

G3.1 Content Index

Application Level				Assured by		
STANDARD DISCLOSURES PART I: Profile Disclosures						
1. Strategy and Analysis						
Profile Disclosure	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
1.1	Statement from the most senior decision-maker of the organization.	Fully	Refer page 8			
1.2	Description of key impacts, risks, and opportunities.	Fully	Refer page 48			
2. Organizational Profile						
Profile Disclosure	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
2.1	Name of the organization.	Fully	Refer page 12			
2.2	Primary brands, products, and/or services.	Fully	Refer page 14 and 15			
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	Fully	Refer page 13			
2.4	Location of organization's headquarters.	Fully	Refer page 14			
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Fully	Refer page 15			
2.6	Nature of ownership and legal form.	Fully	Refer page 12			
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	Fully	Refer page 15			
2.8	Scale of the reporting organization.	Fully	Refer page 12, 13, 52			
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	Fully	Refer page 16- 17			
2.10	Awards received in the reporting period.	Fully	Refer page 18			
3. Report Parameters						
Profile Disclosure	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	Fully	Refer page 24			
3.2	Date of most recent previous report (if any).	Not			Not applicable	This is the first sustainability report of the Lucky Cement Limited (LCL). Hence the said content in not applicable.
3.3	Reporting cycle (annual, biennial, etc.)	Fully	Refer page 24			
3.4	Contact point for questions regarding the report or its contents.	Fully	Refer page 24			
3.5	Process for defining report content.	Fully	Refer page 24			
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	Not			Not applicable	LCL does not have any joint ventures, subsidiaries and other entities.
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	Fully	There were no limitations			
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	Not			Not applicable	LCL does not have any joint ventures, subsidiaries and other entities.
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	Fully	Refer pages 24-25. There were no deviations from GRI.			
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	Not			Not applicable	This is the first sustainability report of LCL. Hence the said content in not applicable
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Not			Not applicable	This is the first sustainability report of LCL. Hence the said content in not applicable
3.12	Table identifying the location of the Standard Disclosures in the report.	Fully	GRI Content Index			
3.13	Policy and current practice with regard to seeking external assurance for the report.	Fully	LCL self declares that this report fulfils the requirements of Level A category report in accordance with the criteria set by the GRI under the G-3.1 framework. Assurance has not been obtained.			
4. Governance, Commitments, and Engagement						
Profile Disclosure	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	Fully	Refer page 26 - 30			
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	Fully	Refer page 28			
4.3	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	Fully	Refer page 28			
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Fully	Refer page 31			

4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	Fully	Refer page 31			
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully	Refer page 31			
4.7	Process for determining the composition, qualifications, and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	Not			Not applicable	The process is not in place.
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	Fully	Refer page 4, 6, 32, 52 - 60, 62, 80, 88-103			
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	Fully	Refer page 32			
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Fully	Refer page 32			
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Fully	Refer page 33, 62- 79, 53 - 55, 90			
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Fully	Refer page 34			
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: * Has positions in governance bodies; * Participates in projects or committees; * Provides substantive funding beyond routine membership dues; or * Views membership as strategic.	Fully	Refer page 33 - 34			
4.14	List of stakeholder groups engaged by the organization.	Fully	Refer page 36			
4.15	Basis for identification and selection of stakeholders with whom to engage.	Fully	Before engaging a stakeholder with the company's business processes, an informal assessment takes place on the part of the company's engagement.			
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Fully	Refer pages 40 to 47			
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	Not			Proprietary information	

STANDARD DISCLOSURES PART II: Disclosures on Management Approach (DMAs)

