



TATA SPONGE IRON LIMITED

COMMUNICATION ON PROGRESS 2007-2008





Message from the Managing Director

Suresh Thawani Managing Director

Tata Sponge Iron Limited (TSIL) is committed to take all necessary actions to adhere to the principles of Global Compact. We are pleased to present the first Progress Report which pertains to period ending with December 2008.

TSIL is a part of Tata Group in India which identifies itself with social responsibility as an integral part of business. In doing so, the group and the company addresses human, social, economic, environmental and developmental goals of the nation. TSIL operates from rural area in the State of Orissa, India. The organization since its inception in 1986 has worked towards uplifting the quality of life of communities surrounding it by providing direct and indirect employment, developing entrepreneurs and addressing social needs like education, water, health, sanitation among others. The company also has indirect contribution in development of infrastructure in the area. All strategic decisions of the organization are consistent with social and environment consideration. This report attempts to showcase the initiatives taken by the company as stated above.

The Tata Code of Conduct, the guiding principle for all the group companies including TSIL addresses all ten principles of UN Global Compact. TSIL adheres to the Tata Code of Conduct in letter and spirit and ensures the global principles of Human Rights and Environment Protection are abided by. TSIL is an equal opportunity organization both in terms of employment and career progression. TSIL strives to engage itself in broader societal challenges consistent with the ten guiding principles of the Global Compact.

Suresh Thawani Managing Director

TATA SPONGE IRON LIMITED

PO Joda Dist Keonjhar Orissa 758 034 India Tel (06767) 278178 Fax 278129 www.tatasponge.com email info@tatasponge.com





Ladies and Gentlemen,

Tata Sponge Iron Limited (TSIL) is delighted to submit its first communication and progress to the Global Compact Society for the period ending December, 2008. TSIL is the largest coal based sponge iron producer in India. The company is a bench-mark for environment protection, Corporate Social Responsibility, among others in the industry it belongs to. Being situated in rural area in the State of Orissa, India, the company has committed itself to serve the communities surrounding it. TSIL is certified to ISO-9001 and ISO-14001. Among the coal based sponge manufacturers, the



company is a pioneer in production of power through waste heat recovery boilers (WHRB) by using hot discharged gases from sponge iron kilns. Its power plant is registered with UNFCC and has been earning CERs for co-generated power. The company is engaged since its inception in 1986 in addressing social needs of the surrounding communities by providing direct & indirect employment, developing entrepreneurs besides taking social welfare initiatives as responsible corporate citizen.

The report covers the actions taken by TSIL towards Corporate Social Responsibility and the impact on the communities surrounding its location.

I hope that the report would be found useful.

Yours truly,

LOURSOL

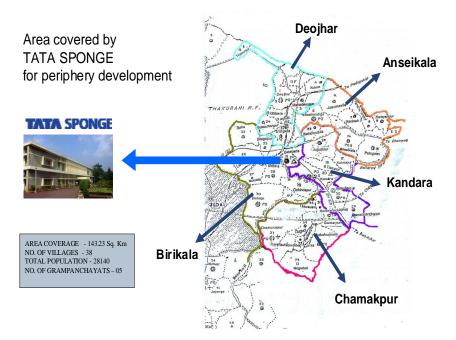
(Suresh Thawani)





Consistent with the TATA Group purpose, we at Tata Sponge endeavor to return to society from what it earns, to improve the quality of life in India and its immediate surroundings, thus social responsibility forms an integral part of TSIL's vision & mission. The company has a well structured process for carrying out community development initiatives through its Corporate Sustainability department, reaching out to the requirement of 5 surrounding Grampanchayts, in the area of EDUCATION, HEALTH & SANITATION, DRINKING WATER, AGRICULTURE, SPORTS & CULTURE and OTHER AMENITIES i.e. village electrification, creating entrepreneurs, skill up-gradation for employability, supporting Self Help Groups, and environmental protection projects i.e. massive tree plantation, water harvesting, re-usage of waste products etc.

