


2022 Communication on Progress

Efes Georgia (JSC Lomisi)

Published date
June 29, 2022

No. of questions
68

Supplemental files

CEO Statement
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Governance



Policies and Responsibilities

1. Does the Board / highest governance body or most senior executive of the company:

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



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



Issue an annual statement highlighting a zero tolerance for corruption



Sign off on organizational sustainability targets



Supervise Environmental, Social, and Governance reporting



Regularly review potential risks related to the business model



None of the above



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

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	No, this is not a current priority	No, but we plan to have a commitment within 2 years	Yes, and the commitment is focused on our own operations	Yes, and the commitment includes our own operations and the value chain	Yes, and the commitment includes our own operations and the value chain along with communities and society
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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


	No, this is not a current priority	No, but we plan to have a code of conduct within two years	Yes, focused on employee conduct	Yes, focused on employees and suppliers	Yes, focused on employees, suppliers, and other business relationships
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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


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

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

Prevention

6. Does the company have a process or processes to assess risk?

No, this is not a current priority	No, but we are planning to develop one in the next two years	Yes, related to our own operations	Yes, related to our own operations and entire value chain and other
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	No, this is not a current priority	next two years No, but we are planning to develop one in the next two years	Yes, related to our own operations	Yes, related to our own business relationships operations and entire value chain and other business relationships
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

6.1. During the assessment of risk, which business relationships are reviewed?


	A few suppliers or business relationships [approximately less than 25 %]	Several suppliers / business relationships (i.e., first tier or other high priority) [approx. 25 - 50 %]	Most suppliers / relevant business relationships [approx. 51 - 99 %]	All suppliers / relevant business relationships outside the supply chain
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

	No, this is not a current priority	No, but we are planning to develop one in the next two years	Yes, related to our own operations	Yes, related to our own operations and entire value chain and other business relationships
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Concerns and grievance mechanisms

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8. Are there any processes through which members of the company's workforce can raise concerns about the company's conduct related to human rights, labour rights, environment, or anti-corruption?

No, this is not a current priority

☐

No, but we plan to within two years

☐

Yes, we have an informal process (e.g., through supervisors, others)

☐

Yes, we have a formal process

☒

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

No

Yes

Is the process communicated to all employees/workers in local languages?

☐☒

Is the process available to non-employees (e.g., contractors, vendors, suppliers)?

☒☐

Is the process confidential (e.g., whistleblowing process)?

☐☒

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

9. Does the company provide or enable access to effective remedy to right holders / stakeholders where it has caused or contributed to the adverse impact?

	No process to enable remedy to stakeholders	Remedy available to some stakeholders (i.e., some geographies, employees only)	Remedy is available to all affected stakeholders	Remedy is available to all stakeholders, and suppliers are expected to have similar policies
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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Lessons

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

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

Executive Pay

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

	No, and we have no intention to change	No, but we plan to within two years	Yes
Human Rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights / Decent Work	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Board Composition

12. Percentage of individuals within the company's Board / highest governance body by:

	Number/Percentage	Not applicable (Please provide additional information)
Total number of board members (#)	<input type="text" value="7"/>	<input type="radio"/>
Male (%)	<input type="text" value="100"/>	<input type="radio"/>

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Female (%)

Number/Percentage

Not applicable (Please provide additional information)

Non-binary (%)

0

☐

Under 30 years old (%)

0

☐

30-50 years old (%)

100

☐

Above 50 years old (%)

0

☐

From minority or
vulnerable groups (%)

0

☐

Executive (%)

14.3

☐

Independent (%)

0

☐

13. Do you produce sustainability reporting according to:

National/local regulation on sustainability

☐

Security exchange regulations

☐

European Union Corporate Sustainability Reporting Directive (CSRD)

☐

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Global Reporting Initiative (GRI)

☐

Sustainability Accounting Standards Board (SASB)

☐

International Integrated Reporting Council (IIRC)

☐

Climate Disclosure Standards Board (CDSB)

☐

Task Force on Climate-related Financial Disclosures (TCFD)

☐

Other voluntary frameworks (please specify in text box)

☒

Anadolu Efes as the owner of Efes Georgia - annually presents a sustainability report which includes Efes Georgia information.

