

LIL/SE/CS/REG.34/2024-25

September 04, 2024

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| BSE Limited Listing & Compliance Department Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400001 | National Stock Exchange of India Limited Listing & Compliance Department Exchange Plaza, C-1 Block G, Bandra Kurla Complex, Bandra (E), Mumbai – 400051 |
| Security Code: 517206 | Symbol: LUMAXIND |

Subject: Submission of Business Responsibility and Sustainability Report of Lumax Industries Limited (“the Company”) for the Financial Year 2023-24.

Dear Sir/Ma’am,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, please find enclosed herewith the Business Responsibility and Sustainability Report for the Financial Year 2023-24, which also forms part of the Annual Report for the Financial Year 2023-24 of the Company.

You are requested to kindly take the same in your records.

Thanking you,

Yours faithfully,

For LUMAX INDUSTRIES LIMITED

RAAJESH KUMAR GUPTA
EXECUTIVE DIRECTOR & COMPANY SECRETARY
M.NO. A-8709

Encl: As stated Above

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT



SECTION A GENERAL DISCLOSURES

I. DETAILS OF THE LISTED ENTITY

| | | |
|-----|--|---|
| 1. | Corporate Identity Number (CIN) of the Listed Entity | L74899DL1981PLC012804 |
| 2. | Name of the listed entity | Lumax Industries Limited ('The Company') |
| 3. | Year of incorporation | 1981 |
| 4. | Registered office address | 2 nd Floor, Harbans Bhawan-II Commercial Complex, Nangal Raya, New Delhi - 110 046 |
| 5. | Corporate address | Plot no. 878, Udyog Vihar, Phase V, Gurugram - 122 016, Haryana, India |
| 6. | E-mail | contactbrsr.lil@lumaxmail.com |
| 7. | Telephone | 0124-4760000 |
| 8. | Website | https://www.lumaxworld.in/lumaxindustries |
| 9. | Financial year for which reporting is being done | April 01, 2023 - March 31, 2024 |
| 10. | Name of the Stock Exchange(s) where shares are listed | BSE Limited and National Stock Exchange of India Limited |
| 11. | Paid-up capital | ₹ 9,34,77,320 |
| 12. | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | Mr Raajesh Kumar Gupta Telephone: 0124-4760000 E-mail: contactbrsr.lil@lumaxmail.com |
| 13. | Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together). | The disclosures in this report have been provided on a standalone basis. |
| 14. | Name of assurance provider | Not applicable as per the SEBI Circular No.: No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated July 12, 2023. |
| 15. | Type of assurance obtained | |

II. PRODUCTS/SERVICES

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

| Description of main activity | Description of business activity | % of turnover of the entity |
|------------------------------|--|-----------------------------|
| Manufacturing | Electrical equipment, general purpose and special purpose machinery and equipment, and transport equipment.* | 99.78% |

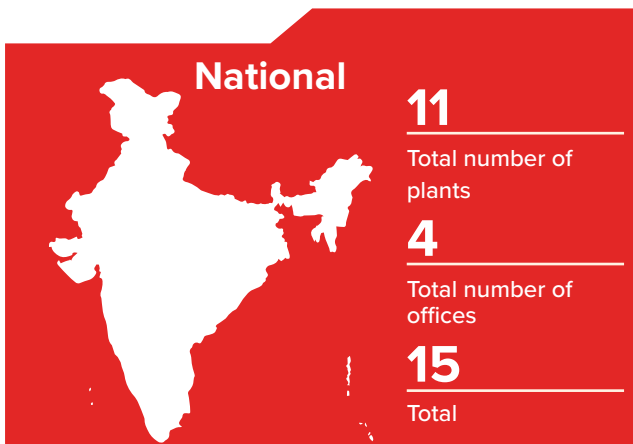
*These details are in line with Form No. MGT-7 prescribed by MCA

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

| Product/service | NIC code | % of total turnover contributed |
|----------------------------|-------------|---------------------------------|
| Automotive lighting | 2740 | 96.37% |

III. OPERATIONS

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



Disclaimer: 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.

19. Markets served by the entity: Domestic & International

a. Number of locations

| Locations | Number |
|-------------------------------------|------------|
| National (No. of states) | 28* |
| International (No. of countries) | 7 |

*Includes Union Territories



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

The Company's exports account for 1.10% of the Company's total turnover.

c. A brief on types of customers

The Company specializes in the automobile lighting industry, offering a comprehensive range of high-quality lighting solutions for four-wheelers, two-wheelers, and commercial vehicles, serving both the Indian and international automotive markets. The Company's primarily conducts its sales through a Business-to-Business (B2B) model, supplying Original Equipment Manufacturers (OEMs). Its prestigious customer base includes notable names such as Maruti Suzuki, Tata Motors, Mahindra & Mahindra, MG Motors, Toyota Kirloskar, Hero MotoCorp, Honda Motors, TVS, and Suzuki Motors.

IV. Employees

20. 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) |
| Employees | | | | | | |
| 1 | Permanent (D) | 1,405 | 1,305 | 92.88% | 100 | 7.12% |
| 2 | Other than permanent (E) | - | - | - | - | - |
| 3 | Total employees (D + E) | 1,405 | 1,305 | 92.88% | 100 | 7.12% |
| Workers | | | | | | |
| 4 | Permanent (F) | 1,350 | 1,240 | 91.85% | 110 | 8.15% |
| 5 | Other than permanent (G) | 4,007 | 3,150 | 78.61% | 857 | 21.39% |
| 6 | Total workers (F + G) | 5,357 | 4,390 | 81.95% | 967 | 18.05% |

b. Differently abled employees and workers:

| S. no. | Particulars | Total (A) | Male | | Female | |
|------------------------------------|--|-----------|---------|---------|---------|---------|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) |
| Differently abled employees | | | | | | |
| 1 | Permanent (D) | - | - | - | - | - |
| 2 | Other than permanent (E) | - | - | - | - | - |
| 3 | Total differently abled employees (D + E) | - | - | - | - | - |
| Differently abled workers | | | | | | |
| 4 | Permanent (F) | - | - | - | - | - |
| 5 | Other than permanent (G) | - | - | - | - | - |
| 6 | Total differently abled workers (F + G) | - | - | - | - | - |

21. Participation/inclusion/representation of women

Board of Directors

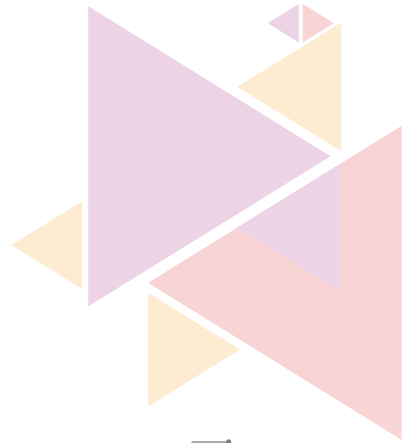
No. and percentage of females

| Total (A) | No. (B) | % (B/A) |
|-----------|---------|---------|
| 12 | 1 | 8.33 |

Key Management Personnel

No. and percentage of females

| Total (A) | No. (B) | % (B/A) |
|-----------|---------|---------|
| 6 | 0 | 0.00 |



22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

| | FY 2023-24 (Turnover rate in current FY) | | | FY 2022-23 (Turnover rate in previous FY) | | | FY 2021-22 (Turnover rate in the year prior to the previous FY) | | |
|----------------------------|---|--------|--------|--|--------|--------|--|--------|--------|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| Permanent employees | 29.61% | 28.89% | 29.56% | 27.88% | 44.00% | 28.86% | 22.98% | 23.38% | 23.01% |
| Permanent workers | 40.49% | 61.71% | 41.94% | 49.39% | 60.00% | 50.22% | 42.63% | 22.22% | 41.18% |

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

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

| Names of the holding/subsidiary/associate companies/joint ventures (A) | SL Lumax Limited | Lumax Industries Czech s.r.o. |
|--|------------------|-------------------------------|
| Indicate whether holding/subsidiary/associate/joint venture | Associate | Wholly owned subsidiary |
| % of shares held by listed entity | 21.28% | 100% |
| Does the entity indicated at column A, participate in the business responsibility initiatives of the listed entity? (Yes/No) | No | No |

VI. CSR DETAILS

24.

| | | |
|---|----------------------------|--------------------------|
| Whether CSR is applicable as per Section 135 of Companies Act, 2013: (Yes/No) | Turnover (in ₹) | Net worth (in ₹) |
| Yes | ₹ 2,63,659.47 Lakhs | ₹ 54,018.46 Lakhs |

VII. Transparency and Disclosures Compliances

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

| Stakeholder group from whom complaint is received | Grievance redressal mechanism in place (Yes/No) (If Yes, then provide web-link for grievance redress policy) | FY 2023-24 Current financial year | | | FY 2022-23 Previous financial year | | |
|---|--|--|--|---------|--|--|---|
| | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks |
| Communities | No | Nil | Nil | - | Nil | Nil | - |
| Investors (other than shareholders) | No | Nil | Nil | - | Nil | Nil | - |
| Shareholders* | Yes | 7 | Nil | - | Nil | Nil | - |
| Employees and workers | Yes | 2 | Nil | - | Nil | Nil | The enquiry on a complaint received on March 25, 2022 was concluded, and the complaint was resolved on November 10, 2022. |
| Customers | Yes | 130 | Nil | - | 94 | Nil | - |
| Value chain partners | No | Nil | Nil | - | Nil | Nil | - |
| Other (please specify) | - | - | - | - | - | - | - |

All complaints were resolved within the respective quarters.

