



COMMUNICATION ON PROGRESS



The UN Global Compact requires participating companies to produce an annual COP that details their work to embed the Ten Principles into their strategies and operations, as well as efforts to support societal priorities. The COP is a visible expression of your commitment to sustainability and your stakeholders can view it on your company's profile page. Companies that fail to report or to meet the criteria over time may be removed from the initiative.

2018-2019

Gupta Steel (Ship Breakers)

Plot No.39, SBY, Alang

Bhavnagar, Gujarat, India



1. Statement of Director



It is clear that the SDGs not only identify where we have to be in 2030 to create a sustainable world, they also outline new markets and opportunities for companies all over the world. The issues covered by the SDGs include poverty and inequality, education, health, gender equality, water, climate change, biodiversity, clean energy, decent work and economic growth, industry, innovation and infrastructure, responsible consumption and production, sustainable cities, peace, ethics and governance. The scope of the SDGs of UNGC is broad, and businesses will find suitable points in the agenda that they can connect with and contribute to face and deal with responsibilities.

To succeed our businesses, we should contribute to the SDG agenda in many ways. The products, services and resources we provide drive economic growth through investment, employment, anti-corruption, human rights and welfare and innovation through ethical business practices. We are striving to reduce our environmental footprints, strengthen relationships with stakeholders and create positive impact through our activities and supply chains.

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 operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

A handwritten signature in black ink, appearing to be 'A. Gupta', written over a horizontal line.

Director

Gupta Steel(Ship Breakers)

2. About the Company

Gupta Steel(Ship Breakers) is a premier recycling company situated in Alang, stretching over a total of 1.5 acres of land for its ship recycling activities at Alang Ship Recycling yard, Gujarat, India. It is blessed with high tidal range, long beach with gentle slope and firm ground beaching of ships just at the threshold of the plot. Gupta Steel(Ship Breakers) is established in 1983, recognized the importance of ship recycling. Gupta Steel was established by Mr. Kapoor Chand Bansal. With the Experience of More than 35 years of ship recycling, Gupta Steel is now a diversified business group engaged in the field of Ship recycling, Manufacturing of Industrial Oxygen Gas, Real Estate or dealing in scarp, minerals, metals, machineries and machine tools.

Bansal group is having all modern machines, tools and technologies required for fast and safe ship dismantling process. We possess the capacity to carry out recovery and recycling of ships covering all the size and classes including large commercial vessels– bulker and general cargo ships, container ships, oil and gas tankers and passenger ships such as cruise ships and ferries.

Gupta Steel is established in the year of 1983 and have dismantled 80 vessels about 758736.451 Metric Tons in Plot No- 39.

Policy-We are committed to continual improvement of human health, welfare, safety and environment, aimed at prevention of all types of pollution and minimization of environment, health and safety risks.

Mission-To establish us a leading Corporation in the field of our Business activities by establishing fair and trustworthy business relationship with our customer and employees.

Vision-To acts as a leader in our Business of Recycling of Ships and put the industry at new height by providing safety to the environment and people.

Certification

We are compliant with Norms and rules of **ISO** with Certificate of Quality Management ISO 9001: 2015, Certificate of Environmental Management System ISO 14001: 2015, Certificate of Occupational Health and Safety Management System ISO 45001: 2018, Certificate of Ship Recycling Management System ISO 30000: 2009

We have been awarded with the Statement of Compliance by **ClassNK & RINA Class** with the internationally acceptable standards i.e. the Hong Kong Convention (HKC-2009) & EU SRR for sustainable ship recycling.

Social Responsibility

Bansal group is committed to responsible for social responsibility for their internal and external stakeholders by :

1. Protecting environment by controlling all types of pollution at work place and surrounding areas.
2. Allocating and utilizing modern instruments and resources to increase productivity for social welfare of workers, employees and society at a large.
3. Committed to the development of community contributing funds directly to the charities, weaker section of the society and also different types of durable goods which is used in public places.
4. We improve livelihood and agricultural practices to the farming community in Mansa, where farmers are being supported with additional land resources for farming and agriculture practices.