No sustainability reporting according to any frameworks nor regulations

☐

We do not produce sustainability reporting outside of this Communication on Progress

☐

Data Assurance

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

No assurance for any metrics

☒

Limited assurance for minority of metrics (e.g., GHG emissions only)

☐

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Limited assurance for majority of metrics ☐

Reasonable assurance for minority of metrics ☐

Reasonable assurance for majority of metrics ☐

Other (Please provide additional information) ☐

Human Rights



Materiality / Saliency

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

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

Child labour ☐

Forced labour ☐

Non-discrimination in respect of employment and occupation ☒

Occupational safety and health ☒

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Working conditions (wages, working hours) ☒

Freedom of expression ☐

Access to culture ☐

Access to water and sanitation ☐

Digital security / privacy ☒

Rights of women and/or girls ☒

Rights of indigenous peoples ☐

Free, prior and informed consent ☐

Rights of refugees and migrants ☐

Other ☐

Commitment

2. Does the company have a policy commitment in relation to the following human rights issues?

No, and we have no plans to develop a policy

No, but we plan to in the next two years

Yes, included within a broader policy

Yes, articulated as a stand-alone policy

Rights of women and/or girls




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	and/or girls	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy	Yes, articulated as a stand-alone policy
2019					
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2019					
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to culture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free, prior and informed consent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Optional comment					
All Those are written in Anadolu Efes Code of Business Conduct and Ethics					

2.1. For each human rights policy, is it:

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[illegible]

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Prevention

3. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following human rights issues?

[illegible]

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4. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this human rights issue?

[illegible]

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5. Who receives training for the following human rights issues?

	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization	Indirect suppliers of the organization	Other – such as partners, clients, etc.
Rights of women and/or girls	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Freedom of expression	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rights of refugees and migrants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Digital security / privacy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rights of indigenous peoples	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to culture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Free, prior and informed consent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to water and sanitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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


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	No monitoring of progress	Review issues on ad-hoc basis	Set annual targets/ goals, track progress over time (internal programs only)	Set annual targets/ goals, track progress over time (internal and external programs)	Other (Please provide additional information)
Rights of women and/or girls	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to culture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free, prior and informed consent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Response

7. During the reporting period, has the company been involved in providing or enabling remedy

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where it has caused or contributed to adverse impact associated with the following human rights issue(s)?

	Yes	No	Choose to not disclose	Not applicable (Please provide additional information)
Rights of women and/or girls	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freedom of expression	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of refugees and migrants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rights of indigenous peoples	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to culture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free, prior and informed consent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to water and sanitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional comment

In the company we Anadolu Efes Code of Business Conduct and Ethics, in case there is any breach of the provisions company is providing respective reaction pursuant to the rules of code

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

Not applicable

Labour

Commitment

1. Does the company have a policy commitment in relation to the following labour rights principles?

	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy	Yes, articulated as a stand-alone policy	Not applicable (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<div><input checked="" type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>
Child labour	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy	Yes, articulated as a stand-alone policy	Not applicable (Please provide additional information)
Non-discrimination in respect of employment and occupation	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input checked="" type="radio"/></div>	<div><input type="radio"/></div>
<div>2019</div>					
Occupational safety and health	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input checked="" type="radio"/></div>	<div><input type="radio"/></div>
<div>2019</div>					
Working conditions (wages, working hours)	<div><input checked="" type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>	<div><input type="radio"/></div>
Optional comment					
<div>We have no plan to develop those kinds of policies (Freedom of association and the effective recognition of the right to collective bargaining, Forced labour, Child labour, Working conditions) because the organic law of Georgia specifically the Labour Code of Georgia already considered those issues</div>					

1.1. For each labour rights policy, is it:

	Aligned with international labour standards?	Publicly available?	Approved at most senior level of the company?	Applied to the company's own	Applied to the company's supply chain and/or other	Developed involving labour rights expertise from inside and outside	Other (Please provide additional
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	Aligned with international labour standards?	Publicly available?	Approved at most senior level of the company?	Applied to the company's own operations?	Applies to the company's supply chain and/or other business relationships?	Developed company's labour rights expertise from inside and outside the company?	Other (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child labour	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Occupational safety and health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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3. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this labour rights issue?