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

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

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


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



Opportunity



Risk

| S. no. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk/opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|--------|---------------------------|--|--|--|--|
| 1. | Waste Management |   | <p>Opportunity</p> <ol style="list-style-type: none"> To enhance operational efficiency and reduce costs. To generate additional revenue streams and improve environmental footprint. <p>Risk</p> <ol style="list-style-type: none"> Initial investments and operational adjustments may temporarily impact profitability and operational efficiency. Overcoming technological barriers requires strategic planning and resource allocation. | <p>Adaptation measures</p> <ol style="list-style-type: none"> Strategic Investment Planning Adaptive Compliance Strategy Technology and Innovation Adoption Continuous Improvement and adaptation. | <p>Positive Implication</p> <p>Implementing robust waste management practices allows the Company to streamline operations, reduce costs, and enhance resource efficiency. This ensures compliance with regulations and strengthens the company's reputation as a responsible corporate citizen. This commitment fosters innovation and new revenue streams through initiatives in recovery and recycling.</p> <p>Negative Implication</p> <p>Upgrading facilities and implementing new waste management technologies can require significant upfront investments. Depending on the complexity of waste types involved, the Company may require specialized knowledge for effective waste management.</p> |
| 2. | Water Management |   | <p>Opportunity</p> <p>Responsible environmental stewardship, corporate sustainability goals.</p> <p>Risk</p> <p>As freshwater sources deplete, their critical role in the Company's operations—such as production and cooling systems—becomes increasingly vital. The risk of water shortages or contamination can severely disrupt operations, making effective water management essential</p> | <p>Adaptation/Mitigation Measures:</p> <ol style="list-style-type: none"> Conduct thorough evaluations to identify potential water-related risks and vulnerabilities within operations. Expanding water-saving equipment and technologies & wastewater treatment facilities. Regular Maintenance and Monitoring Exploring alternative water sources such as rainwater harvesting and greywater reuse to meet operational needs. | <p>Positive Implication</p> <ol style="list-style-type: none"> Implementing efficient water management practices can lead to significant cost savings by reducing water consumption, minimizing wastewater treatment costs, and optimizing operational processes. Helps to mitigate financial risks associated with water scarcity & potential disruptions to operations due to water-related issues. <p>Negative Implications:</p> <p>Water shortages or contamination can halt production processes, leading to costly downtime, delays, and reduced output. Prolonged operational disruptions due to these issues can further elevate expenses.</p> |



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) |
|--------|---------------------------|--|--|--|--|
| 3. | Energy Management | | <p>Opportunity</p> <ol style="list-style-type: none"> To reduce dependency on non-renewable energy sources. To enhance operational resilience, reducing downtime risk. To meet stakeholder expectations and support environmental stewardship. To educate employees and create awareness. <p>Risk</p> <ol style="list-style-type: none"> Dependence on new technologies for energy management may cause reliability issues, maintenance costs, and potential compatibility challenges with existing systems. Initial investments and operational adjustments may temporarily impact profitability. | <p>Adaptation/Mitigation Measures</p> <ol style="list-style-type: none"> Thorough assessment to identify potential risks during the pre-implementation phase. Phased approach & smaller-scale implementations before full-scale deployment. | <p>Positive Implications:</p> <ol style="list-style-type: none"> Effective energy management leads to significant cost savings over time through reduced energy consumption. Commitment to energy efficiency and sustainability strengthens investor, customer, relationships, potentially boosting brand loyalty, and financial performance. Reducing reliance on non-renewable energy helps to avoid energy price volatility and supply disruptions, ensuring stable operational costs. <p>Negative Implications:</p> <p>Upfront investments and Initial costs associated with energy management initiatives can be substantial.</p> |
| 4. | GHG Emissions | | <p>Opportunity</p> <p>Advancing environmental stewardship and achieving corporate sustainability goals.</p> <p>Risk</p> <p>Addressing Scope 3 greenhouse gas (GHG) emissions throughout the value chain, in collaboration with partners, presents significant challenges.</p> | <p>Adaptation/Mitigation Measures:</p> <ol style="list-style-type: none"> Transparent communication and collaboration with suppliers Effective data collection and management system to be in place for comprehensive data gathering from diverse suppliers. Education & training programs to foster a culture of sustainability throughout the supply chain. Regular monitoring and review mechanisms to ensure compliance and continuous improvement. | <p>Positive Implications:</p> <ol style="list-style-type: none"> Calculating Scope 3 emissions leads to potential cost savings and improved operational efficiency within the supply chain. Collaborating with suppliers on sustainability goals can foster stronger partnerships potentially leading to increased trust, and long-term financial benefits. <p>Negative Implications:</p> <ol style="list-style-type: none"> Ensuring the accuracy of Scope 3 emissions data can be costly requiring investments in data collection and management systems. Effectively engaging suppliers in the emissions calculation process may require additional resources & training. |



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) |
|--------|--------------------------------|--|--|--|---|
| 5. | Occupational Health and Safety |   | <p>Opportunity</p> <ol style="list-style-type: none"> To create a safer, more efficient workplace and enhance organizational resilience. To prevent risks and safety incidents. <p>Risk:</p> <ol style="list-style-type: none"> Poor occupational health and safety (OHS) practices can lead to workplace accidents, injuries, and health issues, severely impacting employee well-being and productivity. These incidents not only affect individual employees but can also disrupt operations, halt production, and cause significant delays. | <p>Adaptation/Mitigation Measures:</p> <ol style="list-style-type: none"> Regular training for employees on safety procedures and protocols. Developing emergency response plans to adapt to unexpected incidents Create and enforce comprehensive safety policies. Conduct Regular Safety Audits | <p>Positive Implications :</p> <ol style="list-style-type: none"> Lower accident rates lead to fewer downtime incidents, reducing costs associated with injuries. Improved safety practices can result in reduced insurance premiums leading to direct financial savings. Higher employee morale and retention rates decrease turnover costs. <p>Negative Implications:</p> <ol style="list-style-type: none"> OHS practices, if not implemented effectively can lead to unexpected financial losses (eg. penalties for non-compliance) Maintenance and Upkeep Costs of Safety equipment and facilities. Employee dissatisfaction leads to reduced productivity. |
| 6. | Employee Wellbeing |  | <p>Opportunity</p> <ol style="list-style-type: none"> Improves employee morale, satisfaction, and retention. Enhances employee engagement & motivation and fosters a positive work environment. | - | <p>Positive Implications:</p> <p>Prioritizing employee well-being enhances productivity, and nurtures a positive workplace culture for the Company. This helps in talent attraction, improved productivity, and lower turnover costs, mitigating risks associated with absenteeism. While initial investments and ongoing operational costs are considerations, the long-term financial gains include improved efficiency, lower healthcare expenses, and strengthened stakeholder trust.</p> |
| 7 | Customer Satisfaction |  | <p>Opportunity</p> <ol style="list-style-type: none"> Repeat business and loyalty Customer retention Operational efficiency | - | <p>Positive Implications:</p> <p>Customer satisfaction is pivotal for us, yielding numerous positive outcomes such as repeat business, enhanced loyalty, and streamlined marketing efforts. However, we acknowledge that neglecting customer satisfaction can lead to increased operational costs from handling issues such as complaints and returns. Thus, maintaining high levels of customer satisfaction is always a top priority.</p> |



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) |
|--------|---------------------------|--|---|--|--|
| 8 | DEI | | <p>Opportunity</p> <ol style="list-style-type: none"> 1. A culture of innovation and creativity, leading to new perspectives and ideas that drive product development. 2. Improved customer engagement and market differentiation. <p>Risk</p> <p>Poorly executed DEI efforts may inadvertently create a negative impact on teamwork and collaboration.</p> | <p>Mitigation Measures:</p> <ol style="list-style-type: none"> 1. Impart mandatory training on DEI principles, unconscious bias, and respectful workplace practices for all employees. 2. Develop and communicate clear DEI policies, guidelines, and procedures. | <p>Positive Implications :</p> <ol style="list-style-type: none"> 1. Embracing DEI initiatives brings diverse perspectives and can lead to better problem-solving and product development. 2. A strong DEI focus helps attract and retain a broader range of talent improving overall workforce quality <p>Negative Implications:</p> <ol style="list-style-type: none"> 1. Developing and maintaining DEI programs may require significant investments in training, policy development, and monitoring. 2. Poorly implemented DEI initiatives can backfire, leading to damage to the company's reputation if perceived as insincere or ineffective. |
| 9. | R&D | | <p>Opportunity</p> <p>R&D and innovation are essential for developing superior products and can potentially help create innovative solutions, increase efficiency and reduce environmental impact.</p> | - | <p>Positive Implications:</p> <p>Investing in Research and Development (R&D) is essential for the Company, providing opportunities to innovate products, enhance customer satisfaction, improve cost efficiency, and adopt new technologies. These initiatives position the Company as a progressive and trusted partner for its customers.</p> |
| 10. | CSR | | <p>Opportunity</p> <p>Engaging in Corporate Social Responsibility (CSR) initiatives can help enhance community relations by demonstrating our commitment to responsible corporate citizenship.</p> | - | <p>Positive Implications:</p> <p>Engaging in social responsibility initiatives strengthens the organization's ties with the community, promoting collaboration and mutual prosperity. These efforts have a positive impact on the community, fostering goodwill and deepening loyalty.</p> |
| 11. | Code of Conduct | | <p>Opportunity</p> <p>The Code of Conduct of a business enhances corporate governance and ethical standards, mitigates risks, improves operational efficiency, and strengthens stakeholder relationships.</p> | - | <p>Positive Implications:</p> <p>Establishing and adhering to a robust Code of Conduct enhances the company's reputation as a trustworthy and ethical organization, leading to increased customer loyalty and improved brand perception. Clear guidelines and ethical standards reduce legal risks. Also, a well-defined Code of Conduct fosters a positive work environment.</p> |



