Identitii Limited
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# Corporate Social Responsibility Policy

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# Introduction

## Context

The context surrounding Corporate Social Responsibility (CSR) has evolved significantly over the years, driven by factors such as heightened public awareness, changing societal expectations, and the recognition of the interconnectedness between businesses and the communities they operate in. With growing concerns about environmental degradation, social inequalities, and ethical practices, companies are being urged to go beyond profit-making and adopt a more holistic approach that considers their impact on the planet, people, and communities.

## Purpose

The purpose of this Corporate Social Responsibility (CSR) Policy is to outline Identitii's commitment to conducting business in a responsible and sustainable manner and to integrate CSR considerations into our business practices, decision-making processes, and interactions with stakeholders. It serves as a guiding document that aligns our operations with the principles of social and environmental stewardship.

## Scope

This policy applies to all employees, contractors, suppliers, and partners associated with Identitii Limited and its wholly owned subsidiaries. It encompasses operations and activities across all locations where the group operates.

## Objectives

1. To promote a culture of integrity, transparency, and ethical behaviour throughout Identitii.
2. Complying with all applicable laws and regulations, preventing corruption and bribery, and upholding human rights.
3. To minimise our environmental footprint and contribute to the conservation of natural resources.
4. Implement sustainable practices, adopt renewable energy sources, and effectively manage waste and recycling.
5. Prioritise the well-being, health, and safety of our employees.
6. Provide equal opportunities, foster a supportive work environment, and offer training and development opportunities to empower our workforce.
7. Actively engage with and contribute to the well-being of the communities in which we operate.
8. Support local initiatives, collaborate with nonprofit organisations, and encourage our employees to volunteer their time and skills.

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# Policy implementation

## Responsible parties involved in implementation

Roles and responsibilities incl. responsible authorities for monitoring and enforcement.

| Role | Responsibilities |
|---|---|
| Board of Directors | • Provide strategic oversight and governance for CSR initiatives.<br>• Set the overall direction and goals related to corporate social responsibility.<br>• Review and approve the policy, monitor its implementation, and assess its impact on performance and reputation.<br>• Support executive leadership in driving CSR practices throughout the organisation. |
| Senior Leadership | • Implement the CSR policy by providing leadership, guidance, and resources.<br>• Communicate the importance of CSR to all employees and monitor progress.<br>• Align business strategies with CSR goals and champion CSR initiatives. |
| People Operations | • Promote and enforce fair treatment, equal opportunities, employee well-being, and other related initiatives.<br>• Embed CSR practices in processes such as recruitment, performance management, and employee engagement.<br>• Provide training and development opportunities aligned with CSR objectives and ensure compliance with ethical practices and laws. |

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## Communication and distribution

To ensure effective communication of the policy to relevant stakeholders, the following steps can be taken:

1. Distribution and accessibility:
    a. The policy document should be made available to all relevant stakeholders in a centralised and easily accessible location. This could be achieved by publishing the policy on the organisation's intranet, document management system, or employee portal.
    b. Additionally, stakeholders should be notified about the availability of the policy and provided with instructions on how to access it.
2. Training and awareness programs:
    a. Conduct training sessions or workshops to educate stakeholders about the policy and its importance.
    b. These sessions can include presentations, interactive discussions, and practical examples to enhance understanding.
    c. Ensure that all employees, including executives, managers, and staff in different roles, attend the training sessions.
    d. It is also important to conduct periodic refresher training to reinforce key policy concepts.
3. Acknowledgement and acceptance:
    a. Require stakeholders to acknowledge their understanding and acceptance of the policy. This can be done through the implementation of an electronic or physical acknowledgement process where stakeholders sign or electronically acknowledge that they have read and understood the policy. This ensures that stakeholders are aware of their responsibilities and are accountable for complying with the policy.
4. Communication channels:
    a. Utilise various communication channels to reinforce the policy's message and updates.
    b. These channels can include internal newsletters, email communications, team meetings, and notice boards.
    c. Regularly communicate updates or changes to the policy, and emphasise the importance of adhering to the policy's guidelines.

