

Commitment Statement by Chief Executive Officer:

August 25, 2017

H.E. António Guterres
Secretary General
United Nations
New York, NY 10017

Dear Sir,

I am pleased to confirm that Gulftainer Company Limited wishes to reaffirm its commitment to the Global Compact's ten principles in the areas of human rights, labour, environment and anti-corruption.

We commit to making the Global Compact and its principles part of the strategy, culture and day to day operations of our company and undertake to make a clear statement of this commitment to our employers, shareholders, partners, suppliers, customers and other stakeholders.

As founder members of the Pearl Initiative, we actively support public accountability and transparency within organisations.

I hereby submit our **Communication on Progress Report** that encompasses the following:

1. A description of practical actions taken/ planned in future to implement the Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
2. **Measurement of outcomes** – COP submission includes our intended metrics to measure the progress of the actions outlined in the section above (i.e., the degree to which targets/performance indicators were met/ will meet in the future, or other qualitative or quantitative measurement of results).

We are also pleased to confirm that Gulftainer's name may be mentioned as a signatory on the UN Global Compact's Call to Action website.

Sincerely yours,



Flemming Dalgaard

Chief Executive Officer

Gulftainer Global Compact Report for UN - Communication on Progress (COP)

Issue No.	Issue Area	Policy	Actions	Measureable Outcomes
1	Human Rights	Reference :- Pearl Initiative Middle East and British Safety Standards . Gulftainer's policies reflect its long standing commitment to human rights compliance	Following actions have been taken at Gulftainer's head office and terminal sites: <ul style="list-style-type: none"> • Strict safety standards are strongly enforced in our site locations and head office. • Fully dedicated team of safety experts work in tandem to ensure safety measures to our employees, customers and other stakeholders. 	<ul style="list-style-type: none"> • Not only are policies constantly reviewed and refreshed, but also strictly tracked and measured consistently. • We have also won several reputed safety awards such as ROSPA, International Safety Award, ISQEM Award to further attest our commitment
2	Labour	Reference :- UAE Labour Law	<ul style="list-style-type: none"> • Labour policies are strictly followed as per the rule of the country. • In addition to that, we also encourage an atmosphere of open dialogue and conversation between the management and employees. • Monthly events are organized to facilitate top-down and bottom-up communication within the hierarchies. 	<ul style="list-style-type: none"> • We are in the process of designing a measuring system to quantify employee's perception of comfort within the organization. • Additionally, also keeping track of employee expressions (Number of likes, posts etc.) via Yammer - our internal social media equivalent and encouraging open dialogues within the platform via various contests.
3	Environmental Stewardship	Reference:- Emirates Wildlife Society membership and Bee'A	<ul style="list-style-type: none"> • Gulftainer's CSR policy currently stands on the four pillars of 1) Environment 2) Employability 3) Health and Safety and 4) Ethical Corporate Governance • We have partnered with Emirates Wildlife Society to consistently update our corporate strategy on environmental compliance. • Additionally, we have also initiated a series of environmental friendly internal policies on water consumption, efficient power consumption, hazardous waste management and aim towards a paperless office. • In the future, with a proposed tie up with Emirates Wildlife Society, we intend to form a "Green team" comprised of environmentally aware and passionate people to enforce our commitment further • Planned tie ups with Bee'ah, the Middle East's fastest growing environmental management company. In Gulftainer facilities, we have already well managed and executed plans to recycle used water and re-use it for washing. 	<ul style="list-style-type: none"> • Perform environmental audits with the assistance of Emirates Wildlife Society. • Measure water and power usage in Head Office from utility bills. • Measure water and power usage in our site facilities with a proper waste management system, executed in tie up with Bee'ah. Measurable are tracked and presented by Bee'ah's via monthly reports. Reports include waste disposal measures, cost savings achieved from those measures, internal KPI's set and achieved. • Measure paper and print usage from IT's print management solutions software and from stationary stock tracking
4	Anti Corruption	Reference :- Pearl Initiative, UAE labour law and internal anti-corruption policy	Apart from the strongly emphasized national policy, we also have in place a strictly enforced internal anti-corruption policy from 2010. We have initiated internal compliance training courses to have assigned and certified compliance officers who plan to initiate internal trainings to raise employee awareness on anti-corruption. External consultants who are subject matter experts on compliance were brought in to raise awareness amongst top tier management.	<ul style="list-style-type: none"> • Monthly screening for any obvious cases of corruption • Setting strong precedents for repercussion on any occurrence of corruption in order to prevent any incidents in the future.

COP - ACTION PLAN					
Step No.	Step	Consideration			
		Actions		Responsible / Support People	Information /Preparation Required
		Deadline	Actions and future plans		
1	Period Covered by COP	30th August 2016 - 30th August 2017			
2	Statement of Continued support by CEO	25th August 2017	Prepare a draft and get it approved by CEO	Gulftainer Communications Team	Approval from CEO
3	Description of Actions				
	Human Rights	29th August 2017	Continue with the current policies and work towards more effective implementation	Gulftainer Communications Team, HR Team and QHSE team	Continue with this year's process. Follow up on actionable such as planned trainings, complaint box management and tracking measures on each category.
	Labour		Monthly reports to be generated by concerned departments to ensure open dialogue and a platform to raise concerns	Gulftainer HR Team	
	Environment		Continue with steps towards achieving a paperless office, reduction in water consumption, hazardous waste management and power usage reduction	Gulftainer Communications team, Green team, IT Team and QHSE team	
	Anti-Corruption		Introduce employee trainings to refresh anti-corruption policies. Plan the trainings every quarter. Register and track the success of the training. Install complaint boxes. Track, measure and record the types and frequency of complaints. Monitor continuously for improvement and aim towards zero complaints.	Legal Team and HR Team	
4	Measure Strategy for the above policies				
	Human Rights	Throughout the year until next submission	Register, track and record complaint frequency and type	Gulftainer Communications Team, HR Team and QHSE team	Compile data and revise/ enhance policies accordingly
	Labour		Register the number of meetings and discussions conducted to address employee concerns raised within the limitations of UAE Labour law with a strong aim to avoid any concerns in the future.	Gulftainer HR Team	Compile data and enforce strong adherence
	Environment		Measure water consumption and power usage from utility bills. Measure paper and print usage through Print Management Solutions.	Gulftainer IT Departments	Monthly tracking of pages printed across the group.
	Anti-Corruption		Measure and record employees attending refresher training and the installed complaint boxes. Enforcing maximum coverage of policies throughout the organization. Testing of employee awareness through surprise quizzes and rectifying knowledge gaps.	Gulftainer QHSE	Constant review of complaint boxes.
5	Prepare and present COP	30th August 2017	Collect and compile information into a single document	HR, QHSE, IT	Summary of all activities
			Communications department to brand it and design it	Communications	Measurement of outcomes
			Submit to CEO for review and approval	CEO	Statement of continued support by CEO
			Publish the approved document in the website	Communications	
			Submit COP at UNGC webpage	Communications	