







# **Tata Chemicals** Communication on Progress (CoP) 2010-11

**UN Global Compact Report** 

# Principle 1: Business should support and respect the protection of internationally proclaimed human rights.

# Company's Policy & Direction



Specific actions taken during the current financial year

Outcomes with key Results & Measurements 1) Company follows Principles of the International Declaration of Human Rights. Its policies support, respect and protect the Human rights of its direct as well as indirect employees. The sustainability Policy addresses these aspects.

2)TCL has defined and documented policy on Social Accountability and is committed to comply with the requirements of the internationally recognized SA 8000 standard

3) The company has defined and documented policy for Community Development so as to ensure inclusive growth and sustainable development of its key communities. The key community defined by TCL includes the neighborhood of its manufacturing sites along with children, farmers and those who are socially and economically backward.

1) Company policies and guidelines ensure human rights compliance all across. Grievance Redressal Cell & Help Desk, on Company's intranet service, addresses issues related to its employees, resulting into higher satisfaction. Programs such as "Aawaz", help employees across levels to sit together to and resolve concerns and put forth improvement plans.

2) The company has established SA 8000 compliant management systems at all its 3 manufacturing sites in India

3) Programs that promote sustainable development include a focus on a) Natural resource management, b) Promotion of livelihoods & income generation, c)Improving the quality of life through health care initiative, education & skill building and improving the local infrastructure. Programs on efficient rural energy have also been initiated.

Over and above these, special interventions as affirmative action for the socially backward communities were also taken up under the four heads of employment, employability skills, entrepreneurship and education.

1) Overall Employee Engagement scores for the company have improved from 3.83(2009-10) to **4.08 (2010-11).** 

3) Achievement during the year 2010-11 area as follows:

3.1) Programs under Natural resource management include:

a) Water harvesting and water management for agriculture, household & drinking purpose: In all 6420 hectares of land has been treated by the construction of 2160 small structures like farm bunds, farm ponds, well recharge diversion channel, RRWHS etc., along with 224 medium structures benefiting around 1215 families.

b) Agriculture growth programs: Promotion of new improved cropping pattern through demonstration in 115 plots

c) Reclamation of saline/ sodic soils: 1220 acre of land has been reclaimed till now

d) Animal Husbandry promotion programs: 121891 has been vaccinated under the HS and FMD vaccination program

Pond management: 115 ponds have been scientifically treated

3.2 Programs for livelihood and income generation include:

a) Vocational Training / Skill development: 2607 have been trained in the trades of their interest.

b) Rural Entrepreneurship Development : 360 have started their own enterprise

c) Promotion of handicrafts through Okhai- 317 women have been employed under Okhai

d) 381SHG have been formed in Babrala and Mithpur.

3.3 Programs to improve quality of life include:

a) Swasthaangan Project (reproductive & child Health) covering 55 villages

b) Education programs supported through scholarships, adult education, informal education.

c) Infrastructure Development: includes construction of approach roads, sanitation blocks, improving facilities in rural schools etc.

**Principle 2:** Business should ensure that they are not complicit in human right abuses.



Specific actions taken during the current financial year



1) Company has Corporate Sustainability, SHE policy, Quality policy, Environment Policy, Community Development Policy, Food Safety Policy and Cardinal Rules of Safety.

2)Anti Sexual Harassment Policy

3) Tata Code of Conduct

(T-COC) ensure Human Rights compliance across the Organization

1) To monitor the compliance to the objectives of the policies, the company has established well-documented systems of record keeping, process of internal auditing, corrective and preventive action planning and reviewing the progress on regular basis. Third party surveillance audit validates this system and Management Committee reviews results of the third party audit

2) A sexual harassment (SH) redressal mechanism has been established which includes a redressal committee chaired by the senior most women employee. Most of the management cadre employee and employees that are in direct contact with employees such as HR, Personnel, security etc. have participated in gender sensitization workshops

3.1) In line with Tata group of attaining Leadership With Trust, all Tata group companies has institutionalized Tata Code of Conduct guiding clauses, which have been accepted and signed by all employees of the Company. All employees have been imparted training and awareness to thoroughly understand expected ethical behaviour. Company is also having T-CoC Grievance Redressal Mechanism and Ethics counselor to address the raised issues.

3.2) The senior team from TCE and TCM and TCNA have signed the TCoC declaration to abide by the Code.

