



United Nations
Global Compact

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Your response has been recorded.

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CEO Statement of Continued Support

To our stakeholders,

I am pleased to confirm that Nakoda Chemicals Limited reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

In this annual Communication on Progress, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,

S1. Please complete the following information:

CEO/Highest-level executive name:

Mr. Raj Kumar Agrawal

CEO/Highest-level executive full title:

Managing Director

Company name:

Nakoda Chemicals Limited

S2. Please confirm:

- ☒ I am the CEO or highest-level executive.
- ☐ I have received permission to sign on behalf of the CEO or highest-level executive.

R1. How will you complete the 2024 CoP reporting requirement?

- ☒ Complete the digital questionnaire with the option to also add a sustainability report (*Recommended*)
- ☐ Only upload a sustainability report

R2. What is the time period covered by your Communication on Progress? (MM/YYYY – MM/YYYY)

Please share the date range of the reporting period used for the Communication on Progress option you select. ⓘ

04/2023 – 03/2024

R3. (Optional) Please clarify the scope of reporting covered by your Communication on Progress. For example, please describe the operational scope of your CoP, (e.g., corporate office, investments, subsidiaries) as needed. ⓘ

Nakoda Chemicals Limited

For endorsers of the CEO Water Mandate ONLY:

Endorsers of the CEO Water Mandate are asked to report supplemental water-specific information. Companies can find more information on the CEO Water Mandate and complete the reporting requirement as necessary through the CEO Water Mandate webpage [here](#). Respondents can access the submission tool directly through the Water Action Hub [here](#).

Private Mode:

Please indicate if you would prefer to publish in private mode. (Note – if selecting private mode the date of submission will be visible on your public profile, but your report and the information within will not be accessible by non-Global Compact staff.)

☒ **Publish in private mode**

Governance

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G1. Does the board/highest governance body or most senior executive of the company:

(Select all that apply) 

☒ **Issue an annual statement about the relevance of sustainable development to the company**

☒ **Issue an annual statement that addresses impacts on both people and the environment**

☒ **Issue an annual statement highlighting a zero tolerance for corruption**

☒ **Sign off on organizational sustainability targets**

☒ **Supervise Environmental, Social, and Governance reporting**

☒ **Regularly review potential risks related to the business model**

☐ None of the above

G1A. (Optional) Please provide additional information:

Nakoda Chemicals Limited (NCL) is a leading pharma organization with diverse R&D and manufacturing capabilities. NCL supplies high-quality active pharma ingredients and its intermediates (APIs) which are trusted by pharmaceutical organizations worldwide. NCL's purpose of "Supplying Quality APIs as a Responsible Value Chain Partner" has been the cornerstone for pursuing R&D and manufacturing of APIs meeting our stakeholder expectations related to Sustainability and

ESG as identified in the materiality assessment. NCL ensures fulfilling this purpose through leadership commitment, endorsing Voluntary National and International Sustainability Principles, implementing relevant policies, processes, certified management systems, and maturity assessments in ecovadis and other similar platforms, good environmental social governance practices to address the identified material topics and stakeholder expectations related to Sustainability and ESG. NCL is a UNGC participant organization and is in the process to submit its commitment to SBTi. NCL has implemented certified ISO 14001:2015 Environmental Management Systems, ISO 45001:2018 Occupational Health & Safety Management Systems, ISO 50001:2018 Energy Management Systems and SA 8000:2014 Social Accountability Standards. While in this journey, NCL aligns its focus and actions to voluntarily support the National Guidelines on Responsible Business Conduct (NGRBC), the relevant UN Sustainable Development Goals (UNSDGs) as promoted by the Government of India, the United Nations Global Compact (UNGC) and the Science Based Targets initiative (SBTi). NCL firmly believes that its responsible business is well poised for inclusive enviro-socio-economic transformations truly supporting Sustainability and ESG and the same will be highlighted in its Sustainability & ESG Report being published in 2024, which will be made available in the company website <https://nakodachemical.com/>.

G2. Does the company have a publicly stated commitment regarding the following sustainability topics?

(Select one answer per line) ⓘ

	No, this is not a current priority	No, but we plan to within the next two years	Yes, and the commitment is focused on our own operations	Yes, and the commitment includes our own operations and suppliers	Yes, and the commitment includes our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

G2A. (Optional) Please provide additional information:

NCL's publicly stated commitments on Labour Rights/Decent Work and Human Rights are part of its Social Accountability Policy. NCL's publicly stated commitments on Environment are part of its Environmental Sustainability Policy and Energy Management Policy. NCL's publicly stated commitments on Occupational Health & Safety are part of Occupational Health & Safety Policy.

G2A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

G2A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

G3. Does the company have a code of conduct in place regarding each of the following sustainability topics?

(Select one answer per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on employees	Yes, focused on employees and suppliers	Yes, focused on our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

G3A. (Optional) Please provide additional information:

NCL's publicly stated commitments on Business Ethics/Anti-Corruption is part of Code of Conduct. NCL's publicly stated commitments on Labour Rights/Decent Work and Human Rights, Environment, Occupational Health & Safety and Business Ethics/Anti-corruption in supply chain are part of Sustainable Procurement Policy and Suppliers Code of Conduct. These policies will be made available in our website <https://nakodachemical.com/>.

G4. Has the company appointed an individual or group responsible for each of the following sustainability topics?

