



Promising Reliability For Now and Tomorrow



**GLOBAL COMPACT
ANNUAL COMMUNICATION ON PROGRESS
2014-15**

Company Name:	International Industries Limited	Date:	15.11.2015
Address:	101 Beaumont Plaza 10 Beaumont Road, Karachi, 75530	Membership date:	22.06.2006
Country:	Pakistan	Number of employees:	Over 1000
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Introduction to International Industries Limited

International Industries Limited (IIL) is Pakistan's largest manufacturer of galvanized steel pipes and precision cold rolled steel tubes with an annual manufacturing capacity of 500,000 tons and annual revenues of over USD 170 million. IIL also manufactures premium quality plastic pipe (PE & PPRC) and stainless steel tubes on its state-of-the-art facilities.

IIL is included in a select list of blue chip companies that are listed on all the stock exchanges of the country. Having exported over 90,000 tons of product in 2014-2015 (and over 750,000 tons to date), IIL has a credible export pedigree, an ever-expanding footprint in 50 countries across 6 continents and has won several export awards at various highly prominent fora, including the Karachi Stock Exchange's 'Top 25 companies' award consecutively for 10 years. IIL is also the proud recipient of numerous other awards including the Management Association of Pakistan's 'Corporate Excellence Award' for the Industrial Metals & Mining Sector and the "2015 Environment Excellence Award" by the National Forum for Environment & Health and the 3rd position in a nationwide "OHSE Best Practices 2014" competition organized by the Employers Federation of Pakistan.

Additionally, IIL is one of Pakistan's more reputable corporate citizens. The Company is ISO 9001, ISO 14001, OHSAS 18001, API 5L, API 15LE and CE certified and manufactures its products according to the highest international standards and specifications (ASTM, AS/NZ, BS, EN, SLSA, DIN). Regular surveillance audits by recognized & renowned third parties have proven that all aspects of IIL's Quality & HSE Management System comply with ISO 9001, ISO 14001 & OHSAS 18001 global standards.

Environmental protection remains one of the major priorities of the Company. IIL meets all its energy requirements through co-generation and uses all waste heat to generate chilled water in order to fulfill the water-cooling and air-conditioning requirements at its manufacturing facility. Additionally, IIL has recently commissioned a reverse osmosis plant to help meet additional water requirements. The Company uses 100 foot high fume scrubbers to neutralize its emissions prior to discharge. Furthermore, all effluent waste is treated at its Effluent Treatment Plant (ETP) prior to discharge and sludge generated from the ETP is transferred responsibly to designated landfill sites for environment-friendly disposal.

Workplace safety is a part of IIL's company culture. At all levels IIL employees are imparted regular safety trainings; departments with better safety records are acknowledged and rewarded each month; professional & technical safety advice is made available as required; OHSE committees are in place at the manufacturing floor level as well as the management level; OHSE risks are managed by systematically identifying and eliminating hazards; and emergency response systems are regularly tested and continuously improved.

In addition to this, IIL contributes approximately 2.5% of its Profit after Tax each year towards CSR activities. The main focus of IIL's CSR activities is towards education and health for the underprivileged. To this end, IIL supports a school for underprivileged students as well as a primary health clinic in a low-income residential area in Karachi.

IIL has truly incorporated the prime elements of basic human rights, fair labor practices and environmental responsibility into its culture and approach to business.

Concurrently, in order to achieve its long-term vision, IIL has been actively pursuing opportunities for domestic and worldwide growth. IIL has incorporated a wholly owned subsidiary based in Australia which enables the Company to service this developed market. Furthermore, IIL also offers high quality stainless steel tubes through its wholly owned subsidiary, IIL Stainless Steel Pvt. Ltd. Additionally, IIL owns majority share of International Steels Limited (ISL), the largest manufacturer of cold rolled steel and galvanized steel coils in Pakistan with an annual capacity of 500,000 tons. Each of these organizations will also strive to uphold the main tenants of becoming and remaining model corporate citizens.