The company over the years has relentlessly pursued to provide basic infrastructural supports in the above focus areas, covering an area as shown in Fig-01:



(Figure -01)

State : Orissa, Dist: Keonjhar	TSIL's Coverage under Corporate	% of Coverage
Block : Joda	Sustainability Programs	
Geographical Area of Joda: 427.27 Sq. KM	Area Covered : 143.23 Sq. KM	Area : 33.52%
Total No. of Villages: 118	Total no. of Villages : 38	Villages: 32.20%
Total No. of Grampanchayats : 15	Total no. of Grampanchayats : 05	G.P. : 33%

An overview of various development initiatives undertaken over the years and in particular during the period 2007-08 are as follows:





EDUCATION:



Company has constructed: -

Ø School buildings, Science



Laboratory, Library room, Kitchen cum dinning unit, Toilets & Boundary walls.

- Ø Provided duel bench desks, almirah & book shelves to primary & high schools.
- Ø To promote computer education for the rural students, the company has provided two computers systems to 2 high schools (as shown Fig-02).
- Ø Provides financial support to a coaching centre for SC/ST students.



	UPTO 2007	2007-2008
New School Building	8	2
Renovation of existing Bldg.	5	1
Science Laboratory	2	1
Library & Computer room	1	1
Kitchen cum dinning unit		1
Duel Bench Desk	465	50
Almirah & Book shelves	36	2
Computers		2
Toilets in School campus		2
Boundary wall	10	3

(Fig- 02)

Ø Under the Affirmative Action scholarship scheme one student of SC/ST community is sponsored through the Foundation of Academic Excellence & Access (FAEA), Delhi with a contribution Rs. 72,000/- per annum.







Health & Sanitation:

In view of inadequate health service available for the rural populace around the vicinity, the

more vulnerable and marginalized communities were found deprived of minimum medical facility. Tata Sponge has initiated free medical service years ago by conducting Weekly health check-up camps in the villages, where a large number of villagers, specially the women & children, seeking medical attention receive immediate treatment. Those requiring specialized Medicare are



referred to specialists for further treatment. During the year 2007-08 the total no. of patients to have received medical care during 2007-08 are shown in fig- 03. The district of Keonjhar is malaria infested area where the menace of Mosquito bites takes a serious turn

during monsoon. In order to provide relief from this dreaded mosquito bite, which often takes a heavy toll on children & women, the company distributes medicated mosquito nets free of cost to the villagers every year. As of date 16,820 such mosquito nets have been distributed, resulting in drastic reduction of malaria death in the

2007 - 2008	No.	of
Village	Patients	Camps
BIRIKALA	424	43
BHAGALPUR	449	43
DADUAN	129	42
GOVINDPUR	650	43
LAHANDA	485	42
TOTAL	2137	213

Fig.-03



surrounding villages. Under the health care program diabetes detection camp, eye checkup and blood donation camp have been organized in our dispensary for villagers. The dispensary which is also declared as a TB Detection centre under RNTCP, Sponsored by State Government caters to the general public at large.





AIDS/HIV Prevention Program:



In its resolve to fight against HIV, Tata Sponge observed World AIDS Week beginning 24th May 2007 in joint collaboration with an NGO M/s Ideal Development Agency, Keonjhar. During this week long solidarity campaign, a wide spectrum of people were covered i.e. employees, contract labourers truckers & those high risk group vulnerable to AIDS working in and around the plant. Public awareness rallies, mass meetings, counseling camps, distribution of handouts were carried out in local villages.

Drinking Water:

Continuing in its crusade to make safe drinking water available to the maximum number of villagers whose only dependence was rivers and small nalas. During summer acute scarcity of drinking water was a major concern. The company over the years has provided bore wells with over head tanks & pipe line connectivity -12 nos, Tube wells – 58 nos., Ring well – 31 nos. in different villages, school campuses & public health centre. Around 25,000







villagers have benefited from these projects who no longer have to travel long distances for collecting water for their own use, as well as their live stocks.