(Select one answer per line) 

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision- making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

G4A. (Optional) Please provide additional information:

NCL has implemented relevant (Labour Rights/Decent Work, Human Rights, Energy, Environment, Occupational Health & Safety, Business Ethics/Anti-Corruption) management systems and committed to continually enhance its material sustainability topics in its operations and supply chain in systematic manner. These efforts are implemented by cross functional Health & Safety Committee led by EHS, Social Performance Team led by HR and Ethics Team led by Director in the Board.

G5. Does the company have a formal structure(s) (such as a cross-functional committee) to address each of the following sustainability topics?

(Select one answer per line) 

	No formal structure	Yes, with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, involves one or more members of senior management)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of the company)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

G5A. (Optional) Please provide additional information:

NCL has implemented relevant (Labour Rights/Decent Work, Human Rights, Energy, Environment, Occupational Health & Safety, Business Ethics/Anti-Corruption) management systems and committed to continually enhance its material sustainability topics in its operations and supply chain in systematic manner. These efforts are implemented by cross functional Health & Safety Committee led by EHS, Social Performance Team led by HR and Ethics Team led by Director in the Board.

G6. Does the company have a process(es) to assess risk?

(Select one answer per line) 

	No, this is not a current priority	No, but we are planning to develop on within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

G6A. (Optional) Please provide additional information:

NCL has implemented Social Risk Assessment for aspects related to Labour Rights/Decent Work, Human Rights in its operations and supply chain. NCL has implemented EHS Risk Assessments for aspects related to Energy, Environment, Occupational Health & Safety in its operations and supply chain. NCL has implemented Ethics Risk Assessment for aspects related to Business Ethics/Anti-Corruption in its operations and supply chain. NCL's publicly stated commitments on Business Ethics/Anti-Corruption for own operations is part of Code of Conduct. NCL's publicly stated commitments on Business Ethics/Anti-corruption in supply chain is part of Suppliers Code of Conduct. These policies will be made available in our website <https://nakodachemical.com/>.

G6.1. During the assessment of risk, has the company identified suppliers and/or other business relationships where the risk related to human rights, labour, environment and/or anti-corruption may be particularly severe?

(Select one answer per line) 

	No	Yes
Human rights risks	<input checked="" type="radio"/>	<input type="radio"/>
Labour rights risks	<input checked="" type="radio"/>	<input type="radio"/>
Environmental risks	<input checked="" type="radio"/>	<input type="radio"/>
Corruption risks	<input checked="" type="radio"/>	<input type="radio"/>

G6.1A. (Optional) Please provide additional information:

NCL has implemented an Environmental and Social Assessment (ESA) process in its supply chain to assess potential risks related to Labour Rights/Decent Work, Human Rights, Energy, Environment, Occupational Health & Safety and Business Ethics/Anti-Corruption. During the reporting period few supplier ESA carried out and no severe potential risk reported. NCL monitors its actual and potential negative impacts on sustainability topics for its operations through daily dashboard as part of due diligence process to identify, prevent, mitigate, and account for such impacts.

G7. Does the company have a due diligence process through which it identifies, prevents, mitigates, and accounts for actual and potential negative impacts on sustainability topics?

(Select one answer per line) ⓘ

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

G7A. (Optional) Please provide additional information:

NCL has implemented an Environmental and Social Assessment (ESA) process in its supply chain to assess potential risks related to Labour Rights/Decent Work, Human Rights, Energy, Environment, Occupational Health & Safety and Business Ethics/Anti-Corruption. During the reporting period few supplier ESA carried out and no severe potential risk reported. NCL monitors its actual and potential negative impacts on sustainability topics for its operations through daily dashboard as part of due diligence process to identify, prevent, mitigate, and account for such impacts.

G8. Does the company have a process(es) through which members of the company's workforce can raise concerns about the company's conduct on sustainability topics?

(Select one option) 1

	No, this is not a current priority	No, but we plan to within two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, we have a formal process
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

G8A. (Optional) Please provide additional information:

NCL's workforce can raise concerns about company's/its suppliers conduct on material sustainability topics under grievance and whistle-blower processes. They can also do so through suggestions, during review meetings and trainings. Workforce is encouraged to share ideas for continual improvement.

G8.1. Please provide additional detail regarding the process(es) the company has through which members of the company's workforce can raise concerns about the company's conduct.

(Select one answer per line) 1

	No	Yes
Is the process communicated to all employees/workers in local languages?	<input type="radio"/>	<input checked="" type="radio"/>
Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?	<input type="radio"/>	<input checked="" type="radio"/>
Is the process confidential (e.g., whistleblowing process)?	<input type="radio"/>	<input checked="" type="radio"/>

	No	Yes
Are there processes in place to avoid retaliation?	<input type="radio"/>	<input checked="" type="radio"/>
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)?	<input type="radio"/>	<input checked="" type="radio"/>
Other (Please provide additional information)	<input checked="" type="radio"/>	<input type="radio"/>

G8.1A. (Optional) Please provide additional information:

NCL's workforce can raise concerns about company's/its suppliers conduct on material sustainability topics under grievance and whistle-blower processes. They can also do so through suggestions, during review meetings and trainings. Workforce is encouraged to share ideas for continual improvement.

G9. How does the company capture lessons regarding each of the following sustainability topics?

(Select one answer per line) i

	No lessons are regularly captured	Conducts investigation/review of incidents as needed	Conducts investigation/review of incidents and changes organizational policies, processes, and practices accordingly	Conducts investigation/review and leverages learnings to influence both internal and external affairs
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

G9A. (Optional) Please provide additional information:

NCL has implemented process to report incidents/deviations related to material sustainability topics. The reported incidents/deviation are investigated to find root-cause/most probable cause and CAPs are planned to address such causes to prevent recurrence. Lessons learned from this process is shared with all the concerned stakeholders.