G3 DMA	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	To be reported in
DMA EC	Disclosure on Management Approach EC						
Aspects	Economic performance	Fully	Please refer Directors' Report (page 29) of our Annual Report 2011				
	Market presence	Fully	Refer: http://www.lucky-cement.com/index.php?option=com_content&view=article&id=72&Itemid=92				
	Indirect economic impacts	Fully	Refer: http://www.lucky-cement.com/index.php?option=com_content&view=article&id=92&Itemid=146				
DMA EN	Disclosure on Management Approach EN						
Aspects	Materials	Fully	Refer page 64				
	Energy	Fully	Refer page 64				
	Water	Fully	Refer page 64				
	Biodiversity	Fully	The management is committed to sustainable management of all the biological resources in the area and around the project sites which will be protected by all means.				
	Emissions, effluents and waste	Fully	Refer page 64				
	Products and services	Fully	Refer page 64				
	Compliance	Fully	All of LCL's activities are in compliance with the World Bank Guideline values for cement manufacturing- 1998 as well as within the mandatory legal standards - NEQS set under the Pakistan Environmental Protection Act - 1997(PEPA - 1997).				
	Transport	Fully	Our transport activities represent a relatively small part of our total carbon and environmental footprints. Nonetheless we are involved in a number of initiatives to mitigate the impact of transport on the environment including logistic optimisation.				
	Overall	Fully	The management is committed to invest in all such projects which would help reduce and manage our environmental footprint.				
DMA LA	Disclosure on Management Approach LA						
Aspects	Employment	Fully	Please refer page 83				
	Labor/management relations	Fully	Please refer page 83				
	Occupational health and safety	Fully	Please refer page 84				
	Training and education	Fully	Please refer page 85				
	Diversity and equal opportunity	Fully	Please refer page 85				
	Equal remuneration for women and men	Fully	Please refer page 86				
DMA HR	Disclosure on Management Approach HR						
Aspects	Investment and procurement practices	Fully	Please refer page 89				
	Non-discrimination	Fully	Refer management approach on diversity and equal opportunity on Page 85.				

	Freedom of association and collective bargaining	Fully	Please refer page 89				
	Child labor	Fully	Please refer page 88				
	Prevention of forced and compulsory labor	Fully	Please refer page 88				
	Remediation	Fully	Please refer page 93				
DMA SO	Disclosure on Management Approach SO						
Aspects	Local communities	Fully	Please refer 95				
	Corruption	Fully	Please refer 103				
	Public policy	Fully	Please refer 104				
	Anti-competitive behavior	Fully	Please refer 104				
	Compliance	Fully	LCL places strong emphasis on compliance with all applicable laws and regulation. LCL has a separate legal department which ensures the compliance of regulatory requirements.				
DMA PR	Disclosure on Management Approach PR						
Aspects	Customer health and safety	Fully	Please refer 106				
	Product and service labelling	Fully	Please refer 106				
	Marketing communications	Not			Not applicable	There are no marketing statutes or codes applicable to LCL	
	Compliance	Fully	Please refer PR-9				

STANDARD DISCLOSURES PART III: Performance Indicators

Economic							
Performance Indicator	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
Economic performance							
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Fully	Please refer Page 60				
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	Fully	LCL has considered climate change and the risks and opportunities it presents to the business. However, LCL has not yet quantitatively estimated the financial implications of climate change, but acknowledges that it is expected to have a profound effect on global cement industry and consequently on the activities of LCL. Climate change also offers significant business opportunities, particularly in the usage of alternative fuel and Waste Heat Recovery Projects (Refer environmental initiatives) while reducing emissions.				
EC3	Coverage of the organization's defined benefit plan obligations.	Fully	Refer: Annual Report Notes 4.11 (page 110) & 20 (page 119)				
EC4	Significant financial assistance received from government.	Fully	No significant financial assistance received during the year.				
Market presence							
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	Fully	Products such as Heavy Mobile Equipment and Coal are typically purchased from large multinational corporations at advantageous pricing and shipped to our plant locations. Remainder of our purchases are, by their very nature, local such as primary raw materials, labor based services, etc. We prefer local suppliers for all those goods and services which can easily be procured locally as per our acceptable standards.				
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	Fully	LCL is an equal opportunity employer at all locations. LCL has standardized recruitment processes and the selection of employees is made on the basis of merit without any prejudice or bias. The senior management comprises entirely of local residents. LCL defines "local residents" as those who are nationals of Islamic Republic of Pakistan.				
Indirect economic impacts							
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	Fully	Refer page 95-103				
Environmental							
Performance Indicator	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
Materials							
EN1	Materials used by weight or volume.	Fully	Please refer Page 50				
EN2	Percentage of materials used that are recycled input materials.	Fully	Nil				
Energy							
EN3	Direct energy consumption by primary energy source.	Fully	Please refer Page 71				
EN4	Indirect energy consumption by primary source.	Fully	Total indirect energy consumed is 8,629 GJ. This pertains to the electricity consumed from the national grid for headoffice and sales offices all over the country. No other form of intermediate/indirect energy is purchased/consumed by LCL.				
Water							
EN8	Total water withdrawal by source.	Fully	Please refer Page 76				
Biodiversity							
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Fully	Please refer page 75				
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Fully	Please refer page 75 and 76				