With a strong track record behind it and an exciting future to look forward to, IIL is optimistic about its continued growth in the local and international markets.

For further information please visit our website, www.iil.com.pk

Statement of Support

International Industries Limited became a signatory to the United Nations Global Compact (“the UNGC”) with effect from June 22, 2006 and has since remained an active participant. I am pleased to reaffirm IIL’s support of the 10 principles of the UNGC in the areas of human rights, labour, environment and anti-corruption.

In its capacity as a participant of the UNGC, IIL looks forward to building on its existing reputation for respecting basic human rights, engaging in fair labour practices, being environmentally responsible and having a zero-tolerance approach to corruption.

This Communication on Progress (CoP) Report describes IIL’s actions to continually improve the integration of UNGC and its principles into its business strategy, culture and daily operations. IIL also commits to sharing this information with its stakeholders using its primary channels of communication by posting our CoP Report on the UNGC and Company websites.



RIYAZ. T. CHINOY
Chief Executive Officer
International Industries Ltd.
Pakistan

PRINCIPLE 1: BUSINESS SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS

PRINCIPLE 2: BUSINESS SHOULD ENSURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES

Policy:

IIL's adherence to fundamental human rights is enshrined in its Code of Conduct. This policy is available on the Company's website and confirms that "IIL supports and respects the protection of internationally proclaimed human and employment rights" and confirms its commitment to respecting fundamental human rights and treating all employees and others with fairness, equality and respect to foster an open, transparent, and trusting environment which is free from prejudice, discrimination, bias, harassment and/or violation.

IIL is a quality conscious company committed to economies of scale. It continually enhances effectiveness of its quality, environmental, occupational health and safety management systems. IIL is committed to be an ethical company and conforms to all applicable legal requirements, as well as fulfill and exceed the needs and expectations of all stakeholders.

Team work; continuous improvement; prevention of pollution; waste reduction; protection of environment; care for health and safety of people and equipment; safe practices; a fair return to shareholders; and fulfillment of social responsibility are the hallmarks of all activities of the Company.

System:

IIL's business strategy is based on emphasizing the value of respect for human rights. This value is captured effectively in the systems of the following policies and standards:

- Code of Conduct for Good Governance and Ethical Practices
- Health & Safety Management System (OHSAS-18001:2007)
- Environmental Management System (ISO 14001:2004)

Activities:

- The policy on Code of Conduct and Ethical Practices is reviewed and acknowledged each year by all Directors, Managers and staff of the Company. This ensures that respect for human rights remains fully integrated into their business activities. The Code of Conduct covers business ethics, respect for rights of stakeholders, conflicts of interests, accounting records, controls and statements, environment, regulatory compliance and personal conduct.
- IIL is certified for Occupational Health & Safety Assessment Series (OHSAS-18001) since 2007. The reviewed, revised and implemented OHS procedures & manual are followed strictly.
- To manage OHSE hazards and risks effectively, IIL has been divided into zones, based on administrative grounds. Each Zone has an OHSE Team and an OHSE Team Leader. This structure has increased both ownership of the OHSE system and responsiveness to risk situations amongst zonal team leaders and production managers.
- The OHSE function is governed and managed by a dedicated OHSE Section. The OHSE status of the Company is monitored by an OHSE Committee comprising senior managers and chaired by the CEO.

This Committee meets on a monthly basis to analyze OHSE related issues, agree on interventions and thereby achieve and maintain a safe work environment.

