

Annexure-C

BUSINESS RESPONSIBILITY (BR) REPORT

Section A: General Information about the Company

Sr. No.	Particulars	Information
1.	Corporate Identity Number (CIN) of the Company	L23203MH2008PLC267060
2.	Name of the Company	Gulf Oil Lubricants India Limited
3.	Registered address	IN Centre, 49/50, M.I.D.C., 12th Road, Andheri (East), Mumbai, MH 400093.
4.	Website	www.gulfoilindia.com
5.	E-mail id	secretarial@gulfoil.co.in
6.	Financial Year reported	April 1, 2018 to March 31, 2019
7.	Sector(s) that the Company is engaged in (industrial activity code-wise)	Manufacturing and selling automotive and non-automotive lubricating oil, greases and two wheeler batteries. (NIC Code: 19201)
8.	List three key products/services that in the Company manufactures/provides (as in balance sheet)	Manufacturing and selling of automotive and non-automotive lubricating oil, greases and two wheeler batteries.
9.	Total number of locations where business activity is undertaken by the Company	<ul style="list-style-type: none"> Number of International Locations (Provide details of major 5): The Company does not have any office in International locations however, products are being exported to Bangladesh, Indonesia, Nepal, Qatar, Africa and other geographies. Number of National Locations: the Management operates from the Company's Head Office and Registered Office which is located in Mumbai, Maharashtra. Apart from this, there are four regional offices and 33 depots to cater pan India operations.
10.	Markets served by the Company – Local/State/ National/ International	The Company's manufacturing plant is located in Silvassa and Ennore, Chennai.

Section B: Financial Details of the Company

Sr. No.	Particulars	Information
1.	Paid up Capital (INR)	₹ 995.95 Lakhs
2.	Total Turnover (INR)	₹ 1,70,579.63 Lakhs
3.	Total profit after taxes (INR)	₹ 17,778.23 Lakhs
4.	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	The Company has spent ₹ 281.53 lakhs being 1.46% of average net profit of last three financial years towards CSR activities in current reporting year.
5.	List of activities in which expenditure in 4 above has been incurred:-	<p>The Company has undertaken multi-year projects during the financial year 2018-19 for supporting following CSR object.</p> <ul style="list-style-type: none"> Promoting water conservation and safe drinking water ATM Promoting education including vocational skill development. Promoting Healthcare. Promoting road safety awareness. Promoting woman safety and education for children (please refer Annexure A to the Board's Report for detailed information).

Section C: Other Details

Does the Company have any Subsidiary Company/ Companies?

No.

Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent Company? If yes, then indicate the number of such subsidiary Company(s)

Not Applicable

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

The Code of Conduct is applicable to all the business entities who do business with the Company. The business associates however do not directly participate in Business Responsibility initiatives of the Company.

Section D: BR Information

Details of Director/Directors and BR head responsible for BR

Details of the Director and BR head responsible for implementation of the BR policy/policies

Particulars	Details
DIN Number	02808474
Name	Mr. Ravi Chawla
Designation	Managing Director
Telephone Number	91-22-6648-7777
E-mail ID	secretarial@gulfoil.co.in

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

The principles are as follows:

Principle 1 (P1)	Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.
Principle 2 (P2)	Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
Principle 3 (P3)	Businesses should promote the well-being of all employees.
Principle 4 (P4)	Businesses should respect the interest of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
Principle 5 (P5)	Businesses should respect and promote human rights.
Principle 6 (P6)	Businesses should respect, protect and make efforts to restore environment.
Principle 7 (P7)	Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.
Principle 8 (P8)	Businesses should support inclusive growth and equitable development.
Principle 9 (P9)	Businesses should engage with and provide value to their customers and consumers in a responsible manner.

