

Egyptian Transport & Commercial Services Co. S.A.E.
Integrated Global Transport Services & Solutions

Towards Corporate Social Responsibility EGYTRANS 4th UN Global Compact Communication on Progress Report July 2013



EGYTRANS

We Make Integrated Transport Easy, Safe and
Cost-effective

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CHAIRMAN'S COMMITMENT

EGYTRANS is committed to maintaining high ethical, social, environmental and governance standards and to creating sustainable value for the benefit of all our stakeholders. We have been supporting the United Nations Global Compact since August 2009, This is our 4th official report.



Since then, we have been gradually implementing the ten universal principles within the area of Human Rights, Labor, Environment and Anti-Corruption as an integrated part of our strategy, culture and daily operation. This report covers the period from July 2012 until July 2013. For this report, we have enlarged our scope to prepare it according to the GRI guidelines, in its updated version (G3) as well as according to ISO 26000 Social Responsibility core subjects.

Our membership and support of the UN Global Compact is a part of our CSR program and the Communication on Progress (COP) ensures the transparency of what we do, how we operate and how we invest. The COP drives us to perform with the highest standards of good governance and ethics through all services.

We continue to support this global network and to strive for better and more comprehensive implementation of the UN Global Compact principles.


Hussam Leheta
Chairman & CEO
EGYTRANS

EGYTRANS BACKGROUND

The Egyptian Transport and Commercial Services Company S.A.E. was established in December 1973 under Egypt open door policy with regard to private enterprises. However, its transport activities and experience date back to 1939 as a continuation to GAMAL EL DIN LEHETA & CO. EGYTRANS was nationalized in 1964 when it was one of the biggest companies in EGYPT offering shipping agency, tourism agency and other transport services.

The company was originally established as a limited liability company with a capital of EGP 10,000. It is now a corporation with Issued Capital of EGP 156,062,500 million and annual turnover of EGP 130 million. Since its inception it has grown into a true leader in the transport field in Egypt with three hundred and fifty employees and eight branches in strategic locations close to the country's main ports, airports and transport centers.

Services

The mission of EGYTRANS is to make integrated transport easy, safe and cost-effective. In order to do this, the company offers a wide and varied mix of services in the field of integrated transport, with the ability to handle all the stages of any shipment door-to-door from pick-up and transport to delivery at the final destination.

Sea Freight

EGYTRANS is able to ship all types of cargo including general, break bulk, containerized or Ro/Ro cargo to and from any part of the world at competitive rates in addition to issuing its own Suez Gulf Line NVOCC bills of lading. For very large volumes, EGYTRANS provides a chartering service for cargo vessels.

Air Freight

EGYTRANS provides a quick and easy air freight service at competitive rates. Our services include import, export, consolidation and hanging garment containers.

Consolidation (LCL)

EGYTRANS offers weekly consolidation services from Egypt to over 400 worldwide destinations with receiving stations in Cairo and Alexandria. Consolidation groups many small sea or air freight shipments together into a single large shipment and offers the advantages of competitive freight rates and insurance premiums, reduced risk of damage and reduced packing costs. We continually expand and develop our services by adding direct import services from new origins and direct export services to new destinations in order to provide our customers with the safest, fastest, most regular and most economic service available in the local market.

Warehousing

EGYTRANS owns and operates several warehouses strategically located at or near industrial areas in Cairo, Alexandria and the Port Said Free Zone. EGYTRANS provides distribution services, bonded warehousing, container yard operations and domestic storage. Many years of experience and continuous process improvement have made EGYTRANS's warehousing service one of the central building blocks of the company's success.

Exhibitions

EGYTRANS provides integrated solutions in the field of fairs and exhibitions, smoothly coordinating the transport of cargo and materials to and from any exhibition. EGYTRANS has a specialized Exhibitions Department comprising a team of professionals in transport, logistics and freight handling and providing efficient and reliable services to both organizers and exhibitors at competitive rates.

