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ESG - POLICY MANUAL

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	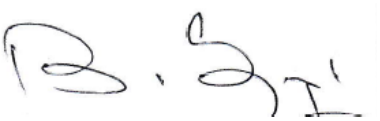	
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1. EMPLOYEES HEALTH AND SAFETY POLICY

NAP/ESG/PY/01

1. Introduction

NAP committed to upholding a safe, healthy, and supportive work environment for all employees, contractors, and visitors. We recognize that effective health and safety management is essential not only for compliance but for fostering a productive, engaged, and empowered workforce. This policy outlines the responsibilities, procedures, and quantitative goals necessary to ensure a robust health and safety culture in alignment with our ESG principles.

2. Scope

This Employee Health & Safety Policy at NAP applies to all employees, contractors, and visitors across all locations and operations. It covers comprehensive workplace safety measures, including hazard identification, risk management, and safe equipment operation. The policy promotes physical well-being with ergonomic workstations, health checks, and safe handling procedures, and supports mental health with Employee Assistance Programs, counselling, and stress management. Emergency preparedness, including drills and medical support, ensures quick response to crises. Continuous training, monitoring, and reporting maintain awareness and compliance, with regular audits and data analysis to drive on-going improvements in health and safety practices.

3. Roles and Responsibilities

3.1. Management Responsibilities

NAP demonstrates a firm commitment to employee health and safety through strong leadership, regular risk management, and compliance oversight. Leadership actively promotes a safe work culture, ensuring that health and safety remain a top priority across all levels. Workplace hazards are identified, evaluated, and mitigated through systematic risk assessments and safety audits. Adequate resources—financial, technical, and human—are dedicated to maintain effective safety standards. Compliance with local regulations, industry standards, and internal policies is strictly overseen. Furthermore, tailored health and safety training is provided to all employees, ensuring skills are continually developed to meet department-specific needs.

3.2. Supervisors' Responsibilities

NAP prioritizes strict implementation of health and safety protocols, requiring employees to consistently use personal protective equipment (PPE) and adhere to safety guidelines. Employees are encouraged to promptly report any incidents, near-misses, or unsafe conditions, enabling proactive safety improvements. Daily oversight is conducted to ensure compliance with health and safety standards, with immediate corrective actions taken to address any hazards. Emergency preparedness is maintained through clear response procedures, ensuring that all employees are familiar with evacuation routes and protocols. This approach fosters a safe workplace environment, reducing risks and enhancing overall employee safety.

3.3. Employee Responsibilities

At NAP every employee has a responsibility to maintain personal safety by strictly following all safety guidelines, correctly using personal protective equipment (PPE), and promptly reporting any unsafe conditions. Active engagement in health and safety training, drills, and other programs is essential, as these initiatives enhance awareness and preparedness. Employees also have a duty to support their colleagues by ensuring their actions do not put others at risk and by helping peers uphold safety standards. This collective commitment fosters a safe, secure, and supportive work environment for everyone, reinforcing the company's dedication to health and safety.

3.4. Health & Safety Committee

At NAP incident review processes involve analysing data to identify trends and root causes, enabling the proposal of effective corrective measures to prevent future occurrences. This proactive approach not only enhances workplace safety but also fosters a culture of continuous improvement. Additionally, the health and safety policy undergoes an annual review to ensure it remains current and effective. This review incorporates new regulations, employee feedback, and advancements in safety practices, ensuring that the policy reflects the latest standards and best practices. By maintaining an adaptive policy, the company demonstrates its Ongoing commitment to employee health and safety.

4. Employees Health and Safety Policy

4.1. Safety at Work

NAP prioritizes safety through regular risk assessments to identify and mitigate hazards related to machinery, chemical handling, and production processes. Appropriate personal protective equipment (PPE) is provided and its mandatory use is enforced, ensuring employees are equipped with gloves, masks, helmets, and safety goggles as required. Safe machinery operation is emphasized by maintaining equipment per manufacturer specifications and providing comprehensive training on proper usage to all employees.

Additionally, clear emergency protocols are established for scenarios such as fires, chemical spills, and medical crises, complemented by frequent drills to ensure all personnel are prepared and ready to respond effectively in emergencies.

4.2. Physical Health at Work

NAP Emphasizes ergonomic support by conducting assessments for all employees to optimize workstation setups, minimizing strain and preventing musculoskeletal injuries. Regular health checks are provided, focusing on respiratory health, cardiovascular well-being, and overall fitness to ensure early detection of potential health issues. Furthermore, the company offers training on safe work practices, including safe lifting techniques and ergonomic best practices, to significantly reduce the risk of injuries. By prioritizing these initiatives, NAP fosters a healthier and safer workplace, enhancing employee well-being and productivity while actively promoting a culture of safety and care.

4.3. Psychological Health at Work and Stress Prevention

NAP is committed to promoting employee well-being through various initiatives aimed at enhancing work-life balance. Flexible work schedules are implemented, and workloads are clearly defined to help minimize stress and prevent burnout. The Employee Assistance Program (EAP) offers confidential counseling services, supporting employees in managing stress, anxiety, and personal challenges effectively. Additionally, mental health training is provided through workshops focused on stress management, resilience, and mental health awareness. By prioritizing these programs, NAP fosters a supportive work environment, empowering employees to maintain their mental health and achieve a balanced lifestyle.

4.4. Health & Safety Communication and Training

At NAP all new employees undergo mandatory on boarding training that covers essential health and safety protocols as part of their induction process, ensuring they are equipped with the necessary knowledge from day one. To reinforce these standards, annual refresher training is conducted, keeping safety practices at the forefront of employees' minds. Additionally, the company regularly conducts safety drills and simulations, such as fire drills, to familiarize staff with emergency procedures and response protocols. These initiatives collectively foster a culture of safety, enhancing preparedness and promoting a secure working environment for all employees.

4.5. Monitoring and Review

NAP maintains a robust incident reporting system to document all incidents, including near-misses, which are thoroughly analysed and reviewed to identify trends and opportunities for improvement. The Health & Safety Committee conducts regular audits to evaluate compliance with established health and safety standards, ensuring continuous adherence and enhancement of safety protocols. Additionally, a feedback mechanism is in place to actively solicit input from employees through surveys, suggestion boxes, and direct communication with the Health & Safety Committee. This inclusive approach fosters a culture of safety and continuous improvement, empowering employees to contribute to a safer workplace environment.

4.6. Workplace Safety

NAP is committed to maintaining a safe and secure work environment for all employees. Regular safety audits, hazard assessments, and the implementation of necessary safety equipment are mandatory. Employees are trained on recognizing potential hazards and following standard operating procedures. Immediate reporting of unsafe conditions is encouraged, and corrective actions are taken swiftly to minimize risks. The company ensures that all safety regulations are adhered to and that safety is prioritized in daily operations.

4.7. Emergency Procedures

NAP has established clear emergency procedures to address potential accidents or incidents. This includes the availability of emergency exits, first aid kits, and clearly marked fire extinguishers throughout the facility. Employees receive regular training on emergency response protocols, such as evacuation drills and fire safety. In case of an emergency, employees are expected to act calmly and follow the procedures outlined in the emergency plan to ensure their safety and the safety of others.

4.8. Health and Well-being Programs

The company promotes employee health and well-being through regular health screenings, wellness programs, and mental health support services. On-site health facilities and access to counseling services are provided to assist employees in managing stress, mental health, and physical health issues. NAP encourages employees to engage in healthy lifestyle practices and offers resources for nutrition, fitness, and work-life balance. The company ensures that employees have access to necessary support to maintain their overall well-being.

4.9. Personal Protective Equipment (PPE)

NAP ensures that all employees are equipped with the appropriate Personal Protective Equipment (PPE) based on their specific job roles. This includes safety gloves, helmets, eye protection, and any other necessary equipment to minimize exposure to hazards. PPE training is provided to all employees to ensure proper use, maintenance, and replacement of safety gear. Regular checks are carried out to ensure compliance, and any PPE deficiencies are addressed promptly to guarantee maximum protection for the workforce.

4.10. Mental Health Support

NAP recognizes the importance of mental health in the workplace and provides various resources to support employees in managing stress, anxiety, and other mental health challenges. Confidential counseling services and support hotlines are available, ensuring employees have a safe space to discuss any issues. Training programs are conducted to raise awareness about mental health, reduce stigma, and encourage employees to seek help when needed. The company fosters a supportive culture to promote mental well-being among all employees.

5. Quantitative Objectives and Targets

Objective	Qualitative Objective	Unit of Measure	Target Value
1. Reduce Incident Rate	Minimize reportable incidents through training and preventive measures	Incident rate per 100 employees	1 per year
2. Comprehensive Ergonomic Assessments	Ensure all employees receive an ergonomic assessment annually	Percentage of employees assessed	Maintaining 100% Organized
3. Mental Health Program Utilization	Increase employee engagement with mental health resources	Percentage of employees using EAP	30% increase over previous year
4. Regular Safety Training Completion	Ensure all employees complete mandatory safety training	Percentage of employees trained	Maintaining 100% Organized
5. Safety Drill Participation	Conduct quarterly drills with full employee participation	Number of drills per year	4 drills annually

6. Distribution

The Employee Health & Safety Policy at NAP is readily accessible to all employees through multiple channels. It is available digitally on the company's internal network under the "Employee Resources" section, ensuring easy access for all staff. Hard copies of the policy are prominently posted in common areas, such as the break room and production floor, and are also available through the HR department for those who prefer physical documentation. Furthermore, all new hires will review this policy during their on boarding process to ensure thorough understanding and compliance, reinforcing the company's commitment to a safe working environment.

7. Annual Review

NAP is dedicated to continuous improvement in employee health and safety through several key initiatives. The policy will be updated regularly to reflect any changes in health and safety regulations, ensuring compliance and relevance. Incident analysis will be conducted to review workplace incidents and trends, allowing the identification of opportunities for improvement. Employee feedback is actively sought through suggestions and comments to enhance health and safety practices within the organization. Additionally, the company will incorporate technological advancements and innovations that can further reduce risks, ensuring a proactive approach to maintaining a safe and healthy work environment for all employees.

8. Conclusion

NAP's commitment to employee health and safety is central to our operations and reflects our dedication to responsible, sustainable practices. By implementing this policy, we aim to foster a proactive culture where health and safety are prioritized, risks are managed, and continuous improvement is pursued. We expect every employee, from management to operations, to actively participate in this commitment, contributing to a safe and healthy workplace for all.

2. WORKING CONDITIONS POLICY

NAP/ESG/PY/02

1. Introduction

At NAP we are dedicated to fostering a safe, fair, and equitable working environment for all employees. This policy outlines our comprehensive approach to working conditions, emphasizing the importance of competitive wages, comprehensive benefits, reasonable working hours, and open channels for two-way communication regarding these aspects. We recognize that providing a supportive work environment is crucial to the well-being and productivity of our employees, which in turn enhances overall job satisfaction and morale. Our commitment extends to ensuring that all employees are fairly compensated for their work and have access to essential benefits that promote their health and financial security. We also prioritize work-life balance and respect for employees' time, including their right to disconnect outside of working hours. Through regular feedback mechanisms, we encourage employee engagement in discussions about working conditions, enabling us to continuously improve and adapt our policies to meet their needs effectively.

2. Scope

The Working Conditions Policy at NAP applies to all employees, including full-time, part-time, temporary, and contract staff across all locations. It covers key aspects such as fair wages, employee benefits, working hours, and mechanisms for two-way communication regarding working conditions. The policy ensures compliance with local and national labor laws while aligning with our commitment to ESG principles. It emphasizes a supportive workplace environment, encourages continuous improvement through employee feedback, and mandates training to inform employees about their rights and available resources, fostering overall employee well-being and satisfaction.

3. Roles and Responsibilities

3.1. Management Responsibilities

Leadership commitment at NAP is paramount in ensuring fair working conditions. Management is tasked with demonstrating this commitment through compliance with local labor laws and industry standards. Adequate resources will be allocated to implement and sustain fair wages and comprehensive benefits for all employees. Compliance monitoring will occur regularly to ensure adherence to labor laws and company policies, identifying areas for improvement and maintaining accountability.

Additionally, a robust feedback mechanism will be established, allowing employees to voice their concerns and suggestions regarding their working conditions, fostering an open and transparent workplace culture that prioritizes employee welfare.

3.2. Human Resources Responsibilities

Policy implementation at NAP involves ensuring the effective execution of this policy through regular training sessions that educate employees about their rights and benefits. The administration of wages and benefits will be managed meticulously to guarantee timely and accurate payroll processes, reflecting fair compensation practices. Additionally, we will facilitate two-way communication between employees and management regarding working conditions and any concerns they may have. This open dialogue encourages transparency, empowers employees to express their thoughts, and fosters a collaborative environment where feedback is valued, ultimately enhancing workplace satisfaction and commitment.

3.3. Employee Responsibilities

At NAP employee engagement is crucial in shaping positive working conditions. Employees are encouraged to actively participate in discussions regarding their working conditions and to provide feedback through established channels, such as suggestion boxes and regular meetings. This participation helps create a culture of collaboration and mutual respect. Additionally, employees should remain aware of their rights and the benefits available to them under this policy. Access to information about their entitlements empowers employees to advocate for themselves and contributes to a more informed and satisfied workforce, fostering a supportive work environment.

4. Working Conditions Policy

4.1. Wages

NAP is dedicated to ensuring fair compensation for all employees by providing wages that are competitive and compliant with applicable laws and regulations. We commit to regularly reviewing our compensation structure to ensure it aligns with industry standards. Transparency in wage determination is essential; therefore, employees will be informed about the criteria used for establishing wages, including job classifications and performance metrics. Furthermore, for employees required to work beyond their regular hours, we will ensure that overtime pay is provided in accordance with applicable laws and company policies, recognizing and rewarding their additional efforts.

4.2. Benefits

NAP is committed to the health and well-being of its employees by offering comprehensive health and wellness benefits, including medical, dental, and vision insurance, along with regular health check-ups. To support long-term financial security, we provide access to retirement savings plans, ensuring company contributions comply with statutory requirements. Employees are entitled to paid leave, encompassing vacation days, sick leave, and public holidays, in accordance with local regulations and company policies. Additionally, we recognize the importance of work-life balance by offering family benefits, including parental leave and childcare assistance, to support employees with family responsibilities.

4.3. Working Hours

At NAP we establish standard working hours in line with local labor laws, typically not exceeding 48 hours per week and 8 hours per day. We recognize the importance of flexibility in the workplace, offering arrangements such as staggered shifts and remote work options to meet employees' diverse needs while maintaining operational effectiveness. Additionally, we support the right to disconnect, encouraging employees to disengage from work-related communications outside of standard working hours. This commitment to flexibility and work-life balance aims to foster a healthier and more productive work environment for all employees.

4.4. Two-Way Communication on Working Conditions

NAP fosters an open-door policy that empowers employees to express concerns and suggestions about their working conditions freely, ensuring they do so without fear of retaliation. To facilitate on-going dialogue, management will conduct regular meetings with employees to discuss working conditions, gather valuable feedback, and address any emerging issues. Additionally, we will implement annual employee satisfaction surveys to evaluate perceptions of working conditions, enabling us to identify areas for improvement. This proactive approach to communication and feedback demonstrates our commitment to creating a supportive and responsive workplace culture.

4.5. Workplace Environment

NAP is dedicated to maintaining a clean, comfortable, and ergonomic workspace for all employees. The workplace is regularly inspected to ensure it is free from hazards, with appropriate lighting, ventilation, and temperature control. Employees are encouraged to provide feedback on their workspace conditions, and any necessary improvements are promptly implemented. The company ensures that all areas, including workstations, break rooms, and common areas, meet safety and comfort standards to support employee productivity and well-being.

4.6. Work Hours and Flexibility

NAP strives to offer flexible work schedules to accommodate employees' personal needs while ensuring operational efficiency. Standard working hours are clearly defined, with overtime paid in accordance with labor laws. The company recognizes the importance of work-life balance and offers flexible options where possible, such as remote work or adjusted shifts. Employees are encouraged to manage their time effectively and communicate their needs to supervisors to create a balanced and productive work environment.

4.7. Fair Compensation

NAP is committed to ensuring that all employees receive fair and competitive compensation for their work. Salaries are based on factors such as job responsibilities, experience, and market standards, ensuring equity across all levels. Regular reviews are conducted to maintain competitive compensation packages, which may include bonuses, benefits, and incentives. The company ensures compliance with labor laws and strives to offer compensation that supports employees' financial well-being and recognizes their contributions.

4.8. Health and Safety Standards

NAP adheres to strict health and safety regulations to ensure the protection of all employees in the workplace. This includes providing personal protective equipment (PPE), conducting regular safety audits, and maintaining a safe environment free from hazards. Employees are trained in safety procedures and emergency protocols, and health checks are regularly carried out. The company encourages open communication about safety concerns and ensures prompt action is taken to mitigate any identified risks or hazards.

4.9. Non-Discrimination and Equal Opportunity

NAP is committed to providing a work environment where all employees are treated fairly, regardless of race, gender, age, disability, or other protected characteristics. The company ensures that all hiring, promotion, and compensation decisions are made based on merit and skills. Discrimination or harassment of any kind is strictly prohibited. NAP promotes diversity and inclusivity within the workforce and provides equal opportunities for career growth and development to all employees.

4.10. Employee Development and Training

NAP believes in the continuous professional development of its employees. The company offers various training and development programs designed to enhance employees' skills, knowledge, and career advancement. Regular performance reviews are conducted to identify training needs, and opportunities for further education and skill development are provided.

The company supports employees in attending workshops, seminars, and certifications to improve their professional capabilities and contribute to both personal and organizational growth.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Achieve 90% employee satisfaction with wages	Employee satisfaction survey	90% satisfaction rate
Ensure 100% compliance with local labor laws	Compliance audit	Maintaining 100% Organized
Provide at least 15 paid leave days annually	Policy documentation	15 days per employee
Conduct annual employee satisfaction surveys	Number of surveys conducted	1 survey per year
Achieve a 70% participation rate in feedback mechanisms	Participation rate	70% of employees participating

6. Distribution

This Working Conditions Policy will be distributed to all employees via the company's internal network, with hard copies posted in common areas for easy access. New employees will receive a copy during their on boarding process to ensure they are informed of their rights and benefits from the outset. The Human Resources Department will conduct an annual review of the policy to assess its relevance and effectiveness. This review will incorporate regulatory updates, employee feedback, and industry best practices to ensure the policy remains aligned with our commitment to providing a fair and equitable working environment.

7. Annual Review

The Annual Review of the Working Conditions Policy at NAP is a systematic process conducted each year to ensure the policy remains relevant, effective, and compliant with current labor laws and industry standards. This review involves analysing feedback collected from employee satisfaction surveys, incident reports, and suggestions submitted through communication channels. Additionally, the review assesses any changes in regulations that may impact wages, benefits, and working hours. The Health and Safety Committee, in collaboration with Human Resources, will evaluate the effectiveness of current practices and recommend necessary adjustments to enhance employee welfare. Key performance indicators (KPIs) will be utilized to measure the success of implemented initiatives, such as employee retention rates and satisfaction levels.

Following the review, findings and revisions will be communicated to all employees, ensuring transparency and fostering a culture of continuous improvement. This proactive approach reinforces our commitment to providing a supportive and equitable working environment for all staff members.

8. Conclusion

The Working Conditions Policy at NAP underscores our dedication to creating a safe, fair, and positive work environment for all employees. By prioritizing fair wages, comprehensive benefits, reasonable working hours, and open channels of communication, we aim to enhance employee satisfaction, well-being, and productivity. This policy serves as a foundation for fostering a supportive workplace culture, which is crucial for achieving our overall business goals. Our commitment to these principles not only benefits our employees but also drives the long-term success and sustainability of our organization.

3. LABOR RELATIONS POLICY

NAP/ESG/PY/03

1. Introduction

At NAP, we recognize the importance of fostering positive labor relations as a cornerstone of our commitment to employee welfare and organizational success. This policy outlines our approach to structured relations with employee representatives and trade unions, emphasizing collaboration, transparency, and mutual respect. By promoting open dialogue and collective bargaining, we aim to create a supportive environment where employees feel valued and heard. Our goal is to strengthen partnerships with employee representatives, ensuring that their insights contribute to decision-making processes, ultimately enhancing workplace satisfaction and productivity while aligning with our broader mission of sustainable and responsible business practices.

2. Scope

This policy is applicable to all employees of NAP, encompassing management and supervisory staff. It addresses various aspects of labor relations, including collective bargaining, effective communication, and collaboration with recognized employee representatives and trade unions. The aim is to foster a constructive environment where employee voices are valued, and their rights are protected. Through open dialogue and engagement with employee representatives, NAP commits to maintaining fair working conditions and promoting a positive workplace culture that enhances employee satisfaction and productivity. All employees are encouraged to participate actively in these processes.

3. Roles and Responsibilities

3.1. Management Responsibilities

NAP is committed to fostering a positive labor relations environment through open dialogue and collaboration with employee representatives and trade unions. Management will prioritize transparency in discussions, ensuring that all voices are heard and valued. Necessary resources will be allocated to support labor relations activities, including training for both management and representatives to enhance communication skills. Compliance with local labor laws and regulations will be closely monitored to uphold fair practices. Additionally, a supportive culture will be promoted, encouraging employee feedback and constructive engagement, ultimately strengthening the relationship between employees and management for a more harmonious workplace.

3.2. Employee Representatives' Responsibilities

Employee representatives play a crucial role in fostering effective labor relations at NAP . They will represent employees' interests during discussions with management, ensuring that concerns and suggestions are communicated clearly and effectively. Maintaining open lines of communication between employees and management is vital, with representatives providing updates on negotiations and any policy changes. They will also gather feedback from employees regarding labor relations issues, workplace conditions, and management practices, presenting this information to management for consideration. Additionally, representatives are encouraged to participate in training programs that enhance their negotiation skills and deepen their understanding of labor laws and employee rights.

3.3. Trade Union Responsibilities

Employee representatives at NAP will actively engage in collective bargaining on behalf of employees, advocating for fair wages, benefits, and improved working conditions. They will represent employees during grievance procedures and disputes, ensuring that their rights are protected in accordance with applicable laws and regulations. Furthermore, representatives will collaborate with management to foster workplace harmony, addressing potential issues proactively to prevent escalation. This collaborative approach aims to create a positive work environment where employee voices are heard, and mutual respect between employees and management is maintained. By working together, we can enhance employee satisfaction and organizational effectiveness.

4. Labor Relations Policy

4.1. Structured Relations with Employee Representatives and Trade Unions

NAP recognizes the essential role of employee representatives and trade unions in advocating for employee interests. We are committed to engaging in collective bargaining on wages, benefits, and working conditions, ensuring that negotiations are fair, transparent, and respectful. Regular meetings will be held with representatives and unions to discuss on-going labor relations and workplace concerns, with documented minutes shared among all parties. We will maintain an accessible grievance procedure, involving representatives in the resolution process to ensure employees' voices are heard. Additionally, training will be provided for both management and representatives on labor relations best practices, negotiation skills, and conflict resolution, fostering mutual understanding and effective communication.

4.2. Commitment to Fair Labor Practices

NAP is dedicated to maintaining fair labor practices in accordance with all applicable laws and standards. We prioritize the prevention of discrimination and the promotion of diversity within our workforce, fostering an inclusive environment where every employee feels valued and respected. Additionally, we are committed to ensuring a safe and healthy work environment, implementing necessary measures to protect the well-being of all employees. Through our adherence to these principles, we aim to cultivate a workplace that supports individual rights and encourages collaboration, ultimately contributing to the overall success of our organization.

4.3. Employee Engagement and Feedback Mechanism

NAP will establish multiple mechanisms for employees to share their feedback on labor relations issues, ensuring that their voices are heard and considered in decision-making processes. This includes the implementation of anonymous surveys and suggestion boxes located throughout the workplace. These tools will allow employees to express their concerns, suggestions, and experiences regarding labor relations without fear of retribution. Management will regularly review the collected feedback to identify trends and areas for improvement, using this information to enhance working conditions and foster a more collaborative and supportive work environment for all employees.

4.4. Employee Representation

NAP respects the right of employees to form and join labor unions or other representative bodies. The company fosters open communication channels between management and employee representatives to ensure all concerns are heard. Regular meetings are held to discuss work-related issues, grievances, and suggestions, with the goal of promoting mutual understanding. Employee representatives are encouraged to collaborate with management in decision-making processes that affect the workforce, fostering a healthy and cooperative work environment.

4.5. Conflict Resolution

NAP is committed to resolving conflicts swiftly and fairly. The company has established formal procedures for addressing employee grievances, including a step-by-step escalation process. Employees are encouraged to bring concerns to their managers, and if unresolved, the issue can be taken to HR or a designated mediator. Both employees and management are expected to approach conflicts professionally and respectfully, with a focus on finding mutually beneficial solutions that maintain a positive working relationship.

4.6. Fair Treatment and Non-Discrimination

NAP ensures fair treatment for all employees, regardless of their background, gender, race, or other characteristics. The company enforces policies that prohibit any form of discrimination or harassment in the workplace. Equal opportunity is provided in hiring, promotion, and training, ensuring that all employees have access to career advancement and are treated respectfully and equitably. Any incidents of unfair treatment are investigated and addressed in accordance with company policies and legal requirements.

4.7. Workplace Safety and Health

NAP is dedicated to providing a safe and healthy working environment for all employees. The company strictly adheres to local health and safety regulations and ensures that all workplace safety standards are met. Employees are trained on health and safety practices, and any unsafe conditions or practices are promptly addressed. The company also supports employees' mental health by providing resources and support systems to help manage workplace stress and maintain a healthy work-life balance.

4.8. Employee Engagement

NAP values employee input and actively encourages participation in decisions that affect their work and environment. The company regularly conducts employee surveys, feedback sessions, and team meetings to assess job satisfaction and gather suggestions for improvement. Employees are empowered to take an active role in shaping workplace culture and practices, and their contributions are recognized. Employee engagement initiatives foster a sense of ownership, pride, and commitment to the company's mission and goals.

4.9. Compliance with Labor Laws

NAP ensures full compliance with all applicable labor laws and regulations. The company regularly reviews national and international labor standards to ensure that all practices align with legal requirements. This includes proper documentation of work hours, payment of overtime, and adherence to leave policies. The company also complies with regulations regarding workplace health and safety, non-discrimination, and employee rights, ensuring that all employees are treated in accordance with the law.

