

Business Responsibility Report

About this Report

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) prescribe that the top 500 listed entities based on market capitalisation as at the end of March of every financial year are required to include a Business Responsibility Report (BRR) as part of their Annual Report. The following report has been prepared in accordance with Regulation 34 of the Listing Regulations since the Company figures among the top 500 listed entities in India based on market capitalisation at the National Stock Exchange of India Limited (NSE) and the BSE Ltd (BSE) as at 31st March, 2019.

Section A: General Information about the Company

Sl. No.	Details	
1	Corporate Identity Number (CIN)	L35100TN2008PLC069496
2	Name of the Company	Tube Investments of India Limited
3	Registered office address	Dare House, 234 N S C Bose Road, Chennai – 600001
4	Website	www.tiindia.com
5	E-mail ID	investorservices@tii.murugappa.com
6	Financial Year reported	1 st April, 2018 to 31 st March, 2019
7	Sectors that the Company is engaged in (industrial activity code-wise)	a) Cycles and Accessories (NIC Code : 3092) b) Steel Strips and Tubes (NIC Code : 2431) c) Metal Formed Products (NIC : 2511)
8	List three key products/services that the Company manufactures/provides (as in balance sheet)	Cycles and Accessories, Steel Strips & Tubes and Metal Formed Products
9	Total number of locations where business activity is undertaken by the Company	
	a) Number of International Locations (Provide details of major 5)	There are no international manufacturing operations for the Company of its own. The Company has one step down subsidiary in France engaged in the manufacture of Industrial chains and two direct subsidiaries in Sri Lanka engaged in manufacture of bicycles and components.
	b) Number of National locations	The Company has manufacturing operations in 18 locations nationally (5 - Engineering; 2 – Bicycles; 11 – Metal Formed Products) .
10	Markets served by the Company— Local/State/National/ International	The Company predominantly serves the Indian market. The Company also has sizeable export of bicycles, tubes and industrial chains to other countries in Asia, Europe and the Americas.

Section B: Financial details of the Company

Sl. No.	Details	
1	Paid up Capital (INR)	₹18.77 Cr.
2	Total Turnover (INR)	₹4,983.05 Cr.
3	Total profit after taxes (INR)	₹243.51 Cr.
4	Total spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%)	₹2.69 Cr. 1.10%
5	List of activities in which expenditure in 4 above has been incurred	Education, Rural Sustainability & Healthcare (please refer the CSR Annual Report for details)

Section C: Other details

1. Does the Company have any Subsidiary company/companies?

Yes. The Company has 5 direct subsidiaries and 3 step down subsidiaries. [Of the same, 2 subsidiaries are located in India of which one is a listed subsidiary. The rest are located abroad].

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).

The Indian listed subsidiary (not in the top 500 companies based on market capitalisation as on 31st March, 2019) has its own BR initiatives. The other Indian subsidiary takes/would take part in the BR initiatives of the Company. The overseas subsidiaries carry out their BR initiatives in consonance with the prevailing requirements at their respective locations.

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%].

The Company does not mandate its suppliers and distributors to participate in its BR activities. However, they are encouraged to do so.

Section D: BR Information

1. Details of Director/Directors responsible for BR

Details	
a) Details of the Director/Director responsible for implementation of the BR policy/policies	
• DIN Number	01138759
• Name	Vellayan Subbiah
• Designation	Managing Director
b) Details of the BR head	
• DIN Number	01138759
• Name	Vellayan Subbiah
• Designation	Managing Director
• Telephone number	044-42286701
• Email ID	vellayans@tii.murugappa.com

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

The 9 areas of business responsibility enunciated under the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs) released by the Ministry of Corporate Affairs, Government of India are:

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

No.	Questions	P.1	P.2	P.3	P.4	P.5	P.6	P.7	P.8	P.9
1	Do you have policy/policies for....	Y	Y	Y	Y	Y	Y	Y	Y	Y
2	Has the policy been formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y	Y	Y	Y
3	Does the policy conform to any national/international standards? If yes, specify? (50 words)	Y	Y	Y	Y	Y	Y	Y	Y	Y
4	Has the policy been approved by the Board? Is yes, has it been signed by MD/owner/CEO/ appropriate Board Director?	Y	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	Y
6	Indicate the link for the policy to be viewed online?	http://www.tiindia.com/article/values/667								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	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	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	Y
10	Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	Y	Y	Y	Y	Y	Y	Y	Y	Y

The policies of the Company are based on its guiding principles and core values and are mapped to each of the principles hereunder:

