



**Year: March 2015 to February 2016**

## **STATEMENT OF CONTINUED SUPPORT:**

Since its inception in 1922, Attock Refinery Limited (ARL) has been taking keen interest in economic elevation, social cohesion, ethical consideration and environmental friendly impact of our activities on various stakeholders. To achieve this objective, we have been following the triple P approach i.e. People, Planet & Profits.

The call of the United Nations Global Compact (UNGC) to corporate sector companies is a noble undertaking to embrace, support and enact, within their sphere of influence in four areas of Human Rights; Labour, Environment and Anti-Corruption. In this realm, ARL has adopted UNGC ten principles which make meaningful difference by developing holistic approach for society and future generations.

In pursuance of compliance with the UNGC principles, it is our privilege to confirm that ARL's strategic planning and development towards sustainability is based on diversification, competitiveness, transparency of our operations complying with all the pertinent and applicable national and international laws, rules, regulations and standards, environmental protection, synchronized community and social responsibility services.

We also realize that integrated approach to manage diverse issues is a daunting task, especially to embark on patrolling of boundaries between legal and illegal, ethical and unethical, right and wrong, fair and unfair. In order to work within the defined boundaries and eliminate barriers to innovative ideas, ARL business practices are aligned with our deeply embedded core values. We believe that it is not a onetime stand, rather a continuous and enduring journey to achieve wholesome success.

ARL reiterates its resolve towards best global practices to remain on the forefront of a socially responsible company through strict adherence of UNGC guiding principles.

**March 01, 2016;**

**M. Adil Khattak, Chief Executive Officer**

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## **Brief description of nature of business**

ARL is the pioneer of crude oil refining in the Region with its operations dating back to 1922. Backed by a rich experience of almost 100 years of successful operations, ARL's plants have been gradually upgraded / replaced with state-of-the-art hardware to remain competitive and meet new challenges. We have today grown into a modern state-of-the-art refinery with a projected capacity of 54,000 bpd by June this year.

ARL is one of the unique refineries in its operations as it refines 40 different types of crude oils with API 12 to 65. ARL produces a complete range of petroleum products from LPG to Asphalt including specialty products such as Jet Fuels (Jet A 1, JP-4, and JP-8), Cutback Asphalts, Polymer Modified Asphalt, Mineral Turpentine Oil, and Solvent Oil.

PRINCIPLE 1	BUSINESS SHOULD ENSURE THAT THEY ARE NOT COMPLACENT IN HUMAN RIGHTS ABUSES
Actions	<p><b>Actions taken</b></p> <p><b>Commitment:</b> ARL recognizes and respects internationally recognized human rights and supports the observance &amp; compliance of these rights. Our commitment for acknowledging human rights is evident from our HR Policies, Core Values, Code of Gender Justice, Policy of Ethics and Business Practices alongwith various initiatives taken for protecting human rights.</p> <p><b>System:</b> ARL firmly believes in carrying out our business in accordance with high ethical, legal, and safety standards.</p> <p>Recognizing the basic human rights of association, a well-defined mechanism of determining the Collective Bargaining Agent (CBA) has been set in place whereby workers elect their labor representatives and office bearers. We have also implemented the Code of Gender Justice and the Policy of Ethics and Business Practices in compliance with UNGC principle.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"> <li>• Compliance in letter and spirit with all the applicable provisions of relevant national and international statutes.</li> <li>• Standing Committee on Gender Justice is effectively addressing all gender based issues.</li> <li>• We have Values and Ethics Committee to address any issue relating to violation of these aspects.</li> <li>• ARL being a Socially Responsible Company frequently organizes seminars/workshops, which depicts its commitment to social obligations.</li> <li>• Safe and healthy working conditions beyond legal compliance are provided to employees</li> <li>• There is freedom of association to workers for expressing their voice and referendum is conducted to determine CBA after every 2 years as per statutory requirements.</li> <li>• We have been following policy of non-discrimination in HR practices.</li> <li>• We discourage forced labour or child labour in any form, and provide access to basic health, education and housing to the workers and their families.</li> </ul>
Outcomes	<p><b>Measurement of (expected) outcomes and value added for our Company</b></p> <ul style="list-style-type: none"> <li>• Stakeholders' Trust - our efforts have earned recognition of stakeholders through bestowing of UN Global Responsible Business Awards in 2010 and 2011. ARL has been placed at judging panel of Best Sustainability Report Award after successive winning of this award.</li> <li>• No non-compliance issue of country's labour laws – labour inspection authenticates our efforts.</li> <li>• Exemplary relations between Management and labour union.</li> <li>• Workers' right of association guaranteed.</li> <li>• Values based organizational culture</li> </ul>