G10. Is executive pay linked to performance on one or more of the following sustainability topics?

(Select one answer per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

G10A. (Optional) Please provide additional information:

The linking of executive pay with performance will be reviewed by the Board at an opportune time.

G11. Please provide details regarding the company's board/highest governance body.

(Select one answer per line, if 'Known', include the value) 

	Known	Not applicable	Number (Please input answer as a whole number (e.g., 95% = 95))
Total number of board members (#)	<input checked="" type="radio"/>	<input type="radio"/>	3
Male (%)	<input checked="" type="radio"/>	<input type="radio"/>	66.67
Female (%)	<input checked="" type="radio"/>	<input type="radio"/>	33.33
Non-binary (%)	<input type="radio"/>	<input checked="" type="radio"/>	
Under 30 years old (%)	<input type="radio"/>	<input checked="" type="radio"/>	

	Known	Not applicable	Number (Please input answer as a whole number (e.g., 95% = 95))
30-50 years old (%)	<input type="radio"/>	<input checked="" type="radio"/>	
Above 50 years old (%)	<input checked="" type="radio"/>	<input type="radio"/>	3
From minority or vulnerable groups (%)	<input type="radio"/>	<input checked="" type="radio"/>	
Executive (%)	<input checked="" type="radio"/>	<input type="radio"/>	2
Independent (%)	<input checked="" type="radio"/>	<input type="radio"/>	1

G11A. (Optional) Please provide additional information:

G12. Do you produce sustainability reporting according to:

(Select all that apply) 

- ☒ **National/local regulation on sustainability**
 - ☐ Security exchange regulations
 - ☐ Non-Financial Reporting Directive of the European Union (NFRD)/Corporate Sustainability Reporting Directive (CSRD)
- ☒ **Global Reporting Initiative (GRI)**
 - ☐ Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
 - ☐ International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
 - ☐ Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
 - ☐ Task Force on Climate-related Financial Disclosures (TCFD)
 - ☐ Other voluntary frameworks (Please provide additional information)
 - ☐ No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

G12A. (Optional) Please provide additional information:

Sustainability & ESG Report is being prepared and will be made available in our website <https://nakodachemical.com/> by end of 2024-Q3.

G13. Is the information disclosed in this questionnaire assured by a third-party?

(Select all that apply) 

- ☒ **Limited assurance for minority of metrics (e.g., GHG emissions only)**
- ☐ Limited assurance for majority of metrics
- ☐ Reasonable assurance for minority of metrics
- ☐ Reasonable assurance for majority of metrics
- ☐ Other (Please provide additional information)
- ☐ No assurance for any metrics

G13A. (Optional) Please provide additional information:

Limited assurance for Scope 1 and Scope 2 GHG emissions only.

Human Rights

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HR1. Which of the following has the company identified as material human rights topics connected with its operations and/or value chain, whether based on their salience (e.g., the most severe potential negative impacts on people) or another basis?

(Select all that apply) 

- ☒ **Freedom of association and the effective recognition of the right to collective bargaining**
- ☒ **Child labour**
- ☒ **Forced labour**
- ☒ **Non-discrimination in respect of employment and occupation**

- ☒ Safe and healthy working environment
- ☒ Working conditions (wages, working hours)
- ☒ Freedom of expression
- ☒ Access to water and sanitation
- ☒ Digital security / privacy
- ☒ Gender equality and women's rights
- ☐ Rights of indigenous peoples
- ☐ Rights of refugees and migrants
- ☐ Other

HR1A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights and established the Social Accountability Policy to address such material topics through Social Accountability management system in compliance with SA 8000:2014 standards.

Note: Labour rights topics (Freedom of association and the effective recognition of the right to collective bargaining, child labour, forced labour, non-discrimination in respect of employment and occupation, and a safe and healthy working environment) are a subset of human rights and for completeness, were included in this question. Regardless of these labour topics being selected as material in this question or not, all companies will be asked to provide additional details about these labour rights topics in the next section (L.1 and following). For the other human rights topics selected as material in this question, seven additional questions will be asked in the following section.

HR2. Does the company have a policy commitment in relation to the following human rights topics?

(Select one answer per line, if 'Yes', include the value) 

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included in our policy	Year policy last reviewed (YYYY)
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	2023
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	2024
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	2023
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	2023

HR2A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights and established the Social Accountability Policy to address such material topics through Social Accountability management system in compliance with SA 8000:2014 standards. NCL has identified the material sustainability topics related to human rights & labour rights through stakeholder engagement and materiality assessment.

HR2A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

HR2A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

HR2.1. For each human rights policy commitment, is it:

(Select all that apply) 

	Aligned with international human rights standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers
Freedom of expression	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Access to water and sanitation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Digital security / privacy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Gender equality and women's rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	Developed involving human rights expertise from inside and outside the company	Other (Please provide additional information)	
Freedom of expression		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Access to water and sanitation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Digital security / privacy		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Gender equality and women's rights		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

HR2.1A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights through stakeholder engagement and materiality assessment.

HR3. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following human rights topics?

(Select one answer per line) 

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question
Freedom of expression	<input checked="" type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input checked="" type="radio"/>	<input type="radio"/>
Digital security / privacy	<input checked="" type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input checked="" type="radio"/>	<input type="radio"/>

HR3A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights through stakeholder engagement and materiality assessment.

HR4. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following human rights topics?