Principle	Applicable Policies
Businesses should conduct and govern themselves with Ethics, Transparency and Accountability	<ul style="list-style-type: none"> Values and Beliefs, called the 'Five Lights' Whistle Blower Policy TII Code of Conduct
Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle	<ul style="list-style-type: none"> Safety, Health and Environmental Policy Total Quality Management (TQM) & Toyota Production System (TPS) practices
Businesses should promote the well-being of all employees	<ul style="list-style-type: none"> Safety, Health and Environmental Policy Policy on prevention of Sexual Harassment at the work place
Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalised	<ul style="list-style-type: none"> CSR Policy
Businesses should respect and promote human rights	<ul style="list-style-type: none"> Values and Beliefs, called the 'Five Lights' Whistle Blower Policy Code of Conduct
Business should respect, protect and make efforts to restore the environment	<ul style="list-style-type: none"> Safety, Health and Environmental Policy
Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner	<ul style="list-style-type: none"> Values and Beliefs, called the 'Five Lights'
Businesses should support inclusive growth and equitable development	<ul style="list-style-type: none"> CSR Policy
Businesses should engage with and provide value to their customers and consumers in a responsible manner	<ul style="list-style-type: none"> Values and Beliefs, called the 'Five Lights' Total Quality Management (TQM) and Toyota Production System (TPS) practices

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

Not applicable.

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 BR performance revolves around a number of policies which is assessed by the BR Head monthly, quarterly and annually based upon its importance and impact on the Company's operations and activities.

- **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 Company publishes a BR Report as part of its Annual Report. The said Report is also available in the Company's website at www.tiindia.com/articles/values/677.

Section E: Principle-wise Performance

Principle 1 – Ethics, Transparency & Accountability

The Company is committed to developing governance structures, procedures and practices that ensure ethical conduct at all levels; and promoting the adoption of this principle across its value chain. Commitment to ethical and lawful business conduct is a fundamental shared value of the Board of Directors, senior management and all employees of the Company.

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's policies relating to Governance rest on adhering to ethics, transparency in dealing with stakeholders, adequate and timely disclosure etc. These policies are similar across all the entities in the Group. All stakeholders of the Company - internal as well as external are expected to work within the framework of the aforesaid policies/principles. In the selection of its vendors and contractors, the Company ensures to identify and deal with those who can maintain and follow ethical standards. The Company further on a regular basis endeavours to reiterate awareness and also impart training on these values to its employees. The relevant stakeholders of the Company are also made aware of the said values from time to time.

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 set up a Whistle-blower mechanism as an avenue for voicing of concerns *inter alia* relating to unethical

behavior. During the year, there were no complaints under the Company's Whistle Blower policy. There were four complaints from stakeholders (viz., shareholders) under the Stakeholders Relationship Committee established for voicing of grievances/issues by investors, all of which were promptly resolved. There were no complaints pending as at 31st March, 2019.

Principle 2 - Safety and sustainability of goods & services

The Company undertakes to assure safety and optimal resource use over the life-cycle of its products. Efforts will be made to ensure that everyone connected with it be it designers, producers, value chain members, customers and recyclers are made aware of their responsibilities.

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

Steel Tubes

The Company has developed a number of steel tubes which are used in safety critical applications by the automotive industry. Some of the Company's products are import substitutes, enabling conservation of foreign currency. The Company caters to the requirements of infrastructure industry by providing products for off-road vehicles.

Industrial/Automotive Chains

The Company has developed industrial chains that are used in elevators, escalators and travellators used in the country's infrastructure development projects.

Bicycles

The Company, being conscious that bicycle is a common mode of transport for certain sections of the public, strives to develop new models/products which are affordable and durable. The Company is also developing number of new models catering to the health and leisure segment of the bicycle users.

The Company has strong focus on managing and reducing its energy, water and waste footprint, and is in constant lookout for improvement opportunities. Some interventions taken in this regard include implementation of ISO 14001 and OHSAS 18001 standardisation systems, reducing overall dependence on direct fuel consumption at our operational sites. All these efforts have allowed us to improve upon our resource use efficiency.

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

–

3. Does the Company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably?

Yes. Vendors/service providers are encouraged to adopt management practices detailed under the international standards such as ISO 9001, ISO 14001, OHSAS 18001 and Company's Environment, Health and Safety (EHS) Guidelines. The Company's integrated operations ensure sustainable exploitation of the available resources. Joint project opportunities amongst various business units improve efficiencies in sourcing besides resulting in product efficiencies. Conscious efforts are made to ensure that everyone connected with the Company be it the designers, producers, value chain members, customers and recyclers are made aware of their responsibilities. The Company is continuously focused on internal improvements which helps in achieving operational efficiencies also resulting in energy conservation and sustainable operations. Usage of materials which are either recycled or capable of recycling assumes top priority.