Project Logistics & Specialized Transport

EGYTRANS specializes in logistical solutions for large projects including transport of sensitive equipment and packages of exceptional weight or dimensions. EGYTRANS has a highly trained and specialized team that carries out detailed route surveys and logistical studies to determine the best transport method and route for each piece of project cargo. The team then supervises any work required to reclaim or strengthen any part of the route or remove obstacles along the path before carrying out the actual transport.



Over the years, EGYTRANS has successfully provided integrated transport solutions for power plants, cement mills, steel mills, transformer sub-stations, water and wastewater plants, oil, gas and petrochemical plants, large scale infrastructure projects and others.



Other Services

EGYTRANS also performs customs clearance, packing, land transport, distribution, transit and insurance services, providing its customers with a one-stop shop for all their cargo transport needs.

World-wide Network of agents

While based in Egypt, EGYTRANS has established a worldwide network of professional agents, enabling us to serve our customers and handle shipments to or from any location in the world. Our agents are carefully selected based on their track record, expertise and commitment to maintaining the excellent level of service that our customers expect. Through this worldwide network, EGYTRANS is able to offer global capabilities while maintaining the flexibility and personalized service of a local company.

EGYTRANS has agents all around the world in the following geographical areas:

- Far East
- U.S.A. & Canada
- Indian Sub-continent
- Europe & Mediterranean Basin
- Australia
- Africa
- Middle East
- South America

Participation in Industry Organizations

EGYTRANS is an active member of FIATA, the International Federation of Freight Forwarder's Associations and BIMCO, the Baltic and International Maritime Council and EIFFA, the Egyptian International Freight Forwarders Association and an official agent of IATA, the International Air Transport Association. EGYTRANS is also a member of the Through Transport Club, the leading provider of insurance and risk management services to the international transport and logistics industry.



Customer Commitment

At EGYTRANS, we believe that our customers' success is our success and we are deeply committed to building lasting win-win relationships with our customers. We make every effort to gain a deep knowledge of our customers and focus on tailoring solutions to their individual needs. Whether we are moving cargo to the other side of town or to the other end of the world, we actively listen and respond to our customers' requirements and proactively seek new ways to help our customers achieve success by ensuring that their cargo arrives safely, in perfect condition, within budget and on time, every time.

1- HUMAN RIGHTS



1. HUMAN RIGHTS

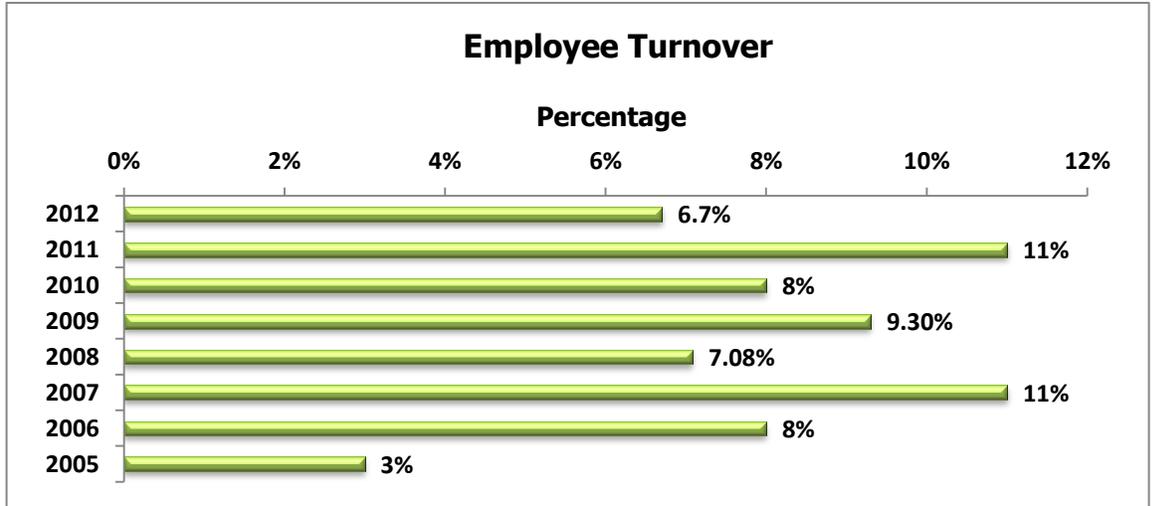
UN Global Compact Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (Human Rights) Issue 5: Discrimination and Vulnerable Groups, Issue 6: Civil & Political Rights, Issue 7: Economic, Social & Cultural Rights, Issue 8: Fundamental Principles and Rights at Work