(Select all that apply) 

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. partners, suppliers, clients, etc.)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue
Freedom of expression	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to water and sanitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Digital security / privacy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender equality and women's rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Freedom of expression	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Access to water and sanitation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Digital security / privacy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender equality and women's rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>

HR4A. (Optional) Please provide additional information:

NCL has taken actions to prevent or mitigate risks and impacts associated with the material sustainability topics related to human rights & labour rights and more details are provided in respective sections of Social Accountability Management System Manual (Sections 9.3, 9.8). Specific information can be shared on request.

HR5. Who receives training for the following human rights topics?

(Select all that apply) 

No training provided	Select employees	All employees	Contractors	Direct suppliers
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Freedom of expression	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Access to water and sanitation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Digital security / privacy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Gender equality and women's rights	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

			Indirect suppliers	Other – such as partners, clients, etc.
Freedom of expression			<input type="checkbox"/>	<input type="checkbox"/>
Access to water and sanitation			<input type="checkbox"/>	<input type="checkbox"/>
Digital security / privacy			<input type="checkbox"/>	<input type="checkbox"/>
Gender equality and women's rights			<input type="checkbox"/>	<input type="checkbox"/>

HR5A. (Optional) Please provide additional information:

More details on training related to human rights & labour rights is provided in Section 9.9 of Social Accountability Management System Manual. Specific information can be shared on request.

HR6. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights topics?

(Select one answer per line) 

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	Set annual targets/goals, track progress over time <input checked="" type="radio"/>	Set annual targets/goals, track progress over time <input checked="" type="radio"/>	<input type="radio"/>
					Other (Please ...)

HR6A. (Optional) Please provide additional information:


More details on risk assessment related to human rights & labour rights is provided in Section 9.3 of Social Accountability Management System Manual. Specific information can be shared on request.

HR7. Within the reporting period, has the company been involved in providing or enabling remedy if it has caused or contributed to adverse impact(s) associated with the following human rights topic(s)?

(Select one answer per line) 

	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

HR7A. (Optional) Please provide additional information:

HR8. Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the human rights principles, including any challenges faced and actions taken towards prevention and/or remediation. 

We will explore opportunity to improve our existing social accountability management systems related to human rights continually.

[Click for additional guidance](#)

L1. Does the company have a policy in relation to the following labour rights topics?

(Select one answer per line, if 'Yes', include the value)ⁱ

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Year policy last reviewed (YYYY)

Freedom of association and the effective recognition of the right to collective bargaining

2023

Forced labour

2023

Child labour

2023

Non-discrimination in respect of

Non-discrimination in respect of employment and occupation	2023 Year policy last reviewed (yyyy)
Safe and healthy working environment	2010
Working conditions (wages, working hours)	2023

L1A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights and established the Social Accountability Policy to address such material topics through Social Accountability management system in compliance with SA 8000:2014 standards.

L1A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

L1A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

L1.1. For each labour rights policy commitment, is it:

(Select all that apply) 

Aligned with international	Approved at most senior level	Applied to the company's	Applied to the company's own operations

	labour standards	Publicly available	of the company	own operations	Applied to the company's suppliers
Freedom of association and the effective recognition of the right to collective bargaining	Aligned with international labour standards 	Publicly available 	Approved at most senior level of the company 	Applied to the company's own operations 	Applied to the company's own operations and suppliers 
Forced labour					
Child labour					
Non-discrimination in respect of employment and occupation					
Safe and healthy working environment					
Working conditions (wages, working hours)					
	Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	Developed in consultation with workers and their representatives		Developed involving labour expertise from inside and outside the company	Other (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>				<input type="checkbox"/>
Forced labour	<input type="checkbox"/>				<input type="checkbox"/>
Child labour	<input type="checkbox"/>				<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>				<input type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>				<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>				<input type="checkbox"/>

L1.1A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights and established the Social Accountability Policy to address such material topics through Social Accountability management system in compliance with SA 8000:2014 standards.

L1.2. Does the company's policy on freedom of association and collective bargaining:

(Select all that apply) 

- ☒ **Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of antiunion discrimination**
- ☒ **Prohibit any acts of interference in trade unions**
- ☒ **Facilitate collective bargaining with the trade union representatives**
- ☒ **Provide trade union representatives with the information required for meaningful bargaining in the context of bona fide negotiations**
- ☒ **Reference the respect for the right of workers to submit grievances without suffering**
- ☐ We do have a policy on freedom of association or collective bargaining but it does not include any of these details
- ☐ We do not have a policy on freedom of association or collective bargaining

L1.2A. (Optional) Please provide additional information:

NCL has implemented a Social Accountability management system in compliance with SA 8000:2014 standards, wherein these concerns are addressed under "Section 4 Freedom of Association & Right to Collective Bargaining". As per this requirement, workers union negotiates with the management about terms of employment, including pay, benefits, working-hours etc. and the same is documented in the collective agreements with employee union and the management.

L2. Within of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following labour rights topics?

(Select one answer per line) 

No	To better understand the	To discuss potential ways to prevent or mitigate the	To agree on a way to prevent/mitigate
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	engagement on this topic	risks/impacts in question	risks/impacts in question To discuss potential ways to prevent or mitigate the risks/impacts in question	the risks/impacts in question To agree on a way to prevent/mitigate the risks/impacts in question
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/> No engagement on this topic	<input type="radio"/> To better understand the risks/impacts in question	<input type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

L2A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights through stakeholder engagement and materiality assessment and associated risks and opportunities are

stakeholder engagement and materiality assessment and associated risks and opportunities are identified and prevented/mitigated the same.

L3. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following labour rights topics?