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5. Ongoing support and guidance:
    a. Establish a designated point of contact to address stakeholders' questions, provide guidance, and offer support related to the policy. This ensures that stakeholders have access to the necessary resources and assistance to comply with the policy.
6. Integration into onboarding process:
    a. Incorporate the policy into the onboarding process for new employees.
    b. During orientation, provide an overview of the policy, explain its relevance to their role, and highlight the expectations for compliance.
    c. Provide access to the policy document and ensure that new employees acknowledge their understanding and acceptance of the policy.
7. Periodic policy review:
    a. Regularly review the policy to ensure its effectiveness and relevance in addressing evolving threats and technologies.
    b. Engage stakeholders in the review process by soliciting feedback and incorporating their insights and experiences into policy updates.
    c. Communicate any changes or revisions to the policy to all stakeholders in a timely manner.

## Policy change requests

The process for requesting a change to the policy may typically involve the following steps:

1. Identify the need for change
    a. Any stakeholder who identifies the need for a change to the policy should carefully evaluate the rationale behind it. This may include new risks, regulatory changes, technological advancements, or feedback received from employees, auditors, or other relevant sources.
    b. It's important to clearly articulate the reasons for the proposed change.
2. Document the proposed change:
    a. The stakeholder requesting the change should document the proposed modifications to the policy. This includes detailing the specific sections or clauses that require revision, addition, or removal, along with a clear explanation of the desired changes and the expected outcomes.
3. Impact assessment:
    a. The proposed change should undergo an impact assessment to evaluate its potential consequences. This assessment may involve considering the impact on existing processes, procedures, technical controls, resources, and compliance requirements.
    b. It's crucial to assess both the positive and negative implications of the change.
4. Consultation and collaboration:
    a. The stakeholder should engage in consultation and collaboration with relevant parties to gather input and feedback. This may include discussions with members of the legal counsel, HR, risk management personnel, and other subject matter experts. Their expertise and perspectives can help evaluate the viability and effectiveness of the proposed change.

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5. Review and approval process:
    a. The proposed change should undergo a formal review process, which may involve a designated committee or a specific individual responsible for policy management.
    b. The review process evaluates the proposed change in light of the organisation's goals, compliance requirements, and overall risk posture.
    c. The approval authority assesses the proposed change and decides whether to approve, reject, or request further modifications.
6. Communication and documentation:
    a. Once the change is approved, it should be communicated to all relevant stakeholders. This includes updating the policy document with the revised sections or incorporating an addendum to the existing policy.
    b. The updated policy should be made easily accessible to all stakeholders through the organisation's established communication channels.
7. Training and awareness:
    a. Conduct training or awareness sessions to educate employees about the revised policy. This ensures that all individuals affected by the change are aware of their new obligations and understand the reasons behind the modification.
    b. Training sessions may include explanations of the change, examples of its practical application, and clarification of any questions or concerns raised by employees.
8. Implementation and monitoring:
    a. The revised policy should be implemented and enforced across the organisation.
    b. Ongoing monitoring and compliance assessments should be conducted to ensure adherence to the updated policy
    c. Any deviations or non-compliance should be addressed through appropriate corrective actions.

## Policy exception process

Implementing a policy exception requires a careful evaluation and approval process to ensure that exceptions are justified, properly managed, and do not compromise the organisation.

The process for implementing a policy exception typically involves the following steps:

1. Identify the need for an exception:
    a. A stakeholder or individual within the organisation identifies a situation or circumstance that warrants an exception to a specific policy.
    b. The need for the exception must be clearly defined and supported by valid reasons, such as business requirements, technical limitations, or legal or regulatory obligations.
2. Documentation of the exception request:
    a. The stakeholder requesting the exception should document the details of the exception request. This includes specifying the policy or control from which the exception is sought, describing the reason for the exception, and providing any supporting evidence or documentation.