PRINCIPLE 2	BUSINESS SHOULD ENSURE THAT THEY ARE NOT COMPLACENT IN HUMAN RIGHTS ABUSES
Actions	<p><b>Actions taken</b></p> <p><b>Commitment:</b> ARL believes that transparent legal system is a fundamental element of a healthy society and growing economy and we support strong enforcement structures to protect citizens against abuse of power.</p> <p><b>System:</b> ARL feels pride in being signatory of the Ethics Policy at the platform of Oil Companies Advisory Committee (OCAC) along with other members from Oil and Gas Sector of Pakistan. The objective is to abide by the highest ethical standard, observe regulations applicable to the industry and laws of the country, conduct business with integrity and honesty, treat stakeholders fairly, communicate openly but in a responsive &amp; accountable way.</p> <p>Furthermore, to prevent human rights abuses, workers have their representatives (office bearers) in each department to register any such abuse for which management has high concern to address and resolve. Human rights abuses in the form of forced labor and child labor are strictly discouraged at ARL.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"> <li>• We review our HR practices in the light of changes made in national and international human rights and labour laws to ensure our commitment with protecting human rights.</li> <li>• Workers exercise the freedom of association as per their free will. The process of Union's internal elections, referendum for CBA determination, and other related activities are facilitated by ARL to promote this right of workers</li> <li>• ARL participates in different seminars and training in collaboration with Directorate of Worker's Education, Government of Pakistan and other organizations to sensitize workers about their rights.</li> <li>• Strict Compliance with Factories Act, 1934 and Bonded Labor System (Abolition) Act, 1992 is ensured.</li> </ul>
Outcomes	<p><b>Measurement of (expected) outcomes and value added for our Company</b></p> <ul style="list-style-type: none"> <li>• Stakeholders' Trust - our efforts have been recognized through bestowing of UN Compact Award for Responsible Business Practices and Best Sustainability Report Award. ARL has been placed at judging panel of Best Sustainability Report Award after successive winning of this award.</li> <li>• No non-compliance issue of country's labour laws – labour inspection authenticates our efforts.</li> <li>• No child labour employed.</li> <li>• Full adherence to grievance resolution process.</li> <li>• Complete elimination of Bonded Labour even through service providers.</li> <li>• Health &amp; Safety is considered to be the area of prime importance.</li> <li>• Annual Leave accumulation is allowed upto five years, with an annual leave encashment policy of leftover leaves above the accumulated quota.</li> <li>• Working conditions are so conducive at ARL that none of our worker has left the Company on resignation during the last seven years.</li> </ul>

PRINCIPLE 3	BUSINESS SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING
Actions	<p><b>Actions taken</b></p> <p><b>Commitment:</b> Maintenance of congenial atmosphere at work place is utmost priority of ARL. We consider the freedom of association and freedom of choice as workers' undeniable rights.</p> <p>The company supports, facilitates, and ensures the workers' right of the freedom of association and the effective recognition of the right to collective bargaining as per national laws.</p> <p><b>System:</b> The workers are represented through their Trade Unions; out of the registered trade unions, one is elected through a referendum (held under the auspices of Labour Department, Government of the Punjab) by the workers to represent them as Collective Bargaining Agent (CBA). The Company puts no restriction on unionized employees for participating in these activities.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"> <li>• ARL facilitates the process of periodic elections of workers Unions and the referendums for determination of CBA in coordination with Labour department, Government of Punjab for ensuring impartiality and transparency of the process.</li> <li>• Workers' terms and conditions are determined through a process of bilateral negotiations between CBA and the Management. After receipt of charter of demands from the CBA, the settlement is arrived which is signed by both parties for two years' term.</li> <li>• Workers' involvement in decision making process is ensured through their representation in Joint Management Board and Worker's Participation in Management and various other committees.</li> <li>• Workers have unfettered rights to enjoy the benefits guaranteed to them under the law, rules, settlement, agreement, award aligned with the principle of social justice.</li> <li>• The ARL Management and CBA promote and foster an atmosphere of trust, confidence and understanding for each other's view point to avoid any damaging conflict to arise and all conflicts are resolved through bilateral negotiations at the establishment level in amicable way.</li> </ul>
	<p><b>Measurement of (expected) outcomes and value added for our Company</b></p> <ul style="list-style-type: none"> <li>• The relations between workers' Union and the Management are based on the principles of mutual trust, mutual respect, and open communication. At ARL, we consider our workers as partner in continued success &amp; profitability and an asset for our Company.</li> <li>• Stakeholders' Trust - our efforts have been recognized through bestowing of UN Compact Award for Responsible Business Practices and Best Sustainability Report Award. ARL has been placed at judging panel of Best Sustainability Report Award after successive winning of this award.</li> <li>• No non-compliance issue of country's labour laws – labour inspection authority authenticates our efforts.</li> <li>• Exemplary relations between labour union and the Management.</li> <li>• Workers' right of association is guaranteed.</li> <li>• Values based organizational culture.</li> </ul>

