



R Mukundan
Managing Director

08th July 2009

Dear Mr.Kell,

**Sub: UN Global Compact Communication on progress
For the year 2008-09**

In response to your email communication dated 14th June 2009, recommending Tata Chemicals to prepare and submit the United Nations Global Compact Communication on progress report for the year 2008-09, we are pleased to submit the attached document as per the guidelines prescribed.

Tata Chemicals as a responsible corporate, is committed to the principles of Global Compact initiative. These principles are also part of our Vision, Mission and Policies.

We will continue to produce COP in future also.

With best regards,

Yours sincerely,



(R. Mukundan)

Encl. : As above

Mr. George Kell
Executive Head of the Global Compact
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UN Global Compact – Communication on Progress (CoP) – 2008-09

Global Compact Principles	Company's Policy & Direction	Specific actions taken during the current financial year	Outcomes with key Results & Measurements
Human Rights:			
<p>Principle 1: Business should support and respect the protection of internationally proclaimed human rights.</p>	<p>1) Company follows Principles of the International Declaration of Human Rights. Its policies support, respect and protect the Human rights of its direct as well as indirect employees. The sustainability Policy addresses these aspects.</p> <p>2)TCL has defined and documented policy on Social Accountability and is committed to comply with the requirements of the internationally recognized SA 8000 standard</p>	<p>1) Company policies and guidelines ensure human rights compliance all across. Grievance Redressal Cell & Help Desk, on Company's intranet service, addresses issues related to its employees, resulting into higher satisfaction. Programs such as "Aawaz", help employees across levels to sit together to and resolve concerns and put forth improvement plans.</p> <p>2) The company has established SA 8000 compliant management systems at all its 3 manufacturing sites in India which included documentation, training and creating awareness, compliance with SA 8000 requirements, internal audits and reviews during the year.</p> <p>3) TCL is signatory to CEO statement on the 60th Anniversary of the Universal Declaration of the Human Rights</p>	<p>1) Overall Employee Satisfaction is at 76% (2008-09). For management Cadre increased from 74% to 82% & for Non Management dropped from 71% to 62 % over the previous year. Necessary action plans have been prepared and being implemented.</p> <p>2) All the three manufacturing sites at Babrala, Haldia and Mithapur have been awarded the SA 8000 certification by the Italian accredited certifying body M/s. RINA .</p>

<p>Principle 2: Business should ensure that they are not complicit in human right abuses.</p>	<p>1) Company has Corporate Sustainability, SHE policy, Quality policy, Environment Policy, Community Development Policy, Food Safety Policy and Cardinal Rules of Safety.</p>	<p>1) To monitor the compliance to the objectives of the policies, the company has established well-documented systems of record keeping, process of internal auditing, corrective and preventive action planning and reviewing the progress on regular basis. Third party surveillance audit validates this system and Management Committee reviews results of the third party audit</p>	<p>1.1) Company's Fertilizer plant at Babrala has been awarded with Sword of Honour by British Safety Council consecutively for four times, where as the Chemical plant at Mithapur has been awarded with British Safety Council 5 Star rating for its Safety Management System. Babrala Plant has also been awarded with British Safety Council 5 Star rating for its Environmental Sustainability Management System three times in a row (2005-07). Haldia plant has been awarded with 5 star rating by British Safety Council in environmental management in 2007.</p>																
			<p>1.2) Company's chemical's all locations are certified with ISO 9001, ISO 14001 and OHSAS 18001 and Mithapur site has implemented HACCP systems (Hazard Analysis Critical Control points for Bicarb plant.</p>																
			<p>1 .3) Through effective SHE Training and better implementation of safety practices the company's safety performance has improved significantly.</p> <p>Total recordable Injuries per million man hours worked.</p> <table border="1" data-bbox="1470 941 2028 1175"> <thead> <tr> <th>Year</th> <th>Babrala</th> <th>Haldia</th> <th>Mithapur</th> </tr> </thead> <tbody> <tr> <td>2006-07</td> <td>0.93</td> <td>1.09</td> <td>2.62</td> </tr> <tr> <td>2007-08</td> <td>0.31</td> <td>1.38</td> <td>3.79</td> </tr> <tr> <td>2008-09</td> <td>0.00</td> <td>0.994</td> <td>1.66</td> </tr> </tbody> </table>	Year	Babrala	Haldia	Mithapur	2006-07	0.93	1.09	2.62	2007-08	0.31	1.38	3.79	2008-09	0.00	0.994	1.66
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	2)Anti Sexual Harassment Policy	2) A sexual harassment redressal mechanism has been established which includes a redressal committee chaired by a women employee. Most of the management cadre employee and employees that are in direct contact with employees such as HR, Personnel, security etc. have participated in gender sensitization workshops	2.1) Employees sensitized to the right of women to have a safe and secure work environment. Action taken as appropriate where concerns were raised. Total concerns raised since two years : 5, leading to action in two cases, counseling in two and one concern was rejected after investigation
	3) Tata Code of Conduct (T-COC) ensure Human Rights compliance across the Organization	3.1) In line with Tata group of attaining Leadership With Trust, all Tata group companies has institutionalized Tata Code of Conduct guiding clauses, and adopted the said code across the companies. All employees have been imparted training and awareness to thoroughly understand expected ethical behaviour. Company is also having T-COC Grievance Redressal Mechanism and Ethics counselor to address the raised issues.	3.1) In the reporting period, all concerns raised were processed for proper closure.(For all the 25 Clauses of T-COC) (Refer actions under principle 10) 3.2) Commitment of the senior team in the acquired companies to abide by the TCoC.
LABOUR STANDARDS			

