

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 – 400 093
4.	Website	www.gulfoilindia.com
5.	E-mail ID	secretarial@gulfoil.co.in
6.	Financial year reported	April 1, 2019 to March 31, 2020
7.	Sector(s) that the Company is engaged in (industrial activity code-wise)	Manufacturing and selling automotive and industrial lubricating oil, greases and two-wheeler batteries. (NIC Code: 19201)
8.	List three key products/services that the Company manufactures/provides (as in balance sheet)	Manufacturing and selling of automotive and industrial 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 offices in international locations however, products are being exported to Bangladesh, Indonesia, Nepal, Qatar, Africa, among others. Number of national locations: The Management operates from the Company's head office and registered office in Mumbai, Maharashtra. Apart from this, there are four regional offices and 30+ 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)	₹ 1,002.11 Lakhs
2.	Total Turnover (INR)	₹ 1,64,350.07 Lakhs
3.	Total profit after taxes (INR)	₹ 20,252.16 Lakhs
4.	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	The Company has spent ₹ 247.51 lakhs being 1.06 % of average net profit of last three financial years towards CSR activities in current reporting year.
5.	List of activities in which expenditure in above has been incurred	<p>The Company undertook multi-year projects during FY2019-20 to support the following CSR objectives:</p> <ul style="list-style-type: none"> Water conservation and safe drinking water ATM Education and vocational skill development programmes Healthcare awareness Road safety awareness promotions <p>(please refer Annexure A to the Board's Report for detailed information).</p>

Section C: Other Details

Does the Company have any subsidiary company/companies?

No.

Do the subsidiary company/companies participate in the Business Responsibility (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%, over 60%)

The Company Code of Conduct is applicable to business entities who are associated with Gulf Oil. The business associates, however, do not directly participate in BR initiatives of the Company.

Section D: BR Information

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

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 & CEO
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 employees.
Principle 4 (P4)	Businesses should respect the interest of, and be responsive towards stakeholders, especially those who are disadvantaged, vulnerable and marginalised.
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 the above?	Yes								
2	Has the policy been formulated in consultation with relevant stakeholders?	Yes (details on when the policies were formed/updated)-.								
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 ISO 9001 (QMS), ISO14001 (EMS), TS 16949:2009 and ISO 18001 (OHSAS) compliant.								
4	Has the policy been approved by the Board? If yes, has it been signed by MD/Owner/CEO/appropriate Board Director?	Yes, most of the policies are approved by functional Heads and some adopted by the Board.								
5	Does the Company have a specified Committee to implement and evaluate adherence to the Code of Conduct and EHS policy among employees?	Yes. The implementation and adherence to the code of conduct and EHS policy are overseen by the BR Head.								

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
6	Indicate the link for the policy to be viewed online?	P1	P2	P3	P4	P5	P6	P7	P8	P9
		Ref. \$	Ref. #	Ref. \$	Ref.*	Ref. \$	Ref. \$	Ref. \$	Ref. \$	Ref. \$
		# Environment policy: https://www.gulfoilindia.com/about-us/safety-health-environmental-care/*CSR policy link: https://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, using the stakeholder engagement practices in place.								
8	Does the Company have in house structure to implement the policy/policies?	Yes, the system is in place is commensurate with the size of the Company.								
9	Does the Company have a grievance redressal mechanism related to the policy/policies?	Yes, the Company has a robust mechanism for grievance redressal.								
10	Has the Company carried out independent audit/evaluation of the working of this policy by an internal or external agency?	No. Being in the 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 assesses the BR performance of the Company. Within 3 months, 3-6 months, annually, or in over 1 year.

The Board of Directors of the Company assesses the 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?

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

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

Section E: Principle-Wise Performance

Principle 1

Businesses should conduct and govern themselves with ethics, transparency and accountability.