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) |
|--------|---------------------------|--|---|---|---|
| 12. | Regulatory Compliance |   | <p>Opportunity: Regulatory compliance is critical for industry's strict safety, environmental, and quality standards. Maintaining regulatory compliance ensures the Company avoids costly fines, penalties, and legal fees associated with non-compliance.</p> <p>Risk: Non-compliance or regulatory violations can damage the Company's reputation, leading to customer distrust along with fees & penalty costs. This can negatively impact revenue and long-term sustainability.</p> | <p>Mitigation Measures</p> <ol style="list-style-type: none"> 1. Compliance monitoring and audits 2. Employee training and awareness 3. Engagement with regulatory authorities 4. Regular risk assessments | <p>Positive Implications:</p> <ol style="list-style-type: none"> 1. Proactively managing regulations minimizes the risk of fines, penalties, and legal issues, safeguarding the company's financial health 2. Commitment to regulatory compliance builds trust with investors, customers, and regulators, strengthening relationships 3. Compliance ensures the company operates legally, providing a solid foundation for sustainable, long-term growth <p>Negative Implications:</p> <ol style="list-style-type: none"> 1. Failing to meet regulations can lead to fines, lawsuits, and financial penalties. 2. Non-compliance can damage the company's reputation and potential revenue loss. |
| 13. | Risk & Crisis Management |  | <p>Opportunity</p> <ol style="list-style-type: none"> 1. To strengthen resilience against potential disruption. 2. Pre-planning and anticipating risks not only mitigates potential threats but also positions the Company as reliable and prepared. | - | <p>Positive Implications :</p> <p>Effective risk and crisis management strategies mitigate financial losses, enhance resilience, lower insurance costs, and bolster investor confidence. Proactive measures like risk assessments, crisis planning, training, and transparent communication ensure readiness, safeguarding reputation and operational continuity.</p> |
| 14. | Data Security |   | <p>Opportunity: A secure data system reduces the risk of cyberattacks, minimizing downtime and maintaining productivity.</p> <p>Risk: Keeping up with evolving standards and continuously monitoring & updating security protocols can be complex and resource intensive.</p> | <p>Mitigation measures:</p> <ol style="list-style-type: none"> 1. To conduct regular security audits and ensure continuous monitoring to detect and address vulnerabilities promptly. 2. To organize training programs to ensure employees are aware of security protocols and can recognize potential threats | <p>Positive Implications:</p> <ol style="list-style-type: none"> 1. Effective data security boosts customer confidence leading to greater loyalty and repeat business. 2. A strong track record in data security improves the company's reputation, strengthening brand credibility. 3. Data security measures enhance overall operational efficiency and reliability <p>Negative Implications:</p> <p>Implementing and maintaining robust data security measures requires continuous investment in technology and can be resource intensive.</p> |



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) |
|--------|---------------------------|--|--|---|--|
| 15. | Sustainable Procurement |   | <p>Opportunity Commitment towards corporate sustainability goals.</p> <p>Risk Ensuring that all suppliers meet sustainability criteria can complicate supply chain management.</p> | <p>Mitigation Measures:</p> <ol style="list-style-type: none"> 1. Improve close relationships with suppliers to ensure alignment on sustainability goals and practices. 2. Provide training and support to suppliers to help them to meet standards. 3. Conduct regular audits of suppliers to ensure compliance with sustainability standards 4. Incorporate sustainability requirements into contracts and Service Level Agreements (SLAs) with clear expectations and consequences for non-compliance | <p>Positive Implications:</p> <ol style="list-style-type: none"> 1. Sustainable procurement improves resource use and reduces waste, boosting overall operational efficiency. 2. Sustainable procurement enhances competitive advantage, potentially increasing profits. <p>Negative Implications:</p> <ol style="list-style-type: none"> 1. Sustainable practices can add complexity to the supply chain, needing more coordination and management. 2. Challenges need strong supplier collaboration, cost control, and technology investments. |
| 16. | Stakeholder Management |  | <p>Opportunity</p> <ol style="list-style-type: none"> 1. Building trust and positive relationships with stakeholders 2. Engaging stakeholders in decision-making processes and addressing their concerns help mitigate risks. | - | <p>Positive Implications:</p> <p>Stakeholder management is crucial for maintaining customer satisfaction, attracting investors, and fostering community relations. By prioritizing effective communication, transparency, and responsiveness to stakeholder needs, the Company can optimize financial performance, mitigate risks, and capitalize on growth opportunities in a competitive market environment.</p> |



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 |
|---|---|-----|-----|-----|-----|-----|-----|-----|-----|
| Policy and management processes | | | | | | | | | |
| 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 | The policies mandated by the Companies Act, 2013, and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, can be accessed on the Company's website: https://www.lumaxworld.in/lumaxindustries/policies.html Other internal policies are available within the Company and are not accessible to the public. | | | | | | | | |
| 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 policies such as Vigil Mechanism/Whistleblower Policy are extended to Company's value chain partners. | | | | | | | | |
| 4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | <ul style="list-style-type: none"> • IATF 16949:2016 (Automotive Quality Management System) • ISO 14001:2015 (Environment Management System) • ISO 45001:2018 (Occupational health and safety management systems) • ISO 27001:2022 (Information security management systems) • ISO 50001:2018 (Energy management) • ESD S20.20:2021 (Protection of Electrical and Electronic Parts) • ISO 9001:2015 (Quality management system (QMS)) | | | | | | | | |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any . | <p>The Company is developing an ESG Roadmap with clear commitments, goals, targets, and identified Environmental and Social KPIs. The following targets were set at the end of FY 2023-24 with a timeline of three years.</p> <ol style="list-style-type: none"> 1. Waste Management as per 3'R 2. Water Neutral 3. To source 100% of energy requirement through Renewable Sources (by FY2027-2028). 4. Zero Fatality 5. Employee survey, Employee redressal mechanism 6. To increase females by 25% in total workforce. 7. Zero Tolerance towards violation of Code of Conduct 8. To implement Customer Satisfaction Survey and score, customer complaints redressal mechanism. 9. 100% mitigation of identified risks 10. Zero data security breaches. 11. 100% adherence to the Sustainable procurement policy. | | | | | | | | |

| Disclosure Questions | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|---|----|----|----|----|----|----|----|----|
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met | The Company has formulated a strategic plan aimed at achieving specific commitments, goals, and targets in the upcoming year. This plan outlines proactive measures and initiatives to be implemented. The Company remains focused on executing the strategy effectively, aiming to achieve desired outcomes and improve its performance in the forthcoming reporting periods. | | | | | | | | |
| Governance, leadership, and oversight | | | | | | | | | |
| 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>) | Lumax's long-term strategy is grounded in ESG principles, which emphasize creating value for stakeholders, including people, communities, and the planet. For Lumax, ESG is about making a meaningful impact rather than merely meeting criteria. The company is dedicated to people, communities, and the planet, and as the leading global provider of automotive lighting, Lumax's mission and core values guide its actions and help it stay focused on what matters most. The Board of Directors has approved a three-year ESG roadmap and strategy. Achievements and objectives related to ESG are detailed in the ESG section of this Annual Report. | | | | | | | | |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies). | For the Financial Year ended March 31, 2024, Mr. Vishnu Johri, CEO was responsible for implementation and overseeing the Business Responsibility Policies. However, subsequent to year end, Mr. Raju Bhauso Ketkale, CEO has been nominated for the said responsibility w.e.f., July 01, 2024. Email: contactbrsr.lil@lumaxmail.com | | | | | | | | |
| 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. | Although a dedicated Board Committee has not been established to handle sustainability-related issues, Mr Raajesh Kumar Gupta, Executive Director & Company Secretary, is entrusted with decision-making on these matters. Name: Mr Raajesh Kumar Gupta Designation: Executive Director DIN: 00988790 Telephone : 0124-4760000 Email: contactbrsr.lil@lumaxmail.com | | | | | | | | |

10. Details of review of NGRBCs by the Company:

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



| | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|
| 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. | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| No, the Company has not carried out any 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**

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 programmes held | Topics/principles covered under the training and its impact | %age of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|--|--|
| Board of Directors | 2 | ESG & Sustainability | 100% |
| Key Managerial Personnel | 2 | Corporate Governance ESG & Sustainability | 100% |
| Employees other than BoD and KMPs | 16 | <ul style="list-style-type: none"> - POSH Awareness - ESG & Sustainability - GHG Accounting (Carbon Emission Assessment) - Technical Updates (Accounting, Auditing & Relevant Regulatory) - Prohibition of Insider Trading & Awareness Session - New Policies & Guidelines - SAP Module Trainings - Fire Safety Training - Budget Meeting-Functional Training - Sessions on Goal Setting - Cyber Security Awareness & Training Program - Quality Function Development (QFD) Awareness Sessions - Low Cost Automation-Supplier Capability Buiding-Training Announcements - Training to Managers on Performance Management System (PMS) - MS Excel Training - Training on ISO 50001 : 2018 | 100% |

| Segment | Total number of training and awareness programmes held | Topics/principles covered under the training and its impact | %age of persons in respective category covered by the awareness programmes |
|---------|--|--|--|
| Workers | 31 | Health and Safety Awareness <ul style="list-style-type: none"> - Health Trainings - Yoga Sessions - Safety Trainings - Fire Trainings Skill Upgradation <ul style="list-style-type: none"> - MS Excel POSH Awareness | 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 INR) | Brief of the case | Has an appeal been preferred? (Yes/No) |
| Penalty/fine | | | Nil | | |
| Settlement | | | Nil | | |
| Compounding fee | | | Nil | | |

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

During FY 2023-24, the Company, its Directors, and Key Managerial Personnel (KMP) did not incur any material (monetary and non-monetary) fines, penalties, punishments, awards, compounding fees, settlement amounts resulting from proceedings by the regulators, law enforcement agencies or judicial institutions.