(Select all that apply) 

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Child labour	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

	Collective action with peers or other stakeholders, in particular workers' organizations, to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Child labour	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Non-discrimination in respect of

Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Collective action with peers or other stakeholders, in particular workers' organizations, to address the issue

Collaborated with governmental or regulatory bodies

Other (Please provide additional information)

L3A. (Optional) Please provide additional information:

NCL has identified the material sustainability topics related to human rights & labour rights through stakeholder engagement and materiality assessment and associated risks and opportunities are identified and prevented/mitigated the same. NCL has taken actions to prevent or mitigate risks and impacts associated with the material sustainability topics related to human rights & labour rights and more details are provided in respective sections of Social Accountability Management System Manual (Sections 9.3, 9.8). Specific information can be shared on request.

L4. Who receives training for the following labour rights topics?

(Select all that apply) 

	No training provided	Select employees	All employees	Contractors	Direct suppliers
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Child labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Indirect suppliers
Other – such as partners, clients, etc.

Freedom of association and the effective

	recognition of the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>
		Indirect suppliers	Other – such as partners, clients, etc.
·	Forced labour	<input type="checkbox"/>	<input type="checkbox"/>
·	Child labour	<input type="checkbox"/>	<input type="checkbox"/>
·	Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>
·	Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>
·	Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>

L4A. (Optional) Please provide additional information:

NCL provides training on material sustainability topics related to human rights & labour rights to all employees through induction training during joining and thereafter annual refresher training. NCL provides training on material sustainability topics related to human rights & labour rights to direct suppliers as part of suppliers environmental and social assessment process while on-boarding them. Suppliers are also kept informed on these requirements through Purchase Orders along with Supplier Code of Conduct. More details on training related to human rights & labour rights is provided in Section 9.9 of Social Accountability Management System Manual. Specific information can be shared on request.

L5. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following labour rights topics?

(Select one answer per line) 

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	Set annual targets/goals, track progress over time (internal programmes only) <input checked="" type="radio"/>	Set annual targets/goals, track progress over time (internal and external programmes) <input type="radio"/>
Working conditions (wages, working hours)	No monitoring of progress <input type="radio"/>	Review topics on ad hoc basis <input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other (Please provide additional information)

Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>
Forced labour	<input type="radio"/>
Child labour	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>

L5A. (Optional) Please provide additional information:

NCL tracks and analyse incidents/deviations related to labor rights / human rights violations, such as discrimination, child labour, health & safety, working conditions, etc. which helps to identify systemic issues and trends. NCL has reporting mechanisms to concerned officials and necessary actions taken to address any reported incident/deviation. Specific information can be shared on request. KPI's related to labor rights / human rights are set annually and progress made is monitored through periodic management reviews.

L6. Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than those provided in legislation, where appropriate?

(Select all that apply) ⁱ

- ☒ **Yes, by providing more favourable conditions related to wages**
- ☐ Yes, by providing more favourable conditions related to working hours
- ☒ **Yes, by providing more favourable conditions related to health coverage and/or sick leave**

- ☐ Yes, by providing additional rights not otherwise provided (Please provide additional information)
- ☐ There is (are) no existing collective bargaining agreement(s)
- ☐ No

L6A. (Optional) Please provide additional information:

NCL has implemented a Social Accountability management system in compliance with SA 8000:2014 standards, wherein these concerns are addressed under "Section 4 Freedom of Association & Right to Collective Bargaining". As per this requirement, workers union negotiates with the management about terms of employment, including pay, benefits, working-hours etc. and the same is documented in the collective agreements with employee union and the management.

L7. Within the reporting period, what was the percentage of women in managerial positions? ⓘ

- ☒ Percent women - (Please input answer as a whole number (e.g., 95% = 95))
- ☐ Unknown

10

L7A. (Optional) Please provide additional information:

Promoting diversity, equity and inclusion (DEI) in operations and supply chain is one of the key commitment of NCL.

L8. What was the average ratio of the basic salary and remuneration of women to men (comparing jobs of equal value) within the reporting period? ⓘ

- ☒ Salary ratio (Women/Men %) - (Please input answer as a whole number (e.g., 95% = 95))
- ☐ Unknown
- ☐ Choose to not disclose

79.21

L8A. (Optional) Please provide additional information:

L9. Within the reporting period, how frequently were workers injured (injuries per hour worked)? [i](#)

☒ **Frequency of injury**

☐ Unknown

☐ Choose to not disclose

0.00

L9A. (Optional) Please provide additional information:

In the reporting period, Reportable Lost Time Injury Frequency Rate was 0.00.

L10. Within the reporting period, what was the company's incident rate (injuries per worker)? [i](#)

☒ **Incident Rate**

☐ Unknown

☐ Choose to not disclose

0.00

L10A. (Optional) Please provide additional information:

In the reporting period, Reportable Lost Time Incident Rate was 0.00.

L11. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following labour rights topics? (Select one answer per line) [i](#)

No remedy

Yes, remedy

No adverse impact
identified or

Choose to not

	provided/enabled	provided/enabled	caused No adverse impact identified or caused	disclose Choose to not disclose
Freedom of association and the effective recognition of the right to collective bargaining	No remedy provided/enabled	Yes, remedy provided/enabled		
	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

L11A. (Optional) Please provide additional information:

L12. Briefly describe additional relevant practical actions the company has taken within the reporting period and/or plans to take to implement the labour rights principles, including any challenges faced and actions taken towards prevention and/or remediation.ⁱ

We will explore opportunity to improve our existing social accountability management systems related to labour rights continually.

Environment

[Click for additional guidance](#)

E1. Does the company have a policy commitment in relation to the following

environmental topics?

