


27.04.2018	Gupta Steel(Ship Breakers)	
	GLOBAL COMPACT ANNUAL COMMUNICATION ON PROGRESS	

A COP is a direct communication from business participants to their stakeholders. While the overall format is flexible, each COP must contain the following three elements:

- A **statement by the chief executive expressing continued support** for the Global Compact and renewing the participant's ongoing commitment to the initiative and its principles.
- A **description of practical actions** (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (and plans to take) to implement the Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
- A **measurement of outcomes** (i.e., the degree to which targets/performance indicators were met, or other, qualitative or quantitative, measurements of results).

Company Name	Gupta Steel (Ship Breakers)	Date	27.04.2018
Address	Gupta Steel (Ship Breakers) Plot No.39, SBY, Alang, Bhavnagar Gujarat, India-364081	Membership date	28.04.2017
Country	India	Number of employees	130
Contact name	Mr. Rubal Bansal		
Contact Position	Director	Sector	General Industries(Steel)
Contact telephone no.	+91 8018540082		

Brief description of nature of business

Gupta Steel (Ship Breakers) is one of the leading ship recyclers in the along ship recycling area since 1983. It has taken various initiatives in the area of worker welfare and social activities since the start of its operations. With an experience of more than 35 years in ship recycling, bansal group is now a diversified business group engaged in the field of ship recycling, manufacture of industrial oxygen, real estate and dealing in metal scrap, minerals, metals, machineries and machine tools.

Period covered by your Communication on Progress (COP)

From: 01.04.2017 To : 31.03.2018

Bansal Ship Breakers Pvt. Ltd. is a sustainable developed and committed to its end over has been awarded certifications from different esteemed organizations worldwide for its quality, health & safety, environment and green ship recycling in the competitive world of ship recycling. The company is awarded by Bureau veritas, RINA Class, EU SRR and ClassNK is under process. The company announces its communication on progress to its stakeholders in the following way.

Our Commitment or Policy

We at Gupta Steel(Ship Breakers). which is a ship recycling unit are committed to continual improvement of our quality, occupational health & safety and environment control processes aimed at prevention of all types of pollution and minimization of occupational health and safety risks. We shall strive to achieve this by:

- 1. Complying with applicable occupational health, safety and environment legislations.*
- 2. Striving to achieve the occupational health, safety and environment objectives and targets.*
- 3. Communicating this policy to all employees and make it available to interested parties and public.*

**1. STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER (OWNER OR PRESIDENT
IN THE CASE OF SMALL BUSINESSES)**

27.04.2018

To our stakeholders:

I am pleased to confirm that Bansal Ship Breakers Pvt. Ltd. reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily business practices and procedures. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Yours Sincerely

Rubal K bansal

Director

Ten principles

Human Rights

- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** Make sure that they are not complicit in human rights abuses.

Labour

- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** The elimination of all forms of forced and compulsory labour;
- **Principle 5:** The effective abolition of child labour; and
- **Principle 6:** The elimination of discrimination in respect of employment and occupation.

Environment

- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** Undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- **Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

2. DESCRIPTION OF ACTIONS

Human Rights

Human rights are rights inherent to all human beings, whatever our nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and individual

- i* A safety committee comprising of the members of management and workers will meet periodically and their recommendations will be considered.
- ii* The individuals must have to undergo a 15 days training program conducted by Gujarat Maritime Board before joining in this company.
- iii* "Safety, Health and Environment" will not be compromised while considering the targets of production.
- iv* It shall be the endeavor of the company to prepare and implement training programs for all level employees, based on safe working methods & procedures.
- v* Safety audit and risk assessment will be carried out by experts and compliance with their recommendations will be ensured.
- vi* Bansal Ship Breakers Pvt. Ltd. is an "equal opportunity employer." and will not discriminate and will take "affirmative action" measures to ensure against discrimination in different job activity of the company
- vii* We are committed in all areas to provide a work environment that is free from harassment. Harassment based upon an individual's disability, marital status, sex, race, color, religion ethnicity, national origin, age, religion or any other legally protected characteristics will not be tolerated
- viii* Ensuring environmentally sound recycling of ships
- ix* Ensuring proper standards of safety, throughout operations of the facility.
- x* Striving to improve our health, safety and environmental performance by achieving our objectives and targets.
- xi* As our products are pure virgin raw-materials. In the process of production the hazardous materials come out is treated in the following way which can not harm human life
 - Asbestos Containing Material (ACM) is removed and packed by competent agency as appointed by SRIA only. They should be wearing special suits designed for such operations having fitted with oxygen gas mask and an oxygen cylinder. Operations will be carried out in Denomination Unit with Negative Pressure Unit available with them.