PRINCIPLE 4	BUSINESS SHOULD SUPPORT THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR
Action	<p><b>Actions taken</b></p> <p><b>Commitment:</b> ARL recognizes and respects internationally recognized principles and standards of fair labour practices and supports their observance &amp; compliance. Our commitment for acknowledging fair treatment is evident from our well defined HR Policy, Core Values, Code of Gender Justice, and Policy of Ethics &amp; Business Practices etc. We denounce all forms of forced and compulsory labour.</p> <p><b>System:</b> We have consistently been following the policy of adhering with all laws &amp; regulations and generally set a standard well above the minimum legal requirements. At ARL, there is no concept of getting any kind of forced or bonded labour; all employees are paid minimum wage as per applicable ordinance and their terms and conditions are well set out in relevant documents. Work timings have been defined in accordance with the provisions of labour laws and proper rest is allowed between the shifts. We care for the work-life-balance of our staff. In order to avoid excessive overtime hours, we have established a "Time Office" that maintains time records, payroll and production records for review on a regular basis.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"> <li>• We strictly comply with relevant provisions of Factories Act 1934 and Bonded Labor System (Abolition) Act, 1992.</li> <li>• We have an elaborative policy of Ethics and Business Practices. ARL being a Socially Responsible Company conducts seminars/workshops, which depicts its commitment to the above social obligation.</li> <li>• Proper shift rotas have been defined and excessive overtime work is discouraged. Overtime done is however paid at double the normal rates of wages.</li> <li>• Work-life-balance of staff is maintained.</li> <li>• Sports and other activities are provided to workers in the shape of club and annual sports gala organized by the Company round the year.</li> </ul>
Outcomes	<p><b>Measurement of (expected) outcomes and value added for our Company</b></p> <ul style="list-style-type: none"> <li>• ARL is considered as one of the workers' friendly company and not a single example is available of any forced and compulsory labour here. The service providers/contractors are specifically observed for abolition of Forced and Compulsory labour.</li> <li>• Stakeholders' Trust - our efforts have been recognized through bestowing of UN Compact Award for Responsible Business Practices and Best Sustainability Report Award. ARL has been placed at judging panel of Best Sustainability Report Award after successive winning of this award.</li> <li>• No non-compliance issue of country's labour laws – labour inspection authenticates our efforts.</li> <li>• Exemplary relations between labour union and the Management.</li> <li>• Values based organizational culture.</li> </ul>

PRINCIPLE 5	BUSINESS SHOULD SUPPORT THE EFFECTIVE ABOLITION OF CHILD LABOUR
Actions	<p><b>Actions taken</b></p> <p><b>Commitment:</b></p> <p>ARL is committed to abide by local and international laws for abolition of child labour</p> <p><b>System:</b></p> <p>ARL has well defined policy of recruitment wherein minors can't be employed. ARL neither engages in employment of children nor supports child labor. The Company respects and adheres to the International Labour Organization (ILO) convention regarding minimum age of employees.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"> <li>• We have database for each category of employees with their authentic birth dates.</li> <li>• The Company sensitizes its members on this important aspect through various means like focus groups discussions, meetings, seminars etc.</li> <li>• We have commitment on the restriction of employment below the age of eighteen.</li> </ul>
	<p><b>Measurement of (expected) outcomes and value added for our Company</b></p> <ul style="list-style-type: none"> <li>• ARL has earned good reputation by complying with the minimum age requirement. We do not employ anybody without valid National Identity Card which is a legitimate proof of his/her attaining the age of majority.</li> <li>• Stakeholders' Trust - our efforts have been recognized through bestowing of UN Compact Award for Responsible Business Practices and Best Sustainability Report Award. ARL has been placed at judging panel of Best Sustainability Report Award after successive winning of this award.</li> <li>• No non-compliance issue of country's labour laws – labour inspection authority authenticates our efforts.</li> </ul>
Outcomes	

