

Business Responsibility (BR) Report

SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

S. 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., 12 th 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, 2020 to March 31, 2021
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 selling of two-wheeler batteries.
9	Total number of locations where business activity is undertaken by the Company	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 around 30 depots to cater pan India operations. The Company's manufacturing plant is located in Silvassa and Ennore, Chennai.
10	Markets served by the Company – Local/State/ National/ International	Local/State/ National/ International

SECTION B: FINANCIAL DETAILS OF THE COMPANY

S. No.	Particulars	Information
1	Paid up Capital (INR)	₹ 1,006.19 Lakhs
2	Total Turnover (INR)	₹ 1,65,220.51 Lakhs
3	Total profit after taxes (INR)	₹ 20,008.58 Lakhs
4	Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	(a) In terms of Section 135 of Companies Act, 2013 (INR): Rs. 471.65 Lakhs (b) As percentage of profit after tax (%): 2.36%
5	List of activities in which expenditure in above has been incurred	1. Road Safety promotions 2. Water positive programs 3. Kushal Technician and ICEMA Vocational Trainings 4. Covid pandemic 5. Other programs

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

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

SECTION D: BR INFORMATION

1. Details of Director/ Directors responsible for BR

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

DIN Number	02808474
Name	Mr. Ravi Chawla
Designation	Managing Director & CEO

b) Details of the BR head:

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

2. 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.

Details of compliance (Reply in Y/N)

Sr. No.	Question No.	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for the above?	Yes								
2	Has the policy been formulated in consultation with 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 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, the policies are approved 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?	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: 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 Company's intranet portal.								

Sr. No.	Question No.	P1	P2	P3	P4	P5	P6	P7	P8	P9
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 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:

Sr. No.	Question No.	P1	P2	P3	P4	P5	P6	P7	P8	P9
1	The company has not understood the Principles									
2	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles									
3	The company does not have financial or manpower resources available for the task						Not applicable.			
4	It is planned to be done within next 6 months									
5	It is planned to be done within the next 1 year									
6	Any other reason (please specify)									

Governance related to BR

Indicate the frequency with which the Board of Directors, Committees of the Board or CEO to assess the BR performance of the Company

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: Ethics, Transparency and Accountability

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

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 emphasizes 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 code is currently applicable to all permanent employees and contract personnel that the company employs.

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

The Company has a robust whistle-blower policy for Directors and employees to report to the management, instances of unethical behavior, actual or suspected fraud, transgression of legal or regulatory requirements, Insider Trading or violation of the Company's code of conduct. Details on this mechanism are published on the Company's website. **No whistle blower complaints were received during the financial year.**

The Company established a mechanism to respond to investor grievances. **There were no complaints from investors pending at the beginning of the financial year. The Company received 20 investors**

related complaints during the financial year and all complaints were resolved satisfactorily.

If investigations lead to the Chairperson of Audit Committee to conclude that an unethical or improper activity has been committed, the Chairperson 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 Chairperson of the Audit Committee and no complaints were received during the reporting financial year.**

Principle 2: Product Life Cycle Sustainability

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

The company has been a pioneer of Long Drain products in India and developed multiple product lines that have incorporated environmental concerns over the last financial year also. Some important product lines to highlight are:

- Gulf Superfleet ULE Dura Max
- Gulf Gear ED Dura Max
- Gulf Supreme Duty ULE

In addition to this, various other products such as Very High Viscosity Index hydraulic oils and other synthetic lubricants have been developed by the company that provide both extended drain intervals and better fuel economy.

2. For each such product, provide the following details in respect of resource use (energy, water, raw material etc.)

- **Reduction during sourcing/production/distribution achieved since the previous financial year throughout the value chain?**

The following initiatives were taken over the last financial year for more efficient use of resources throughout the value chain:

- A process improvement in blending is done to improve cleaning effectiveness of blending kettles by putting jet-spray flushing mechanism inside the kettles. Also, it reduces the flushing oil waste generation by 25% during a product changeover.

- Replacement of diesel-based forklift at shopfloor with battery-based forklift will deliver zero emissions at shopfloor.
- Conversion of thermic fluid heaters running on diesel to an efficient medium i.e. liquefied petroleum gas reduces environmental emissions significantly and also reduces cost by 25%.
- **Reduction during usage by consumers (energy, water) has been achieved since the previous financial year?**

The company has developed BS VI variants of the products mentioned above that has retained drain intervals while reducing emissions and improving fuel efficiency. In addition to this, the Company's newly formulated VHVI (Very High Viscosity Index) hydraulic oil has proven the performance in injection molding machines by reducing the energy consumption. Conserving energy saves money by lowering the utility bills for the users along with saving the environment by reducing carbon footprint.