1.1) Company's Fertilizer plant at Babrala has been awarded with Sword of Honour by British Safety Council consecutively for four times, where as the Chemical plant at Mithapur has been awarded with British Safety Council 5 Star rating for its Safety Management System. Babrala Plant has also been awarded with British Safety Council 5 Star rating for its Environmental Sustainability Management System three times in a row (2005-07). Haldia plant has also been awarded with 5 star rating by British Safety Council in environmental management in 2007 and Occupational Health & Safety System Management in 2011.

1.2) Company's all India locations are certified with ISO 9001, ISO 14001 and OHSAS 18001 and Mithapur site has implemented HACCP systems (Hazard Analysis Critical Control points for Bicarb plant.

1 .3) Through effective SHE Training and better implementation of safety practices the company's safety performance has improved significantly.

Year	Babrala	Haldia	Mithapur
2007-08	0.31	1.38	3.79
2008-09	0.00	0.99	1.66
2009-10	0.29	2.39	1.46
2010-11	0.45	1.44	1.10

Total Injury rate : per million man

2.1) Employees sensitized to the right of women to have a safe and secure work environment.

Action taken as appropriate where concerns were raised. There were three concerns raised during the year. Out of which two were identified not to be case of SH in nature. The people concerned were counseled and cases were closed. The one case where SH was made out is under recommendation and suitable action will be taken by the Management. Awareness and training sessions continued to ensure a safe and secure working environment

3.1) In the reporting period, all concerns raised were processed for proper closure. (For all the 25 Clauses of T-CoC)

(Refer actions under principle 10)

3.2) Commitment of the senior team in the subsidiary companies to abide by the TCoC.

# Principle 3:

Business shoulduphold the freedom of association and the effective recognition of the right tocollective bargaining LABOUR STANDARDS

Company's Policy & Direction

1) The company abides by the Indian Factory Act and all the Indian Labour Laws; these laws are in conformance to the ILO.

Company has recognized Trade unions and Staff unions for bargain able category of workmen and supervisory staff.

1.1) Company also constitutes various committees and councils having equal participation from management as well as elected workmen representatives to discuss and resolve various issues related to operations.

# Outcomes with key Results & Measurements

1.2) Company has periodic dialogues and negotiations with the recognized workmen and staff trade unions to discuss and settle the charter of demand amicably.

2) This is also a requirement under the SA 8000 standard to which TCL is committed.

1.1) Mithapur and Haldia plants have workmen as well as staff unions as per Trade Union Act –1926 and other relevant laws. At Fertilizer plant at Babrala, a single supervisory staff union represents all supervisor staff. Employees are free to join Trade Union of their choice. Every three years election process identifies one union, which is to be recognized by the company under the supervision of Government authority.

1.2) Joint committees like Joint Management Council and Canteen Management Committee with the representatives from Management and worker cadres are active to resolve the issues.

1.3) Company has Specific Executives and Personnel Department to deal with all matters related to Unions. All the decisions are discussed with Committees and with the Staff union prior to its implementation.

1.4) Clause 23 of T-CoC also ensures Freedom of Association. Company is having T-CoC Grievance Redressal System and Help Desk on company's intranet for resolution of individual grievances.

1.1) Company's chemical plant has 2 unions with 65% workers in Tata Chemicals skilled mazdoor sangh and 35% workers with Chemicals Kamdar sangh. Haldia plant has 1 recognized Trade Union for workers with 100% of employees as members. This union is registered as per "Section 4 of Trade Union Act – 1926".

1.2) At chemical plant there were 14 meetings of these two committees While fertilizer plant at Haldia had 12 meetings and Babrala had 4 meetings of CMC.

1.3) In the reporting period there were no unresolved grievances pending with the Grievance Redressal Cell

1.4) No concern was raised against clause 23 of TCoC in 2010-11

# Principle 4:

Business should support the elimination of all forms of forced and compulsory labour.

Company's Policy & Direction



 The company abides by the Indian Government laws under :• Abolition of Bonded Labor Act 1976• Contract Labor Abolition and Regulation Act – 1970

2) The company also ensures the adherence to relevant provisions of Indian Factory Act and Industrial Disputes Act.

# Specific actions taken during the current financial year





Outcomes with key Results & Measurements

Specific actions taken during the current financial year

Outcomes with key Results & Measurements

# Principle 5:

Business should support the effective abolition of child labor

# Company's Policy & Direction



Specific actions taken during the current financial year 1) The company's internal audit mechanism, periodic third party audit along with regular inspection by the government labor ministry authorities helps company to validate the adherence.

2) Company through its regular communication and periodic audit communicates and verifies the adherence of this stipulation from their suppliers, contractors and channel partners.

In the reporting period no violations or complaints have been reported.

