

# BANSAL SHIP RECYCLERS LLP

Plot No. 39, SRY, Alang, Bhavnagar,  
Gujarat-364081, India



## COMMUNICATION ON PROGRESS

*Challenging SDGs*

Bansal Ship Recycles LLP, has been a signatory of the UNGC since 2017 and is proud of the progress towards its 10 principles into their strategies and operations, as well as efforts to support societal priorities. Over the 2019-20 periods, we have continued our support for the UNGC and we will continue our support going forward

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## 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 Health, safety, environment, products, services and resources we provide drive economic growth through investment, employment, anti-corruption, human rights and welfare and innovation through socio-economic as well 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 stylized 'A' or similar character.

Director

## 2. Sustainability Governance

Sustainability is a broad discipline. When we hear the word “sustainability” we tend to think of renewable fuel sources, reducing carbon emissions, protecting environments and a way of keeping the delicate ecosystems of our planet in balance. In short, sustainability looks to protect our natural environment, human and ecological health, while driving innovation and not compromising our way of life. The views on sustainability seem to have a stronger focus on the present moment and on keeping things above a certain level. By its turn, sustainable development focuses more on a long-term vision. By adding the concept of sustainable development means not only that humankind should satisfy its current needs without compromising the ability of future generations doing the same. Along with it also comes an idea of socio-economic development and an increase in quality of life.

It is recognised at Bansal Group that being more sustainable is more successful. From innovations to scaling sustainable mining models to long-term environmental and community growth, our sustainability strategies are driven with the agenda of caring across the value chain. Our strategy for value-chain sustainability draws insights from our interactions with varied stakeholders and partners. Sustainability is vital to steer operational excellence and ensure business growth. Hence, we have rooted sustainability as a strategic tool in our key business strategies to ensure ourselves sustained and competitive world of ship recycling. We adhere to Sustainable Development Framework that helps us integrate sustainability throughout our integrated management process and operational drivers of governance, safety, and social responsibility. Our policies, procedures, and best practices are all aligned to this strategy, which is why our employees have a clear understanding of their role in driving business success. With this approach, we predict a sustainable future of our business operations by meeting our growth targets and creating long-term value for all our stakeholders.

Our approach to sustainability consists of our fundamental values and Code of Conduct. It is lined up with the UNGC and its principles. Our Code of Conduct and sustainability policies apply to our workforce across all of our operations. This Communication on Progress in 2019-2020 demonstrates our continuing progress on integrating the UNGC and its principles into everything we do. It reflects our 2019-2020 Annual and Sustainability Reports and Climate change responses.

### 3. About the Company

Bansal Ship Recyclers LLP is a premier recycling company situated in Alang, stretching over a total of 2 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. Bansal Ship Recyclers established in 1983, recognized the importance of ship recycling. Bansal Ship Recyclers was established by Mr. Kapoor Chand Bansal. With the Experience of More than 35 years of ship recycling, Bansal Ship Recyclers 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.

**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.

**Infrastructure and Capacity-** Bansal Ship Recyclers LLP established in the year of 1983 and have dismantled 83 nos. of vessels about 765688.925 Metric Tons in Plot No- 39 at Alang Ship recycling yard, Bhavnagar in the state of Gujarat, India.

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<b>Company Name</b>	Bansal Ship Recyclers LLP	<b>Reporting Date</b>	18.04.2020
<b>Address</b>	Bansal Ship Recyclers LLP Plot No.39, SRY, Alang, Bhavnagar Gujarat, India-364081	<b>Membership date</b>	28.04.2017
<b>Country</b>	India	<b>Number of employees</b>	130
<b>Contact name</b>	Rubal Bansal		
<b>Contact Position</b>	Director	<b>Sector</b>	General Industries(Steel)
<b>Contact telephone no.</b>	+91 8128675279		
<b>Website /Mail</b>	<a href="http://www.bansalgroupindia.com">www.bansalgroupindia.com</a> hkc@bansalgroupindia.com		