<p>Principle 3: Business should uphold the freedom of association and the effective recognition of the right to collective bargaining</p>	<p>1) The company abides by the Indian Factory Act and all the Indian Labour Laws; these laws are in- onformance to the ILO. Company has recognized Trade unions and Staff unions for bargain able category of workmen and supervisory staff.</p> <p>1.1) Company also constitutes various committees and councils having equal participation from management as well as elected workmen representatives to discuss and resolve various issues related to operations.</p> <p>1.2) Company has periodic dialogues and negotiations with the recognized workmen and staff trade unions to discuss and settle the charter of demand amicably.</p> <p>2) This is also a requirement under the SA 8000 standard to which TCL is committed.</p>	<p>1.1) Mithapur and Haldia plants have workmen as well as staff unions as per Trade Union Act –1926 and other relevant laws. At Fertilizer plant at Babrala, a single supervisory staff union represents all supervisor staff. Employees are free to join Trade Union of their choice. Every threeyears election process identifies one union, which is to be recognized by the company under the supervision of Government authority.</p> <p>1.2) Joint committees like JointManagement Council and CanteenManagement Committee with therepresentatives from Management and worker cadres are active to resolve the issues.</p> <p>1.3) Company has Specific Executives and Personnel Department to deal with all matters related to Unions. All the decisions are discussed with Committees and with the Staff union prior to its implementation.</p> <p>2) Compliance to this requirement was audited by external auditors from M/s RINA during their audit for SA 8000.</p>	<p>1.1) Company's chemical plant has 2 unions with 65% workers in Tata Chemicals skilled mazdoor sangh and 35% workers with Chemicals Kamdar sangh. Haldia plant has 1 recognized Trade Union for workers with 100% of employees as members. This union is registered as per "Section 4 of Trade Union Act – 1926".</p> <p>1.2) At chemical plant there were 14 meetings of these two committees While fertilizer plant at Haldia had 12 meetings and Babrala had 4 meetings of CMC.</p> <p>1.3) In the reporting period there were no unresolved grievances pending with the Grievance Redressal Cell</p> <p>2) Auditors from M/s. RINA confirmed TCL's compliance to recognize and uphold the freedom of collective bargaining.</p>
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<p>Principle 4: Business should support the elimination of all forms of forced and compulsory labour.</p>	<p>1)The company abides by the Indian Government laws on elimination of all forms for forced or compulsory labour.</p> <p>2) The company also adheres to relevant provisions of Indian Factories Act and Industrial Disputes Act which ensures labour health, safety, welfare and labour rights.</p>	<p>1)The company's internal audit mechanism, periodic third party audit along with regular inspection by the government labor ministry authorities helps company to validate the adherence.</p> <p>2) Company through its regularcommunication and periodic audit communicates and verifies the adherence of this stipulation from their suppliers, contractors and channel partners.</p>	<p>In the reporting period no violations or complaints have been reported.</p>
<p>Principle 5: Business should support the effective abolition of child labor</p>	<p>1) Indian labor laws prevent recruitment of child labor at industrial premises. Company policies and Recruitment process are in alignment with labor laws as well as "ILO Convention 138" and ensures the compliance with all applicable laws</p> <p>2) T-COC and Relevant labor laws are applicable to local contractors, service providers, suppliers and channel partners as well.</p>	<p>1.1) Document of age proof as well medical examination by industrial physician is mandatory to ensure the compliance of stated rule.</p> <p>1.2) The general condition of purchase contract and agreement stipulates the strict adherence to the compliance of all labor laws including non-engagement of child labor.</p> <p>2.1) All supply contracts up and down the supply chain include a clause emphasizing on non-engagement of child labor, directly or indirectly. Company's vendor selection and registration and evaluation process ensures and verifies the adherence to the conditions of contract.</p>	<p>There is 100% compliance to the planned scheduled calendar for company's senior officer's contact meeting with channel partner, distributors, dealers, suppliers and contractors for communicating and reinforcing.</p>
<p>Principle 6: Business should support the elimination of discrimination in respect of employment and occupation</p>	<p>1) Company policy on hiring new employees emphasizes the aspects of "Equal Opportunity Employer" and complies with Clause - 4 of T-COC.</p>	<p>1) As per the company's recruitment policy, applicants are not discriminated on the basis of gender, race, caste, religion, social status or physical disability. During the year, the organization has employed female candidates on permanent as well as on</p>	<p>1) During the reporting period 15 new female recruitments were: • Corporate office - 9• Mithapur Plant - 1 • Babrala plant - 1 • Haldia Plant. – 2• Noida Office - 1New recruitment of One differently abled candidate at Haldia during the reporting period. Total of 23 differently abled employees are giving service</p>