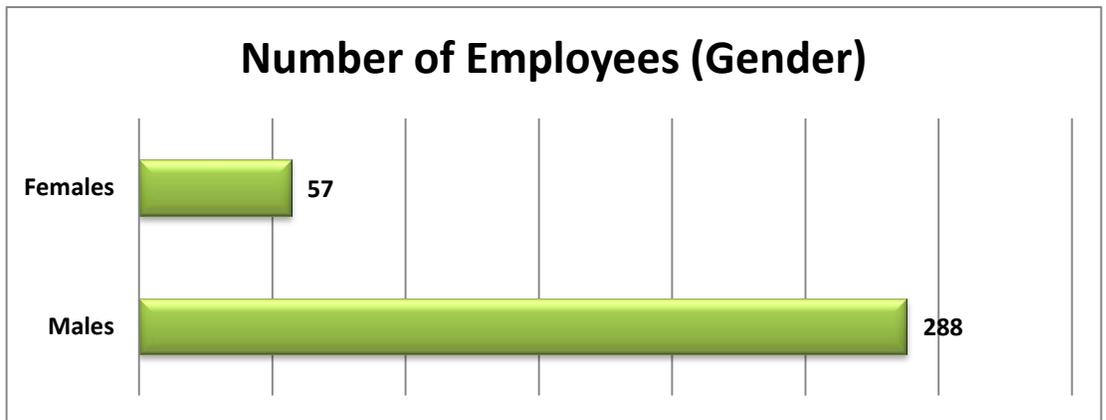
System	<ul style="list-style-type: none"> - "We promote employment conditions that protect the rights and welfare of all EGYTRANS employees". - EGYTRANS Code of Ethics. For more information, please visit our IR website: http://ir.EGYTRANS.com/code.htm - As an SME active in applying Corporate Governance and CSR practices, we expressly support human rights through all our engagements with our employees and our partners. - We do not have an advanced company policy or strategy in this regard but the senior management commitment is very clear.
Actions	<ul style="list-style-type: none"> - EGYTRANS protects the rights of employees by fully explaining their rights and responsibilities according to the Egyptian Labor Law to them upon employment. - In EGYTRANS, we take our employees and their interests very seriously by providing them with safe and healthy working conditions, fair salaries and access to private health care through providing all EGYTRANS employees with medical insurance. - All human rights issues are fully considered and respected at EGYTRANS. Employees are well treated, fairly appraised on an annual basis, and compensated financially and non-financially based on their achievements and work. - All safety measures are applied at work places and offices and all employees have health insurance. - The hiring procedure secures equal rights during the entire process. After assessing the applications, various candidates are interviewed by the HR dept. and the direct manager. The final candidate, for certain levels only, is also interviewed or approved by the CEO. The Nomination & Compensation Board Committee approves changes in top management. During the probation period of three months any contract can be cancelled immediately from both sides. After this period, the minimum notice period is two months if the employee has spent less than ten years in the company or three months if he/she has spent more than ten years in the company, as the labor law in Egypt prescribes. - The total number of hours per week for each employee is 45.50 hours, i.e. 8 hours/day for 5 days and 5.50 hours on Saturday. Any extra hour or any work during a scheduled vacation/holiday is compensated according to the company policy. - With respect to women with children, they are allowed to take an hour off work at any time of the work day during the first two years of the child's life. New mothers are granted three months paid maternity leave with the option of applying for up to three years of unpaid leave per child for first three kids.