Emissions, effluents and waste							
EN16	Total direct and indirect greenhouse gas emissions by weight.	Fully	Standard used - WBCSD CSI Protocol - Methodology calculation based on site specific data - Fuel factor default values from IPCC. Refer Page 74. Indirect CO2 emission pertaining to purchased electricity is 1,088 tons.				
EN17	Other relevant indirect greenhouse gas emissions by weight.	Fully	There are no other indirect GHG emissions.				
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Fully	Refer environmental initiatives on Page 64-66				
EN19	Emissions of ozone-depleting substances by weight.	Fully	There are no emissions of ozone depleting substances.				
EN20	NOx, SOx, and other significant air emissions by type and weight.	Fully	Estimation has been made based on air emission testing reports. Refer Page 73.				
EN21	Total water discharge by quality and destination.	Not			Not available	We do not report on this item because LCL does not have any system available to reliably estimate the total water discharge by quality and destination.	2014
EN22	Total weight of waste by type and disposal method.	Partially	Types of wastes have been disclosed in Page 77-78.	Total weight of waste disposed off.	Not available	LCL maintains the record of all disposals by type and disposal method, but there is no system available to reliably estimate the total weight of all the disposals.	2014
EN23	Total number and volume of significant spills.	Fully	There are no significant spills during the year 2010-11.				
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	Fully	None.				
Products and services							
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	Fully	Refer environmental initiatives on Page 64, 65 and 66. Also, the nature of the product is such that it does not have negative environmental impacts on its use.				
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	Fully	Nil				
Compliance							
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Fully	Nil				
Social: Labor Practices and Decent Work							
Performance Indicator	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
Employment							
LA1	Total workforce by employment type, employment contract, and region, broken down by gender.	Partially	Male employees = 2058 Female employee = 13 All employees are full time permanent employees	Regional analysis	Not applicable	LCL has operations in Pakistan only and its HR strategy and policies have been implemented centrally for both factories and head office. Hence regional analysis of workforce is N/A for LCL.	
LA2	Total number and rate of new employee hires and employee turnover by age group, gender, and region.	Partially	Total number of employee hires=97 Total number of employee left=175 Total turnover is 8.81% (All males) Age range between 30-50 years Rate of employee hires =4.7 % Turnover rate = 8.45 %	Regional analysis	Not applicable	LCL has operations in Pakistan only and its HR strategy and policies have been implemented centrally for both factories and head office. Hence regional analysis of workforce is N/A for LCL.	
LA15	Return to work and retention rates after parental leave, by gender.	Fully	Female: 13 Entitled= 13 Aailed=0				
Labor/management relations							
LA4	Percentage of employees covered by collective bargaining agreements.	Fully	Total employees at Pezu plant (total no. 400) are covered by CBA. Percentage of employees covered by CBA = 19.3%				
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	Fully	Minimum notice period for permanent employees is 4 weeks as per applicable local laws				
Occupational health and safety							
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	Fully	There is no such formal health and safety committee. However, health and safety programmes are implemented and monitored on the effective recommendations of employees.				
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region and by gender.	Fully	Total number of injuries = 4 Injury rate (per 100 employees) = 0.02 Total number of lost days = 9 Lost days rate (per 100 employees) = 0.04 No. of work related fatality = 1 There are no occupational diseases and related absenteeism reported during the year. All injuries and fatalities pertains to male employees at Pezu plant.				
LA8	Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	Fully	At both plants (Khi and Pezu) separate dispensaries are available on both locations. The Doctors are also available on site, who also work to educate employees on occupational health issues. The programs include training on first aid, basic life support and fire fighting.				