1) Indian labor laws prevent recruitment of child labor at industrial premises. Company policies and Recruitment process are in alignment with labor laws as well as "ILO Convention 138" and ensures the compliance with all applicable laws

2) T-CoC and Relevant labor laws are applicable to local contractors, service providers, suppliers and channel partners as well.

1.1) Document of age proof as well medical examination by industrial physician is mandatory to ensure the compliance of stated rule.

1.2) The general condition of purchase contract and agreement stipulates the strict adherence to the compliance of all labor laws including nonengagement of child labor.

2.1) All supply contracts up and down the supply chain include a clause emphasizing on non-engagement of child labor, directly or indirectly. Company's vendor selection and registration and evaluation process ensures and verifies the adherence to the conditions of contract.

There is 100% compliance to the planned scheduled calendar for company's senior officer's contact meeting with channel partner, distributors, dealers, suppliers and contractors for communicating and reinforcing.

Outcomes with key Results & Measurements

### Principle 6:

Business should support the elimination of discrimination in respect of employment and occupation

Company's Policy & Direction



1) Company policy on hiring new employees emphasizes the aspects of "Equal Opportunity Employer" and complies with Clause - 4 of T-CoC.

2) Affirmative action is exercised in the case of physically challenged and socially and economically persons, who are preferred by the organization provided the candidate meets the company's competency requirements.

Specific actions taken during the current financial year

1) As per the company's recruitment policy, applicants are not discriminated on the basis of gender, race, caste, religion, social status or physical disability. During the year, the organization has employed female candidates on permanent as well as on training basis to show the commitment towards non-discrimination. The organization has also employed differently abled persons as per the required fit.

2) The Sexual - Harassment redressal committee proactively took up gender sensitization programs across locations, through presentations and films.

Outcomes with key Results & Measurements

During the reporting period (2010-11) 13 new female recruitments were done: these include 10 trainees and 3 lateral recruits. The current ratio is Male=3023: Female =143 (Trainee 10 & permanent 133): Total Strength: 3166

Total of 23 differently abled employees are giving service to the organization.70% management Cadre employees were covered under gender sensitization program. All new recruits inclusive of Management trainees undergo a half day gender sensitization workshop/ presentation

The gender sensitivity programs and awareness programs to ensure safe and secure work environment were held across the organization.

## Principle 7:

Business shouldsupport precautionary approach to Environmental Challenge

Company's Policy & Direction



# ENVIRONMENTAL PERFORMANCE:

1) Tata Chemicals has specifically set the directions through its Mission, Vision and Values and adopted a precautionary approach in establishing a systematic environment management system at all three manufacturing locations in the country. An e-enabled legal compliance management system directs and ensures compliance of all environmental laws and regulations. The EMS addresses the precautionary approach to all future environmental challenges and threats like Climate change, resource depletion and conservation of natural resources etc. through enterprise wise risk assessment and Sustainable development short term and long term strategies.

2) Corporate policy on Environment Health and Safety, Corporate Sustainability and Climate Change provides all direction to deploy best environmental practices which is leading towards conservation of resources and addressing future environmental challenges including climate change and other global environmental threats.

3) Enterprise wise process on Environment, Health and Safety management system has been established, which directs the common processes at all locations. The EPM process at functional level is aligned with corporate processes which are drawn to address all stake holder needs. 4. Strategy on Sustainability and Carbon footprint for 2011-2015 has been developed which directs all manufacturing sites to operate in a low carbon economy.

All locations have been certified to global standards like EMS ISO: 14001 (2004) and OHSAS: 18001 (2007) and ISO 9000-2008 standards. Babrala unit is also certified for Responsible Care -14001 (2008) standards. Certified internal assessors have been developed at each location to undertake effective internal audits and to ensure effective implementation of system. Findings of audits have been reviewed with Sr. management for improvements and for setting objectives and targets in EMS.

2) An e-enabled compliance management system driven by corporate ensures all legal compliance across the company under prevailing environmental laws in the country. During the year process of e-enabled compliance management system was completely reviewed for improvements.

3) A corporate risk management cell (Project Samruddhi) has been established at corporate level with an Internal audit cell at each location to assess implementation of risk & compliance management system. A corporate sustainability steering committee has also established at corporate level with sustainability champions at each locations to drive, monitor & measure environmental sustainability performance.

4.1) Targets have been set for key environmental performance indicators like Sp. Energy consumption, Sp. Water consumption and discharge, Sp. Chemical consumption, Sp. Emissions from stacks of Suphuric acid plant etc.