Sports & Culture:

 In order to retain their original cultural heritage various cultural functions and competition are sponsored in the rural and tribal communities.



 For the inclusive growth & development, musical instruments, sports equipments, recreational items are provided in the schools & community centers. Besides these, annual football tournament, athletic meets, ho-dance competition are also organized.











Employability & building Entrepreneurs:

Skill development and resource building forms an important part of company's strategy for rural income generation. Enterprise Development has been encouraged to create sustainability within the villages.



ମୋମାମଙ୍କର ଭବିଷ୍ୟହୁ ଠିକ୍ କାଟରେ ପରିଚାଳିତ କରିବା- ପପଦେଷ୍ଟାଙ୍କ ତୁତୀୟ କମର ଛାଡ଼

ଚାଳକର ମିକ୍ରେ କରେ ଭାମସ ନହିଳ ନାଳନା ସିଛା କରୁରହି

As an important strategy the various initiatives taken in partnership with Vidya Shakti Niyas (VSN)- a company supported charitable organization in rural enterprise, for the development and establishment of Self Help Group(SHG). Implementation of skill up-gradation programs to create opportunity for sustainable livelihood is shown in fig.-04







Initiatives	Supporting Agency	Beneficiaries
6 months short skill up gradation training	VSN	4 ST students
at Industrial Technical Institute.		
Driving Training	VSN	307 Local Youths
Sponsorship for attending 2 years Boiler	TSIL	10 SC/ST candidates
attendance Diploma course at SDEAS-		
Central boiler maintenance & resource		
institute Rourkela.		
In house Technical on the job training for	In the company's	12 SC/ST candidates
fitter, welder, mechanic, wiremen.	factory	with stipend.
Skill development - tailoring, stitching,	VSN	125 farmers & ladies
embroidery, coal briquette making,		
mushroom cultivation, bee keeping,		
poultry farming etc.		
Created entrepreneurs by awarding job	TSIL	02 from ST/SC
contracts for miscellaneous/unskilled		communities.
jobs.		
Extending technical/financial support to	VSN	10 Groups (8 ladies &
Self Help Groups(SHGs)		2 gents groups-each
		group 12 members)
Created a five member ST/SC SHG group	TSIL	1 Group.
& provided a Power Tiller		

Fig.-04









CSR POLICY

Tata Sponge recognizes the fact that the long-term future of the company is best served by addressing the interests of all its stakeholders in a balanced manner.

As a responsible corporate citizen, Tata Sponge will consistently strive for opportunities to meet the expectations of its stakeholders by pursuing the concept of sustainable development with particular emphasis on environment care & periphery development and in the course, promote national interest.



(Suresh Thawani) Managing Director 1st April 2007

AFFIRMATIVE ACTION POLICY

Tata Sponge I ron Limited believes in social equity.

The company adheres to the principle of equal opportunity, irrespective of caste, whether in recruitment or career advancement within the organization.

The company is also committed to directly conducting or supporting initiatives to ensure an equal footing for socially and economically disadvantaged sections in the country at large, and specifically the scheduled caste and scheduled tribe communities.