(Select one answer per line, if 'Yes', include the value) 

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Year policy was last updated (YYYY)
Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2023
Water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2012
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2012
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2012
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2023

EIA. Not applicable (Please provide additional information):

Our facility is located in an notified industrial area.

EIA. (Optional) Please provide additional information:

NCL's publicly stated commitments on Environment are part of its Environment Health & Safety Policy and Energy Policy.

EIA. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

E1A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

E1.1 For each environmental policy commitment, is it:

(Select all that apply) ⓘ

	Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers
Climate change	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Water	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Air pollution	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Energy & resource use	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Applied to the company's own operations and the value chain (e.g., suppliers, consumers,

Developed involving environmental

	Applied to the business operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	expertise from inside and outside the company	Other (Please provide additional information)
Climate change	<input type="checkbox"/>	<input checked="" type="checkbox"/> Developed involving environmental expertise from inside and outside the company	<input type="checkbox"/> Other (Please provide additional information)
Water	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Energy & resource use	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

E1.1A. (Optional) Please provide additional information:

E2. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following environmental topics?

(Select one answer per line) 

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
Climate change	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

E2A. (Optional) Please provide additional information:

This is done through stakeholder engagement and materiality assessment for identifying material sustainability topics applicable for NCL.

E3. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select all that apply) 

	No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue
Climate change	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Water	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Oceans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Forests/Biodiversity/Land use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	No action within reporting period <input type="checkbox"/>	Provided internal training/capacity building for the direct workforce <input checked="" type="checkbox"/>	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities) <input checked="" type="checkbox"/>	Conducted an audit process and/or corrective action plan <input checked="" type="checkbox"/>	Collective action with peers or other stakeholders to address the issue <input checked="" type="checkbox"/>
Energy & resource use	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Water	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Oceans	<input type="checkbox"/>	<input type="checkbox"/>
Forests/Biodiversity/Land use	<input type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Energy & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>

E3A. (Optional) Please provide additional information:

E4. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select one answer per line) 

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

E4A. (Optional) Please provide additional information:

E4.1. For each environmental topic for which the company sets timebound goals/targets, what kind of targets has the company set?

Please provide a description of targets (e.g., what is the target, absolute vs. intensity, externally verified, on track, etc.) [i](#)

Climate change	<input type="text" value="Intensity target set."/>
Water	<input type="text" value="Intensity target set."/>
Air pollution	<input type="text" value="Intensity target set."/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="text" value="Intensity target set."/>
Energy & resource use	<input type="text" value="Intensity target set."/>

E4.2. For each environmental topic in which the company sets timebound

goals/targets, how is progress against target/goal tracked?

(Select one answer per line) 

	Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information)
Climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Water	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Energy & resource use	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

E4.2A. (Optional) Please provide additional information:

Through regular monitoring and management reviews.

E5. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following environmental topics?

(Select one answer per line) 

	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Climate change	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Waste (e.g., chemical	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

spills, solid waste,
hazardous, plastic, etc.)

No remedy
provided/enabled

Yes, remedy
provided/enabled

No adverse
impact identified
or caused

Choose to not
disclose

Energy & resource
use

E5A. (Optional) Please provide additional information:

E6. What were the company's gross Scope 1 and/or Scope 2 global greenhouse gas (GHG) emissions within the reporting period?

(Select one answer per line, if "Known", include the value) [i](#)

We did not measure
our gross emissions
[Please explain in the
text box]

Known

Measured Total Emissions (tCO₂e)

Scope 1
emissions



2855.43

Scope 2
emissions



2067.12

E6A. (Optional) Please provide additional information:

E7. What were the company's gross Scope 3 global greenhouse gas (GHG) emissions within the reporting period? [i](#)

☐ We measured Scope 3 GHG emissions [Please input the measured tCO₂e in the text box below]

☒ **We did not measure Scope 3 GHG emissions**

E7A. (Optional) Please provide additional information:

We have started capturing relevant data for Scope 3 GHG emissions and the same will be reported in the next year.

E8. What percentage of the company's revenue was invested in R&D of low-carbon products/services within the reporting period?ⁱ

☐ Percent of revenue (%) -
(Please input answer as a
whole number (e.g., 95% =
95))

☐ Unknown

☒ **Not applicable (Please
provide additional
information)**

E8A. Not applicable (Please provide additional information):

We manufacture pharmaceutical products and R&D is focused in the area of pharmaceutical products development.

E8A. (Optional) Please provide additional information:

E9. Has the company acted to support climate change adaptation and resilience?

(Select all that apply)ⁱ

- ☒ **We have taken action to increase company-wide resilience to climate change**
- ☐ We have taken action to increase resilience in our supply chains
- ☐ We have taken action to increase resilience in the communities in which we operate
- ☒ **We have provided funding for climate change adaptation and resilience initiatives and projects**
- ☐ We have not taken actions to build climate change resilience in the reporting period
- ☐ Unknown

E9A. (Optional) Please provide additional information:

We will take action to increase climate change resilience in our supply chain and communities from the next year.

E10. Please report the company's renewable energy consumption as a percentage of total energy consumption within the reporting period.ⁱ

Percent of total energy consumption -

☒ **(Please input answer as a whole number (e.g., 95% = 95))**

☐ Unknown

15

E10A. (Optional) Please provide additional information:

We use biomass fuel in boiler.