## 4. 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) for sustainable ship recycling.

## 5. Membership

1. Bansal Ship Recyclers LLP is member to the Gujarat environmental protection and infrastructure limited (GEPIL), which operates and maintains common hazardous wastes on behalf of Gujarat maritime board (GMB) since 2005.
2. Member of National safety council (NSC), to meet the emerging challenges in the HSE aspects due to continuous advancement in technology.
3. Member of United Nations Global Compact challenging to SDGs & committed to conduct business in an ethical, legal and social responsibility manner.
4. Bansal Ship Recyclers LLP is key signatory and participant in climate neutral now taking the initiatives on reducing emissions, offsetting with global carbon offset projects and initiatives for sustainable renewable energy.



## 6. Green Renewable Energy

Renewable energy is collected from natural resources which are naturally replenished in contrast with fossil fuels. Renewable energy, often referred to as clean energy, comes from natural sources or processes that are constantly replenished. Now that we have increasingly innovative to capture and retain solar energy, renewables are becoming a more important power source, accounting for our plant operations. The environment is under threat. The amount of carbon dioxide in the atmosphere is growing and if we are serious about avoiding the worst of climate change, it is incredibly important that we rapidly reduce carbon emissions. Solar panels are ideal resources for this carbon emissions and global warming.

We have taken another step towards green initiatives by installation of installed 20 KW based solar energy system to combat our power source is being utilized in our facility in the year 2019. This means it is produced with little-to-no environmental impact and does not dispense greenhouse gases indirectly into the air that contribute to global warming.



## 7. Greenbelt Development

Greenbelt land refers to an area that is kept in reserve for an open space, most often around larger cities. The main purpose of the green belt policy is to protect the land around larger urban centers from urban sprawl, and maintain the designated area for forestry and agriculture. Increased vegetation in the form of greenbelt is one of the preferred methods to mitigate air and noise pollution. Plants serve as a sink for pollutants, act as a barrier to break the wind speed as well as allow the dust and other particulates to settle on the leaves. It also helps to reduce the noise level to a large extent.

We improve livelihood and maintain the designated area for forestry and agriculture in Mansa, where farmers are being supported with additional land resources for farming and agriculture practices.

Our green belt practices covers vegetation and forestry which provides beneficial in many ways leading to soil conservation, biodiversity conservation, monitoring ecological health, maintaining greenery, recharge of ground water and maintaining pleasant micro climate of the region. In addition vegetation can also absorb pollutants from the environment and helps in effective pollution control.

We have proposed in an area of 50,000 square meter land an urban sprawl even-handed 15 kilometers from Bhavnagar and 30 kilometers from our plant operation at Alang. Adequate attention has been paid to plantation of trees, their maintenance and protection based on the geology, soil condition and topography of the site area. A wide range of plant species is planted in and around the premises.

### Some clips of Initiatives:









## 8. Social Responsibility

Bansal Ship Recyclers LLP 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 Mamsa, where farmers are being supported with additional land resources for farming and agriculture practices.



## 9. Covid19 the Pandemic

**Good health and well being:** We have been conducted an awareness campaign for our workers to control the spread of covid19 and for their good health and well being as following manner.

Human coronaviruses cause infections of the nose, throat and lungs. They are most commonly spread from an infected person through respiratory droplets generated when you cough or sneeze close, prolonged personal contact, such as touching or shaking hands touching something with the virus on it, then touching your mouth, nose or eyes before washing your hands.

In an effort to prevent the spread of COVID-19 within communities and across the country, all workers are advised to:

- Stay at home unless you have to go to work
- Avoid all non-essential trips in your community
- Do not gather in groups
- Limit contact with people at higher risk, such as older adults and those in poor health
- Do exercise to increase your immunity
- Always keep a distance of at least 2 arms lengths (approximately 2 meters) from others. If you go out for a walk, do not congregate and always practice physical (social) distancing by keeping at least 2 meters apart from others at all times.
- Use of mask when you are outing.