The Company is committed to adhere to the highest standards of ethical, moral and legal principles to ensure efficiency, fairness and transparency in conducting business operations. The Company adopted the code of conduct which lays down general principles that should govern the actions of the Company and its employees and emphasises the adoption of personal ethics, integrity, confidentiality

and discipline of the highest degree in dealing with matters relating to the Company, which are covered across its interactions with any stakeholder viz. suppliers, customers, among others. The principals involved pertain to compliance with law, dealing with gifts, bribes, equal opportunities, action against sexual harassment, concurrent employment, generic or work-specific behavioural patterns, maintaining confidentiality and information security and disciplinary processes. The code of conduct is signed by employees on joining the Company.

The Company also has a robust 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. Details on this mechanism are published on the Company's website. No complaints were received during the year under whistle-blower policy.

The Company established a mechanism to respond to investor grievances. There were no complaints from investors pending at the end the year. During the year under review, the Company received 139 investor-related complaints, which were resolved satisfactorily.

If investigations lead 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, based on 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 submitted to the Board by the Audit Committee. The Company hereby affirms that no Director/employee has been denied access to the Chairman of the Audit Committee and no complaints were received during the reporting year.

Principle 2

Steps taken or Impact on conservation of Energy

- Energy Audit conducted through External Consultants to identify areas of Conservation. Various projects have been identified for implementation;
- Motion sensor installed in the meeting room and admin open office area to reduce the power consumption;
- Synchronisation of Infeed and outfeed conveyors with filling machine speed to avoid idle running of all conveyors;
- Barrel filling machine pumps are synchronised with filling sequence to avoid idle running;
- Optimised the Admin building HVAC system and temperature setting and achieved reduction in tonnage capacity up to 8TR;
- Continuous Batch operation of VI improver to conserve and reduce heat loss of Thermic Fluid heater resulting in reduction of Diesel Consumption;
- Reduce electrical consumption by 275 units/day by installing Cyclic Timer with a pre-programmed logic in PLC room to control running of 2 ACs with single AC at a time.
- Replaced Pump motor Rated 5 HP, 940 RPM and installed another Pump motor rated 5 HP, 1440 RPM which minimised the unloading hours of 18 KL tank from 4 hrs. to 2 hrs.;
- Replaced pump motor rated 7.5 HP with new pump motor rated 15 HP which minimised unloading hours from 4 hrs. to 1 hr. for MEG;
- Optimised the usage of Additive Heating Ovens from 4 to 2 as per the production load, resulted into considerable energy saving and reduced carbon emission;
- Optimised the usage of 8.5 TR Ductable Package AC to set to run during office hours only to save energy consumption;
- Aluminium pipeline for air supply to blending & filling area is done in place of PVC pipes to eliminate air leakages and thus good energy saving is realised.

Principle 3

Businesses should promote the well-being of employees.

Gulf Oil's HR practices are designed to evolve in line with changing business requirements. Aligning the organisational structure, capability development and strengthening other HR processes are at the centre of the Human Capital strategy to ensure that it creates a culture which is deeply in harmony with the organisational principles and brand values.

The Company has put the 'Safety First' programme in place to promote safe practices across plants and non-plant locations. Employee well-being and safety are critical in the achievement of business objectives. This has taken paramount importance during pandemic time.

The Company has a large and diversified workforce across locations. As on March 31, 2020, following are the key statistics:

1. Permanent employee strength: 600+
2. Women population: 6%
3. Average age of organisation: 37 years
4. Training person days: 2,112
5. Digital training modules: 110
6. Employees covered: 560
7. Assessments done: 1,028 with 86% scoring 80%+
8. Long-service award winners: 57 employees

The Company takes conscious steps to improve gender diversity through its talent acquisition and campus relationship programmes. There are 200+ contractual or temporary staff engaged mainly at the plant locations and within sales support. The Company does not have employees with permanent disabilities. The Company recognises the right to freedom of association, however, there are no employee associations within the Company.

The Company is an equal opportunity employer and focus on meritocracy above all, across stages and position, from hiring to deployment, role mapping to remuneration. It has a robust process of selecting the best talent for entry level to top management. The Company is working to digitise the recruitment and selection process through Resume Management System (RMS). The comprehensive on-boarding programme, aided by the digitised Gulf Oil Learning Academy (GOLD) platform, helps assimilate new talents swiftly and seamlessly within the team. The performance Management system, Align: Strive: Perform: Inspire: Reward: Enable (ASPIRE) is a digitised medium designed to achieve holistic development of employees.