	Provided internal training/capacity building for the direct workforce	Building capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducting an audit process and/or corrective action plan	Collective Action with peers or other stakeholders, in particular workers' organizations, to address the issue	Collaboration with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child labour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Occupational safety and health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>


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4. Who receives training for the following labour rights issues?

	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization	Indirect suppliers of the organization	Other – such as partners, clients, etc.
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Occupational safety and health	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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


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	No monitoring of progress	Review issues on ad-hoc basis	Set annual targets/ goals, track progress over time (internal programs only)	Set annual targets/ goals, track progress over time (internal and external programs)	Other (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Occupational safety and health	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Performance

6. What is the percentage of employees covered under collective bargaining agreements?

Percent of employees (%)


Unknown

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Percent of employees (%)

Unknown

Employees covered
under collective
bargaining (%)

0



7. What is the percentage of employees in a trade union or other workers' organization?

Percent of employees (%)

Unknown

Not applicable (Please provide
additional information)

Employees in a trade
union or on a worker
committee (%)

0



8. In the course of the reporting period, what was the percentage of women in:

Percent of women (%)

Unknown

Senior leadership level
position

56.25



Non-executive board

0



Optional comment

We do not have a non-executive board

9. What was the average ratio of the basic salary and remuneration of women to men (comparing


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jobs of equal value) during the reporting period?

Salary ratio (%)

Unknown

Choose to not disclose

Women / Men (%)

0

Optional comment

women and the men have same rights, salary and remuneration do not change according to gender.

10. In the course of the reporting period, how frequently were workers injured (injuries per hour worked)?

Frequency of injury

Unknown

Choose to not disclose

Frequency of injury

1.29

Optional comment

Frequency rate per 1000000 working hour

11. In the course of the reporting period, what was the company's incident rate?

Incident rate

Unknown

Choose to not disclose

Incident rate

0.29

Optional comment


Incident rate per 100 employees

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Response and Reporting

12. In the course of the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to the adverse impact associated with the following labour rights issues?


	Yes	No	Choose to not disclose	Not applicable (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Occupational safety and health	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

For all Employees provided trainings about Human rights

Environment

Commitment

1. Does the company have a formal policy on the following environmental topics?

	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy	Yes, articulated as a stand-alone policy	Not applicable (Please provide additional information)
Climate Action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2019					


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Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	No, and we have no plans to develop a policy	No, but we plan to in the next two years	Yes, included within a broader policy	Yes, articulated as a stand-alone policy	Not applicable (Please provide additional information)
Forests / Biodiversity / Land Use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2019					
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2019					
Energy & Resource Use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2022					

1.1. For each environmental policy, is it:

	Aligned with international environmental standards?	Publicly available?	Approved at most senior level of the company?	Applied to the company's own operations?	Applied to the company's supply chain and/or other business relationships?	Developed involving environmental expertise from inside and outside the company?	Other (Please provide additional information)

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Climate Action	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Aligned with international environmental standards?	Publicly available?	Approved at most senior level of the company?	Applied to the company's own operations?	Applied to the company's supply chain and/or other business relationships?	Developed involving environmental expertise from inside and outside the company?	Other (Please provide additional information)
Water	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Oceans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forests / Biodiversity / Land Use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air Pollution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Energy & Resource Use	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Prevention

2. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following environmental issues?

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[illegible]

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3. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with these environmental topics?