**Hygiene:** Proper hygiene can help reduce the risk of infection or spreading infection to others.

- Wash your hands often with soap/sanitizer and water for at least 20 seconds.
- Cough or sneeze into a tissue or the bend of your arm, not your hand.
- Dispose of the tissue as soon as possible in a waste basket and wash your hands immediately.
- Avoid touching your eyes, nose, or mouth with unwashed hands.





**Zero Hunger:** The Coronavirus (COVID-19) pandemic is disrupting the world. Nationwide lockdown for the outbreak is a heavy toll on the socio and economic factors of human lives. Its rapid global spread is threatening to affect millions of people already made vulnerable by food scarcity, lack of proper nutrition and the effects of disasters.

To minimize this impact:

- We took a step forward to distribute grocery to our beloved workers.
- Distribute food among the needy during a nationwide lockdown in the wake of coronavirus outbreak, at a relief camp in Bhavnagar, Gujarat.
- Donate to prime minister care fund to fight against covid19





## 10.Sustainable Livelihood

The sustainable livelihoods approach improves understanding of the livelihoods of the poor. It organizes the factors that constrain or enhance livelihood opportunities, and shows how they relate. It can help plan development activities and assess the contribution that existing activities have made to sustaining livelihoods.

We have adopted an approach of sustainable farming for poor peoples near Mamsa an urban sprawl to witness some of their unstable social and economic factors. This helps attain production resilience and diversification of livelihoods in order that rural households can cope with production and market risks.



## 11. Carbon footprint & offsetting

As a corporate goal of achieving carbon neutral status, we started to develop the organizational carbon footprints, so that necessary mitigation actions can be taken during further period.

This carbon footprint report has been prepared in full accordance with the greenhouse gas protocol (GHG), the most widely used international carbon calculation methodology, compatible with other GHG standards such as the ISO 14064-1, which also allows for direct integration with national and international greenhouse gas (GHG) registries.

The emitting activities includes direct emissions resulting from Bansal Ship Recyclers LLP owned or controlled equipment and emissions from purchased electricity (Scope 1 and 2 emissions respectively); and indirect emissions scope 3 resulting from Bansal Ship Recyclers LLP are neglected. It is important to highlight that under the GHG protocol, the reporting of both direct emissions and indirect emissions, resulting from purchased electricity, are compulsory. As many voluntary emissions as possible, all other indirect emissions, scope 3 emissions, are reported on a voluntary basis dependent on reliable data.



**United Nations**  
Framework Convention on  
Climate Change

Date: 29 May 2019  
Reference: VC/0155/2019

# VOLUNTARY CANCELLATION CERTIFICATE

### Presented to:

CDM Project 9973: Biomass based power plant in Mahendargarh, Haryana

### Reason for cancellation:

I am offsetting green house gas emissions for my company



### Number and type of units cancelled

Start serial number: IN-5-226040724-2-2-0-9973  
End serial number: IN-5-226041058-2-2-0-9973

### 335 CERs

Equivalent to 335 tonne(s) of CO<sub>2</sub>

The certificate is issued in accordance with the procedure for voluntary cancellation in the CDM Registry. The reason for cancellation included in this certificate is provided by the canceller.

## 12. Environmental monitoring

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 facility.

Environmental monitoring is performed and these monitoring reports are maintained and archived by the HSE Department in a separate folder. In case any negative changes are identified specialists will be contracted for identification of the causes, evaluation of risks and development of counter measures.

The facility takes any precaution to control all activities and to prevent contamination of soil, air, water, including intertidal area. The following measures are taken for minimizing potential contamination and other adverse effects:

Prevention of oil contamination:

- Minimizing oil volumes prior to landing
- Removal of all oils from ships as early as possible
- Avoiding contamination of intertidal zone and soil by appropriate cutting and preparation of places where blocks or materials may / will fall (coverage of permeable floors like sand or soil)
- Being prepared for oil decontamination in water / sea

Environmental monitoring means monitoring program of any potential impact on the environment during normal operation and unexpected events.

