

Corporate Social Responsibility and Global Compact in India: A Review

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In the era of post LPG, Corporate Social Responsibility is considered as a pertinent tool to leverage the power of the business world to achieve sustainable development. With rapid growth in transportation, telecommunication and information technology sectors, development has been many folds, but not a sustainable one. Critical problems like climate change, widening gap between the north and south block, relentless exploitation of natural resources, needs to be addressed to achieve sustainable development. In this light, in his address to the World Economic Forum in Davos in Switzerland on 31st January 1999, the former Secretary General of the United Nations Organisation, Kofi Annan called on business leaders to join an International Initiative 'The Global Compact'. The programme, is expected to bring companies together with the United Nation's agencies, labour and civil society, to support Universal environmental and social principles. Its operational phase was launched on 26th July 2000 at United Nations Head Quarters in New York, since then companies, international labour and civil society organisations from all regions of the World are engaged in advancing environmental and social principles.

Methodology:

The Secondary data has been collected from various sources like Communication on Progress (COP) from UN Global Compact website, annual reports, government publications, journals, reports and books. A sample of nine companies has been selected for a detailed review on the issues of Human Rights, Labour Standards, Environment and Anti-Corruption. The history of reporting on four issues over the period of

four years (from 2004 to 2008) is studied. The communication on progress, in the light of ten principles, of these companies has been accessed from the UN Global Compact website.

Global Compact in India:

In India, the Global Compact was launched at a meeting of Business Leaders in Mumbai on 4th December, 2000. By the end of December 2007, one hundred and seventeen public and private sector companies, institutions and business associations have joined the initiative. According to Blair (2004) not enough US companies are participating, the situation is the same in India. Table 1 gives year-wise number of companies that have associated with the Global Compact Programme (GCP).

Table : 1-Year wise number of companies associated with GCP

Year	2000	2001	2002	2003	2004	2005	2006	2007
No. of Companies	2	17	12	12	5	10	21	38

Of the 117, some are listed and others are not, small and medium size enterprises (SMEs), Local NGOs, CSR organizations, a city, Academic Institutions and Business Associations. Table 2 gives the details.

Table : 2 - Signatories to Global Compact Programme

S.No.	1	2	3	4	5	6	7	Total
Type	Company	SMEs	NGOs	CSR Orgs.	City	Academic Institutions	Local Business Associations	
Number	67	33	7	1	1	4	4	117

Of the sixty seven companies, thirty five are listed on Bombay Stock Exchange and/or National Stock Exchange. Among these listed companies, twelve are either not communicating on Progress or/and Inactive participants. Nine of these twenty three companies constitute the final sample. The details of the selected nine companies are provided in Annexure-1. The sectors to which these belong include Chemicals, Construction & Engineering, Oil & Gas, Textile, Apparel

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& Luxury Goods and Utilities. The companies associated with Global Compact are expected to provide regular reports annually in the form of Communication on Progress. A Communication on Progress (COP) describes and assesses implementation activities in greater depth and in a more formal way.

Profiles of selected companies:

This section deals with the profiles of the final sample of nine companies which have been reporting to the United Nations Global Compact Programme about their policies, action taken and outcome of the initiatives; related to Human Rights, Labour Standards, Environmental and Anti-corruption issues.

ACC:

ACC is associated with GCP from 14th September, 2004 and its profile is based on Communication on Progress provided for the years 2006-07 and 2007-08.

Human Rights:

- It respects the Universal Declaration of Human Rights and is in the process of developing and adopting a policy to support it.
- It respects the rights of citizens as per the laws of the land and aims to improve the Human Development Index.
- It declares that it deals fairly with its stakeholders and is trying to build a better and sustainable way of life for the weaker section of the society.
- In the year 2007, it has adopted workplace policy for HIV/AIDS affected employees.
- It is engaged in community work and upliftment of the underprivileged people in society, especially in the rural areas, in and around its manufacturing plants.

Labour Standards:

- It respects the workers' right to collective bargaining and encourages dialogue with unions

and associations pertaining to work, facilities and benefits and the charter of demand is amicably settled.

- It abides by the Indian Government laws like abolition of Bonded Labour Act 1976.
- Its' policy is in alignment with 'ILO Convention' and is an 'Equal Opportunity Employer'.

Environment:

- Its corporate objective is to be committed to environment; has an environment management system, in conformity with the state and central government rules and regulations.

