

Bansal Ship Recyclers LLP

COMMUNICATION ON PROGRESS





Challenging SDGs | A way to Sustainability

About The COP

The Communication on Progress (COP) is an annual public disclosure to stakeholders on progress made toward gradually implementing the ten principles of the UN Global Compact, and supporting broader of UN seventeen sustainable development goals and issues. The COP serves to enhance transparency and accountability, drive continuous performance improvement, and provide a repository of corporate practices to promote dialogue and learning.

Approaches

This is the fifth Integrated Report of Bansal Ship Recyclers LLP. Our Integrated Report provides quantitative and qualitative disclosures on our relationships with the stakeholders and how our leadership, high integrity, culture, policy and strategy are aligned to deliver value while managing risks and Opportunities to the external environment. Our Report continues to evolve towards enhanced disclosures to meet the requirements of Health, Safety, Environmental and social parameters to lead with a sustainable business with social environment and stakeholders.

Reporting Period

The information is reported for the period April 1, 2021 to March 31, 2022. For comparative figures of key process indicators for the last five years have been incorporated in the Report to provide a comprehensive view.

It is the company's belief that by persistent efforts towards the ship recycling business, and consistent CSR activities that vouch to aid the growth of everyone around, the company will be able to soar high leaving all the prevalent macro-economic conditions, making the nation and the organization an evolved model of growth and change.



1. Statement of Director

I am pleased to confirm Bansal Ship Recyclers LLP continued support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. We became a signatory to the United Nations Global Compact in April 2017.

Bansal Ship Recyclers LLP, 2030 sustainability vision sets challenging aspirations and reflects the sentiments of our key stakeholders. We aim to restore nature, to tackle climate change and create shared social value. 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 upright.

In this annual Communication on Progress, we describe our actions to integrate the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders through our website and our annual Sustainability Review.

Yours sincerely,

Director Bansal Ship Recyclers LLP



Sustainability & Governance

Being a ship recycling industry our business concept broadly spelled out a role model for circular economy. Based on well-defined areas of responsibility and follow-up, the company ensures that it delivers on established sustainability targets. To tackle sustainability challenges, we also continuously develop our ambitions in dialogue with our stakeholders and external consultants.

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.

Sustainability governance helps us to implement sustainability strategy across the business, manage goal-setting and reporting processes, strengthen relations with external stakeholders, and ensure overall accountability.

Our considerations to build effective governance structure:

- Commitment begins at the top of the hierarchy.
- Organizational Structure.
- Policies and Plans alignment with structure.
- Identification of Risks and Opportunities
- Flexibility to adapt and build up on the sustainability program across business.
- Knowledge to stakeholder and communication System
- Monitoring
- Reporting

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.

Bansal Ship Recyclers LLP 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, anticorruption, labour and human rights, 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.

Company Name	Bansal Ship Recyclers LLP	Reporting Date	13.07.2022
Address	Bansal Ship Recyclers LLP Plot No.39, SRY, 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		
Website /Mail	www.bansalgroupindia.com hkc@bansalgroupindia.com		

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Bansal Ship Recyclers LLP

Certification

We are compliant with Norms and rules of **ISO** from **Lloyd's Register** 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, Lloyd's Register & Bureau Veritas with the internationally acceptable standards i.e. the Hong Kong Convention (HKC-2009) for sustainable ship recycling. We also received Certificate of compliance to EU SRR from Lloyd's Register and also adapted our system for Responsible ship recycling standards & EU commission.

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. Recently member of Recycling Solutions Pvt. Ltd. (Luthra Group) for co-processing and complete destruction of hazardous persistent organic pollutants in highly intensive incineration kilns.



- 4. Member of United Nations Global Compact challenging to SDGs & committed to conduct business in an ethical, legal and social responsibility manner.
- 5. 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.





Green Renewable Energy

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. 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.

Greenbelt Development

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.

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.

Good health and well being

Ensuring health is a positive concept emphasizing social and personal resources, as well as physical capacities. This means that health is a resource to support an individual's function in wider society, rather than an end in itself. A healthful lifestyle provides the means to lead a full life with meaning and purpose.





Training in safety is to include information about hazards, safe methods of working, avoidance of risks, and the wearing of PPE. When new methods, technologies, or processes are introduced, it is even necessary to retrain even those employees with long experience on older types of methods, technologies, or processes. Training and refresher courses for all levels of employees are particularly valuable. Training and refresher courses are to familiarize people with safe working methods, unsafe acts to be prohibited, safety rules, and the regulatory provisions associated with accident prevention. Training is to be conducted by experts and is to make use of effective audio-visual aids. Safety meetings or contacts are to be held regularly for all persons to reinforce safety training and awareness.



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

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.