4.2) We have started monitoring our GHG emissions to implement various initiatives for managing climate change. Our corporate strategy has considered Climate Change as one of the major environmental challenge and has established a corporate strategy cell on climate change to respond to the challenge and to develop action for a low carbon economy. Management development programme on Climate change and sustainability has been developed during the year.

5) Company has strengthened its responsible care management practices for distribution and product stewardship & Security codes.

6) Corporate Green manufacturing Index has also been established considering critical environmental performance indicators on resource conservation and climate change.Each location has taken a target for reduction in emissions and conservation of natural resources.

1) Audits against each of the management systems have been conducted by certifying agency to ensure the effective implementation of management system. There was no non-conformance against any requirement under the standards. Opportunities for improvements have been identified during audits and action plans at each location has been developed for improvements.

Objectives and targets for reduction in resource conservation, emissions and discharges has been set, which has been reviewed by senior leaders during steering committee.

# Specific actions taken during the current financial year

Outcomes with key Results & Measurements 2) All compliance to the environmental monitoring schedule has been achieved. Compliance against all environmental statue's are met with and compliance reports have been submitted to the concerned authorities as per requirement.

E-enabled compliance management system supports communication of all compliances to the board. A compliance report under section 49 of the Company Act has been submitted.

e-enabled compliance management system provides effective implementation through escalation to higher levels in case time or event based compliance are not met timely.

3) Business strategies of environmental issues considering environmental challenges & threats has been developed through review by sustainability strategy committee & inputs from all sites.

Activity, process & service based hazards identification has been reviewed to make it more effective considering all business associated risks as per OHSAS-18001 -2007 standards.

All IMS documentations have been e-enabled and available through network. This resulted in paper reduction and availability of updated documents at all time.

4) Many awareness programmes on climate change and other global environmental issues have been conducted during the year.

Carbon footprint assessment for all three manufacturing sites has been completed.

Carbon foot print (Scope-1+2) in tCO2e.

At CNAB, our ongoing efforts on reduction of GHG emission and energy conservation has in-turn resulted in reduction of 11.6% our GHG emissions per ton of

Location	Mithapur	Babrala	Haldia
07-08	1791626	625221	85239
08-09	2004358	675961	68161
09-10	2077977	630005	57405
10-11	2092902	587433	50945

production from 2007-08 to 2010-11.

5) Tata Chemicals is a signatory to Responsible Care and provided support to ICC for training and awareness to industries across the country. Company's representatives have participated in training programmes, workshops and Seminars on Responsible care as Trainer and Faculties.

Babrala unit has been re-certified for Responsible Care – 14001-2008 management system

6) Green Manufacturing Index (GMI) has been reviewed in the corporate Executive committee and necessary actions have been taken for further improvements.

GMI for the last three years was:

2008-09	-	0.38
2009-10	-	2.34
2010-11	-	1.30

# Principle 8:

Business should undertake initiatives to promote greater environmental responsibility

# Company's Policy & Direction



Specific actions taken during the current financial year Company's mission, vision and policies are the principle guiding directives and help to promote greater environmental responsibility. Some initiatives which are of world class standards are driven from corporate level to promote and support greater environmental responsibilities and achieve higher environmental performance excellence at all manufacturing sites, and supply chain management.

Tata Code of Conduct directs to comply all environmental legal requirement and resource conservation while Corporate policy on "Sustainability, Responsible care and Safety Health and Environment" provide guidance on environmental performance excellence.

Company is active member of TERI-CORE corporate roundtable for environment in India which is associated with World Business Council of Sustainable Development.

Company Is signatory to Indian Chemical Council's Responsible Care initiative and to Confederation of Indian Industries on "Mission on Sustainable growth".

Tata Chemicals believes in life cycle approach which directs business to consider responsibility on environmental protection from raw material procurement to product use.

1) Company is having well established Environment Management System as per ISO 14001-2004 and Responsible Care 14001-2008 standard.

2) Tata Chemicals is a signatory to Responsible Care and provided support to ICC for training and awareness to industries across the country.

Babrala site has established a certified RC-14001 management system which provides a structured and focused approach on Green supply chain management to prevent environmental & safety aspect of logistics and a life cycle approach on product stewardship.

2.2) Company has improved its performance for the codes of Responsible care by strengthening its management practices.

3) Tata Chemicals has adopted the world class guidelines on Occupational Health, Safety and Environment Management guidelines of British Safety Council, UK. Tata chemicals has started working on Dupont Process Safety guidelines.