Note: The materiality threshold specified in Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 has been applied for this disclosure.



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

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

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

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

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

| | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|-----------|--|---|
| Directors | Nil | Nil |
| KMPs | Nil | Nil |
| Employees | Nil | Nil |
| Workers | Nil | Nil |

There were no instances of any disciplinary action taken by law enforcement agencies against Directors, KMP, employees, or workers for charges of bribery or corruption.

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

| | FY 2023-24 (Current financial year) | | FY 2022-23 (Previous financial year) | |
|--|--|---------|---|---------|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of conflict of interest of the Directors | Nil | - | Nil | - |
| Number of complaints received in relation to issues of conflict of interest of the KMPs | Nil | - | Nil | - |

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

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

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

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

| | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|-------------------------------------|--|---|
| Number of days of accounts payables | 149.51 | 135.36 |

9. Open-ness of business:

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

| Parameter | Metrics | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|----------------------------|--|--|---|
| Concentration of purchases | a) Purchases from trading houses as % of total purchases | - | - |
| | b) Number of trading houses where purchases are made from | - | - |
| | c) Purchases from top 10 trading houses as % of total purchases from trading houses | - | - |
| Concentration of sales | a) Sales to dealers/distributors as % of total sales | - | - |
| | b) Number of dealers/distributors to whom sales are made | - | - |
| | c) Sales to top 10 dealers/distributors as % of total sales to dealers/distributors | - | - |
| Share of RPTs in | a) Purchases (Purchases with related parties/Total purchases) | 37.17% | 35.87% |
| | b) Sales (Sales to related parties/Total sales) | 6.44% | 6.26% |
| | c) Loans & advances (Loans & advances given to related parties/Total loans & advances) | 6.96% | 46.21% |
| | d) Investments (Investments in related parties/Total investments made) | 62.73% | 53.77% |

Leadership Indicators

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



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 established processes to manage issues of conflict of interest involving Board members. The Code of Conduct for the Board of Directors and Senior Management outlines their roles and responsibilities, requiring them to act in good faith to promote the Company's business and objectives for the benefit of all members. This Code mandates that they avoid any business, relationships, or activities that could conflict with the Company's interests. In case of a potential conflict of interest, they are required to disclose all pertinent details to the Board of Directors and the Audit Committee.



Essential Indicators

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



2.

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

No, the company is currently assessing options for implementing sustainable sourcing procedures as part of its sustainability initiatives.

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

-

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

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

- (a) Plastics (including packaging)
- (b) E-waste
- (c) Hazardous waste
- (d) other waste.

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

Yes

If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same

EPR regulations apply to the Company's operations across five states-Uttarakhand, Gujarat, Maharashtra, Haryana, and Karnataka. The Company is registered with the Pollution Control Board (PCB) in each state, and all Registration Certificates have been duly issued. The waste collection plan is fully aligned with the EPR plan submitted to the PCB. All 11 plants are registered as brand owners and 9 plants are also registered under Importers Category.

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?

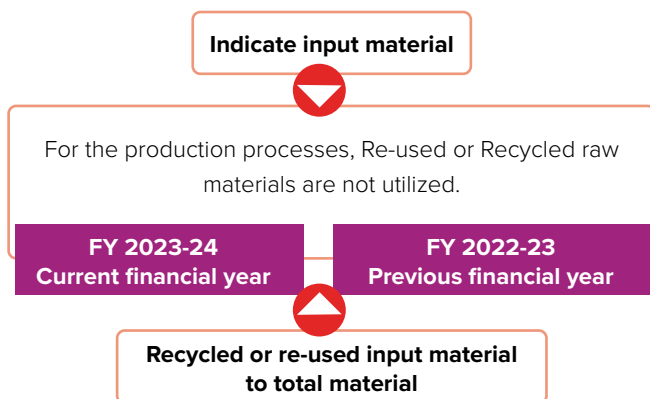
| | |
|--|---|
| NIC code | <p>The Company is currently assessing the feasibility of conducting life cycle assessment (LCA) for its products.</p> |
| Name of product/service | |
| % of total turnover contributed | |
| Boundary for which the Life Cycle Perspective/Assessment was conducted | |
| Whether conducted by independent external agency (Yes/No) | |
| Results communicated in public domain (Yes/No) If yes, provide the web-link. | |

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 |
|---|---------------------------------|--------------|
| <p>During the current financial year, the Company has not conducted LCA for its products.</p> | | |



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 :

| | | | | FY 2023-24 Current financial year | FY 2022-23 Previous financial year | |
|---|---------|-----------------|-------------|--------------------------------------|---------------------------------------|-----------------|
| Plastics (including packaging) | E-waste | Hazardous waste | Other waste | Re-used | Recycled | Safely disposed |
| As a B2B Tier-1 supplier, the Company delivers its products directly to OEM customers and does not engage in end-of-life recovery of the final product as part of its business model. | | | | | | |

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



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) |
| Permanent employees | | | | | | | | | | | |
| Male | 1,305 | 1,305 | 100% | 1,305 | 100% | - | - | 1,305 | 100% | 1,305 | 100% |
| Female | 100 | 100 | 100% | 100 | 100% | 100 | 100% | - | - | 100 | 100% |
| Total | 1,405 | 1,405 | 100% | 1,405 | 100% | 100 | 7.12% | 1,305 | 92.88% | 1,405 | 100% |
| Other than permanent employees | | | | | | | | | | | |
| Male | - | - | - | - | - | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| Total | - | - | - | - | - | - | - | - | - | - | - |

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) |
| Permanent workers | | | | | | | | | | | |
| Male | 1,240 | 483 | 38.95% | 483 | 38.95% | - | - | 483 | 38.95% | - | - |
| Female | 110 | 54 | 49.09% | 54 | 49.09% | 54 | 49.09% | - | - | - | - |
| Total | 1,350 | 537 | 39.78% | 537 | 39.78% | 54 | 4.00% | 483 | 35.78% | - | - |
| Other than permanent workers | | | | | | | | | | | |
| Male | 3,150 | 3,150 | 100% | 3,150 | 100% | - | - | - | - | - | - |
| Female | 857 | 857 | 100% | 857 | 100% | 857 | 100% | - | - | - | - |
| Total | 4,007 | 4,007 | 100% | 4,007 | 100% | 857 | 21.39% | - | - | - | - |

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



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

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

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

3. Accessibility of workplaces.

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

Yes, the premises and offices of the entity are fully accessible to differently abled employees and workers, in accordance with the requirements of the Rights of Persons with Disabilities Act, 2016. The facilities available to these employees include wheelchair ramps, braille signage, accessible restrooms, and digital accessibility, ensuring that information and communication technology is accessible to all and compatible with assistive technology devices.

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 accessible internally within the Company and is not available to the public.

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

| Permanent employees | | ◀ GENDER ▶ | Permanent workers | |
|---------------------|----------------|---------------|---------------------|----------------|
| Return to work rate | Retention rate | | Return to work rate | Retention rate |
| - | - | Male | Not Applicable | Not Applicable |
| 100% | 100% | Female | Not Applicable | Not Applicable |
| 100% | 100% | Total | | |

Note : In the FY 23-24, only permanent female employees 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 | Yes, a Vigil Mechanism/Whistle Blower Policy has been established to receive and address grievances. This policy is accessible to all permanent employees and workers and provides adequate protection against unfair treatment for those who raise concerns. It also allows direct contact with the Chairman of the Audit Committee in appropriate or exceptional cases. Additionally, an Employee App is available which enables easy registration and tracking of grievances. |
| Other than permanent workers | |
| Permanent employees | |
| Other than permanent employees | Not Available |

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

| Category | FY 2023-24 (Current financial year) | | | FY 2022-23 (Previous financial year) | | |
|----------------------------------|--|--|---------------|--|--|---------------|
| | Total employees/workers in respective category (A) | No. of employees/workers in respective category, who are part of association(s) or Union (B) | % (B/A) | Total employees/workers in respective category (C) | No. of employees/workers in respective category, who are part of association(s) or Union (D) | % (D/C) |
| Total permanent employees | 1,405 | - | - | 1,276 | - | - |
| Male | 1,305 | - | - | 1,200 | - | - |
| Female | 100 | - | - | 76 | - | - |
| Total permanent workers | 1,350 | 392 | 29.04% | 1,238 | 401 | 32.39% |
| Male | 1,240 | 390 | 31.45% | 1,147 | 399 | 34.79% |
| Female | 110 | 2 | 1.82% | 91 | 2 | 2.20% |



8. Details of training given to employees and workers:

| Category | FY 2023-24 (Current financial year) | | | | | FY 2022-23* (Previous financial year) | | | | |
|------------------|--|----------------------------------|---------------|-------------------------|-------------|--|----------------------------------|---------------|-------------------------|-------------|
| | Total (A) | On health and safety measures | | On skill upgradation | | Total (D) | On health and safety measures | | On skill upgradation | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| Employees | | | | | | | | | | |
| Male | 1,305 | 810 | 62.07% | 1,305 | 100% | 1,200 | 869 | 72.42% | 1,200 | 100% |
| Female | 100 | 56 | 56.00% | 100 | 100% | 76 | 57 | 75.00% | 76 | 100% |
| Total | 1,405 | 866 | 61.64% | 1,405 | 100% | 1,276 | 926 | 72.57% | 1,276 | 100% |
| Workers | | | | | | | | | | |
| Male | 1,240 | 816 | 65.81% | 1,240 | 100% | 1,147 | 610 | 53.18% | 1,147 | 100% |
| Female | 110 | 90 | 81.82% | 110 | 100% | 91 | 66 | 72.53% | 91 | 100% |
| Total | 1,350 | 906 | 67.11% | 1,350 | 100% | 1,238 | 676 | 54.60% | 1,238 | 100% |

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

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

| FY 2023-24 (Current financial year) | | | Category | FY 2022-23 (Previous financial year) | | |
|--|--------------|-------------|--------------|---|--------------|-------------|
| Total (A) | No. (B) | %(B/A) | | Total (C) | No. (D) | %(D/C) |
| Employees | | | | | | |
| 1,305 | 1,305 | 100% | Male | 1,200 | 1,200 | 100% |
| 100 | 100 | 100% | Female | 76 | 76 | 100% |
| 1,405 | 1,405 | 100% | Total | 1,276 | 1,276 | 100% |
| Workers | | | | | | |
| 1,240 | 1,240 | 100% | Male | 1,147 | 1,147 | 100% |
| 110 | 110 | 100% | Female | 91 | 91 | 100% |
| 1,350 | 1,350 | 100% | Total | 1,238 | 1,238 | 100% |

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 integrated an Occupational Health and Safety Management System as a vital aspect of its operations. The primary goal is to foster a work environment that prioritizes the health and safety of employees while adhering to principles of environmental sustainability. To achieve this, the Company has established comprehensive mechanisms, including the continuous enhancement of environmental occupational health and safety performance, striving for an incident-free work environment, reducing waste to conserve natural resources, ensuring compliance with legal requirements, proper disposal of waste and pollutants, and promoting innovation to prevent pollution, injury, and illness. Furthermore, the Company is ISO 45001 certified, covering 81.82% of its plants, underscoring its commitment to maintaining the highest standards of occupational health and safety throughout its operations.