The Company has zero reported accidents at both of its plants. It conducts regular mock drills and various safety training programmes at the plants.

Prevention of sexual harassment at workplace:

The Company established statutory policy and framework over this issue with the adoption of the Prevention of Sexual Harassment at Workplace since 2014 clause. The new committee was 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) and one independent external panel member is in place. Regular awareness sessions are conducted for employees.

Following statistics show the status on the complaints registered with the Company:

Sr. No.	Category	No. of complaints filed during the financial year	No. of complaints pending as on end of financial year
1	Child Labour/ Forced Labour/ Involuntary Labour	Nil	Nil
2	Sexual harassment	Nil	Nil
3	Discriminatory employment	Nil	Nil

Human Capital Strategy

To achieve the organisation's objectives, the Company drew up the Human Capital strategy. The important pillars of the strategy include, leadership development, culture building, talent development and organisation alignment.

Performance and talent development

The Company's performance management system, ASPIRE is designed to achieve all-round development of employees through performance differentiation, transparency and effective evaluation.

Capability building

Employee capability development is among the important pillars in the Company's the strategy. It takes care of development needs in functional, behavioural and leadership skills.

- The agenda is driven through defined competency framework consisting of functional and behavioural competencies as also the 70:20:10 principle (70% on the job, 20% through various projects and 10% through classroom/ online programmes) for current and future skills.
- On-the-job training (OJT) is an important initiative at plant locations that includes employees and contractual staff.
- The Company conducts organisation-wide webinars on myriad subjects.
- The digitised learning platform, GOLD Academy comprises rich content and is extended to global operations covering distributors, key customers, licensees worldwide. The programmes are available in three languages – English, Spanish and Mandarin.
- The Company supports leadership development programmes like – Gulf Oil Advanced Leadership Programme (GOAL), Sales Excellence Programme (SEP), Emerging Leaders Programme (ELP)
- Capability building through functional rotation – The Company provides opportunities to employees through job rotation programmes across geographies to augment their skillset.

Health, Safety, Security & Environment (HSE)

To promote employee well-being, various safety awareness programmes are organised including health talk series on contemporary subjects, health sessions like office yoga, Stepthelon activity, among others. The Company has an annual medical checkup policy in place to ensure the health and fitness of employees.

The Company promotes safety at workplace and plants as a crucial enabler of the Human Capital strategy. There are specific programmes and initiatives for plant and non-plant safety. The safety and fire marshals at each location ensure the implementation of applicable guidelines.

The Company introduced critical illness coverage for employees, to support additional medical expenses on account of critical illness. It continues to fund top-up medical coverage for employees, in addition to the existing medical claim policy for employee family and parents. The Company also extends term insurance and personal accident insurance cover. It is committed to providing an ergonomically safe and comfortable work environment across its offices, depot locations and plants.

The Company undertakes several IT initiatives to facilitate faster decision making, quick availability of the data and to reduce paperwork.

Employee communication

The internal social media platform, Hi Net helps employees connect and express their views regularly. The town hall assemblies and regular communications through various mediums, such as e mailers, employee intranet portal help build exemplary teams and work culture. The 'Info Capsule' platform is for employees to share their experiences and achievements with a wider audience base regularly.

Reward and recognition

The Company drives multiple rewards and recognition programmes to acknowledge the unmatched efforts put in by employees through schemes that boost employee morale. They are also honoured for their long services as gratitude for continued loyalty for the Company.

Principle 4

Businesses should respect the interest of, and be responsive towards stakeholders, especially those who are disadvantaged, vulnerable and marginalised.

The Company recognises the importance of focused and inclusive social and economic development, especially in communities within which it operates. It engages with internal and external stakeholders to understand their concerns and address them using formal and informal mechanisms. It seeks to maintain cordial relationship with its stakeholders and has undertaken CSR initiatives on education, road safety awareness, rural development and promoting healthcare among local communities 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 indigenous community near Silvassa. The state-of-the-art facilities provide villagers in the mobile unit free services, which include diagnostics, laboratory tests, medicine dispensing and health examinations.