	<p>2) Affirmative action is exercised in the case of physically challenged and socially and economically persons, who are preferred by the organization provided the candidate meets the company's competency requirements.</p>	<p>training basis to show the commitment towards non-discrimination. The organization has also employed differently abled persons as per the required fit.</p> <p>2) The Sexual - Harassment redressal committee proactively took up gender sensitization programs across locations, through presentations and films.</p>	<p>to the organization.70% management Cadre employees were covered under gender sensitization program. All new recruits inclusive of Management trainees undergo a half day gender sensitization workshop/ presentation</p>
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ENVIRONMENTAL PERFORMANCE:**Principle 7:**

Business should support precautionary approach to Environmental Challenge

1) A robust environmental management system has been established at all three manufacturing locations in the country. A legal compliance management system has also been established, which ensures compliance of all environmental laws and regulations. The EMS addresses the precautionary approach to all future environmental challenges and threats like Climate change, resource depletion and conservation of natural resources etc.

2) Corporate policy on environment, health and safety provides all direction to deploy best environmental practices.

3) Enterprise wise process on Environment, Health and Safety management system has been established, which directs the common processes at all locations.

1) All locations have been certified to global standards like EMS ISO: 14001 (2004) and OHSAS: 18001 (2007) standards.- Internal and external environmental audits have been scheduled to ensure the implementation of effective EMS. Findings of audits have been reviewed with Sr. management for improvements and for setting objectives and targets in EMS. Compliance

2) An e-enabled compliance management system driven by corporate ensures all legal compliance across the company under prevailing environmental laws in the country.

3) The company has established enterprise wide risk management process, which includes process risk assessment and process hazard analysis.

4) Feasibility studies for setting up Customized Fertilizer plant, expansion of Babrala plant and Water filter plant at Haldia has been done to include all important aspects of Environment management.

5) Company has taken initiatives to combat climate change by establishing a Climate change Cell, which drives various activities like awareness on Climate change,

1) Audits against each of the management systems have been conducted by certifying agency to ensure the effective implementation of management system. There was no non-conformance against any requirement under the standards. Opportunities for improvements have been identified and action plans at each location has been developed for improvements. Objectives and targets for reduction in resource conservation, emissions and discharges has been set, which has been reviewed by senior leaders.