3. Does the company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably? Provide details thereof, in about 50 words or so.

The company sources its raw materials from reputable international and domestic sources that are expected to follow BR protocols and are periodically audited for quality. All safety and environmental protocols are followed for internal logistics of the company. There is a continuous effort to reduce cost and emissions within the supply chain. Over the last year, tanker unloading time has been reduced by 50% by modifying the unloading lines with non-return valves resulting in lower emissions and higher efficiency in the supply chain.

4. Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?

For general items such stationery and other common and general spares, all procurement is done from local and nearby vendors. In addition to this, all packaging materials used by the company are sourced domestically from small and medium enterprises.

- **If yes, what steps have been taken to improve their capacity and capability of local and small vendors?**

A comprehensive process called the Quality Management System is responsible for the quality control of all sourced materials. They undergo product inspection and audits in addition to quality checks. These processes help to ensure that the vendors are

capable in supplying the materials and the audits help the vendors correct any shortcomings.

5. Does the company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste?

Waste segregation activity is undertaken at the plant to differentiate between hazardous and non-hazardous waste. Hazardous waste is sold to Recyclers authorized by the PCB. Moreover, keeping in mind the importance of water management, the waste water is 100% recycled in Chennai Plant.

Principle 3: Employees Well-being

- 1. **Total number of permanent employees:** 618
- 2. **Total number of employees hired on temporary/ contractual/ casual basis:** 200+
- 3. **Total number of permanent women employees:** 42
- 4. **Please indicate the number of permanent employees with disabilities:** Nil
- 5. **Do you have an employee association that is recognized by management:** No
- 6. **Percentage of your permanent employees is members of this recognized employee association?:** NA
- 7. **Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year:**

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

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

Employees are core asset for the organization & the practices designed at the Company are primarily to cater to the changing business requirements. The human capital strategy is designed carefully to ensure that we create the culture which is engrained based on the Group guiding principles & Brand values. The focused practices include employee safety, capability development & skill building of the employees, nurturing

best talent within the organization. In order to keep the pace with the changing conditions, the company revisits the policies & practices so as to ensure the employee wellbeing agenda is met effectively.

The company has put "Safety First" programme to promote safety practices across plant & non plant locations. The employee wellbeing & safety is critical along with the achievement of the business objectives.

Some relevant statistics on this front are:

Total Training Man-days- 1586

Digital Training (No. of courses)- 277

No. of assessments done – 1214

The average age of the organization is 39 years.

Long service Award winners – April 2020 till March 2021- 86 employees

The company is consciously taking steps to improve the gender diversity through its talent acquisition & campus relationship programme. We recognize 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. The Company has a robust process of selection of best talent right from entry level to top management.

Capability Building is one of the key elements of the human capital strategy. The company emphasizes on covering wide range of the skill sets for its employees. In the financial year 2020-21, during the lockdown period, the major focus was on LOC (live on classroom) sessions covering functional & behavioral topics through webinars as well as web-based trainings. The same was extended to our channel partner teams as well. The digitized learning platform, "GOLD" Academy (Gulf Oil Learning & Development 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 also supports capability development through job rotation across geographies to enhance their capabilities & career.

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 Sexual Harassment of Women at Workplace (Prevention,

Prohibition and Redressal) Act, 2013. The internal complaints committee consisting of three employees (with one woman 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
1	Child Labour/ Forced Labour / Involuntary Labour	Nil	Nil
2	Sexual harassment	Nil	Nil
3	Discriminatory employment	Nil	Nil

HSSE (Health, Safety, Security & Environment):

To promote the well-being of the employees, and more so during the Covid-19 pandemic period, various safety awareness programmes are organised including health talk series on the various contemporary topics, health sessions, Yoga sessions etc. The company facilitates the annual medical checkup for all its employees. The company has implemented the global safety practices last year & employees are taken through the safe practices at plant & non plant locations. The company has facilitated the agile working conditions for its employees – work from home, flexible working are some of the practices adopted to ensure the work life balance.

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.

Principle 4: Stakeholder Engagement

1. Has the company mapped its internal and external stakeholders? Yes/No

Yes. The stakeholders identified are: Employees, dealers, mechanics, truck drivers, suppliers, regulatory authorities, NGOs, communities surrounding plants and offices

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

Local communities around Chennai plant were recognized as vulnerable mainly due to water scarcity concerns and projects were undertaken accordingly.