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

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

- 1. Hazard Identification and Risk Assessment (HIRA):** This process involves a comprehensive evaluation of the work environment and operational tasks to identify potential hazards that could adversely impact employees, visitors, or the surrounding ecosystem. Each identified hazard is assessed to determine its likelihood and potential consequences. Based on this analysis, targeted actions are developed and implemented to effectively mitigate the associated risks.
- 2. Health and Safety Inspections:** This involves a thorough review of the organization's policies, procedures, and practices concerning environmental management, health, and safety. HSE inspections and audits identify areas for improvement to minimize incident risks

and ensure compliance with regulatory obligations and industry standards. Corrective action plans are formulated based on the findings of these audits.

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

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

Yes, the Company has processes for workers to report work-related hazards and to remove themselves from any associated risks.

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

Yes, the Company's employees are provided with Health & Accidental Insurance, which covers a wide range of non-occupational medical and healthcare services



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

| Safety incident/Number | Category* | FY 2023-24 Current financial year | FY 2022-23 Previous financial year |
|---|-----------|--------------------------------------|---------------------------------------|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | Nil | 0.15 |
| | Workers | Nil | 0.15 |
| Total recordable work-related injuries | Employees | Nil | 1 |
| | Workers | Nil | 1 |
| No. of fatalities | Employees | Nil | Nil |
| | Workers | Nil | Nil |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | Nil | Nil |
| | Workers | Nil | Nil |

*Including in the contract workforce

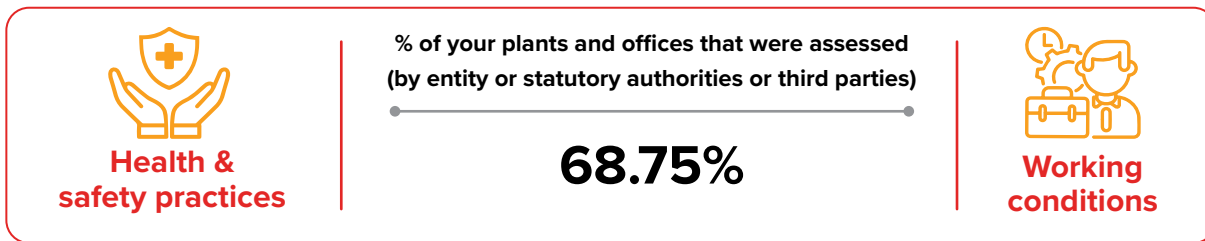
12. Describe the measures taken by the entity to ensure a safe and healthy work place.

The Company prioritizes the health and safety of its employees, recognizing them as its most valuable asset. To maintain a safe and healthy workplace, the Company has implemented several key measures. Notably, 81.8% of its plants hold the ISO 45001 certification, demonstrating its commitment to occupational health and safety standards. To mitigate risks in this regard, daily safety patrols are conducted by the Plant Head, Maintenance Head, and Safety Officers, who identify any unsafe acts or conditions. Regular safety audits are conducted by plant safety officers, and internal safety reviews involve Safety Committee Members, including Process In-Charges, Workers' Committee Members, the Maintenance Head, the Safety Officer, and the Plant Head. Additionally, corporate safety audits are conducted every two months using a comprehensive checklist that covers all processes. Medical rooms are equipped with essential emergency care equipment and medicines to provide prompt medical assistance when needed. Furthermore, the Company organizes extensive safety training programs that cover a wide range of topics to ensure that all employees are well-informed and prepared to maintain a safe working environment.

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

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

14. Assessments for the year:



Note: Assessments were conducted 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.

The Company, conducts periodic internal assessments across all units, implementing corrective and preventive actions in response to audit findings. Based on the findings, the Company undertakes necessary corrective actions, such as enhancing safety protocols, improving equipment maintenance, updating tools, and expanding training programs. The outcomes of these audits, along with the corresponding corrective and preventive actions, are communicated throughout the organization to ensure formal compliance and continuous improvement in safety standards.

Leadership Indicators

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

(A) Employees (Y/N) **Yes** (B) Workers (Y/N) **Yes**

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

The Company's contracts with value chain partners explicitly mandate compliance with all relevant statutory provisions, including payment and deduction of mandatory contributions. Both parties are required to thoroughly review and uphold these clauses. Contractors must provide quarterly proof of the deduction and deposit of statutory dues.

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



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

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

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



5. Details on assessment of value chain partners:

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

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

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



Essential Indicators

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

At the Company, a strong and transparent relationship with investors is prioritized through a deep understanding and consistent alignment with their expectations. The commitment to client value is a fundamental aspect of the corporate philosophy, reflecting dedication to client satisfaction. Employees are recognized as crucial contributors to creating value for both clients and the organization, and efforts are made to provide them with fulfilling career opportunities. Suppliers are viewed as key stakeholders who play an essential role in enabling the delivery of business value. The business practices are centered on inclusive growth, ensuring that the community remains a focal point of sustainable initiatives.

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

- Detailed discussions with the Company’s Legal and Secretarial Department and management to pinpoint key stakeholder groups.
- Stakeholders are identified based on their material influence on the Company or how they are materially affected by the Company’s corporate decisions and their outcomes.
- Stakeholders include customers, suppliers, employees/workers, partners, the Board of Directors, promoters, Regulatory Authorities, government, institutions/industry bodies (such as Banks/NBFC/ACMA/SIAM), CSR entities, and investors, among others.

2. List stakeholder groups identified as key for our Company and the frequency of engagement with each stakeholder group:

- Corporate Announcements
- Social Media
- Reports & disclosures
- Government portals
- Statutory reports
- Email
- Websites
- Newspaper
- Meeting

| 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 | | Need-based | Product-related, price negotiations, and technological advancement, among others |
| Suppliers | No | | Need-based | Product-related, price negotiations, technological advancement etc. |
| Employees/workers | No | | Need-based | Company policies, organizational structure, important developments |
| Partners | No | | Quarterly and need-based | Business-related dealings, technological advancement, new among others |
| Board of Directors | No | | Quarterly and need-based | Financial results, internal controls, limited review and audit reports, among others |
| Promoters | No | | Need-based | Issues requiring decisions, budget, future planning, customer complaints, quality issues, and safety-related concerns, among others. |
| Regulatory Authorities/ Government | No | | As per statutory requirements | Compliance and policy-related matters |



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

Leadership Indicators

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

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

The Company ensures regular and proactive communication with key stakeholders through conference calls, which offer effective explanation of plans and results. This approach supports the concept of shared prosperity and progress for both the Company and society at large, promoting ongoing engagement and active 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.

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

- Compiling a comprehensive list of all potential stakeholders and ESG-related issues pertinent to the Company and the automobile industry, in collaboration with various departments
- Engaging with different stakeholders and the senior management to gather feedback on these topics
- Incorporating this feedback into the Company's policies and activities to enhance alignment and effectiveness

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

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

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

Essential Indicators

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

| Category | FY 2023-24 Current financial year | | | FY 2022-23* Previous financial year | | |
|------------------------|--------------------------------------|--|-------------|--|--|---------------|
| | Total (A) | No. of employees/ workers covered (B) | %(B/A) | Total (C) | No. of employees/ workers covered (D) | %(D/C) |
| Employees | | | | | | |
| Permanent | 1,405 | 1,405 | 100% | 1,276 | 703 | 55.09% |
| Other than permanent | - | - | - | - | - | - |
| Total employees | 1,405 | 1,405 | 100% | 1,276 | 703 | 55.09% |
| Workers | | | | | | |
| Permanent | 1,350 | 1,350 | 100% | 1,238 | 752 | 60.74% |
| Other than permanent | 4,007 | 4,007 | 100% | 3,208 | 3,208 | 100% |
| Total workers | 5,357 | 5,357 | 100% | 4,446 | 3,960 | 89.07% |

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

*FY 2022-23 Other than permanent worker data has been restated.