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

Sr. No.	Questions No.	P1	P2	P3	P4	P5	P6	P7	P8	P9
		Business Ethics	Sustainability	Employees' well being	Stakeholders Welfare	Human Rights	Environment	Regulatory Policy	Equitable Development	Customer Responsibility
1	Do you have a policy/ policies for	Yes								
2	Has the policy being formulated in consultation with the relevant stakeholders?	Yes								
3	Does the policy conform to any national/ international standards? If yes, specify? (50 words)	The Policies/Code of conduct of the Company are aligned with Global best practices. The Company is an ISO 9001 (QMS), ISO14001 (EMS), TS 16949:2009 & ISO 18001 (OHSAS) compliant.								
4	Has the policy being approved by the Board? If yes, has it been signed by MD/ Owner/ CEO/ appropriate Board Director?	Yes								
5	Does the Company have a specified Committee of the implementation and adherence to the Code of Conduct for Board/ Director/ Official to oversee the implementation of employees and EHS policy are overseen by the BR Head	The implementation and adherence to the code of conduct and EHS policy are overseen by the BR Head								
6	Indicate the link for the policy to be viewed online?	P1 Ref. \$	P2 Ref #	P3 Ref \$	P4 Ref*	P5 Ref \$	P6 Ref \$	P7 Ref \$	P8 Ref \$	P9 Ref \$
		# Environment policy: http://www.gulfoilindia.com/about-us/safety-health-environmental-care/* CSR policy link: http://www.gulfoilindia.com/about-us/corporate-social-responsibility/make-wish-foundation/\$ published on intranet portal								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes, as applicable.								
8	Does the Company have in house structure to implement the policy/ policies?	Yes								
9	Does the Company have a grievance redressal mechanism related to the policy/ policies?	Yes								
10	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	Being initial period of implementation of Business Responsibility Reporting, audit/evaluation is not done. The same shall be undertaken in coming years.								

If answer to the question at serial number 1 against any principle, is 'No', please explain why: Not applicable.

Governance related to BR

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

The Board of Directors of the Company assesses various initiatives forming part of the BR performance of the Company annually.

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

Business Responsibility Report is published by the Company annually and is part of Annual Report.

The hyperlink to view the said Report is: <http://www.gulfoilindia.com/investors/investor-information/investor-disclosures/>. The Company do not publish Sustainability Report.

Section E: Principle-Wise Performance**Principle 1**

The Company is committed to adhere to the highest standards of ethical, moral and legal principles for the purpose of ensuring efficiency in the conduct of its business operations in a fair and transparent manner. The Company has adopted the code of conduct which lays down the general principles and standards that should govern the actions of the Company and its employees and lays emphasis on adoption of the highest standards of personal ethics, integrity, confidentiality and discipline in dealing with matters relating to the Company, which are covered in all our dealings with any stake holders viz., suppliers, customers etc.

The code of conduct communicates the desired standards of behaviour expected from all employees such as compliance with law, dealing with gifts, bribes, equal opportunities, action against sexual harassment, concurrent employment, generic behavioural standards, work specific behavioural standards, maintain confidentiality and information security, procedure for disciplinary process. The code of conduct is signed by all employees on joining the Company.

The Company also has a robust Vigil Mechanism/whistle blower policy for Directors and Employees to report to the management instances of unethical behaviour, actual or suspected fraud, transgression of legal or regulatory requirements or violation of the Company's code of conduct. The details of vigil mechanism are published on website of the Company. No complaints were received during the year under whistle blower policy.

The Company has set-up an investor grievance mechanism to respond to investor grievances. There were no complaints from investors pending at the beginning of the year. The Company received 124 investors related complaints during the year and all complaints were resolved satisfactorily.

If any investigation leads to the Chairman of Audit Committee to conclude that an unethical or improper activity has been committed, the Chairman will recommend to the Management of the Company to take such disciplinary or corrective action as deemed fit. It is clarified that any disciplinary or corrective action initiated against the subject because of the findings of an investigation pursuant to this policy would adhere to the applicable personnel or staff conduct and disciplinary procedures. A quarterly status on number of complaints received under this policy is placed by the Audit Committee to the Board. We hereby affirm that no Director/employee has been denied access to the Chairman of the Audit Committee and that no complaints were received during the reporting year.

Principle 2

Steps taken or impact on conservation of energy

- Silvassa facility has set up Combined Sewage cum Effluent Treatment Plant with capacity of around 37 kl per day. Treated water is used for gardening and other requirements and remaining goes to replenish groundwater.
- Entire Air Conditioning System operations handled by AC smart software which results in optimal efficiency and reduced energy.
- Drip and Sprinkler system installed for Landscape which uses recycled water from Sewage Treatment Plant
- Variable Frequency Drive (VFD) based Air compressor is being used for air supply to the plant.
- Installed separate Small capacity Air Compressor to cater to Equipment requiring continuous Air. This has resulted in reduced running of higher capacity compressor

- Automatic Power Factor Controllers (APFC) to maintain Near to unity Power factor.
- Timer based Lighting system for Street Lights
- All Pumps / Motors operated through VFD.
- Hot Air Exhaust Duct for Air Compressor to increase Air Compressor Efficiency.
- Plant air leakage rectified in filling and blending section.
- Fm-12 lowerator infeed conveyor removed, power saved up to 0.5 hp.
- Three 01 hp conveyors removed from FFM-03 line. (unwanted esel conveyors) power saved up to 3.5 hp.
- UPS provided for FFM-01&02 lines and Automatic Storage Retrieval System (ASRS), it is also saved power consumption.
- Cleaning of carbon from coil of thermopac TP 02. This has improved heat transfer to coil & reduced firing time of burner to heat thermic fluid oil. Electricity & diesel are saved, efficiency of thermopac has been increased.