During facility operation- frequent sampling of air, water, soil, handling of waste disposal including related data as well as environmental incidents and related actions for correction and improvement is being conducted. Monitoring or analyses reports or other documentation is archived. Monitoring and archiving are supervised by HSE department, including collecting of data or results provided by external service suppliers.

### **Environmental Quality**

The success of environmental control measure can only be understood by proper monitoring of the environmental parameters. A detailed monitoring for different environmental parameters will be carried out as per direction of Gujarat Pollution Control Board. Monitoring methodologies will follow standard methods prescribed by Central Pollution Control Board (CPCB) & Bureau of Indian Standards (BIS). Major monitoring parameters are discussed below. The environmental audit & monitoring program is conducted by third party agency concerning to relevant parameters. All monitoring reports will be submitted to Gujarat Pollution Control Board.

### **Soil monitoring**

During ship recycling processes, potential contamination of soil may be presumed due to waste generated during the process.

- Debris is collected day to day basis from intertidal zone and send to GEPIL for recycling.
- Ship recycling is the sources of many toxic substances such as paints, chemicals, solvents wood, preservatives, pesticides, adhesives and sealants. Hazardous waste generated during construction phase shall be stored in sealed containers and disposed off as per the Hazardous Wastes (Management, Handling & Transboundary Movement) Rules, 2008.

Therefore soil samples are taken at periodic schedule or immediately after environmental incidents especially from intertidal zone, on demand also from second or third cutting zones. Samples are analyzed regarding concentrations of heavy metals. Results of soil samples are kept on file in the HSE Department.

The sampling and analysis methodologies of the soil samples will be as per CGE/SOP/1.

### **Water monitoring**

The monitoring of water quality is done on periodic schedule basis. Water is tested regarding heavy metals, water hardness, water salinity, PCBs, Oil and other chemicals. The analysis results for the waters surrounding the SRF are checked and countermeasures planned in case of high levels of contamination or increasing contamination levels. More parameters or locations may be included for monitoring if directed by Gujarat Pollution Control Board. The sampling and analysis methodologies of the water samples will be as per IS-3025, APHA 23rd Ed etc. The new reports are kept on file in the HSE Department.

### **Air monitoring**

Ambient air quality will be monitored within the plant and in the vicinity as directed by Orissa Pollution Control Board. The parameters will include SPM, RPM, SO<sub>2</sub> and NO<sub>2</sub>. The report will be submitted to Gujarat Pollution Control Board. The sampling and analysis of air pollutants will be done as per the norms suggested by Central Pollution Control Board (Emission Regulations Part-III) and also the Bureau of Indian Standards IS-5182.

The monitoring of air borne asbestos fibers is done by an air sampler circulating in the Alang area. Measures of dioxins occurring from torch cutting of HM or PCB containing materials is relevant for air monitoring. The results of contamination of the company and surrounding areas are checked and countermeasures planned in case of high levels of contamination or increasing decontamination levels are detected. The Analysis report for air monitoring is kept on file in the HSE Department.