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

| Category | FY 2023-24 Current financial year | | | | | FY 2022-23* Previous financial year | | | | |
|---------------------------------------|--------------------------------------|--------------------------|---------|---------------------------|---------|--|--------------------------|---------|---------------------------|---------|
| | Total (A) | Equal to minimum wage | | More than minimum wage | | Total (D) | Equal to minimum wage | | More than minimum wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| Permanent employees | | | | | | | | | | |
| Male | 1,305 | - | - | 1,305 | 100% | 1,200 | - | - | 1,200 | 100% |
| Female | 100 | - | - | 100 | 100% | 76 | - | - | 76 | 100% |
| Other than permanent employees | | | | | | | | | | |
| Male | - | - | - | - | - | - | - | - | - | - |
| Female | - | - | - | - | - | - | - | - | - | - |
| Permanent workers | | | | | | | | | | |
| Male | 1,240 | - | - | 1,240 | 100% | 1,147 | - | - | 1,147 | 100% |
| Female | 110 | - | - | 110 | 100% | 91 | - | - | 91 | 100% |

| Category | FY 2023-24 Current financial year | | | | | FY 2022-23* Previous financial year | | | | |
|-------------------------------------|--------------------------------------|-----------------------|---------|------------------------|---------|--|-----------------------|---------|------------------------|---------|
| | Total (A) | Equal to minimum wage | | More than minimum wage | | Total (D) | Equal to minimum wage | | More than minimum wage | |
| | | No. (B) | % (B/A) | No. (C) | % (C/A) | | No. (E) | % (E/D) | No. (F) | % (F/D) |
| Other than permanent workers | | | | | | | | | | |
| Male | 3,150 | 3,150 | 100% | - | - | 2,609 | 2,609 | 100% | - | - |
| Female | 857 | 857 | 100% | - | - | 599 | 599 | 100% | - | - |

Note : *FY 2022-23 Other than permanent worker data has been corrected.

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

a. Median remuneration/wages:

| Male | | | Female | | |
|--------|---|----------------------------------|---|--------|--|
| Number | Median remuneration/salary/wages of respective category | | Median remuneration/salary/wages of respective category | Number | |
| 4* | 70, 65, 118 | Board of Directors (BoD) | 0 | 0 | |
| 6** | 1,00,44,888 | Key Managerial Personnel | 0 | 0 | |
| 1,305 | 6,00,708 | Employees other than BoD and KMP | 4,07,688 | 100 | |
| 1,240 | 2,59,572 | Workers | 2,29,800 | 110 | |

* As at March 31, 2024

** As at March 31, 2024 (including Board of Directors)

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

| FY 2023-24 Current financial year | Gross wages paid to females as % of total wages | FY 2022-23 Previous financial year |
|--------------------------------------|--|---------------------------------------|
| 13.43% | | 13.66% |

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 comprehensive Human Rights Policy that provides employees with a clear process for addressing their complaints or grievances with the Human Resource department or Senior Management. The Corporate HR Head is tasked with managing human rights impacts or issues arising from the actions of employees and workers. Furthermore, each Department Head is accountable for addressing human rights concerns or issues within their specific business areas. The senior management regularly reviews the Human Rights Policy to ensure its effectiveness across the organization.

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

The Company is committed to upholding human rights as a core principle of fair and ethical business practices. Internal systems were established to address human rights concerns, including a POSH Policy to prevent and address workplace harassment, a Grievance Redressal Policy to resolve employee concerns, and a Vigil Mechanism/Whistle Blower Policy that allows the reporting of misconduct without fear. Additionally, an Employee App is available that enables employees to easily register and track their grievances.

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

| | FY 2023-24 Current financial year | | | FY 2022-23 Previous financial year | | |
|-----------------------------------|-----------------------------------|---------------------------------------|--------------------------------|------------------------------------|---------------------------------------|--|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Sexual harassment | 2 | Nil | Cases were reviewed and closed | Nil | Nil | The enquiry was concluded on the complaint which was received on March 25, 2022. This complaint was disposed off on November 10, 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. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

| | FY 2023-24 Current financial year | FY 2022-23 Previous financial year |
|---|-----------------------------------|------------------------------------|
| Total complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 2 | Nil |
| Complaints on POSH as a % of female employees/workers | 0.18% | - |
| Complaints on POSH upheld | - | - |

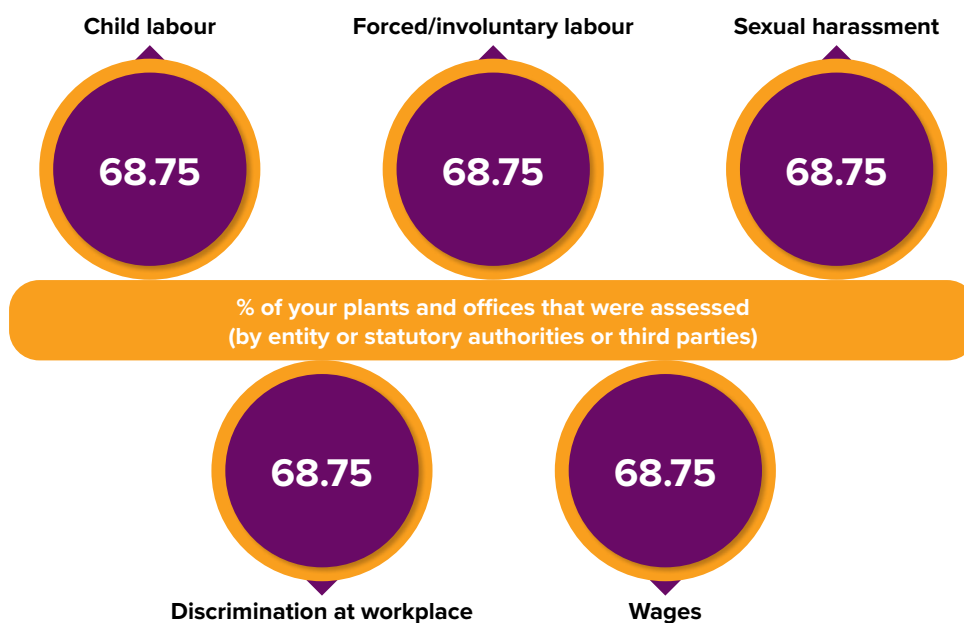
8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

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

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

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

10. Assessments for the year:



Note: Assessments were conducted Internally by the company.

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

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



Leadership Indicators

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

During the year, there were no notable grievances concerning human rights. As part of its standard procedures, the Company consistently upholds human rights principles through the Code of Conduct and other policies. Regular training sessions are conducted for employees and workers, and policies like the Code of Conduct are periodically updated based on emerging risks and feedback received.

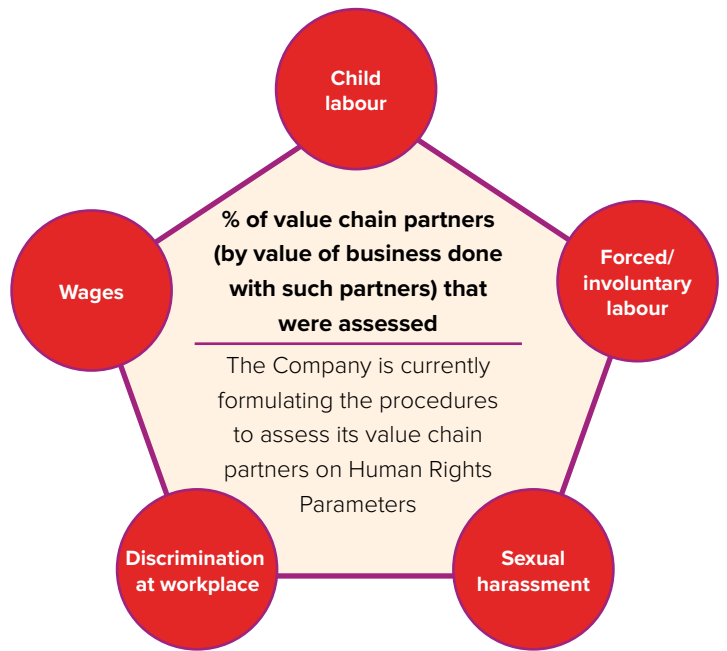
2. Details of the scope and coverage of any Human rights due diligence conducted.

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

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

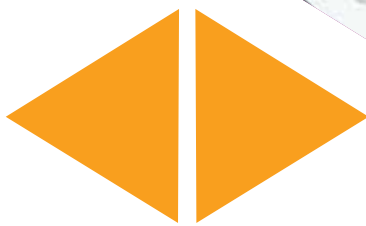
Yes, the Company's premises and offices are accessible to differently-abled visitors in accordance with the Rights of Persons with Disabilities Act, 2016. The facilities include wheelchair ramps, braille signage, accessible restrooms, and digital accessibility features to ensure that information and communication technology is available to all and compatible with assistive technology devices.