	Provided internal training/ capacity building for the direct workforce	Building capacity among relevant business relationships (e.g., partners, suppliers, clients, etc.)	Conducting an audit process and/or corrective action plan	Collective Action with peers or other stakeholders to address the issue	Collaboration with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Climate Action	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oceans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forests / Biodiversity / Land Use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy & Resource Use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>


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


	No monitoring of progress	Review issues on ad-hoc basis	Set annual targets/ goals, track progress over time (internal programs only)	Set annual targets/ goals, track progress over time (internal and external programs)	Other (Please provide additional information)
Climate Action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests / Biodiversity / Land Use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & Resource Use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

Description of targets (e.g., what is the target, absolute vs. intensity, externally verified, on track, etc.)	
Climate Action	
Energy & Resource Use	Annually reduce the cost of energy and resources for the production of a unit of product
Water	
Forests / Biodiversity / Land Use	
Air Pollution	
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	
Oceans	

4.2. For each environmental topic in which the company sets timebound goals / targets, how is progress against target / goal tracked?

Progress is reviewed against goals annually or more frequently	Progress is reported internally to the most senior level	Progress is reported externally	Other (Please provide additional information)
--	--	---------------------------------	---


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

5. In the course of the reporting period, has the company been involved in providing or enabling remedy for any actual impacts associated with the following environmental issue(s)?

	Yes	No	Choose to not disclose	Not applicable (Please provide additional information)
Climate Action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>


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	Yes	No	Choose to not disclose	Not applicable (Please provide additional information)
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests / Biodiversity / Land Use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air Pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & Resource Use	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional comment

The compressor and boiler were modernized

Climate Action

6. What were the company's gross global greenhouse gas emissions for the reporting period?

Scope 1 Emissions

Full☐


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None

Emissions (tCO2e)

3842

Scope 2 Emissions

Full

None

We have only one emission point (boiler)

Emissions (tCO2e)

Scope 3 Emissions

Full

Partial

None

We have only one emission point (boiler)

Emissions (tCO2e)

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

Percent of revenue (%)

Unknown



Not applicable (Please provide additional information)



8. Has the organization acted to support climate change adaptation and resilience?

We have taken action to increase organization-wide resilience to climate change



We have taken action to increase resilience in our supply chains



We have taken action to increase resilience in the communities in which we operate



We have provided funding for climate change adaptation and resilience initiatives and projects



We have not taken actions to build climate change resilience in the reporting period



Other (Please provide additional information)



Unknown



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Energy / Resource Use

9. Please report the company's renewable energy consumption as a percentage of total energy consumption in the reporting period.

% of total energy consumption

Unknown



Technology

10. What percent of the company's revenue came from environmentally friendly products / services during this reporting period?

Percent of total revenue (%)

Unknown



Not applicable (Please provide additional information)

☐

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Sector-specific Questions

11. Which sector(s) does the company operate in? If diversified, choose top 3 by revenue.

Oil & gas

☐

Chemicals

☐

Basic resources

☐

Construction & materials

☐

Industrial goods & services

☐

Automobiles & parts

☐

Food & beverage

☒

Household & personal goods

☐

Health care

☐

Retail

☐

Media

☐

Travel & leisure

☐

Telecom

☐


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- Utilities☐
- Banks☐
- Insurance☐
- Real estate☐
- Financial Services☐
- Technology☐

Sector-specific: Water

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

Water withdrawal (volume of water in megaliters):


	Mega-liters	Unknown	Not applicable (Please provide additional information)
Total	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Groundwater:	<input type="text" value="429.05"/>	<input type="radio"/>	<input type="radio"/>
Surface water:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>

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	Mega-liters	Unknown	Not applicable (Please provide additional information)
Rainwater:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Wastewater:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Percentage of water withdrawn in regions with high or extremely high water stress (%)	<input type="text"/>	<input type="radio"/>	<input type="radio"/>

Water consumption (volume of water in megaliters):

	Mega-liters	Unknown	Not applicable (Please provide additional information)
Total	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Groundwater:	<input type="text" value="429.05"/>	<input type="radio"/>	<input type="radio"/>
Surface water:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Rainwater:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Wastewater:	<input type="text"/>	<input type="radio"/>	<input type="radio"/>
Percentage of water consumed in regions	<input type="text"/>	<input type="radio"/>	<input type="radio"/>

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with high or extremely high water stress (%)	<input type="text"/>	<input type="text"/>	Unknown	Not applicable (Please provide additional information)
--	----------------------	----------------------	---------	--

13. Please provide details about the company's water intensity of products in regions with high or extremely high water stress.