- Periodic mock drills are conducted to check effectiveness and adequacy of emergency preparedness & response. Monthly inspections and checks of life-saving & firefighting gadgets are also carried out to ensure they are in proper working conditions.
- OHSE department evaluates and assesses safety performance of service contractors on defined criteria each month. Contractors with excellent to good performance are rewarded while those with unsatisfactory and unacceptable ratings are counseled and trained.
- To ensure public safety, safety cones are provided to dealers to be used during unloading activities. Proper use of these cones reduces the chances of passing vehicles accidentally colliding with parked trucks being unloaded.
- Monthly Safety Walkthroughs are conducted by senior management and observations of unsafe acts and conditions are sent to respective department heads for analysis, and corrective and preventive actions.
- IIL provides medical facilities to all employees through the Social Security Scheme and the Health Insurance Scheme. Additionally, a Doctor and a paramedical assistant are present in the factory 6 days a week on a part time basis to facilitate the employees.
- An equipped ambulance is available at all times at the Factory.
- OHSE Guidelines in the local language, in the shape of booklets, is given to all employees and visitors. This booklet identifies the hazards existing and the safety measures required.
- Safety sign boards for drivers have been installed in the factory. Drivers are given in house trainings on safe driving.
- Use of safety belts while driving has been made mandatory for all employees and visitors.
- Use of personal protective equipment at work is mandatory, including use of safety harnesses while working at height.

Measurable Results or Outcomes:

- In July 2014, the Code of Conduct was circulated to staff and an acknowledgement of having re-read and understood it was taken.
- External surveillance audits were conducted in January 2015 and August 2015 by the company's official certification registrar (M/S Lloyds) to assure compliance with ISO 9001, ISO 14001 and OHSAS 18001 global standards. No major non-conformance was observed during these audits.
- In August 2015, the newly established production unit named Stainless Steel Plant was certified for ISO 9001, ISO 14001 and OHSAS 18001 global standards.
- In September 2015, the OHSE Zonal Team Leaders list was reviewed and revised inducting new members.
- Monthly OHSE Performance Reports were prepared for senior management.
- During the year 134 trainings, on Fire Fighting, First Aid & Rescue, were conducted and 1587 staff were trained.

- OHSE Performance of service contractors was formally assessed and appropriate actions taken.
- Road Safety training by the Motor Way Police was arranged and conducted in May 2015.
- During the year, twelve safety walkthroughs were conducted by senior management and required actions were taken.
- Monthly Inspections of the ambulance were conducted.
- 3000 OHSE guideline booklets were distributed to all permanent and service contractors' employees and visitors.
- Safety awareness boards for drivers indicating critical safety rules related to speed limits, parking, loading, unloading, movements, non-cleaning of vehicles, were installed at different locations of the company.
- OHSE department carried out round the clock monitoring for identification and correction of unsafe acts and unsafe conditions. During the year, 2280 unsafe acts & unsafe conditions identified , communicated and coordinated for rectification.
- No complaint indicating violation of human rights / gender insensitivity received.

PRINCIPLE 3: BUSINESS SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING

Our Commitment or Policy:

IIIL realizes that the collective strength of employees is effective towards the goal of achieving continuous sustainable growth. We provide freedom of association and effective recognition to the right to collective bargaining. We, at IIIL, believe in harmonious relationships with our employees, and ensure fair and transparent HR Policies, leading towards a healthy and productive work culture.

System:

- Every two years, Management and Union enter into bilateral negotiations on Charters of Demands raised by either party and arrive at a mutually acceptable agreement in a mutually supportive environment.
- Workers participation in Management and decision-making is ensured through Workers Management Council & Workers Participation in Management as per law.
- Line managers have been empowered to manage the affairs of their workers and address any concerns in coordination with the Industrial Relations Section.
- There is a dedicated Industrial Relations Manager leading an Industrial Relations Section which is the first port of call for the CBA / Union in case there are any matters that need addressal.

Activities:

- Terms and Conditions of employment (Wages, Compensation & Benefits) of workers are mutually agreed upon through collective bargaining every two years.
- Collective Bargaining Agent elections are conducted every two years as per the local legal requirement.
- Union office bearers are encouraged to participate in trainings / workshops whenever required, and given full opportunity to express their views freely on all fora.