Principle 3

Employee Well-being:

Gulf Oil drives its all Human Capital interventions based on the Group Guiding principles & brand values. Major trends such as Business analytics, Artificial Intelligence, Automation, Use of IT have large impact on the Human Capital now a days & we have incorporated it as part of our Human Capital Strategy.

The employee well-being & safety is critical along with the achievement of the business objectives. We have a large diversified workforce spread across the locations. The company has put "Safety First" programme to promote safety practises across plant & non plant locations.

As on March 31, 2019, the permanent employee strength is 575+ who are dealing with newer challenges every day. The company has 5% of the women population. The company consciously taking steps to improve the gender diversity through its talent acquisition & campus relationship programme. There are 200+ contractual/ temporary staff engaged mainly at the plant location & sales support. The company does not have any employees with permanent disability. We recognise the right to freedom of association, however, there are no employee associations within the company.

We are an equal opportunity employer & we focus on the meritocracy at all stages right from hiring to deployment, role mapping to remuneration. We have a robust process of selection of best talent right from entry level to top management. We have moved to digitisation of the recruitment & selection process through RMS (Resume Management System). The comprehensive onboarding programme with help of digitised platform of GOLD (Gulf Oil Learning Academy) helps assimilate the new talent quickly with the organisation.

Prevention of Sexual Harassment at workplace :

The company has put in the required policy & framework to address the Prevention of Sexual Harassment at Workplace since 2014. The new committee has been appointed in line with the provisions of the Prevention of Sexual Harassment at workplace Act 2013. The internal complaints committee consisting of three employees (with one women representation) & one independent external panel member is in place. The regular awareness sessions are conducted for employees.

Following statistics shows the status on the no. of complaints.

Sr. No.	Category	No. of Complaints filed during the financial year	No. of Complaints pending as on end of financial year
01	Child Labour/ Forced Labour / Involuntary Labour	Nil	Nil
02	Sexual harassment	Nil	Nil
03	Discriminatory employment	Nil	Nil

Human Capital Strategy:

The company has put in place the Human Capital strategy in line with its vision & overall business plan. The important pillars of the strategy includes, Leadership development, Culture building, Talent Development & Organisation alignment.

Performance & Talent Development:

Our performance Management system ASPIRE (Align: Strive: Perform: Inspire: Reward: Enable), is digitised platform designed to achieve the holistic development of the employees through performance differentiation & transparency & effective evaluation.

Capability Building :

Employee Capability Development is one of the important pillar for our Human Capital Strategy taking care of the development needs in the areas of Functional, Behavioural & Leadership Skills.

- The capability building agenda is driven through defined competency framework consisting of functional & behavioural competencies & 70:20:10 principle (70% on the job, 20% through various projects & 10% through class room/ on line programmes) for current as well as future skills.
- On the Job training (OJT) is an important initiative at plant locations covering the employees as well as contractual staff.
- The company also conducts organisation wide webinars covering different subjects.
- The digitised learning platform , "GOLD" Academy (Gulf Oil Learning Academy)" has rich contents & it is extended to global operations covering the distributors, key customers, licensees worldwide. The programmes are available in three languages – English, Spanish & Mandarin.

- The company supports various Leadership Development programmes mainly – GOAL (Gulf Oil Advanced Leadership Programme), SEP (Sales Excellence Programme), ELP (Emerging Leaders Programme)
- Capability Building through Job Rotation – The company provides opportunities to the employees through job rotation programmes across geographies to enhance their capabilities & career.

HSE (Health, Safety, Security & Environment):

The company promotes safety at workplace (Plant & non plant locations) which is one of the important enabler of the Human Capital Strategy. There are specific programmes & initiatives for plant & non plant safety (primarily at offices, depot operations) are in place. The safety & fire marshals at each location ensures the implementation of the safety guidelines.

To promote the well being of the employees, various awareness programmes are organised including health talk series on the various contemporary topics, health sessions, Office Yoga. The company has the annual medical check up policy in place to ensure the health & fitness for the employees.

The company has introduced the critical illness cover for all its employees to support the additional medical expenses on account of the critical illness. The company has also continued the support for the Top up medical cover for the employee & family, and for the parents of the employees in addition to the existing medical claim policy for employee family & parents. The term insurance & personal accident insurance cover continues.