The Company established Safe Drinking Water ATM at Ennore, Chennai with technical support from Sarvajal Piramal and Hinduja Foundation. Safe drinking water is sold at 20 paise per litre to villagers. The water ATM is equipped with water shed building, purification equipment and borewell. It will have a bore to recharge groundwater using backslash water and rooftop harvesting. The Company aims to be water positive. During the year, it adopted multiple within-the-fence water conservation initiatives. The Company aims to install similar water ATM in other locations. Vocational skill development training is provided to auto-mechanics in the auto industry, followed by certification on enhancement of skill, which helps them service the industry better and more efficiently.

Under "Gulf Hai Saath" campaign, the Company has provided cash support to mechanics registered with it across India. It provided the mechanics cash through direct bank payment/ Food Bazar vouchers during the lockdown period.

Principle 5
Businesses should respect and promote human rights.

The Company respects and upholds the laws and human rights provisions across locations in which it operates. The code of conduct is applicable for all Directors, employees and business partners of the Company and there were no complaints received regarding violations during the year. As a policy, the Company does not employ child labour.

Principle 6
Businesses should respect, protect and make efforts to restore environment.

- Improved the capability of ETP by installing online monitoring system to ensure consistency in process parameters of treated waste water, and more suitable for plantation use.
- Process loss is maintained within 0.15% against industry standards of 0.3% - 0.5% through PLC controlled flow meter based blending operations, resulting in low process waste from manufacturing operations.
- Awareness Programmes to strengthen environment improvement culture is being done time to time in the plant involving all employees. Initiatives such as environment day celebrations through themes of waste reduction and tree plantation, training Programmes is being conducted at all levels.
- Program on cotton waste reduction has given environmental benefit in terms of 30% waste reduction in comparison to 2018-19.

- Disposal of product done through proper channel and same is communicated through product labels and Safety data sheets.
- Energy Audit conducted through External Consultants to identify areas of Conservation. Various projects have been identified for implementation;
- Motion sensor installed in the meeting room and admin open office area to reduce the power consumption;
- Synchronisation of Infeed and outfeed conveyors with filling machine speed to avoid idle running of all conveyors;
- Barrel filling machine pumps are synchronised with filling sequence to avoid idle running;
- Optimised the Admin building HVAC system and temperature setting and achieved reduction in tonnage capacity up to 8TR;
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- Aluminium pipeline for air supply to blending & filling area is done in place of PVC pipes to eliminate air leakages and thus good energy saving is realised.s

Principle 7
Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner.

The Company does not take part (directly or indirectly) in any political activity and make any political contributions in cash or kind. It complies with applicable laws and regulations that prohibit bribery and corruption. It aims to engage constructively with the local government, regulatory authorities and relevant public bodies for the development of public policies keeping in view the sustainability and compliance commitments thereby creating a better business environment and build healthy relationships 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

Businesses should support inclusive growth and equitable development.

The Company seeks to build cordial and constructive relationships with its stakeholders. The Company has a Corporate Social Responsibility policy and with areas of focus being promoting healthcare, raising awareness on road safety and educating underprivileged children. The Company has undertaken various multi-year CSR projects to achieve these objectives. The details of CSR projects taken up during the year and their performance are recorded in the CSR Report, which forms part of Director's Report. The Company has systems in place to drive and monitor the CSR activities, continuous follow ups and track the initiatives conducted under CSR to determine the end results and the benefits to the community.

Principle 9

Businesses should engage with and provide value to their consumers in a responsible manner.

The Company works to meet and manage customer needs efficiently. The products are developed based on regular interactions, feedback and survey of consumers. There are robust mechanisms and practices in place to record and resolve customer complaints. None of these complaints remained pending at the end of the financial year. The Company discloses additional information, such as product benefits and technical specifications, in addition to the information mandated to be included in the product label. There were 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 or pending as on end of financial year. The Company regularly tracks consumer satisfaction scores and brand positions across channels and among its distributors and adopts appropriate measures to improve customer satisfaction.