E11. What percent of the company's revenue came from low-carbon products/services within the reporting period? If applicable, please give a description of the products/services included in your calculation (e.g., relevant certifications).ⁱ

Percent of total revenue (%)

- (Please input answer as a whole number (e.g., 95% = 95))



Unknown



Not applicable (Please provide additional information)

E11A. Not applicable (Please provide additional information):

We manufacture pharmaceutical products and we focus on reducing carbon footprint of our products continually.

E12. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

(Select all that apply)ⁱ

- ☒ **Water [Prompts E13, E14]**
- ☐ Forests, Biodiversity, and Land use [Prompts E15, E16, E17]
- ☒ **Air pollution [Prompts E18]**
- ☒ **Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.) [Prompts E19, E20, E21]**
- ☐ None of the topics have been identified as material by the company

E12A. (Optional) Please provide additional information:

E13. Please provide details regarding the company's water withdrawal and consumption (own operations) within the reporting period.

(Select one answer per line, if "Known", include the value) 

	Known	Unknown
Total water withdrawal:	<input checked="" type="radio"/>	<input type="radio"/>
Fresh surface water withdrawal:	<input checked="" type="radio"/>	<input type="radio"/>
Groundwater withdrawal:	<input type="radio"/>	<input type="radio"/>
Brackish surface water/seawater withdrawal:	<input type="radio"/>	<input type="radio"/>
Produced water withdrawal:	<input type="radio"/>	<input type="radio"/>
Third-party water withdrawal:	<input checked="" type="radio"/>	<input type="radio"/>
Percentage of water withdrawn in regions with high or extremely high water stress(%):	<input type="radio"/>	<input type="radio"/>
Total water consumption:	<input type="radio"/>	<input checked="" type="radio"/>
Fresh surface water consumption:	<input type="radio"/>	<input checked="" type="radio"/>
Groundwater consumption:	<input type="radio"/>	<input type="radio"/>
Brackish surface water/seawater consumption:	<input type="radio"/>	<input type="radio"/>
Produced water consumption:	<input type="radio"/>	<input type="radio"/>

Third-party water consumption:	<input type="radio"/>	Known	<input checked="" type="radio"/>	Unknown
Percentage of water consumed in regions with high or extremely high water stress(%):	<input type="radio"/>		<input type="radio"/>	
Not applicable (Please provide additional information)				
Total water withdrawal:			<input type="radio"/>	
Fresh surface water withdrawal:			<input type="radio"/>	
Groundwater withdrawal:			<input checked="" type="radio"/>	
Brackish surface water/seawater withdrawal:			<input checked="" type="radio"/>	
Produced water withdrawal:			<input checked="" type="radio"/>	
Third-party water withdrawal:			<input type="radio"/>	
Percentage of water withdrawn in regions with high or extremely high water stress(%):			<input checked="" type="radio"/>	
Total water consumption:			<input type="radio"/>	
Fresh surface water consumption:			<input type="radio"/>	
Groundwater consumption:			<input checked="" type="radio"/>	
Brackish surface water/seawater consumption:			<input checked="" type="radio"/>	
Produced water consumption:			<input checked="" type="radio"/>	
Third-party water consumption:			<input type="radio"/>	
Percentage of water consumed in regions with high or extremely high water stress(%):			<input checked="" type="radio"/>	

	Volume of water in megaliters
Total water withdrawal:	<div>17.12</div>
Fresh surface water withdrawal:	<div>11.07</div>
Groundwater withdrawal:	<div></div>
Brackish surface water/seawater withdrawal:	<div></div>
Produced water withdrawal:	<div></div>

Produced water withdrawal:	Volume of water in megaliters
Third-party water withdrawal:	6.05
Percentage of water withdrawn in regions with high or extremely high water stress(%):	
Total water consumption:	
Fresh surface water consumption:	
Groundwater consumption:	
Brackish surface water/seawater consumption:	
Produced water consumption:	
Third-party water consumption:	
Percentage of water consumed in regions with high or extremely high water stress(%):	

E13A. Not applicable (Please provide additional information):

Water is withdrawn from surface water and third party water sources.

E13A. (Optional) Unknown (Please provide additional information):

E13A. (Optional) Please provide additional information:

E14. Please provide details about the company’s water intensity of products in regions with high or extremely high water stress.ⁱ

☐ Water intensity of products (cubic meter/\$ OR cubic meter/product type):

☐ Unknown

☒ Not applicable (Please provide additional information)

E14A. Not applicable (Please provide additional information):

Our facility is not located in high or extremely high water stress region.

E14A. (Optional) Please provide additional information:

E15. Please report the number and area (in hectares) of sites owned, leased, or managed by the company in or adjacent to protected areas and/or key biodiversity areas (KBA).

(Select one answer per line, if "Known", include the value)ⁱ

	Known	Unknown	Not applicable (Please provide additional information)	Number
Sites	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<div></div>
Hectares	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<div></div>

E15A. Not Applicable (Please provide additional information):

Our facility is located in a notified industrial area.

E16. In hectares, please report the area of natural ecosystems converted in areas owned, leased, or managed by the company (if any) within the reporting period.ⁱ

☐ Area
(hectares)

☐ Unknown

☒ Not applicable (Please
provide additional
information)

E16A. Not applicable (Please provide additional information):

Our facility is located in a notified industrial area.

E17. Is the company supporting or implementing project(s) focused on ecosystem restoration and protection?

(Select one answer per line, if 'Yes', include the value)ⁱ

	No	No, but we plan to within the next 2 years	Yes	Project(s) area to date (hectares)
Forest ecosystem restoration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Other ecosystem restoration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Reforestation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Natural regeneration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Agroforestry	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Set-aside land	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Biodiversity offsetting	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Other (Please provide additional information)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	

E17A. (Optional) Please provide additional information:

E18. Where applicable, please report the company's emissions of the following pollutants within the reporting period.