Training and education							
LA10	Average hours of training per year per employee by gender, and by employee category.	Partially	All new hires are required to go through 4 days' orientation program. Other training programs are also conducted for middle and senior management. During the current year a 20 hour training session was conducted for 11 middle management people. The topics included were - Supply Chain Diploma - HR policy & procedure manual workshop - Technical training on Crain operation and Maintenance	Average number of training hours per employee by gender.	Not available	We do not report on this disclosure as the data is not captured presently, but we will be able to report on this in 2014.	2014
LA12	Percentage of employees receiving regular performance and career development reviews, by gender.	Fully	100% for management employees. The management by objective (MBO) system and balanced score card system is in place for performance reviews.				
Diversity and equal opportunity							
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	Partially	Board of Directors (Male= 6 Female= 2) Age group is between 30-50 years. Management Committee (Male = 5) Age group 30- 50 years	Employee breakdown by age, gender and minority groups.	Not material	The company encourages diversified mix of employees. However, reporting on diversity matrices for employees is not considered material by the management of LCL.	
Equal remuneration for women and men							
LA14	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	Fully	There is no gender based distinction				
Social: Human Rights							
Performance Indicator	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
Investment and procurement practices							
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	Not			Not applicable	No such agreements have been entered into during the reporting period.	
HR2	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening, and actions taken.	Not			Not applicable	The process is not in place.	
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	Fully	Orientation training is compulsory for all employees which covers policies and procedures and other concerning aspects of human rights that are relevant to operations. In percentage terms it is 100%.				
Non-discrimination							
HR4	Total number of incidents of discrimination and corrective actions taken.	Fully	The company practices fairness and equality. There is a transparent grievance mechanism in place. However, no such incident of discrimination took place during the year.				
Freedom of association and collective bargaining							
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	Fully	No. Such risk has been identified. Freedom of association is practised at LCL as it is required by law. All employees have the right by law to protect themselves. But, they have chosen not to practice it. No incidence of violation of freedom of association was reported in 2010-2011.				
Child labor							
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	Fully	Refer Page 93				
Forced and compulsory labor							
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	Fully	Refer Page 93				
Security practices							
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	Fully	100 %. Total number of security personnel= 192 Karachi Plant				
Assessment							
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	Fully	No such formal assessment is in place.				
Remediation							
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	Not	A very effective formal grievance mechanism is in place.		Proprietary information		
Social: Society							
Performance Indicator	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for Omission	Explanation	To be reported in
communities							
SO1	Percentage of operations with implemented local community engagement, impact assessments, and development programs.	Fully	The community investments of the company (pages 69-76) are the results of assessments of the impact of operations on local communities. LCL also regularly monitors its community development programmes through effective stakeholder engagement and visits of management at the plant side. However, due to increasing number of CSR activities, the company is planning to develop a CSR committee in its governance structure which will take care of the formal impact assessment.				

SO9	Operations with significant potential or actual negative impacts on local communities.	Fully	There are no such operations that have significant potential or actual negative impacts on the local communities. Mining activities, which include blasting of limestone quarries, may however have negative impacts on the surrounding communities and the local residents. However, there is no residential area in the outskirts of the quarries, which might be affected due to such activities. Despite no significant consequences, satisfactory preventive measures are in place which mainly include a prior notification of the blasting exercise to the residents of even the far surrounding areas and putting red-flags around the blasting area etc.				
SO10	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	Not			Not applicable	As discussed in SO9 there are no such operations that have significant potential or actual negative impacts on the local communities. Hence, the disclosure is not applicable.	
Corruption							
SO2	Percentage and total number of business units analyzed for risks related to corruption.	Fully	Refer page 103				
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	Fully	All employees of LCL are provided with orientation training at the time of joining. Such orientation programme includes training pertinent to the company's code of conduct and anti corruption policy.				
SO4	Actions taken in response to incidents of corruption.	Fully	There have been no identified incidents of corruption during the year				
Public policy							
SO5	Public policy positions and participation in public policy development and lobbying.	Fully	Refer page 104				
Anti-competitive behavior							
SO7	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	Fully	The Competition Commission of Pakistan has passed a single order on August 27, 2009 against all the cement manufacturers of the Country on the alleged ground of formation of cartel for marketing arrangement and thereby imposed upon a penalty at the rate of 7.5% on total turnover of each Company consisting of both local and export sales. The amount of penalty imposed on the Company is Rs. 1,271,840,925/- which has been challenged in the Court of Law. The Company's legal counsel is however confident that the Company has a good case and there are reasonable chances of success to avoid the penalty.				
Compliance							
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully	There have been no incidents of significant fines to the company for the non compliance of relevant statutory laws and regulations.				
Social: Product Responsibility							
Performance Indicator	Description	Reported	Cross-reference/Direct answer	If applicable, indicate the part not reported	Reason for omission	Explanation	To be reported in
Customer health and safety							
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	Partially	Please refer pg 105 for customer health and safety impact on product use.	Life cycle stages of the product for health and safety impact assessments	Not material	There are no significant health and safety impacts during defined stages of the product life cycle. However, health and safety impacts in relations to the products' use are mentioned on page 76.	
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	Fully	There have been no such non-compliances during 2010-2011				
Product and service labelling							
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	Fully	Refer pages 106				
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	Fully	There have been no such non-compliances during 2010-2011				
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Partially	Refer page 105	Survey results	Not material	The survey results do not indicate any major concern of customer dissatisfaction.	
Marketing communications							
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	Not			Not applicable	There are no marketing statutes or codes applicable to the company.	
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	Not			Not applicable	There are no marketing regulations or codes applicable to the company.	
Customer privacy							
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	Fully	Please refer 105				
Compliance							
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	Fully	There have been no reported incidents of significant fines to the company for the non compliance of relevant statutory laws and regulations.				