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3. Evaluation and risk assessment:
    a. The exception request undergoes an evaluation and risk assessment process. This involves assessing the potential impact of granting the exception on the organisation's legal, compliance, and overall risk posture.
    b. The evaluation should consider the severity of the identified risk, available mitigating controls, and alternative solutions to address the situation.
4. Review and approval process:
    a. The exception request is reviewed by the appropriate authority or committee responsible for policy governance and compliance. This may involve the HR, risk management personnel, legal counsel, or other relevant stakeholders.
    b. The review assesses the justification, feasibility, and acceptability of the requested exception.
    c. The approval authority makes a decision to approve, reject, or request further modifications to the exception request.
5. Documentation and tracking:
    a. Once the exception is approved, it should be properly documented, including the justification for the exception, the approval details, and any conditions or limitations associated with the exception. This documentation helps ensure transparency, accountability, and auditability.
    b. The exception request and its approval status should be tracked in a centralised repository or system for future reference and reporting.
6. Communication and awareness:
    a. The approved exception should be communicated to the relevant stakeholders who are affected by the exception. This includes notifying individuals responsible for implementing or enforcing the policy, as well as any other personnel who may be impacted by the exception.
    b. It's essential to ensure that all affected parties understand the scope, limitations, and duration of the exception.
    Monitoring and review:
    c. The exception should be periodically reviewed to assess its ongoing relevance and validity. This includes monitoring the associated risks, evaluating any changes in the organisation's environment, and reassessing the need for the exception.
    d. If circumstances change, the exception may be modified, extended, or revoked based on the reassessment results.
7. Reporting and accountability:
    a. The exception process should include reporting mechanisms to ensure proper oversight and accountability. This may involve regular reporting to senior management, the board of directors, or other governing bodies to provide visibility into the exceptions granted and their associated risks.

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# Policy requirements

## Requirements applicable to all staff

1. Comply with applicable laws, regulations, and company policies related to ethical practices, environmental sustainability, employee well-being, and community engagement.
2. Uphold high standards of integrity, transparency, and ethical behaviour in their day-to-day activities, interactions with colleagues, clients, suppliers, and stakeholders.
3. Actively contribute to minimising the organisation's environmental footprint by following sustainable practices, conserving resources, and participating in recycling and waste management initiatives.
4. Respect and promote human rights, treating all individuals with fairness, dignity, and respect, regardless of their background, race, gender, or other protected characteristics, in line with the People & Culture Policy.
5. Active Community Engagement:
6. All staff members are encouraged to actively engage in community initiatives, participate in volunteering activities, and support local projects aligned with the organisation's CSR objectives.

## Requirements applicable to line managers

1. Lead by example, demonstrating ethical conduct, environmental responsibility, respect for human rights, and active community engagement in their own behaviour and decision-making.
2. Prioritise the well-being, health, and safety of their team members, providing a supportive work environment, addressing concerns, and promoting work-life balance.
3. Identify and support training and development opportunities for their team members.
4. Performance Evaluation:
5. Ensure employees' contributions to CSR initiatives are recognised and valued.
6. Communicate the organisation's CSR goals, initiatives, and progress to their teams regularly.

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# Principles

## Ethical practices

### Compliance with laws and regulations

We are committed to fully complying with all applicable laws, regulations, and industry standards governing our operations in Australia. We will conduct our business in accordance with the legal requirements of the country, ensuring that our activities and practices meet or exceed the established standards. Through regular monitoring, training, and audits, we will maintain a robust compliance program to uphold the highest level of legal and regulatory compliance.

### Promotion of ethical behaviour and integrity

Integrity is fundamental to our business practices. We promote a culture of ethical behavior, honesty, and integrity among our employees and stakeholders. All individuals associated with Identitii are encouraged to act ethically, demonstrating high moral standards in their interactions, decision-making processes, and business transactions.

### Prevention of corruption and bribery

We have a zero-tolerance approach to corruption and bribery in any form. We strictly adhere to anti-corruption laws and regulations, and we expect all employees, contractors, suppliers, and partners to do the same. Our commitment to preventing corruption and bribery extends to all our business activities, both domestically and internationally. We maintain a comprehensive Anti-Bribery & Corruption Policy to identify and mitigate corruption risks, provide training to raise awareness, and encourage reporting of any suspected corrupt practices.

### Protection of human rights

We are dedicated to upholding and respecting human rights in all aspects of our operations. Recognising the fundamental rights and dignity of every individual, we are committed to ensuring that our business activities do not infringe upon or contribute to any human rights abuses. Our responsibility extends to our employees, contractors, and the communities in which we operate. We will work to identify and address any potential human rights risks, establish grievance mechanisms, and promote diversity, equality, and inclusivity.

