

# COP SUBMISSION 2021

UN Global Compact Communication on Progress Vee Gee Industrial Enterprises Pvt.Ltd. - Advanced level reporting Vee Gee Industrial Enterprises Pvt.Ltd. has been a member of the UN Global Compact (UNGC) since 12<sup>th</sup> September 2012 and is committed to aligning its business, operations and impacts on society with the UNGC's ten principles of business conduct that relate to environmental and labor practices, protection of human rights and anti-corruption work.

This integrated plan and report also strives to establish connections between these activities and Vee Gee Industrial Enterprises Pvt.Ltd.'s performance towards its goals, which exhibit the strength of Vee Gee Industrial Enterprises Pvt.Ltd.'s commitment to sustainable, profitable development.

Every year, Vee Gee Industrial Enterprises Pvt.Ltd. reports to the UNGC on its priorities, progress and best practices regarding this commitment in the Annual report.

This 2021 Communication on Progress (COP) reflects the UNGC's Advanced level reporting guidelines and indicates how Vee Gee Industrial Enterprises Pvt.Ltd. meets or plans to meet the 21 advanced criteria and the question on Business and Peace, in the following areas:

- Verification and transparency
- Strategy, governance and engagement
- UN goals and issues
- Implementation of Global Compact principles
- Business and Peace Introduction Vee Gee Industrial Enterprises Pvt.Ltd. does not produce a stand-alone COP, instead the COP is part of the 2020 plan and annual report and the managing director's endorsement of the UNGC can be found .

The analysis of high-risk and/or conflict areas is covered in the section on Risks, risk management and opportunities in the report, in Society and in a dedicated ESG Note in Annual report.

The COP includes qualitative and quantitative measurements of outcomes illustrating the degree to which targets/performance indicators were met in the Annual report.

The COP is shared on the UNGC website and on the Vee Gee Industrial Enterprises Pvt.Ltd. notice board, available to all stakeholders.

The printed report is also distributed to all shareholders and investors as well as other stakeholders who actively request a copy. The COP has been audited and the sustainability information has been subject to limited assurance in the Annual report. It applies the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines and qualifies to the level B+.

The index below lists the 21 criteria required by the guidelines and directs readers to where Vee Gee Industrial Enterprises Pvt.Ltd. addresses them in the Annual report with sustainability information and display at main notice board. In its self-assessment of its COP, Vee Gee Industrial Enterprises Pvt.Ltd. reports on at least one of each of the relevant topics addressed in the 21 criteria.

Strategy, Governance and Engagement advanced level criteria Topics addressed in Vee Gee Industrial Enterprises Pvt.Ltd.

Advanced level criteria	Topics addressed in Vee Gee Industrial Enterprises Pvt.Ltd.'s reporting	Related references in Vee Gee Industrial Enterprises Pvt.Ltd. reporting
Criterion 1: The COP describes mainstreaming into corporate functions and business units	1.Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc.) ensuring no function conflicts with company sustainability commitments and objectives.  2. Align and integrate strategies, goals, and incentive structures of all business units and subsidiaries with corporate sustainability strategy. 3. Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary. 4. Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs.  5. Ensure that different corporate functions coordinate closely to maximize performance and avoid negative impacts	Main notice board and distributed to all its stake holders.
Criterion 2: The COP describes value chain implementation.	1. Analyse each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts.  2. Communicate policies and expectations to suppliers and other relevant business partners.	Main notice board and distributed to all its stake holders.

	<p>3. Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence.</p> <p>4. Undertake awareness-raising, training and other types of capacity building with supplier and other business partners.</p>	
Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights	<p>1. Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates.</p> <p>2. Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company.</p> <p>3. Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services.</p> <p>4. Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties.</p>	Main notice board and distributed to all its stake holders.
Criterion 4: The COP describes effective management systems to integrate the human rights principles	<p>1. Process to ensure that internationally recognized human rights are respected.</p> <p>2. On-going due diligence process that includes an assessment of actual and potential human rights impacts</p> <p>3. Internal awareness-raising and training on human rights for management and employees.</p> <p>4. Operational-level grievance mechanisms for those potentially impacted by the company's activities.</p> <p>5. Allocation of responsibilities and accountability for addressing human rights impacts.</p> <p>6. Internal decision-making, budget and oversight for effective responses to human rights impacts.</p> <p>7. Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to.</p> <p>8. Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and /or other forms of collective action.</p>	Main notice board and distributed to all its stake holders.
Criterion 5: The COP describes effective monitoring and	<p>1. System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain.</p>	Main notice board and distributed to all its stake holders.