4.10. Work-Life Balance

NAP is committed to supporting a healthy work-life balance for all employees. The company offers flexible working hours, paid time off, and various leave options to allow employees to manage personal responsibilities alongside work commitments. By promoting balance, the company ensures that employees are well-rested, motivated, and productive.

The organization understands that personal well-being contributes to job satisfaction and encourages employees to take advantage of available benefits to maintain a positive balance between their professional and personal lives.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Increase participation in labor relations meetings	Percentage of Employees	80% participation annually
Timely resolution of grievances	Average Resolution Time (days)	30 days for 90% of grievances
Employee satisfaction with labor relations	Satisfaction Score (scale of 1-5)	Average score of 4 or higher
Frequency of collective bargaining sessions	Number of Sessions Annually	Minimum of 4 sessions annually
Training completion rate for management and representatives	Percentage of Participants	Maintaining 100% Organized

6. Distribution

The Labor Relations Policy will be distributed to all employees of NAP through various internal communication channels, including emails and postings on the employee portal. Additionally, hard copies will be made available in common areas such as break rooms, the Human Resources office, and other accessible locations to ensure visibility. To ensure all staff members are well-informed, new employees will receive a copy of this policy during their on-boarding process, allowing them to understand the company's labor relations practices from the outset. This approach promotes transparency and ensures that all employees are aware of their rights and the processes available for engaging in labor relations within the organization.

7. Annual Review

The Labor Relations Policy will undergo an annual review conducted by the Human Resources Department in collaboration with management and employee representatives. This review process aims to evaluate the policy's effectiveness, pinpoint areas needing improvement, and incorporate valuable feedback from employees and trade unions. Based on the findings, necessary adjustments will be made to ensure the policy remains relevant and effective.

Any changes to the policy will be communicated promptly to all employees through established communication channels. Furthermore, training sessions will be organized as needed to ensure that employees understand and comply with the revisions, reinforcing our commitment to maintaining positive labor relations and fostering a supportive work environment.

8. Conclusion

NAP is committed to fostering structured labor relations that emphasize fairness, transparency, and collaboration between management and employees. By actively engaging with employee representatives and trade unions, the company seeks to cultivate a positive working environment that enhances employee satisfaction and overall productivity. This Labor Relations Policy establishes a solid foundation for our dedication to effective communication, negotiation, and continuous improvement in labor relations practices. We recognize that strong labor relations are essential for maintaining a harmonious workplace, and we are dedicated to upholding the rights and interests of all employees while ensuring compliance with relevant laws and regulations.

4. CAREER MANAGEMENT POLICY
NAP/ESG/PY/04

1. Introduction

At NAP, we recognize that our employees are our most valuable asset. To support their growth and development, we are committed to providing a comprehensive career management framework. This includes transparent recruitment processes, on-going training programs, and opportunities for career advancement. By investing in our employees' professional development, we enhance not only individual capabilities but also the overall performance of our organiz2ation.

2. Scope

This Career Management Policy applies to all employees of NAP , encompassing management, supervisory staff, and all levels of employees engaged in recruitment, training, and career development activities. It is designed to guide the organization's approach to attracting, developing, and retaining talent while ensuring equitable access to opportunities for professional growth. The policy outlines the processes and responsibilities involved in recruitment, training initiatives, and career advancement pathways, fostering an environment that values continuous learning and employee engagement. By implementing this policy, NAP aims to create a supportive framework that empowers employees to achieve their career goals while aligning with the company's overall mission and objectives.

3. Roles and Responsibilities

3.1. Management Responsibilities

Senior management at NAP is committed to advancing career management practices and actively supports the implementation of this policy. To ensure the success of these initiatives, the company will allocate the necessary resources for training and development programs aimed at fostering employee growth. Furthermore, the effectiveness of career management practices will be regularly monitored and evaluated, with adjustments made based on employee feedback and performance metrics. This commitment to continuous improvement underscores the company's dedication to providing a supportive environment that encourages professional development and aligns with organizational goals.

3.2. Human Resources Responsibilities

NAP is committed to effective recruitment management by overseeing the entire recruitment process to ensure alignment with the company's strategic goals and values. The organization will develop, implement, and maintain comprehensive training programs tailored to enhance the skills of employees, fostering a culture of continuous learning. Additionally, collaboration with employees will be emphasized in creating individual development plans that not only reflect their career aspirations but also meet the organization's needs. This holistic approach ensures that recruitment, training, and career development efforts work in tandem to support both employee growth and the company's long-term objectives.

3.3. Employee Responsibilities

Employees at NAP are encouraged to take an active role in their career development by engaging in available training programs, seeking constructive feedback, and setting personal career goals. Maintaining open lines of communication with supervisors and the HR department is essential for discussing career aspirations, identifying training needs, and exploring development opportunities. This collaborative approach fosters a supportive environment where employees feel empowered to navigate their career paths effectively while aligning their personal growth with the company's objectives. By encouraging active participation and communication, NAP aims to create a workforce that is motivated, skilled, and aligned with the organization's vision.

4. Career Management Policy

4.1. Recruitment Strategy

NAP is dedicated to maintaining a transparent and equitable recruitment process aimed at attracting qualified candidates who resonate with the company's values and culture. The recruitment strategy will prioritize diversity and inclusion, ensuring a broad pool of applicants from various backgrounds. By utilizing various sourcing methods, including online job boards, social media, and networking events, we aim to engage talent that possesses the skills and potential to contribute to our organization. Our commitment to fairness and respect throughout the recruitment process ensures that every candidate is evaluated based on their qualifications and suitability for the role.

4.2. Job Postings

All job openings at NAP will be advertised both internally and externally to ensure a wide reach and attract diverse talent. Internal candidates will be actively encouraged to apply for promotions and new positions, fostering a culture of career mobility within the organization. This approach not only helps retain talent but also empowers employees to pursue growth opportunities aligned with their career aspirations.

By promoting transparency in the recruitment process, we aim to create an inclusive environment where all employees feel valued and motivated to advance within the company while attracting external candidates who share our values.

4.3. Selection Process

The selection process at NAP will be structured and standardized to ensure fairness and objectivity. It will begin with a thorough review of resumes to shortlist qualified candidates, followed by a series of interviews to assess their fit for the role and the company culture. Additionally, relevant assessment tools may be utilized to evaluate candidates' skills and competencies effectively. This systematic approach not only helps identify the most suitable candidates but also promotes transparency and consistency in the hiring process, ensuring that all applicants are evaluated based on merit and alignment with our organizational values.

4.4. On boarding

NAP will implement a thorough on boarding program designed to help new hires smoothly transition into their roles and become acquainted with company policies, procedures, and culture. This program will cover essential topics such as health and safety standards, company values, operational procedures, and role-specific expectations. New employees will receive guidance from supervisors and mentors, providing a support system for questions and concerns. Through this structured approach, NAP aims to set clear expectations, enhance engagement, and empower new hires to contribute confidently and effectively to the company’s goals from the start.

4.5. Career Development and Growth Opportunities

NAP is committed to providing employees with ample opportunities for career development and growth. The company offers training programs, workshops, and mentoring to help employees acquire new skills and advance in their careers. Employees are encouraged to set career goals, participate in professional development activities, and explore internal job openings. By promoting continuous learning, the company ensures that its workforce remains competitive, motivated, and well-equipped to take on new challenges and responsibilities within the organization.

4.6. Promotions and Internal Mobility

NAP believes in promoting from within and providing employees with opportunities for internal mobility. Employees who demonstrate strong performance, leadership potential, and alignment with company values are considered for promotions and lateral transfers.

The company fosters a culture of internal mobility by encouraging employees to explore new roles and career paths that align with their skills and interests. This approach not only supports career progression but also helps retain talented employees by offering them growth and varied experiences within the company.

4.7. Performance Reviews and Feedback

Performance reviews at NAP are conducted regularly to assess employees' progress and provide constructive feedback. These reviews are designed to recognize achievements, identify areas for improvement, and set future development goals. Employees receive feedback on their job performance and contributions, as well as guidance on how to enhance their skills and achieve career objectives. The process is transparent, with open communication between employees and managers, ensuring that performance evaluations are fair and aligned with career advancement opportunities.

4.8. Training and Skill Development

NAP invests in on-going training and skill development to ensure employees remain proficient in their roles and stay updated on industry trends. The company offers both in-house and external training programs tailored to employees' individual needs and career goals. These programs include technical training, leadership development, and soft skills workshops. By fostering a culture of learning, the company helps employees enhance their capabilities, ensuring they are well-equipped to meet business objectives and remain competitive in their respective fields.

4.9. Succession Planning

NAP implements a robust succession planning process to identify and prepare future leaders within the organization. Through mentorship, leadership development programs, and strategic talent identification, the company ensures that high-potential employees are groomed for leadership roles. Succession planning also involves evaluating employees' career aspirations and aligning them with organizational needs. This proactive approach ensures a smooth transition for key roles, maintains continuity in leadership, and provides employees with clear pathways to advance their careers within the company.

4.10. Work-Life Balance and Career Satisfaction

NAP recognizes the importance of work-life balance in ensuring career satisfaction and employee well-being. The company offers flexible working hours, paid time off, and opportunities for remote work to support employees in balancing personal and professional commitments. By promoting a healthy work-life balance, NAP helps employees reduce stress and increase job satisfaction, which ultimately leads to better career performance and retention. The company believes that employees who feel supported in their personal lives are more engaged and productive at work.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Increase the percentage of positions filled internally	Percentage of internal hires	3 15% increase in internal hires by the end of the fiscal year.
Achieve an employee training participation rate of 80%	Percentage of employees participating in training programs	80% participation in training programs by year-end.
Increase employee satisfaction with career development opportunities to 75%	Percentage of employees satisfied with career development opportunities	75% positive responses in the survey.
Ensure 100% of employees have an Individual Development Plan (IDP)	Percentage of employees with IDPs	Maintaining 100% Organized
Increase the number of employees participating in mentoring programs by 20%	Percentage increase in mentoring program participation	20% increase in participation in mentoring programs each year.

6. Distribution

The Career Management Policy at NAP will be accessible to all employees through multiple channels. It will be uploaded to the company's intranet for easy reference and shared via email, along with summary highlighting key aspects. As part of the on-boarding process, new employees will receive a copy to familiarize them with the company's commitment to career development. Hard copies will also be available in common areas, including break rooms and the Human Resources office, ensuring that all employees can review the policy at their convenience, fostering awareness and engagement across the organization.

7. Annual Review

The effectiveness of NAP's Career Management Policy will be regularly assessed through employee feedback and performance metrics, helping to gauge progress toward meeting its objectives. Feedback on recruitment, training, and career development experiences will be collected to identify areas for improvement. The policy will be updated as needed to reflect changes in legislation, industry best practices, and organizational goals. Any revisions will be communicated to all employees, with accompanying training sessions to ensure that all staff members understand and comply with the updated guidelines, fostering continuous improvement in career management practices.

8. Conclusion

NAP is dedicated to fostering an environment that supports the career growth and development of all employees. By implementing this Career Management Policy, we aim to create a culture of continuous learning, professional development, and career advancement. We believe that investing in our employees' careers not only enhances individual capabilities but also contributes to the overall success of our organization and our commitment to integrating Environmental, Social, and Governance (ESG) principles into our operations. This policy will serve as a guiding framework for managing recruitment, training, and career development at NAP, ensuring that all employees are equipped with the skills and opportunities necessary to thrive in their careers.

5. CHILD AND FORCED LABOR

NAP/ESG/PY/05

1. Introduction

NAP is committed to upholding the highest ethical standards in its operations, including the prevention of child and forced labor. As a responsible manufacturer of plastic injection moulded components and assemblies, we prioritize fair and transparent labor practices that align with our ESG goals. This policy underscores our commitment to ensuring a safe, equitable workplace, free from exploitation, by adhering to national and international labor laws. Through proactive engagement, employee training, and stringent supplier oversight, we aim to identify and prevent any instances of child or forced labor, promoting a respectful and sustainable work environment.

2. Scope

This policy applies to all operations, facilities, suppliers, and subcontractors of NAP, ensuring adherence to ethical labor standards across every level of the organization. It encompasses all aspects of employee recruitment, training, and monitoring practices to prevent and address child and forced labor. The policy is applicable to all management, supervisory staff, HR personnel responsible for recruitment, as well as procurement and supplier relations teams engaged in supply chain management. By extending its reach to both internal operations and external partners, NAP seeks to uphold the highest labor standards, ensuring ethical practices are embedded throughout the company's ecosystem.

3. Roles and Responsibilities

3.1. Senior Management:

Senior Management at NAP plays a critical role in ensuring the company adheres to anti-child and forced labor policies. They are responsible for allocating the necessary resources to implement and enforce these policies across the organization. This includes overseeing the development and enforcement of recruitment practices, training programs, and supplier engagements. Senior Management also sets the tone for the company's ethical labor standards by demonstrating a strong commitment to these principles, ensuring that all departments are aligned with the company's values and legal obligations. Their leadership ensures a workplace free from child and forced labor.

3.2. HR and Recruitment Team:

The HR and Recruitment Team at NAP is responsible for verifying the age of all new hires to ensure compliance with legal requirements regarding minimum working age. They uphold ethical recruitment practices by conducting thorough background checks to prevent child or forced labor. Additionally, the team monitors employment contracts to ensure they align with the company's anti-child and forced labor policies. Their role is crucial in maintaining a transparent and compliant recruitment process, supporting the company's commitment to ethical labor standards.

3.3. Procurement and Supplier Management:

The Procurement and Supplier Management team at NAP is responsible for ensuring that all suppliers adhere to the company's ethical labor standards, particularly regarding child and forced labor. They conduct regular audits to monitor compliance and assess suppliers' practices. When non-compliance is identified, the team implements corrective actions to address the issues, including working with suppliers to rectify any violations. Their efforts ensure that the company's supply chain maintains high ethical standards and aligns with NAP's commitment to fair labor practices.

3.4. Employees:

Employees at NAP play a crucial role in maintaining ethical labor practices by reporting any suspicious activities related to child or forced labor. They are encouraged to use the company's anonymous reporting channels to ensure that any violations are addressed promptly. Additionally, employees are required to participate in regular training sessions on ethical labor practices, helping them stay informed about company policies and their role in upholding NAP's commitment to a responsible and compliant workplace.

4. Child and Forced Labor Policy

4.1. Commitment to Ethical Labor Standards

NAP is dedicated to eradicating child and forced labor across its operations and supply chains. We fully comply with national and international labor laws, including the UN Global Compact, ILO conventions, and local Indian labor regulations. Our commitment ensures that no individual under the minimum legal working age is employed in any capacity, and no form of forced, compulsory, or bonded labor is utilized in any aspect of our business operations. This policy applies to all employees, contractors, and suppliers associated with the company.

4.2. Engagement with Suppliers and Third Parties

NAP requires all suppliers, contractors, and business partners to uphold ethical labor standards, prohibiting child and forced labor. We implement a stringent supplier code of conduct that mandates adherence to these standards. Regular supplier audits, self-assessments, and spot checks are conducted to ensure compliance. In cases of non-compliance, immediate corrective actions are taken, and repeated violations may result in the termination of business relationships. We work closely with suppliers to foster ethical labor practices throughout the supply chain.

4.3. Awareness and Training Programs

To prevent child and forced labor, NAP provides regular awareness training to employees, particularly those involved in recruitment, procurement, and supplier management. These training programs include understanding legal requirements, identifying signs of child or forced labor, and the importance of ethical recruitment. Additionally, annual workshops and e-learning modules are provided to ensure that employees remain informed of their responsibilities in maintaining ethical labor practices. Continuous education supports a proactive and vigilant workforce in safeguarding human rights.

4.4. Reporting Mechanisms and Zero-Tolerance Policy

NAP provides multiple confidential channels for employees, suppliers, and stakeholders to report suspected incidents of child or forced labor without fear of retaliation. The company upholds a zero-tolerance policy for retaliation against those who report violations in good faith. All reports are taken seriously and thoroughly investigated. Employees and external partners are encouraged to report suspicious activities through anonymous hotlines, email systems, or directly to management, ensuring prompt intervention when necessary to resolve potential violations.

4.5 Grievance Resolution and Corrective Actions

In cases where instances of child or forced labor are identified, NAP takes immediate action. This includes working with local authorities and organizations to address and resolve the issue. A clear, documented grievance resolution process is in place to ensure that all cases are investigated fairly and comprehensively. Corrective actions, such as remediation, compensation, and policy adjustments, are implemented as necessary. For severe violations, the company will terminate business relations with any partner found to be engaged in child or forced labor.

4.6. Annual Review and Continuous Improvement

The Human Resources and Compliance Departments will review this policy annually to evaluate its effectiveness in achieving the goals of eradicating child and forced labor. This review will include feedback from employees, stakeholders, and audits to assess compliance with legal and ethical labor standards. Updates and improvements to the policy will be made to reflect regulatory changes, emerging best practices, and organizational goals. All employees and relevant partners will be notified of any updates, and training will be provided to ensure continued adherence to the policy.

4.7. Prohibition of Child Labor

NAP strictly prohibits the use of child labor in any form within its operations, supply chains, and business activities. We adhere to local and international labor laws, including the International Labour Organization (ILO) standards, to ensure that no employee under the legal working age is employed. We are committed to safeguarding the rights of children by actively monitoring recruitment practices and conducting regular audits to prevent child labor. Any violation of this policy will result in immediate corrective actions, including termination of contracts with suppliers or partners engaged in such practices.

4.8. Prevention of Forced Labor

NAP is committed to maintaining a workplace free from forced labor, slavery, or human trafficking. We do not tolerate any form of involuntary labor, including workers being forced to work under threat or coercion. All employees must have the freedom to leave their employment without penalty, and their consent must be given freely for any work undertaken. The company ensures that no workers are subjected to physical, psychological, or financial coercion in the workplace. Strict controls and regular audits are in place to uphold this policy across our operations and supply chain.

4.9. Monitoring and Compliance

NAP implements a rigorous monitoring and compliance framework to prevent child and forced labor in its supply chains. This includes conducting regular audits and inspections of supplier practices, assessing labor conditions, and verifying employment documentation to ensure compliance with all applicable labor laws. We work closely with suppliers to address any issues identified, providing guidance on ethical labor practices. Suppliers are required to sign and adhere to a code of conduct that strictly prohibits the use of child and forced labor, and violations result in immediate corrective actions or termination of contracts.

4.10. Training and Awareness

NAP provides regular training and awareness programs for employees, managers, and suppliers to prevent child and forced labor. These programs educate stakeholders on recognizing the signs of child and forced labor, understanding their rights, and ensuring compliance with relevant laws and regulations. We aim to foster a culture of ethical responsibility by providing employees with the tools and knowledge to report any concerns related to labor practices confidentially. Training is conducted during employee onboarding and through on-going workshops, ensuring that all personnel are aware of the company's stance and obligations regarding labor rights.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Ensure 100% of suppliers complete ethical labor assessments annually	Percentage of suppliers assessed	Maintaining 100% Organized
Conduct employee training on child and forced labor prevention	Percentage of employees trained	90% participation in annual training sessions
Zero incidents of child or forced labor reported annually	Incident count	Target: 0 incidents across all operations
Complete annual internal audits to verify compliance	Number of audits completed	Maintaining 100% Organized
Conduct biannual supplier audits	Number of audits completed	At least two audits for each high-risk supplier

6. Distribution

The Child and Forced Labor Policy will be accessible on NAP's internal network through the company intranet, ensuring that all employees can review it easily. To reinforce awareness, all employees will receive a copy of the policy and a summary of its key points via email, facilitating a clear understanding across the organization. New hires will be introduced to the policy as part of their orientation program, fostering early alignment with our ethical labor standards. Additionally, excerpts from this policy are embedded within supplier contracts to clearly outline compliance expectations and reinforce our commitment to ethical practices within our supply chain. This integrated approach ensures that all employees, as well as external partners, are informed of and accountable to our standards for preventing child and forced labor.

7. Annual Review

The Human Resources and Compliance Departments will conduct an annual review of this Child and Forced Labor Policy. This review will evaluate the policy's effectiveness in achieving its objectives, taking into account feedback from employees, stakeholders, and any observed implementation challenges. Additionally, it will assess and incorporate necessary updates based on new labor regulations, evolving industry standards, or emerging best practices. Any changes made to the policy will be promptly communicated to all employees to maintain transparency. To ensure consistent understanding and compliance, training sessions will be organized for all staff, especially those in roles that directly affect recruitment, supplier management, or ethical compliance. This proactive approach ensures our policy remains relevant, effective, and aligned with NAP's commitment to ethical labor practices.

8. Conclusion

NAP is unwavering in its commitment to ethical labor practices, focusing on eradicating child and forced labor within its operations and across its supply chain. By implementing proactive measures, engaging with suppliers on compliance standards, and maintaining transparent reporting channels, we strive to foster a safe and respectful workplace. This policy underscores our dedication to creating fair and sustainable working conditions, aligning with international labor standards, and addressing labor rights with integrity and accountability. Through continuous oversight, employee training, and open communication, we aim to protect vulnerable populations and promote responsible labor practices, making these values an integral part of our operations and partnerships.

6. DIVERSITY, EQUITY & INCLUSION POLICY

NAP/ESG/PY/06

1. Introduction

At NAP, we are committed to fostering a diverse, equitable, and inclusive workplace where all employees are respected, valued, and given equal opportunities to thrive. As a manufacturer of plastic injection-moulded components and assemblies, we recognize the importance of embracing diversity in our workforce. This Diversity and Equity Policy is designed to prevent discrimination, harassment, and abuse in all forms, ensuring that every individual is treated fairly, regardless of race, gender, ethnicity, sexual orientation, religion, or disability. Aligned with our Environmental, Social, and Governance (ESG) principles, this policy reflects our dedication to creating a supportive and safe work environment. By promoting diversity and equity, we aim to strengthen our organizational culture and drive innovation for sustained success.

2. Scope

The scope of this Diversity and Equity Policy applies to all employees, contractors, and stakeholders associated with NAP, across all levels and departments. It encompasses all aspects of employment, including recruitment, training, promotion, compensation, performance evaluation, and disciplinary actions. The policy addresses diversity and equity in the workplace, ensuring that no individual faces discrimination, harassment, or abuse based on race, gender, ethnicity, sexual orientation, religion, disability, or any other protected characteristic. It also promotes an inclusive environment where all employees are encouraged to contribute their unique perspectives. The policy extends to interactions within the company, as well as relationships with clients, suppliers, and business partners, fostering an overall culture of respect and fairness throughout the organization.

3. Roles and Responsibilities

3.1. Senior Management

Senior Management is responsible for ensuring the successful implementation and continuous improvement of this Diversity and Equity Policy. They will allocate the necessary resources to promote diversity and equity across the organization, led by example in fostering an inclusive culture, and embrace diversity while promoting fairness. Senior Management will monitor and report on the progress of diversity and equity initiatives and ensure that all hiring, promotion, and reward decisions are based on merit and free from discrimination.

3.2. Diversity and Inclusion (D&I) Committee

The Diversity and Inclusion (D&I) Committee is responsible for designing and implementing training programs and awareness campaigns on diversity and equity. They will monitor the workplace for signs of discrimination, harassment, and inequality and regularly review organizational practices to identify areas for improvement in diversity and inclusion. The committee will collaborate with HR to ensure diverse hiring practices and equal opportunity employment and establish confidential reporting channels for employees to report incidents of discrimination or harassment.

3.3. Human Resources (HR)

Human Resources (HR) is responsible for ensuring that the recruitment process is inclusive and free from bias. HR will facilitate training on diversity, equity, and inclusion to raise awareness and foster open dialogue among employees. They will conduct exit interviews to identify any discriminatory practices or issues employees may have encountered. HR will support the implementation of corrective actions in cases of discrimination, harassment, or abuse and ensure all employees are informed of their rights, responsibilities, and reporting channels for discrimination.

3.4. Managers and Supervisors

Managers and Supervisors are responsible for leading their teams in a way that fosters inclusivity, respect, and collaboration. They will encourage an open and supportive atmosphere where all employees feel comfortable sharing their perspectives. Managers and Supervisors must identify and address any signs of discrimination, harassment, or abuse within their teams and ensure fair treatment in all aspects of performance management, including pay, promotion, and discipline. Their leadership should consistently reflect the organization's commitment to diversity and equity.

3.5. Employees

Employees are expected to treat all colleagues with respect and dignity, regardless of background, gender, ethnicity, or other personal characteristics. They should actively participate in training and awareness programs on diversity and inclusion. Employees must report any instances of discrimination, harassment, or abuse to HR or a supervisor immediately. Additionally, they are encouraged to contribute to a culture of inclusivity by recognizing and valuing diverse perspectives, fostering a work environment that supports mutual respect and collaboration.

4. Diversity, Equity & Inclusion Policy

4.1. Commitment to Prevent Discrimination and Harassment

NAP is fully committed to preventing all forms of discrimination and harassment within the workplace. Discrimination based on race, colour, gender, sexual orientation, age, disability, religion, national origin, marital status, pregnancy, or any other protected characteristic is strictly prohibited. Discrimination may take various forms, including direct discrimination (unfair treatment based on personal characteristics), indirect discrimination (policies or practices that disproportionately impact certain groups), harassment (unwanted behaviour creating a hostile environment), and bullying (acts that undermine an individual's dignity or well-being). The company is dedicated to maintaining a respectful, safe, and inclusive work environment for all employees.

4.2. Equal Treatment and Opportunities

NAP is committed to providing equal treatment and opportunities for all employees. Hiring, training, compensation, promotion, and benefits decisions will be based on objective criteria such as skills, qualifications, and performance, free from bias or prejudice. The company ensures inclusive recruitment practices, providing fair consideration to diverse candidates. Career development opportunities, including training and promotions, are accessible to all employees based on merit. Pay equity will be regularly reviewed to eliminate any gender or other bias in compensation. The company has clear grievance processes to address discrimination or harassment complaints promptly and effectively.

4.3. Creating an Inclusive Culture

NAP is committed to fostering a work culture that values diversity and promotes inclusion, creating an environment where all employees feel valued, respected, and empowered. Our initiatives include regular diversity training on cultural sensitivity, anti-bias, and inclusivity, as well as encouraging the formation of Employee Resource Groups (ERGs) focused on specific aspects of diversity such as gender, ethnicity, and disability. We promote the use of inclusive language in all internal communications and interactions. Additionally, we engage with local communities and organizations to support initiatives that advance diversity, equity, and inclusion, ensuring a broader impact beyond the workplace.

