

Business Responsibility Report for the Financial Year 2018-19

Section A: General Information about the Company

1. Corporate Identity Number (CIN) of the Company : L35999TN1962PLC004943
2. Name of the Company : Sundram Fasteners Limited
3. Registered address : 98A, VII Floor, Dr Radhakrishnan Salai, Mylapore, Chennai 600 004
4. Website : www.sundram.com
5. E-mail id : investorshelpdesk@sfl.co.in
6. Financial Year reported : 2018-19
7. Sector(s) that the Company is engaged in (industrial activity code-wise)

As per National Industrial Classification – 2008:

Section	Division	Description
C - Manufacturing	25	Manufacture of fabricated metal products, except machinery and equipment – Metal Fasteners.
G – Manufacture of motor vehicles, trailers and semi-trailers	29	Manufacture of motor vehicles, trailers and semitrailers – Parts and accessories for motor vehicles.

8. List three key products / services that the Company manufactures / provides (as in balance sheet)
 - i. High Tensile Fasteners
 - ii. Pump Assemblies, Engine and Transmission Components
 - iii. Powder metal parts
9. Total number of locations where business activity is undertaken by the Company
 - i. Number of international locations (details of major 5) : 2
 - ii. Number of national locations : 10
10. Markets served by the Company – Local / State / National / International:
Local / State / National / International

Section B: Financial Details of the Company (as on 31-03-2019)

1. Paid-up capital : ` 21.01 Crores
2. Total turnover : ` 4,034.28 Crores
3. Total profit after taxes: ` 437.12 Crores
4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)
The Company's total spending on CSR for FY 2018-2019 is 2% of the average profit after taxes in the previous three financial years.
5. List of activities in which expenditure in 4 above has been incurred:-
 - i. Education
 - ii. Healthcare
 - iii. Environmental sustainability
 - iv. Art and Culture

Section C: Other Details

1. Does the Company have any Subsidiary Company / Companies?

Yes. The Company has 6 Domestic Subsidiaries and 5 Overseas Subsidiaries as on March 31, 2019.

2. 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).

Business Responsibility initiatives of the Parent Company are generally followed by its manufacturing subsidiaries to the extent possible.

3. 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%]

No.

Section D: BR Information

1. Details of Directors responsible for BR

(a) Details of the Director / Director responsible for implementation of the BR policy / policies

DIN Number	Name	Designation
00517456	Ms Arathi Krishna	Managing Director

(b) Details of the BR Head

S. No.	Particulars	Details
1	DIN Number	00517456
2	Name	Ms Arathi Krishna
3	Designation	Managing Director
4	Telephone Number	044-28478500
5	E-Mail ID	mdoffice@sfl.co.in

2. Principle-wise BR Policy / Policies (Reply – Y/N)

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

S. No.	Questions	Business Ethics	Product Responsibility	Wellbeing of Employees	Stakeholder Engagement	Human Rights	Environment	Public Policy	CSR	Customer Relations
1	Do you have a policy / policies for	Y	Y	Y	Y	Y	Y	NA	Y	Y
2	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	-	Y	Y
3	Does the policy conform to any national / international standards? If yes, specify.*	Y	Y	Y	Y	Y	Y	-	Y	Y
4	Has the policy been approved by the Board? If yes, has it been signed by MD/owner/CEO/appropriate Board Director?	Y	Y	Y	Y	Y	Y	-	Y	Y
5	Does the company have a specified committee of the Board/ Director/Official to oversee the implementation of the policy?	Y	Y	Y	Y	Y	Y	-	Y	Y
6	Indicate the link for the policy to be viewed online?	**	**	**	**	**	**	-	**	**

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S. No.	Questions	Business Ethics	Product Responsibility	Wellbeing of Employees	Stakeholder Engagement	Human Rights	Environment	Public Policy	CSR	Customer Relations
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y	-	Y	Y
8	Does the company have in-house structure to implement the policy / policies	Y	Y	Y	Y	Y	Y	-	Y	Y
9	Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/policies?	Y	Y	Y	Y	Y	Y	-	Y	Y
10	Has the company carried out independent audit/evaluation of the working of this policy by an internal or external agency?	N	N	Y	N	N	Y	-	Y [#]	-