23rd July 2007



(Suresh Thawani) Managing Director





HUMAN RIGHTS

Principles (GRI Indicators correlated with)	Company's Policy	Key Results & Measurement
Principle-1: Business should support and respect the protection of internationally proclaimed human rights (HR 1,2,3,4)	We review our HR policies periodically to ensure that human rights are not violated.	 We ensure that contractors do not employ child labourers in our premises. Factories Act & Rules, Contractor Labour (R&A) Act & Rules are strictly adhered in terms of working hours and welfare amenities meant for Associates & Contractor labourers. Copies of TATA Code of Conduct has been given to each of the employee and to create awareness, classes are being taken on regular basis to reinforce its clauses. As a review mechanism, human rights issues are deliberated in co-ordination meeting and HR Committee.
Principle-2: Make sure they are not complicit in human rights abuses (HR 2,3)	We emphasize on bipartite / collaborative / consultative decision making to address HR issues proactively to avoid conflict with the union and Associates.	 Ü Company ensure that our business relations with different agencies who practice relevant standards and ethical practices including compliance to all statutory regulations. Ü Various bipartite forras representing Management & Associates meets periodically and resolves various issues and conflicts. Ü Statutory Committees like Safety, Canteen and Health resolves various grievances pertaining to statutory in nature.





LABOUR STANDARDS

Principle-3 : Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	All statutory labour laws are implemented and we have a process to review the statutory compliance by a core committee constituted by the Management	ü	Focus is given to settle common issues of Associates through collective bargaining forum being represented by equal representative by Management & Associates. Several bipartite agreements are arrived at through this kind of forum
Principle-4: The elimination of all forms of forced and compulsory labour (HR 5, 7LA 3, 4)	No forced & compulsory / under aged labour are deployed. This is being ensured through various check post like Security/Safety/HR	ü	Engagement of contract labourer / indirect employment are in line with contract labour regulation & abolition Act. There is no violation nor any forced / compulsory entry of labour force inside the factory premises.
Principle-5: The effective abolition of child labour (HR 6)	All contractors / suppliers are informed not to deploy child labour / under aged personnel Our standing order also restrict engagement of child labour / under aged labour		Our hiring policy reflects transparency and focus on equal opportunity employer. Company ensures engagement of labour over 18 years of age including in its township.
Principle-6:Eliminate discriminationin respect ofemployment andoccupation.(HR 4, LA 10,11)	We honestly follow TATA Code of Conduct, also practice role of equal of opportunity employer.	ü	Company's hiring process evidences that no discrimination prevails on account of age, sex, locality, caste, creed, religion. Company doesn't discourage for employment of physically challenged people.





Environment <u>Principle – 7</u>

Business should support a precautionary approach to environmental challenges.

Environmental policy and Environmental Management System at Tata Sponge Iron Ltd. address the twin objectives of environmental protection and maintaining ecological balance. As a part of organization's Environmental Management system, the company conducts EIA (Environmental Impact Assessment) studies by expert external agencies. Based on the EIA observations and outcome of senior management reviews, appropriate strategy is formulated and deployed. Necessary review mechanisms are established to support the precautionary approach to environmental challenges. Process of EMS at Tata Sponge is given below.

ENVIRONMENTAL MANAGEMENT PROCESS







Tata Sponge Iron Limited is the first sponge iron manufacturing company in the country to have been awarded ISO-14001:1996 certificate. Certification to ISO-14001with 2004 version was given in May 2006.

Environmental Policy of Tata Sponge iron Limited is as produced below:

ENVIRONMENTAL POLICY

Tata Sponge Iron Limited is committed to continual improvement in its Environmental performance, activities pertaining to the handling of raw materials, production and dispatch of sponge iron; and generation and evacuation of power, so as to maintain a pollution free, clean and safe environment.

To achieve this, the company shall:

- comply with applicable legal and other requirements relating to its environmental aspects,
- identify the impact of its activities upon the environment,
- prepare and implement an annual environmental improvement plan with targets to meet the objectives and to carry out periodical reviews of its performance, and
- communicate the policy to all persons working for or on behalf of the organization and make it available to public on request

(Suresh Thawani) Managing Director

11/11/08

All the planning stage for expansion and during the operations, the best industry practices for environment protections are deployed. Tata Sponge Iron is fully compliant with all the regulatory norms and conditions. Actual emission data over the years are far below the norms stipulated by MoEF, CPCB and SPCB etc.