2) All compliance to the environmental monitoring schedule has been achieved. Compliance against all environmental statute's are met with and compliance reports have been submitted to the concerned authorities as per requirement. E-enabled compliance management system supports communication of all compliances to the Board as required under Clause 49 Listing Agreement signed by the Company under Indian Securities laws

3) Activity based hazards identification procedure has been reviewed to make it more effective considering all associated risks in the processes at all locations.

4) Environment clearance for Customized fertilizer plant and Terms of references for Babrala expansion has been obtained from Ministry of Environment & Forests.

5) Many awareness programmes on climate change and other global environmental issues have been conducted during the year. Carbon footprint assessment for all three

		<p>assessment of Carbon Footprint, identifying and monitoring of CDM projects and is member of the Tata Group Climate Change Committee and have done the Carbon Footprint Assessment for its operations.</p> <p>6) Company has strengthened its responsible care management practices for distribution and product stewardship and Security codes.</p> <p>7) Corporate Green manufacturing Index has also been established considering critical environmental performance indicators on resource conservation and climate change. Each location has taken a target for reduction in emissions and conservation of natural resources.</p>	<p>manufacturing sites has been completed by an external agency M/S Ernst & Young. Carbon foot print (Scope-1) in tCO₂e Babrala – 595038, Haldia: 62656 Mithapur: 1784191 (Total -2441885 tCO₂e)</p> <p>6) Tata Chemicals is a signatory to Responsible Care and provided support to Indian Chemical Council for training and awareness to industries across the country.- Company's representatives have participated in training programmes, workshops and Seminars on Responsible care as Trainer and Faculties in each programme conducted for South, West and Eastern region by Indian Chemical Council Babrala unit has been certified for Responsible Care - 14001</p> <p>7) Green manufacturing index has been reviewed in the corporate Executive committee and necessary actions have been taken for further improvements.</p>
<p>Principle 8: Business should undertake initiatives to promote greater environmental responsibility</p>	<p>Company's vision, mission and policies are the principle guiding directives and help to promote greater environmental responsibility. Some initiatives which are world class standards are driven from corporate level to promote and support greater environmental responsibilities and achieve higher environmental performance excellence at all</p>	<p>1) Company is having well established Environment Management System as per ISO 14001-2004 standard.</p> <p>2) Tata Chemicals is a signatory to Responsible Care and provided support to Indian Chemical Council and Alkali Manufacturer's Association of India for training and awareness to industries across the</p>	<p>1) Audited by the external agency twice in a year and certified for ISO 14001-2004.</p> <p>2) Company's representatives have participated in training programmes, workshops and Seminars on Responsible care as Trainer and Faculties in each programme conducted for South, West and Eastern region by Indian Chemicals Council</p>