4.4. Preventing Psychological and Verbal Abuse

In addition to physical harassment, psychological and verbal abuse will not be tolerated under any circumstances. This includes verbal abuse, which refers to the use of offensive, harmful, or discriminatory language directed at others based on their race, gender, sexuality, or other personal characteristics. Psychological abuse involves any actions, words, or conduct that undermine a person's mental well-being, including threats, bullying, or isolation.

NAP is committed to providing support systems such as counseling and mental health resources for employees who experience or witness any form of verbal or psychological abuse, ensuring a safe and supportive work environment.

4.5. Commitment to Diversity and Inclusion

NAP is committed to creating a diverse and inclusive workplace where all employees are treated with respect and dignity. We believe that diversity in race, gender, age, sexual orientation, disability, religion, and other aspects fosters creativity, innovation, and better decision-making. The company strives to ensure equal opportunities for all employees, promoting an environment where everyone can contribute their unique perspectives. We will continually assess our practices to ensure that we foster an inclusive culture where diversity is celebrated and barriers to inclusion are eliminated.

4.6. Recruitment and Hiring Practices

NAP is committed to inclusive recruitment and hiring practices that ensure all candidates are given equal consideration, regardless of their background, gender, ethnicity, or other personal characteristics. Our recruitment process is designed to attract a diverse pool of candidates and assess them based on their qualifications, experience, and potential. We will actively seek to eliminate biases from job descriptions, candidate selection, and hiring decisions. This commitment ensures that all candidates, including women, minorities, and those with disabilities, have fair and equal opportunities to join our workforce.

4.7. Equal Opportunity for Career Advancement

At NAP, we ensure equal opportunities for career growth and advancement for all employees. Promotions and career development programs are based on merit, experience, and performance, ensuring that no employee is held back due to their gender, race, ethnicity, disability, or other personal characteristics. We provide training and development opportunities to all employees, fostering an inclusive environment where everyone can progress in their careers. Our goal is to ensure that all employees have the tools and support to reach their fullest potential within the company.

4.8. Anti-Discrimination and Harassment Policy

NAP strictly prohibits any form of discrimination or harassment in the workplace, whether based on race, gender, religion, disability, sexual orientation, age, or any other protected characteristic. Discriminatory behaviour, verbal or physical abuse, and harassment are not tolerated under any circumstances. We maintain a zero-tolerance policy and provide clear, accessible reporting channels for employees to report incidents of discrimination or harassment.

All complaints will be investigated promptly, and appropriate corrective actions will be taken to ensure a safe and respectful work environment for all employees.

4.9. Support for Employee Resource Groups (ERGs)

NAP encourages the formation of Employee Resource Groups (ERGs) to support the diverse needs and interests of our workforce. These employee-led groups provide a platform for employees to come together, share experiences, and advocate for initiatives that promote diversity, equity, and inclusion. ERGs serve as a critical resource for fostering a sense of belonging, offering mentorship, and influencing company policies. We support these groups by providing resources and a platform to address issues and champion diversity and inclusion across the organization.

4.10. Continuous Improvement and Accountability

NAP is committed to continuous improvement in diversity, equity, and inclusion. We regularly assess our policies, practices, and programs to ensure that we are making meaningful progress. Employee feedback, external audits, and industry best practices will guide our on-going efforts. We hold all employees, managers, and leadership accountable for fostering an inclusive environment, ensuring that diversity and inclusion remain integral to our corporate culture. Our diversity metrics will be tracked, and progress will be shared with employees to ensure transparency and accountability in our commitment to inclusivity.

5. Quantitative Objectives

Objective	Unit of Measure	Qualitative Target	Target Value
Increase diversity in the workforce	Percentage of hires	Ensure a diverse candidate pool in all hiring processes	30% minority group representation in all new hires
Reduce instances of discrimination	Reported incidents	Zero tolerance towards discrimination and harassment	Less than 2 incidents per year
Enhance diversity training participation	Training sessions	Ensure all employees attend annual diversity training	Maintaining 100% Organized
Promote women in leadership roles	Percentage in leadership roles	Increase the representation of women in leadership positions	25% women in senior management roles by 2026
Increase employee satisfaction on inclusivity	Employee feedback score	Improve employee perception of inclusivity and fairness	85% satisfaction in annual employee surveys

6. Distribution

The policy will be communicated through several channels to ensure wide accessibility and understanding. It will be introduced during new hire induction programs to provide employees with an early understanding of the company's commitment to diversity, equity, and inclusion. Regular email communications and newsletters will keep employees informed, while the policy will also be posted on the company's internal intranet for easy access. It will be reinforced during all diversity and inclusion workshops and training sessions. Additionally, the policy will be made accessible to external stakeholders, contractors, and suppliers through the company website and on boarding materials, ensuring broad awareness.

7. Annual Review and Continuous Improvement

The Diversity and Equity Policy will undergo an annual review to ensure its continued effectiveness and alignment with evolving legal requirements and industry best practices. This review process will incorporate feedback from employees, managers, and external consultants to identify areas for improvement and ensure that the policy reflects the changing dynamics of the workplace. Any necessary adjustments will be made based on the latest workplace trends, legal developments, and the company's on-going commitment to fostering an inclusive and equitable environment. By regularly reviewing and refining the policy, NAP aims to maintain a workplace that is not only compliant but also proactive in promoting diversity, equity, and inclusion across all levels of the organization.

8. Conclusion

NAP is fully committed to building and maintaining a diverse, inclusive, and equitable workplace where all employees are treated with respect and dignity. By adhering to this policy, we aim to prevent discrimination, harassment, and abuse in any form, while promoting equal treatment of all employees, regardless of their background. This policy demonstrates our dedication to embedding diversity and equity into our organizational culture, aligning with our ESG principles, and making our company a leader in social responsibility and workplace fairness.

7. EXTERNAL STAKEHOLDER HUMAN RIGHTS POLICY

NAP/ESG/PY/07

1. Introduction

NAP Pvt Ltd., a leading manufacturer of plastic injection-moulded components and assemblies, is committed to upholding and promoting human rights across its operations and value chain. We recognize the importance of respecting the dignity, equality, and welfare of individuals involved with our company, including employees, suppliers, contractors, and surrounding communities. This policy outlines our dedication to addressing both direct and indirect human rights impacts, ensuring ethical business practices, and fostering an inclusive environment. Our commitment aligns with international human rights standards and integrates Environmental, Social, and Governance (ESG) principles to enhance sustainability and corporate responsibility.

2. Scope

This policy applies to all external stakeholders associated with NAP Pvt. Ltd., including suppliers, contractors, business partners, customers, and communities affected by our operations. It covers all aspects of human rights, addressing both direct and indirect impacts that arise from our business activities. The scope extends to human rights considerations in the supply chain, labor practices, community interactions, and environmental impact. This policy is designed to ensure that our operations promote respect for human rights at every level, in alignment with global standards and our company's ESG commitments, thereby fostering sustainable and ethical business practices.

3. Roles and Responsibilities

3.1. Senior Management:

Senior Management at NAP is responsible for ensuring that the company's activities align with human rights principles. They oversee the effective implementation and on-going monitoring of this policy, ensuring adherence to global human rights standards. Senior Management is tasked with allocating resources to address and mitigate any human rights risks associated with our operations, supply chain, or community interactions. In cases of violations impacting external stakeholders, they are responsible for taking swift and decisive action to address the issue, ensuring accountability and reinforcing the company's commitment to human rights across all business practices.

3.2. Human Resources (HR):

The Human Resources (HR) department at NAP plays a crucial role in coordinating with external stakeholders to ensure fair labor practices, with particular emphasis on compliance with child and forced labor prohibitions. HR is responsible for implementing programs that address human rights risks and raise awareness among employees, suppliers, and contractors. Additionally, HR monitors and reports on the effectiveness of human rights initiatives, providing regular assessments and recommendations for improvements. This ensures that the company remains proactive in fostering ethical practices and continuously enhancing its commitment to human rights within its operations and supply chain.

3.3. Procurement & Supply Chain Management:

The Procurement and Supply Chain Management team at NAP is responsible for ensuring human rights compliance throughout the supply chain. This includes screening suppliers and contractors to verify their adherence to established human rights standards, ensuring that they align with the company's values. The team regularly monitors supply chain activities to detect any potential human rights violations, taking prompt corrective actions when necessary. By maintaining rigorous oversight and fostering strong relationships with ethical partners, the Procurement and Supply Chain team ensures that human rights are respected at every stage of the supply chain process.

3.4. Legal and Compliance Department:

The Legal and Compliance Department at NAP plays a crucial role in advising on legal aspects related to human rights and ensuring compliance with both local and international laws. The department is responsible for implementing effective grievance mechanisms, ensuring that all complaints are handled in a timely and fair manner. Additionally, the Legal team regularly reviews and updates contracts with suppliers and contractors to ensure they uphold the company's human rights commitments. By maintaining strong legal oversight, the department helps mitigate risks and reinforces the company's dedication to human rights standards.

3.5. Employees:

Employees at NAP are expected to treat all external stakeholders with the utmost respect and dignity, ensuring that their rights are protected in all interactions. They are encouraged to actively participate in training programs focused on human rights to deepen their understanding and awareness. In case of any suspected or actual human rights violations, employees are responsible for reporting the issue to the relevant authority within the company promptly. By fostering a culture of respect and responsibility, employees contribute significantly to upholding the company's human rights commitments in all business operations.

4. External Stakeholder Human Rights Policy

4.1. Human Rights in the Supply Chain:

NAP is committed to ensuring that its entire supply chain operates in full respect of human rights for workers and local communities. We expect all suppliers and business partners to adhere to international human rights standards, including the prohibition of child labor, forced labor, and discrimination. To uphold this commitment, our suppliers are required to comply with NAP 's human rights principles through contractual obligations. Regular audits will be conducted to monitor supplier compliance and ensure adherence to these standards, fostering a responsible and ethical supply chain across all operations.

4.2. Labor Rights and Fair Employment Practices:

NAP is dedicated to providing a fair and just working environment for all employees and external stakeholders engaged in production activities. This includes offering equitable wages, ensuring safe working conditions, and promoting career development opportunities. The company firmly opposes all forms of discrimination, harassment, and exploitation in the workplace. To support this commitment, we aim for 100% of our suppliers to adhere to labor rights standards and ensure full compliance with local labor laws across all regions of operation, promoting fair employment practices throughout our supply chain.

4.3. Non-Discrimination and Equal Opportunity:

NAP is committed to fostering an environment of non-discrimination and equal opportunity for all employees, contractors, and suppliers, regardless of gender, race, ethnicity, sexual orientation, religion, or disability. We strive to promote diversity and inclusion at every level of our operations, ensuring that all individuals are treated with fairness and respect. To achieve this, we aim for 100% equal opportunity hiring across all levels of the organization and ensure that at least 90% of employees report positive perceptions of diversity and inclusivity within the company, supporting our commitment to an inclusive work culture.

4.4. Health, Safety, and Wellbeing:

NAP is dedicated to ensuring a safe and healthy environment for all external stakeholders impacted by our operations, including contractors, suppliers, and surrounding communities. We will enforce strict health and safety policies to prevent accidents and minimize exposure to harmful chemicals and materials. Our commitment to safety includes achieving zero workplace fatalities across all stakeholders and reducing health-related incidents in the supply chain by 10% year-over-year. By continuously improving our health and safety practices, we aim to safeguard the well-being of all those involved in or affected by our operations.

4.5. Environmental Impact and Responsibility:

NAP is committed to minimizing the environmental impact of its operations, recognizing the potential effects on local communities and surrounding environments. We adopt environmentally responsible practices to reduce harmful waste, lower emissions, and promote sustainability throughout our supply chain. Our objectives include reducing carbon emissions in the supply chain by 20% within the next 5 years and ensuring that 95% of all suppliers adhere to our sustainability criteria. By fostering environmentally conscious practices, we aim to contribute positively to both the environment and the communities in which we operate.

4.6. Community Engagement and Local Development:

NAP is committed to engaging with local communities to understand their concerns and aspirations regarding our operations. We strive to positively contribute to community development through initiatives such as job creation, local sourcing, and supporting local economies, all while ensuring the human rights of these communities are respected. Our objectives include investing in at least three community development initiatives annually and maintaining positive relations with 100% of local communities affected by our operations. By fostering strong partnerships and contributing to local growth, we aim to create lasting, positive impacts in the areas where we operate.

4.7. Grievance Mechanisms and Whistleblower Protections:

NAP is committed to providing accessible grievance mechanisms for external stakeholders to report any potential human rights violations. We ensure that all complaints are treated seriously, investigated thoroughly, and resolved promptly. To maintain a transparent and responsive approach, we have established Whistleblower protections to prevent retaliation against those who report violations. Our objectives are to ensure that 100% of complaints are addressed within 30 days and to achieve an annual increase of 10% in reported grievances. This commitment ensures accountability, trust, and continuous improvement in human rights practices across our operations.

4.8. Transparency and Reporting:

NAP is committed to transparency in reporting on human rights impacts across our operations. We will publish an annual Human Rights Impact Report, providing detailed insights into our supply chain practices, labor conditions, community engagement efforts, and environmental initiatives. These reports will be made publicly accessible to all stakeholders, ensuring full transparency of our actions and performance. Our objectives include publishing this report annually and ensuring 100% transparency in supplier audits, reinforcing our commitment to accountability and continuous improvement in all aspects of human rights across our operations.

4.9. Human Rights Education and Training:

NAP is committed to ensuring that all employees and external stakeholders are well-informed about human rights policies and practices. We will offer regular education programs to employees, suppliers, and contractors to raise awareness and empower them to uphold human rights in their daily operations. Our objectives include providing human rights training to 100% of employees and key suppliers annually, as well as ensuring that 80% of our suppliers conduct their own internal human rights training within two years. This initiative will foster a culture of respect and accountability throughout our workforce and supply chain.

4.10. Continuous Monitoring and Improvement:

NAP is committed to continuous improvement in managing human rights impacts. We will regularly assess and review our policies, practices, and relationships with external stakeholders to identify areas for improvement. Through an inclusive feedback loop, we will engage stakeholders to ensure that targeted action plans are developed to address any identified gaps. Our objectives include conducting bi-annual human rights assessments across the supply chain and achieving a 10% year-over-year improvement in human rights compliance scores. This proactive approach will ensure that we maintain high standards and continually enhance our human rights practices.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Percentage of suppliers meeting HR standards	Percentage	Maintaining 100% Organized
Supplier audits per year	Number of Audits	5
Reduction in human rights violations	Percentage reduction	15% annually
Training completion rate for employees	Percentage of employees	Maintaining 100% Organized
Grievance resolution rate	Percentage of resolved grievances	Maintaining 100% Organized

6. Distribution

This policy will be distributed to all external stakeholders, including suppliers, contractors, and local communities where applicable. It will be accessible through our website, shared during on boarding processes, and provided at key points of engagement with external stakeholders. Additionally, the policy will be made available through internal communications to all employees involved in stakeholder management and supply chain oversight.

We will ensure that the policy is easily accessible, well-communicated, and understood by all relevant parties to promote a shared commitment to human rights and responsible business practices.

7. Annual Review and Continuous Improvement

NAP's External Stakeholder Human Rights Policy will undergo an annual review to ensure its continued effectiveness and alignment with evolving laws, regulations, and industry best practices. Feedback will be gathered from both internal and external stakeholders, including employees, suppliers, contractors, and affected communities, to inform this process. Based on this feedback, any necessary updates or amendments will be made to strengthen the policy and enhance its impact. This review ensures that NAP remains committed to continuous progress in addressing human rights concerns and promoting ethical business practices across its operations and supply chain.

8. Conclusion

NAP is committed to maintaining the highest standards of human rights across its operations and relationships with external stakeholders. By implementing this policy, we aim to ensure that human dignity, equality, and fairness are upheld throughout our supply chain, partnerships, and community engagement efforts. Through continuous monitoring, collaboration with stakeholders, and adherence to international human rights standards, we strive to minimize any adverse impacts. Our dedication to human rights is integral to our ESG approach and forms the foundation for building a sustainable, ethical, and inclusive business environment for all stakeholders.

8. LIVING WAGE POLICY

NAP/ESG/PY/08

1. Introduction

NAP is committed to providing a fair and ethical working environment for all employees, contractors, and external stakeholders across its value chain. As part of our commitment to Environmental, Social, and Governance (ESG) principles, we recognize that the payment of a living wage is a fundamental human right. A living wage ensures that workers earn enough to meet their basic needs, including food, housing, healthcare, education, and transportation, without struggling to meet the basic requirements of life. This policy outlines NAP's commitment to paying a living wage and its role in protecting the well-being and dignity of all stakeholders. Our mission is to consistently pay wages that meet or exceed the standards set by local governments and recognized international living wage guidelines. This policy addresses how we will integrate the payment of living wages into our operations, supply chain, and relationships with external stakeholders.

2. Scope

This policy applies to all employees of NAP, including direct staff, contractors, suppliers, and any other external stakeholders engaged through our business operations. This policy covers all regions where NAP operates and ensures that our remuneration practices align with both local legal requirements and international best practices for living wages. The policy also applies to NAP's relationships with all suppliers and contractors. Our commitment extends to ensuring that these external parties also meet the minimum living wage standards, in line with our contractual agreements, and continuously improve their practices.

3. Roles and Responsibilities

3.1. Senior Management:

Senior management at NAP is responsible for ensuring that the company's operations are aligned with the living wage policy and global standards. They oversee the implementation, monitoring, and periodic review of the policy and associated initiatives. Senior management ensures that sufficient resources are allocated to address any identified living wage gaps within the workforce and supply chain. Additionally, they are accountable for enforcing corrective actions if any external stakeholders, including suppliers and contractors, fail to meet the established living wage criteria. Their leadership is essential in maintaining the company's commitment to fair compensation and continuous improvement in wage standards.

3.2. Human Resources (HR):

The Human Resources (HR) department is responsible for implementing the living wage framework throughout the company and ensuring compliance with the policy. HR will monitor and verify that all employees, contractors, and suppliers receive wages that meet or exceed the established living wage standards. Regular wage audits will be conducted to identify any gaps, and necessary adjustments will be made to ensure compliance. HR will also be responsible for reporting instances of non-compliance and taking corrective actions where needed. Their efforts are crucial in maintaining a fair and transparent wage structure within the organization and its supply chain.

3.3. Procurement and Supply Chain Management:

The Procurement and Supply Chain Management department is responsible for integrating living wage criteria into all supplier and contractor agreements to ensure fair compensation practices throughout the supply chain. Regular supplier audits will be conducted to verify that wages meet the living wage standards. The department will also offer guidance and support to suppliers who need to improve their wage practices to align with the policy. Additionally, Procurement will monitor the impact of living wage payments on supplier relationships, ensuring that these practices contribute to the long-term sustainability and ethical standards of the supply chain.

3.4. Legal and Compliance Department:

The Legal and Compliance Department is responsible for ensuring compliance with all local, regional, and international laws related to wages, including living wage standards. They will provide advice on the legal implications of non-compliance with living wage regulations and help mitigate any potential risks. The department will review and update contracts and agreements with suppliers, contractors, and employees to incorporate living wage commitments. Additionally, Legal and Compliance will offer training to internal and external stakeholders to ensure they understand their legal obligations regarding wages, fostering a culture of accountability and adherence to wage regulations across the company and its supply chain.

3.5. Employees:

Employees at NAP are expected to understand and support the company's commitment to ensuring living wages for all stakeholders. They will actively participate in wage-related training programs to stay informed about the living wage standards. Employees are encouraged to report any discrepancies in wage payments to the appropriate authorities within the company to ensure timely resolution. Furthermore, they are invited to engage in company-led initiatives that promote fair wage practices, fostering a collaborative effort to uphold the company's values of fairness, transparency, and respect for all individuals involved in the business operations.

4. Living Wage Policy

4.1. Living Wage Definition and Standards:

NAP defines a living wage as the income necessary for workers to meet the basic standard of living, covering essentials such as housing, food, transportation, healthcare, and education. It ensures financial security and access to vital services, allowing workers and their families to thrive. Our commitment is to pay wages that exceed the official minimum wage in each location, ensuring that employees, contractors, and suppliers receive compensation that supports a sustainable, dignified standard of living. By doing so, we uphold the well-being of our workforce and promote long-term financial stability.

4.2. Living Wage Calculation:

NAP calculates the living wage by analysing regional economic data, cost of living indices, and industry standards. We will use data from government sources, NGOs, and independent living wage research organizations to establish benchmark figures that reflect the actual cost of living in each operational region. This approach ensures that wages are adequate to cover essential expenses such as housing, food, transportation, healthcare, and education. By regularly reviewing and adjusting these benchmarks, we aim to maintain a fair and sustainable wage system that meets the evolving needs of our workforce.

4.3. Compliance with Legal Standards:

NAP is committed to ensuring that all wages comply with local laws and international wage standards. In regions where the legal minimum wage fails to meet a reasonable standard of living, the company will pay wages that exceed the minimum legal requirements to ensure a living wage for all workers. This commitment reflects our dedication to fair labor practices and the well-being of our employees, ensuring they can afford basic needs such as housing, food, healthcare, and education. We will continuously review and adjust our wage policies to ensure compliance and maintain a high standard of living for our workforce.

4.4. Internal Wage Audits and Adjustments:

NAP is committed to conducting bi-annual internal wage audits to ensure that all employees and contractors are paid a living wage. If any discrepancies are found, immediate adjustments will be made to ensure compliance. The company will also take into account economic factors such as inflation and changes in the cost of living to ensure wages are regularly updated. Our objective is to achieve a 5% year-on-year increase in the number of employees receiving wages above the living wage benchmark, ensuring continuous alignment with evolving economic conditions and fair compensation for all workers.

4.5. Transparency and Reporting:

NAP is committed to maintaining transparency in our wage practices and living wage implementation. We will publish an annual wage compliance report as part of our ESG reporting, which will detail wage structures, adjustments, and compliance with living wage standards. This report will be publicly accessible to all stakeholders, ensuring visibility and accountability in our wage practices. Additionally, we will ensure 100% transparency in supplier audits related to wages, providing stakeholders with clear insights into our compliance efforts and reinforcing our commitment to fair compensation throughout our supply chain.

4.6. Employee Benefits and Support:

NAP is committed to providing comprehensive employee benefits that go beyond a living wage. In addition to competitive wages, we will offer essential benefits such as healthcare, retirement savings, paid time off, and employee assistance programs. These benefits are designed to ensure the long-term well-being and security of our workforce, supporting a healthier, more productive work environment. Our quantitative objectives include ensuring that 100% of employees receive health and wellness benefits alongside their wages and achieving a 90% engagement rate in our employee assistance programs, further fostering a supportive workplace culture.

4.7. Training and Awareness:

NAP is dedicated to raising awareness and providing comprehensive training on living wage standards and wage-related policies. We will ensure that all employees, contractors, and key suppliers receive training on the importance of living wages, their rights, and how these practices contribute to long-term business sustainability and the well-being of workers. Our quantitative objectives include providing living wage and wage rights training to 100% of employees, contractors, and key suppliers, and ensuring that 90% of employees report satisfaction with the training on living wage awareness, fostering a well-informed and engaged workforce.

4.8. Supplier Engagement and Compliance:

NAP is committed to ensuring that all suppliers and contractors adhere to living wage standards. As part of our supplier agreements, we will require a commitment to pay a living wage, and we will conduct regular audits to verify compliance. We will offer support to suppliers who are working towards meeting these standards. Our quantitative objectives include ensuring that 95% of all suppliers pay their workers a living wage, and conducting audits of 100% of suppliers to verify compliance with living wage standards, helping to maintain fair labor practices across our supply chain.

4.9. Community Engagement and Social Responsibility:

NAP is committed to promoting a living wage not only within the company but also in the communities where we operate. Through our social responsibility initiatives, we will collaborate with local governments and NGOs to address wage disparities and support economic development. Our quantitative objectives include investing in at least three community development programs annually aimed at improving local wage standards, and ensuring that 90% of local communities report positive impacts from NAP's living wage initiatives. This effort will contribute to raising the standard of living and creating long-term economic opportunities in the regions we serve.

4.10. Continuous Improvement and Feedback Mechanism:

NAP is dedicated to continuously improving its living wage practices by actively seeking feedback from employees, contractors, suppliers, and other stakeholders. This feedback will guide necessary adjustments and corrective actions to enhance wage standards. As part of this commitment, we will conduct an annual stakeholder survey to assess the effectiveness of our living wage practices. Additionally, we aim to achieve a 10% year-over-year improvement in living wage satisfaction from stakeholders. This approach will ensure that our wage practices remain responsive to the needs and expectations of all parties involved.

5. Quantitative Objective

Objective	Unit of Measure	Target Value
Conduct Annual Living Wage Audits	Number of audits conducted	Maintaining 100% Organized
Achieve Full Compliance with Local Living Wage Standards	Percentage of employees compliant	Maintaining 100% Organized
Improve Living Wage Compliance in Supply Chain	Percentage of suppliers compliant	90% of suppliers compliant by 2025
Increase Wage Adjustments for Inflation	Percentage of wage increases	5% increase in wages annually
Employee Satisfaction on Living Wage	Percentage of employees satisfied	90% employee satisfaction with wages

6. Annual Review

NAP will review this policy annually to ensure it remains aligned with global best practices, legal requirements, and the evolving needs of our workforce and supply chain. The policy will be adjusted as necessary to reflect changes in local and international economic conditions, government regulations, and stakeholder feedback. The company will conduct an annual review of the living wage policy, incorporating insights from stakeholders to identify areas for improvement. Additionally, we aim to achieve a 5% year-over-year improvement in wage compliance across our supply chain, ensuring that all employees and workers within our operations receive fair and sustainable compensation aligned with living wage standards.

7. Distribution

The Living Wage Policy will be distributed to all employees, contractors, suppliers, and key external stakeholders to ensure widespread awareness and adherence to the company's commitment. The policy will be made available on the company's website for easy access by all interested parties. It will also be included in on boarding materials for new employees and communicated regularly through internal channels such as email and staff meetings. To ensure full compliance across the supply chain, the policy will be integrated into contracts with suppliers and contractors, emphasizing the requirement to adhere to living wage standards. This comprehensive distribution plan will help reinforce NAP’s dedication to fair compensation and human rights for all individuals associated with the company.