Company Name	Gupta Steel(Ship Breakers)	Date	25.04.2019
Address	Gupta Steel(Ship Breakers) Plot No.25, SBY, Alang, Bhavnagar Gujarat, India-364081	Membership date	28.04.2017
Country	India	Number of employees	130
Contact name	Rubal Bansal		
Contact Position	Director	Sector	General Industries(Steel)
Contact telephone no.	+91 8128675279		

3. Our Policy

We at GUPTA STEEL(SHIP BREAKERS) which is a ship recycling unit are committed to continual improvement of our quality, occupational health & safety, human welfare and environment control processes aimed at development of human welfare, prevention of all types of environmental pollution and minimization of occupational health and safety risks. We shall strive to achieve this by:

- 1. Complying with integrated management system, applicable occupational health, safety, human welfare, and environment legislations.*
- 2. Striving to achieve the occupational health, safety, human welfare, and environment objectives and targets.*
- 3. Managing a quality management system meeting the requirements of ISO 9001.*
- 4. Communicating this policy to all employees and make it available to interested parties and public.*

4. Reporting on SDGs of UN Global Compact

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

- A **statement by the director 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).

5. Ten principles

A. 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.

B. 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.

C. 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.

D. Anti-Corruption

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

6. Alignment of ten principles with Gupta's Internal Policy structure

Entities	Principle	Policy
Human Rights	1: Businesses should support and respect the protection of internationally proclaimed human rights.	Policy statement on Human Rights
	2: Make sure that they are not complicit in human rights abuses.	Policy statement on Human Rights
Labour	3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Policy statement on Human Rights Social Accountability and Policy Statement
	4: The elimination of all forms of forced and compulsory labour.	Policy statement on Human Rights
	5: The effective abolition of child labour.	Social Accountability and Policy Statement Policy statement on Human Rights
	6: The elimination of discrimination in respect of employment and occupation.	Anti-Discrimination and Anti-Harassment Policy Policy statement on Human Rights
Environment	7: Businesses should support a precautionary approach to environmental challenges.	HSE Policy
	8: Undertake initiatives to promote greater environmental responsibility.	HSE Policy
	9: Encourage the development and diffusion of environmentally friendly technologies.	HSE Policy
Anti-corruption	10: Businesses should work against corruption in all its forms, including extortion and bribery.	Business Ethics And Anti-Corruption Policy

7. Communication on progress

A. Human Rights

Human rights are basic rights and freedoms for everyone based on our nationality, place of residence, sex, national or ethnic origin, color, religion, language, dignity, fairness, equality and respect or any other status. A company may affect people's human rights through its own activities or through its business relationships. We are committed to respect human rights as set out in our position on human rights, in line with the UN Guiding Principles on Business and Human Rights and Children's Rights and Business Principles.

- A standing order is formulated which regulates the service conditions of workmen and come in to force in accordance with the section 7 of the industrial employment act 1946.
- Works committee of employees & employers representative works effectively to deal with management regarding grievances, working condition, wages etc. within business.
- For timing and wellbeing of workforce, a well-constructed dormitory is provided near the company.
- We are ready to implement all the rules and regulations of SA 8000 shortly.
- A safety committee comprising of the members of management and workers will meet periodically and their recommendations will be considered.
- The individuals must have to undergo a 15 days training program conducted by Gujarat Maritime Board before joining in this company.
- "Safety, Health and Environment" will not be compromised while considering the targets of production.
- It shall be the endeavor of the company to prepare and implement training programs for all level employees, based on safe working methods & procedures.
- Safety audit and risk assessment will be carried out by experts and compliance with their recommendations will be ensured.

- Gupta Steel(Ship Breakers) 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
- The business is committed to update regularly its practices to incorporate revision to existing laws and regulations on human rights and labour standards. When practices are updated, managers and supervisors receive the appropriate training.
- 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
- Ensuring environmentally sound recycling of ships
- Ensuring proper standards of safety, throughout operations of the facility.
- Striving to improve our health, safety and environmental performance by achieving our objectives and targets.
- 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 cannot 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.

B. Labour

Labor is the amount of physical, mental, and social effort used to produce goods and services for an industry in any economy. It supplies the expertise, manpower, and service needed to turn raw materials into finished products and services. Against which laborers receive a wage to buy the goods and services they don't produce themselves. Those without desired skills or abilities often don't even get paid a living wage. We maintain a [minimum wage](#) structure to make sure their workers earn enough to cover the cost of living.