Safety, Health & Environment (SHE) is identified as a Key Business Process at TSIL and is formally documented in SHEQ apex manual. With defined 'Roles & Objectives' and 'Operational Control Procedures', entire process is mapped. The same is reviewed through key performance measures for effectiveness and efficiency of the process.





Highlights of Environmental Performance as a support to Business by 'Going Green'

Power generation from waste heat :

Tata Sponge generates 26 MW power by utilization of waste heat of sponge iron production. This power generation replaces fossil fuel based power generation thereby reducing the



emission of GHG, SOx, NOx etc. After meeting the Company's internal power requirement of about 7.0 MW, the balance quantity of power (19 MW) is sold to GRIDCO, the State Electric utility Company.

Power generation from waste heat during last 3 years is given in table below:

Year	Total power generation (KWH)
2005-06	4,02,10,700
2006-07	5,77,54,100
2007-08	16,55,05,300

Reduction in Energy Consumption :

TSIL's drive to reduce energy consumption thro' various initiatives such as introduction of VVVF drives, improvement in power factor, replacing high capacity drives by low capacity ones, replacing higher watt incandescent electric bulbs with low watt energy efficient CFL bulbs, bringing awareness among users to consume less power and the overall focus on conserving power has resulted in a decreasing trend in specific consumption of power in DRI produced.

Specific power consumption per ton of sponge iron production for last 3 years is shown below:

2005-06	2006-07	2007-08
119.10	106.96	102.39

Carbon consumption per ton of sponge iron (reflected in lower coal consumption) has also reduced in last three years. Carbon consumption (C/Fe) is calculated by actual carbon in coal & actual Fe in iron ore used for production of sponge iron.

2005-06	2006-07	2007-08
0.473	0.455	0.451





Usage of high carbon content imported coal :

Besides power generation from waste heat, TSIL has optimized its coal consumption by using imported low ash coal from countries like Indonesia & South Africa, resulting in reduction of Green House Gas emission.

TSIL is **registered with UNFCCC** for its **CDM** project for combating climate change and has achieved an accumulated **carbon credit** benefit of 104334 CERs for its 7.5 MW Waste heat recovery Power Plant. TSIL has also taken initiatiatives to register with UNFCCC its newly constructed waste heat recovery-based power plant of 18. 5 MW capacity as a **clean development mechanism** (CDM) project. This is estimated to **save** the generation of **1,21,603 tons of GHG / annum.** TSIL hopes to reduce 4,10,390 tonnes and 1216030 tonnes of carbon dioxide emissions through 7.5 MW and 18.5 MW power plants respectively over a 10-year crediting period.

During Novemebr, 2008 TSIL has signed an agreement with the Ernst & Young to **devlop carbon foot print** for Tata Sponge.

Water Conservation:

Water conservation activities are covered under following broad areas;

- ✤ Water management system
- Maintenance of water distribution network
- Periodic ascertaining of water quality
- Prevention of water leakages
- ✤ Water re-circulation system
- Clean production process

As a policy, TSIL does not discharge any water / effluent outside its premises and maintains status of **A ZERO effluent discharge company**. Process & cooling water is completely re-circulated in the system. Wastewater thus generated is used for the purpose of road cleaning, coal yard dust suppression, gardening and watering of plants etc. after primary treatment.

The water consumption (KL/Ton of Sponge Iron) is as below:

2005-06	2006-07	2007-08
6.47	5.64	4.85



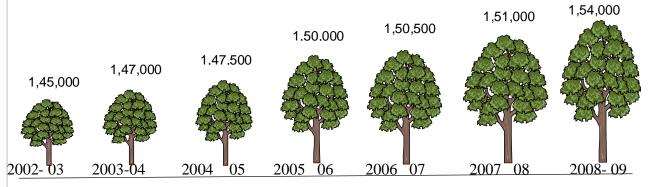


Principle - 8

Undertake initiatives to promote greater environmental responsibility

Afforestation / Tree Plantation :

