

Annual Communication on Progress

A. Statement of continuing support to the Global Compact.

The Executive Head Global Compact.

In continuation with the confirmation already made earlier, we reiterate our continuing support for the Ten Principles of the Global Compact. Our Communication on Progress is attached.

Bhaskar Bhat Managing Director Titan Industries Limited April 2010



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Titan Industries Limited

Principles (GRI indicators to help correlation) A. HUMAN PRINCIPLE	Company's Policy & Direction (Approach / Process / Deployment)	Remarks	Data collected from the internal Departments / functions Process facilitator			
Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights:	Titan Industries Ltd follows the International Declaration of Human Rights. Our HR policies reflect, pursue and review these on a periodic basis. All rights are fully protected and respected.	Continuous dialogue and feedback from employees / partners. Surveys from third parties are done for corrective action, if any. The dialogue process is continued with the Franchisee and Contract employees and Trade Partners. Employee Engagement / Dealer Satisfaction Surveys indicate good scores.				
Principle 2	Our HR / IR	Ensuring a healthy	HR / Senior			
Make sure that they are not complicit in human rights abuses.	processes by way of consultative committees are at all times constantly and proactively addressing issues in possible areas of conflict with employees' Unions.	and congenial atmosphere of a "Great Place to Work". The Company continues to be rated as among the best employers in the Country. Stakeholders are consulted frequently in a transparent manner.	Management			
B. LABOUR STANDARDS						
Principle 3 & 4 Business should uphold the freedom of association and the effective recognition of	As stipulated in the various laws in India and as per our Company policy, we have a process of	Periodic	HR / Senior Management			



OUI	Tiplete	Complete.			
	The elimination of all forms of forced and compulsory labour.	Annual / Ponegotiation place, since inception of Company. We are in the process of concluding mutually rewise Agrewith the enunion. Open House 'Tell Me Suin practice encouraged forums of fand discussion.	as are in e the of the the a ewarding ement mployees' es and irveys' are and d as eedback	communications with the Unions and harmonious relationship with employees has led to higher productivity. No evidence of forced labour in the Company.	
	Principle 5 The effective abolition of child labour.	All supply of through the supply character a clause the expresses to Company serious not contractor way emplod labour directly. We also communicate appropriate clause in the contract the labour is not engaged eidirect or inform.	e entire in include at clearly that the hall take e if the in any ys child ectly or ate to our ners g ely the ne nat child ot to be ther in	Communicate -> Monitor -> Review Continuously -> Correct	Integrated Supply Chain team Sales and Marketing functions
	Principle 6 The elimination of discrimination in respect of employment and occupation	The Compa policy on s recruitmen confirmation employmen includes ar understance	election, at and on of at a explicit	The Company employs 122 persons with disability, based purely on merit and qualification and as per rules and processes of the	HR / IR

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equal Company.

Tata Code of Conduct.
With respect to disability, the incumbent shall get the job if she or he fulfills the basic requirements. Diversity is encouraged. Employees are encouraged to report any violations of the Code of Conduct.

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is per the

Our Company's policy meets the Disability Act norms, which though not mandated are followed both in letter and spirit. We support this policy through external industry forums too.

- 1. Studies by UN supported international students, on embedding Human Rights in Titan Industries Limited have been made and is available on request.
- 2. Titan has a specific project MEADOW (Management and Development of Enterprise in Women has significantly enhanced the quality of life in more than 200 underprivileged women of Krishnagiri District in Tamil Nadu, India. The performance of the project is measured through the Tata Index of Human Development

C. ENVIRONMENTAL PROTECTION

Principle 10

Principle 7 The Company is The Company is Environment and traditionally procertified under the Safety Departments Businesses are asked environment and ISO 9001:2000 to support a specific policies and precautoionary and Quality Mgmt. proactive approach guidelines exist to Standards as well as to environmental set direction that ISO 14001 addresses these **Environment System** challenges. Standard and is Principles and go beyond compliance. preparing the report Pirnciple 8 & 9 in line with the Undertake initiatives Third party audits Global Reporting are conducted and Initiative guidelines. to promote greater environmental the Company conforms to ISO. responsibility and; Specific Opportunities For Improvement have Encourage the The Company has development and been identified and also received diffusion of **Environment Awards** action plans are environmentally for exceeding drawn. friendly compliance. technologies. D. ANTI - CORRUPTION AND PREVENTION OF BRIBERY

The Chief Ethics

Chief Ethics Officer

As a TATA Group

all its forms.

and bribery.

including extortion

Officer presents an Annual Report on Ethics issues, compliance and action taken to the Chairman of the Ethics and Compliance Committee (Board of Directors of TIL). The Codes of Conduct have been adequately displayed and is also on the Company's Intranet.

:here is an system

sses on

the 'Management of

Business Ethics' and

all employees sign

the TATA Code of

Conduct. The

Company has a Chief Ethics

Counselor and

location Ethics Counselors in place

The Tata Code of

presented to all

suppliers / Trade

Associates with the

appropriate clause included in the

Agreement for their

across the

Company.

Conduct is

Contract /

perusal and compliance in respect of relevant clauses. The Company follows a 'zero tolerance' policy regarding

this.

/ Location Ethics

Counselors.

Specific 'Gifting', 'Sexual Harassment' and 'Internet' policies are also in place and made available to the employees on the Intranet for easy accessibility.

The above policy and our compliance is periodically communicated to employees at various forums.