4. Details on assessment of value chain partner:



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

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



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

| Parameter | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|---|--|---|
| From renewable sources | | |
| Total electricity consumption (A) (Mega Joules) | 4,38,97,514.40 | 6,37,80,750.00 |
| Total fuel consumption (B) (Mega Joules) | - | - |
| Energy consumption through other sources (C) (Mega Joules) | - | - |
| Total energy consumption from renewable sources (A+B+C) (Mega Joules) | 4,38,97,514.40 | 6,37,80,750.00 |
| From non-renewable sources | | |
| Total electricity consumption (D) (Mega Joules) | 24,49,24,534.80 | 24,02,93,701.81 |
| Total fuel consumption (E) (Mega Joules) | 1,51,63,526.79 | 1,05,69,716.00 |
| Energy consumption through other sources (F) (Mega Joules) | - | - |
| Total energy consumption from non-renewable sources (D+E+F) (Mega Joules) | 26,00,88,061.59 | 25,08,63,417.81 |
| Total energy consumed (A+B+C+D+E+F) | 30,39,85,575.99 | 31,46,44,167.81 |
| Energy intensity per rupee of turnover (Total energy consumption/turnover in lakh rupees- Mega Joules/Lakh INR) | 1,152.95 | 1,356.50 |
| Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP- Mega Joules/Lakh INR) | 1,152.95 | 1,356.50 |
| Energy intensity in terms of physical output (Mega Joules/ Nos) | 5.41 | 6.24 |
| Energy intensity (optional) – the relevant metric may be selected by the entity | | |
| Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No | | |

- 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.**

The Company does not have any sites/facilities identified as designated consumers (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 2023-24 (Current financial year) | FY 2022-23* (Previous financial year) |
|--|--|--|
| Water withdrawal by source (in kilo litres) | | |
| (i) Surface water | 21,622.00 | 27,683.00 |
| (ii) Groundwater | 58,650.60 | 85,532.00 |
| (iii) Third party water | 53,157.76 | 62,911.00 |
| (iv) Seawater/desalinated water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 1,33,430.36 | 1,76,126.00 |
| Total volume of water consumption (in kilolitres) | 1,21,224.36 | 1,75,195.00 |
| Water intensity per rupee of turnover (Water consumed/Turnover in rupee kL/Lakh INR) | 0.46 | 0.76 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP- kL/Lakh INR) | 0.46 | 0.76 |
| Water intensity in terms of physical output kL/Nos | 0.0022 | 0.0035 |
| Water intensity (optional) – the relevant metric may be selected by the entity | | |
| Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. - No | | |

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

4. Provide the following details related to water discharged:

| Parameter | FY 2023-24 (Current financial year) | FY 2022-23* (Previous financial year) |
|--|--|--|
| Water discharged by destination and level of treatment (in kilo litres) | | |
| (i) To Surface water | - | - |
| a. No treatment | - | - |
| b. With treatment – please specify level of treatment | - | - |
| (ii) To Groundwater | - | - |
| a. No treatment | - | - |
| b. With treatment – please specify level of treatment | - | - |
| (iii) To Seawater | - | - |
| a. No treatment | - | - |
| b. With treatment – please specify level of treatment | - | - |
| (iv) Sent to third-parties | 12,206 | 931 |
| a. No treatment | - | - |
| b. With treatment – Treated through ETPs | 12,206 | 931 |
| (v) Others | - | - |
| a. No treatment | - | - |
| b. With treatment – Treated through ETPs and STPs | - | - |
| Total volume of water discharged (in kilolitres) (i + ii + iii + iv + v) | 12,206 | 931 |
| Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. - No | | |

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

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

The Company has established Effluent Treatment Plants (ETPs) and Sewage Treatment Plants (STPs) at all facilities, wherever required. The treated water from these facilities is recycled for purposes such as gardening and other non-potable applications. Moreover, the Company promotes water conservation through rainwater harvesting at most of its plant locations.

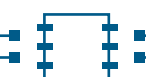
6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format.

| Parameter | Please specify unit | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|-------------------------------------|---------------------|--|---|
| NOx | Kg | 381.57 | Value calculated for FY 2023-24 only |
| SOx | Kg | 40.24 | |
| Particulate matter (PM) | Kg | 132.06 | |
| Persistent organic pollutants (POP) | - | - | |
| Volatile organic compounds (VOC) | - | - | |
| Hazardous air pollutants (HAP) | - | - | |
| Others – please specify | - | - | |

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

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

| Parameter | unit | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|---|--|--|---|
| Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tons of CO ₂ equivalent | 1,220.75 | Value calculated for FY 2023-24 only |
| Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tons of CO ₂ equivalent | 52,406.24 | |
| Total Scope 1 and Scope 2 emission | Metric tons of CO ₂ equivalent | 53,626.99 | |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted | Metric tons of CO ₂ equivalent/₹ Lakh | 0.203 | |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/ Revenue from operations adjusted for PPP) | Metric tons of CO ₂ equivalent/₹ Lakh | 0.203 | |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output | Metric tons of CO ₂ equivalent/Nos | 0.0010 | |



| Parameter | unit | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|--|------|--|---|
| Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity | - | - | - |
| Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. | | | |
| No | | | |

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

The Company has implemented a variety of energy-saving projects aimed at increasing efficiency and reducing greenhouse gas emissions across its operations.:

1. Compressor and Motor Upgrades:

- Replacing outdated, inefficient compressors and motors with energy efficient models, including IE3, IE4 grade motors and EC motors

2. Heating and Cooling Enhancements:

- Installing infrared (IR) heaters and replacing old heaters with energy efficient alternatives such as coil heaters and DP heaters
- Implementing VFD (Variable Frequency Drive) systems on ovens, cooling towers, and conveyors to optimize energy use
- Upgrading to energy-efficient air washers and inverter-based or 5-star rated air conditioner models

3. Lighting and Electrical Efficiency:

- Replacing mercury street lights with solar street lights and optimizing indoor lighting using LES (Light Energy Saver) technology.
- Installing motion sensors in washrooms, meeting rooms, and gangways for automatic light control
- Upgrading old ceiling fans to BLDC fans for higher efficiency

4. Automation and Control Systems:

- Installing solenoid valves and auto drain valves to reduce air leakage and unnecessary air draw during no-load conditions
- Utilizing real-time power factor correction systems and online energy monitoring systems for better energy management

5. Air Management:

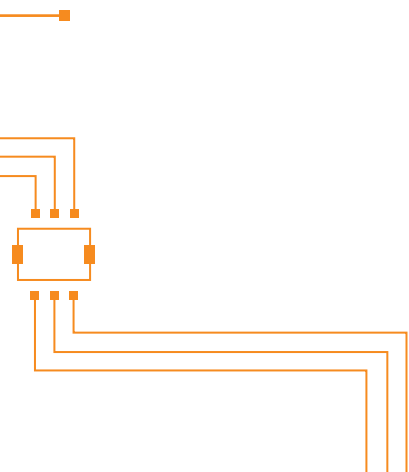
- Conducting air leakage identification and implementing counter measures
- Installing cyclic timers and pressure switches on air conditioners to optimize operation
- Adding air pressure vessels to improve air system efficiency

6. Renewable Energy and Sustainable Practices:

- Installing rooftop solar plants at existing facilities

7. Miscellaneous Improvements:

- Utilizing VFD panels in powder coating booths and STP systems
- Introducing descaling machines for the molding area and metallizing pumping groups
- Installing servo motors in various machines to boost efficiency



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

| Parameter | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|--|--|---|
| Total waste generated (in metric tonnes) | | |
| Plastic waste (A) | 1,384.51 | 993.40 |
| E-waste (B) | 20.10 | 40.90 |
| Bio-medical waste (C) | 0.07 | 0.03 |
| Construction and demolition waste (D) | - | 1.80 |
| Battery waste (E) | 33.43 | 1.40 |
| Radioactive waste (F) | - | - |
| Other hazardous waste. Please specify, if any. (G) (BMC Waste/scrap, Paint Sludge, Discarded Containers, Oil-Soaked Materials/cotton, Used DG set oil ETP Sludge, Hydraulic Oil, Used Oil Sludge, Contaminated Cotton Waste) | 762.98 | 313.40 |
| Other non-hazardous waste generated (H) . Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) (Wooden Scrap, Used Corrugated Boxes Scrap, Iron/Steel/Aluminium/Copper Scrap, Broken Glass, Paper Waste, Discarded Broken Plastic Bins Carton boxes, Foam Cover) | 725.68 | 701.70 |
| Total (A + B + C + D + E + F + G + H) | 2,926.76 | 2,052.60 |
| Waste intensity per rupee of turnover (Total waste generated/Revenue from operations) MT/INR lakh | 0.0111 | 0.0088 |
| Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/Revenue from operations adjusted for PPP) MT/INR lakh | 0.0111 | 0.0088 |
| Waste intensity in terms of physical output MT/Nos | 0.00005 | 0.00004 |
| Waste intensity (optional) – the relevant metric may be selected by the entity | - | - |
| For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes) | | |
| Category of waste | | |
| (i) Recycled | 1,605.53 | - |
| (ii) Re-used | 29.94 | 31.60 |
| (iii) Other recovery operations | 45.10 | 155.20 |
| Total | 1,680.57 | 186.80 |
| For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes) | | |
| Category of waste | | |
| (i) Incineration | 441.02 | 0.02 |
| (ii) Landfilling | - | 0.00 |
| (iii) Other disposal operations | 742.01 | 1,865.80 |
| Total | 1,183.03 | 1,865.82 |

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

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

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

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

| | |
|---|--|
| Location of operations/offices | The Company does not operate in or around ecologically sensitive areas where environmental approvals or clearances are required. |
| 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 | |
| Corrective action taken, if any | |

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

| | |
|--|--|
| Name and brief details of project | The Company did not undertake any EIA-required projects during the current financial year. |
| EIA notification no. | |
| Date | |
| Whether conducted by independent external agency (Yes/No) | |
| Results communicated in public domain (Yes/No) | |
| Relevant web link | |

13. 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:

| | |
|--|---|
| Specify the law/regulation/guidelines which was not complied with | Yes, the Company fully complies with all applicable environmental laws, regulations, and guidelines in India. This includes adherence to the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, and the Environment Protection Act, along with associated rules and regulations. |
| 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 | |
| Corrective action taken, if any | |



Leadership Indicators

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

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

| Parameter | FY 2023-24 (Current financial year) | FY 2022-23* (Previous financial year) |
|---|--|--|
| Water withdrawal by source (in kilo litres) | | |
| (i) Surface water | - | - |
| (ii) Groundwater | 47,934.60 | 53,267.00 |
| (iii) Third party water | 13,533.56 | 14,291.71 |
| (iv) Seawater/desalinated water | - | - |
| (v) Others | - | - |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | 61,468.16 | 67,558.71 |
| Total volume of water consumption (in kilolitres) | 61,468.16 | 67,558.71 |
| Water intensity per rupee of turnover (Water consumed/Turnover) kL/ Lakh INR | 0.23 | 0.29 |
| Water intensity in terms of physical output kL/Nos | 0.00109 | 0.00134 |
| Water discharged by destination and level of treatment (in kilo litres) | | |
| (i) Into Surface water | - | - |
| a. No treatment | - | - |
| b. With treatment – please specify level of treatment | - | - |
| (ii) Into Groundwater | - | - |
| a. No treatment | - | - |
| b. With treatment – STP | - | - |
| (iii) Into Seawater | - | - |
| a. No treatment | - | - |
| b. With treatment – please specify level of treatment | - | - |
| (iv) Sent to third-parties | - | - |
| a. No treatment | - | - |
| b. With treatment – please specify level of treatment | - | - |
| (v) Others | - | - |
| a. No treatment | - | - |
| b. With treatment – please specify level of treatment | - | - |
| Total volume of water discharged (in kilolitres) (i + ii + iii + iv + v) | - | - |

Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No

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

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

| Parameter | unit | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|---|---|--|---|
| Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available) | Metric tonnes of CO ₂ 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. | |
| Total Scope 3 emissions per rupee of turnover | | | |
| Total Scope 3 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 | | | |

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

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

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

| Sr. no | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of Initiative |
|--------|-----------------------|---|---|
| 1 | Energy Management | <ul style="list-style-type: none"> Compressor and Motor Upgrades: Heating and Cooling Enhancements: Lighting and Electrical Efficiency: Automation and Control Systems: Air Management: Renewable Energy and Sustainable Practices: | Reduction of greenhouse gas emissions and reduction of energy consumption |
| 2 | Water Management | <ul style="list-style-type: none"> ETP & STP capacity enhanced in Maharashtra region plants to optimize the water usage | Recycle, reuse of waste water for operational and gardening purpose |



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

As part of its business continuity and disaster management strategy, the Company has Emergency Response Plan that addresses 8 types. of emergencies. This plan outlines the procedures to follow in various emergency situations and is applicable across all plants. It is also communicated to all employees through the Employee App. These Emergency Response Plan includes protocols for:

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

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

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

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

-



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**

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

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.**

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

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.

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 |
|---|----------------------|----------------------|---|--|-------------------|
| Eye Care and Free Cataract Surgeries: The objective of this project is to provide accessible and affordable eye care services to underserved populations. It focuses on addressing the high prevalence of cataracts and refractive errors, which are the leading causes of blindness and vision impairment among the elderly population in India. | - | - | Yes | No | - |
| Life Skills: The objective is to enrich students' educational experiences by providing comprehensive learning beyond academic subjects. This includes developing skills in mathematics, engineering, and science through STEAM classes, and fostering life skills and positive attitudes. Additionally, adaptability for leading a successful life in an ever-evolving environment is encouraged through personality development and soft skills sessions. | - | - | Yes | No | - |

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

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 (InINR) |
|--|-------|----------|---|--------------------------|--|
| The Company did not undertake any projects requiring Rehabilitation and Resettlement (R&R) activities during the current financial year. | | | | | |

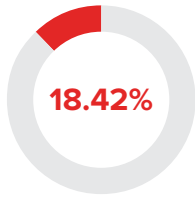
3. Describe the mechanisms to receive and redress grievances of the community.

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

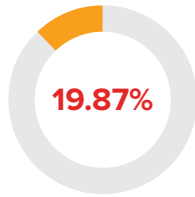
4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

Directly sourced from MSMEs/small producers

FY 2023-24
(Current financial year)



FY 2022-23*
(Previous financial year)

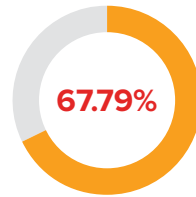


Directly from within India

FY 2023-24
(Current financial year)



FY 2022-23*
(Previous financial year)



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

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

| Location | FY 2023-24 (Current financial year) | FY 2022-23 (Previous financial year) |
|--------------|-------------------------------------|--------------------------------------|
| Rural | 30.86% | 26.36% |
| Semi-urban | 17.66% | 19.99% |
| Urban | 51.47% | 53.65% |
| Metropolitan | - | - |

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



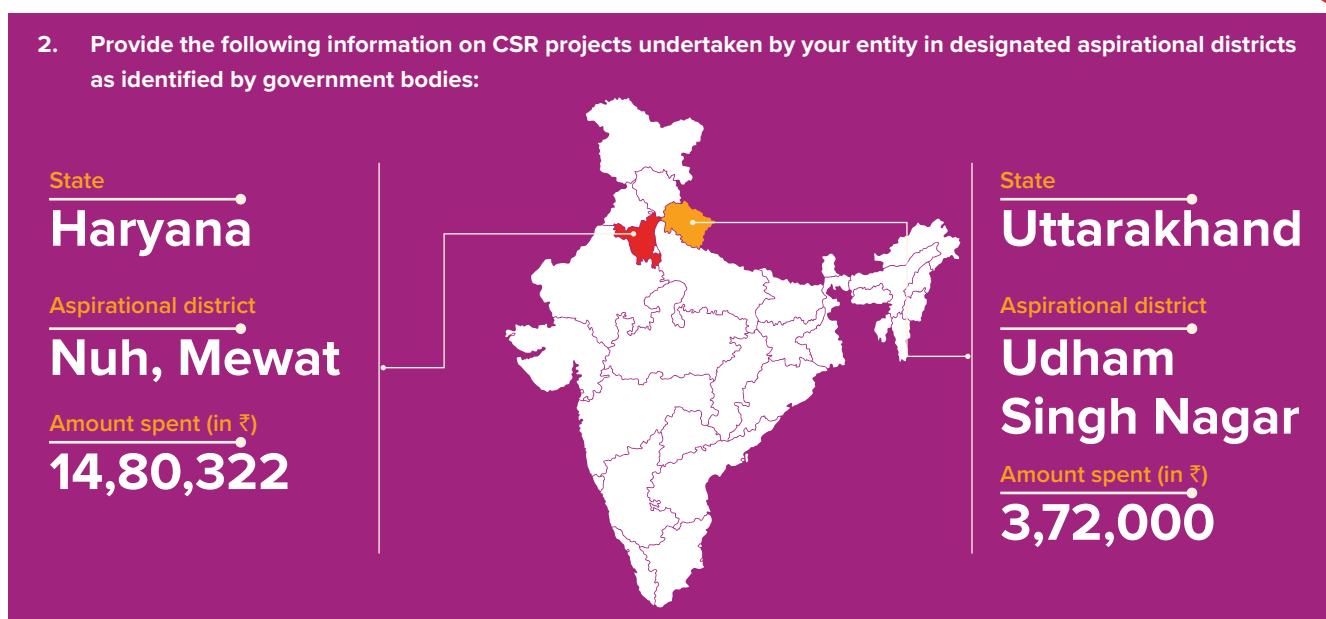


Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the social impact assessments (Reference: Question 1 of Essential Indicators above):

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

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



Disclaimer: 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.

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

No, as per the Company policy, discrimination is not practiced in supplier selection, ensuring equal opportunities for all potential suppliers. The Company actively encourages working with local suppliers or those near its facilities, though it has not specifically included marginalized or vulnerable groups in the supplier qualification criteria.

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

Not Applicable

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

Not Applicable

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 | The Company does not own or have acquired any such intellectual properties. |
| Owned/acquired (Yes/No) | |
| Benefit shared (Yes/No) | |
| Basis of calculating benefit share | |

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

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

6. Details of beneficiaries of CSR projects:

| S. No. | CSR Project | No. of persons benefitted from CSR projects | % of beneficiaries from vulnerable and marginalized groups |
|--------|---|---|--|
| 1 | "Sunehra Kal" - Life Skill | 2,600 | 90% |
| 2 | Career Counselling | 2,600 | 90% |
| 3 | "Usha Ki kiran" Scholarship | 240 direct & 5000+ in-direct | 90% |
| 4 | Infrastruture Support | 500+ | 90% |
| 5 | Cancer Awareness and Screening Camps | 473 | 90% |
| 6 | Eye Screening and Free cataract Surgeries | 167 | 95% |
| 7 | Juvenile Diabetes | 15 | 95% |



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 organization prioritizes customer complaints and is committed to addressing them promptly and effectively. Customers can submit complaints or feedback through various channels, including Customer Portals and E-mail. Each of the 11 plants follows a structured process for managing these complaints: feedback is received via the designated channels, and a temporary resolution is provided within 24 hours. The organization then conducts root cause analysis, and utilizes quality tools to resolve the issue. A permanent countermeasure is implemented within one week and communicated to the customer to ensure thorough resolution.

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

Environmental and social parameters relevant to the product

Safe and responsible usage

Recycling and/or safe disposal

As a percentage to total turnover

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 2023-24 (Current financial year) | | Remarks | FY 2022-23 (Previous financial year) | | Remarks |
|--------------------------------|--|-----------------------------------|---------|---|-----------------------------------|---------|
| | Received during the year | Pending resolution at end of year | | Received during the year | Pending resolution at end of year | |
| Data privacy | Nil | Nil | - | 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 (OEMs) | 130 | Nil | - | 94 | Nil | - |

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

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



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

Yes, the Company has a data privacy policy 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

The Company has not encountered any complaints, issues, or penalties related to advertising, delivery of essential services, cyber security, data privacy, product recalls, or product/service safety. As a result, corrective actions have not been necessary.

7. Provide the following information relating to data breaches:

| | |
|---|--|
| a. Number of instances of data breaches | Nil |
| b. Percentage of data breaches involving personally identifiable information of customers | There were no such instances of data breaches identified so far. |
| c. Impact, if any, of the data breaches | |

Leadership Indicators

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

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

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

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

The Company supplies the products directly to the OEMs who further assemble and sell the end products to the end-user customers. Hence, it has a 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.

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

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/no/not applicable)

Yes

If yes, provide details in brief.

Based on customer's requirement certain products carry CE marking

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

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