### Recognition of Australian First Nations people

We acknowledge and recognise the Australian First Nations people as the original and continuing custodians of the land on which we operate. We pay our respects to Elders past and present, acknowledging their ongoing connection to Country. As an organisation, we are committed to fostering a culture of reconciliation and promoting the rights, cultures, and histories of Australian First Nations people.

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We recognise the importance of actively engaging and collaborating with First Nations communities, respecting their knowledge, traditions, and protocols, and strive to build strong relationships based on mutual respect, trust, and understanding. We support initiatives that promote the social, economic, and cultural empowerment of First Nations people and will ensure our operations and business practices respect and protect their cultural heritage, sacred sites, and traditional land management practices. We will seek their involvement and consultation in decision-making processes affecting their lands, waters, and cultural sites.

When invited to speak, we will actively participate in reconciliation initiatives, support Truth-Telling processes, and promote awareness and understanding of the histories, cultures, and contributions of First Nations people. This policy statement reflects our dedication to acknowledging and respecting the rights, cultures, and heritage of Australian First Nations people, and we are committed to working in partnership towards a shared future of reconciliation, mutual respect, and equality on the lands and waters we all call home.

## Environmental sustainability

### Conservation of natural resources

We are committed to the conservation of natural resources in all our business activities, recognising the importance of preserving Australia's unique ecosystems and biodiversity. We will strive to minimise our consumption of natural resources such as water, land, minerals, and forests by employing sustainable practices that promote their efficient use. Through ongoing assessment, innovation, and collaboration, we will work towards reducing our impact on natural resources and contributing to their long-term preservation.

### Reduction of environmental footprint

We are dedicated to reducing our environmental footprint across all aspects of our operations. We will proactively identify opportunities to minimise our emissions, energy consumption, and waste generation. Through the implementation of environmentally friendly technologies, processes, and practices, we aim to continually improve our efficiency and decrease our environmental impact. Our commitment extends to the prevention of pollution and the responsible management of resources.

### Use of renewable energy sources

We recognise the importance of transitioning to a low-carbon economy and reducing our reliance on fossil fuels. We will actively seek opportunities to integrate renewable energy sources into our operations and explore energy efficiency measures to optimise our energy consumption.

### Waste management and recycling

We are committed to effective waste management and recycling practices. We will participate in waste reduction strategies, including source reduction, reuse, and recycling initiatives. Through responsible waste management, we aim to minimise the environmental impact of our waste and contribute to the circular economy. We will comply with all relevant waste management regulations, promote awareness and education among our employees, and collaborate with stakeholders to find innovative solutions for waste reduction and recycling.

## Employee well-being and development

The following policy statements are in support of our existing People & Culture Policy.

### Fair treatment and equal opportunities

We are committed to providing fair treatment and equal opportunities to all our employees. We value diversity, inclusivity, and non-discrimination in our workforce, ensuring that all individuals are treated with respect, dignity, and fairness, regardless of their background, race, gender, age, disability, or other protected characteristics. We will maintain policies, practices, and procedures that promote equal opportunities in recruitment, hiring, training, career advancement, and remuneration.

### Health and safety measures

The health, safety, and well-being of our employees are of utmost importance to us. We are committed to providing a safe and healthy working environment for all. We will identify and mitigate workplace hazards, implement effective health and safety management systems, and comply with relevant laws and regulations. We will promote a culture of safety, encouraging employees to actively participate in maintaining a safe work environment by reporting incidents, near-misses, and potential hazards. We will provide appropriate training, resources, and support to ensure the physical and mental well-being of our employees.

### Work-life balance

We recognise the importance of work-life balance in supporting the well-being and productivity of our employees. We are committed to providing flexible work arrangements, where feasible, to accommodate personal and family responsibilities. We encourage open communication and collaboration, enabling employees to manage their workload effectively and maintain a healthy work-life balance. We will foster a supportive work environment that values and respects the personal needs and priorities of our employees, contributing to their overall satisfaction and engagement.