Tata Sponge has planted around 1,54,000 trees (cumulative number) with survival rate of about 94 %. Today there is hardly any vacant space left for further plantation of trees. The plant, once situated on a barren stretch of land is now transformed unto a green belt. Besides adding to greenery and beautification of the area, the forest so developed owing to massive plantation drive, serves as pollution reduction facility. Plantation of various species include Sandal, Mahogany, Australian teak, White teak, Bamboo, Acacia, Debdaroo etc. has been done. Some rare tree plantation has also been done in the premises. These include Rudraksha, Olive, Silver oak, Tejpatra, Dalchini etc. Given below is the cumulative number of trees planted over the years.



Waste Utilization :

Use of Waste Heat : TSIL presently generates 26 MW power from kiln waste heat, of which about 7 MW power is used internally and balance sold to State Grid.

Use of ESP dust : The ESP waste generated from the DRI plants is used for manufacturing bricks through FAL-G technology. No heat is required for manufacturing of these bricks, thus conserving natural resources such as coal and soil.

Use of Char : The non-magnetic char generated as a solid waste from the DRI plants at TSIL is being stored for power generation by putting up AFBC power plants. The excess char is used for filling up of low lying areas.

Used Oil & Batteries : TSIL does not produce any hazardous waste except used oil and batteries. All the used oil is collected from different user points and sold to authorized dealers (by Central Pollution Control Board-CPCB) for further processing at their end. The same process is followed for used batteries.





Principle - 9

Encourage the development and diffusion of environmentally friendly technology.

Use of cleaner & greener processes :

Tata Sponge iron Limited being in the business of Sponge iron, an industry, infamous for causing pollution, has kept pollution parameters under check by employing environment friendly technologies such as: Electrostatic precipitators (ESPs) [in place of age old Gas Cleaning Plants (GCP)], modern Dust Extraction systems & Chemical dust suppression systems for its raw material processing, product handling circuits, telescopic unloading spouts, vacuum road cleaning machines, Road water sprinklers etc.

In the DRI plant No # 1 (Old plant), the wet Gas Cleaning Plant (GCP) was replaced with Electro Static Precipitator (ESP) with following benefits.

Parameters	Kiln-I with GCP (Before)	Kiln-I with WHRB & ESP (After)
Air emission level from stack	100-110 mg/NM ³	40 mg/NM ³ max.
Volume of gas emission	1,54,000 NM ³ /hr	77,000 NM ³ /hr
Generation of waste water	500 KL/ day	Nil
Generation of Solid Waste	50 MT/day	40 MT/day (Useful dust for brick making)
Generation of power	Nil	7.5 MW

In addition, TSIL has undertaken the following development activities over the years.

- Reduction in CO2 gas by use of imported (low ash and high fixed carbon coal) from 2.0 to 1.9 MT per MT of sponge iron produced.
- Use of alternate energy : TSIL has provided rural electrification in the nearby villages by installing solar powered panels.



TSIL has a policy in place to check vehicles emission at fixed intervals for vehicles entering the plant premises.





- Rain Water Harvesting : Tata Sponge has developed a water reservoir (lake) to collect rainwater in its residential township The contour of the township has been made in such a way that all the rainwater gets collected in the reservoir that looks like natural lake. TSIL has developed a park and has planted trees around the reservoir for improved aesthetic look and has beautified the area with greenery in & around. This area serves as a place for amusement and recreation not only for the township residents but also people from neighbourhood.
- **Telescopic unloading spouts** have been provided at the discharge point of bunkers to control
- fugitive dust in the air. This arrests land contamination material.
- For cleaning of roads, the road vacuum-cleaning machine dust and controls air pollution. Besides, the machine is a deposited dust from the floors of raw material circuits and pipe assembly.
- Chemical dust suppression system is used to reduce chemical is sprayed over the running belt to entrap the flying dust and bring it back on the belt. A significant reduction in the fugitive dust is achieved by this process
 - Total expenditure incurred on account of installation and maintenance of pollution control equipments is as shown below.

