by an external agency.



**2. Provide the following details related to water discharged:**

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To surface water	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) To groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) To seawater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third-parties	931	980
- No treatment	0	0
- With treatment – Treated through ETPs	931	980
(v) Others - Gardening	55,979	56,449
- No treatment	-	-
- With treatment – Treated through ETPs and STPs	55,979	56,449
<b>Total water discharged (in kilolitres)</b>	<b>56,910</b>	<b>57,429</b>

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.

No independent assessment/evaluation/assurance has been carried out by an external agency.

**3. Water withdrawal, consumption and discharge in areas of water stress (in kiloliters):**

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

- (i) Name of the area: Bawal, Dharuhera, Bengaluru
- (ii) Nature of operations: Automotive lighting manufacturer
- (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	-	-
(ii) Groundwater	53,267	53,414
(iii) Third party water	14,291.71	3,576.2
(iv) Seawater/desalinated water	-	-
(v) Others	-	-
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>67,558.71</b>	<b>56,990.2</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>67,558.71</b>	<b>56,990.2</b>

Parameter	FY 2022-23 (Current financial year)	FY 2021-22 (Previous financial year)
<b>Water intensity per rupee of turnover</b> (Water consumed/turnover)	0.0029	0.0033
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	-	-
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into surface water	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(ii) Into groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) Into seawater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iv) Sent to third parties	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(v) Others - Gardening	37,726	34,784
- No treatment		
- With treatment – Treated through ETPs and STPs	37,726	34,784
<b>Total water discharged (in kilolitres)</b>	<b>37,726</b>	<b>34,784</b>

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.

No independent assessment/evaluation/assurance has been carried out by an external agency.

#### 4. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2022-23 (Current Financial Year)	FY 2021-22 (Previous Financial Year)
<b>Total Scope 3 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	Scope-3 emissions are not considered by the Company presently. The Company in the process of laying down the roadmap in the near future.	
<b>Total Scope 3 emissions per rupee of turnover</b>	Metric tonnes of CO <sub>2</sub> equivalent		
<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, as no independent assessment/evaluation/assurance has been carried out by an external agency.

**5. With respect to the ecologically sensitive areas reported at Question 10 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.**

Not applicable, as the Company does not operate in ecologically sensitive areas.

**6. 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 the initiative
1. Installation of Solar Plants	Energy saving through the installation of solar panels at certain plant locations.	In FY 2021-22 and FY 2022-23, the Company consumed 4,85,74,723.36 Mega Joules and 6,37,80,750.00 Mega Joules of electricity respectively, from solar sources.
2. Installation of ETPs and STPs	ETPs and STPs have been installed to treat waste water.	The treated water is re-used for gardening and other non-potable purposes.
3. Tree plantation	As part of Company employee welfare initiative as well as to reduce the carbon emission	The Company has a formal initiative called "Nanhi Chaan" which celebrates the birth of a girl child among its employees by planting a tree. The Company is also doing tree plantation during the visits of its Customers and on the event of World Environment Day etc. These two initiatives together would help the Company towards moving in the direction of reducing its carbon footprints and would also count as a noble activity towards the environment.

**7. 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 Company has Emergency Response Plan, which captures 8 nos. of emergencies to act as to how to handle the situation in case of any emergency and the same is applicable to all the plants, which is also shared with all the employees through our employees app. These are Emergency response plans and procedures for:

- Fire Emergency
- Earthquake Emergency
- Sewage Outflow Emergency
- Medical Emergency - Death Emergency
- Civil Unrest Emergency
- Food Poisoning Emergency
- Snake Bite Emergency
- Gas Leakage Emergency

**8. 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.**

There is no major environmental impact resulting from the Company's value chain (productive suppliers were assessed for this purpose). Since the Company mindful of the environmental consequences across the value chain, its every supplier is required to sign and abide by the Supplier's Code of Conduct. The Suppliers of the Company are expected to adhere to the compulsory Code of Conduct and further attempt to inculcate the principles of the said Code of Conduct in their supply chains.

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

All the Company's productive suppliers were assessed for environmental impacts through a formal evaluation sheet (Supplier Business Capability Evaluation Report) at the time of onboarding and as an annual exercise.

**PRINCIPLE**  
**07**


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 Company is affiliated with 3 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;**


Name of the trade and industry chambers/associations	Reach of trade and industry chambers/associations (State/National)
Automotive Component Manufacturers Association of India, New Delhi	National
Confederation of Indian Industry (CII)	National
Society of Automotive Engineers (SAE)	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.**

Name of authority	Brief of the case	Corrective action taken
 Not applicable, as the Company has not received any adverse orders from any regulatory authorities.		

**Leadership Indicators**

1. **Details of public policy positions advocated by the entity;**

Public policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of review by Board (Annually/half yearly/quarterly/ others – please specify)	Web link, if available
 The Company 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  
**08**

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
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Not applicable, as there were no projects that required SIA based on applicable laws in the current year.