8. Conclusion

NAP is committed to ensuring that all individuals within its operations, including employees and external stakeholders, receive a living wage that meets their basic needs and supports their well-being. We will regularly conduct audits, provide training, and implement continuous improvement initiatives to ensure that our living wage commitments are upheld throughout our business and supply chain. This policy highlights our on-going dedication to human rights, fair labor practices, and the sustainable development of both our workforce and the communities we engage with. By fostering a fair compensation environment, NAP aims to promote a positive and thriving work culture while making a meaningful impact on society.

9. GRIEVANCE MECHANISM POLICY
NAP/ESG/PY/09

1. Introduction

NAP is committed to maintaining a workplace free from discrimination, harassment, and any form of unfair treatment. As part of our dedication to fostering a safe, respectful, and inclusive work environment, we have established a clear and accessible grievance mechanism. This policy outlines the processes, roles, responsibilities, and objectives for handling grievances related to discrimination and harassment within our organization, including mechanisms for reporting and resolving such issues. Our grievance mechanism is designed to ensure that all employees, contractors, and external stakeholders can report incidents of discrimination or harassment without fear of retaliation, ensuring confidentiality throughout the process. This policy will also demonstrate NAP's on-going commitment to upholding human rights and fairness in all our operations.

2. Scope

The scope of this Grievance Mechanism on Discrimination and Harassment Policy applies to all employees, contractors, suppliers, and external stakeholders associated with NAP. It covers all forms of discrimination and harassment, including gender, race, age, disability, and other protected characteristics, both within the workplace and in the broader business environment. This policy ensures that any incidents of discrimination or harassment are reported, investigated, and addressed in a timely and fair manner. It guarantees accessibility, non-retaliation, and confidentiality for all individuals involved in the grievance process, demonstrating the company's commitment to upholding human rights and equality.

3. Roles and Responsibilities

3.1. Senior Management:

Senior management is responsible for overseeing the implementation of the grievance mechanism, ensuring it operates effectively and fairly. They will ensure that adequate resources, training, and support are provided to HR and grievance officers to carry out their responsibilities efficiently. Senior management will also take final decisions on the actions to be taken in response to substantiated grievances, ensuring that appropriate corrective measures are implemented to address the issues raised. Their leadership and commitment will help maintain a workplace culture of respect, accountability, and fairness for all employees.

3.2. Human Resources:

The HR and grievance officers are responsible for managing the grievance reporting and investigation process, ensuring that all grievances are addressed promptly and in line with the established policy. They will ensure that grievance reports are handled with impartiality, in a manner that upholds confidentiality and protects the identities of those involved. Throughout the investigation, they will maintain a strict non-retaliation policy to protect employees who report grievances in good faith. Additionally, they will work to ensure a fair and transparent process that respects the rights of both the complainant and the accused parties.

3.3. Grievance Officer:

The Grievance Officer serves as the primary contact for employees and stakeholders filing grievances, ensuring that all complaints are acknowledged and processed in a timely manner. They are responsible for conducting investigations into complaints with fairness and thoroughness, gathering necessary evidence and interviewing relevant parties. Throughout the investigation process, the Grievance Officer will provide regular updates to the complainant, the accused, and relevant stakeholders to ensure transparency and trust in the process. They are dedicated to resolving grievances in accordance with company policies, upholding confidentiality, and ensuring no retaliation against those who report issues in good faith.

3.4. Employees and Contractors:

Employees and contractors are expected to be aware of the grievance mechanism and actively support its implementation by reporting any incidents of discrimination or harassment through the appropriate channels. They should promptly raise concerns in a confidential and respectful manner, ensuring a safe work environment for all. Employees and contractors may also be required to participate in the grievance resolution process when necessary, either by providing information or cooperating with investigations. By doing so, they contribute to fostering a fair, respectful, and inclusive workplace where all individuals' rights are protected.

3.5. Suppliers and External Stakeholders:

Suppliers and external stakeholders are expected to commit to adhering to NAP's grievance mechanism while engaging with the company. They must promptly report any concerns related to discrimination or harassment that may arise in their interactions with NAP, ensuring that such issues are addressed through the established reporting channels. By doing so, they contribute to maintaining a respectful, inclusive, and fair working relationship, aligned with the company's values of diversity and equity, and supporting the goal of a discrimination-free environment for all stakeholders involved.

4. Grievance mechanism on discrimination and/or harassment issues Policy

4.1. Purpose and Scope:

The purpose of this grievance mechanism is to ensure a fair, accessible, and transparent process for reporting issues related to discrimination and harassment. The policy applies to all employees, contractors, suppliers, and external stakeholders associated with NAP, both within the workplace and during business interactions. It addresses grievances concerning various forms of discrimination and harassment, including but not limited to gender-based discrimination, racial or ethnic discrimination, age discrimination, disability discrimination, and harassment based on religion, caste, sexual orientation, or any other protected characteristic, ensuring a respectful and inclusive environment for all.

4.2. Accessibility:

The grievance mechanism must be accessible to all employees, contractors, suppliers, and stakeholders. Multiple reporting channels, including a dedicated hotline, email, online forms, and in-person submission, will be made available. Information about how to raise grievances will be clearly communicated and displayed across company platforms and during on boarding sessions. The system is designed to ensure ease of use and accessibility for individuals from all backgrounds, including those with disabilities or language barriers.

4.3. Non-Retaliation:

NAP is committed to a non-retaliation policy, ensuring that no individual faces retaliation for reporting discrimination or harassment. Any employee or stakeholder who raises a grievance will be protected from retaliation, such as termination, demotion, or any form of punitive action. The company will take immediate action if retaliation occurs, ensuring that the grievance mechanism remains effective and trusted. This protection will be communicated clearly to all stakeholders to promote confidence in the reporting process.

4.4. Confidentiality:

All grievances will be handled with the utmost confidentiality to protect the privacy of the individuals involved. Personal information about the complainant, the accused, and any witnesses will not be disclosed without prior consent unless required by law. The grievance process will ensure that only those directly involved in the investigation and resolution process have access to sensitive information. Confidentiality ensures that individuals feel safe to report incidents without fear of public exposure or judgment.

4.5. Investigation and Resolution Process:

Once a grievance is received, it will be promptly acknowledged within few days. A detailed investigation will be conducted by the designated grievance officer or a third-party investigator if necessary, involving interviews, document reviews, and evidence collection. If the grievance is substantiated, appropriate corrective actions, such as disciplinary measures, training, or changes to workplace practices, will be implemented. The entire investigation and resolution process will be completed within days of receiving the grievance, ensuring a timely and fair response to the issue.

4.6. Timely and Fair Investigation:

NAP commits to addressing grievances of discrimination or harassment promptly. A dedicated team will be responsible for investigating complaints and resolving them within a set timeline, ensuring fairness and transparency. All parties will be treated impartially, and the process will be objective, focusing on facts and evidence. Regular updates will be provided to the complainant about the status of the investigation, and the outcome will be communicated once the issue has been resolved. Continuous feedback will be sought to improve the process.

4.7. Fairness and Timeliness:

NAP ensures that all grievances of discrimination and harassment are investigated impartially, objectively, and within a reasonable timeframe. A dedicated team will review and resolve complaints promptly, with all involved parties being treated fairly and with respect. The company will set clear timelines for addressing grievances, ensuring that the process remains efficient and transparent. Updates will be provided regularly to complainants, and resolutions will be communicated clearly, with corrective actions taken when necessary to prevent future incidents.

4.8. Corrective Action and Resolution:

Once a grievance is investigated, NAP will take appropriate corrective actions to address any issues related to discrimination or harassment. The company ensures that resolutions will be fair and commensurate with the severity of the issue. Actions may include disciplinary measures against offenders, educational or training programs, or changes in policies or procedures. Corrective actions will be tracked to ensure that they are effective and that no similar issues arise in the future. The company is committed to maintaining a work environment where such behaviours are not tolerated, and corrective action is consistently applied.

4.9. Training and Awareness:

NAP will provide training and awareness programs for all employees, contractors, and relevant stakeholders to promote understanding of discrimination and harassment issues, including how to recognize and report such concerns. Regular training sessions will be held to ensure everyone understands their rights, the available reporting mechanisms, and the importance of addressing these issues within the organization. Awareness programs will also highlight the importance of maintaining a respectful workplace and the company's commitment to equal treatment and non-discrimination, helping create an environment where grievances are handled appropriately and sensitively.

4.10. Monitoring, Reporting, and Review:

NAP will regularly monitor and assess the effectiveness of the grievance mechanism. Annual reviews will be conducted to evaluate the grievance process's efficiency, identify patterns or recurring issues, and make improvements where necessary. The company will track the number of grievances filed, the resolution rate, and the time taken to resolve each issue. Data and insights from these reviews will be shared with relevant stakeholders, including senior management, to drive continuous improvement. The company will make any necessary adjustments to policies and processes to ensure the grievance mechanism remains effective and responsive.

5. Quantitative Objectives:

To measure the effectiveness of the grievance mechanism, the following quantitative objectives will be established:

Objective	Unit of Measure	Target Value
Number of grievances reported	Total Count	Maintaining 100% Organized
Time taken for resolution	Average time (days)	Resolution within 30 days
Employee satisfaction with grievance process	Percentage (survey feedback)	90% satisfaction rate

6. Distribution

The Grievance Mechanism on Discrimination and/or Harassment Issues Policy will be distributed to all employees through multiple channels to ensure accessibility and awareness. This includes publishing the policy on the company intranet, including it in the employee handbook provided to new hires, and conducting mandatory training sessions for all employees to familiarize them with the grievance procedure.

Additionally, managers and HR personnel will receive specific training on handling discrimination and harassment complaints. The policy will also be communicated during annual reviews and updates to ensure on-going understanding and compliance across the organization.

7. Annual Review

The grievance mechanism will undergo an annual review to assess its effectiveness, accessibility, and alignment with best practices. This review will consider the number and nature of grievances reported, evaluating trends and areas for improvement. It will also assess the efficiency of the investigation and resolution process, ensuring timely and fair outcomes. Additionally, feedback from employees, contractors, suppliers, and other stakeholders will be gathered to evaluate the fairness and effectiveness of the mechanism. The review will inform any necessary adjustments to improve the policy and maintain a discrimination-free and inclusive environment.

8. Conclusion

NAP is committed to addressing discrimination and harassment with the utmost seriousness and ensuring that all stakeholders feel safe and respected in the workplace. Our grievance mechanism provides a transparent, accessible, and non-retaliatory process for reporting and resolving issues, aligning with our commitment to human rights and fair treatment. Through effective implementation, monitoring, and continual improvement, we aim to foster a workplace culture that promotes respect, equality, and inclusivity for all.

10. DISCRIMINATION AND HARASSMENT REMEDIATION

NAP/ESG/PY/10

1. Introduction

At NAP, we are committed to upholding the highest standards of ethical conduct and ensuring a work environment that promotes respect, inclusion, and fairness. We recognize that discrimination and harassment, in any form, are detrimental to individuals and organizations, undermining well-being, morale, and productivity. This policy outlines the remediation procedures in place for victims of discrimination and/or harassment, aiming to address both direct and indirect human rights impacts stemming from our operations. These procedures will guide our response to instances of discrimination or harassment, ensuring proportional, transparent, and monitored actions are taken to support victims and foster a healthy, respectful workplace.

2. Scope

The scope of this policy covers all employees, contractors, suppliers, and external stakeholders engaged with NAP. It applies to all incidents of discrimination or harassment that occur within the workplace, during company-related activities, or in the course of business operations. The policy outlines procedures for reporting, investigating, and remediating discrimination and harassment, ensuring proportionality, transparency, and continuous monitoring. It aims to support victims, correct harm, and prevent recurrence, addressing both direct and indirect impacts of discriminatory or harassing behaviour. The policy also includes provisions for training, victim protection, and accountability across all levels of the organization.

3. Roles and Responsibilities

3.1. Senior Management:

Senior Management at NAP holds key responsibilities in enforcing the policy on discrimination and harassment. They ensure that adequate resources and training are allocated to address these issues comprehensively, setting a clear example in fostering an inclusive, respectful workplace. Senior Management is tasked with overseeing the policy's implementation and maintaining compliance across all levels of operation. They also approve final remediation actions, ensuring that these measures align with both legal and ethical standards. Through their leadership, they commit to upholding a fair, supportive work environment where discrimination and harassment are actively prevented and addressed.

3.2. Human Resources (HR) Department:

The Human Resources (HR) Department plays a central role in administering and overseeing the remediation process for cases of discrimination and harassment at NAP. HR ensures that all employees are informed of their rights, the grievance mechanisms available, and the procedures for remediation. They provide essential support to victims throughout the process, including counselling services or referrals to external resources if needed. Additionally, HR monitors, documents, and evaluates all remediation efforts to track their effectiveness and ensure continuous improvement, maintaining records that reflect each case's resolution and outcomes. This comprehensive approach underscores HR's commitment to fostering a safe, equitable workplace.

3.3. Grievance Officer:

The Grievance Officer acts as the primary contact for reporting discrimination and harassment grievances, ensuring a reliable and accessible channel for concerns. They promptly and impartially investigate complaints, working to uphold fairness and respect throughout the process. The officer develops tailored remediation plans for victims, ensuring that responses are appropriate to the seriousness of each case. During all investigations, the Grievance Officer maintains strict confidentiality and upholds transparency with all parties involved, providing regular updates and fostering trust in the procedure. This role is essential in reinforcing the company's commitment to an equitable and safe workplace.

3.4. Employees and Contractors:

Employees and Contractors play a crucial role in fostering a respectful workplace by reporting any incidents of discrimination or harassment they experience or witness through designated channels. They are expected to fully cooperate with investigations and remediation efforts, maintaining the confidentiality and privacy of all involved parties to ensure a respectful process. Additionally, all employees and contractors participate in regular training and awareness programs focused on preventing discrimination and harassment. Their active engagement supports a culture of accountability and reinforces the company's commitment to a safe and inclusive work environment.

3.5. Suppliers and External Stakeholders:

Suppliers and External Stakeholders are expected to fully adhere to NAP's policies on anti-discrimination and harassment when conducting business with the company. This includes upholding respectful and inclusive interactions with employees, contractors, and other affiliates of NAP . Suppliers and external partners are encouraged to promptly report any concerns related to discrimination or harassment that may arise from their interactions with the company or its representatives. By supporting these principles, suppliers and stakeholders play an active role in promoting a safe and equitable business environment aligned with NAP's values.

4. Support & Remediation for Procedures Policy

4.1. Introduction to Remediation Procedures:

NAP recognizes that prompt and effective remediation is essential to maintaining a safe and equitable workplace. The company is committed to ensuring that any victim of discrimination or harassment receives the appropriate support and that the situation is rectified in a fair and transparent manner. Remediation procedures are designed to address both direct and indirect harm caused by discrimination and harassment incidents and aim to restore dignity and justice to affected individuals.

4.2. Remediation Principles:

The remediation process at NAP will prioritize proportionality, transparency, and monitoring. Remedies will be proportional to the severity and impact of each case, considering the incident's gravity, those affected, and relevant circumstances to restore fairness. Transparency will be maintained throughout, with clear communication about actions taken, decisions, and outcomes provided to all involved parties, ensuring accountability. Monitoring will regularly assess the remediation process's effectiveness, including follow-up with victims to confirm satisfaction and the prevention of recurring incidents. Additionally, long-term impacts of these efforts will be reviewed to ensure a sustained, respectful workplace.

4.3. Grievance and Remediation Mechanism:

Employees, contractors, suppliers, and stakeholders can confidentially report incidents of discrimination or harassment through the company's grievance mechanism. Once a grievance is received, the designated grievance officer will acknowledge the complaint and promptly begin an investigation to gather relevant facts. If the grievance is substantiated, a proportional remediation plan will be developed in consultation with the affected individual. This may involve an apology and acknowledgment of harm, training or counseling for the perpetrator(s), adjustments to workplace practices to prevent recurrence, financial compensation or other suitable remedies, and, when necessary, formal disciplinary actions up to and including termination.

4.4. Impact Assessment:

An impact assessment will be conducted to evaluate the direct and indirect effects of discrimination or harassment on the victim, the workplace environment, and the broader community. This assessment will analyze how the incident has affected the victim's well-being, team dynamics, productivity, and any potential reputational impacts on the organization. It will also provide insights into the broader implications within the community or industry if applicable. Findings from this assessment will guide the remediation process, ensuring that responses are not only corrective but also preventive. By identifying the root causes and contributing factors of the incident, the assessment will support the implementation of measures to reduce the likelihood of similar situations in the future.

4.5. Victim Support and Protection:

Victims of discrimination or harassment will receive full support throughout the remediation process, including access to counselling, adjustments to their working conditions such as relocation or modified duties, and referrals to external legal or support services if needed. The company is committed to safeguarding victims from any form of retaliation or further discrimination during the investigation and remediation phases. Any retaliation against a victim will be treated as a serious offense and will lead to disciplinary action. This protective approach ensures that victims feel secure and supported while their grievances are addressed transparently and fairly.

4.6. Corrective Action for Perpetrators:

Perpetrators of discrimination or harassment will be subject to corrective actions that correspond to the severity and nature of their actions, with possible outcomes ranging from mandatory training sessions to suspension or termination, based on the incident's specifics. These actions aim not only to address the immediate issue but also to promote understanding and behavioural change. As part of the remediation, perpetrators will receive education on the impact of their behaviour, reinforcing the company's policies and commitment to a respectful, inclusive workplace. This approach aims to foster accountability and prevent recurrence, ensuring alignment with NAP's ethical standards.

4.7. Review and Resolution:

The grievance and remediation process will be completed within a reasonable time frame, with a strong emphasis on ensuring a timely and effective resolution. Once the appropriate remediation actions are implemented, a final resolution will be documented and communicated to both the victim and the perpetrator. This ensures transparency and clarity for all parties involved. Additionally, on-going monitoring will be conducted to ensure the effectiveness of the remediation and to prevent future occurrences of discrimination or harassment. This monitoring process will help maintain a safe and respectful work environment for all stakeholders.

4.8. Training and Awareness Programs:

NAP will provide comprehensive training for all employees, contractors, and management on preventing discrimination and harassment. This training will cover how to report incidents, the remediation process, and strategies to foster an inclusive and respectful workplace. Additionally, employees will receive On-going education to ensure they are informed about their rights and the resources available to them in the event of discrimination or harassment. The company is committed to maintaining a well-informed workforce that understands its role in promoting a safe and respectful environment for all stakeholders.

4.9. Proportionality and Fairness:

The remediation procedure ensures that actions taken to support victims of discrimination or harassment are proportional to the severity of the incident. This includes tailored support, corrective actions, and disciplinary measures that reflect the nature and impact of the issue. All remedies are designed to restore the victim's well-being and maintain a fair and respectful work environment.

4. 10. Transparency and Accountability:

NAP is committed to maintaining transparency throughout the remediation process. Regular updates will be provided to victims, and the steps taken will be documented. All actions will be in line with company policies, and senior management will oversee and review remediation efforts to ensure fairness and effectiveness.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Reduce the number of reported discrimination and harassment cases by 20% annually.	Number of cases reported.	10 cases per year in 2025, down from 12 in 2024.
Ensure 100% of employees and contractors complete discrimination and harassment awareness training.	Percentage of employees and contractors trained.	Maintaining 100% Organized
Achieve 90% victim satisfaction with the remediation process.	Satisfaction survey results.	90% positive feedback on resolution outcomes.
Ensure that all grievances are investigated and resolved within 30 days.	Time taken for investigation and resolution.	Maintaining 100% Organized

6. Distribution

This policy will be communicated to all employees, contractors, and suppliers via the company intranet, during employee orientation sessions, and as part of regular training programs. A copy of the policy will also be included in supplier contracts to ensure all external stakeholders are aware of their obligations regarding discrimination and harassment. Additionally, On-going communication efforts will be made through regular updates and reminders to ensure that all parties are fully informed about their rights and responsibilities in relation to discrimination and harassment issues. This continuous awareness campaign will help foster an environment of respect, accountability, and transparency within NAP.

7. Annual Review

The remediation procedure will be reviewed annually to ensure its continued effectiveness and alignment with NAP's commitment to equality and human rights. During the review, the company will assess key metrics such as the number of grievances reported, resolution times, and the effectiveness of the support provided to victims. The review will also evaluate progress on quantitative objectives, identifying any necessary adjustments to enhance the remediation process. Reports detailing grievance trends, resolutions, and feedback from victims will be compiled and presented to senior management and stakeholders. This annual review will help ensure the company's remediation efforts remain transparent, effective, and responsive to emerging issues.

8. Conclusion

NAP is committed to ensuring that every employee, contractor, and external stakeholder is treated with dignity and respect. Our remediation procedure is designed to provide prompt, fair, and transparent resolution to incidents of discrimination and harassment, with a focus on proportionality and continuous monitoring. By maintaining a strong commitment to human rights and equality, we aim to create a workplace that fosters inclusion, protects individuals from harm, and ensures that every employee can work in an environment free from discrimination, harassment, or abuse.

11. ENERGY CONSUMPTION AND GREENHOUSE GASES POLICY

NAP/ESG/PY/11

1. Introduction

NAP recognizes the urgent need to address the environmental impacts of energy consumption and greenhouse gas (GHG) emissions resulting from our operations. As a responsible manufacturer of plastic injection moulded components and assemblies, we are committed to minimizing our energy consumption, improving our energy efficiency, and significantly reducing our GHG emissions in line with global climate change goals. This policy outlines our approach to energy consumption and GHG reduction across our operations, with a focus on Scope 1 and Scope 2 emissions, which include direct and indirect emissions from our facilities and transport activities. We also outline key roles, responsibilities, and the process of monitoring and improving our energy use and emissions profile.

2. Scope

The scope of this policy covers all operations at NAP, including manufacturing, administration, and transportation activities. It addresses the management of energy consumption and greenhouse gas (GHG) emissions across Scope 1 (direct emissions from company-owned or controlled resources), Scope 2 (indirect emissions from purchased electricity, steam, heating, and cooling), and Scope 3 (emissions across the supply chain, including transport). The policy applies to all employees, contractors, suppliers, and logistics partners, ensuring comprehensive engagement in reducing energy use and GHG emissions within company operations and throughout the value chain.

3. Roles and Responsibilities

3.1. Senior Management:

Senior management is responsible for aligning energy consumption and GHG reduction goals with the company's overall sustainability and ESG objectives. They will allocate necessary resources for energy management and GHG reduction programs, ensuring effective implementation. Senior management will monitor the success of these strategies, taking corrective actions where required and lead by example in promoting energy-saving practices throughout the organization. They will also ensure compliance with all relevant laws, regulations, and industry standards regarding energy usage and emissions. By setting clear priorities, senior management plays a critical role in driving energy efficiency and emission reductions within the company.

3.2. Environmental Sustainability Team:

The Energy Manager is responsible for overseeing the implementation of energy management and GHG reduction strategies within the company. They will set specific, measurable targets for energy consumption and emissions reductions, ensuring alignment with overall sustainability goals. The Energy Manager will track and report progress on energy efficiency and GHG reduction initiatives, ensuring transparency in the process. They will also ensure compliance with environmental regulations and industry standards related to energy use and emissions. If necessary, the Energy Manager will propose and implement corrective actions to ensure that energy and emissions reduction targets are met.

3.3. Operations and Facility Management:

The Facility Manager is responsible for implementing energy-saving initiatives and practices at the facility level, ensuring that energy consumption patterns are regularly assessed for potential improvements. They will ensure the proper functioning and maintenance of energy-efficient equipment, minimizing energy waste. The Facility Manager will collaborate with suppliers to identify more energy-efficient alternatives for raw materials and components, contributing to the overall reduction in energy consumption. Additionally, they will support the Environmental Sustainability Team in collecting data and monitoring energy consumption and emissions, ensuring that the company's energy and GHG reduction goals are effectively achieved.

3.4. Transport and Logistics Team:

The Logistics Manager will ensure that logistics operations are optimized to minimize fuel consumption and emissions by implementing efficient transport routes and adopting energy-saving practices. They will work closely with external logistics partners to ensure that all transport activities align with NAP's energy and GHG reduction objectives. The manager will also be responsible for tracking and reporting energy consumption and GHG emissions from transport activities, ensuring that data is accurately collected and analysed. This will help monitor progress toward the company's sustainability goals and ensure compliance with energy and emissions-related policies.

3.5. Employees:

Employees are expected to actively participate in energy-saving initiatives and remain mindful of their energy usage during daily operations. They are encouraged to report any inefficiencies or potential energy-saving opportunities to the relevant departments for further evaluation and action. Additionally, employees must complete any required training on energy efficiency and GHG reduction practices to ensure they understand their role in the company's sustainability efforts. Compliance with NAP's policies and practices related to energy consumption and emissions reduction is mandatory to help the company achieve its environmental goals and contribute to a more sustainable future.

4. Energy Consumption and Greenhouse Gases Policy

4.1. Energy Efficiency:

Implement advanced energy-efficient technologies across operations, focusing on high-efficiency equipment, machinery, and processes. Upgrade lighting systems to LED, utilize energy-saving devices, and streamline production processes to minimize waste. The goal is to reduce overall energy consumption by increasing operational efficiency and lowering energy use per unit of production. Employees will receive on-going training on energy efficiency practices, and regular reviews will ensure these practices are followed consistently. Furthermore, periodic energy-saving challenges will be organized to encourage everyone's participation and further reduce consumption.

4.2. Renewable Energy:

Invest in renewable energy sources such as solar panels, wind turbines, and biogas to transition from fossil fuels. Renewable energy will reduce our carbon footprint and dependence on non-renewable energy sources. Implementing solar and wind energy systems will be a key strategy in achieving our sustainability goals. These systems will be integrated into our facilities to meet operational needs, with excess energy stored for future use or fed back into the grid. The shift to renewable energy sources will help mitigate the environmental impact of energy consumption, providing a cleaner and more sustainable solution for long-term growth.

4.3. Energy Audits:

Regular energy audits will be conducted to evaluate energy use across all departments and identify areas for improvement. Energy consumption patterns will be closely analysed, and inefficiencies will be addressed to optimize energy usage. The audits will identify high-energy-consuming processes and suggest improvements, such as the use of energy-efficient equipment, insulation, or process adjustments. Audit findings will be used to set targets for energy savings and to track progress annually. Additionally, audits will ensure that energy management practices align with best industry standards, helping us identify opportunities for further reductions in energy consumption.