evaluation mechanisms of human rights integration	<p>2. Monitoring drawn from internal and external feedback, including affected stakeholders.</p> <p>3. Leadership review of monitoring and improvement results.</p> <p>4. Process to deal with incidents the company has caused or contributed to for internal and external stakeholders.</p> <p>5. Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue.</p> <p>6. Outcomes of integration of the rights principles.</p>	
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<b>Robust Labor Management Policies &amp; Procedures</b>		
Criterion 6: The COP describes robust commitments, strategies or policies in the area of labor	<p>1. Reference to principles of relevant international labor standards (ILO conventions) and other normative international instruments in company policies.</p> <p>2. Reflection on the relevance of the labor principles for the company.</p> <p>3. Written company policy to obey national labor law, respect principles of the relevant international labor standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).</p> <p>4. Inclusion of reference to the principles contained in the relevant international labor standards in contracts with suppliers and other relevant business partners.</p> <p>5. Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation.</p> <p>6. Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labor standards in the countries of operation, possibly in a tripartite approach (business-trade uniongovernment).</p> <p>7. Structural engagement with a global union, possibly via a Global Framework Agreement</p>	Main notice board and distributed to all its stake holders.

Criterion 7: The COP describes effective management systems to integrate the labor principles	<ol style="list-style-type: none"> <li>1. Risk and impact assessments in the area of labor.</li> <li>2. Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labor standards.</li> <li>3. Allocation of responsibilities and accountability within the organization.</li> <li>4. Internal awareness-raising and training on the labor principles for management and employees.</li> <li>5. Active engagement with suppliers to address labor-related challenges.</li> <li>6. Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice</li> </ol>	Main notice board and distributed to all its stake holders.
Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labor principles integration	<ol style="list-style-type: none"> <li>1. System to track and measure performance based on standardized performance metrics.</li> <li>2. Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future.</li> <li>3. Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labor standards.</li> <li>4. Process to positively engage with the suppliers to address challenges (i.e. partnership approach instead of corrective approach) through schemes to improve workplace practices.</li> <li>5. Outcomes of integration of the Labor principles.</li> </ol>	Main notice board and distributed to all its stake holders.

Robust Environmental Management Policies and Procedures		
Criterion 9: The COP describes robust commitments, strategies or policies in the area of	<ol style="list-style-type: none"> <li>1. Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development).</li> <li>2. Reflection on the relevance of environmental stewardship for the company.</li> <li>3. Written company policy on environmental stewardship.</li> </ol>	Main notice board and distributed to all its stake holders.

environmental stewardship	<p>4. Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners.</p> <p>5. Specific commitments and goals for specified years.</p>	
Criterion 10: The COP describes effective management systems to integrate the environmental principles	<p>1. Environmental risk and impact assessments.</p> <p>2. Assessments of lifecycle impact of products, ensuring environmentally sound end-of-life management policies.</p> <p>3. Allocation of responsibilities and accountability within the organization.</p> <p>4. Internal awareness-raising and training on environmental stewardship for management and employees.</p> <p>5. Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts.</p>	
Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship	<p>1. System to track and measure performance based on standardized performance metrics.</p> <p>2. Leadership review of monitoring and improvement results.</p> <p>3. Process to deal with incidents.</p> <p>4. Audits or other steps to monitor and improve the environmental performance of companies in the supply chain.</p> <p>5. Outcomes of integration of the environmental principles.</p>	Main notice board and distributed to all its stake holders.

<b>Robust Anti-Corruption Management Policies &amp; Procedures</b>		
Criterion 12: The COP describes robust commitments,	1.Publicly stated formal policy of zero-tolerance of corruption.	Main notice board and distributed to all its stake holders.