* The policy with respect to Product Responsibility are in line with international standards and practices such as ISO/TS 16949 – 2009 and ISO 14001:2004 standards. The policy with respect to Environment are in line with ISO 14001 standards. The policy with respect to business ethics, wellbeing of employees and CSR meets the national regulatory requirements, such as Corporate Laws, Environmental Laws and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**www.sundram.com/investor.php

[#] As a part of Secretarial Audit by the Secretarial Auditor

(b) If answer to S. No. 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

S. No.	Questions	Business Ethics	Product Responsibility	Wellbeing of Employees	Stakeholder Engagement	Human Rights	Environment	Public Policy	CSR	Customer Relations
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	-	-	-	-	-	-	-	-	-
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	-	-	-	-	-	-	*	-	-

*Considering the nature of Company's business, these principles have limited applicability. The Company complies with Regulations governing its operations and has taken initiatives to promote inclusive growth and environmental sustainability.

3. 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 Company assesses the BR Report / performance annually.

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

Yes. The Business Responsibility Report is available on the website under the following web link: <http://www.sundram.com/investor.php>

Section E: Principle-wise performance

Principle 1: Businesses should conduct and govern themselves with 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?

Yes. The Code of Business Conduct and Ethics policy covers only the Company.

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.

From	Received during the year 2018-19	Resolved during the year 2018-19
Shareholders	1	1

Pursuant to the Investor Education and Protection Fund (IEPF) Rules, 2016 and Section 124(6) of the Companies Act, 2013, 420 equity shares of Re 1/- each held by a shareholder were transferred to the IEPF Authority. On submission of necessary documents by the shareholder, the Company had submitted its verification report to the IEPF Authority, approving the claim. Having verified the documents, the IEPF Authority had approved the claim and the said number of 420 equity shares was credited to the demat account of the shareholder.

The shareholder had lodged a complaint with the SEBI Complaints Redressal System (SCORES) platform citing non-receipt of shares. A clarification letter in this regard was addressed to the shareholder by the Company.

The Company had disclosed the above mentioned details to the Securities and Exchange Board of India in SCORES platform and the complaint raised by the shareholder was disposed off by SEBI during the year.

Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle

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

The Company is environmentally conscious and is committed in creating, maintaining and ensuring a safe and clean environment. The Company is expanding and strengthening its position in the domestic and export markets, balancing commercial ambitions with environmental concern. The Company, by adopting appropriate green initiatives and practices, ensures to make processes and businesses more environment friendly.

Three products or services whose design has incorporated social or environmental concerns, risks and opportunities:-

- i. Sintered aluminium rotors for oil pumps
- ii. Exhaust Brake Valve
- iii. Non-Asbestos Gaskets
- iv. Quill Gear
- v. Shift Fork
- vi. Fasteners and other parts

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

- i. Reduction during sourcing / production / distribution achieved since the previous year throughout the value chain?
- ii. Reduction during usage by consumers (energy, water) has been achieved since the previous year?

Sintered aluminium rotors for oil pumps

Sintered rotors which were earlier manufactured using ferrous based raw material are now being manufactured using aluminium resulting in reduction of energy consumption.

Exhaust Brake Valve:

The Exhaust Brake Valve system is used in heavy vehicles to slow down the speed by use of exhaust system. No fire stroke occurs and no fuel is burnt thus, reducing the wear & tear on the regular brakes. This results in lesser fuel consumption and less or no noise.

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Non-Asbestos Gaskets:

Non Asbestos gaskets are being used for products such as Water & Oil Pumps replacing asbestos gaskets.

Quill Gear:

Profile which was earlier manufactured through forging route is now manufactured through powder metallurgy route. Cold forging route involved removal of materials to achieve the final shape and hence, waste of material. Since production through powder metallurgy involves "Zero loss" of material, material is conserved.

Shift Fork:

While the functional location of the component required alloyed iron powder for high strength and wear resistance, the non-functional portion required unalloyed powder. Technology was developed with mixes of powder (alloyed iron and unalloyed iron powder) and the component was produced, thus saving alloy material.