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

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 ₹)
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Not applicable, as there were no projects requiring an R&R.

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

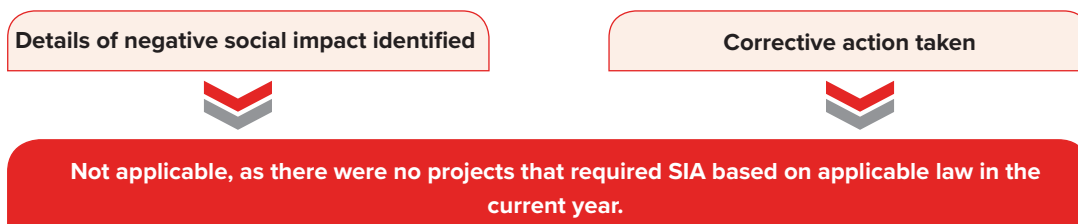
As a matter of policy, the Company undertakes various CSR activities to address the needs of the community in the vicinity of its plants' premises. There is an Open Door Policy at the Company, wherein the communities can approach plant/location and management of that respective plant. The Company also follows the practice of reaching out to communities, including vulnerable groups and redressing their grievances, wherever needed.

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

	FY 2022-23 Current financial year	FY 2021-22 Previous financial year
Directly sourced from MSMEs/small producers	12%	12%
Sourced directly from within the district and neighbouring districts	62%	66%

**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):



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

State	Aspirational district	Amount spent (in ₹)
Haryana	Mewat - Nuh	11,19,007
Uttarakhand	Udham Singh Nagar	13,365

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

No, the Company follows a standardized procurement policy across all suppliers and vendors.

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

Not applicable, as mentioned in Question No. 3(a) above.

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

Not applicable, as mentioned in Question No. 3(a) above.

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:

Intellectual property based on traditional knowledge	Owned/acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
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Not applicable, as the Company does not own or acquire 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
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Not applicable, as mentioned in Question No. 4 above.

**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	Life Skill for Adolescent	1,300 students	100%
	Life Skill for Young Students	200 students	
	Career Counselling	1,300 students	
2	Eye Screening and Free Cataract Surgeries	5 Camps 126 Surgeries	100%
	Juvenile Diabetes Patients	8 patients	
	Cancer Detection Camps	259 Screenings	
3	Girl Child Education	35 Girl Child	100%
4	Personal Hygiene	963	100%





**PRINCIPLE**  
**09**

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 Company is a Tier-1 B2B Company in the Automotive Sector and manufactures and sells its products majorly to large OEMs. The Company ensures timely delivery to all of its OEM customers as per the time schedule specified by them. In case of any complaints, OEM customers can raise their complaints with the Company through the mechanism laid down in the process flow of the Company for the OEMs (Handling of Customer complaint).

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

As a percentage to total turnover

Environmental and social parameters relevant to the product

Safe and responsible usage

Recycling and/or safe disposal

**Not applicable, as the Company is in B2B business, and the products do not reach end customers directly.**

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

	FY 2022-23 (Current financial year)		Remarks	FY 2021-22 (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	-	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	-
Other (from OEMs)	83	0	-	136	0	-

#### 4. Details of instances of product recalls on account of safety issues

	Number	Reasons for recall
Voluntary recalls	Nil	Nil
Forced recalls	Nil	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 Company has a framework/policy on cyber security and risks related to data privacy, which is available on the Company's intranet.

**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.**

Not applicable, as neither any complaints with respect to advertising, delivery of essential services, cyber security and data privacy of customers, re-occurrence of instances of product recalls were received during the reporting period nor any penalties were paid or actions were taken by regulatory authorities on account of the safety of products/services.

### Leadership Indicators

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

The channels/platforms where information on products and services of the entity can be accessed include the following website and social media links:

- <https://www.lumaxworld.in/>
- <https://www.youtube.com/c/LumaxWorld>
- <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 discussed above, since the Company supplies the products directly to the OEMs who further assemble and sell the end products to the end-user customers, the Company has limited role in informing and educating the end-user about the safe and responsible usage of its products.

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

Not applicable, as the Company does not provide essential services.

**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. 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)**

Not applicable, as the Company supplies to OEMs and there is no direct visibility for the end-users.

Furthermore, since customer satisfaction is of utmost importance to the Company, it seeks customer satisfaction by various means. Customers' feedback is obtained directly or indirectly to identify any grievances and accordingly, corrective measures are designed and executed. The summary of customer satisfaction patterns is collated, reviewed and monitored by the management of the Company too.

**5. Provide the following information relating to data breaches:**

**a. Number of instances of data breaches along-with impact**

No instances were identified pertaining to data breach.

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

No data breaches were identified related to personally identifiable information of customers.