Measurable Results or Outcomes:

- The latest bilateral negotiated settlement was achieved on May 12, 2014.
- The company's performance in 2014 – 2015 was commendable as it achieved the highest production and sales figures ever and this could not have been possible without engaged employees.
- All employees, including unionized workers, received performance related incentive pay.

PRINCIPLE 4: BUSINESS SHOULD SUPPORT THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR

Our Commitment or Policy:

IIL believes in conducting its business following not only all concerned local and international legislations, but also while adhering to its own ethical practices. As such, we abide by the local legislation on forced / compulsory labor and also willingly follow ILO conventions on labor, including Article 2 (1) of the ILO Forced Labor Convention, 1930 (C 29) ratified by Pakistan, and have built human resource systems to ensure abolition of unwanted work or service from any employee.

System.

- **Placement of Offer.** Job offers to the selected candidates are made through official letters.
- **Appointment letter.** Appointment letter containing terms and conditions of employment are given to every employee.
- **Job Descriptions and Communication.** Job descriptions are defined and communicated to employees and updated regularly incorporating change, if any.
- **Exit Interview.** Employees leaving company's employment are encouraged in the exit interview to explain their experiences with the company so that any deviation from defined company policies may be detected and pursued for further improvement.

Activities:

- Every candidate is explained in detail the job requirements, well before placement at the job. If desired by the candidate, 2 to 3 days are also given to the candidate to carefully go through the job offer before accepting it.
- Care is taken to ensure that jobs undertaken at other times like transfer or promotion are understood including performance expectations and working conditions.
- Job Descriptions / Work Instructions are live documents at IIL which are not only made available for all employees but are also continuously being updated to match changing roles.
- Exit interview report is shared with senior management by the Head of Human Resources. Suggestions / grievances, if any, are forwarded to concerned managers for required action. Separating employees are also requested to openly discuss drawbacks of HR policies and procedures and the same are assessed and revised, if required.

Measurable Results or Outcomes:

- All new employees formally accepted job offer, terms and conditions of the job and Job Descriptions. These records maintained by the Human Resources Department.

PRINCIPLE 5: BUSINESS SHOULD SUPPORT THE EFFECTIVE ABOLITION OF CHILD LABOUR

Our Commitment or Policy

IIL supports effective abolition of child labor. This principle is also a local legislation whereby a minimum age of employment is defined. This principle is also enshrined in ILO's Convention 59 on Minimum Age (Industry) Requirement subscribed by Pakistan. IIL adheres strictly to the minimum age requirement and also ensures this is upheld by our Direct and Indirect Contractors.

System:

- IIL follows a strict policy condemning Child Labor in all its forms. To avoid risk of any mishap, no minor is allowed to enter our factory premises.
- Employment / Trainings in all its forms (including Apprenticeship Trainings) require candidates to submit their National Identity Card proving their age is at least 18 years.

Activities:

- Diligent checks and monitoring of job applicants' age through our procedures is made to ensure that we comply with all legal age requirements.
- Notices are prominently displayed at all gates stating the restriction on child labor and announcing that no employment is offered to persons below 18 years of age.

Measurable Results or Outcomes:

No child labor is present in our organization due to our stringent monitoring.

PRINCIPLE 6: BUSINESS SHOULD SUPPORT THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION

Our Commitment or Policy

ILL continues to support the elimination of discrimination in respect of employment and occupation. This commitment is strongly embodied in our explicitly written human resource policies on recruitment, code of conduct, etc. Our adoption of the “Code of Conduct for Good Governance”, and practices at IIL demonstrate our support for the elimination of discriminatory behavior in respect of employment.

System:

- As manifested in our Recruitment Policy:
 - The Company operates as an equal opportunity employer, and does not give any preference on the basis of gender, religious or ethnic background when employing or promoting employees. All employment and promotions will be purely on merit and suitability for the position.
- Our policy on Code of Conduct for Good Corporate Governance clearly states:
 - Employees shall not discriminate against any other employee, especially with regard to origin, religion, gender or language.
 - Sexual harassment shall result in serious disciplinary action and charges may be raised against any employee (irrespective of gender) if found guilty by the Management after full investigation of the matter.