4) The company is responsible for "Corporate Responsibility for Environment Protection" (CREP) and thus the company submits compliance reports for the action plans that were committed under volunteer standards.

5) The company institutionalized number of initiatives like Green Manufacturing Index, Responsible Care and sustainability reporting as per GRI guidelines through Corporate Sustainability Report.

6) The company has established strong communication mechanism to create awareness and communication on safety health and environment performance among its stakeholders.

8) Objectives and targets are set in the beginning of the year to conserve natural resources and reduce pollution loads. At source treatment, recycle and reuse philosophy is adopted to conserve and minimize the resource consumption. 9) The company has institutionalized environment & species conservation effort through its flagship project " Dharti Ko Arpan". It has allocated Rs.1 Crore a year for environment conservation/ improvement projects.

The projects include: Save the Whale Shark Campaign, Asiatic Lion Conservation project, Bio-diversity Reserve, Establishment of rural Eco-clubs, Greening and Mangroves for Future program.

1) Audits by the external agency were conducted twice in a year and all locations have been re-certified for ISO 14001-2004 while Babrala site was also recertified for RC 14001.

2) Company's representatives have participated in training programmes, workshops and Seminars on Responsible care as Trainer and Faculties. Company has been awarded use of Responsible Care logo. Company has also been awarded "Corporate SHE award "by Indian Chemical Council

2.1) Under Distribution and Product Stewardship codes of practices, Training and awareness programmes have been conducted for Distributors, Dealers, Retailers and Customers. Environment Impact of product distribution and use under project "Green Supply chain" has been initiated. Center for Agri solution and Technology has been established for Crop Nutrition business, which provides solutions and recommendations for optimum fertilizers to control the excessive fertilizer application to avoid soil pollution.

Suppliers, Dealers and Retailers meet organized for all sites to communicate about Responsible Care and to adopt best SHE practices in their processes and practices.

2.2) Implementation of RC has been assessed to achieve practice at place for all codes of practices at all sites to measure the score s under each code. The steering committee reviews the RC performance twice in a year. The average TCL scores of six codes of practices for last 03 years were:

2007-08 -	80.4%
2008-09 -	86.7%
2009-10 -	88.1%
2010-11 -	90.6%

We have also started working on recently introduced 7th code of RC "Security"

3) Haldia unit has been rated 5 Star for occupational health & safety management system by British Safety Council during 2010-11.

Dupont Process Safety Audit for Ammonia Handling & Storage has been carried out by Dupont at Haldia

4) Annual progress reports on CREP implementations at all sites are submitted to the nodal agencies.

5) Corporate Sustainability Report for 2008-10 based on GRI-G3 guidelines has been published on its website www.tatachemicals.com

6) Awareness program for suppliers, dealers and customers have been conducted to consider all EHS aspects intheir processes and practices.

Suppliers and other Vendor selection process include their SHE performance and practices.

# Outcomes with key Results & Measurements

Key communities were invited to the manufacturing plants to show company's focus on safe operations and readiness on emergency preparedness.

7) Community awareness on EHS aspects and their participation during emergency situation were conducted.

8) Though urea-manufacturing process wholly depends on ground water, specific energy & water consumption of Babrala plant is a benchmark amongst the Nitrogenous Fertilizers' manufacturers. Babrala and Haldia Fertilizer sections are zero discharge plants and mainly depend on recycled water Mithapur has achieved 0% dependence on ground water in the last 5 years by adopting various in-house water conservation measures as well as management of the rain-fed lake

Company's sulphuric acid plants (SAP-1&2) at Haldia are one of the lowest SO2 emitters in the country [emission from SAP-1 is 0.44 and SAP-2 is 0.47 kg/MT of 100% H2SO4] Fertilizer (DAP, NPK, SSP) section at Haldia is complete internal recycling plant in terms of water with zero discharge of effluent.

8.1) Operating in harsh ecological conditions/semi-arid conditions at Mithapur site, highly alkaline soil conditions at Babrala site, TCL has restored the ecological balance in the surroundings habitats by converting waste lands into greenbelt. Our commitment towards continual improvement is triggering new programs such as bio-diversity reserves, grassland development, Mangrove conservation and regeneration, increasing waste utilization and greening of our products 50,000 mangroves seedling have been planted at the Rukshmani creek site in Dwarka, Gujarat. Reclamation of alkaline soils using specially developed "Mychorihizal technology" was awarded the best Indian innovation award by ICIS-UK award.

8.2) Fly ash generated in power plant as waste and high salts in effluents is also used in Cement manufacturing.