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

VOLUNTARY

CERTIFICATE

CANCELLATION

Date: 20 May 2022 Reference: VC/0517/2022

Presented to:

CDM Project 5257: Combined cycle natural gas based grid connected power plant at Jegurupadu, India

Reason for cancellation:

For Bansal Ship Recyclers LLP Plot no.39, SRY, Alang, Bhavnagar, Gujarat-364081 (India) Reason to offset - I am offsetting greenhouse gas emissions for my company Year- 2020-2022



Number and type of units cancelled

Start serial number: IN-5-279660245-1-1-0-5257 End serial number: IN-5-279660884-1-1-0-5257 640 CERs Equivalent to 640 tonne(s) of CO2

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.

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Environmental Approach

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.

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.





Health and safety Approach

We have been strongly committed to creating preventative strategies and ensuring the proper health and safety of our workforce. A proper job hazard assessment is conducted and these assessments are supervised. A qualified person checks the oxygen content, presence of flammable gases, toxic and irritant gases, by using certified and calibrated equipment to ensure safe-for-entry conditions. A proper load testing of rigging equipment, hooks, and chains is conducted on a regular basis. Good quality PPEs and safety equipment are provided to all workers for protection from various risks and hazards. We have robust emergency preparedness and response plan. We are continuously working on making improvements in regards to the working conditions, occupational safety and health, and sustainability of the industry.



Responsible Ship Recycling Approach

Our ship recycling standard is based on the Hong Kong Convention interpretation regarding health, environmental, and safety issues. We have gone beyond the convention by adhering to the other international standards that includes labor and human rights, eliminating contact with the intertidal zone, waste management and subcontractor conditions.





Waste Management Approach

Considering aspect of waste management such as waste reduction, segregation of waste, disposal of waste, financial impacts of waste disposal and recording, monitoring, education and reviewing. These waste management procedures that have been put in place and demonstrate the benefits to the environment, how we can measure the effects and how these procedures and practices are sustainable.

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. Whenever hazardous wastes or materials containing such wastes are separated from the ship, contact with unprotected soil or the sea is prevented. Any contaminated material is either lifted (e.g. with a crane) onto impermeable floor or sealed in a way, that the soil or water cannot be contaminated



Approach on Anti-corruption

We have a written internal policy on anti-corruption which covers the Prohibition of bribery, Gifts and Hospitality, Facilitation Payments, and Financial Reports and Records. We ensure fair business practices and anti-competitive behavior which includes respect for intellectual property. Our anti-corruption policy has provisions on unethical conduct and reporting which include a no retaliation policy and protection of privacy of the whistleblowers.



Approach to Human Rights

Bansal Ship Recyclers LLP is about empowering employees to know and claim their rights and increasing the ability and accountability of individuals and institutions who are responsible for respecting, protecting and fulfilling rights.

This means giving people greater opportunities to participate in shaping the decisions that impact on their human rights. It also means increasing the ability of those with responsibility for fulfilling rights to recognize and know how to respect those rights, and make sure they can be held to account.

We have detailed description on plans and provisions for ensuring the health and safety of the workers. We provide all workers the same wage for equal work. Benefit and terms and conditions.



Key process indicators respective to health, safety and environment.

Sr. No.	Description	UNIT	2017	2018	2019	2020	2021	2022
		Health Sa	fety Indic	ators				
1	Fatality	NOS.	0	0	0	0	0	
2	Work Injury	NOS.	4	3	0	1	2	
	a. Lost workday case (LWC)	NOS.	0	1	0	0	0	
	b. Restricted Work Case (RWC)	NOS.	0	0	0	0	0	
	c. Permanent Total Disability (PTD)	NOS.	0	0	0	0	0	
	d. Permanent Partial Disability (PPD)	NOS.	0	0	0	0	0	
	e. First-Aid Case	NOS.	4	2	2	1	2	6
3	Occupational health disease	NOS.	0	0	0	0	0	
4	Medical Treatment Cases (MTCs) Visit to doctor	NOS.	0	1	0	1	0	
5	Near Miss	NOS.	4	3	3	5	7	4
6	Lost Time Injury (LTIs)= Fatalities +PTD +PPD + LWC	NOS.	0	1	0	0	0	
7	LTI frequency per year	NOS.	0	3.036929	0	0	0	
8	TOTAL RECORDABLE CASE (TRC)= LTIs + RWCs + MTCs	NOS.	0	2	0	1	0	
9	Worked Man-hours	Hrs	381056	329280	473,000	343,200	291600	
	EN	VIRONME	INT INDIC	CATORS				
1	Oil Spill	NOS.	0	0	0	0	0	
2	PROPERTY DAMAGE	NOS./INR	0	0	0	0	0	
3	OTHERS ENVIRONMENTAL POLLUTION	NOS.	0	0	0	0	0	

Bansal Ship Recyclers LLP, Plot No.39

NOTE: LTI freequency = Total loss time injury case*1000000/Total hours worked



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 in line with size & context of the organization. We shall strive to achieve this by:

- 1. Committed to Comply with Integrated Management System, Legislation, Regulations and other requirement.
- 2. Striving to achieve the occupational health, safety, human welfare, and environment objectives and targets.
- 3. Committed to eliminate hazards and reduce OH&S risks as well as consultation and participation of workers, and, where they exist, workers' representatives.
- 4. Continually improve the effectiveness of Integrated Management System to achieve satisfaction of employees, customers and other interested parties in line with the strategic direction of the organization.
- 5. Communicating this policy to all employees and make it available to interested parties and public.