	<p>manufacturing sites, and supply chain management.</p> <p>Tata Code of conduct directs to comply all environmental legal requirement and resource conservation while Corporate policy on "Sustainability, Responsible care and Safety Health and Environment" provide guidance on environmental performance excellence.</p> <p>Company is active member of TERI-CoRE corporate roundtable for environment in India which is associated with World Business Council of Sustainable Development.</p> <p>Company is signatory to Indian Chemical Council's Responsible Care initiative and to Confederation of Indian industries on "Mission on Sustainable growth".</p>	<p>country.</p> <p>2.1) Babrala site has established a certified RC-14001 management system which provides a structured and focused approach on Green supply chain management to prevent environmental & safety aspect of logistics and a life cycle approach on product stewardship.</p> <p>2.2) Company has improved its performance for the codes of Responsible care by strengthening its management practices</p> <p>3) Tata Chemicals has also adopted the world class guidelines on Occupational Health, Safety and Environment Management guidelines of British Safety Council, UK.</p> <p>4) The company is responsible for "Corporate Responsibility for Environment Protection" (CREP) and</p>	<p>2.1) Under Distribution and Product Stewardship codes of practices, Training and awareness programmes have been conducted for Distributors, Dealers, Retailers and Customers.- Environment Impact of product distribution and use under project "Green Supply chain" has been initiated.- Center for Agri solution and Technology has been established for Crop Nutrition business, which provides solutions and recommendations for optimum fertilizers to control the excessive fertilizer application to avoid soil pollution.- Suppliers, Dealers and Retailers meet organized for all sites to communicate about Responsible Care and to adopt best SHE practices in their processes and practices.- Company has been awarded use of Responsible Care logo.</p> <p>2.2) Implementation of Responsible Care has been assessed to achieve practice at place for all codes of practices at all sites to measure the scores under each code. The steering committee reviews the RC performance twice in a year. The average scores of six codes of practices during the reporting year at each locations were:</p> <p>Babrala: 97.2% Mithapur: 94.0% Haldia: 80.3%</p> <p>3) Babrala and Haldia sites have been awarded Five Star rating by British Safety Council, UK and have improved its EMS performance by adopting life cycle approach. Babrala and Mithapur sites have also won the Safety SWORD from British Safety Council UK.</p> <p>4) Annual progress reports on CREP implementations at all sites are submitted to the nodal agencies.</p>
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		<p>thus the company submits compliance reports for the action plans that were committed under volunteer standards.</p> <p>5) The company institutionalized no. of initiatives like Green Manufacturing Index, Responsible Care and sustainability reporting as per GRI guidelines through Corporate Sustainability Report.</p> <p>6) The company has established strong communication mechanism to create awareness and communication on safety health and environment performance among its stakeholders.</p> <p>8) Objectives and targets are set in the beginning of the year to conserve natural resources and reduce pollution loads. At source treatment, recycle and reuse philosophy is adopted to conserve and minimize the resource consumption.</p>	<p>5) Company is in its 4th cycle of Internal reporting of CSR and initiated the process of Stakeholder engagement. Corporate level Green measures were implemented to monitor the reduction in emissions and conservation of natural resources. Corporate Sustainability Report for 2006-08 has gone under assurance process through third party.</p> <p>6) Awareness program for suppliers, dealers and customers have been conducted to consider all EHS aspects in their processes and practices. Suppliers and other Vendor selection process include their SHE performance and practices. Key communities were invited to the manufacturing plants to show company's focus on safe operations and readiness on emergency preparedness.</p> <p>7) Community awareness on EHS aspects and their participation during emergency situation were conducted. Trained SHE champions in community.</p> <p>8) At Babrala specific water consumption was 5.10 M3 / MT of Urea which is a benchmark in fertilizer industry, against stipulated standards of 8-12m3/tonne of product.- Water harvesting project at Babrala site was commissioned to harvest approximately 50,000 M3 of rain water. At Mithapur ground water consumption has been brought to Zero.</p> <p>At Haldia In 2008-09, total raw water consumption (Ground water + PHE) has been reduced by 29% and % dependency on ground water resources</p>
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			<p>reduced by 69% with respect to 2007-08. Company's phosphate fertilizer production is complete internal recycling plant in terms of water with zero discharge of effluent.</p> <p>8.2) The Fly ash generation from the Power plant of Chemical unit at Mithapur is used as a substrate to grow plants and to help reclaim the wasteland. Malaria Green Cap project helped increased use of fly ash for plantation. In the reporting year the area under the project increased.</p> <p>8.2) Fly ash generated in power plant as waste and high salts in effluents is also used in Cement manufacturing.</p> <p>8.3) Phosphate unit of Haldia plant has set up Gypsum pond for recovery and reuse of Gypsum prior to final discharge of effluent. Gypsum is disposed off to the Cement manufacturers to use as their raw material.</p>
<p>Principle 9;</p> <p>Business should encourage the development and diffusion of environmentally friendly technology</p>	<p>As a commitment to continuous improvement of the environmental performance, it is company's objective to minimize the quantity of waste generation and energy consumption from the processes by installing eco-friendly technology, or by increasing the use of renewable source of energy. Company will develop and use eco-friendly technology for safe production, transportation use and disposal of products. Company shall extend knowledge by conducting or supporting research on the Health, safety and Environmental effects of our products, processes and waste materials Company is</p>	<p>1) Company uses Solar energy at its salt works. To conserve natural non renewable resources.</p> <p>2) Effluent Solid Filtration Plant at the chemical unit is installed to recover the solids from the Soda ash Effluent generated and to use the solids in Cement manufacturing.</p> <p>3) Conservation of non-renewable natural resources through replacing them by renewable resources as fuel and source of power has been considered.</p>	<p>1) While producing close to 1,958,922 tonnes of solar salt from salt works, in the year 08-09, the company utilized renewable solar energy to evaporate 97,946,100 KL of sea water. Thus utilized solar energy equivalent to energy available from 14,825,441 tonnes of coal.</p> <p>2)) Solids (recovered form ESF plant) used for Cement manufacturing in the year 2008- 09 was 38,853 tonnes compared to 17,476 tonnes in 2007-08.</p> <p>3) Fuel oil has been replaced by Bio-mass (Rice husk or straw) as fuel for hot air generator for DAP-1 plant at Haldia. In the reporting year this has been done partially but will be increased step by step. As an initiative to use renewable energy, the Urea plant at Babrala has provided solar geysers in its township. Also through TCSR, solar cookers and lanterns are provided to the local community. Biogas plant is also setup by TCSR.</p>