- Its objective is to use eco-friendly technology and would like to increase its use. It is ISO 14001 certified.

Action: It has been using pollution control equipment much before it became mandatory. Surveillance audit is undertaken and Annual environmental statements are submitted to Government. Vigilant environmental engineers, ensure good environment management practices. Advanced technology is deployed in all its operations. It uses alternate fuels and takes up tree plantation activity; waste products like slag and fly-ash are being used in cement making. Water management is undertaken and encouraged both in the company and communities around. Focus has been on use of alternate fuel and raw material, waste management services and environmental issues.

Anti-Corruption:

Transparency in all facets of the operations is maintained and highest priority is given to ethical behaviour. In case of corruption, dishonesty or unethical behaviour is dealt expeditiously. In 2007, it introduced a policy which outlined code of practice for procurement of material.

Balmer Lawrie & Co. Ltd.,:

It has been associated with GCP since 29th May,

2002 and the Corporate HR Development & Communications Department is in-charge. It has submitted COP for the years 2004-05, 2005-06 and 2007-08.

Human Rights:

It states that it upholds and improves human rights aspects within and with its partners and ensures that it is not complicit with any of the abuses related to human rights.

Action: A committee is set up to ensure that there is no sexual harassment at work place; it intends to provide a positive workplace. It is principled in terms that it deals with those parties which have a good history with respect to human rights. Its focus is on developing the society at large by organizing programmes to create awareness about HIV/AIDS. In the year 2005-06, as a policy it has decided to earmark 0.5% of its net profits to fulfill its corporate social responsibilities.

Labour Standards:

It states that it believes and supports the employees' right to association. The terms and conditions are settled through the process of collective bargaining. It states that no form of forced or bonded labour is allowed. According to its policy, individuals above the age of 18 are only employed and the contractors are also made to follow this policy. It states that it does not practice any form of discrimination and advances the cause of meritocracy. A positive discrimination with respect to individuals who are socially backward or underprivileged like SC/ST/OBC and physically challenged are given preference to abide by the norms of the Government.

Environment:

With a highest priority to protect the environment, it has taken initiatives to treat and discharge effluents in all its plants according to the standards set by authorities. In the year 2007-08 it ensured that the

effluents discharged do not harm the flora and fauna as well as replaced furnace oil so as to control the gaseous discharge and ensure that the air is cleaner. In the light of the climate change it states that initiatives to reduce power consumption and waste generation have been taken up in all the plants. Its initiatives have fructified, some of its plants are ISO 14001 and OHSAS certified too, while others are in pipeline. It has its R&D team which works to minimize its ecological footprint. It states that during the year 2005-06, it has patented an environmental friendly process called 'non-acid base used oil refining'.

Anti-Corruption:

Transparent policies and systems are expected to ensure ethical behaviour by the employees. Views and suggestions are sort from the customers and associates. Cases of corruption and dishonesty are dealt seriously, with the aid of a vigilance department. To increase the transparency, tenders of Rs. Five lakh or more are hosted on the website.

Bharat Heavy Electrical Corporation Ltd:

It is associated from 10th September 2001 and has communicated during the last years 2004-05 to 2007-08. Its COP for the year 2005-06 had been considered as a notable one

Human Rights:

It states that its policies have been drafted and followed keeping the principles of human rights, Constitution of India, labour laws and declares that there has been no instance of human rights abuse in the past. It does not mention in the communication on progress about the action taken during the years and progress achieved on this front.

Labour Standards:

With respect to the labour standards it adheres to the laws of land and ensures that the interests of workers are protected. It does not employ forced and compulsory labour. As a policy, the minimum age

for employment is 18 years. It has 'The Personnel Policy' which is applicable to all employees.

Action: It has many bi-partite for workers, where problems are discussed and amicably settled. Apex level bipartite forum is constituted by workers (representatives of all units and members of the unions) and management (represented by Chairman and functional directors).

Environment:

It has HSE policy in place and all its units are ISO 14000 and OHSAS-18000 certified.