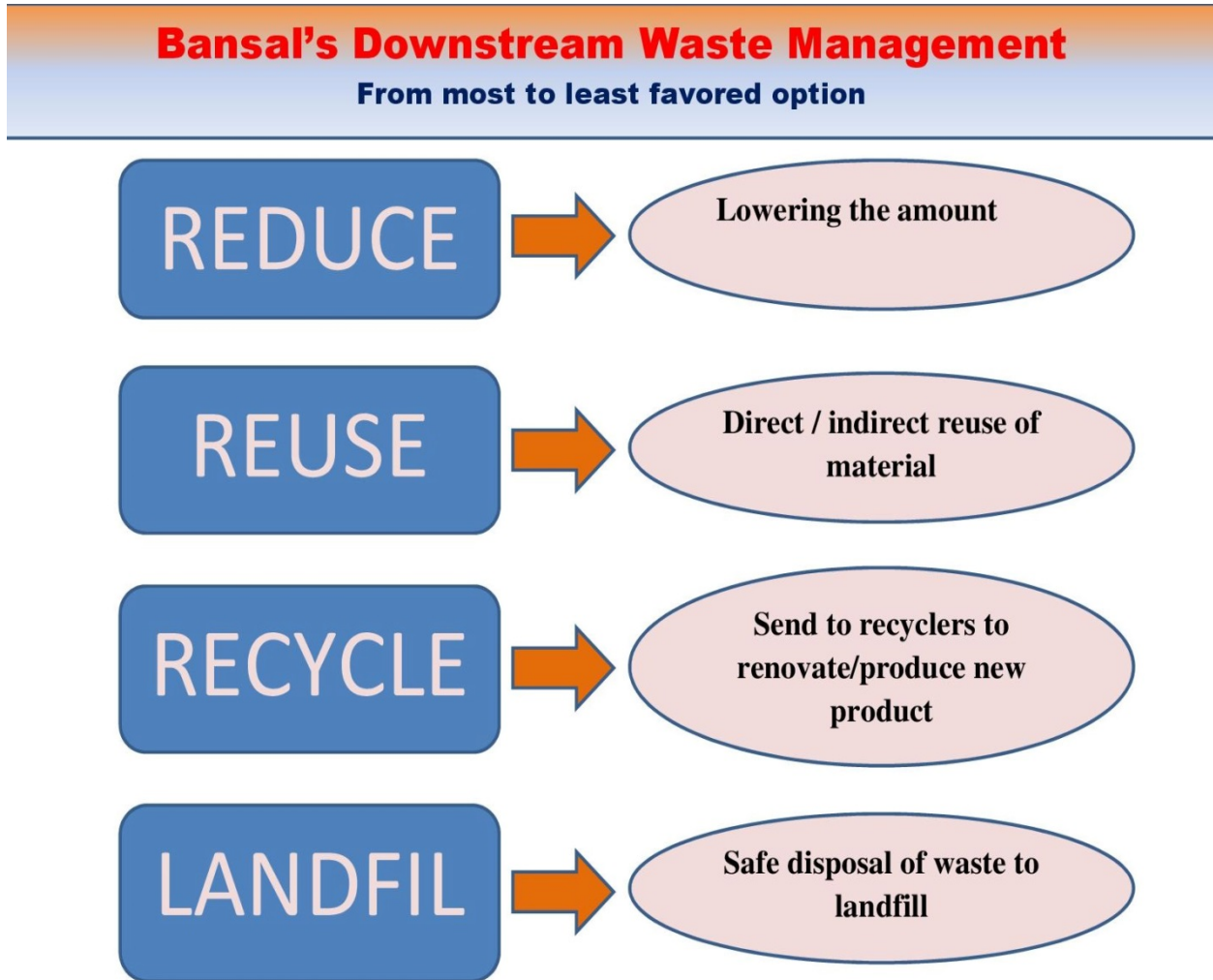
### **Noise monitoring**

The monitoring of noise emissions occurring from ship recycling activities is carried out on periodic basis during working hours. The results are evaluated by third party with the support of HSE Manager and if found to be necessary, countermeasures planned. The noise monitoring report is kept on file in the HSE Department.

### 13. Downstream Waste management

Waste materials fall into four categories for management, which include:

- + Reducing;
- + Re-using;
- + Recycling;
- + Landfill;



#### Reduce

Waste reduction is a set of processes and practices intended to reduce the amount of waste produced in ship recycling process. By reducing or eliminating the generation of harmful and persistent wastes, waste reduction supports efforts to promote a more sustainable environment, society and friendly ecosystem.

We work to reduce the volume and toxicity of our waste by:

- Isolate those parts of the ship which are harmful and dangerous to both marine and human lives.
- Conserve marine ecosystem by proper discarding of ship breaking waste.
- Reusing those parts of the ship that are important and can be re-used successfully while making new ships, thus saving resources.
- Help the company benefit from the process by optimum utility of the ship's parts.
- Acquiring only what we need when we need it.
- Working with suppliers/service providers to reduce packaging.
- Treating waste on board to minimize volume by stacking, shredding, crushing and incinerating.