3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders?

The Company recognizes 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 has taken up the Lake Restoration project in Chennai. The first project taken up was “Thamaraikulam Lake Rejuvenation and Restoration Project”. The project is completed & handed over to the community. The Company has taken up one more lake restoration project “Sathan Kadu Lake Rejuvenation and Restoration Project”. The work is in full swing & the project is expected to be completed in financial year 2022.

Principle 5: Human Rights

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

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.

2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?

There were no complaints received regarding human rights violations during the financial year. As a policy, the Company does not employ child labour.

Principle 6: Environmental

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

The company has an HSSE policy that addresses environmental concerns and it is applicable only to the company.

2. Does the Company have strategies / initiatives to address global environmental issues such as climate change, global warming, etc.?

The company is committed to comply with all applicable laws and intends to uphold high standards for Occupational Health, Safety and Environment. The company is conscious of the impact of its manufacturing operations as well as products on the environment due to emissions and resource consumption throughout their life cycle. The company's approach towards climate change mitigation focuses on product innovation to improve fuel efficiency and reduce emissions for customers and reducing the environmental footprint of our manufacturing operations through initiatives like 3R and continuous monitoring of energy and water usage. Furthermore, the company has undertaken projects such as lake restoration in Ennore and installation of water ATMs in Athipet to address the issue of water shortage in the vicinity of the Ennore Plant.

3. Does the company identify and assess potential environmental risks? Y/N

Yes, by identifying significant environmental risks through Aspect Impact study

4. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N.

Following are the projects undertaken in financial 2020-21 which will contribute towards cleaner environment –

- Rain water conservation project to channelize rooftop water across the plant has a potential to recharge ground with 1,80,000 litres of water in a day.
- Installed and commissioned 50 KWP rated Solar energy plant which will generate 150-200 units per day.
- Conversion of thermic fluid heaters running on diesel to an efficient medium i.e. liquefied petroleum gas reduces environmental emissions significantly and also reduces cost by 25%.

5. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?

The company complies with all protocols set by the regulatory authorities for control of emissions. Periodic monitoring is undertaken by a third-party inspector approved by the SPCB to record, report and control the emissions generated at the plant on a monthly and

quarterly basis. All emissions have been found to be within limits stipulated by the CPCB/SPCB.

6. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.

There were no show cause/ legal notices received from CPCB/SPCB over the last financial year.

Principle 7: Policy Advocacy

1. Is your Company a member of any trade and chamber or association? If Yes, name only those major ones that your business deals with.

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

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

2. Have you advocated/ lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)

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.

Principle 8: Inclusive Growth

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

Education and skill building projects were undertaken to provide educational support to economically challenged children. Various road safety awareness programs were also conducted. In addition to this, various Covid support programs were initiated in view of the need of urgent support to vulnerable communities during the pandemic.

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

While the projects are designed and created by the in-house team in alignment with the values and strategy of the company, the implementation is undertaken by third party entities such as NGOs and Not for Profit Organizations.

3. Have you done any impact assessment of your initiative?

Yes, details below in Question 5.

4. What is your company's direct contribution to community development projects? Amount in INR and the details of the projects undertaken.

The company contributed an amount of 471.65 lakhs in FY 2020-21 towards CSR projects. Details of the activities undertaken can be found in the CSR report.

5. Have you done any impact assessment of your initiative? Have you taken steps to ensure that this community development initiative is successfully adopted by the community?

Yes, an internal impact assessment exercise is done of the initiatives undertaken by the company to monitor the activities and calibrate them for the best results of the stakeholders involved. This includes monitoring the CSR activities, continuous follow ups and tracking the initiatives conducted under CSR to determine the end results and the benefits to the community.

2. Does the Company display product information on the product label, over and above what is mandated as per local laws?

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.

3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behavior during the last five years and pending as on end of financial year?

There were no cases filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behavior during the last five years or pending as on end of financial year.

4. Did your company carry out any consumer survey/ consumer satisfaction trends?

The Company works to meet and manage customer needs efficiently. The products are developed based on regular interactions, feedback and survey of consumers. The Company regularly tracks consumer satisfaction scores and brand positions across channels and among its distributors and adopts appropriate measures to improve customer satisfaction.

Principle 9: Customer Value

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

There are robust mechanisms and practices in place to record and resolve customer complaints. A new and improved customer complaint redressal portal Gulf Care has been adopted for better customer complaint resolution. None of the complaints received remained pending at the end of the financial year.