4.4. Employee Engagement:

Employees will be actively involved in reducing energy consumption by adopting energy-saving practices both at work and at home. Training programs will be provided to educate employees on best practices, such as turning off lights when not in use, using energy-efficient devices, and optimizing machine usage. A culture of energy awareness will be fostered through workshops, challenges, and rewards for teams or individuals who meet energy-saving goals.

The involvement of employees is critical to the success of the energy efficiency program, as they can provide insights and implement changes that lead to measurable reductions in energy consumption.

4.5. Monitoring:

Real-time monitoring of energy consumption will be implemented across operations to ensure that energy use is tracked efficiently. Smart meters and sensors will be deployed to collect data, which will be analysed to understand consumption patterns. This data will be used to identify areas where energy is being wasted and to track improvements over time. Additionally, the energy management system will provide alerts when consumption exceeds set thresholds, enabling prompt action to correct inefficiencies. Regular analysis will allow the company to adapt its energy strategies to meet dynamic needs and improve performance in line with energy and GHG reduction goals.

4.6. Energy Conservation:

Non-essential energy use will be minimized during off-peak hours, such as evenings or weekends. For example, lighting and HVAC systems will be reduced in areas not in use, and machinery will be powered down when not actively needed. These measures will be part of an overarching strategy to cut down on idle energy consumption, leading to significant cost savings and reduced environmental impact. Departments will be encouraged to implement energy-saving actions like adjusting operational schedules to reduce energy demand during peak times. The company will also implement energy use policies that guide staff on energy conservation practices at all levels of operation.

4.7. Emission Reduction:

The company will implement strategies aimed at reducing Scope 1, 2, and 3 GHG emissions. For Scope 1, efforts will focus on improving energy efficiency in on-site operations and reducing direct emissions from our facilities. For Scope 2, we will transition to renewable energy sources for electricity. Scope 3 emissions will be addressed by working with suppliers, customers, and logistics providers to reduce indirect emissions. The company will set specific, measurable targets for emission reductions, including carbon footprint assessments, and track progress through detailed monitoring of emission sources. Regular reports will ensure transparency and accountability in meeting these targets.

4.8. Fuel Efficiency:

Fuel consumption will be optimized by adopting fuel-efficient logistics and transportation strategies. The company will work with external logistics partners to ensure that the transport fleet meets high fuel-efficiency standards, such as using hybrid or electric vehicles where feasible. Routes will be optimized to reduce fuel use and emissions, and regular vehicle maintenance will be conducted to ensure optimal performance. In addition, logistics operations will be integrated with our broader sustainability goals, aiming for the reduction of emissions from transportation and improved fuel efficiency. The company will also explore alternative fuels and consider electric fleet expansion for both operational and transport needs.

4.9. Sustainable Design:

New buildings and facilities will be designed with energy-efficient features in mind. Sustainable design principles will include passive solar heating, natural cooling systems, energy-efficient insulation, and the use of renewable energy technologies like solar panels. Buildings will be designed to optimize natural light, reducing the need for artificial lighting, and HVAC systems will be optimized for energy efficiency. Moreover, existing facilities will undergo retrofits to incorporate energy-efficient upgrades. This sustainable approach will reduce long-term energy consumption, decrease operational costs, and contribute to the company's overall GHG reduction goals. All new construction projects will follow these energy-efficient design guidelines.

4.10. Compliance:

The company is committed to ensuring compliance with all relevant energy regulations and GHG emission standards. This includes adhering to national and international laws on energy use, emissions, and sustainability. Compliance will be monitored through regular reviews, audits, and inspections to ensure that all practices align with legal and regulatory requirements. Any changes in local or international laws will be incorporated into the company's operations to ensure on-going compliance. Furthermore, the company will proactively participate in sustainability initiatives, certifications, and voluntary agreements that help exceed regulatory requirements, thus enhancing its environmental responsibility and positioning in the market.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Reduce energy consumption per unit of production by 10% over the next 5 years.	kWh per unit of production.	1.2 kWh/unit
Achieve a 15% reduction in Scope 1 and Scope 2 GHG emissions over the next 5 years.	Metric tons of CO_2e.	5,000 metric tons of CO_2e
Increase renewable energy usage to 30% of total energy consumption	Percentage of total energy consumption.	30%
Reduce Scope 3 emissions from transportation by 20% over the next 5 years.	Metric tons of CO_2e from transportation.	1,000 metric tons of CO_2e

6. Distribution

The policy will be communicated internally through email, the company intranet, and dedicated training sessions. It will also be included in the employee handbook and during new employee orientation programs. For external communication, suppliers and contractors will receive the policy as part of their contractual agreements and are encouraged to adopt similar energy management and GHG reduction practices. To ensure continued engagement, the company will maintain an on-going communication strategy, regularly updating all stakeholders on energy consumption, GHG reduction efforts, and progress toward sustainability goals. This ensures alignment and fosters a collaborative approach to environmental responsibility.

7. Annual Review

The annual review will focus on evaluating energy consumption patterns and the progress made in reducing GHG emissions. This includes assessing the achievement of the quantitative objectives set for energy use and emissions reductions. The review will also identify opportunities for continuous improvement by exploring new technologies and strategies to enhance energy efficiency and further reduce GHG emissions. Additionally, stakeholder engagement will be an essential part of the process, involving feedback from employees, suppliers, and contractors. This collaborative approach will ensure that all parties are aligned and motivated to contribute to the company's sustainability goals.

8. Conclusion

NAP is fully committed to reducing its energy consumption and GHG emissions, recognizing that sustainable operations are essential to the well-being of the environment, society, and future generations. This policy reflects our dedication to integrating energy efficiency and emissions reduction strategies throughout our operations, while engaging stakeholders in our efforts to achieve a sustainable future. Through this policy, we will continue to make substantial progress towards achieving our energy and GHG objectives, reducing our environmental impact, and enhancing the sustainability of our operations.

12. WATER POLICY

NAP/ESG/PY/12

1. Introduction

NAP is committed to sustainable water management practices that ensure responsible use of water resources, reduce pollution, and mitigate water-related environmental risks. As a manufacturer of plastic injection moulded components and assemblies, we recognize the importance of water as a vital resource for both operational processes and community well-being. Our commitment to water stewardship is aligned with our Environmental, Social, and Governance (ESG) principles, and this policy sets out the framework for managing water consumption and addressing water pollution throughout our operations. We will work proactively to conserve water, reduce waste, and improve water quality by implementing advanced technologies and practices across all company facilities. We are committed to aligning with global best practices and local regulations, ensuring the efficient use of water while safeguarding environmental and social responsibilities.

2. Scope

This policy applies to all NAP operations, including manufacturing facilities, warehouses, administrative offices, and other locations under our control. It covers all aspects of water use and pollution, including water consumption, discharge, recycling, and wastewater treatment. The policy will also address the impact of the company's activities on local water resources and align with relevant environmental regulations, including water quality standards and discharge limits.

3. Roles and Responsibilities

3.1. Board of Directors:

The management team is responsible for approving the Water Management Policy and ensuring its alignment with corporate sustainability goals and ESG principles. They will allocate the necessary resources and support to implement the policy effectively across all operations. The team will oversee the monitoring and review of water management performance, ensuring that progress is made toward achieving the quantitative objectives set in the policy. An annual review will be conducted to assess the effectiveness of water conservation efforts, identify areas for improvement, and ensure that the company remains on track to meet its water management goals and ESG commitments.

3.2. Senior Management:

The department head is responsible for ensuring that water management practices are integrated into the company's strategic goals and operational framework. They will lead the implementation of the Water Management Policy across all departments, ensuring that relevant teams adopt water conservation practices and pollution reduction measures. The department head will ensure that robust monitoring and reporting systems are in place to track water usage, waste, and conservation efforts. Regular reviews of water consumption data will be conducted to assess compliance with established goals, identify trends, and recommend corrective actions when necessary to improve water efficiency and reduce environmental impact.

3.3. Environmental Sustainability Team:

The Water Management Coordinator will oversee all water-related initiatives across the company, ensuring alignment with the Water Management Policy. They will monitor key water consumption metrics and track water discharge data to ensure compliance with company goals. The coordinator will implement water conservation technologies, such as water recycling systems and efficient usage practices, while also enforcing measures to control and reduce water pollution. They will work closely with departments to ensure operational changes that minimize water waste. Annual reports will be developed to assess progress toward water management targets, providing recommendations for continuous improvement based on data analysis.

3.4. Operations and Manufacturing Teams:

The Water Management Operators will implement water-saving measures across the facility, focusing on reducing water usage and minimizing wastewater generation. They will closely monitor water consumption and wastewater outputs, ensuring they are accurately reported to the Environmental Sustainability Team on a regular basis. These operators will adhere to established water management practices and identify opportunities to improve efficiency, such as optimizing equipment usage or upgrading infrastructure. Any inefficiencies, issues, or violations of water management standards will be promptly reported for corrective action. Their efforts will support the company's broader goal of sustainable water usage and pollution prevention.

3.5. Employees:

Employees will actively participate in water conservation and pollution prevention training to enhance awareness and skills related to efficient water usage. They will follow established water-saving procedures in their daily operations, ensuring minimal water wastage and proper management. Any leaks, inefficiencies, or areas of water wastage will be promptly reported to the relevant authorities to prevent unnecessary consumption.

Employees will also contribute to the company's on-going water conservation awareness efforts, participating in water-saving initiatives and supporting sustainability goals. Their involvement ensures that water management practices are continuously improved across the organization, aligning with NAP's commitment to responsible water use.

4. Water Policy

4.1. Water Consumption Reduction:

NAP is committed to reducing water consumption across all operations. By adopting water-saving technologies and efficient practices, we aim to minimize water use without compromising production quality. Regular water audits will identify inefficiencies and highlight opportunities for improvement. Departments will set specific water reduction targets, with company-wide initiatives focused on using water more sustainably. Employees will be encouraged to adopt water-efficient practices in their daily operations, and we will explore alternatives like rainwater harvesting to reduce reliance on municipal water.

4.2. Water Recycling and Reuse:

We aim to recycle and reuse water in all areas of our operations to reduce dependency on fresh water sources. Wastewater from production processes will undergo treatment to meet safety standards, enabling it to be reused in non-potable applications, such as cooling and landscaping. New technologies for water filtration and purification will be employed to maximize recycling efficiency. A dedicated team will monitor recycling systems to ensure continuous improvement and aim for significant portions of water usage to be met through recycled water. This initiative is key to improving resource efficiency across the organization.

4.3. Wastewater Treatment and Pollution Prevention:

NAP will implement and maintain a wastewater treatment system that ensures compliance with environmental and legal discharge standards. Effluent will be treated to remove harmful substances, ensuring that water discharged into the environment meets regulatory guidelines. Regular testing of wastewater quality will ensure consistent results. We will also train employees in waste management practices, emphasizing the importance of preventing contamination of water sources during production processes. Proactive measures will be taken to avoid any incidents that could lead to water pollution or affect local ecosystems.

4.4. Employee Awareness and Engagement:

NAP recognizes the importance of employee involvement in water management. Regular training programs will be provided to educate employees on water-saving techniques, pollution prevention, and water management best practices. Employees will be encouraged to identify and report water wastage or inefficiencies within their departments. Awareness campaigns will be launched to foster a culture of sustainability. By empowering employees with the knowledge and tools to make a difference, we aim to reduce water consumption and improve water quality throughout the organization.

4.5. Sustainable Water Use in Supply Chain:

NAP will collaborate with suppliers to ensure sustainable water management practices. Suppliers will be required to adopt responsible water usage, treatment, and recycling measures. The company will engage suppliers in water efficiency programs, offering guidance on reducing water footprints in their operations. Regular audits will assess supplier compliance with water management policies. We aim to influence our entire supply chain to minimize water consumption and ensure that all raw materials used are sourced in a way that aligns with our water sustainability goals.

4.6. Water Risk Management:

NAP will conduct a comprehensive water risk assessment to understand potential risks related to water availability and pollution that could affect our operations. By identifying areas with high water scarcity or potential contamination risks, the company can proactively address water-related challenges. The risk assessment will help the company prioritize water conservation efforts in vulnerable areas, implement contingency plans, and ensure business continuity during water crises. We will continuously monitor emerging water risks and adapt strategies accordingly to mitigate any potential impact on operations.

4.7. Water Usage Monitoring and Reporting:

We will implement a robust system for monitoring water consumption across all facilities. Real-time tracking systems will provide detailed insights into water usage patterns and help identify areas of inefficiency. Regular reporting will be conducted to measure progress against water reduction targets. Water data will be analyzed to develop strategies for continuous improvement. Reports will be shared with internal teams and external stakeholders, ensuring transparency and accountability in our water management efforts. Our goal is to achieve a noticeable reduction in water consumption year over year.

4.8. Compliance with Water Regulations:

NAP is committed to adhering to all local, national, and international water-related laws and regulations. The company will ensure compliance with water conservation, pollution control, and wastewater discharge standards. Regular reviews of environmental laws will be conducted to stay updated on regulatory changes. We will maintain a strong relationship with regulatory bodies and work collaboratively to meet evolving standards. Compliance will be ensured through consistent internal audits and corrective actions to address any identified shortcomings in water management practices.

4.9. Innovation and Water-Saving Technologies:

NAP will actively invest in the latest technologies to improve water efficiency and conservation across all operations. We will explore cutting-edge solutions, such as water-saving machinery, advanced filtration systems, and closed-loop water systems, to reduce water consumption. Research and development will be prioritized to discover innovative ways to recycle and reuse water, ensuring that our operations are as sustainable as possible. Partnerships with external experts will be sought to stay at the forefront of water management practices and improve overall water efficiency.

4.10. Quantitative Objectives and Performance Metrics:

Specific, measurable objectives will be set to track water consumption and wastewater management performance. Key performance indicators (KPIs) will include water usage reduction targets, volume of water recycled, and reductions in effluent discharge. Targets will be reviewed regularly, and progress will be monitored using real-time data. The company will set annual water consumption reduction goals based on historical consumption levels and expected operational growth. These objectives will be closely aligned with NAP's broader sustainability and ESG goals, with progress reports shared annually to ensure accountability.

5 Qualitative Objectives

Qualitative Objective	Unit of Measure	Target Value
Achieve a reduction in water usage per unit of production.	Liters of water consumed per unit of production.	Reduce water consumption by 15% per unit of production over the next 3 years.
Increase the proportion of water recycled and reused in our operations.	Percentage of total water used that is recycled or reused.	Achieve 30% of total water used being recycled or reused by 2026.

Reduce the quantity of untreated wastewater being discharged into the environment.	Liters of untreated wastewater discharged per month.	Decrease untreated wastewater discharge by 20% by 2026.
Ensure that all discharged water meets regulatory and environmental quality standards.	Water quality tests (e.g., pH, suspended solids, chemical oxygen demand).	Maintain all discharge water quality parameters within acceptable legal limits, with a target of 100% compliance with regulatory standards.
Increase employee awareness and participation in water-saving initiatives.	Percentage of employees trained on water conservation practices.	Train 100% of employees in water conservation practices by 2025.

6. Distribution

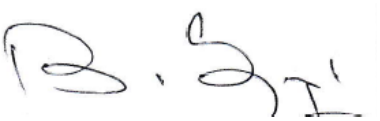
The Water Management Policy will be distributed to all employees via email, the company intranet, and included in the employee handbook. It will be incorporated into the onboarding process for new employees to ensure full understanding and adherence. Suppliers, contractors, and other relevant stakeholders will receive the policy as part of their contractual agreements, ensuring they align with the company's water conservation and pollution prevention efforts. Additionally, periodic reminders and updates will be shared to reinforce the policy's key principles and objectives, fostering continued awareness and commitment to responsible water management throughout the organization.

7. Annual Review

The Water Management Policy will undergo an annual review to assess its effectiveness in meeting objectives and addressing water consumption and pollution issues. This review will evaluate progress against set targets, identify areas for improvement, and ensure alignment with current regulations and best practices. Input from relevant stakeholders, including employees, suppliers, and environmental experts, will be considered to enhance the policy. The findings of the review will guide any necessary updates or revisions to the policy and its implementation strategy. The annual review will ensure continuous improvement and the on-going commitment of NAP to sustainable water management.

8. Conclusion:

NAP's Water Management Policy reflects our commitment to environmental stewardship and sustainable water use. Through efficient water management, conservation, and pollution reduction strategies, we aim to reduce our water footprint, contribute to water sustainability, and ensure the long-term availability of water resources. By integrating these practices into our daily operations and continuously improving our systems, we will help build a sustainable future while maintaining compliance with relevant laws and regulations.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13. BIODIVERSITY POLICY
NAP/ESG/PY/13

1. Introduction

NAP is committed to minimizing its environmental impact and supporting biodiversity conservation as part of its sustainability efforts. We recognize the importance of reducing non-GHG atmospheric pollutants, such as SOx, NOx, VOCs, particulate matter (PM), and dust, to protect both the local environment and global ecosystems. This policy outlines our objectives, responsibilities, and actions to address these environmental concerns, focusing on our commitment to reducing pollutants, protecting local ecosystems, species diversity, and supporting animal welfare. Our commitment to sustainability is integrated into our Environmental, Social, and Governance (ESG) objectives, and we aim to ensure that our operations contribute to a sustainable future for both people and the planet.

2. Scope

The scope of this Biodiversity and Environmental Policy covers all aspects of NAP's operations, including manufacturing processes, resource usage, waste management, air emissions, and biodiversity conservation efforts. It applies to all employees, departments, suppliers, and contractors involved in our operations. The policy addresses the reduction of non-GHG atmospheric pollutants (SOx, NOx, VOCs, PM, dust), the protection of local ecosystems and biodiversity, and the promotion of animal welfare within our direct operations. It also focuses on ensuring compliance with relevant environmental regulations and industry standards while promoting sustainable practices across the supply chain.

3. Roles and Responsibilities

3.1. Board of Directors and Senior Management:

The management is responsible for approving the Biodiversity and Environmental Policy, ensuring it aligns with the company's sustainability goals and corporate strategy. They will allocate necessary resources, including financial and human capital, to support biodiversity conservation efforts and pollution reduction initiatives. The management will ensure that biodiversity-related objectives are integrated into the company's overall ESG strategy, aligning environmental practices with social responsibility goals. Additionally, they will regularly review and monitor the policy's effectiveness and ensure compliance with national and international regulations, making adjustments to continuously improve the company's environmental performance and minimize negative impacts.

3.2. Environmental Sustainability Team:

The environmental management team will implement the biodiversity and air quality policy across the organization, ensuring that all operations align with sustainability objectives. They will track and report progress toward meeting environmental goals, particularly regarding biodiversity conservation and air quality improvement. Compliance with relevant laws and industry standards will be ensured, with regular assessments and audits. The team will develop strategies focused on habitat restoration, pollution reduction, and air quality management. They will also promote waste reduction initiatives to minimize environmental impact, ensuring the company contributes to preserving biodiversity and improving air quality in its operations and beyond.

3.3. Facility and Operations Managers:

The operational team will ensure strict adherence to environmental and biodiversity policies in daily operations. They will implement best practices to reduce atmospheric emissions, such as minimizing pollutants like NOx, SOx, and VOCs, while also enhancing biodiversity conservation efforts through habitat protection and sustainable practices. Regular environmental audits will be conducted to assess current practices, identify areas of improvement, and ensure compliance with the company's sustainability goals. These audits will help in continuously refining strategies to mitigate environmental impact, improve operational efficiency, and enhance the company's contribution to biodiversity conservation and pollution reduction.

3.4. Employees:

Employees are expected to follow established procedures and practices to minimize environmental impact, focusing on waste management, pollution reduction, and biodiversity preservation. This includes implementing measures to reduce emissions, prevent contamination, and protect local habitats. Employees must actively report any inefficiencies, pollution incidents, or issues that may negatively affect local ecosystems or biodiversity. By promptly identifying and addressing environmental concerns, employees help ensure the company's operations align with sustainability objectives, contributing to the overall preservation of biodiversity and minimizing the company's environmental footprint. Continuous improvement through reporting and accountability is key to the success of these initiatives.

4. Biodiversity Policy

4.1. Biodiversity Protection:

NAP is committed to assessing the impact of its operations on local ecosystems and species, taking proactive steps to minimize habitat destruction, water pollution, and soil contamination. We prioritize the preservation of natural habitats and will actively contribute to local conservation efforts.

The company supports initiatives aimed at the rehabilitation of degraded ecosystems and the restoration of biodiversity. By integrating these practices into our operations, we aim to ensure that our activities have a minimal negative effect on the environment, fostering a balance between industrial progress and ecological well-being for future generations.

4.2. Atmospheric Pollutants Reduction:

We are committed to continuously monitoring and reducing air pollutants such as SOx, NOx, VOCs, PM, dust, and other harmful emissions from our operations. Regular air quality audits will be conducted at all facilities to ensure compliance with relevant environmental regulations and to identify opportunities for improvement. We will integrate technologies and processes that minimize air emissions, including advanced filtration systems, cleaner fuels, and energy-efficient practices. By proactively managing air quality, we aim to minimize our environmental impact and contribute to a cleaner, healthier atmosphere for the communities surrounding our operations.

4.3. Animal Welfare:

We are committed to complying with all relevant animal welfare legislation and adhering to best practices for the treatment of animals in our operations. Any animal-related activities within the company will strictly follow humane standards, ensuring the well-being and ethical treatment of animals. We will provide comprehensive training to our employees on animal welfare practices, ensuring they fully understand their ethical and legal obligations in relation to animal care. Through continuous education and adherence to high standards, we aim to promote responsible and compassionate practices across all operations involving animals.

4.4. Energy and Water Use Reduction:

We are committed to minimizing energy and water consumption in our operations to reduce indirect impacts on local ecosystems and habitats. By optimizing the use of resources, we aim to lessen the strain on local environments and mitigate potential damage to surrounding biodiversity. The efficient use of energy and water will also contribute to reducing our carbon footprint, which in turn helps protect ecosystems from the adverse effects of resource depletion. Our on-going efforts will focus on adopting sustainable practices that ensure minimal environmental impact and the preservation of local biodiversity for future generations.

4.5. Pollution Management and Waste Reduction:

NAP is committed to enhancing waste management programs to reduce hazardous waste and minimize its impact on biodiversity. We will prioritize waste segregation, recycling, and reuse to divert waste from landfills and reduce environmental harm. Our focus will be on implementing pollution reduction initiatives that target emissions at the source, employing cleaner production technologies that lower pollution levels.

By adopting sustainable waste management practices and continuously improving our environmental footprint, we aim to protect local ecosystems, prevent contamination, and contribute to the preservation of biodiversity while aligning with our broader ESG objectives.

4.6. Local Environmental Engagement:

NAP is committed to collaborating with local communities, environmental organizations, and authorities to identify and implement joint environmental stewardship programs. We will actively participate in local environmental initiatives that focus on biodiversity conservation, pollution control, and ecosystem restoration. By working together with stakeholders, we aim to address local environmental challenges and contribute to the protection and enhancement of natural habitats. Our partnership efforts will support sustainable development, strengthen community engagement, and ensure that our operations are aligned with broader environmental and biodiversity goals, fostering long-term ecological health in the areas where we operate

4.7. Sustainable Supply Chain:

NAP will collaborate with our suppliers and partners to promote sustainable sourcing practices that minimize environmental harm and protect biodiversity. We will actively encourage our supply chain to adopt responsible practices, including sustainable farming, forestry, and fishing methods that reduce ecosystem degradation. By working closely with our suppliers, we aim to ensure that the raw materials we use come from sustainable sources, helping to preserve biodiversity and natural resources. Our commitment extends to setting clear expectations for sustainability, fostering long-term environmental stewardship, and ensuring that our supply chain contributes positively to ecosystem health and sustainability.

4.8. Research and Innovation:

NAP will invest in research and development to create products and processes that minimize environmental impact and promote biodiversity. Our R&D efforts will focus on identifying alternatives to harmful chemicals, reducing resource consumption, and developing innovative solutions that enhance sustainability. By exploring eco-friendly materials and efficient manufacturing techniques, we aim to reduce our environmental footprint while contributing to the preservation of ecosystems and species. Through continuous innovation, we are committed to developing products that not only meet market needs but also support biodiversity conservation and environmental sustainability in the long term.

4.9. Employee Education and Training:

NAP will provide comprehensive training to all employees on the importance of biodiversity and environmental stewardship. This training will focus on best practices for pollution reduction, habitat conservation, and responsible resource management. Employees will be educated on how their actions can positively impact local ecosystems, reduce environmental footprints, and support the company's sustainability goals. By fostering awareness and understanding, we aim to empower our workforce to make informed decisions, adopt eco-friendly practices, and actively contribute to the company's efforts in protecting biodiversity and promoting environmental sustainability across all operational areas.

4.10. Stakeholder Communication:

NAP is committed to maintaining transparency by regularly communicating our biodiversity goals and performance to all stakeholders, including employees, suppliers, local communities, and regulatory bodies. We will provide regular updates through reports that detail our progress toward achieving biodiversity conservation and pollution reduction objectives. These reports will include data on air quality, water conservation, waste management, and biodiversity preservation efforts. By sharing our achievements and challenges, we aim to foster trust, accountability, and collaboration, ensuring that all stakeholders are informed and involved in our environmental sustainability initiatives.

5. Quantitative Objectives

Qualitative Objective	Unit of Measure	Target Value
Minimize land-use changes and habitat degradation	Area (hectares)	Reduce by 10% annually
Promote the restoration of native plant species in surrounding areas	Number of species	Increase by 15 species per year
Reduce soil contamination from operations	Soil quality index (scale 1-10)	Improve by 1 point per year
Ensure better support for local wildlife through conservation efforts	Number of species observed	Increase by 10% by 2026
Improve water quality and prevent pollution runoff into ecosystems	Concentration (ppm)	Reduce emissions by 5% annually

6. Distribution

NAP will ensure that the Biodiversity and Environmental Policy is effectively distributed to all stakeholders. Internally, the policy will be shared via email, training sessions, the company intranet, and incorporated into the employee handbook, with discussions held during employee orientation. Externally, the policy will be communicated to contractors, suppliers, and other stakeholders, promoting the adoption of similar environmental practices. Ongoing communication will be maintained through regular newsletters, updates, and progress reports, ensuring continuous engagement and awareness of our biodiversity and environmental initiatives. This will help foster collaboration and shared responsibility for sustainability goals.