The company has committed to provide an ergonomically safe & comfortable work environment at all its offices, Depot locations & Plants.

Employee Communication:

There are regular town hall communication meetings & regular communications through various media such as e mailers, employee intranet portal helps to build the excellent teamwork & work culture.

The internal social media platform Hi net helps employees to connect & express themselves regularly.

The “Info Capsule” platform helps employees to share their experiences & achievements with wider audience on regular basis.

Reward & Recognition:

The company drives various Rewards & Recognition Programs. Recognizing the extraordinary efforts put in by the employees are rewarded through various schemes helps to boost the employee morale.

For the year FY 2018-19, total 72 employees were honoured under the long service award programme showing employee loyalty & dedication for the company.

Principle 4

The Company recognizes the need and importance of focused and inclusive social and economic development especially in the communities and areas within which it operates. The Company engage with both internal and external stakeholders to understand their concerns and address the same with formal and informal mechanism. The Company aims to maintain cordial relationship with all its stakeholders. The Company has undertaken various CSR initiatives in the area of education, road safety awareness, rural development and promoting health care in and around its area of operations and local area at Silvassa, DNH and Ennore, Chennai.

The Company funded Mobile Medical unit continued its operations during the year in the remote villages near Silvassa, DNH. The unit provides free medical test, support and medicines to the tribal of remote villages near Silvassa. The state of the art facilities are available to the villagers free of cost in the mobile unit which includes diagnostic facility, laboratory test and medicine dispensing and health checkup.

The Company has established Safe Drinking Water ATM at Ennore, Chennai with the technical support from Sarvajal Piramal and Hinduja Foundation. Safe Drinking water shall be sold at 20 paise per liter to the villagers. The water ATM is equipped with Water shed building, purification equipments and borewell. Water ATM will have a recharge bore to recharge ground water using back splash water and roof top harvesting . The Company aims to be Water Positive. During the year, Company has taken various within the fence water conservation initiatives. The Company aims to install similar water ATM in other locations.

Company also provides vocational skill development training to auto-mechanics in the auto industry and provides certificate for enhancement of their vocational skill, which will help them to service the industry in better and efficient manner.

Principle 5

The Company respect the laws and human rights provisions in all locations in which it operates. The Code of conduct is applicable to all Directors, employees and business partners of the Company and there were no complaints received during the year.

Principle 6

The facilities continued its efforts towards energy conservation and the various initiatives which are listed below:

- Entire Air Conditioning System operations handled by AC smart software which results in optimal efficiency and reduced energy
- Drip and Sprinkler system installed for Landscape which uses recycled water from Sewage Treatment Plant
- Variable Frequency Drive (VFD) based Air compressor is being used for air supply to the plant
- Installed separate Small capacity Air Compressor to cater to Equipment requiring continuous Air. This has resulted in reduced running of higher capacity compressor
- Automatic Power Factor Controllers (APFC) to maintain Near to unity Power factor
- Timer based Lighting system for Street Lights
- All Pumps / Motors operated through VFD
- Hot Air Exhaust Duct for Air Compressor to increase Air Compressor Efficiency

Our Chennai facility has been awarded “Gold Level Certification” by the Indian Green Building Council (IGBC).

Principle 7

The Company does not take part (directly or indirectly) in any political activity and does not pay any political contributions in cash or make in kind. The Company complies with all applicable laws and regulations that prohibit bribery and corruption. The Company aims to engage constructively with local government and build healthy relationship with them.

The Company is a member of the following trade/chamber/ association:.

- Bombay Chamber of Commerce and Industry (BCCI)
- Confederation of Indian Industry (CII)

Principle 8

The Company seeks to build cordial and constructive relationships with all the stakeholders. The Company has a policy on Corporate Social Responsibility and the focal areas being promoting healthcare, Road safety awareness and promoting education to underprivileged children. The Company has undertaken various multi-year CSR projects for achieving the above objectives.

The details of CSR projects undertaken during the year are provided in CSR Report, which is forming part of Director's Report.

Principle 9

The Company is in the business of meeting the needs of its customers in an efficient manner. The products are developed based on regular interactions, feedback and

survey of consumers. For receiving and resolving customer complaints there are systems in place to record and resolve the complaints. No consumer complaints were pending at the end of the financial year. The Company displays additional information such as product benefits and technical specification used in the product, in addition to the mandatory information on the product label. There are no cases filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and /or anti-competitive behaviour during the last five years and pending as on end of financial year. The Company regularly tracks consumer satisfaction scores and brand positions in different channels and amongst its distributors and take appropriate steps to improve customer satisfaction.