Labour

- i* We are not engage in or support the use of child labour. We comply with local minimum age laws and requirements, and do not knowingly employ any person less than 18 years of age, in accordance with ILO C138 Article 2.
- ii* We comply with applicable laws and industry standards on working hours and public holidays. In addition, we comply with overtime compensation and bonus requirements.
- iii* We comply with minimum wage standards recommended by Government of Gujarat for skilled, semi skilled and unskilled labors.
- iv* It is companies policy to ensure that decisions concerning hiring, wages, promotion and training are based on unbiased criteria and are not linked to any of the discriminatory criteria
- v* The company has established a procedure accessible and known to all workers where workers can safely report incidents of workplace discriminatory.

Environment

- i* The company understands the environmental risks associated with ship recycling and is implementing the environmental requirements imposed by legal register regulations. The monitoring program is facility-specific, taking into account the plots and land-sea interface. Soil, water and air monitoring are applied for identification of features with regards to chemical, biological and physical changes in the environment surrounding the Ship recycling facility.
- ii* Periodically inspection and maintenance of equipment and machinery, tools and tackles gas monitoring in calibrated gas meter by competent person and production operation control process to avoid environmental damages is being ensured.
- iii* Ensuring regularly issuance of different work permits by competent person after inspection to the respective work area for safe and environmentally sound ship recycling.
- iv* Ensuring periodically testing of ambient analysis like Sea water, soil, noise and ambient air quality by authorized contractor DNV Engineers for pollution free work environment and sustainable social responsibility.
- v* Adopting emergency preparedness and rescue plan as well emergency team for rescue, firefighting, oil spill, first aid and disaster management to control accident and natural calamities.
- vi* After coming a project, it is being inspected by different government authority as well as non-government organizing body to make the project free from hazard and dangerous substances. After getting permission from them, the project undertakes to start at a predefined schedule.
- vii* The hazardous materials that come out from ship is being send to GEPIL for recycling ensuring to obtain proper manifest

- viii* Other HAZMATS is stored in hazardous storage area in temporary basis and sold to authorized third-party for recycling/reuse.

Anti-Corruption

As a signatory to the United Nations Global Compact, we are actively engaged with other companies and nongovernmental organizations in the fight against corruption.

- i* The nationality nature and global standard of our business adopted a policy for anti drug and anti corruption. This Policy focuses on a particular area of compliance, which the Company takes extremely seriously, anti-corruption for its stakeholders.
- ii* This Policy is designed to communicate the Company's commitment to counter corruption and to ensure that all employees and third-party representatives fully understand the scope and application of these Anti-corruption Laws. This Policy describes what is meant by corruption, how it affects our business, and what we are doing to fight it. In particular, it shows how our policies translate into practical processes and procedures, and explains what needs to be done to comply with them.
- iii* Failure by Company Personnel to comply with this Policy may expose the Company to substantial risk and could jeopardize its operations and reputation. You should also be aware that violations of certain Anti-corruption Laws may subject individual Company Personnel to both criminal penalties, including prison sentences, and civil liability.
- iv* The business is defined by the contracts it has with vendors, employees and its own customers. Beyond the explicit rights and obligations defined by the contract, the organization also has an implied covenant of good faith and fair dealing. This covenant is an ethical obligation that courts attempt to enforce. This standard obliges all contracting parties to not do anything that would make fulfilling the terms of the contract impossible. Examples of acting in good faith include granting the other party access to physical resources under the organization's control or providing timely information to complete a contracted task.
- v* It is ensured that companies internal procedure largely supports its anti corruption policy in the following way.
 - Commitment from senior management and a clearly articulated policy against corruption
 - Code of conduct and compliance policies and procedures
 - Oversight, autonomy and resources
 - Training and continual advice
 - Incentives and disciplinary measures
 - Third-party due diligence and payments
 - Confidential reporting and internal investigation
 - No Insider trading

3. MEASUREMENT OF OUTCOMES

Demographic factors are the external business environment that affects the business process and procedure. These factors are age, income, education, gender, ethnic group etc. As conceder to our business system which is influenced by age and gender.

- i* No worker is allowed under the age of 18 i.e. child labour.
- ii* There is no facility for women workers to work inside the company
- iii* As The Company is compiled by HKC, compared to last couple of years occupational diseases and injuries are minimized to 0.2 yearly in OSHA incident rate calculation table. The company's objective to reach zero incidents per year.
- iv* All the material that produces from ship are recyclable virgin materials. Materials are sold to third party and other companies to be a raw material to produce final products.