9) A total of 281 whale sharks have been rescued till date as a result of the "save the whale shark campaign".

1064 (Phase-I = 1002 wells + Phase II = 62 wells) open wells in the Gir sanctuary have been barricaded so as to protect the Asiatic lions and their cubs from falling into the open wells, which could lead to their death or injury.

50,000 mangroves seedlings have been planted at the Rukshmani creek site

"Grow Trees", a Mumbai based organization has shown interest in supporting the mangrove plantation program. TCL has also promoted eco-clubs in the rural schools and 29 such clubs promoting understanding and awareness about environment and ecology have been formed both in Mithapur and Haldia.

# Principle 9;

Business should encourage the development and diffusion of environmentally friendly technology

Company's Policy & Direction



Specific actions taken during the current financial year As a commitment to continuous improvement of the environmental performance, it is company's objective to minimize the quantity of waste generation & energy consumption from the processes by installing ecofriendly technology, or by increasing the use of renewable source of energy.

Company will develop and use eco-friendly technology for safe production,

transportation use and disposal of products. Company shall extend knowledge by conducting or supporting research on the Health, safety and Environmental effects of our products, processes and waste materials Company is committed to work with others to resolve problems created by past handling and disposal of hazardous substances Tata Chemicals has set up a R&D centre at PUNE and a "Centre for Agriculture Technology" at Aligarh (UP) to develop new technologies for innovating environmentally

1) Company uses Solar energy at its salt works. To conserve natural non renewable resources.

2) Effluent Solid Filtration Plant at the chemical unit is installed to recover the solids from the Soda ash Effluent generated and to use the solids in Cement manufacturing.

In the area of waste water recycling and reuse, we have pioneered recycling of waters by integrating various manufacturing operations; recycle of condensate as boiler feed water at Mithapur, using treated effluent containing nutrients for horticulture at Babrala and the use of regeneration streams in scrubbers at Haldia.

3) Conservation of non-renewable natural resources through replacing them by renewable resources as fuel and source of power has been considered.

4) Production of fuel from renewable resources has been initiated to contribute in conservation of non-renewable natural resources.

5) Green Chemistry principles to address the environmental issues

6) Innovation centre has been established, which is working on developing new green/nano-technologies.

Technological renovation is considered for improving the environmental performance by reducing waste generations.

7) Knowledge management system has been implemented at all sites, which taps all innovative ideas to improve the organization environmental performance.

8) Suggestion scheme is established at all locations to capture the innovative ideas of employees.

Outcomes with key Results & Measurements 1) While producing close to 2.091 million tonnes of solar salt from salt works Mithapur, in the year 20010-11, the company utilized renewable solar energy to evaporate 104.560 million Kilo Liters of sea water. Thus utilized solar energy equivalent to 209121950 GJ.

During the year renewable energy (wind energy and solar energy) generated – 1541771 kwhr at Mithapur site.

2) Solids (recovered form ESF plant) used for Cement manufacturing in the year 2010-11 was 45580 tonnes.

About 48% of water is recycled back into the system.

3) Fuel oil has been replaced by coal and bio-mass (Rice husk or straw) as fuel for hot air generator for DAP-1 plant and step-by step increasing the biomass quantity at Haldia to reduce GHG emissions.

4) A Bio-diesel and Bio-ethanol manufacturing plant has been set-up.

5) Increased waste recycling reduced specific raw material consumptions and shifting towards eco-friendly processes etc.

6) One innovative project of utilization of flue gas from power plant to neutralize the effluent has been implemented at Babrala and in continuous use to conserve acid used for neutralization.

7) Quarterly K-Café were conducted on Energy saving, Safety & Security Strengthening, Water Conservation and Climate Change Mitigation.

Annual K-Fair also organized to showcase the learning of KM.

8) e-enabled suggestion scheme called 'Prerna' has been established to make it more robust.

# Principle 10:

Business should work against corruption in all its forms, including extortion and bribery

Company's Policy & Direction

ANTI CORRUPTION AND PREVENTION OF BRIBERY

Tata Code of conduct has been established in the company, which defines commitment on ethical behaviour. As per Clause 5 and 6 of Tata Code of Conduct, the organization is committed towards anti corruption and prevention of bribery.

Tata Code of Conduct has been revised during the year to include some new requirements like sustainability and climate change etc.

Specific actions taken during the current financial year 1) Tata Chemicals has an elaborate system and processes on the' management of business ethics' and all employees sign the Tata Code of Conduct. The company has a Chief Ethics Counselor located at Corporate office Each SBU has an Ethics Counselor.