PRINCIPLE 6	BUSINESS SHOULD SUPPORT THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION
Actions	<p><b>Actions taken</b></p> <p><b>Commitment:</b></p> <p>ARL is committed to eliminate discrimination and promote equality and diversity in respect of employment and occupation through its policies, practices and procedures.</p> <p><b>System:</b></p> <p>ARL prides in pronouncing itself as an equal opportunity employer. The company does not discriminate in hiring, promotion, compensation, development on the basis of gender, race, colour, or religion. ARL is one of the few companies in Pakistan which has adopted the Code of Gender Justice at Work Place in Pakistan to create conducive working environment for men and women, free of any harassment, abuse and intimidation.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"> <li>• In our meetings and general policy discussions, the management reiterates its commitment to the equal opportunity principle.</li> <li>• The Company Management frequently sensitizes its new as well as existing employees through focus groups discussion, meetings and sessions on the aspect of diversity and equal opportunity.</li> <li>• The Company maintains diversity of its workforce and has employed from different regions, religions, casts, genders and creeds.</li> <li>• All our job advertisements consistently express our commitment to the principle of equal opportunity employment.</li> </ul>
	<p><b>Measurement of (expected) outcomes and value added for our Company</b></p> <ul style="list-style-type: none"> <li>• As a result of sensitization on this important aspect, not a single complaint was referred to ARL Gender Harassment committee during the year 2015 - 2016. It shows that all segments of population are working amicably at ARL.</li> <li>• No complaint has been received / filed during the period under report with respect to discrimination on account of gender, race, colour, or religion in our performance management process.</li> </ul>

PRINCIPLE 7		BUSINESS SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES	
Actions	<b>Actions taken</b>		
	<b>Commitment:</b>  ARL is an environmental conscious company and strongly believes on the philosophy “that prevention is better than cure”. In this regard, we are committed to adopt precautionary rather than preventive approach by taking early actions to ensure that irreversible environmental damage could not occur.  <b>System:</b>  ARL has implemented a well-defined Environmental Management System (ISO-14001), where we have clearly defined procedure of hazard identification and risk assessment (OHS-PR001). The procedure defines ARL precautionary approach towards systematic assessment of risk, risk management and risk communication at appropriate levels.  <b>Activities:</b> <ul style="list-style-type: none"><li>• ARL has Health, Safety, Environment and Quality (HSEQ) policy endorsed by the Company’s Board of Directors, which clearly reveals our commitment to prevention of pollution and care for environment.</li><li>• Hazard identification and risk assessment is conducted for all operations of the refinery. The hazards identified include environmental, safety, chemical, physical, psycho-social, hygiene, ergonomics and fire etc. On the basis of identified hazards, potential consequences are determined quantitatively, which further classifies the hazard as high, medium and low risk.</li><li>• A quality council committee headed by CEO reviews the application of precautionary approach like hazard and risk assessment on defined frequency bi-annually.</li><li>• The implementation of hazard and risk assessment is also assessed by the internal and third party auditors.</li><li>• Ambient air quality is monitored to see if there are any adverse impacts of ARL operations to the surrounding community to take any precautionary measures, if required.</li><li>• Monthly environmental monitoring of air emissions and effluent water to check the National Environmental Quality Standards (NEQS) are met.</li><li>• Environmental Impact Assessment (EIA) &amp; Public hearing sessions are carried out for all new projects to address any future concerns of nearby community regarding environment.</li><li>• Central Health, Safety and Environment Committee (CHSEC) meets on monthly basis headed by CEO to revitalize company’s commitment to Health, Safety &amp; Environment.</li><li>• To go beyond legal compliances, ARL has targeted to maintain at least 3- star rating this year as per British Safety Council (BSC) Five Star Environmental Audit Rating Program which is wider in scope for maintaining environmental management system.</li></ul>		
Outcomes	<b>Measurement of (expected) outcomes and value added for our Company</b>		
	Precautionary approach provides us the guidelines to tackle environmental challenges in a much better & effective way. It also provides the basis for preparing our short-term and long-term environmental improvement plans & targets.		