- Competitive salary and wages structure formulated by the company as per survey on household consumption of workforce and minimum wage rule by the local government.
- The company ensures that salary deductions are compliant ILO C95 Major with local law, if workers' salary can be deducted for disciplinary reasons or for not fulfilling performance targets. The company opts procedures include an appeal process for workers disagreeing with disciplinary actions, and choose to be represented by their union/association.
- We follow statutory and regulatory requirements on equal opportunity and discrimination employment as well complies its requirements.
- 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](#).
- We comply with applicable laws and industry standards on working hours and public holidays. In addition, we comply with overtime compensation and bonus requirements.
- We comply with minimum wage standards recommended by Government of Gujarat for skilled, semi-skilled and unskilled labors.
- 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
- The company has established a procedure accessible and known to all workers where workers can safely report incidents of workplace discriminatory.
- The company has a confidential reporting system for all workers to voice cases of discrimination that is transparent, time-bound and with a clear issue resolution process.
- We have been established a system to prohibit any form of harassment, physical, sexual or psychological, verbal abuse, punitive fines and deductions from salary and protection of workers privacy.
- We are an equal opportunity employer.

C. Environment

As a corporate goal of achieving carbon neutral status, it started to develop the organizational carbon footprints, so that necessary mitigation actions can be taken during further period. The objective of this study to put a first attempt to prepare the carbon footprint for company's organizational boundaries in India, the guideline and requirements of ISO 14064-1:2006 and WRI/WBCSD greenhouse gas protocol – a corporate accounting and reporting standard.

We announced an ambitious new target on climate action named carbon footprint, pledging that all our consumption and emission will be powered by offsetting out CO₂e emission so-called Scope1, 2 & 3 emissions, and plan to set targets for prioritized areas, such as raw materials input, business travel and cars heading carbon [footprint offsetting](#).

- Gupta Steel ensures that all wastes generated from recycling activity will be recyclable materials and equipment segregating them separate storage area inside the plot, labelled for clear identification and stored in appropriate conditions temporarily. The wastes generated are material specific and are directly or takes usual time to send sub-contractors. The SRF will avoid waste being mixed or contaminated in a way that interferes with subsequent handling, storage, treatment, recycling or disposal.
- The company ensures to have no contact with intertidal zone in ship recycling operation as it uses heavy duty crane to lift up cutting block directly from ship to impermeable floor of the yard.
- We are giving more priority to downstream waste management and debris management system daily basis which is generated from ship recycling process.
- 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.
- 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.

- Ensuring regularly issuance of different work permits by competent person after inspection to the respective work area for safe and environmentally sound ship recycling.
- 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.
- 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.
- 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.
- After receiving a project, the HazMats is identified and labelled by cherry waste management with HazMats experts of the company. Identification, handling and management of HazMats are carried out by experts with reference to the IHM report. The hazardous materials that come out from ship is being send to GEPIL for recycling ensuring to obtain proper manifest.
- Other HazMats is stored in hazardous storage area in temporary basis and sold to authorized third-party for recycling/reuse.

D. Anti-Corruption

Corruption is bad for society and bad for business, posing severe financial, operational and reputational risks. Now company takes action to implement serious and effective anti-corruption measures and policies within their strategies and operations to develop effective solutions that support a zero tolerance towards corruption.

As an active member to the United Nations Global Compact, we are vitally engaged with other companies and nongovernmental organizations in the fight against corruption.

- Bansal is developed a policy and committed on anti-corruption is a part of the company's culture and operations. Communicating this policy to employees, customers, suppliers and stakeholders that, company has a zero-tolerance policy on bribery & corruption

- 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.
- 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.
- 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.
- 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.
- We strengthened our business ethics mindset by continuing to focus on training and communication to our employees.
- It is ensured that company's 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
- We make accurate and complete entries in Company books, financial records and follow its accounting procedures and internal controls.

8. 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 consider to our business system which is influenced by age and gender.

- ✚ No worker is allowed under the age of 18 i.e. child labour.
- ✚ There is no facility for women workers to work inside the company
- ✚ No contact with intertidal zone as the company operates with heavy duty crane.
- ✚ Impermeable concrete floor of the entire yard to prevent pollution and safe work operation.
- ✚ Implication of standing order and works committee, for formally defined conditions of employment and to promote measures for securing and preserving amity and good relations between the employer and workmen.
- ✚ As The Company is compiled by HKC by ClassNK & RINA Class, compared to last years occupational diseases and injuries achieved by 50%, Consumption of basic raw materials like LPG and diesel is reduced to 13% and 4% respectively, in OSHA KPI process indicator analysis. The company's objective to reach zero incidents per year.
- ✚ All the material that produces from ship is recyclable virgin materials. Materials are sold to third party and other companies to be a raw material to produce final product.

--End of Report--