Tata Code of conduct provides an opportunity to all employees / stake holders to communicate any unethical act of any employee to concern ethics counselor.

The Tata Code of Conduct is sent to all suppliers with the contract, for their perusal in respect of relevant clauses.

Awareness programmes are conducted on Tata Code of Conduct for all employees across the locations and corporate and marketing offices.

# Outcomes with key Results & Measurements

Statistics of the concerns for the year 2010-11 against Tata Code of Conduct is as follows:

Total concerns raised in 10-11 : 26

Code wise classification:

- 1. Clause 4 (Equal opportunity) 02
- 2. Clause 9 (Quality of Products) -01
- 3. Clause 17 (Ethical Conduct) 22
- 4. Clause 24 (Data Integrity) 01

All concerns were considered for appropriate process as per procedures for closure with actions on each as per the decision of ethics committee.

for more information, visit -

www.tcsrd.org www.okhai.org

our GRI Report - http://tatachemicals.com/Sustainability/downloads/TCL\_SUSTAINIBILITY\_REPORT.pdf

HE MAN TOURISHAY	
Community Development P	olicy
Tata Chemicals pledges itself to care for and serve the c	community by:
<ul> <li>Designing, evolving and implementing sustainable, and scaleable development models, that leads to m socio-economic development of the communit ecological development in its area of influen</li> </ul>	easurable ty and
<ul> <li>Involving the community in all stages of the p in the true spirit of participatory developme</li> </ul>	
• Having focused and transparent processes, that J for equal opportunity, while improving the quality	
<ul> <li>Partnering and networking with government, dev agencies, corporate bodies and NGOs to imple appropriate community development program</li> </ul>	ement
<ul> <li>Creating knowledge resource centers to transfer a information and help build capacities of partners and the</li> </ul>	
• Involving the employees in volunteering for con Development programs.	nmunity
	- aproved-
Date: 21" May 2009	Managing Director





# **TATA** CHEMICALS LIMITED



# DECLARATION UNDER TATA CODE OF CONDUCT

#### National interest

A Tata Company shall not undertake any project or activity to the detriment of the interest of the communities in which it operates. A Tata company's management practices and business conduct shall be in accordance with the laws of the land. It shall conform to trade procedures, including licensing, documentation and other necessary formalities, as applicable.

#### Financial reporting and records

A Tata Company shall maintain fair and accurate accounts, have internal controls, provide accessibility of required information to authorised parties and government agencies. There shall be no willful omissions from the books and records or willful misrepresentation of financial information. No employee shall make, authorize, collude in an improper payment, unlawful commission or bribing.

#### Competition

A Tata Company shall not engage in activities of unfair or restrictive trade practices. It shall market company products and services on their own merits, not make misleading statements about competitor's products / services in the market. Any collection of competitive information shall be made only in the normal course of business and through legally permitted sources and means.

#### Equal opportunities employer

A Tata Company is committed to equal opportunities to all employees and qualified applicants for employment; treating employees with dignity while maintaining a work environment free of all forms of harassment. HR Policies shall promote merit-based decisions, diversity and equity in the workplace while complying with Cooperation by sharing of physical, human & management labour laws and international best practices including respect for the resources, ensuring that this does not adversely affect its business right to privacy and the right to be heard.

#### Gifts and donations

A Tata Company and its employees shall not receive or offer to make any illegal payments, remunerations, gifts, donations or comparable benefits with an intention to obtain business or uncompetitive favours and shall strive to eliminate all such forms of bribery, fraud and corruption. However nominal gifts may be accpeted/given under full disclosure.

#### Government agencies

Neither the Company nor its employees shall offer or give funds or property as donation to the Government with an intention of obtaining favourable performance of official duties. It shall ensure compliance with regulations and transparency in all its dealings.

Name:

Signature:

#### Political non-alignment

A Tata Company shall not support nor donate company funds or property to any political party, candidate or campaign.

#### Health, safety and environment

The company shall be committed to provide safe, healthy, clean and ergonomic work environment. It shall prevent wasteful use of natural resources and be committed to improving the environment. It shall endeavour to offset the effect of climate change in all spheres of its activities. A Tata company shall strive for Economic, Social and Environmental stability.

#### Quality of products and services

A Tata Company shall commit to supply good and services meeting the required National and international standards, efficient aftersales service consistent with customers' requirements to ensure their total satisfaction. It shall illustrate adequate labels, caveats and other necessary health and safety information on its Product packaging.