Year	Expenditure *	
	(Rs. Million)	
2002-03	18	
2003-04	20	
2004-05	24	
2005-06	22	
2006-07	25	
2007-08	26	





(* Expenditure of power for operation of Pollution control equipments is approximately 20 million per annum apart from above expenditure)





Awards & Accolades :

Following Environmental Awards have been received by Tata Sponge Iron Limited

Assessors	Awards	Rank	Year
TERI	CORPORATE ENVIRONMENTAL AWARD	1 st Prize	2002-2003
Greentech Foundation	Environment Excellence Award	GOLD Award	2002-2003
Greentech Foundation	Environment Excellenc Award	GOLD Award	2003-2004
Confederation of Indian Industries (CII)	SHE award	1 st Prize	2004-2005
Greentech Foundation	Environment Excellence Award	Platinum Award	2004-2005
World Environment Foundation	Golden Peacock Award	1 st Prize	2005
Directorate of Factories & Boilers	Best Environmental award	1 st Prize	2005
Greentech Foundation	Environment Excellence Award	GOLD Award	2006
Srishti Publications	G-Cube Award	Winner Award	2007
Greentech Foundation	Environment Excellence Award	GOLD Award	2007
TERI	CORPORATE ENVIRONMENTAL AWARD	Appreciation	2007
World Environment Foundation	Golden Peacock Award for combating Climate change	Finalist Certificate	2008
Times of India Group & JSW	Earth Care award on GHG Mitigation	Runner Up Award	2008

Policies addressing TSIL environment :

TSIL has following policies in place as a part of its commitment to the environment:

- Environmental policy
- CSR policy
 TPM policy (addressing environment) and
- Mission of the company





Principle 10:

Anti Corruption

ü Business should	ü Consistent with Tata	ü In order to enhance shareholders'
work against	Group purpose & in line	value and promote national
corruption in all	with Tata Code of	interest the company is
its forms,	Conduct, the company	committed to good corporate
including	has a set of defined	governance and to achieve the
extortion and	Values (TSIL)	objectives of this the company
bribery.	T- Trust & respect	follows the principle of
	Social equity	transparency, discloser, fairness,
	I - Integrity	independent supervision, healthy
	L - Loyalty	competition, equal opportunity in
	and an Organisation	employment and compliance all
	culture (WHEAT)	relevant laws, rules & regulation.
	W-Welfare of employees	ü All employees of Tata Sponge
	in surrounding	have signed the 'Tata Code of
	communities.	Conduct' (TCoC). This has also
	H- Honesty in dealing.	been extended to suppliers and
	E- Environment friendly	customers along with the contract
	operations.	for compliance in respect of
	A- Adaptability to	relevant clauses. To re-enforce
	_ changing scenario	company's firm resolve towards
	T- Trust in all its	fostering an ethical environment,
	transaction.	employees are encouraged to
	The clause no 5 of the	raise ethical issues through
	Code of conduct (on gift	Whistle Blower Policy, a formal
	& donation) states that	mechanism for all employees to
	the company and its	make protective disclosures about
	employees shall neither	unethical behavior, actual or
	receive nor offer or make	suspected fraud or violation of the
	directly or indirectly, any	Company's Code of Conduct. The
illegal payments,		disclosures reported are addressed in the manner and
remuneration, gifts,		addressed in the manner and within the time frames prescribed
donation or comparable benefits that are intended		in the policy. The ethics counselor
	or perceived to obtain	
	uncompetitive favours for	personally addresses local contractors and supplier to
	the conduct of its	support them in upholding ethical
	business. Further, the	transactions.
	company shall co-operate	
	with government	
	authorities in efforts to	
	eliminate all forms of	
	bribery, fraud and	
	corruption.	