- Employees may be granted unpaid leave for limited periods based on a case by case study.
- EGYTRANS provides life insurance for all its employees. A lump sum of 48 months gross salary is paid to the family of any employee in case of death or disability.
- We conduct regular employee satisfaction surveys to ensure the satisfaction of our team and prevention of discriminatory actions throughout the organization.

- The turnover rate reached 6.7% during 2012/2013.



- We provide a friendly workplace with no discriminatory practices. There is complete gender equality in the workplace.



- The value of EGYTRANS' annual employee life insurance contract with CIL reached EGP 110.17 in 2012/2013.
- The value of EGYTRANS' annual employee medical insurance contract with Inaya Egypt reached EGP 514.83 in 2012/2013.

Performance Indicators

UN Global Compact Principle 2: Businesses should ensure that they are not complicit in human rights abuses.

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (Human Rights) Issue 2: Human Rights Risk Situations

System	<ul style="list-style-type: none">- As an SME active in applying Corporate Governance & Corporate Social Responsibility practices, we expressly support human rights through all our engagements with employees and stakeholders.- EGYTRANS is committed not to engage in any business activities that lead directly or indirectly to human rights abuses.- Our commitment to zero tolerance for human rights violations is expressly provided, adhered to and lived by.
Actions	<ul style="list-style-type: none">- EGYTRANS abides by the laws, regulations and guidelines in the field of eliminating human rights violations and we encourage our employees and stakeholders to implement zero tolerance on such actions.- Internally, there have been no abuses in human rights or incidences of complicity. No form of force is ever used.
Performance Indicators	<ul style="list-style-type: none">- We have not received any claims of human right abuses related to our business or operations.

2- LABOR STANDARDS



2. LABOR STANDARDS

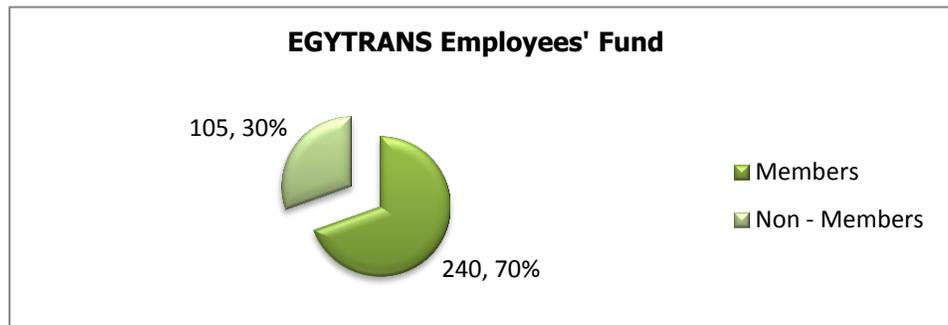
UN Global Compact Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (Human Rights) Issue 4: Resolving Grievances, Core Subject (Labor Practices) Issue 3: Social Dialogue Core Subject (Labor Practices) Issue 1: Employment and Employment Relationships

System	<ul style="list-style-type: none"> - We uphold the freedom of association and the effective recognition of the right to collective bargaining.
Actions	<ul style="list-style-type: none"> - We are as supportive towards the freedom of association and the right to collective bargaining as the law permits. - The EGYTRANS Employees' Fund was established in April 3rd 1999. The Fund includes 240 members. The members of the Fund freely elect its Board of Directors in order to manage and operate the fund and control its services. The Fund operates as per its General Assembly's instructions. The Fund's board of directors represents the Fund in all official events. The last board election was conducted in 2011. - The Board of Directors of the Fund organized the following committees to manage its activities: <ul style="list-style-type: none"> • Consultancy Committee • Budget and Follow-up Committee • Social Responsibility Committee • Culture and Trips Committee • Sports Committee • Communications and Media Committee - The Fund provides several services to its members including: <ul style="list-style-type: none"> • Marriage remuneration; provided once to each member. • A contribution in case of death or sickness of a member or his/her first-degree relative. • Loans given to employees for purposes not covered by the company's loans system particularly school fees and expenses. • Organizing Summer Camps. • Organizing exhibitions and providing collective discounts for some durable and consumer goods. • Organizing Workshops and Lectures. • Organizing Iftar for employees during the holy month of Ramadan. • Organizing trips throughout the year. • End of service remuneration. • Any other services required by employees' family, e.g. <ul style="list-style-type: none"> ○ Rewarding high ranked school students of final stage certificate ranked 90% & up. ○ Rewarding the University final certificates students who ranked Excellent.