This policy shall be reviewed regularly.

Reporting on SDGs of UN Global Compact

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



Alignment of ten principles with Bansal's Internal Policy structure

Entities	Principle	Policy	
Human	1: Businesses should support and respect the protection of internationally proclaimed human rights.	Policy statement on Labour &Human Rights	
Rights	2: Make sure that they are not complicit in human rights abuses.	Policy statement on Labour &Human Rights	
	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	
Labour	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	
	7: Businesses should support a precautionary approach to environmental challenges.	HSE Policy	
Environment	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	

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 indudtrial employment act 1946.
- Our Code of Conduct, which underscores our values and our commitment to ensuring a workplace that supports equal opportunity, dignity and respect.
- We engage with our clients (including suppliers, corporations, governments, financial institutions, nongovernmental organizations and individuals) and employees on human rights issues on an ongoing and as needed basis. We seek to empower clients and employees to take human rights criteria into consideration across our business activities, including through our Supplier Code of Conduct and our due diligence and client engagement processes outlined in our Environmental and Social Policy Statement.
- Our Environmental and Social Policy Statement, which reflects our commitment to human rights, and describes our approach to incorporating human rights into our transactional due diligence process.
- Safety observation and recommendation card system is implemented to find and render corrective actions on any of such non compliance.
- Works committee of employees & employers representative works effectively to deal with management regarding grivences, working condition, wages etc. with in business.

- The primary purpose of the committee is to provide oversight for the grievance process, including review of all grievances, review of trends of both complaints and grievances including time frames for resolution, identification of opportunities for improvement, and referral of action items to address those opportunities.
- A group of committed and trained people leading the effort as a social performance team. Our social performance team is formed to give compliance of the social trends.
- 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 comitted 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,

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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 national and internal regulations which can not harm human life.

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 <u>minimum wage</u> 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 statatory and regulatory requirements on equal 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 CO₂e emission so-called Scope1&2 emissions, and plan to set targets for prioritized areas, such as raw materials input, business travel and cars heading carbon <u>footprint offsetting</u>.

 Bansal Ship Recyclers LLP 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 20 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.

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

- Fully customized yard with impermeable RCC floor and established jetty to reach the subject ship on threshold of yard.
- * Establishment of heavy duty crane to have zero contact with sea water while disembarkation from ship.
- * Bansal Group also donated to a campaign called 'Cauvery Calling', in order to support farmers to plant 1,100 trees.
- * It is the Bansal Group's efforts towards rehabilitating and catering to marginalized communities and people, through the provision of bulk rations and digital technologies to health advisories that helped Mr. Kapoorchand Bansal receive the 'CSR Excellence of the Year' Award by Shri. Bhupendrasinh Chudasama, Cabinet Minister, Higher & Technical Education, Law & Justice, Legislative & Parliamentary Affairs, Salt Industry, Cow Breeding & Civil Aviation, Government of Gujarat.
- 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
- * 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, Bureau Veritas, a significant progress in occupational diseases and injuries compared to previous years. 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 20 KW based solar energy system to combat our power source is being utilized in our facility.
- Ensuring zero hunger food & ration distribution to the needy during COVID19 pandamaic.

Health, safety, environmental and social strategy for 2022

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

- Our continual focus on 2022 agenda towards Clean Water and Sanitation, Decent Work and Economic Growth, Industry, Reduced Inequality, Responsible Consumption and Production, Climate Action and Zero Hunger
- Gradually minimization of environmental pollution and climatic action is our motto.
- Improvement of socio-economic factors of labour and surrounding community.
- Bansal Ship Recyclers LLP is committed to continuously improving the working environment.
- Bansal Ship Recyclers LLP 2022 ambitions are strategic focus areas in workplace: health, safety, environment, anti-corruption, human rights and labour well-being.
- Bansal Ship Recyclers LLP embraces a zero-injury mind-set and will not accept people being injured as a result of our working conditions.
- Bansal Ship Recyclers LLP is committed to a sustainable health and safety strategy and falling trends in injury frequency rate with absence towards 2022.
- Good workplace ergonomics is a key element in ensuring long-term health for employees.
- Bansal Ship Recyclers LLP is committed to reducing work-related muscular/skeletal pain experienced by employees.
- Bansal Ship Recyclers LLP wants to take on broader responsibility for our people's wellbeing and thereby develop a systematic approach to supporting sustainable business performance and the healthy growth of the company.
- Bansal Ship Recyclers LLP strives to enable people to live longer, healthier and more productive lives.
- Bansal Ship Recyclers LLP is committed to improving mental well-being and reducing the level of stress symptoms among our employees.

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.

The secret of our change is to focus all of your energy not on fighting the old, but on building the new. Thank you for considering us safer, greener and efficient tomorrow.