Action: With respect to water conservation, water harvesting systems are installed in all its plants and township. To improve the greenery around it has planted three million saplings, the local population was also involved in this initiative. It states that initiatives are taken to conserve natural resources, generation of energy from waste and efficient water management. There is no mention about the specific outcomes of these initiatives. As part of its initiative to develop environmentally friendly technologies, during the year 2007-08; it was involved in the development of Integrated Gasification Combined Cycle (IGCC) technology, to usher in clean coal technology. It has set up Asia's first IGCC power plant (6.2 MW) with an indigenously designed pressurized fluidized bed gasifier. Efforts are underway to upgrade it to 125 MW. With a concern for the environment it has been contributing to the national effort by developing and promoting renewable energy based products like solar –heating systems, lanterns and battery powered vehicles on a sustained basis.

Outcome: To its credit it has India's largest Solar-Diesel Hybrid Power Plant (50 KWp capacity), facilitating availability of un-interrupted & environment friendly power for various applications; Six 'Stand-Alone' Solar Photovoltaic (SPV) power plants of 3X110 KWp & 3X55 KWp; commissioned 150 sets of solar

powered water pumping systems in Northern India, for Irrigation purpose and 57 sets Solar PV powered systems (5.94 kWp each) for dispensing petrol at retail outlets. In its COP 2007-08, it states that it is also engaged in research in areas like fuel cells for distributed environment friendly power generations.

During the year 2007-08 it has adopted CSR policy with a focus on Self-Employment Generation, Environment Protection, Community Development, Education, Health Management & Medical Aid, Orphanages & Old Age Homes, Infrastructure development and Disaster/Calamity Management and has planned to earmark 0.1% of profit after tax to these issues.

Anti-Corruption:

Action: In its COP 2007-08, it states that:

It has taken a lead role in implementing all provisions of "Right to Information Act" both in letter and spirit. Its main objective is to curb corruption by focusing more on the preventive and educative aspects, rather than investigative /punitive, to achieve this it conducts training programmes, seminars/conferences and arranges regular interactions of employees with Chief vigilance Officer. Transparency measures like payment through electronic mode. Vendor status, purchase orders and contracts concluded, bill payment status and tenders are hosted on its website.

It is in the process of signing the 'Integrity Pact' as developed by Transparency International.

Bongaigaon Refinery and Petrochemicals Ltd.,:

It has been associated with UNGCP from 7th November 2001 and its profile is based on the communication on progress for the years 2006-07 and 2007-08.

Human Rights:

It states that it respects internationally proclaimed human rights and the Constitution of India and that its personnel policies are based on the rules

of the land. It believes in the philosophy of equal opportunity with a positive affirmation to women, PWD and ST and SCs. It states that it is concerned with stakeholders and works towards resolutions of their concerns. It states that it condemns human right abuses in all forms and manner.

Action: It has set up a cell for Women and Scheduled Tribes / Scheduled Caste (ST/SC), as per Government of India guidelines. It expects its supply chain partners to follow human right principles and incorporates them as conditions of contract. It monitors their compliance with a emphasis on minimum wages, working hours and contribution for the contractor's staff to social security schemes like provident fund & ESIC schemes.

Labour Standards:

It declared that it does not employ forced and compulsory labour, child labour and is an equal opportunity company. It states that the employees have the right to join any association but doesn't mention about the collective bargaining option.

Action: It ensures that all its contractors under its operational control follow the norms related to the various acts of the land.

Environment :

Its mission statement 'To preserve ecological balance and thereby ensure sustainable development through strong environment principles' reflects its orientation towards environment. It has its HSE standards set to reduce related risks and requires its contractors to follow the standards. HSE management systems and other standards like OISD. It is ISO:14001, ISO 9000:2000 and OHSAS 18000 certified.

Outcomes:

It has been able to reduce fuel consumption and fresh water consumption. Its' emission levels are below the prescribed national limits and is

implementing environmentally friendly technologies.

NTPC Limited:

introduction: It is associated from 6th July 2001 and in the last four years (2004-05 to 2007-08) it has provided COP consistently.

Human Rights:

Its resettlement and rehabilitation (R&R) policy has been strengthened and a new CSR-Community Development policy has been developed in July 2004. Its focus is on community development in the neighbouring villages. It has allocated Rs.69 million (2004-05) for community and peripheral development. Its contribution to natural calamities was Rs.880 million along with a contribution of Rs.15.2 million by the employees. In the year 2005-06 it has allocated Rs. 54 million. In the year 2006-07 the contribution had been Rs.62.049 million and participated in Global Compact Leader Summit. In year 2007-08 an amount of Rs. 81.137 million was allocated for community development programme. It was associated with Bureau of Indian Standards (BIS) and contributed in preparation of the draft proposal of ISO 26000 and ISO:16001:2007. It has been OHSAS18001, ISO 140001 and SA 8000 certified.