### **Re-use**

If surplus materials can be used in future operations they are classified as materials which can be re-used. The surplus products will be labelled and storage area recorded for future reference. We seek new opportunities to reuse materials and equipment on board or find others who can use things that are in good condition and we no longer need. This extends the use of many items as:

Our ships donate tons of usable items, including mattresses and clothing, store items, electronics items, furniture, rescue items, PPE items, tools & tackles and machinery. We receive certain supplies in plastic and metal drums, which we reuse as waste receptacles, thereby avoiding the need to purchase waste containers.

### **Recycle**

If surplus materials cannot be reused in their present form but could be used in a different form, they will be sent to recycling or labelled as future recycling. We strive to recycle as many items as possible. We place recycling collection containers throughout the ship so our supervisors, masters and Mukadam with certain labors can segregate the various recycling materials. We send the collected materials for recycling to various authorized recyclers, including plastic, rubber, glass, paper, cardboard, wire rope, machinery, aluminum, electronic equipment, toner cartridges, batteries, fluorescent lamps, silver, scrap metal, oily waste and used cooking oil etc.

### **Landfill**

If the above options cannot be satisfied then the only alternative way is to send the surplus materials to GPCB authorized landfill.

## 14. Our Policy

*We at BANSAL SHIP RECYCLERS LLP 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.*

## 15. 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).

## 16. Four(4) domain, Ten (10) principles and seventeen (17) SDGs

### Four Domains

- A. Human Rights
- B. Labour
- C. Environment
- D. Anti-Corruption

### 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.



The above ten principles are part of our business ethics and practices in our workplace. We strive to propagate these principles within our stakeholders i.e. vendors, supply chain, customers and workforce at large.

## **Seventeen SDGs**

The Sustainable Development Goals (SDGs) are a collection of 17 global goals set by the United Nations General Assembly in 2015 for the year 2030. The SDGs are part of Resolution 70/1 of the United Nations General Assembly, the 2030 Agenda.

The 17 sustainable development goals (SDGs) to transform our world:

GOAL 1: No Poverty

GOAL 2: Zero Hunger

GOAL 3: Good Health and Well-being

GOAL 4: Quality Education

GOAL 5: Gender Equality

GOAL 6: Clean Water and Sanitation

GOAL 7: Affordable and Clean Energy

GOAL 8: Decent Work and Economic Growth

GOAL 9: Industry, Innovation and Infrastructure

GOAL 10: Reduced Inequality

GOAL 11: Sustainable Cities and Communities

GOAL 12: Responsible Consumption and Production

GOAL 13: Climate Action

GOAL 14: Life below Water

GOAL 15: Life on Land

GOAL 16: Peace and Justice Strong Institutions

GOAL 17: Partnerships to achieve the Goal

## 17. Alignment of ten principles with Bansal's Internal Policy structure

Entities	Principle	Policy
<b>Human Rights</b>	1: Businesses should support and respect the protection of internationally proclaimed human rights.	Policy statement on Labour & Human Rights
	2: Make sure that they are not complicit in human rights abuses.	Policy statement on Labour & Human Rights
<b>Labour</b>	3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Policy statement on Labour & Human Rights Social Accountability and Policy Statement
	4: The elimination of all forms of forced and compulsory labour.	Policy statement on Labour & Human Rights
	5: The effective abolition of child labour.	Social Accountability and Policy Statement Policy statement on Labour & Human Rights
	6: The elimination of discrimination in respect of employment and occupation.	Anti-Discrimination and Anti-Harassment Policy Policy statement on Labour & Human Rights
<b>Environment</b>	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
<b>Anti-corruption</b>	10: Businesses should work against corruption in all its forms, including extortion and bribery.	Business Ethics And Anti-Corruption Policy

## 18. 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 commitment 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 grivences, working condition, wages etc. with in business.
- For timing and welbeing of workforce, a well constructed dermitory is provided near the company.
- We are gradually implementing all the rules and regulations of SA 8000.
- 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.