PRINCIPLE 8	BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY
Action	<p><b>Actions taken</b></p> <p><b>Commitment:</b></p> <p>ARL believes in the ‘triple bottom line’ of sustainable development – environmental quality, economic prosperity and social equity. We are committed to promote greater environmental responsibility guided by ARL’s Vision, HSEQ policy and initiatives integrated with all elements of business planning and decision-making for fostering openness and dialogue with employees and public.</p> <p><b>System:</b></p> <p>In line with Company’s Vision and mission, ARL’S Corporate Targets for sustainable development are annually set. All environmental, social and economic initiatives, targets and achievements are then published in Annual Sustainability Reports.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"> <li>• ARL believes in transparent business practices. We publish annual sustainability report as per the guidelines of Global Reporting Initiatives (GRI) and Accountability 1000 (AA-1000). The report provides environmental, social and economic initiatives, targets and achievements of ARL. It also includes stakeholder needs and our response. The report is shared with all stakeholders and is also uploaded on our website (<a href="http://www.arl.com.pk">www.arl.com.pk</a>).</li> <li>• In compliance to our sustainable business strategy, ARL has voluntarily implemented Management Standards like Quality Management System (ISO 9001), Environmental Management System (ISO 14001), Occupational Health and Safety (OHSAS 18001) and Energy Management System (ISO 50001).</li> <li>• ARL transparent sustainable practices are endorsed in the form of prestigious ACCA-WWF Best Sustainability Report Award for three consecutive years (2007-2009) that lead ARL on the judging panel of ACCA-WWF from 2009. In 2013, ARL again awarded with Best Sustainability report award by ACCA-WWF.</li> <li>• ARL transparent sustainable practices and sustainability reporting were also being awarded by ICAP-ICMP Pakistan in year 2012, 2013 and 2014.</li> <li>• We engage the neighbouring education institutes, environmental protection agency, community organizations and customers to celebrate world events like World Environment Day, World Biodiversity Day, and Earth Day.</li> <li>• We also arrange events like HSE conference on each alternate year, Environment Gala, Tree plantation campaigns etc. to create awareness among our stakeholders and promote sustainable environmental development.</li> <li>• The company has developed a biodiversity park with the name of “Morgah Biodiversity Park” in collaboration with UNESCAP for the conversation of biodiversity of the region.</li> <li>• The company supports and collaborates with the neighbouring institutes like National University of Science and Technology (NUST) Islamabad, Ghulam Ishaq Khan Institute (GIK) Topi-Swabi etc. in projects related to energy and environment.</li> </ul>
Outcomes	<p><b>Measurement of (expected) outcomes and value added for our company</b></p> <ul style="list-style-type: none"> <li>• All these initiatives have not only given a green image of ARL to the stakeholders but also self-satisfaction that we are running business on a sustainable basis with greater environmental responsibility.</li> <li>• Environmental stewardship has resulted not only in the promotion of company reputation but also helped in the reduction of resource consumption and overall profitability. The most notable example is the reduction in the refining cost and saving of energy achieved due to implementation of ISO-50001:2011 (Energy Management System).</li> <li>• Giving practical exposure to the future engineers and scientist in the fields of environment and energy not only to enhance their own skill level but also beneficial for the company.</li> </ul>