7. Annual Review

The Biodiversity and Environmental Policy will undergo an annual review to evaluate its effectiveness and make necessary adjustments. The review will be based on progress towards quantitative objectives, feedback from employees, suppliers, and stakeholders, changes in environmental laws and regulations, new technological innovations, and updates to corporate sustainability and ESG strategies. The Environmental Sustainability Team, in collaboration with senior management, will conduct the review. The results of the review will be communicated to all relevant stakeholders to ensure transparency, continuous improvement, and alignment with evolving environmental standards and organizational goals.

8. Conclusion

NAP acknowledges the critical role biodiversity and the reduction of non-GHG air pollutants play in supporting local ecosystems, communities, and future generations. Through this policy, we commit to the responsible use of resources, minimizing pollution, and protecting biodiversity across all operations. Our focus is on enhancing environmental stewardship, ensuring sustainable practices, and reducing the impact of our activities on air quality and natural habitats. We strive to promote a cleaner, healthier environment, aligning our business objectives with the protection of ecosystems and the long-term well-being of both nature and society.

14. AIR POLLUTION
NAP/ESG/PY/14

1. Introduction

NAP is dedicated to minimizing its environmental impact by reducing air pollution from its operations. As a manufacturer of plastic injection-moulded components and assemblies, we recognize the significant effects that air pollutants such as sulfur oxides (SOx), nitrogen oxides (NOx), volatile organic compounds (VOCs), particulate matter (PM), and dust can have on the environment and public health. Through this Air Pollution Policy, we commit to implementing effective measures to reduce these emissions, improve air quality, and uphold the highest standards of environmental stewardship, in line with our broader sustainability and ESG goals.

2. Scope

This Air Pollution Policy applies to all manufacturing operations, facilities, and activities under NAP , including all manufacturing units and production plants involved in the creation of plastic injection-moulded components and assemblies, transportation and logistics operations related to the delivery of materials and finished goods, waste management and disposal activities, and any operations that generate or manage air pollutants. Additionally, it encompasses any other activities or processes across the company's operations that may result in air pollution, atmospheric emissions, or contribute to poor air quality, impacting both the local environment and surrounding communities.

3. Roles and Responsibilities

3.1. Board of Directors:

The Board of Directors will approve the Air Pollution Policy, ensuring it aligns with NAP's sustainability and ESG objectives. They will provide oversight to guarantee that adequate resources, both financial and operational, are allocated to implement the policy effectively. The Board will regularly review the company's progress in reducing air pollution, ensuring that set targets are met and any necessary adjustments are made. They will ensure that the policy remains relevant and supports the company's commitment to minimizing its environmental impact, particularly in relation to air quality and atmospheric emissions.

3.2. Environmental Sustainability Team:

The Environmental Sustainability Team will lead the development and implementation of air pollution reduction strategies across all operations. They will monitor and report on air quality and emissions data, ensuring accurate tracking of pollutants. The team will ensure compliance with both local and international regulations related to air quality and pollution control. They will also conduct regular audits of air pollution sources and evaluate the effectiveness of pollution control measures in place. The team will collaborate with other departments to identify areas for improvement and implement necessary actions to reduce air pollution, contributing to the company's sustainability goals.

3.3. Operations and Production Managers:

Operations and Production Managers will implement the company's air pollution reduction strategies within their respective departments, ensuring adherence to all environmental policies. They will monitor emissions from production processes and take proactive measures to control and reduce pollutants. These managers will coordinate the maintenance and calibration of equipment designed to manage air quality, including air filtration systems and other pollution control technologies. They will also identify areas for improvement and collaborate with the Environmental Sustainability Team to address any operational inefficiencies that could result in increased emissions, ensuring continuous compliance with air pollution reduction goals.

3.4. Employees:

Employees will actively participate in training programs focused on pollution reduction and air quality management to enhance their understanding of environmental practices. They will follow operational guidelines and best practices that contribute to minimizing emissions and air pollution within their areas of responsibility. Employees are encouraged to report any air quality issues, inefficiencies, or pollution-related incidents, ensuring timely corrective actions are taken. By adhering to these practices, employees play a key role in supporting NAP's commitment to reducing air pollution and maintaining a cleaner, healthier environment for both the company and the surrounding communities.

4. Air Pollution Policy

4.1. Policy Objective:

The objective of the Air Pollution Policy is to mitigate air pollution from NAP's operations. The company is committed to reducing emissions of non-GHG pollutants, including particulate matter (PM), nitrogen oxides (NOx), sulfur oxides (SOx), volatile organic compounds (VOCs), and other atmospheric pollutants. The goal is to enhance air quality both within company facilities and in the surrounding environment, promoting a sustainable and responsible approach to manufacturing and operations.

4.2. Scope of Application:

The policy applies to all manufacturing facilities, logistics operations, waste management activities, and any other activities that generate air pollutants. This includes processes such as plastic injection molding, transportation, and waste disposal. It covers all direct operations, and external contractors involved in activities contributing to air emissions.

4.3. Roles and Responsibilities:

The Board of Directors is responsible for approving the policy and ensuring resources are allocated for its implementation. The Environmental Sustainability Team will lead the strategy, monitor air quality, and ensure compliance with laws. Operations and Production Managers will implement strategies within their departments, ensuring emissions are controlled. Employees must adhere to guidelines, report pollution incidents, and participate in training programs.

4.4. Air Pollution Reduction Goals:

The company sets clear quantitative goals to reduce air pollution, such as reducing particulate matter emissions by 15%, NOx emissions by 10%, and SOx emissions by 20% within 3 years. VOC emissions will be reduced by 25% through improved production processes. The company will also focus on implementing cleaner technologies and transitioning to lower-emission fuel sources to achieve these goals.

4.5. Pollution Control Measures:

NAP will implement advanced filtration systems, dust collection units, and emission control technologies. Regular inspections and audits will be conducted to maintain these systems. Air quality monitoring will be performed at all production facilities to track progress, identify pollution sources, and ensure pollutants like PM, SOx, and NOx are kept within acceptable levels. Cleaner production methods will be prioritized to reduce emissions at the source.

4.6. Compliance with Regulations:

The company will comply with all relevant air quality regulations, including national and international standards. These regulations will be regularly reviewed, and necessary adjustments will be made to ensure full compliance. The Environmental Sustainability Team will stay updated on changes in air quality regulations and ensure that the company's practices align with legal requirements to avoid penalties and ensure environmental protection.

4.7. Employee Involvement and Training:

Employees are crucial to the success of this policy and will be trained in pollution reduction practices. Training will cover air quality management, efficient use of resources, and environmental stewardship. Employees will also learn how to identify and report inefficiencies or air quality issues. Continuous engagement through awareness programs will ensure active participation in pollution reduction efforts across all levels of the company.

4.8. Technological Innovation:

NAP will invest in research and development to adopt new technologies that reduce air pollution. The company will focus on innovative manufacturing processes, cleaner production techniques, and air filtration systems. On-going assessments will be carried out to evaluate new technologies that can further minimize emissions, with an emphasis on sustainable manufacturing practices that benefit both the environment and operational efficiency.

4.9. Monitoring and Reporting:

Regular monitoring and reporting of air quality levels will be conducted across all facilities. The Environmental Sustainability Team will track air emissions, including PM, NOx, SOx, and VOCs, to assess compliance and identify areas for improvement. Quarterly reports will be provided to stakeholders, with transparency about progress toward emission reduction targets. Any non-compliance or issues will be addressed promptly, with corrective actions implemented.

4.10. Annual Review and Continuous Improvement:

This Air Pollution Policy will undergo an annual review to assess its effectiveness. The review will include evaluating the progress of quantitative objectives, analyzing air quality data, obtaining feedback from employees, and reviewing compliance with air quality standards. Adjustments will be made based on this review to improve strategies, incorporate new technologies, and set new targets. Continuous improvement is a cornerstone of the policy to reduce air pollution and enhance environmental performance.

5. Quantitative Objectives

Qualitative Objective	Unit of Measure	Target Value
Reduce sulfur oxides emitted during manufacturing processes	Grams of SOx per unit	Decrease by 10% annually
Minimize nitrogen oxides emissions through cleaner technology	Grams of NOx per unit	Reduce by 12% annually
Reduce volatile organic compounds in paint, adhesives, etc.	Grams of VOC per unit	Decrease by 15% annually
Improve particulate matter filtration and dust collection	Grams per cubic meter	Reduce by 20% over 5 years
Reduce noise levels by optimizing machinery and production schedules	Decibel (dB) level	Maintain below 65 dB in production areas

6. Annual Review

The Air Pollution Policy will undergo an annual review to evaluate its effectiveness and ensure continuous improvement. The review will assess progress toward achieving quantitative objectives, compliance with air quality regulations, and the implementation of pollution reduction measures. Feedback from employees, local communities, and stakeholders will be incorporated, along with updates on technological advancements and changes in environmental laws. Senior management and the Environmental Sustainability Team will lead the review process. The findings and any necessary adjustments to the policy will be communicated to all relevant stakeholders to maintain transparency and drive continuous progress in air quality management.

7. Distributions:

The Air Pollution Policy will be distributed to all relevant stakeholders within NAP to ensure widespread understanding and compliance. Internal distribution will include all employees through the company intranet, email, and during training sessions. It will also be included in the employee handbook and discussed during on boarding. Externally, the policy will be communicated to contractors, suppliers, and third-party partners through official communications, including contracts and meetings. Regular updates and progress reports will be shared with all stakeholders to ensure on-going engagement, awareness, and alignment with the company's commitment to air pollution reduction and environmental stewardship.

8. Conclusion

NAP is committed to reducing air pollution from its operations and ensuring compliance with relevant environmental regulations. By focusing on continuous improvement and collaboration with internal and external stakeholders, we will reduce emissions, protect air quality, and support the health and well-being of our communities and the environment. This Air Pollution Policy serves as the foundation for our on-going efforts to minimize our environmental impact and contribute to a cleaner, healthier planet.

15. MATERIALS, CHEMICALS AND WASTE POLICY

NAP/ESG/PY/15

1. Introduction

NAP is committed to ensuring that its operations minimize the environmental impact caused by materials, chemicals, and waste. The company is dedicated to implementing sustainable practices across its manufacturing processes, focusing on efficient use of resources, safe chemical handling, and reducing waste generation. This policy outlines the objectives, actions, and responsibilities for managing materials, chemicals, and waste throughout our operations, in line with best environmental practices and regulatory requirements.

2. Scope

The scope of this Materials, Chemicals, and Waste Management Policy applies to all operations at NAP, encompassing the sourcing, handling, use, storage, and disposal of raw materials, chemicals, and waste. This includes manufacturing processes for plastic injection-moulded components, the management of hazardous and non-hazardous materials, and waste minimization strategies across all production areas. The policy covers all employees, contractors, and third-party partners involved in the company's operations. It ensures compliance with local and international environmental regulations and promotes sustainability through efficient resource use, safe chemical practices, and responsible waste management throughout the company’s value chain.

3. Roles and Responsibilities

3.1. Board of Directors:

The Board of Directors will approve the Materials, Chemicals, and Waste Management Policy, ensuring it aligns with the company’s overall sustainability and ESG goals. They will allocate the necessary resources and support for the effective implementation of the policy across all departments. The Board will also oversee the integration of waste management strategies, ensuring that they comply with all relevant local and international regulations. Additionally, the Board will periodically review the company’s performance in waste reduction and materials management, ensuring continuous improvement and accountability toward environmental goals and sustainability commitments.

3.2. Environmental Sustainability Team:

The Environmental Sustainability Team will develop and implement waste management strategies and best practices for chemical handling, ensuring all materials, chemicals, and waste are managed in accordance with environmental regulations. They will monitor compliance with the policy across the organization and conduct regular audits of waste management practices, hazardous material usage, and resource consumption. The team will also maintain up-to-date records of all hazardous and non-hazardous materials, tracking waste streams, usage quantities, and disposal methods. By ensuring proper documentation and continuous monitoring, they will ensure the company's commitment to sustainable practices and regulatory compliance.

3.3. Operations and Production Managers:

Operations and Production Managers will oversee the implementation of waste reduction and resource efficiency measures within their respective areas, ensuring that all chemicals and materials are stored, handled, and disposed of safely and responsibly. They will ensure compliance with safety protocols, waste management strategies, and sustainability goals. Additionally, they will train employees on proper waste disposal techniques, chemical safety, and environmental best practices. By fostering a culture of safety and environmental responsibility, they will contribute to reducing the company's environmental impact while ensuring operational efficiency and compliance with regulatory standards.

3.4. Employees:

Employees will actively participate in training programs related to materials handling, chemical safety, and waste management to ensure they are well-informed about best practices. They will follow operational guidelines to minimize material waste, ensuring the proper disposal of chemicals and hazardous materials in compliance with safety protocols. Employees are expected to report any incidents or violations related to materials and chemicals promptly, contributing to a safer and more sustainable workplace. By adhering to these responsibilities, employees play a critical role in maintaining the company's commitment to responsible material management and environmental protection.

4. Materials, Chemicals and Waste policy

4.1. Policy Overview:

NAP is committed to responsible management of materials, chemicals, and waste to reduce environmental impacts. The company aims to minimize the use of hazardous materials, reduce waste generation, and ensure the safe disposal of chemicals and waste. We integrate sustainable practices into our operations and strive for continuous improvement in resource efficiency.

This policy aligns with our broader Environmental, Social, and Governance (ESG) goals and complies with applicable environmental laws and regulations. We aim to promote sustainable material sourcing, safe chemical handling, and efficient waste management to minimize the environmental footprint of our operations.

4.2. Waste Minimization:

NAP is dedicated to minimizing waste through efficient material usage, process optimization, and recycling initiatives. We will evaluate production processes to identify opportunities to reduce material waste at the source. All waste generated, including non-hazardous and hazardous waste, will be handled responsibly to prevent contamination of local ecosystems. Employees will be trained to follow best practices in waste segregation, storage, and disposal. Our goal is to reduce waste generation by implementing lean manufacturing practices, improving resource efficiency, and increasing recycling rates, thereby contributing to the reduction of environmental impact from waste.

4.3. Chemical Safety and Handling:

NAP commits to ensuring the safe handling, storage, and disposal of chemicals used in production processes. We will use only those chemicals that meet the required safety and environmental standards and minimize their environmental impact. Our operations will follow strict protocols for chemical handling to prevent leaks, spills, or accidental exposure. We will ensure that all chemicals are properly labelled and stored in accordance with safety guidelines. Employees will undergo regular training on chemical safety to minimize risks and ensure the safe use of hazardous materials in production activities.

4.4. Waste Disposal and Recycling:

NAP will establish comprehensive waste management practices for both hazardous and non-hazardous materials, ensuring compliance with relevant environmental regulations. We will prioritize waste segregation, recycling, and reusing materials whenever possible to reduce the amount of waste sent to landfills. The company will collaborate with certified waste disposal contractors to ensure the safe and compliant disposal of hazardous waste. We will continually monitor and improve our waste management processes to enhance recycling efforts and minimize the environmental impact of waste. Our target is to increase recycling rates across all operations by 15% annually.

4.5. Sustainable Materials Sourcing:

NAP is committed to sourcing raw materials responsibly, ensuring that the materials we purchase are obtained sustainably. We will prioritize the use of renewable, recyclable, and eco-friendly materials wherever feasible, minimizing the environmental impact of our operations. Our suppliers will be required to meet stringent sustainability standards, ensuring that they follow responsible sourcing practices.

The company will assess the environmental impacts of raw materials and work towards reducing the use of non-renewable or environmentally harmful substances in production. Our goal is to source at least 50% of materials from sustainable sources within the next three years.

4.6. Training and Awareness:

NAP will provide regular training to all employees to raise awareness of the importance of materials management, chemical safety, and waste reduction. This training will cover proper waste segregation techniques, safe handling and disposal of chemicals, and ways to minimize material waste in production processes. Employees will be equipped with the knowledge and tools to identify opportunities for waste reduction and resource optimization in their daily activities. We will also promote a culture of environmental responsibility, ensuring that every employee understands their role in minimizing the company's environmental footprint.

4.7. Regulatory Compliance:

NAP is committed to full compliance with all local, regional, and international environmental regulations related to the use of materials, chemicals, and waste management. We will regularly review and update our practices to ensure adherence to current laws and standards. The company will work closely with regulatory bodies to stay informed about new and evolving requirements. Compliance audits will be conducted regularly to ensure that all aspects of chemical handling, waste disposal, and materials sourcing meet the required legal and environmental standards, ensuring the company's operations remain sustainable and legally compliant.

4.8. Continuous Improvement:

NAP strives for continuous improvement in all areas of materials, chemicals, and waste management. The company will regularly evaluate the effectiveness of current practices and seek new opportunities to reduce environmental impacts. Key performance indicators (KPIs) will be established to track progress in waste reduction, material usage efficiency, and recycling efforts. Regular audits and performance reviews will help identify areas for improvement, and the company will adopt new technologies and best practices to enhance its sustainability performance. Continuous improvement initiatives will be communicated to employees, fostering a culture of innovation and environmental stewardship.

4.9. Collaboration with External Stakeholders:

NAP will actively collaborate with external stakeholders, including suppliers, waste management partners, and regulatory authorities, to promote best practices in materials, chemicals, and waste management. We will work with suppliers to improve the sustainability of the materials we purchase and encourage them to adopt environmentally responsible practices. Additionally, the company will engage with local communities and environmental organizations to support initiatives aimed at reducing waste, improving recycling rates, and minimizing environmental pollution. By working together with external stakeholders, NAP aims to amplify its environmental impact and foster sustainability throughout its supply chain.

4.10. Annual Review and Reporting:

NAP will conduct an annual review of its Materials, Chemicals, and Waste Management Policy to assess its effectiveness and identify areas for improvement. This review will include an evaluation of progress towards quantitative objectives, including waste reduction targets, recycling goals, and sustainable material sourcing initiatives. Feedback from employees, suppliers, and stakeholders will be considered in the review process to ensure the policy aligns with evolving environmental challenges and regulatory requirements. The results of the annual review will be shared with relevant stakeholders through reports, ensuring transparency and continued commitment to environmental sustainability.

5 Quantitative Objectives

Objective	Unit of Measure	Target Value	Qualitative Objective
Reduce total waste generation	Tonnes of waste	Reduce by 20% by 2026	Minimize waste generation through process optimization.
Increase recycling rate of waste	Percentage (%)	75% of total waste by 2026	Promote recycling efforts across all waste streams.
Reduce hazardous waste generation	Tonnes of hazardous waste	Reduce by 15% by 2026	Minimize the use of hazardous materials and improve handling and disposal.
Reduce material wastage in production	Percentage (%)	Reduce by 10% by 2026	Improve material efficiency and reduce waste in production.
Reduce chemical consumption	Kilograms of chemicals	Reduce by 10% by 2026	Implement substitution of chemicals and improved processes.

6. Distribution

The Materials, Chemicals, and Waste Management Policy will be distributed to all employees through email, company intranet, and training sessions. It will be included in the employee handbook and discussed during employee orientations to ensure thorough understanding. The policy will also be communicated to suppliers, contractors, and other external stakeholders, emphasizing the importance of responsible material use, chemical handling, and waste management. Ongoing communication will be maintained through regular newsletters, internal meetings, and updates to ensure continued alignment with the company's objectives. Feedback from stakeholders will be actively solicited to enhance the policy's implementation.

7. Annual Review

The Materials, Chemicals, and Waste Management Policy will undergo an annual review to assess its effectiveness and ensure continuous improvement. The review will focus on the following criteria: progress towards quantitative objectives, feedback from employees, suppliers, and stakeholders, changes in relevant environmental laws, and advancements in materials management and waste reduction technologies. Additionally, new practices and innovations in the management of hazardous and non-hazardous waste will be considered. The review process will be led by the Environmental Sustainability Team in collaboration with senior management, and the results will be communicated to all relevant stakeholders for further action.

8. Conclusion

NAP's Materials, Chemicals, and Waste Management Policy reflect our commitment to reducing environmental impacts from materials and waste while ensuring safe chemical handling and disposal. By working collaboratively across all levels of the organization, we aim to achieve sustainable, responsible practices that benefit the environment, employees, and surrounding communities.

16. ENVIRONMENTAL IMPACTS OF PRODUCT USE POLICY

NAP/ESG/PY/16

1. Introduction

NAP is committed to minimizing the environmental impact of our operations and products throughout their entire lifecycle, including their use by customers. As a manufacturer of plastic injection-moulded components and assemblies, we recognize the importance of reducing the environmental footprint of our products beyond production, addressing issues that arise during their use and disposal. This policy establishes guidelines for effectively managing the environmental impacts generated by the use of our products. We aim to integrate environmental considerations into product design, usage, and end-of-life stages, ensuring that our products contribute to a more sustainable future.

2. Scope

The scope of this policy applies to all plastic injection-moulded components and assemblies manufactured by NAP. It covers the entire lifecycle of the products, focusing on minimizing the environmental impact during their use phase by customers. This includes product design, energy efficiency, material usage, and end-of-life management. The policy extends to educating customers about sustainable practices, promoting recyclability, and reducing waste. It is applicable to all employees, departments, customers, suppliers, and stakeholders involved in the development, usage, and disposal of NAP products. The policy ensures continuous environmental improvements aligned with sustainability goals.

3. Roles and Responsibilities

3.1. Board of Directors:

The Board of Directors is responsible for approving and endorsing the Environmental Impacts from the Use of Products Policy. They will ensure that the company's product use practices align with NAP's environmental goals and broader ESG principles. The Board will allocate the necessary resources for the effective implementation of the policy, supporting on-going efforts to minimize the environmental impact of product use. They will also provide oversight to ensure the continuous improvement of practices, ensuring that the company meets its sustainability objectives while maintaining compliance with applicable regulations and standards.

3.2. Environmental Sustainability Team:

The Environmental Sustainability Team will lead initiatives to reduce the environmental impacts of product use. They will assess products across their entire lifecycle, identifying opportunities for improvement in terms of sustainability. The team will ensure compliance with all relevant environmental regulations and report on progress towards achieving the company's sustainability objectives. Additionally, they will collaborate with the product development team to integrate sustainability into product design, ensuring that environmental impacts are considered from the initial concept through to the end of the product's life. This includes exploring ways to reduce waste, emissions, and resource consumption.

3.3. Product Design and Development Team:

The product development team will focus on designing products that minimize environmental impacts during use. This includes ensuring that products are energy-efficient and manufactured using minimal hazardous materials, reducing both operational and environmental risks. The team will collaborate closely with the sustainability team to evaluate product designs against established environmental standards, ensuring compliance with regulatory requirements and aligning with the company's sustainability goals. This collaborative approach aims to develop products that not only meet customer needs but also contribute to reducing the overall environmental footprint throughout their lifecycle, from production to disposal.

3.4. Sales and Marketing Team:

The company will educate customers on the environmental benefits of using its products, emphasizing energy efficiency, sustainability, and reduced environmental impact. We will provide clear guidance on how to responsibly use and dispose of products to minimize waste and reduce the impact on ecosystems. Additionally, we will actively collect feedback from customers regarding product performance and environmental concerns. This feedback will be used to continually improve product designs and ensure that future products meet both customer needs and sustainability goals. By engaging customers in responsible consumption, we aim to promote environmental stewardship throughout the product's lifecycle.

3.5. Operations and Production Managers:

We will optimize manufacturing processes to minimize environmental impacts during the product's use phase. This includes focusing on energy efficiency, reducing waste, and using sustainable materials to ensure our products have a lower environmental footprint. Packaging materials will be selected carefully to ensure they are recyclable, biodegradable, or reusable, aligning with our commitment to sustainability. We will continually evaluate packaging design to reduce unnecessary waste and enhance its recyclability. By prioritizing environmentally friendly packaging and sustainable production methods, we aim to reduce the overall environmental impact of our products throughout their lifecycle.

3.6. Employees:

Employees will adhere to the guidelines outlined in this policy to minimize the environmental impacts associated with the use of our products. This includes adopting best practices in product handling, maintenance, and disposal to reduce waste and energy consumption. All employees will participate in training programs designed to increase awareness of the environmental impacts of products, focusing on sustainability and responsible use. Additionally, employees are encouraged to report any potential environmental concerns or issues related to product use, enabling prompt action and continuous improvement in line with our environmental objectives and sustainability goals.

4. Environmental impacts from use of products Policy

4.1. Product Design and Environmental Impact:

NAP is committed to designing products with minimal environmental impact during their use. The company will focus on using energy-efficient designs and materials that reduce waste and emissions. Sustainable sourcing and eco-friendly components will be prioritized. Regular evaluations of product lifecycle impacts will guide design decisions to ensure minimal environmental harm. This includes ensuring that products are recyclable, reducing hazardous substances, and improving product longevity to reduce the need for frequent replacements.

4.2. Energy Efficiency:

NAP will prioritize the design and manufacturing of energy-efficient products. All products will be designed to consume minimal energy during use, thereby reducing their environmental footprint. The company will incorporate the latest technologies and design innovations to improve energy efficiency. This includes incorporating energy-saving features such as low power consumption and optimized performance. Regular reviews will assess the performance of existing products in terms of energy use, and opportunities for further improvement will be explored.

4.3. Materials Selection:

The company will select materials that have minimal environmental impacts during product use. This includes opting for sustainable, renewable, or recyclable materials that reduce waste generation and lower emissions during the product's lifecycle. Non-toxic and low-impact materials will be prioritized to ensure that products are safe for the environment throughout their use. Materials selection will also include evaluating the product's end-of-life and recyclability potential. NAP aims to minimize resource depletion through the careful selection of materials that align with ESG principles.

4.4. Sustainable Manufacturing Processes:

The company will continuously evaluate and improve manufacturing processes to ensure they align with sustainability goals. All production activities will aim to minimize energy and resource consumption while maintaining high-quality standards. Sustainable practices such as lean manufacturing, waste reduction, and the use of renewable energy sources will be incorporated into daily operations. The company will also focus on reducing the environmental impact of production activities, such as waste generation, chemical use, and emissions, by optimizing production lines and adopting cleaner technologies.

4.5. Waste Reduction and Recycling:

NAP will strive to minimize waste generation from product use and ensure that all waste is properly managed. This includes implementing systems for recycling and reusing materials where possible, both in the production process and in product packaging. The company will work to reduce product packaging waste by promoting recyclable or biodegradable options. Consumer guidelines will be provided for responsible disposal and recycling of products at the end of their use. Additionally, efforts will be made to ensure that any waste generated during the product use phase has minimal environmental impact.