Activities:

We consciously recruit, hire, develop and promote employees. These values are inculcated in our employees through training and other awareness campaigns.

Measurable Results or Outcomes

ILL has taken conscious efforts to eliminate discrimination by following its policy guidelines. We have employees not only of both genders, but also from various religions, casts and origins and they are accorded fair treatment at all levels.

PRINCIPLE 7: BUSINESS SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES

Our Commitment or Policy

IIL fully supports a precautionary approach to environmental challenges. Our Quality, Environmental Health & Safety policy states:

“IIL is a quality conscious company committed to economies of scale. It shall continually enhance the effectiveness of its quality, environmental, occupational health and safety management systems. IIL is committed to be an ethical company and shall conform to all applicable legal requirements, as well as fulfill and exceed the needs and expectations of all stake holders.

Team work, continuous improvement, prevention of pollution, waste reduction, protection of environment, care for health and safety of people and equipment, safe practices, a fair return to shareholders and fulfillment of social responsibility shall be the hallmark of all activities.”

System

- IIL has achieved certification of ISO-14001 in year 2000, and became the first company in Pakistan’s Steel Sector to achieve this Certification.
- IIL has implemented the ISO 14001 Environment Management System and environmental protection remains one of the major priorities of the Company.
- IIL’s environmental performance is managed through the implementation of its business planning process, compliance systems, risk management practices, governance programs and management review.
- The company is committed to carry out its business in an environmentally sound and sustainable manner and promote preservation and sustainability of the environment.
- All employees are required to adhere strictly to all applicable environmental laws and regulations that impact the company’s operations.

Activities:

- Occupational Health, Safety and Environment issues are addressed at the highest level. The OHSE Committee is composed of senior operational managers and chaired by the CEO. It is scheduled to meet once a month.
- IIL is dedicated to reducing the impact of its operations to sustainable levels and in line with acceptable standards. It neutralizes its emissions prior to discharge by using 100 feet high fume scrubbers; all effluent waste is treated at its Effluent Treatment Plant (ETP) prior to discharge; whereas sludge generated from the ETP is transferred responsibly to designated landfill sites for environment-friendly disposal.
- IIL is registered with the Ministry of Environment under the Self-Monitoring and Report Tool (SMART) program.
- IIL has documented, implemented and maintained the procedure of “Emergency Preparedness and Response” to handle any safety and environmental emergencies.

- IIL has developed, established and maintained procedures for identification of Environmental Aspects, Occupational Health, Safety and Environment Legal and Regulatory requirements, in which detailed mechanism and responsibilities are assigned to identify the environmental aspects and their impacts related to the activities / processes and products of IIL.
- IIL has maintained the “Register of Aspect and Impact” for its activities, processes and products and conducts “Environmental Reviews” at prescribed frequency. The higher rated aspects are inducted in the main objectives of the Company for which plans are made in order to achieve targets.
- IIL has also developed and implemented a procedure for “Incident Investigation, Non Conformance, Corrective and Preventive Action”. Incidents are comprehensively investigated and appropriate corrective and preventive actions have been taken as per procedure.
- With our EMS system we conduct various regular, planned activities such as periodic environmental reviews, environmental risk assessment, internal and external audits, self-assessments, training and awareness programs and campaigns - all in compliance with the local environmental standards like National Environmental Quality Standards and Environmental Protection Agency.
- For stepping towards paperless environment during this year we will ensure optimal use of scanner and minimal use of printer thereby targeting a 25% reduction in paper consumption and printer ink consumption.