Labour Standards:

It states that to address the issues of labour standard in a comprehensive manner, has decided to adopt international standards like SA-8000 and OHSAS-18001. It is in the process of getting SA-8000 accreditation to all its twenty operating stations.

Observation: There is no mention about the standards taken with respect to freedom of association and collective bargaining. There is no mention about anti-corruption policy, though they have a vigilance department.

Environment:

Its commitment to environment is reflected in getting all its twenty projects accredited by ISO-14001.

Oil and Natural Gas Corporation Ltd:

It is associated since 17th September 2003 and has been providing COP for the last two years only. It has a corporate citizenship policy. The commitment of the company towards UN GCP is expressed by the Chairman and Managing Director.

Human Rights:

It has a policy to protect employees from aboriginal tribes. It gives preference to persons with disability for employment purpose. It takes a stand and declares that it is not at all complicit in Human Rights abuses. Among the selected sample companies, this is the only company which takes a stand that it is not complicit with respect to Human Rights. It has a policy to deal with sexual harassment at workplace and guidelines on "code of ethics at the workplace".

Action: It conducts HIV/AIDS awareness programmes for both the internal and external stakeholders. It has sensitized about three thousand people on this issue. It has supported other seminars and conferences on the subject. It has women development forum in place.

Labour Standards:

It declares that it recognizes generously the workers' unions, officers' associations, Mahila Samities and Officers Clubs. It declares that it does not use any form of forced/compulsory labour, child labour internally and is making it mandatory to all its associations with various stakeholders. It pursues the policy and practice of bipartite negotiations. Collective bargaining is practiced at three levels: Asset/Basin, Regional and Corporate. It supports organizations which are engaged in spreading the awareness about the issues of forced and child labour. It employs people from local community.

Result: There has been no major dispute during the year 2006-07 and no loss of work days, this reflects that issues are settled amicably.

Environment:

Its environmental management system is based on principle of precautionary with a stress on the planet's ecological credit. It is concerned about climate change. It is concerned about wasting energy resources and impact of emissions from flaring. It is working hard to achieve zero flaring. It uses renewable energy like solar power.

Action: Its green house gases emission level are calculated but are not reported in its COP reports. It is aiming to reduce its emissions. It is planning to have Green Buildings in Delhi, Mumbai, Kolkatta and Dehradun. As part of water management, it monitors water consumption through out its activities and environment impact assessment is carried out. It is planning to leverage its enormous knowledge base about geology of all basins of the country, to ameliorate water scarcity in acid regions. With a focus to maintain the biodiversity, it is expanding green cover by annual tree plantation programme with an aim to green the barren hills. It has taken initiatives to conserve mangroves and coastal areas in collaboration with Bombay Natural History Society. Its initiative in clean development mechanism (CDM) has resulted in four registered projects with an accruable Certified Emission reductions (CERs) of 119655. It has entered into a Memorandum of Understanding (MoU) with US Environment protection agency for identifying and capturing fugitive methane emitted from its various operations. On 6th February 2008, it has signed a MoU with State Oil Hydro, Norway to jointly develop carbon di oxide capture and sequestration (CCS) and environment management.

It has joined Carbon Disclosure Project, a global initiative. It has taken up GHG accounting, first step towards carbon foot printing and full fledged carbon disclosure system. During the year 2008-09 it has planned to account for nine sample operational activities.

Anti-Corruption:

It believes that business should work against corruption; a Chief Vigilance Officer heads the wing, all its activities are monitored. Awareness programmes are organised, an integrity pact is introduced, Vendor meets are conducted. The e-procurement and reverse auction has helped in dealing fairly. Payments to vendors is being done electronically.

Rallis India Limited:

It has been associated since 3rd January, 2003 and has communicated for the two years 2005-06 and 2006-07.

Human Rights:

Contractors working in the premises of the organization are required to follow employee benefit schemes and HR policy of minimum wages, deduction of provident fund or ESI. It does not have a structured system to assess HR performance of their contractors and suppliers in the supply chain. Its tender notices and contracts include clauses on Human Rights, safety and health. Training is provided on policies and procedures of Human rights issues and code of conduct. There has been no incident of discrimination.