Water intensity of products (cubic meter/\$):

Unknown

☐

Our region is not considered as water stress area

Sector-specific: Forest, biodiversity, and land use

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

	Number	Unknown	Not applicable (Please provide additional information)
--	--------	---------	--

Sites	<input type="text"/>	<input type="text"/>	<input type="text"/>
-------	----------------------	----------------------	----------------------


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0	Number	0	Unknown	0	Not applicable (Please provide additional information)
0	Hectares	0	0	0	0

15. What area (in hectares) of natural ecosystems was converted during the reporting period in areas owned, leased, or managed by the company?

Conversion of natural resources (hectares)	0
Unknown	0
Not applicable (Please provide additional information)	0

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


	No	No, but we plan to in the next 2 years	Yes
Forest ecosystem restoration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other ecosystem restoration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reforestation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Natural regeneration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Natural regeneration	<input checked="" type="radio"/> No	<input type="radio"/> No, but we plan to in the next 2 years	<input type="radio"/> Yes
Agroforestry	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set-aside land	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biodiversity offsetting	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify in text box)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Overall Environment

21. Briefly describe practical actions the company has taken during the reporting period and/or plans to take to implement the environment principles, including any challenges faced and actions taken towards prevention and/or remediation.

To implement ISO 14001

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Commitment

1. Does the company have an anti-corruption compliance programme?

No, it is not an immediate business priority

☐

No, but we plan to in the next two years

☐

Yes

☒

2019

Optional comment

Anadolu Efes Code of Business Conduct and Ethics

2. Does your company have policies and recommendations for employees on how to act in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

No, and we have no plans to develop a policy

☐

No, but we plan to in the next two years

☐

Yes, included within a broader policy

☐

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Yes, articulated as a stand-alone policy



Prevention

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

No training provided

☐

Select employees

☐

All employees

☒

Contractors

☐

Direct suppliers of the organization

☐

Indirect suppliers of the organization

☐

Other – such as partners, clients, etc.

☐

3.1. How often is such training provided?

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	One time only	Every year	Every two or more years	We do not collect this data
All employees	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Select employees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contractors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct suppliers of the organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other – such as partners, clients, etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indirect suppliers of the organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

No, we do not monitor the anti-corruption compliance programme

☐

Review issues on ad-hoc basis

☐

Yes, through internal employee self-evaluations

☒

Yes, through automated controls monitoring

☐

Yes, through external independent monitoring

☐

Yes, through other mechanisms

☐

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Response and Reporting

5. Please report the company's total number and nature of incidents of corruption during the reporting year.

	Number of incident(s)	Unknown	Choose to not disclose
Confirmed during the current year, but related to previous years	<input type="text" value="0"/>	<input type="radio"/>	<input type="radio"/>
<input type="text" value="In the company was not this kind of incident"/>			
Confirmed during the current year, and related to this year	<input type="text" value="0"/>	<input type="radio"/>	<input type="radio"/>
<input type="text" value="In the company was not this kind of incident"/>			

6. Within the reporting period, what measures has the company taken to address suspected incidents of corruption independently or in response to a dispute or investigation by a government regulator?

Initial case assessment	<input type="checkbox"/>
Internal investigation	<input type="checkbox"/>
Review by risk / ethics committee	<input checked="" type="checkbox"/>

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Review by board of directors

☐

External audit / review

☐

Other (please provide additional information)

☐

Not applicable/no incidents in the reporting period

☐

7. Does your company engage in Collective Action against corruption?

No, it is not an immediate business priority

☒

No, but we plan to in the next two years

☐

Yes (please explain)

☐

8. Briefly describe practical actions the company has taken during the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation.

Annual training about the ethics code for all employees.

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