- EGYTRANS provides all facilities required to make the Funds' work successful. Following are some of the facilities and support provided by EGYTRANS:
 - Hosting all Funds' board meetings in the meeting rooms.
 - Hosting the general Assembly.
 - Providing headquarters for the Fund in EGYTRANS offices in Alexandria, as required by the Governmental Social Affairs Department.
- The EGYTRANS Board of Directors agreed to contribute EGP 100,000 as a grant in 2013 to support the Fund in achieving future sustainability through self-financing based on profitable projects.
- Employees are able to send individual or collective feedback or suggestions to their direct managers or to top management directly through various communication channels including e-mail or requesting a meeting. Management is committed to reviewing this feedback and responding promptly, implementing suggestions for improvement where applicable. (EGYTRANS Formal Communication Manual).
- An electronic mail account suggestions@EGYTRANS.com was created through which a specialized committee receives constructive suggestions from employees on how to improve productivity and efficiency and employee satisfaction and performance. The Committee submits its recommendations to the CEO for approval.
- Another electronic mail account employeefeedback@EGYTRANS.com was created through which the HR dept. receives requests and complaints from all EGYTRANS employees, reviews them and responds within 15 days.

Performance Indicators



- % of departments and branches that hold annual meetings to discuss employee concerns = 100%.
- No. of suggestions submitted from employees in 2012/2013 = 9.
- No. of accepted suggestions in 2012/2013= 3.
- % of accepted suggestions in 2012/2013= 33.3%.
- No. of feedback/complaints from employees to HR dept. in 2012= 4.
- No. of responses from HR dept. to received feedback/complaints in 2012= 4.
- % of responses from HR to feedback/complaints received in 2012= 100%.

UN Global Compact Principle 4: Businesses should support the elimination of all forms of forced and compulsory labor.

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (Human Rights) Issue 8: Fundamental Principles and Rights at Work

System	<ul style="list-style-type: none"> - All employees are above the age of 18 and educated. Therefore, the issue of forced labor is not directly addressed within our management systems and processes.
Actions	<ul style="list-style-type: none"> - We ensure that all our employees are aware of their rights and entitlements, their conditions of service and their freedom to leave (with consequences of such departure as per the law). - EGYTRANS does not hire anyone by force or keep any employee by force. All employment takes place subject to an employment contract and all employees are free to leave the company at any time subject to fulfilling the notice period in the contract. - All employees earn above the minimum wage. - All our employees are of a mature enough age to identify their needs and concerns and communicate them to the company.
Performance Indicators	<ul style="list-style-type: none"> - % of employees who have signed legal employment contracts with the company = 100%.

UN Global Compact Principle 5: Businesses should support the effective abolition of child labor

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (Human Rights) Issue 5: Discrimination and Vulnerable Groups, Issue 6: Civil & Political Rights, Issue 7: Economic, Social & Cultural Rights, Issue 8: Fundamental Principles and Rights at Work

System	<ul style="list-style-type: none"> - All employees are well above the age of 18 and educated. - All employees receive adequate pay obviating the need for them to force their children to work. - The minimum age of part time employees is 18 years. These are usually summer trainees at university who can perform small jobs in order to learn and earn some money.
Actions	<ul style="list-style-type: none"> - We ensure that we do not hire children in all our branches and departments.
Performance Indicators	<ul style="list-style-type: none"> - % of EGYTRANS employees above 18 years = 100

UN Global Compact Principle 6: Businesses should support the elimination of discrimination in respect of employment and occupation.