PRINCIPLE 9		BUSINESS SHOULD ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES	
Actions	<b>Actions taken</b>		
	<p><b>Commitment:</b> ARL is fully committed to adopt all environmental friendly technologies which are applicable in the country. Our mission states “we will utilize best blend of state-of-the-art technologies, high performing people, excellent business process and synergetic organizational culture thus exceeding expectations of all stakeholders”.</p> <p><b>System:</b> At ARL, we have well defined environmental treatment mechanism. This mechanism applies to the whole operation of refinery including gaseous emissions, effluent water, recycling of wastewater, solid waste disposal, oily sludge and incineration of hazardous wastes.</p> <p><b>Activities:</b></p> <ul style="list-style-type: none"><li>• Installation of low NOx, low SOx burner at plants has reduced the greenhouse gases emissions to a considerable extent.</li><li>• Wastewater is subjected to effluent treatment plant comprises of oily water separators, equalization basins, slant rib coalescing units, dissolved air floatation units and secondary treatment unit (Activated sludge treatment) before exiting from the refinery. The wastewater complies with National Environmental Quality Standards (NEQS).</li><li>• Boiler blowdown water and Merox spent caustic is treated on plant before disposal.</li><li>• Kitchen wastewater is treated in a 50 gallons capacity treatment facility.</li><li>• Car wash water is recycled after treatment. Unit is indigenously developed with a capacity of 1 ton / day.</li><li>• Bioremediation is frequently used in refinery for the treatment of oily sludge. Oily sludge from crude oil tanks, furnace oil tanks, API separators, drain channels etc. is collected in pre-defined pits for this purpose having polythene lining. Cow dung is used to fasten the bioremediation process to convert the sludge into manure.</li><li>• Incineration of hazardous materials like oily rags etc.</li><li>• To promote use of renewable energy, ARL has Commissioned 110 kW on-grid Solar Power System at ARL general office in Morgah, Rawalpindi and a 3.6 kW at Morgah Biodiversity Park.</li><li>• To produce more environment friendly fuels, ARL is in the process of commissioning of diesel.</li><li>• Hydro Desulfurization (DHDS) and ISOM units which will reduce the Sulfur and Benzene contents in diesel and Premier Motor Gasoline respectively.</li><li>• Installation and commissioning of Amine Unit, Sour water stripper unit and Sulfur Recovery Unit</li></ul>		
Outcomes	<b>Measurement of (expected) outcomes and value added for our Company</b>		
	<ul style="list-style-type: none"><li>• Compliance to country legal requirements</li><li>• Stakeholder’s confidence</li><li>• Reuse of resource like water and slope oil</li><li>• Green image of ARL</li><li>• Reduction of environmental pollution</li><li>• Energy conservation</li></ul>		

PRINCIPLE 10		BUSINESS SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY	
Actions	Actions taken		
	Commitment:  We are committed to follow the highest standards of ethical and best business practices. We feel that running business in an ethical, transparent and legal manner is the only way forward. Bribes, kickbacks, and other illegal payments are not made on behalf of the Company in connection with all of its business activities.		
	System:  ARL management has identified corporate Vision, Mission, and Core Values which are a part and parcel of our way of doing business. All these statements have been endorsed by ARL Board of Directors and fully communicated to all stakeholders; our first and foremost core value is “Integrity & Ethics” which states that Integrity, honesty, high ethical, legal and safety standards are a cornerstone of our business practices.		
	In order to ensure the transparency, we have well elaborated systems for procurement & sale of any item and we strictly follow the directions of government authorities to do our business in a lawful manner.		
	An elaborative policy of Ethics & Business practices has been adopted and fully communicated to all stakeholders. We implement this policy in letter and spirit.		
Outcomes	Activities: <ul style="list-style-type: none"><li>• We regularly organize events/seminars to inculcate the importance of Ethical business practices in our employees at all levels. These events are also addressed by the Chief Executive Officer &amp; other senior management members of the company to give more comprehension to our employees regarding what is lawful and unlawful. Stern action is taken against incidents of corruption (if found) including termination from employment.</li><li>• The Policy of Ethics &amp; Business Practices is circulated to all management employees on yearly basis requiring them to sign it for reiterating their commitment to this very important document.</li><li>• Values &amp; Ethics committee has been formulated to investigate and advise appropriate action to the CEO regarding violations of ARL Core Values of any.</li></ul>		
	Measurement of (expected) outcomes and value added for our Company		
No case of corruption/dishonesty was reported in 2015-16 which has only become possible due to strict and transparent ARL’s systems and policies. Strict disciplinary action including termination of employment was taken if someone found guilty of corruption in the past as there is zero tolerance in ARL against corruption and malpractices.			
How do you intend to make this COP available to your stakeholders?			
ARL intends to make the Communication on Progress available and propagate through its website, annual report, company publications, company policies, press releases etc to its all stakeholders.			