strategies or policies in the area of anticorruption	<ul style="list-style-type: none"> <li>2. Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes.</li> <li>3. Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption.</li> <li>4. Detailed policies for high-risk areas of corruption.</li> <li>5. Policy on anti-corruption regarding business partners.</li> </ul>	
Criterion 13: The COP describes effective management systems to integrate the anticorruption principle	<ul style="list-style-type: none"> <li>1. Support by the organization's leadership for anti-corruption.</li> <li>2. Carrying out risk assessment of potential areas of corruption.</li> <li>3. Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees.</li> <li>4. Internal checks and balances to ensure consistency with the anticorruption commitment.</li> <li>5. Actions taken to encourage business partners to implement anti-corruption commitments.</li> <li>6. Management responsibility and accountability for implementation of the anti-corruption commitment or policy</li> <li>7. Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice.</li> <li>8. Internal accounting and auditing procedures related to anticorruption.</li> </ul>	Main notice board and distributed to all its stake holders.
Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anticorruption	<ul style="list-style-type: none"> <li>1. Leadership review of monitoring and improvement results.</li> <li>2. Process to deal with incidents.</li> <li>3. Public legal cases regarding corruption.</li> <li>4. Use of independent external assurance of anti-corruption programs.</li> <li>5. Outcomes of integration of the anti-corruption principle.</li> </ul>	Main notice board and distributed to all its stake holders.

<b>Taking action in Support of Broader UN Goals and Issues</b>		
Criterion 15: The COP describes core business contributions to UN goals and issues	<ol style="list-style-type: none"> <li>1. Align core business strategy with one or more relevant UN goals/issues.</li> <li>2. Develop relevant products and services or design business models that contribute to UN goals/issues.</li> <li>3. Adopt and modify operating procedures to maximize contribution to UN goals/issues.</li> </ol>	Main notice board and distributed to all its stake holders.
Criterion 16: The COP describes strategic social investments and philanthropy	<ol style="list-style-type: none"> <li>1. Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy.</li> <li>2. Coordinate efforts with other organizations and initiatives to amplify – and not negate or unnecessary duplicate - the efforts of other contributors.</li> <li>3. Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups.</li> </ol>	Main notice board and distributed to all its stake holders.
Criterion 17: The COP describes advocacy and public policy engagement	<ol style="list-style-type: none"> <li>1. Publicly advocate the importance of action in relation to one or more UN goals/issues.</li> <li>2. Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues</li> </ol>	Main notice board and distributed to all its stake holders.
Criterion 18: The COP describes partnerships and collective action	<ol style="list-style-type: none"> <li>1. Develop and implement partnership projects with public or private organizations (UN entities, governments, NGOs, or other groups) on core business, social investments and/or advocacy.</li> <li>2. Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain.</li> </ol>	Main notice board and distributed to all its stake holders.

<b>Sustainability Governance and Leadership</b>
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Criterion 19: The COP describes MANAGING DIRECTOR commitment and leadership	<p>1. Managing director publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact.</p> <p>2. MANAGING DIRECTOR promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards.</p> <p>3. MANAGING DIRECTOR leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation.</p> <p>4. Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for MANAGING DIRECTOR and executive management team.</p>	
Criterion 20: The COP describes Board adoption and oversight	<p>1. Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance.</p> <p>2. Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.</p> <p>3. Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on progress).</p>	
Criterion 21: The COP describes stakeholder engagement	<p>1. Publicly recognize responsibility for the company's impacts on internal and external stakeholders.</p> <p>2. Define sustainability strategies, goals and policies in consultation with key stakeholders.</p> <p>3. Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance.</p> <p>4. Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns, and protect "whistle-blowers".</p>	

<b>ANNEX Business and Peace</b>		
The COP describes policies and practices related to the	1. Information on how policies, strategies and operating practices have been adapted to the specific high-risk/conflict context based on due diligence.	

company's core business operations in high-risk or conflict-affected areas	<p>2. Adherence to best practices even where national law sets a lower standard, including in the management of security services.</p> <p>3. Management of the supply chain to avoid contributing to conflict through purchasing decisions and practices.</p>	
The COP describes policies and practices related to the company's government	<p>1. Assessment of opportunities for constructive engagement with government actors in order to support peace.</p> <p>2. Measures undertaken to avoid complicity in human rights violations by government actors.</p> <p>3. Management practices aimed at preventing corrupt relationships with government officials.</p>	
The COP describes local stakeholder engagement and strategic social investment activities of the company in high-risk or conflict affected areas	<p>1. Assessment of opportunities for constructive engagement with government actors in order to support peace.</p> <p>2. Stakeholder engagement mechanisms across company and contractor operations.</p> <p>3. Approaches to stakeholder engagement involving civil society, international organizations, etc</p> <p>4. Actions toward constructive and peaceful company-community engagement.</p> <p>5. Sustainable social investment projects.</p>	

BY ORDER

MANAGING DIRECTOR

NAVEEN SOOD

SUBMISSION DATE: 10-02-2021