Labour Standards:

Employees have the right to exercise freedom of association and collective bargaining. Cent percent of the non-management employees are covered under the trade union and collective bargaining. No child labour is engaged. There has been no incident of forced or compulsory labour and no indigenous right has been violated. Safety committees in all units are established.

Environmental Issues:

Policy: It has HSE policy in place, with a focus on energy conservation, pollution abatement mainly at the source of origin rather than at the end.

Action: It provides training to employees and

contract employees to increase the awareness level. As a policy none of its input materials are wastes of any other industry. Its by-product is sold to other industries as input. It has plans to re-use certain eco-friendly wastes generated elsewhere within the company as alternate fuel. Its energy requirements are taken care by its captive gas based power plants with cleaner mechanisms there by resulting in reduction of carbon dioxide emission. Its initiative to conserve water has led to reduction in consumption from 54KL/MT(2005-06) to 52.4KL/MT in 2006-07. It has undertaken initiatives for rain water harvesting and recycling of water. It declares that as its units are located in industrial areas biodiversity is not being impacted as defined in International Union for Conservation of Nature (IUCN) protected areas. It is in the process of carrying out a formal detailed account of GHG emissions for those other than carbon-dioxide. It has taken initiative to replace existing machinery by energy efficient ones. It is re-engineering to replace Freon 22.

Outcome: There have been no significant spills. As part of "polluter pays" it has paid Rs.2.98 lakh to the local district authorities.

Tata Chemicals:

Its association with GCP is from 23rd September, 2002 and has provided communication on progress for three years.

Human Rights:

It declares that it follows principles of the international declaration of Human Rights. Its policies envisage support, respect and protection of Human Rights, of its direct as well as indirect employees. It has a grievance redressal cell and help desk. The reports do not mention the stand with respect to the non complicit with regard to Human Rights abuses. It has the following policies in place: Safety, Health and Environment Policy, Community development policy,

Food safety cardinal rules of safety policy, Anti Sexual Harassment Policy.

Action: Well documented systems of record keepings, internal auditing, corrective and preventive action, planning and reviewing the process on regular basis is part of it. Third party surveillance audit validates the system. In the year 2007-08 it implemented HACCP system (Hazard Analysis Critical Control Points). A committee chaired by a women employee takes care of the redressal mechanism system, with respect to sexual harassment. During the years 2006-07 and 2007-08, five concerns were raised of which one is rejected after investigation and in two cases action was taken and in case of the other two counseling was given. Gender sensitization work shops are conducted.

Outcomes: Injury frequency rate has reduced. The surveys reveal that the employee satisfaction level increased from 66% in 2003-04 to 73% in 2004-05. The employee satisfaction level of Non Management Cadre : 63% (2005-06) and 71% (2006-07) and Management Cadre 59% and 60%.

Labour Standards:

It has adopted "Equal Opportunity Employee" policy, with a positive affirmative action with reference to Persons with Disability, of course the strength varies from 21 to 23 only. It abides by the Indian Factory Act and all the Indian Labour Laws. It recognizes Trade Unions and Staff Unions. The company 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. Periodic dialogues and negotiations with the recognized workmen and staff trade unions to discuss and settle the charter of demand amicably. Every three years election process identifies one union which is to be recognized by the company under the supervision of

Government authority. The joint committees are represented by Management and Worker cadres to resolve the issues. There are specific executives and personnel department to deal with all matters related to unions. It is OHSAS 18001 certified.

It states that it abides by Abolition of Bonded Labour Act 1976 and Contract Labour Abolition and Regulation Act 1970. The action taken and outcome with respect to Principle 4 is reported is the same in three communications, this reflects that new initiatives have been taken. Its policies are in alignment with ILO Convention 138 and also ensure that it complies with all the applicable laws. The co-dealers are officially communicated about the clause in the contract that child labour is not to be engaged in any form either directly or indirectly.

Environment:

Policies and Initiatives: A robust Environmental Management System in conformance with Central and State Government rules and regulations is in place. It follows the Montreal Protocol. It is ISO 14001 certified. It is signatory to "Responsible Care" Initiative. It is responsible for Charter for Environment and Protection (CERP). It is trying to institutionalize sustainability by creating awareness and reporting its performance as per Global Reporting Initiative (GRI) guidelines.