### Training and career development opportunities

We are dedicated to investing in the professional growth and development of our employees. We will provide ongoing training, learning opportunities, and career development programs to enhance their skills, knowledge, and capabilities. We will support individual career aspirations and create pathways for advancement within the organisation. Through mentorship, coaching, and performance feedback, we will foster a culture of continuous learning and growth. Our goal is to empower our employees to reach their career goals, fulfil their potential, and contribute to the long-term success of our organisation.

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### Community engagement

#### Support for local communities

We are committed to supporting the communities in which we operate. We recognise the importance of contributing to their social, economic, and environmental well-being. We will strive to build meaningful partnerships with local community organisations, businesses, and residents. Through financial contributions, in-kind donations, and employee volunteering efforts, we aim to address community needs, support local initiatives, and create a positive impact. By actively engaging with and investing in our local communities, we aim to foster sustainable development, enhance social cohesion, and build strong relationships based on trust and collaboration.

#### Volunteering and philanthropy initiatives

We believe in the power of volunteering and philanthropy to create positive change. We encourage our employees to actively participate in volunteering activities and contribute their skills, time, and resources to community causes. We may support and facilitate employee volunteering initiatives by providing paid time off, organising group volunteering opportunities, and recognising and celebrating their contributions. Through our collective efforts, we aim to make a meaningful difference in the lives of individuals and communities in need.

#### Stakeholder engagement and dialogue

We value open and transparent communication with our stakeholders and recognise the importance of engaging in meaningful dialogue to understand their needs, expectations, and concerns. We will actively welcome input from stakeholders, including local communities, customers, employees, suppliers, regulators, and NGOs. We will establish channels for feedback, consultation, and collaboration, ensuring that their voices are heard and considered in our decision-making processes. By fostering strong stakeholder relationships and engaging in constructive dialogue, we aim to build trust, mutual understanding, and shared value.

# Policy compliance and enforcement

## Examples of non-compliance

### Misconduct

Misconduct refers to actions or behaviour by an employee that deviates from the expected standards of conduct outlined in corporate policies or codes of conduct. It typically involves violations of company policies, rules, or guidelines, which may result in minor breaches or disruptions in the workplace. Examples of misconduct include:

1. Neglecting to follow company guidelines on waste management and recycling.
2. Not adhering to the company's environmental sustainability practices, such as conserving resources or reducing waste.

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### Serious misconduct

Serious misconduct refers to actions or behaviour that significantly and detrimentally impact the organisation, its employees, clients, or stakeholders. It involves more severe violations that breach ethical standards, cause harm, or disrupt the workplace environment. Serious misconduct may have legal implications and can result in immediate termination of employment. Examples of serious misconduct include:

1. Harassment or bullying of colleagues.
2. Ignoring safety protocols, leading to environmental harm or endangering the health and safety of employees.
3. Discriminating against employees or community members
4. Engaging in corrupt practices or accepting bribes that affect the company's social responsibility commitments, such as undermining fair trade practices or ethical sourcing.

## Consequences for non-compliance

While misconduct is considered a breach of company policies, it is typically addressed through disciplinary measures or corrective actions, such as verbal warnings, written warnings, counselling, or performance improvement plans.

Due to the severe nature of serious misconduct, immediate and decisive action is often taken, including disciplinary proceedings, investigations, termination, and potential legal consequences.

# Policy monitoring and evaluation

## Monitoring and evaluation

Monitoring and evaluating the progress and effectiveness of the policy is crucial to ensure its continuous improvement and alignment with organisational goals. Monitoring and evaluation may be conducted through internal audit, external audit, and manual audits of controls:

1. Internal audit:
    a. Internal audit teams or personnel, independent from the areas being audited, can assess the implementation and compliance of the policy.
    b. Internal audits can include a review of controls, processes, and procedures to determine their effectiveness and identify any gaps or weaknesses.
    c. Internal auditors can conduct regular audits based on an audit plan, which outlines the areas to be audited and the frequency of audits.
    d. The internal audit function can evaluate the organisation's adherence to the policy's requirements, identify areas of non-compliance, and provide recommendations for improvement.
    e. The internal audit team may also assess the effectiveness of processes, risk management practices, and awareness and training programs.