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (Human Rights) Issue 3: Avoidance of Complicity, Issue 5: Discrimination and Vulnerable Groups, Core Subject (Labor Practices) Issue 5: Human Development and Training in the Workplace

<p style="text-align: center;">System</p>	<ul style="list-style-type: none"> - "We treat all people fairly and respectfully regardless of religion, ethnic origin, race, gender, age or disability" - EGYTRANS Code of Ethics. For more information, please visit our IR website: http://ir.EGYTRANS.com/code.htm - We are committed to eliminating all forms of discrimination in respect to employment and occupation. - The company does not discriminate between its employees based on race, religion, gender or age. - We support equality in the workplace with equal female to male employment opportunities and compensation. - There is a system for hiring people, evaluating them, training them and rewarding them on their achievements. The system applies equally to everyone without discrimination. Promotions and rewards are announced.
<p style="text-align: center;">Actions</p>	<ul style="list-style-type: none"> - The hiring and firing policy of EGYTRANS is based on Egyptian labor laws. - Equal opportunities are given to everyone when hiring for a new position or a vacant one. The only thing that counts is the qualifications and competencies required by the job itself. - An attempt is always made to recruit internally before looking outside the company when there is a job opening. - Equal opportunities are also given for training. - We do not discriminate against any form of handicap and have demonstrated this by employing physically challenged staff in the organization. - We believe in local recruitment and accordingly, we recruit directly from the areas we work in. - EGYTRANS respects all religious practices and employees are allowed time for prayer (Christians are allowed one hour delay every Sunday morning and Muslims may pray during the day according to the scheduled prayer times). All Muslim and major Christian holidays are paid holidays for all employees in accordance with Egyptian law. There are five Christian occasions when Christians only are given paid holidays.

Performance Indicators

- Total number of incidents of discrimination and corrective actions taken= 0.
- Number of Muslim employees inside EGYTRANS = 339.
- Number of Christian employees inside EGYTRANS = 6.
- % of Christian employees in EGYTRANS = 1.7%.
- Number of female employees in EGYTRANS = 57.
- % of female employees in the company (including the managerial and board level) = 16.5 %.
- Number of male employees in EGYTRANS = 288.
- % of male employees in the company = 83.5 %.
- Number of handicapped employees in EGYTRANS = 12.
- % of handicapped employees in the company = 3.4%.

3- ENVIRONMENT



3. ENVIRONMENT

UN Global Compact Principle 7: Businesses should support a precautionary approach to environmental challenges

UN Global Compact Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility

UN Global Compact Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (The Environment) Issue 1: Prevention of Pollution

System	<ul style="list-style-type: none"> - "We have a duty to the society in which we live and work. We are also committed to protecting the environment and natural resources" - EGYTRANS values. For more information, please visit our IR website: http://ir.EGYTRANS.com/vision.htm - EGYTRANS is committed to applying occupational health and safety procedures in order to secure its work environment and was granted the OHSAS 18001 certificate. The company also acts to prevent practices leading to environmental pollution and has attained ISO 14001 certification. - EGYTRANS applies an e-business, data center & ERP system.
Actions	<ul style="list-style-type: none"> - EGYTRANS is a non-smoking organization; it prevents smoking in all of its locations for all employees, trainees and visitors. - EGYTRANS is committed to gradually reducing the use of paper. - EGYTRANS applied the following actions to reduce <u>energy consumption</u>: <ul style="list-style-type: none"> o Installation of fluorescent lamps. o Using flat computer screens. - EGYTRANS applied the following actions to reduced water usage and paper consumption to <u>save costs and preserve the environment</u> : <ul style="list-style-type: none"> o Preventing printing of unneeded emails. o Using electronic instead of paper filing. - The company and all of its branches take active steps to secure the work environment against physical risks resulting from: <ul style="list-style-type: none"> o Severe heat and cold. o Noise and vibrations. o Intense light. o Dangerous and harmful radiation. o Atmospheric pressure changes. o Static and dynamic electricity. - The company is committed to providing effective means of risk prevention and mitigation, including means of providing first aid, rescue and cleanliness in workplaces. - The company and its branches are committed to following the required procedures, precautionary measures and stipulations required to prevent fire risks, which are:

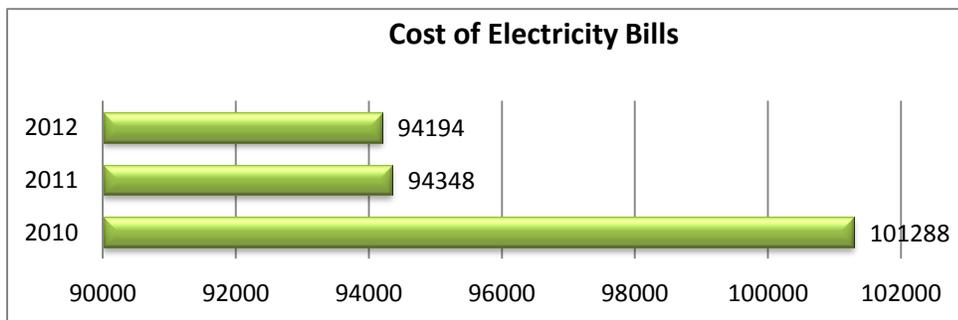
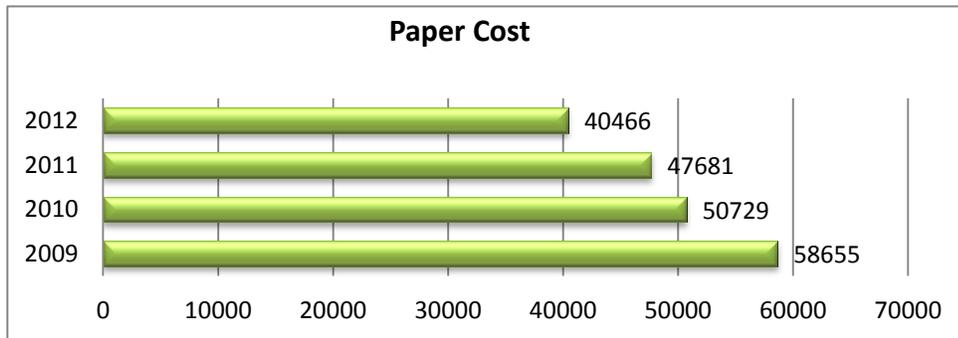
III- International TUV certificate indicates that EGYTRANS is the first company in its field of work worldwide to obtain integrated ISO 9001, 14001, and 18001 and the first worldwide to obtain ISO 10002.

For more information please visit our IR Website: <http://ir.EGYTRANS.com/integrated.htm>



Total Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with environmental laws and regulations = 0.

- Total Cost of purchased paper in 2012/2013= EGP 40466.
- Total Cost of electricity bills in 2012/2013 = EGP 94194.



4- ANTI- CORRUPTION



4. ANTI- CORRUPTION

UN Global Compact Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

ISO 26000, 2010 Guidance on Social Responsibility Core Subject (Fair Operating Practices) Issue 1: Anti – Corruption