	<p>committed to work with others to resolve problems created by past handling and disposal of hazardous substances</p> <p>Tata Chemicals has set up a R&D centre at PUNE and a "Centre for Agriculture Technology" at Aligarh (UP) to develop new technologies for green products.</p> <p>Company has also established an Innovation Centre at Pune (Maharashtra), which is working on development of products based on GREEN Chemistry.</p>	<p>4) Production of fuel from renewable resources has been initiated to contribute in conservation of non-renewable natural resources.</p> <p>5) Green Chemistry principles to address the environmental issues</p> <p>6) Innovation centre has been established, which is working on developing new green/nano technologies.</p> <p>7) Knowledge management system has been implemented at all sites, which taps all innovative ideas to improve the organization environmental performance.</p> <p>8) Suggestion scheme is established at all locations to capture the innovative ideas of employees.</p> <p>9) Technological renovation is considered for improving the environmental performance by reducing waste generations.</p>	<p>4) A Bio-ethanol manufacturing plant has been set-up which will start production in 2009-10. Work on Biodiesel Feedstock Assessment started.</p> <p>5) Increased waste recycling reduced specific raw material consumptions and shifting towards eco-friendly processes etc.</p> <p>5.1) Reclamation of Solid wastes dumps, manufacturing of Bricks by using Solids and Fly ash, use of fly ash + lime grit for building bunds for etc.,</p> <p>5.2) Central Building Research Institute, Roorkee has recommended a proper mix of Fly ash and Lime grit for using as Bund building materials.</p> <p>9) One innovative project of utilization of flue gas from power plant to neutralize the effluent has been implemented at Babrala and in continuous use to conserve acid used for neutralization.</p> <p>5.3) Phosphoric Acid Manufacturing process is under up-gradation with Central Preyon Process, a hemi-hydrate process which will generate better mineral quality dry gypsum as a by-product and reducing the effluent generation.</p>
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ANTI CORRUPTION AND PREVENTION OF BRIBERY			
<p>Principle 10:</p> <p>Business should work against corruption in all its forms, including extortion and bribery</p>	<p>Tata Code of conduct has been established in the company, which defines commitment on ethical behaviour. As per Clause 5 and 6 of Tata Code of Conduct, the organization is committed towards anti corruption and prevention of bribery.</p> <p>Tata Code of Conduct has been revised during the year to include some new requirements like sustainability and climate change etc.</p>	<p>1) Tata Chemicals has an elaborate system and processes on the 'management of business ethics' and all employees sign the Tata Code of Conduct. The company has a Chief Ethics Counselor located at Corporate office. Each SBU has an Ethics Counselor.</p> <p>Tata Code of conduct provides an opportunity to all employees / stakeholder to communicate any unethical act of any employee to concern ethics counselor.</p> <p>The Tata Code of Conduct is sent to all suppliers with the contract, for their perusal in respect of relevant clauses.</p> <p>Awareness programmes are conducted on Tata Code of Conduct for all employees across the locations and corporate and marketing offices.</p>	<p>Statistics of the concerns for the year 2008-09 against Tata Code of Conduct is as follows:</p> <p>Total concerns raised in 08-09 : 26</p> <p>Code wise classification:</p> <ol style="list-style-type: none"> 1. Clause 4 (Equal opportunity) - 02 2. Clause 13 (Third party representation) - 02 3. Clause 17 (Ethical Conduct) – 21 4. Seeking information on Code - 01 <p>All concerns were considered for appropriate process as per procedures for closure with actions on each as per the decision of ethics committee.</p>