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?

The Company has developed a vendor base around many of its manufacturing locations. Capability building is the primary focus of the Company's vendor development and management process. The Company recognises the importance of its vendor base and continuously monitors the financial health and business practices of the same.

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.

The Company has sustainable processes in place to recycle the products and waste, post completion of manufacturing life cycle.

Principle 3 - Promotion of well-being of employees

The Company ensures a work environment that promotes well-being of all its employees. Focusing on health, safety and preventing discrimination are part of the Company's guiding principles on employees' well-being.

1	Please indicate the total number of employees	3,253
2	Please indicate the total number of employees hired on temporary/contractual/casual basis	8,880
3	Please indicate the number of permanent women employees	74
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?	52.03%
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.	Nil
8	What safety & skill up-gradation training was provided in the last year?	<p><u>Safety:</u> Safety Induction General Awareness on Safety Usage of Personal Protective Equipment (PPE) & Equipment Handling Video Based Training Handling Firefighting equipment SHE policy awareness 5S training Traffic safety Safety Survey conducted at 14 locations and the findings are being taken for corrective actions</p> <p><u>Skill:</u> Class room training On the job training</p>
	• Permanent employees (includes women employees and employees with disabilities)	95.93%
	• Casual/Temporary/Contractual Employees	89.22%

Principle 4 - Responsiveness towards stakeholders

The Company is responsive to the requirements of all its Stakeholders and this is enshrined in its Corporate Values & Beliefs of Integrity, Passion, Quality, Respect and Responsibility. These values require that the Company act as a responsible corporate citizen and change lives for the better and this is to be done in a manner that reflects humility. The Company considers its employees, business associates, suppliers, stockists, dealers, customers, shareholders/investors and communities surrounding its operations and regulatory authorities as its key stakeholders. The Company continues its engagement with them through various mechanisms such as consultations with local communities, supplier/vendor meetings, customer/employee engagement surveys, investor forums, etc. The Company's website, www.tiindia.com provides comprehensive information to the stakeholders about the Company.

1. Has the Company mapped its internal and external stakeholders?

Yes. The Company has mapped its internal and external stakeholders.

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

The Company identifies underprivileged communities around its business locations as disadvantaged, vulnerable and marginalised stakeholders and continuously engages with all such stakeholders identifying their needs and priorities so as to serve these needs accordingly. The systems and processes are in place to systematically identify stakeholders and for understanding their concerns and for engaging with them are reviewed from time to time.

3. Are there any special initiatives taken by the Company to engage with the disadvantaged, vulnerable and marginalised stakeholders.

The Company on a periodical basis undertakes dedicated activities as a part of its CSR initiatives for the disadvantaged, vulnerable and marginalised stakeholders in and around the Company's factories/plants. Education, sports and health aids are provided to schools in rural/under-developed areas and to schools supporting differently abled children. The Company acknowledges the importance of skill development in this competitive environment and has set up the Basic Training Center (BTC) at the Avadi Complex of Tube Products of India, a division of the Company, with the motto of developing technical skills amongst indigent students. The BTC will provide a skill bank of a technically competent and industry ready work force drawn from socially and

economically backward sections of the society. All the fifty students of the BTC who appeared for the All India Trade Test for the National Apprentice Certificate during 2018 found suitable placements in various organisations. The Company also pursues other local community assistance programmes in and around its plants' and office locations.

Principle 5 - Promoting human rights

The Company respects the rights and dignity of all individuals and upholds the principles of human rights. The Company's commitment to human rights and fair treatment is set out in its Code of Conduct and the Five Principles governing the Group. The policy provides conduct of operations with honesty, integrity and openness with respect for human rights and interests of employees. The Company believes that a sustainable organisation rests on a foundation of ethics and respect for 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 policy of the Company on human rights is enshrined in the values represented in the Five Lights guiding the Company, its Group companies and their employees across all spheres. The alignment with this value system is expected out of any person dealing with the Company.

The Company's Policy on Human Rights covers not only the Company but extends to its subsidiaries. The Company encourages its suppliers, contractors and others to follow the principles laid down in the five principles of its values and beliefs.

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

No complaint pertaining to violation of human rights was received during the financial year ended 31st March, 2019.

Principle 6 - Protecting the environment

The Company takes responsibility for and accords the highest value to the protection of the environment. Accordingly, the best practices and procedures relating to environment protection are followed by all the factories of the Company. The Company strives to promote ecological sustainability and green initiatives by adopting energy saving mechanism and sensitising employees to reduce carbon foot print of the Company.

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

Sustainability is an important element of the Company's business processes. The Company encourages all its stakeholders to follow environment-friendly processes.

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.