Fasteners and other parts:

Chrome free coatings (zinc flake coatings) are developed for fasteners which eliminate use of hazardous metals like chromium. Earlier the parts were zinc plated with either trivalent chrome or hexavalent chrome passivation.

Since the corrosion resistance of zinc flake coatings are much higher than zinc plated components, the life cycle has also much improved and replacements are fewer. Thus, sustainability is improved.

Smart Water Pump has been developed by which power consumption is reduced in Internal Combustion (IC) engine / Battery in Electrical Vehicle. Hard Hazardous Chemical/Metals like Cadmium, Mercury, Chromium, Radioactive Substance, Trichloroethylene, Poly-Brominated Biphenyls are not used in any of our products/process of water and oil pumps.

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

The Company had initiated the introduction of new quality system standard IATF 16949:2016, which replaces ISO/TS 16949:2009 and is in line with the revised ISO 9001:2015 Quality Management Standard (QMS) in all SFL plants that establishes the requirements for a QMS, specifically for the automotive sector. The Company has procedures in place for sustainable reporting. Some of the initiatives are given hereunder:-

- Constantly encourages the use of biodegradable / reusable materials for packing and storing of materials.
- Vehicles are permitted inside the factory, only if they comply with the pollution control norms.
- Specifically focussed on the storage, handling and disposal of hazardous chemicals.
- Specialised agencies are employed to treat the chemical wastes.
- Materials like oils, lubes, steel etc. are conserved and mainly focused to reduce loss and wastage and to maximize utilisation of materials.

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

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

Yes. The steps taken by the Company to improve the capacity and capability of local and small vendors are given hereunder:-

- Indigenization / localisation plans are given top priorities.
 - 100% indigenization achieved in raw materials and consumables buying.
 - Suppliers / Vendor meets and surveys are conducted, to receive feedback and to improve their processes and output.
 - Vendors contributing for the indigenization are awarded and encouraged.
 - Top priority of buying is given to the domestic sources for raw materials and consumables.
 - Extend technical and financial support to the local small vendors and sub-contractors.
 - A strong sub-contractors base has been created at various locations to support the manufacturing plants.
 - Total Quality Management (TQM) training was extended to sub-contractors to support them to manufacture and supply good high quality products to us.
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5. Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.

Yes. The Company has a mechanism to recycle products and waste. The recycling / re-usage of tools and consumables, maximizing the life of oils, lubes are part of manufacturing process on a routine basis. Since, most of the products manufactured by the Company are made out of steel, re-usage / recycling is done by melting and the scrap generated from products / processes are provided as inputs to the steel melting plants.

Principle 3: Businesses should promote the well-being of all employees

1. Please indicate the Total number of employees

3,311

2. Please indicate the Total number of employees hired on temporary / contractual / casual basis.

6,994

3. Please indicate the number of permanent women employees.

167

4. Please indicate the number of permanent employees with disabilities

4

5. Do you have an employee association that is recognized by management.

Yes

6. What percentage of your permanent employees is members of this recognized employee association?

1,298 (39%)

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.

S. No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
1	Child labour / forced labour / involuntary labour	-	-
2	Sexual harassment	-	-
3	Discriminatory employment	-	-

8. What percentage of your under-mentioned employees were given safety and skill upgradation training in the last year?

S. No.	Category	% of safety & skill upgradation training in the last year
1	Permanent Employees	100%
2	Permanent Women Employees	
3	Casual / Temporary / Contractual Employees	
4	Employees with Disabilities	

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Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.

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

Yes. The Company has mapped its internal and external stakeholders. It uses both formal and informal mechanisms to engage with various stakeholders to understand their concerns and expectations. Individual departments within the organisation have roles and responsibilities identified and defined to engage with various stakeholders.

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

Yes.

3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders? If so, provide details thereof, in about 50 words or so.

Please refer Page Nos. 34 to 36 (Annual Report on CSR Activities).

Principle 5: Businesses should respect and promote 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's Code of Conduct for Affirmative Action forming part of 'Code of Business Conduct and Ethics' and 'SFL's Policy on Sexual Harassment of Women at Workplace' cover the aspects of ensuring human rights.