4.6. Product Lifecycle Management:

The company will implement product lifecycle management strategies to assess and reduce the environmental impact of products from design through disposal. This approach includes assessing the long-term environmental impacts of a product, tracking product usage, and collecting data on its performance during its lifecycle. Regular audits will be conducted to evaluate how products contribute to environmental sustainability during their use and make necessary adjustments to product designs and usage guidelines to enhance sustainability.

4.7. Customer Education and Awareness:

NAP will provide comprehensive customer education and awareness programs to ensure that customers understand how to use and dispose of products responsibly. This includes providing clear instructions on energy-efficient usage, recycling, and proper disposal methods. The company will also highlight the environmental benefits of using the products in marketing materials and customer communications. By empowering customers with knowledge, NAP aims to reduce environmental impacts associated with product usage in real-world scenarios.

4.8. Environmental Impact Monitoring and Reporting:

To measure progress, the company will establish mechanisms for monitoring the environmental impact of product use. Data on product energy consumption, waste generation, and recyclability will be collected and reported on a regular basis. The company will also track the effectiveness of product design improvements and customer feedback. Regular environmental impact assessments will be shared with stakeholders, providing transparency on the company's progress in minimizing environmental harm. This data will also guide future product innovations and improvements.

4.9. Regulatory Compliance:

NAP is committed to adhering to all relevant environmental regulations regarding product use. The company will ensure that all products comply with national and international standards for sustainability, energy efficiency, and waste management. The product design and usage guidelines will be aligned with environmental laws and regulations to avoid any legal or regulatory violations. The company will regularly review changes in regulations to ensure that products meet evolving environmental requirements and update policies and practices as needed.

4.10. Continuous Improvement:

NAP will embrace a continuous improvement approach to reduce the environmental impacts from product use. Regular reviews of products, customer feedback, and environmental data will be conducted to identify opportunities for enhancement. The company will invest in research and development to innovate new ways to reduce environmental harm and improve product performance. This on-going commitment to improvement will ensure that products remain at the forefront of sustainability and meet customer expectations for minimal environmental impact.

5. Quantitative Objectives

Qualitative Objective	Unit of Measure	Target Value
Improve the energy efficiency of products during their operational phase.	kWh per unit of product.	Achieve a 10% reduction in energy consumption per unit within 3 years.
Design products for greater recyclability and ease of disassembly.	Percentage of recyclable components.	Achieve a 90% recyclability rate for all products by 2026.
Minimize packaging waste and encourage recyclable packaging materials.	Weight of packaging waste per product unit.	Reduce packaging waste by 25% over the next 5 years.
Increase product take-back and recycling initiatives.	Percentage of products recycled at end-of-life.	Increase product recycling rate to 50% by 2028.
Reduce harmful chemicals and non-recyclable materials in products.	Number of harmful substances eliminated.	Eliminate 100% of harmful substances from products by 2030.

6. Distribution

The policy will be distributed to all relevant stakeholders to ensure widespread understanding and compliance. Employees involved in product development, sales, and customer service will receive training on the policy and its implications. Suppliers will be informed about our commitment to sustainable product design and sourcing of responsible materials. Customers will be provided with clear guidelines on product usage, disposal, and recycling to ensure responsible consumption. Regulatory authorities will be kept informed, ensuring our adherence to applicable regulations, and we will provide required reports and updates to maintain transparency and compliance with environmental standards.

7. Annual Review

NAP will conduct an annual review of this policy to evaluate its effectiveness and identify areas for improvement. The review will include an analysis of progress towards set objectives, such as energy efficiency and recyclability targets. Employee and customer feedback will be gathered to assess the policy's implementation and identify potential areas for enhancement. Additionally, regulatory compliance will be reviewed to ensure adherence to any changes in laws and standards related to product use. The findings will be communicated to key stakeholders, ensuring transparency and accountability in meeting our environmental goals.

8. Conclusion

NAP is committed to minimizing the environmental impact of its products during their use and end-of-life stages. Through responsible design, sustainable use, and effective recycling strategies, we aim to contribute to a cleaner and more sustainable environment. By implementing this policy, we will not only reduce our environmental footprint but also enhance our corporate reputation as a leader in sustainability. Our continuous focus on improvement and collaboration with stakeholders will help us meet our environmental goals and ensure a more sustainable future.

17. ENVIRONMENTAL IMPACTS OF PRODUCT DISPOSAL POLICY

NAP/ESG/PY/17

1. Introduction

NAP is committed to minimizing the environmental impacts of its products throughout their lifecycle, particularly at the end-of-life (EOL) stage. As a manufacturer of plastic injection-moulded components and assemblies, we recognize the need for responsible disposal, recycling, and waste management to reduce our environmental footprint. This policy outlines our approach to reducing hazardous and non-hazardous waste, preventing micro plastics pollution, and ensuring our products are recyclable or repurposable. We are dedicated to aligning with sustainability goals, meeting regulatory standards, and engaging our stakeholders to actively manage the environmental impacts of our products at the end of their life.

2. Scope

This policy applies to all products manufactured by NAP and encompasses the full range of activities related to the end-of-life management of these products. The scope includes product take-back, recycling, repurposing, disposal practices, reduction of hazardous materials, and addressing micro plastics pollution. This policy also covers our responsibilities towards stakeholders, including customers, suppliers, regulators, and internal teams, and ensures our compliance with national and international environmental standards.

3. Roles and Responsibilities

3.1 Board of Directors:

The Board of Directors will approve and endorse the policy, ensuring it aligns with NAPt's broader environmental and ESG objectives. They will allocate the necessary resources to implement the policy effectively and support continuous improvement in product end-of-life management. Additionally, the Board will oversee the company’s commitment to sustainability, ensuring that all initiatives are executed as planned. They will regularly review progress towards set objectives and provide transparent updates to key stakeholders, including employees, suppliers, customers, and regulatory authorities, reinforcing the company's dedication to reducing environmental impacts from the end-of-life phase of its products.

3.2 Executive Management:

The Environmental Sustainability Team will lead the development and implementation of the End-of-Life (EOL) policy, ensuring it aligns with the company's environmental objectives. They will monitor the effectiveness of EOL strategies, driving continuous improvement through regular assessments and updates. The team will ensure that all employees are trained on best practices for managing product end-of-life and the company's broader sustainability goals. Additionally, they will collaborate closely with product design teams to integrate recyclability, reuse, and sustainability principles into product design, ensuring that products are designed with their end-of-life impact in mind, minimizing waste and maximizing resource recovery.

3.3 Product Design and Development Team:

The Product Design Team will collaborate closely with the sustainability team to ensure product designs enable easy disassembly, recycling, and the reduction of hazardous components. They will prioritize the selection of materials that are recyclable, biodegradable, or otherwise environmentally friendly at the product's end-of-life stage. Additionally, the team will focus on minimizing the release of microplastics and hazardous waste by using safer, eco-friendly materials and processes. This approach will not only enhance the sustainability of the products but also reduce environmental impacts throughout their lifecycle, ensuring that the company meets its commitment to sustainable end-of-life management and waste reduction goals.

3.4 Sustainability and Environmental Team:

The Sustainability and Environmental Impact Team will monitor and evaluate the environmental impacts of products at the end of their life cycle. They will develop and implement strategies for waste reduction, recycling, and safe disposal of both non-hazardous and hazardous waste. Additionally, the team will focus on educating customers and suppliers about sustainable product disposal practices and provide guidance on proper recycling methods. The team will also track the company's performance in managing end-of-life impacts, ensuring compliance with environmental regulations, and reporting progress toward sustainability goals, contributing to NAP's commitment to effective end-of-life environmental management.

3.5 Customers and Consumers:

Employees will actively participate in product take-back and recycling programs when available, ensuring responsible disposal and minimizing environmental impact. They will follow the provided guidelines for proper disposal of products at the end of their life, ensuring compliance with the company's sustainability objectives. Additionally, employees are encouraged to engage with NAP's sustainability programs by providing feedback on the effectiveness of product end-of-life management.

This engagement helps identify areas for improvement and ensures that the company continuously enhances its efforts to reduce environmental impacts, align with best practices, and meet its recycling and waste management targets.

4. Environmental Impacts from Products End-of-Life Policy

4.1 Sustainable Product Design:

NAP commits to designing products with consideration for their end-of-life impacts, prioritizing materials that are recyclable, reusable, and biodegradable. Products will be designed for easy disassembly to promote recycling and minimize waste. A focus on reducing the use of hazardous materials and microplastics will be integral to the design process. This proactive approach will ensure that our products contribute to a circular economy, reducing environmental impacts and supporting the efficient reuse of resources in the product life cycle.

4.2 Hazardous Waste Management:

The company is dedicated to minimizing the generation of hazardous waste at the end of its products' life cycle. Proper disposal methods for hazardous materials will be incorporated into product design, and clear guidelines will be provided for the responsible disposal of such products. In cases where hazardous components are unavoidable, NAP will work with specialized waste management services to ensure that the hazardous waste is handled safely and in compliance with environmental regulations. Continuous monitoring will be undertaken to ensure adherence to safety standards and regulations.

4.3 Non-Hazardous Waste Management:

NAP will implement strategies to reduce non-hazardous waste generated by its products at the end of their life. This includes promoting recycling programs and collaborating with customers to ensure proper disposal and recycling of non-hazardous waste. The company will invest in systems to track and improve recycling rates, encouraging the reuse of materials where possible. Efforts to minimize landfill disposal and optimize waste-to-energy conversion will be prioritized, with a focus on reducing the volume of non-hazardous waste that enters landfills.

4.4 Micro plastic Reduction:

As part of our commitment to reducing environmental impact, NAP will minimize the use of microplastics in product design. We will actively research and implement alternatives to microplastics in our plastic injection-molded components. Additionally, strategies to prevent the release of microplastics during the product's use phase and at the end of its life will be a priority.

The company will collaborate with industry bodies and research organizations to develop best practices and technologies for micro plastic reduction, ensuring that our products contribute minimally to micro plastic pollution in the environment.

4.5 Recycling and Circular Economy Initiatives:

NAP is committed to ensuring that its products, at the end of their useful life, are recyclable, and where possible, will be repurposed for new products or components. The company will work closely with recycling facilities to ensure proper processing and will provide customers with clear instructions on how to recycle our products. We will encourage participation in product take-back programs to promote a circular economy, reducing the demand for virgin materials. The ultimate goal is to maintain valuable resources within the economy for as long as possible.

4.6 Product Take-Back Programs:

NAP will implement product take-back programs to recover products at the end of their life cycle. These programs will focus on efficiently collecting, sorting, and recycling products, ensuring that materials are repurposed rather than disposed of in landfills. Customers will be encouraged to return products for recycling through clear communication channels. The company will also explore partnerships with third-party recycling and waste management firms to extend the program's reach and effectiveness. These programs will align with our environmental responsibility goals and contribute to sustainability efforts.

4.7 Consumer Awareness and Education:

NAP will provide comprehensive guidelines and educational resources to customers regarding the proper disposal and recycling of products. This includes clear instructions on disassembly and separating materials that are recyclable. The company will also promote awareness campaigns aimed at informing customers about the environmental impacts of improper disposal and the importance of participating in recycling programs. Empowering customers with knowledge will encourage responsible product end-of-life management and contribute to the reduction of waste and environmental harm.

4.8 Collaboration with Suppliers:

The company will collaborate with suppliers to ensure that the materials and components used in its products are environmentally responsible at the end of their life. Suppliers will be required to adhere to NAP's sustainability standards, including using recyclable or biodegradable materials, reducing hazardous substances, and promoting sustainable disposal practices.

4.9 Regulatory Compliance and Reporting:

NAP is committed to adhering to all applicable environmental regulations concerning the end-of-life management of products. This includes compliance with laws related to product recycling, waste disposal, and hazardous material handling. The company will also engage in continuous monitoring to ensure regulatory compliance. Reports on the company's performance regarding end-of-life management will be submitted to relevant authorities as required. NAP will stay up-to-date with any changes to laws and regulations and adjust policies and practices accordingly to maintain compliance and minimize environmental risks.

4.10 Continuous Improvement and Annual Review:

NAP will conduct an annual review of its product end-of-life management policy to assess effectiveness and identify areas for improvement. The review will evaluate progress toward recycling and waste reduction targets and identify opportunities to enhance sustainability initiatives. Employee and customer feedback will be considered during this review to ensure the policy reflects current best practices and industry standards. The company will remain committed to continuous improvement, ensuring that its end-of-life strategies evolve with technological advancements, regulatory changes, and emerging environmental challenges.

5. Quantitative Objectives

Qualitative Objective	Unit of Measure	Target Value
Promote product recycling to reduce waste sent to landfills.	Percentage of products recycled post-consumer use.	70% of products to be recycled by 2027.
Reduce the generation of hazardous waste during product end-of-life.	Metric tons of hazardous waste produced.	Reduce hazardous waste by 30% over the next five years.
Prevent microplastics pollution from the disposal of NAP products.	Amount of microplastics generated per unit of product sold.	Achieve a 50% reduction in microplastics by 2028.
Increase consumer involvement in take-back and recycling programs.	Percentage of customers participating in recycling programs.	Achieve 60% customer participation in take-back schemes by 2026.
Ensure no products end up in landfills after their end-of-life phase.	Percentage of waste diverted from landfills.	Divert 100% of waste from landfills by 2030.

6. Distribution

The Environmental Impacts from Products End-of-Life Policy will be distributed to key stakeholders as follows: All employees will undergo training on the policy and its implementation to ensure alignment with the company's sustainability objectives. Suppliers will be informed about NAP's commitment to sustainable end-of-life management and encouraged to adopt similar practices. Customers will receive clear guidelines on the responsible disposal, recycling of products, and will be encouraged to participate in product take-back programs. Additionally, NAP will comply with relevant regulations and submit required reports to regulatory authorities on product end-of-life management.

7. Annual Review

The annual review will include evaluating progress toward recycling and waste reduction targets, ensuring that established goals are being met. Employee and customer feedback will be gathered to identify areas for improvement and ensure the policy is effectively implemented. A review of regulatory compliance will ensure alignment with updated environmental laws and regulations, while assessing performance metrics to determine whether quantitative objectives, such as recycling rates and waste reduction, have been achieved. The policy will also be updated, if necessary, to reflect new research, technological advancements, or regulatory changes in waste management, recycling, and micro plastics prevention.

8. Conclusion

NAP is committed to reducing the environmental impacts of products at the end of their life cycle through sustainable design, responsible disposal, and recycling practices. By integrating these practices into our operations, we aim to minimize hazardous waste, reduce micro plastic pollution, and ensure compliance with environmental regulations. Our employees, suppliers, and customers will work collaboratively to support these efforts, contributing to the circular economy. Regular reviews, feedback mechanisms, and continuous improvements will help us achieve our sustainability goals, ensuring that NAP remains a responsible and environmentally conscious manufacturer in the industry.

18. CUSTOMER HEALTH AND SAFETY POLICY

NAP/ESG/PY/18

1. Introduction

NAP is committed to upholding the highest standards of customer health and safety, ensuring that our products meet all regulatory requirements and minimize potential risks to end-users. Our company recognizes the importance of a sustainable approach, aiming to mitigate environmental impacts through comprehensive end-of-life product management. We understand that our responsibility extends beyond production to encompass the entire lifecycle of our products, which includes considerations for waste management, emissions, and potential micro plastic pollution.

2. Scope

This policy applies to all products manufactured by NAP including plastic injection moulded components and assemblies, as well as any related services. It encompasses our commitment to customer health and safety throughout the entire product lifecycle, from design to disposal. We pledge to reduce environmental impacts from the end-of-life phase of our products by focusing on responsible waste management, emissions control, and pollution prevention. Furthermore, we ensure strict compliance with all regulatory standards and dedicate ourselves to the continuous improvement of our health, safety, and environmental (HSE) performance in alignment with industry best practices.

3. Roles and Responsibilities

3.1 Senior Management:

Senior Management plays a crucial role in endorsing and supporting the organization's health and safety policy. Their responsibilities include ensuring that adequate resources are allocated for the effective implementation of health and safety standards. They are tasked with fostering a culture of safety and sustainability across the organization, encouraging all employees to prioritize health and safety practices in their daily operations. By leading by example and engaging with employees at all levels, Senior Management reinforces the importance of adhering to safety regulations and continuously improving health and safety performance throughout the organization.

3.2 Health and Safety Officer:

The Health and Safety Officer is integral to identifying, assessing, and mitigating risks that may impact customer health and safety. This role involves conducting thorough risk assessments and implementing effective safety measures in collaboration with various departments. The officer is responsible for ensuring compliance with relevant health and safety regulations, and they regularly review policies and procedures to enhance safety practices. By fostering communication among departments, the Health and Safety Officer ensures that safety protocols are well understood and followed. Additionally, they play a key role in training employees on health and safety standards and best practices.

3.3 Environmental Compliance Team:

The Environmental Compliance Team is dedicated to minimizing the environmental impacts associated with the products' end-of-life stages. Their efforts focus on critical aspects such as waste management, emissions reduction, and the mitigation of micro plastic pollution. This team conducts thorough assessments to identify potential environmental risks and develops strategies to manage waste responsibly, ensuring compliance with environmental regulations. They collaborate with various departments to implement sustainable practices and promote environmentally friendly initiatives throughout the product lifecycle. By raising awareness and educating employees on environmental issues, the team aims to foster a culture of sustainability within the organization.

3.4 Quality Assurance Team:

The Quality Assurance Team is responsible for ensuring that all products meet the highest health and safety standards before they reach the market. This team conducts regular testing and inspections to verify product safety and compliance with relevant regulations. They review customer feedback and investigate any incidents related to product safety, allowing them to identify areas for improvement. By implementing rigorous quality control measures, the team aims to enhance product reliability and customer satisfaction. Their proactive approach ensures that potential safety issues are addressed promptly, safeguarding customers and maintaining the organization’s reputation for quality and safety.

3.5 Product Design and Development Team:

The Product Design and Development Team is committed to integrating health, safety, and environmental considerations into the product design process. They focus on mitigating risks associated with end-of-life management by reducing the use of hazardous materials and addressing potential micro plastic pollution. This team collaborates with various stakeholders to ensure that sustainability principles are incorporated into product design from the outset. By employing innovative design practices, they strive to create environmentally friendly products that minimize environmental impact throughout their lifecycle. Their work plays a vital role in advancing the organization's sustainability goals and enhancing the safety profile of new products.

4. Customer Health and Safety Policy

4.1Commitment to Customer Health and Safety:

NAP is dedicated to safeguarding customer health and safety by adhering to high safety At NAP, our commitment to customer health and safety is paramount. We adhere to high safety standards throughout product development and manufacturing, proactively addressing risks related to chemical exposure, product malfunction, and environmental hazards. Our approach includes implementing safety-first principles at every production stage and meeting or exceeding regulatory standards for health and safety. We value customer feedback and incorporate it into our continuous improvement processes. Additionally, we collaborate with our suppliers to ensure that all materials used align with our stringent safety standards, reinforcing our dedication to providing safe and reliable products for our customers.

4.2 Environmental Impact from Product End-of-Life:

At NAP, we are committed to minimizing the environmental impacts associated with our products' end-of-life. We focus on waste minimization by designing products for recycling and implementing sustainable sourcing practices to reduce waste generation. Our emission control efforts ensure compliance with all regulatory standards, aiming to minimize volatile organic compounds (VOCs), particulate matter, and other emissions during production and disposal. Additionally, we actively work to prevent micro plastic pollution by assessing product material selection and exploring alternatives that reduce the potential for environmental contamination. Through these initiatives, we strive to protect the environment and promote sustainability in our operations.

4.3 Customer Feedback and Incident Response:

At NAP, we prioritize customer feedback and maintain a transparent system to record and address health and safety issues. Our Quality Assurance Team diligently reviews customer concerns and assesses any product safety incidents, ensuring that we respond promptly and effectively. This proactive approach allows us to identify potential safety issues and implement necessary updates to our safety protocols. By fostering open communication with our customers, we not only enhance product safety but also strengthen trust in our commitment to delivering high-quality, reliable products. Continuous improvement is at the heart of our incident response strategy, ensuring we meet customer expectations.

4.4 Continuous Improvement:

At NAP, we are dedicated to continuous improvement in customer health, safety, and environmental performance. We actively engage in research and development to stay ahead of emerging safety standards and environmental requirements. Our commitment includes conducting regular policy reviews to ensure our practices align with the latest regulations and best practices in the industry. By fostering a culture of innovation and accountability, we aim to enhance our products and processes continually. This proactive approach not only protects our customers and the environment but also demonstrates our unwavering dedication to achieving excellence in all aspects of our operations.

4.5 End-of-Life Environmental Management:

At NAP, we are committed to minimizing the environmental impacts of our products at the end-of-life stage. Our policy sets clear objectives to reduce waste, emissions, and the release of microplastics. We implement eco-design principles to ensure that our products are designed for easy recycling, reuse, or safe disposal, thus reducing both hazardous and non-hazardous waste. This approach not only helps reduce our ecological footprint but also supports a circular economy by promoting sustainable product life cycles. By adopting these measures, we contribute to a cleaner, more sustainable environment for future generations.

4.6 Risk Assessment and Product Safety Testing:

NAP conducts regular risk assessments and safety tests on our plastic components to identify and mitigate potential risks to customers. These assessments include durability testing to ensure long-term performance, toxicity assessments to evaluate material safety, and material safety checks to confirm compliance with industry standards.

Our goal is to ensure that all products meet or exceed established safety standards, reducing any risk of harm to consumers or the environment. Through thorough testing and continuous improvement, we prioritize customer safety and product reliability, fostering trust in the quality of our products.

4.7 Material and Process Selection:

At NAP, we prioritize the careful selection of materials and manufacturing processes to minimize environmental impact and avoid hazardous substances. We actively seek to reduce the use of harmful chemicals in our production processes and choose materials that are either recyclable or biodegradable whenever possible. By focusing on sustainable materials and eco-friendly processes, we aim to lower our environmental footprint while ensuring the safety and quality of our products. This approach not only supports regulatory compliance but also aligns with our commitment to sustainability and responsible manufacturing practices.

4.8 Material and Process Selection:

At NAP, we are committed to selecting materials and manufacturing processes that minimize environmental impact and avoid hazardous substances. We focus on reducing the use of harmful chemicals in our products and processes, prioritizing safer alternatives. Whenever possible, we opt for recyclable or biodegradable materials, ensuring that our products can be more easily reprocessed or safely disposed of at the end of their life cycle. This approach not only aligns with our sustainability goals but also supports regulatory compliance, reduces waste, and contributes to a circular economy by promoting eco-friendly manufacturing practices.

4.9 Customer Education and Safety Guidelines:

At NAP, we recognize the importance of customer education in ensuring the safe use of our products. We provide clear, accessible, and comprehensive safety instructions and guidelines with every product, detailing proper handling, usage, and disposal practices to prevent potential health hazards. These guidelines are designed to promote safe and responsible use while minimizing environmental impact. Additionally, we have a dedicated customer support team available to address any questions or concerns regarding product safety, environmental impact, or best practices. Our commitment to education empowers customers to make informed, safe choices for themselves and the environment.

4.10 Sustainable Packaging:

NAP is dedicated to minimizing the environmental impact of packaging for our plastic components. We prioritize the use of sustainable, recyclable, or biodegradable packaging materials to reduce plastic waste and lower the carbon footprint associated with packaging production and disposal. All packaging materials are regularly assessed for their environmental impact, ensuring continuous improvement. We aim to adopt alternatives that support circular economy principles, ensuring that our packaging can be reused, recycled, or safely biodegraded. This approach reflects our commitment to sustainability, helping reduce waste and conserve resources throughout the product lifecycle.

5. Quantitative Objectives

To ensure that our commitments are effectively met, we have set specific, measurable objectives:

Objective	Qualitative Objective	Unit of Measure	Target Value
Reduce Product-Related Health Incidents	Minimize customer incidents due to product safety failures	Number of incidents	<2 incidents annually
Increase Recyclability of Products	Design products for ease of recycling	% of recyclable parts	80% of all components
Control Emissions from Products	Reduce VOC and particulate emissions during product lifecycle	Emission level (g/unit)	5% reduction annually
Minimize Hazardous Waste Generation	Reduce hazardous waste from end-of-life product disposal	kg of hazardous waste	<50 kg annually
Prevent Micro plastic Pollution	Reduce release of micro plastics from products	kg of micro plastics	<10 kg annually

6. Distribution

The Customer Health and Safety Policy will be distributed comprehensively across all departments and shared with relevant stakeholders to ensure widespread awareness and compliance. This includes Senior Management and Board Members, along with our Health and Safety, Quality Assurance, Environmental Compliance, and Product Development teams. We will also engage suppliers and contractors to ensure they align with our health and safety requirements. Additionally, we are committed to transparency by sharing this policy with our customers and clients through our website and product packaging. This inclusive distribution approach underscores our dedication to fostering a culture of health and safety throughout our organization.

7. Annual Review

The Customer Health and Safety Policy will undergo an annual review to ensure its on-going relevance and alignment with evolving health, safety, and environmental standards. This comprehensive review process will involve assessing our performance against established objectives and updating targets as necessary to reflect current best practices. We will incorporate feedback from stakeholders, including employees, customers, and partners, to enhance the policy's effectiveness and address any emerging concerns. By conducting this regular evaluation, we demonstrate our commitment to continuous improvement and adaptability in our health and safety efforts, ensuring that we meet the highest standards in our operations.

8. Conclusion

In conclusion, NAP is deeply committed to safeguarding the health and safety of our customers through proactive product management and continuous enhancement of our environmental practices. We prioritize effective end-of-life management to minimize environmental impact while ensuring that our products are safe and reliable. Our goal is to set industry benchmarks for customer safety and environmental stewardship, demonstrating that we can protect our customers' well-being and contribute positively to the environment. By upholding these principles, we strive to build trust with our stakeholders and lead by example in our commitment to sustainability and safety in every aspect of our operations

19. ENVIRONMENTAL SERVICES AND ADVOCACY POLICY

NAP/ESG/PY/19

1. Introduction

At NAP, we recognize our responsibility towards the environment and are committed to integrating Environmental, Social, and Governance (ESG) principles into our business practices. As a manufacturer of plastic injection molded components and assemblies, we understand the significant impact our operations can have on the environment. This Environmental Services and Advocacy Policy outline our commitment to providing environmental services and advocacy to our customers, ensuring that we contribute positively to sustainable development and environmental stewardship.