Measurable Results

- The OHSE Committee comprises eight permanent members including the CEO as Chairman and Divisional Manager Operations, Divisional Manager Manufacturing, Senior Manager OHSE, Senior Manager Supply Chain, Senior Manager Security, Senior Manager Industrial Relation & Admin, Manager Projects as members. This committee meets each month.
- Controls were imposed on possible excess use of paper and a reduction of 38% was achieved in use of printing paper in computers and 12% in use of printing paper in photocopying through increased use of scanners, using both sides of a paper sheet, and shredding used paper and making it available for recycling use as packing material.
- Periodical testing of IIL’s effluents and factory and vehicular emissions was carried out through third parties and recognized laboratories for compliance with the National Environmental Quality Standards (NEQS). All results were within normal ranges.
- Daily (6 times / day) in-house effluent testing and monitoring of various parameters are carried out before discharge.
- IIL conducted four drills during the year.
- Safety alerts on OHSE issues, such as heat stroke, rains, cyclones, earth quake, Dengue virus & Congo virus etc, circulated amongst all staff.
- Anti-mosquito spray conducted twice daily.
- Register of Aspect and Impact assessment of Steel Factory, Plastic Plant, Stainless Steel Plant , Head Office & North Office updated during the month of February 2015.
- Electricity, water and natural gas consumption were monitored on a monthly basis in various sections of the plant.
- Energy Conservation: After the installation of tri-generation system based on combined cooling, heating and Power with 4 MW gas engines coupled with installation of vapor absorption chillers IIL has reduced 21% of gas and 6% of electricity consumption per ton of pipe production.
- Waste hot water was utilized to generate chilled water, which in turn, fulfilled the factory’s water-cooling and air-conditioning requirements. Furthermore, our recently commissioned Reverse Osmosis Plant helped meet additional water requirements at the factory premises.

- IIL generates electricity through co-generation. Its own needs are met through this generation and excess electricity is transported to the KESC grid. Hence, there is full utilization of installed generation capacity and generation of additional revenues, whilst contributing to alleviate the chronic power shortage faced by the country
- As a result of its efforts, IIL was awarded the 2015 Environment Excellence Award by the National Forum for Environment & Health and the third position in a nationwide OHSE Best Practices 2014 competition organized by the Employers' Federation of Pakistan

PRINCIPLE 8: BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY

PRINCIPLE 9: BUSINESS SHOULD ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES

Our Commitment or Policy

Our support to the environmental challenges is further affirmed through initiatives promoting greater environmental responsibility. This affirmation is re-demonstrated through our Corporate Social Responsibility (CSR) activities and company's values as mentioned below:

Ethical: IIL is honest and ethical in its dealings at all times through compliance to the applicable laws & regulations.

Excellence: IIL endeavors to exceed the expectations of all stakeholders.

Innovation: IIL encourages its employees to be creative and seek innovative solutions.

Respect: IIL values the self-esteem of all stakeholders, be it employees, suppliers, customers or shareholders.

Fairness: IIL believes in fairness to all stakeholders.

Responsibility: IIL considers quality health, safety and the environment an integral part of its activities and way of life.

Reliability: IIL has established itself as a reliable and dependable supplier.

System

IIL's explicitly written Quality and Environmental Policy ensures its commitment towards its environmental responsibilities.

Activities:

- We have laid the foundation of a sustainable business. All aspects of sustainability including efficient operational procedures, effective internal controls, ethical behavior and energy conservation are an integral part of our business model
- IIL contributes approximately 2.5% of its Profit after Tax towards CSR activities. The primary focus of IIL's CSR activities center around the arena of education and health for the underprivileged
- Each month a Health, Safety & Environment presentation is made to Senior Management on the month's incident trend and a brain storming session ensues for improvement and avoidance of similar incidents. Different statistical tools & parameters are used for better analysis of OHSE performance.
- As required by our Quality Management System, we prepare annual Environment, Health & Safety Objectives and Targets along with the Plan of Action to achieve these targets. The status is reviewed on bi-annual basis in Q&HSE meeting.
- Occupational Health Safety Environment Committee meeting is conducted on monthly basis which is headed by the Chief Executive Officer.
- IIL appreciates employee suggestions for improvement of health, safety and environment procedures in production plants and other possible areas. On review when an employee's suggestion is thought to be feasible, he is given a cash award and is declared employee of the month.
- Internal/external environmental audits are carried out as per planned intervals.
- Sludge being generated from Effluent Treatment Plant is disposed off at a dedicated land fill site for environment friendly disposal.