Actions: Periodic audit of EMS is undertaken. Annual environmental statements are submitted to the concerned Government Authorities. It carries out environment impact assessment study for some of its activities. Awareness about Clean Development Mechanism (CDM) has lead to identification of GHG reduction project. It has reduced the use of ODS (Ozone depleting substances) to a large extent in the initial years and later on in the year 2006-07 it was phased out completely. It has created a climate change cell to identify potential CDM projects. It has

established corporate green manufacturing index, with a focus on reduction in emissions and conservation of natural resources. As part of its' community outreach programme "Tejaswini", about five hundred members were engaged in dialogue about the environmental issues. It has put a zero effluent discharge plant.

Outcomes: As part of its CDM initiative it has identified 700 risks of which 655 were evaluated. It has phased out consumption of carbon tetra chlorides (CTC). It has reduced the consumption of Freon 22. It has been able to reduce its emissions and dependence on water consumption. It has improved its performance for the pollution prevention cycle of Responsible Care, the details are as follows:

Year	2003-04	2004-05	2005-06	2006-07
Points	52	62	75	81

Anti-Corruption:

It states that it is committed to anti corruption and prevention of bribery. It has institutionalized the Tata Code of Conduct. The code is accepted and signed by all employees of the company. Training and awareness programmes are held with respect to expected ethical behaviour.

Titan Industries Ltd.,:

It is associated with GCP since 14th October, 2002 and has sent its communication on progress to UN global compact thrice.

Human Rights:

It states that it follows the International declaration of Human Rights. All rights are fully protected and respected. The Human resources/ Industrial relations process by way of consultative committees are at all times constantly and proactively addressing issues in possible areas of conflict with

the unions.

Action: A continuous dialogue and feedback from employees and partners is taken. Surveys by third parties are encouraged for corrective action if any. The scores are good. It ensures a congenial working atmosphere. In the year 2007 and 2008, stakeholders are consulted in a transparent way.

Labour Standards:

Based on the company's policy and laws of the land, a 'collective bargaining' system is adopted. Annual periodic negotiation with employees is a common feature since the inception of the company. It has signed a mutually rewarding agreement with the union. Its' contracts with its suppliers and dealers specifies that child labour has to be discouraged. It declares that it is an equal opportunity employer and employs persons with disability and focuses on empowerment of women. In its special project 'Meadow' (Management and Development of enterprises in Women) it has enhanced the quality of life of two hundred underprivileged women. The improvement is measured through the Tata Index of Human Development. It states that there has been no evidence of forced labour.

Environmental Issues:

It states that it has been pro environment and has specific policies and guidelines since its inception. It is certified with ISO 9001 – QMS and ISO 14001 and is preparing the report in line with Global Reporting Initiative.

Action: Roof top rain water harvesting is in place. Hundred percent recycling of process effluent is done through reverse osmosis (RO) and mechanical evaporation system and used back in the process. Initiatives are undertaken to reduce the effluents. It is procuring 'Green Energy'. It has phased out TCE

from the manufacturing process with alternate eco-friendly solvents from December, 2006.

Outcomes: The extent of consumption of energy and other resources has dropped phenomenally due to the measures undertaken.

Anti-Corruption:

It has articulated 'Whistle Blower Policy', Gifting Policy and a 'Policy against Sexual Harassment'. All employees sign the Tata Code of Conduct.

General Observations and Conclusions:

- The number of companies associated with Global Compact in India is miniscule in comparison to the number of listed companies. It shows that companies are either not focusing on corporate social responsibility or they are not interested to be associated with international initiatives, like Global Compact

- The annual communication on progress of some companies is accompanied with the senior management reiterating the company's commitment to the ten Global Compact Principles. The commitment of senior management is either the Chairman and Managing Director (CMD), Director (Human Resources), Managing Director, General Manager (Human Resources) and others. In some cases, it is changing from year to year.

- The communication on progress of various companies do not follow a set period, while some follow calendar year others follow financial year. In some case the period is more than a year and the reporting period could commence somewhere in between the year. This makes comparison difficult for the interested parties.

- As the communication is on progress, it is observed that most of the companies do not mention the progress made in terms of either actions taken or

outcomes of the initiatives, rather the same content with some changes like the year is being reported.

- Except for a couple of companies, the major focus is on environmental issues.

- There are few companies which do not mention or consider the tenth principle i.e anti corruption issue in their communication on progress.

- Communication on progress of some companies is lacking consistency or in other words there is a lot of fluidity, the reason could be that this area is developing and as such no set standard is finalized as yet.

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