#### Corporate citizenship

The Company ensures compliance with relevant laws and regulations; active assistance in improvement of quality of life of communities it operates in; and incorporates these activities in its Business Plan. Tata companies encourage volunteering by its employees in collaboration with community groups. They conduct management reviews to set strategic direction for social development activity.

#### Co-operation of Tata companies

interests and shareholder value; preference to a market-competitive Tata company in procurement of products and services.

#### Public representation of the company and the Group

The Tata Company or the Tata Group in all public appearances shall be represented only by those directors and employees, who are authorized to disclose information on the Company / Group.

#### Third partyrepresentation

Parties having business dealings with the Tata Group, but which are not members of the Group (such as consultants, agents, sales representatives, distributors, channel partners, contractors and suppliers) are not authorised to represent a Tata company without the written permission if their conduct & ethics are inconsistent with the Code. Third parties are expected to abide by this Code in their

Date:

interaction with, and on behalf of the Company. Tata companies are Conflict of interest encouraged to sign a non-disclosure agreement with third parties to A Tata employee shall not engage in any activity, which might support confidentiality of information.

#### Use of Tata brand

The use of the Tata name and trademark shall be governed by manuals, codes and agreements to be issued by Tata Sons. The use of the brand is defined and regulated by the Tata BE-BP Agreement. Third party shall not use the Tata brand to further its interests.

#### Group policies

A Tata Company shall recommend to its Board of Directors the adoption of policies and guidelines periodically formulated by Tata Sons.

#### Shareholders

The company shall comply with all regulations and laws governing shareholders' rights, including disclosure of relevant information in accordance with regulations and agreements.

#### Ethical conduct

Every employee (including full-time directors and chief executive) shall be responsible for the implementation of the Code. He / She shall deal on behalf of the company with professionalism, honesty and integrity, while conforming to high moral and ethical standards, fair and transparent conduct. Employees shall preserve Human Rights of every individual and the community and strive to honour commitments.

#### Regulatory compliance

Every employee of a Tata company shall comply with applicable laws and regulations in his / her business conduct. If the standards of the applicable laws and regulations are below that of the CoC, then the standards of CoC shall prevail.

Directors of a Tata company shall comply with applicable laws and regulations of all the relevant regulatory and other authorities and shall safeguard the confidentiality of all information received by them by virtue of their position.

#### Concurrent employment

A Tata employee shall not, without the requisite, officially written approval of the company, accept employment or a position of responsibility with any other company, nor provide freelance services to anyone, with or without remuneration.

conflict with the interest of his company or the Group. If such activities or relationships do exist due to historical reasons, a complete disclosure to that effect must be made with respect to the employee and his / her immediate family. A employee, including executive directors shall not accept position of responsibility in any non-Tata Company or not-a-profit organisation without specific sanction.

#### Securities transactions and confidential information

A Tata employee shall not derive any benefit or assist others to derive any benefit, from access to and possession of information about the company or Group or its clients or suppliers that is not in the public domain. He/She shall not use or proliferate "Insider information" for making or giving advice on investment decision about the shares of the respective Tata company. Employee shall respect and observe confidentiality of of information pertaining to other companies.

#### Protecting company assets

The assets of the Company(both tangible and intangible), including intellectual property rights and proprietary information shall be employed primarily and judiciously for the purpose of conducting the business for which they are duly authorised.

#### Citizenship

The involvement of a Tata employee in civic or public affairs shall be with express approval from the chief executive of his / her company, subject to this involvement having no adverse impact on the business affairs of the company or the Tata Group.

#### Integrity of data furnished

Every employee shall ensure, at all times integrity of data or information furnished by him / her to the company. He/she shall be entirely responsible in ensuring that the confidentiality of all data is retained.

#### Reporting concerns

Actual or possible violations of the Code or an event of misconduct, act of misdemeanour or act not in the company's interest must be promptly reported to the management. Employees can make protected disclosure under the Whistle Blower Policy. The company shall ensure protection to the whistleblower and any attempts to intimidate him / her would be treated as a violation of the Code.

## **DECLARATION BY EMPLOYEE**

ave read and understood the Lata Code of Conduct and agree to abide by all its provisions both in letter and spirit.	
Name:	Emp. No.:
Signature:	Date:
Location:	



# Registered Office

Bombay House 24 Homi Mody Street Fort Mumbai - 400 001, Tel: 91-22-66658282

Web-sites: www.tata.com | www.tatachemicals.com | www.humantouchofchemistry.com www.tcsrd.org | www.okhai.org | www.tataswach.com | www.tatasalt.com www.ishaktidals.com | www.tatakisansansar.com | www.rallis.co.in

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