Measurable Results or Outcomes

- Due to our regular monitoring, self-assessments and compliance with environmental regulatory standards, IIL has received no complaints from its neighbors.
- On CSR, IIL has linked up with The Citizens Foundation and continues to support all operating expenses for a TCF primary school in the vicinity of the IIL factory. The TCF-IIL Campus provides free/affordable education to almost 400 students. IIL has also funded the construction and operating expenses of a mosque in the Landhi area.
- Additionally, IIL has taken the first step towards establishing a health clinic in Landhi in association with SINA Health, Education & Welfare Foundation. The IIL-SINA Clinic is expected to be operational by February 2016 and will provide free medical facilities to the community living in the vicinity of the factory. IIL has funded the land purchase, and will fund the construction of the building, and part maintenance of the clinic.
- IIL has also sponsored the Amir S Chinoy Amphitheatre at the IBA Main campus.
- Steel is 100% recyclable, meaning it can be reprocessed into the same material multiple times. Recycling accounts for significant energy and raw materials savings. More than 1,400 kg of iron ore, 740 kg of coal and 120 kg of limestone are saved for every ton of steel scrap made into new steel.
- IIL's recently commissioned Reverse Osmosis Plant helps meet additional water requirements at the factory premises.
- IIL generates electricity through co-generation. Its own needs are met through this generation and excess electricity is transferred to the K Electric grid. Hence, there is full utilization of installed generation capacity and generation of additional revenues, whilst contributing to alleviate the chronic power shortage faced by the country.
- During the year eight employees were declared Employee of the Month for their suggestions on improvement of health, safety and environment procedures in production plants and other areas.
- Sludge being generated from Effluent Treatment plant is transferred to Landfill site on twice a month basis by third party and acknowledgment slip is issued by District Government after receiving the sludge.

PRINCIPLE 10: BUSINESS SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY

Our Commitment or Policy

We support this UNGC principle against corruption, and are striving to work against corruption, extortion and bribery in all its forms, as communicated through our policy on Code of Conduct.

System

A detailed policy addressing all employees to observe the Code of Conduct has been adopted. Relevant extracts with specific focus on elimination of corruption and bribery are indicated as under:

- Every employee should conduct his / her personal and business affairs in such a manner that neither a conflict nor the appearance of a conflict, arises between those interests and the interests of the Company.
- The employees shall be careful while dealing with personal or business associates and not disclose, divulge or provide any information regarding the company to anyone except where the same is used as a part of his/ her official obligations and as required for official purpose and shall abide by the Closed period announced by the company from time to time and also sign a Non- Disclosure Agreement if the need arises.
- All employees should avoid any kind of bribery, extortion and all other forms of corruption.
- Employees should always be cognizant of the need to adhere strictly to all safety policies and regulations.
- Any legally prohibited or controlled substances if found in the possession of any employee will be confiscated and where appropriate, turned over to the authorities.
- All employees are required to comply with this code of conduct and are personally responsible for doing so. Employees must comply with any rules set out in this code of conduct. Breach of any principles within the code may result in disciplinary action and a serious breach – such as if any employee is found to be in wanton abuse of the code and their action cause reputational risk or damage or financial loss to the business – may amount to gross misconduct which may result in summary dismissal. Further, the company reserves the right to seek redress and damages from such individuals.

How do you intend to make this COP available to your stakeholders?

This COP available to our stakeholders at our company website www.iil.com.pk.