- Bansal Ship Recyclers LLP 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 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.

### *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

- Competative 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 equql opportunity and discrimination employment as well complies its requirements.

### **Child Labour**

- 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](#).
- If unknowingly any child labour is employed below the age of 15 years and found after strict verification of his age proof testimonials, he is allowed to carry out light work as well as provide schooling.
- The acceptable minimum age for employees is 15 years. Employees under the age of 18 years are not to be involved in night work or work that is hazardous or likely to have a negative impact on the employee's physical or mental development.

### **Voluntary labour**

- The company shall only employ workers that freely choose their employment
- Overtime is not a constraint and shall always be voluntary.
- The business has the right to eliminate all forms of forced, bounded, prison labour or subcontracted prison labour and compulsory labour.
- Workers can freely leave their employment after giving reasonable notice.

- Workers must be allowed to move around freely and leave their place of work when their prescribed time ends.

### **Young Workers**

- The minimum age of worker to work by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years.
- If young workers are employed, they are the age between 15 to 18 years, they shall never work overtime and shall have a reduced work schedule.
- Young workers shall never work at night.
- Young workers shall never be engaged in hazardous work or work that could harm their physical, mental or moral development.
- 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 have 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 harrashment, 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 CO<sub>2</sub>e 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](#).

- Bansal Ship Recyclers 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.
- Environmental monitoring is our prime moto. During facility operation- frequent sampling of air, water, soil, handling of waste disposal including related data as well as environmental incidents and related actions for correction and improvement is being conducted.
- Ship recycling constitutes a waste management process, handling starts with the separation of elements from the ship. All hazardous materials as well as wastes generated during the ship recycling process are handled, separated, transported and stored only in safe containers / containments and / or on impermeable floors with effective drainage systems.
- We have installed 27 KW based solar energy system to combat our power source is being utilized in our facility. This means it is produced with little-to-no environmental impact and does not dispense greenhouse gases indirectly into the air that contribute to global warming.



## *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.

## 19.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. If found he is allowed to carry out light work as well as provide schooling.
- ✚ 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.
- ✚ Impemeable concrete floor of all the yard to prevent polution and safe work operation.
- ✚ Implemation of standing order and works comeetee, 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 43%, Consumption of basic raw

materials like LPG and diesel is reduced to 11% and 3.5% respectively, in OSHA KPI process indicator analysis. The company's objective to reach zero incidents per year.

- ✚ 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 product.
- ✚ We have installed 27 KW based solar energy system to combat our power source is being utilized in our facility.

## 20. Health, safety, environmental and social strategy for 2020

As Human, environmental, social and economic factors are four pillars of sustainability:

- Gradually minimization of environmental pollution and climatic action is our motto.
- Improvement of socio-economic factors of labour and surrounding community.
- Bansal Ship Recyclers is committed to continuously improving the working environment.
- Bansal Ship Recyclers 2020 ambitions are in place for the three strategic focus areas in workplace: health, safety, ergonomics and well-being.
- Bansal Ship Recyclers embraces a zero-injury mind-set and will not accept people being injured as a result of our working conditions.
- Bansal Ship Recyclers is committed to a sustainable health and safety strategy and falling trends in injury frequency rate with absence towards 2020.
- Good workplace ergonomics is a key element in ensuring long-term health for employees.
- Bansal Ship Recyclers is committed to reducing work-related muscular/skeletal pain experienced by employees.
- Bansal Ship Recyclers wants to take on broader responsibility for our people's well-being and thereby develop a systematic approach to supporting sustainable business performance and the healthy growth of the company.
- Bansal Ship Recyclers strives to enable people to live longer, healthier and more productive lives.
- Bansal Ship Recyclers is committed to improving mental well-being and reducing the level of stress symptoms among our employees.

## 21. Our Commitment

Incorporating sustainability into our integrated business system is our prime motto. But it is equally important to communicate our commitment internally among our team, and externally to business partners, suppliers, customers and other stakeholders.