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2. External audit:
    a. External audit firms or independent assessors can be engaged to evaluate the organisation's compliance with relevant standards, regulations, or industry best practices.
    b. External audits provide an objective assessment of the organisation's controls and compliance with external requirements.
    c. External auditors may review the organisation's policies, procedures, and controls, and assess their effectiveness in achieving the desired objectives.
    d. External audits can also provide an independent assessment of the organisation's data privacy and protection practices, including compliance with applicable privacy laws and regulations.
3. Manual audits of controls:
    a. Manual audits of controls involve conducting specific assessments of individual controls and processes.
    b. These audits can be performed by designated individuals or teams responsible for managing specific controls, such as access control, financial audits, network security, or data privacy.
    c. Manual audits assess the adequacy and effectiveness of controls, identify any deviations or non-compliance, and recommend corrective actions.
    d. The audits can be conducted through interviews, documentation review, observations, and testing of control effectiveness.
    e. Manual audits help ensure that controls are properly implemented, monitored, and aligned with the policy's requirements.
4. Key considerations:
    a. Monitoring and evaluation efforts should be based on a well-defined audit plan or schedule to ensure regular assessments of different aspects of the policy.
    b. The results of audits, both internal and external, should be documented and shared with relevant stakeholders, such as senior management.
    c. Identified gaps or non-compliance should be addressed through corrective actions and follow-up audits to verify the effectiveness of remedial measures.
    d. Monitoring and evaluation processes should be adaptable to changes in the organisation's environment, emerging threats, and evolving requirements.
    e. It is important to ensure that auditors and assessors possess the necessary expertise and knowledge to effectively evaluate the policy and associated controls.

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## Review

To ensure the policy remains up-to-date, effective, and aligned with organisational goals, feedback, review, and periodic revisions should be incorporated into the policy management process. Here are mechanisms that can be implemented for these purposes:

1. Feedback mechanisms:
    a. Establish a designated point of contact to receive feedback and suggestions regarding the policy.
    b. Encourage stakeholders to provide feedback through various channels, such as a designated email address, feedback forms, or an anonymous reporting system.
    c. Conduct surveys or focus group discussions to gather insights and perspectives from employees, management, and other stakeholders.
    d. Establish a culture of open communication and encourage stakeholders to proactively raise concerns or provide suggestions related to the policy.
2. Periodic review:
    a. Define a timeline or schedule for conducting periodic reviews of the policy. The frequency may vary depending on the organisation's needs, but typically ranges from annually to biennially.
    b. Form a review committee consisting of representatives from relevant departments, such as information security, HR, technology, legal, compliance, and risk management, to conduct the policy review.
    c. During the review, assess the policy's alignment with emerging threats, changes in regulatory requirements, technological advancements, and lessons learned from incidents or audits.
    d. Solicit feedback from stakeholders during the review process to gather insights on the policy's strengths, weaknesses, and areas for improvement.
    e. Evaluate the policy against industry best practices, standards, and guidelines to ensure its relevance and effectiveness.
3. Revisions and updates:
    a. Based on the feedback and findings from the review process, initiate the necessary revisions and updates to the policy.
    b. Clearly document all changes made to the policy, including the rationale and considerations behind each revision.
    c. Ensure that the revised policy reflects the latest best practices, addresses identified gaps or weaknesses, and incorporates new legal or regulatory requirements.
    d. Communicate the revisions to all stakeholders through appropriate channels, such as internal newsletters, email communications, or training sessions.
    e. Ensure that stakeholders have access to the updated policy document and are aware of the changes made.

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4. Training and awareness:
    a. Conduct training sessions or awareness programs to educate employees and stakeholders about the revised policy and its implications.
    b. Highlight the changes made, the reasons behind the revisions, and any new responsibilities or requirements resulting from the updated policy.
    c. Reinforce the importance of adhering to the policy and provide guidance on how to comply with the revised guidelines.
    d. Offer refresher training periodically to reinforce key policy concepts and maintain awareness among stakeholders.

# Conclusion

In conclusion, our CSR policy demonstrates our commitment to ethical practices, environmental sustainability, employee well-being, and community engagement. We aim to promote integrity, comply with laws, prevent corruption, protect human rights, and minimise our environmental footprint. Our policy prioritises employee health, safety, equal opportunities, and development. We support communities through local initiatives, volunteering, and stakeholder engagement.

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