(Select one answer per line, if 'Known', include the value) 

	Known	Unknown	Not applicable (Please provide additional information)	Emissions (t)
NOx	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	6.22
SOx	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	30.24
Volatile Organic Compounds (VOCs)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Hazardous air pollutants (HAPs)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Particulate matter (PM10)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	9.83
Persistent organic pollutants (POPs)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Other (Please provide additional information)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

E18A. Not applicable (Please provide additional information):

HAPs and POPs are not applicable.

E18A. (Optional) Please provide additional information:

E19. In metric tonnes, please report the company's total weight of waste generated within the reporting period. 

☐ Not applicable (Please provide additional information)

☒ **Waste generated (t)** ☐ Unknown ☐ provide additional information)

140.92

E19A. (Optional) Please provide additional information:

E20. Please report the company's hazardous waste as a percentage of total waste (e.g., hazardous waste ratio) generated within the reporting period.ⁱ

☒ **Hazardous waste ratio (%) - (Please input answer as a whole number (e.g., 95% = 95))** ☐ Unknown ☐ Not applicable (Please provide additional information)

98.72

E20A. (Optional) Please provide additional information:

23% of hazardous waste is currently recycled/reused.

E21. In metric tonnes, please report the company's estimated consumption of single-use plastic, wherever material along the value chain, within the reporting period.ⁱ

☐ Single-use plastics (t) ☐ Unknown ☒ **Not applicable (Please provide additional information)**

E21A. Not applicable (Please provide additional information):

We do not use single-use plastic.

E21A. (Optional) Please provide additional information:

E22. Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the environment principles, including any challenges faced and actions taken towards prevention and/or remediation. [i](#)

We will explore opportunity to improve our existing environmental and energy management systems.

Anti-Corruption

[Click for additional guidance](#)

AC1. Does the company have an anti-corruption compliance programme? [i](#)

- ☐ No, this is not a current priority
- ☐ No, but we plan to within the next two years
- ☒ Yes

AC1A. (Optional) Please provide additional information:

This is addressed through implementation of Code of Conduct and Supplier Code of Conduct.

AC1.1. If yes, in what year was this programme last reviewed? (YYYY) [i](#)

2023

AC1.1A. (Optional) Please provide additional information:

This is addressed through implementation of Code of Conduct and Supplier Code of Conduct.

AC2. Does the company have policies and recommendations for employee procedures in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials? ⓘ

- ☐ No, and we have no plans to develop any policy/recommendation
- ☐ No, but we plan to within the next two years
- ☒ **Yes, included within a broader policy or as a standalone policy**

AC2A. (Optional) Please provide a link, and/or provide additional information:

This is addressed through implementation of Code of Conduct and Supplier Code of Conduct.

AC2A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

AC2A. (Optional) Please upload supporting documentation if applicable (2/2):

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

AC3. Who receives training on anti-corruption and integrity?

(Select all that apply) 

- ☐ Select employees
- ☒ **All employees**
- ☒ **Contractors**
- ☒ **Direct suppliers**
- ☐ Indirect suppliers
- ☐ Other – such as partners, clients, etc.
- ☐ No training provided

AC3A. (Optional) Please provide additional information:

Training is imparted to employees/contractors on Code of Conduct and to suppliers on Supplier Code of Conduct.

AC3.1. How often is such training provided?

(Select one answer per line) 

	One time only	Every two or more years	Every year	Unknown
All employees	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Contractors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct suppliers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

AC3.1A. (Optional) Please provide additional information:

AC4. Does the company monitor its anti-corruption compliance programme?

(Select all that apply) 



Yes, through review on ad hoc basis



Yes, through internal employee self-evaluations



Yes, through automated controls monitoring



Yes, through external independent monitoring



Yes, through other mechanisms (Please provide additional information)



No, we do not monitor the anti-corruption compliance programme (Please provide additional information)

AC4A. (Optional) Please provide additional information:

AC5. Please report the company's total number and nature of incidents of corruption within the reporting period.

(Select one answer per line, if 'Known', include the value) [i](#)

	Known	Unknown	Choose not to disclose	Number of Incidents
Confirmed within the reporting period, but related to previous years	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<div>0</div>
Confirmed within the reporting period, and related to the reporting period	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<div>0</div>

AC5A. Please describe the nature of the incidents in the text box below:

No incidents of corruption reported in the reporting period.

AC6. Within the reporting period, what measures has the company taken to

address suspected incidents of corruption independently or in response to a dispute or investigation by a government regulator?

(Select all that apply) [i](#)

- ☐ Initial case assessment
- ☐ Internal investigation
- ☐ Review by risk/ethics committee
- ☐ Review by board of directors
- ☐ External audit/review
- ☐ Other (Please provide additional information)

☒ **Not applicable/no incidents in the reporting period**

AC6A. (Optional) Please provide additional information:

AC7. Does the company engage in collective action against corruption? [i](#)

- ☒ **No, this is not a current priority**
- ☐ No, but we plan to in the next two years
- ☐ Yes (Please provide additional information)

AC7A. (Optional) Please provide additional information:

This is under review at the board level.

AC8. Briefly describe additional relevant practical actions the company has taken within the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation. [i](#)

We will explore opportunity to improve our existing business code of conduct and supplier code of conduct and related processes continually to address anti-corruption effectively.

R5. (Optional) Please upload the sustainability report for your company

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R5.1. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R5.2. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

Thank you for completing the Communication on Progress.

Please do not close the page.