As a manufacturing company, necessary mechanisms have been set up for ensuring compliance with the laws on environment. mechanisms in place to ensure compliance with the applicable environmental laws. The Company is committed to be an environment friendly organisation and has a dedicated Environmental Policy across all its business units. The Company is an active player in practicing initiatives to address environmental issues and ensuring sustainable development. Almost all locations of the Company have received the ISO 14001 certificate for their Environment Management Systems and ISO 9001 for Quality Management Systems. All factories of the Company have a green belt around the plant. Other than these, the Company does not have any initiative to address global environmental issues.

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

Yes. The Company does have a mechanism to identify and assess potential environmental risks in its plants, projects and operations. Environmental risk identification and mitigation is ingrained in the Company's risk management system.

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?

No, the Company has not undertaken any specific project related to the Clean Development Mechanism as per the Kyoto Protocol. However, all the manufacturing locations of the Company are certified ISO 14001 (Environment Management System), QMS-ISO 9001 (Quality Management System), OSHAS – 18001.

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 utilises its resources in an optimal and responsible manner ensuring sustainability through reduction, re-use, re-cycling and managing waste. Continuous efforts are on to improve energy efficiency in every sphere of Company's operations. Appropriate measures to check and prevent pollution are undertaken. The Company seeks to improve its environmental performance by adopting cleaner production methods, promotion of energy efficient and environmental friendly technologies. Suitable processes and systems are

developed with contingency plans and processes that help in preventing, mitigating and controlling environmental damages caused due to the Company's operations.

6. Are the emissions/wastes generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?

All businesses of the Company are engaged in manufacturing activity. Accordingly, it is being ensured that the emissions/wastes being generated through such activities are in compliance with the applicable environmental laws. The Company's policy on environment and the ISO-14001 certification of its facilities emphasises on its commitment to be an environment friendly organisation setting standards in environment management.

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.

No show cause/legal notices were received from CPCB/SPCB during the financial year.

Principle 7- Responsibility towards public and regulatory policy

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) Confederation of Indian Industry
- (b) Southern India Chamber of Commerce & Industry
- (c) Madras Management Association
- (d) All India Cycle Manufacturers' Association
- (e) Employers Federation of Southern India
- (f) Federation of Indian Chamber of Commerce and Industry

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, Water, Food Security, Sustainable Business Principles, others)

Yes. While the Company is not actively involved in lobbying, as a responsible corporate citizen, the Company as a part of major industry associations/chambers makes recommendations/representations before regulators and associations for advancement and improvement of industrial climate in India.

The Company also represents its views/opinions on energy security, economic reforms, governance etc.

Principle 8 – Supporting inclusive growth and development

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

Yes. Please refer to the CSR Annual Report for the financial year ended 31st March, 2019.

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

For the financial year, 2018-19, while certain budgeted CSR initiatives were implemented directly by the Company with in-house support, for projects requiring specialised experience and expertise for execution, implementing agencies were also involved.

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

All CSR initiatives are supported by an Impact assessment to ensure that they reach the community intended and positively impact the life of those.

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

Please refer to the CSR Annual Report of the Board's Report for the FY 2018-19 for details of the direct contribution made by the Company during the financial year ended 31st March, 2019.

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.

Initiatives are identified based on the requirement of the community such that the benefits out of them are of an enduring nature. – Please refer to the CSR Annual Report for the financial year ended 31st March, 2019.

Principle 9 – Providing value to customers & consumers

The Company firmly believes in being a quality and customer centric organisation offering products/goods of genuine value to all its discerning customers that meets with their expectations every time. The products/goods of

the Company undergo several quality checks at every level of the production process chain. Well-defined Standard Operating Procedures (SOPs) and processes aid in identifying and eradicating process/system impediments. The Company's overall approach on this aspect is guided by its quality policy and Total Quality Management (TQM) & Toyota Production System (TPS) practices.

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

Pending customer complaints/consumer cases constitute a very meager percentage (less than 1%) as at the end of 31st March, 2019. Proactive steps are being taken to resolve the same at the earliest.

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. The Company displays product information on all product/goods of the Company in accordance with the Legal Metrology Act, 2011 and the applicable Rules thereunder/ other laws. In addition, wherever it is considered relevant and appropriate for facilitating better usage of the product/goods by the customer, additional information about the products/goods, the use and the mode of handling thereof are also provided.

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. If so, provide details thereof, in about 50 words or so

There have been no cases relating to unfair trade practices, irresponsible advertising and/or anti-competitive behavior against the Company.

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

Yes. The Company carries out periodical consumer surveys and mapping of customer satisfaction trends. The results of these activities are considered and utilised as effective business strategy tools to better understand the customers and their needs.