System	<ul style="list-style-type: none"> - As an active company in the field of applying Corporate Governance, EGYTRANS operates in a transparent and accountable manner. - “We will always live up to our promises. We treat everyone with respect, dignity and honesty. We hold ourselves to the highest moral and ethical standards in what we do.” – EGYTRANS values. For more information, please visit our IR website: http://ir.EGYTRANS.com/vision.htm - “We practice fair and honorable competition” - EGYTRANS Code of Ethics. For more information, please visit our IR website: http://ir.EGYTRANS.com/code.htm - “We reject the offering or acceptance of bribes, gifts, personal commissions or other inducements leading to unfair or preferential treatment” - EGYTRANS Code of Ethics. For more information, please visit our IR website: http://ir.EGYTRANS.com/code.htm - EGYTRANS complies with all related laws and regulations.
Actions	<ul style="list-style-type: none"> - Internally, EGYTRANS has set up an auditing system where all departments and expenditures are audited on an ad-hoc basis to ensure that all budgets are spent properly according to the company’s policies. - EGYTRANS has an Audit & Corporate Governance Board Committee which consists of 2 non-executive board members and an independent chairperson. The committee’s role is to supervise the external auditor, review, revise & comment on company financial statements, approve related party transactions, examine the impact of various risks on the Company’s activities and review Corporate Governance practices in EGYTRANS. - The Audit & Corporate Governance Board Committee held 5 meetings between July 2012 and July 2013. - The Committee issued quarterly disclosure reports that included the key recommendations on observance of disclosure to the Egyptian Stock Market according to the set dates for this purpose. - The Committee asked the External Auditor to submit a Management Letter with a report of observations and recommendations for discussion. The mentioned report was presented to EGYTRANS Board of Directors. - The Committee examines the impact of various risks on the Company’s activities. The Company appointed a Risk Management Coordinator based on the Committee’s recommendations.

- Because the late Internal Auditing Manager passed away in February 2012, CG and Audit Committee had a positive role in recruiting a new Internal Auditing Manager by setting objective criteria for interviewing and selection and participating in the selection process.
- The Audit & Corporate Governance Committee discussed and approved the new Internal Auditing Manager annual plan after giving him sufficient time to review and assess the current status and required work.
- The Committee prepared a report that enumerated the key recommendations the Committee issued during its meetings in 2012/2013 in addition to an examination of the decisions issued by the Board and the procedures taken to implement these decisions.
- The following actions were taken to implement anti-corruption policies and practices:
 - Employee training and awareness.
 - Anti-corruption sections in EGYTRANS Code of Ethics & Values are publicly accessible.
 - Immediate termination of supplier/contractors contracts if corruption occurs.
 - Penalty system for employee breaches.
 - Specialized units inside the company to deal with corruption incidents (Audit & CG Committee, Internal Audit Dept. & Legal dept.).
 - EGYTRANS participates in non GC initiatives in the field of fighting corruption.
 - Collective action: EGYTRANS joined forces with industry peers and with other stakeholders in fighting corruption.
- Externally, EGYTRANS does not allow any form of bribery. We believe that transparency is the only way forward for a better economy.
- Creating an advanced whistle-blowing system accessible by all our employees.
- Dealing with incidents as they occur to minimize miscommunication and inappropriate behavior.
- Participation in collective action and stakeholder engagement through focus groups discussing the problem of corruption and identifying means to fight such corruption.
- Additionally, EGYTRANS has put the 10th principle on its website for advocacy. For more information, please visit our IR website: http://ir.EGYTRANS.com/corporate_social_responsibility.htm

Performance Indicators

- Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations = 0.

UN GLOBAL COMPACT NETWORK MEETINGS

EGYTRANS participated in the following UN Global Compact Network meetings in 2012/2013:

1. The Egypt Global Compact Network organized a Sustainability Reporting Workshop on the 27th of September, 2012. The workshop was held at the new ECRC premises and 14 representatives of the network's members attended the workshop. The one day workshop introduced the link between the ISO 26000 and the UN Global Compact as well as how to use the GRI guidelines to prepare sustainability report that the company can use to report on both initiatives.



CONTACTS

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**Source: Global Reporting Initiative
Sustainability Reporting Guidelines, Version 3.1.**
www.globalreporting.org

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SO4 Actions taken in response to incidents of corruption.	20,21
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SO8 Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations.	21