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

One (100%)

Principle 6: Business should respect, protect, and make efforts to restore the environment

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

The company encourages employees as well as other stakeholders to actively participate in protecting / restoring environment. The company over the years has inculcated sustainable business practices through well-defined processes. Best practices are shared to all stakeholders as a part of horizontal deployment. The policy covers only the Company.

2. Does the company have strategies / initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.

Yes. The company has a well evolved structure for environmental conservation. All the units /plants have a vast area under green belt with natural flora and fauna. The company has been focusing on reducing its emissions from its operations which impact the environment. Water conservation is a key theme addressed by the top management with focus on reduction / recycling.

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

Yes. All the units of the company identify and assess potential environmental risks as a part of the ISO 14000 Environmental Management Systems (EMS) standard. Periodical review is done by top management on the steps taken to mitigate the potential risks identified.

4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?

The company has been in the fore front of utilising renewable energy for its units situated in Tamil Nadu, generating green power and feeding to its units through grid. In addition, wind energy is sourced through Group Captive arrangements.

Over the years, the share of wind energy has increased and in the year 2018-2019, the share of renewable wind energy amounted to 42% of total consumption of all its units in India.

Apart from wind energy the company is also sourcing power from bio mass plant to the tune of 3.4%, thus the total renewable energy consumption amounts to 46% of total energy consumed. This has resulted in a reduction equivalent to 97,900 MT of CO₂ during 2018-2019. The Company has also installed roof top solar power plants in its facilities. Further addition to solar power roof top capacity and sourcing of solar power from ground mounted solar plant is planned in the year 2019-20.

5. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y / N. If yes, please give hyperlink for web page etc.

The company has a continuous focus on conservation of energy. Targets in terms of sourcing mix and cost are set every year and action plans are drawn. Constant review is done by the top management and the audit committee on a quarterly basis. Energy conservation measures include energy savings, use of alternate sources of energy i.e. wind power, bio gas.

Apart from maximising renewable energy usage, energy conservation projects like:

1. Use of Energy Efficient LED lightings in all factory bays
 2. Optimising / eliminating / resizing cooling tower pumps
 3. Providing inter-lock arrangement to main motors so that idle running is eliminated.
 4. Installation of Variable Frequency Drives for various applications
 5. Optimising loading of air compressors and thus reducing their running time
 6. Providing waste heat recovery system in compressor so that waste heat is re-used for heating applications
 7. Providing timer for lighting controls
 8. Power factor improvement by adding capacitor bank
6. Are the Emissions / Waste generated by the company within the permissible limits given by CPCB / SPCB for the financial year being reported?

All the units of the company are in compliance with the prescribed norms of Central Pollution Control Board (CPCB) / State Pollution Control Board (SPCB) for Effluent discharge, Air Emissions, hazardous solid and liquid disposals.

7. 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.

Nil

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

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.

- a. Automotive Component Manufacturers Association of India
- b. Madras Chamber of Commerce & Industry
- c. The Confederation of Indian Industry

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

Yes. Representations have been made to Chambers of Commerce and industry associations on various matters for the improvement of regulatory policies.

Principle 8: Businesses should support inclusive growth and equitable development

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

Please refer Page Nos. 34 to 36 (Annual Report on CSR Activities).

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

CSR initiatives are undertaken both by the Company with its own resources as well as working in partnership with specialist organisations, NGOs. Please refer Page Nos. 34 to 36 (Annual Report on CSR Activities).

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

Yes, we do review the projects through field visits. Our factories also undergo Greenco certification assessment that assess and analyse the environmental impact of the company's activities or operations.

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

Please refer Page Nos. 34 to 36 (Annual Report on CSR Activities).

5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.

Please refer Page Nos. 34 to 36 (Annual Report on CSR Activities).

Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner

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

Nil

2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes / No / N.A. / Remarks (additional information)

Yes. As specified under Legal Metrology Act, 2009, Rules made thereunder and other applicable laws.

3. Is there any case 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. If so, provide details thereof, in about 50 words or so.

No

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

No.