2. Scope

This policy applies to all employees, departments, and stakeholders of NAP involved in the manufacturing and distribution of plastic injection molded components. It encompasses our commitment to integrating Environmental, Social, and Governance (ESG) principles into our business practices, ensuring environmental stewardship, and promoting sustainability.

3. Roles and Responsibilities

3.1 Senior Management:

Senior management at NAP plays a crucial role in steering our environmental services and advocacy initiatives. They are responsible for establishing the strategic direction of these initiatives, ensuring alignment with the company's overall goals. This includes allocating the necessary resources—both financial and human—to effectively implement and sustain the policy. Additionally, senior management must ensure that all operations comply with relevant environmental regulations and standards, fostering a culture of accountability and continuous improvement in environmental performance throughout the organization. Their leadership is vital to advancing our commitment to sustainability and responsible practices.

3.2 Environmental Services Team:

The Environmental Services Team at NAP is responsible for developing and implementing programs that significantly reduce environmental impacts associated with our operations. This includes conducting regular assessments to evaluate environmental performance and compliance with applicable regulations. The team works collaboratively with other departments to seamlessly integrate sustainability principles into product design and manufacturing processes, ensuring that environmental considerations are prioritized throughout the lifecycle of our products. By fostering cross-departmental cooperation, the Environmental Services Team enhances the effectiveness of our sustainability initiatives and promotes a culture of environmental responsibility within the organization.

3.3 Employees:

Employees at NAP play a vital role in supporting our environmental services and sustainability efforts. They are expected to actively participate in training programs designed to enhance their understanding of environmental practices and sustainability initiatives. By identifying opportunities for improvement within their work areas, employees contribute to reducing environmental impacts and promoting best practices. Additionally, they are encouraged to report any environmental concerns or incidents to the Environmental Services Team promptly. This proactive approach fosters a culture of accountability and collaboration, empowering employees to take an active part in the company's commitment to sustainability and environmental stewardship.

3.4 Customers and Stakeholders:

Customers and stakeholders are essential partners in NAP's commitment to environmental sustainability. They are encouraged to engage actively with our team to gain insights into their environmental impacts and explore ways to mitigate them through our services. Providing feedback on our environmental service offerings and advocacy initiatives helps us refine and enhance our solutions to better meet their needs. Furthermore, customers and stakeholders are invited to participate in educational workshops and training sessions focused on sustainability practices. This collaborative approach fosters a shared commitment to environmental stewardship and drives continuous improvement across our operations and offerings.

4. Environmental Services and Advocacy Policy

4.1 Environmental Services Offered:

NAP offers a range of environmental services designed to assist customers in understanding and mitigating their environmental impacts. Our services include Environmental Impact Assessments to identify potential impacts from product usage, and Sustainability Consulting that provides expert guidance on resource efficiency, waste reduction, and eco-friendly materials. We also conduct Training and Workshops to raise awareness of environmental issues and compliance requirements. Additionally, we collaborate with customers on Product Design, developing innovative and sustainable solutions that minimize environmental footprints. These services reflect our commitment to promoting sustainability and environmental responsibility across our customer bas

4.2 Alternative Solutions:

In addition to our environmental services, NAP actively advocates for alternative solutions that enhance sustainability. We offer products made from recyclable and biodegradable materials, significantly reducing waste and minimizing environmental impact. Our commitment to Energy-Efficient Manufacturing Processes involves implementing advanced technologies that lower resource consumption and decrease greenhouse gas emissions. Furthermore, we promote the adoption of Closed-Loop Systems in manufacturing, encouraging the recycling and reuse of materials to create a more sustainable production cycle. These initiatives reflect our dedication to fostering sustainable practices that benefit both our customers and the environment.

4.3 Environmental Awareness and Advocacy:

NAP is dedicated to cultivating a culture of environmental awareness both within our organization and among stakeholders. We advocate for policies and regulations that promote sustainable practices and protect the environment. By partnering with environmental organizations and industry groups, we share best practices and enhance knowledge in sustainability. Additionally, we actively engage in community outreach programs aimed at educating the public about sustainability and environmental stewardship. These efforts reflect our commitment to fostering a proactive approach to environmental issues, ensuring that both our employees and the broader community are informed and empowered to make sustainable choices.

4.4 Waste Management and Reduction:

NAP is committed to minimizing waste generation across our operations through comprehensive waste management strategies. We focus on reducing, reusing, and recycling materials within our facilities, employing efficient waste segregation methods to divert waste from landfills. By continuously improving internal processes, we contribute to the circular economy and reduce our environmental footprint. We also collaborate with clients to develop tailored waste reduction plans, helping to minimize the environmental impact throughout the product lifecycle. These initiatives reflect our ongoing commitment to responsible waste management, sustainability, and creating long-term value for both the company and the environment.

4.5 Carbon Footprint Reduction:

NAP is committed to minimizing its carbon footprint by adopting energy-saving technologies and sustainable transportation methods. We actively monitor and measure greenhouse gas emissions across our operations and products to identify opportunities for reduction. By utilizing renewable energy, energy-efficient equipment, and optimizing logistics, we aim to reduce our overall environmental impact. Additionally, we collaborate with clients to help them understand and manage their own carbon footprints, providing tailored solutions that support their carbon neutrality goals. These efforts reflect our commitment to sustainable practices and contribute to a cleaner, more sustainable future for all stakeholders.

4.6 Sustainable Sourcing and Procurement:

At NAP, our commitment to sustainability extends to sourcing and procurement. We partner with suppliers who share our dedication to eco-friendly practices and adhere to strict environmental standards. We prioritize the use of eco-friendly materials and responsibly sourced raw goods, ensuring that our supply chain supports our sustainability goals. By collaborating with like-minded vendors, we maintain high environmental and ethical standards throughout the production process. This approach ensures that the products and services we deliver align with our environmental objectives, contributing to a more sustainable and responsible business model.

4.7 Eco-Certifications and Standards Compliance:

NAP is committed to ensuring that all products and services comply with internationally recognized environmental standards and certifications. We adhere to guidelines such as ISO 14001 for Environmental Management Systems, as well as other certifications that promote sustainability and responsible practices. By continuously monitoring and improving our compliance with environmental regulations, we reinforce our commitment to corporate responsibility and environmental stewardship.

This ensures that our customers receive products that not only meet the highest quality standards but also align with global sustainability goals, contributing to a cleaner, more sustainable future.

4.8 Green Product Innovation:

At NAP, sustainability drives our commitment to green product innovation. We invest in research and development to create environmentally friendly products that are durable, reusable, and recyclable, minimizing their environmental impact throughout their entire lifecycle. By integrating green design principles into our product development, we ensure that our products not only meet high performance and quality standards but also contribute to reducing environmental footprints. This approach empowers our customers to make environmentally responsible choices without compromising on product effectiveness, helping us lead the way toward a more sustainable future.

4.9 Employee Engagement in Sustainability:

At NAP, we recognize that employee engagement is crucial to the success of our environmental initiatives. We provide ongoing training to educate employees on sustainability practices and encourage their active participation in sustainability programs. Employees play a key role in our environmental efforts, from adopting sustainable practices in their daily tasks to contributing innovative ideas for process improvements. By fostering a culture of sustainability within our workforce, we empower employees to take ownership of environmental goals, creating a collective effort to minimize our environmental impact and drive positive change across the organization.

4.10 Environmental Reporting and Transparency:

NAP prioritizes transparency in our environmental practices by providing annual environmental impact reports. These reports detail our sustainability goals, achievements, challenges, and future plans, offering stakeholders a clear understanding of our efforts to improve our environmental footprint. By sharing this information, we demonstrate our commitment to sustainability and ensure continuous progress. We also actively encourage customer feedback to further refine our environmental strategies and initiatives, fostering collaboration and ensuring that we remain aligned with best practices and evolving sustainability standards. This open approach helps build trust and accountability with our stakeholders.

5. QuantitativeObjectives

To measure the effectiveness of our environmental services and advocacy efforts, we have established the following quantitative and qualitative objectives:

Objective	Unit of Measure	Target Value
1. Reduce greenhouse gas emissions from operations by 20% within 3 years.	Metric Tons	20% reduction by 2027
2. Increase the use of recycled materials in production by 15% over the next 5 years.	Percentage of total material used	15% increase by 2029
3. Achieve a customer satisfaction rating of 90% or higher on environmental service offerings by conducting annual surveys.	Percentage of employees trained	90% satisfaction by 2025
4. Conduct 4 educational workshops annually for customers on sustainable practices and environmental impacts.	Number of consultations	4 workshops per year
5. Reduce waste generation from production by 25% over the next 4 years.	Percentage	25% reduction by 2028

6. Distribution

This Environmental Services and Advocacy Policy will be distributed to all employees, stakeholders, and relevant partners to ensure understanding and compliance. A comprehensive communication plan will be implemented to inform all staff about the policy, including training sessions and informational materials. The policy will be made readily accessible on our company intranet and website, ensuring that all employees can easily refer to it. Additionally, we will engage in regular updates and discussions during team meetings to reinforce our commitment to environmental services and advocacy, fostering a culture of sustainability throughout our organization.

7. Annual Review

The annual review of the Environmental Services and Advocacy Policy at NAP will assess the effectiveness of implemented objectives and initiatives. Key performance indicators will be analysed, including production waste reduction, recycling rates, training sessions conducted, customer engagement levels, and employee participation in sustainability programs. Feedback from employees, customers, and stakeholders will be collected to identify areas for improvement. Based on this analysis, updates to the policy and objectives will be made to ensure alignment with evolving environmental regulations, industry best practices, and technological advancements, reinforcing our commitment to sustainability and environmental advocacy.

8. Conclusion

NAP is dedicated to environmental services and advocacy as part of our overall commitment to sustainability and ESG principles. By establishing clear roles and responsibilities, setting measurable objectives, and fostering a culture of environmental awareness, we aim to make a positive impact on the environment and empower our customers to reduce their environmental footprints. Through continuous improvement and collaboration with our stakeholders, we will strive to lead the way in environmental responsibility within the plastics manufacturing industry.

20. CORRUPTION POLICY

NAP/ESG/PY/20

1. Introduction

NAP, as a leading manufacturer of plastic injection moulded components and assemblies in India, recognizes the importance of conducting business with integrity, accountability, and transparency. In line with our commitment to environmental, social, and governance (ESG) principles, we are resolute in upholding the highest ethical standards and complying with all anti-corruption laws. This policy outlines our company's stance against all forms of corruption, including bribery, fraud, and extortion, and aims to provide a clear framework for employees, partners, and stakeholders to identify, prevent, and report unethical behaviour. Through this policy, we seek to protect our reputation, ensure legal compliance, and foster a culture where all members of our organization adhere to ethical practices.

2. Scope

This Anti-Corruption Policy applies to all NAP employees, including management, contractors, suppliers, and other third-party entities involved in our business operations. It encompasses all forms of corruption, such as offering, promising, giving, accepting, or soliciting an advantage as an inducement for an action that may be illegal, unethical, or a breach of trust. Our commitment to combatting corruption extends to all levels of our organization and across all locations and jurisdictions in which we operate.

3. Roles and Responsibilities

3.1 Board of Directors:

The Board of Directors at NAP plays a critical role in fostering a culture of integrity and ethical conduct across the company. They provide strategic direction and leadership in anti-corruption efforts, setting a zero-tolerance tone for unethical practices. The Board is responsible for ensuring that adequate resources, such as training, monitoring systems, and investigative tools, are allocated to implement this Anti-Corruption Policy effectively. They actively oversee the policy's development, integration, and enforcement, regularly reviewing its relevance and effectiveness. By demonstrating unwavering commitment, the Board of Directors reinforces the company's dedication to transparency and legal compliance.

3.2Senior Management:

Senior management at NAP is tasked with the hands-on implementation of the Anti-Corruption Policy, actively promoting compliance at all levels. They lead by example, strictly adhering to anti-corruption standards to establish a culture where integrity is prioritized. This group ensures that their respective departments are aware of and comply with the policy, closely monitoring daily operations and addressing any policy-related issues. Senior management also supports the Compliance Officer in delivering training programs, encourages employees to report concerns, and collaborates on corrective actions when required.

3.3Compliance Officer:

The Compliance Officer is the cornerstone of NAP's anti-corruption efforts, responsible for designing and implementing effective training programs to build employee awareness and capability in identifying and preventing corruption. This officer conducts regular risk assessments, monitoring areas vulnerable to corruption within the organization. Serving as the point of contact for any corruption-related concerns, the Compliance Officer ensures that all reported incidents are documented and thoroughly investigated. They also maintain up-to-date records of corruption incidents, track resolutions, and compile reports for senior management review. Through proactive oversight and support, the Compliance Officer ensures policy adherence across all departments.

3.2 Employees:

Employees at NAP are expected to uphold the values and principles outlined in the Anti-Corruption Policy, contributing to a transparent and ethical work environment. They are required to report any known or suspected cases of corruption through designated channels, such as the Whistleblower mechanism, without fear of retaliation. Employees must participate in regular anti-corruption training and awareness sessions to stay informed about the latest regulations, company guidelines, and reporting protocols. By actively supporting the policy, employees contribute to the company's reputation for integrity and accountability, fostering trust within the organization and with external stakeholders.

3.5Third-Party Partners:

All suppliers, contractors, and business partners engaged with NAP are expected to operate in alignment with the company's anti-corruption standards. They are required to comply with anti-corruption clauses in contractual agreements, which outline expectations for ethical behaviour, transparency, and integrity. NAP conducts due diligence on third parties to assess their commitment to anti-corruption principles before establishing any formal relationship. These partners are encouraged to report any observed misconduct or suspected corruption within the company's operations. By cooperating with NAP's anti-corruption guidelines, third-party partners reinforce a shared commitment to ethical business practices.

4. Corruption Policy

4.1 Prohibition against Bribery and Corruption:

NAP maintains a strict prohibition against all forms of bribery and corruption. Employees and representatives are forbidden from offering, promising, giving, or receiving any improper advantage, either directly or indirectly, that could be construed as a means to influence business decisions or secure undue benefits. This includes financial payments, gifts, services, or favors that may create a conflict of interest or a perception of unfair business advantage. NAP expects all business activities to be conducted transparently and fairly, upholding legal and ethical standards. Any suspected bribery or corruption must be promptly reported to the Compliance Officer.

4.2 Gifts and Hospitality:

While NAP recognizes that exchanging gifts and hospitality is part of building business relationships, these exchanges must not influence, or appear to influence, business decisions. Employees must avoid accepting gifts or hospitality that could compromise their impartiality or be interpreted as an attempt to obtain favourable treatment. Any gifts or hospitality offered or received should be of nominal value, appropriate to the occasion, and must not exceed acceptable local norms. If unsure about the acceptability of a gift or hospitality, employees must seek guidance from the Compliance Officer, who will ensure compliance with company policies and maintain accurate records.

4.3 Facilitation Payments:

NAP strictly prohibits facilitation payments—small, unofficial payments made to expedite routine administrative processes. Employees are expected to refuse such requests and promptly report them to the Compliance Officer. The company provides support and guidance to employees who face demands for facilitation payments, ensuring they are equipped to handle these situations in a lawful and ethical manner. This approach helps maintain the integrity of our operations and safeguards the company from reputational risks. NAP takes a zero-tolerance stance toward facilitation payments, underscoring its commitment to conducting all transactions transparently and ethically.

4.3 Political Contributions and Sponsorships:

NAP prohibits political donations, sponsorships, or contributions that could be perceived as an attempt to influence government officials or gain favourable treatment. This policy ensures that all political activities remain separate from business interests. The company also requires that any charitable contributions or sponsorships align with company values and undergo approval by senior management to confirm compliance with this Anti-Corruption Policy. NAP is committed to ensuring that all sponsorships and donations serve legitimate charitable purposes without any potential for undue influence, reinforcing our commitment to fairness, transparency, and the highest ethical standards.

4.4 Due Diligence on Third Parties:

NAP conducts rigorous due diligence on all third-party partners, including suppliers, contractors, and agents, to ensure alignment with our anti-corruption standards. This due diligence includes evaluating the third-party's business ethics, reputation, and compliance with applicable anti-corruption laws. Before entering into any agreement, the company assesses the partner’s history, ethical practices, and adherence to legal standards. All third-party contracts include anti-corruption clauses, setting clear expectations for lawful and ethical behavior. Through these measures, NAP minimizes the risk of third-party misconduct, ensuring that our partnerships uphold our commitment to integrity and transparency.

4.5 Training and Awareness:

NAP s committed to ensuring that all employees and partners receive regular training on anti-corruption policies and practices. This training focuses on identifying potential bribery risks, ethical decision-making, and the proper channels for reporting concerns. By fostering a culture of integrity, we empower our workforce to recognize and address unethical behaviour, make informed decisions, and uphold the company's values in all business interactions. Through continuous education, we ensure that employees are well-equipped to navigate complex situations, reinforcing our commitment to transparency, accountability, and compliance with anti-corruption standards across the organization.

4.6 Whistleblower Protection:

NAP is committed to protecting employees who report suspected bribery or corruption from any form of retaliation. We encourage the reporting of unethical behaviour through secure and confidential channels to ensure employees feel safe when raising concerns. The company upholds Whistleblower protection in compliance with legal and regulatory requirements, safeguarding those who act in good faith to report misconduct. By fostering a transparent and accountable environment, we promote ethical behaviour across all levels of the organization, ensuring that employees can speak out without fear of retaliation, and reinforcing our commitment to integrity and compliance.

4.7 Internal Audits and Monitoring:

NAP conducts regular internal audits to identify and mitigate the risks of bribery and corruption within its operations. These audits assess compliance with anti-corruption policies, evaluate the effectiveness of controls, and ensure that corrective actions are taken promptly when necessary. The company also implements on-going monitoring of its transactions to ensure adherence to ethical standards and compliance with applicable laws. This proactive approach helps identify potential risks, maintain transparency, and safeguard the integrity of the company's operations, reinforcing our commitment to preventing corruption and promoting ethical business practices at all levels.

4.8 Reporting Violations:

Employees are encouraged to report any suspected violations of the anti-corruption policy immediately. NAP offers multiple confidential reporting channels, ensuring that individuals who report unethical conduct are protected from retaliation. These channels allow employees to raise concerns in a secure environment, reinforcing our commitment to transparency and accountability. Once a violation is reported, the company ensures that the matter is thoroughly investigated, with findings documented and reviewed. Appropriate disciplinary actions are taken when necessary, upholding the company's ethical standards and ensuring that any misconduct is addressed promptly and effectively.

4.9 Compliance with International Laws:

NAP is committed to ensuring compliance with global anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. The company operates with transparency and integrity, adhering to both local and international regulations to prevent corruption, bribery, and unethical practices in all its business dealings. By aligning our operations with these global standards, we reinforce our commitment to ethical conduct and legal compliance across all jurisdictions in which we operate. This approach helps mitigate risks, build trust, and maintain the highest standards of corporate governance and accountability.

4.10 Contractual Commitments:

NAP ensures that all employees and third-party partners adhere to the company's anti-corruption policies, which are explicitly integrated into contracts. These contractual clauses clearly outline the obligations and expectations for ethical conduct, emphasizing the importance of compliance with anti-corruption standards. The agreements specify the consequences for non-compliance, ensuring that all parties are aware of the potential disciplinary actions in case of violations. By incorporating these policies into contractual terms, NAP reinforces its commitment to maintaining ethical business practices and holds all stakeholders accountable for upholding the company's integrity.

5. Quantitative Objectives

Objective	Qualitative Objective	Unit of Measure	Target Value
Anti-Corruption Training	Ensure all employees are educated on anti-corruption practices	Percentage of employees trained	Maintain 100% Organized
Third-Party Due Diligence	Assess all new third-party partners for compliance with anti-corruption standards	Percentage of new partners assessed	95% of new partners annually
Reported Cases Resolution	Efficiently investigate and resolve reported corruption cases	Percentage of cases resolved within 30 days	90% of cases resolved
Whistleblower Awareness Program	Increase employee awareness of reporting channels	Percentage of employees aware of Whistleblower program	90% annually
Compliance Audits	Conduct regular audits to identify and mitigate corruption risks	Number of audits conducted per year	2 audits per year

6. Distribution

The Anti-Corruption Policy will be distributed to all employees, board members, contractors, and key stakeholders to ensure full awareness and compliance. It will be accessible on the company's internal portal, included in on boarding materials, and shared during training sessions and via email communications. Any updates or revisions to the policy will be promptly communicated to all relevant parties, ensuring they stay informed of the latest standards and requirements. This distribution process emphasizes NAP's commitment to transparency and ethical conduct, reinforcing the importance of the policy across all levels of the organization.

7. Annual Review

NAP will conduct an annual review of the Anti-Corruption Policy to ensure its effectiveness, relevance, and alignment with current legal standards and industry best practices. The Compliance Officer, working closely with senior management, will evaluate the policy's impact, identify areas for improvement, and update the policy as needed. This review will include input from employees, stakeholders, and audit findings to incorporate practical feedback and address emerging risks. By regularly revisiting and refining the policy, NAP reaffirms its commitment to ethical conduct and upholding ESG principles across all aspects of its operations.

8. Conclusion

NAP is dedicated to maintaining the highest ethical standards and eradicating corruption within its operations. This Anti-Corruption Policy provides a foundation for promoting transparency, integrity, and accountability throughout the company. By strictly following this policy, employees and stakeholders contribute to a culture of ethical conduct that enhances our reputation, fosters trust with partners, and supports a fair, sustainable business environment. Through collective commitment, we reinforce our dedication to responsible business practices that uphold our values, strengthen our organization, and support long-term growth in alignment with ESG principles.

21. CONFLICT OF INTEREST POLICY

NAP/ESG/PY/21

1. Introduction

At NAP, we are committed to maintaining the highest standards of integrity and transparency in our business operations. This Conflict of Interest Policy is established to prevent situations where personal interests might conflict with the interests of the company. A conflict of interest occurs when an individual is faced with a decision that could potentially benefit their personal interests over their responsibilities to the company. Such conflicts can undermine the trust that stakeholders place in our organization, harm our reputation, and impair our ability to make objective business decisions. Therefore, it is essential for all employees, management, and stakeholders to understand and adhere to this policy.

2. Scope

This policy applies to all employees, management, and board members of NAP, as well as contractors, consultants, and any other individuals or entities that represent the company. The policy is designed to guide the actions and decision-making processes of all stakeholders to avoid conflicts of interest and to promote transparency and accountability.

3. Roles and Responsibilities

3.1 Employees:

All employees are expected to have a thorough understanding of what constitutes a conflict of interest and to actively disclose any potential situations that could lead to such conflicts. This includes recognizing circumstances where personal interests may interfere with their professional duties. Employees must remain vigilant and avoid scenarios that could compromise their judgment or the integrity of their decision-making processes. It is crucial for employees to maintain transparency in their actions and to seek guidance when unsure if a situation may create a conflict of interest, thereby upholding the company's ethical standards.

3.2 Management:

Management plays a vital role in fostering awareness and understanding of the Conflict of Interest Policy among all employees. They are responsible for providing clear guidance on how to identify and manage potential conflicts of interest. This involves creating an environment where employees feel comfortable disclosing any concerns without fear of retaliation. Management must also take immediate and appropriate action when conflicts are reported, ensuring that the integrity of business decisions is maintained. By leading by example and promoting ethical behaviour, management can reinforce the importance of compliance with this policy throughout the organization.

3.3 Board Members:

Board members have a critical obligation to ensure that the company's policies, including the Conflict of Interest Policy, comply with all relevant laws and regulations. They are required to disclose any personal interests that may conflict with their responsibilities as board members, thereby promoting transparency and accountability at the highest level of governance. By proactively identifying and addressing potential conflicts, board members can help safeguard the company's reputation and maintain the trust of stakeholders. Their commitment to ethical governance sets a standard for the entire organization, encouraging a culture of integrity and responsibility.

3.4 Compliance Officer:

The Compliance Officer is responsible for overseeing the implementation and enforcement of the Conflict of Interest Policy within NAP. This includes reviewing disclosures of potential conflicts of interest and determining appropriate actions to mitigate any identified risks. The Compliance Officer will also facilitate training sessions for employees to enhance their understanding of potential conflicts and the importance of transparency. Additionally, they will monitor compliance with the policy and provide on-going support to management and staff in navigating complex situations. By fostering an environment of ethical conduct, the Compliance Officer plays a key role in maintaining the organization’s integrity.

4. Conflict of Interest Policy

4.1 Review and Management of Conflicts:

Upon disclosure of a potential conflict of interest, the Compliance Officer will conduct a thorough review of the situation to assess whether a conflict exists. If a conflict is confirmed, the company will implement appropriate measures to address it. These actions may include the reassignment of duties to eliminate any conflicts, termination of relationships with parties involved in the conflict, or other mitigation strategies to safeguard the integrity of decision-making processes. The primary goal is to ensure that all employees can perform their responsibilities without personal interests compromising their judgment or the company's ethical standards.

4.2 Gifts and Hospitality:

Employees must refrain from accepting gifts or hospitality that could potentially influence their decision-making or create a perception of bias. To maintain transparency and integrity, any gifts or benefits exceeding a specified value, such as INR 500, must be reported to management for prior approval. This policy aims to prevent situations where personal interests could compromise professional judgment. Employees are encouraged to use discretion and prioritize ethical considerations in their interactions with clients, suppliers, and other stakeholders, ensuring that all business decisions are made solely in the best interests of NAP and its stakeholders.

4.3 Post-Employment Obligations:

Former employees of NAP have a duty to uphold the confidentiality of sensitive information and proprietary data acquired during their tenure. They are prohibited from disclosing any confidential information or utilizing established company relationships for personal gain after their departure. This obligation extends indefinitely, ensuring that the integrity of the company’s operations and competitive position remains protected. By adhering to these post-employment obligations, former employees contribute to maintaining trust with clients, partners, and stakeholders, reinforcing NAP's commitment to ethical conduct and responsible business practices even after their employment has ended.

4.4 Disclosure of Potential Conflicts:

Employees must proactively disclose any personal, financial, or familial interests that may create a conflict of interest. This includes involvement in outside business activities, investments, or relationships with vendors, customers, or competitors that could influence their decisions or actions at NAP. Early disclosure is essential to identify and address conflicts before they can compromise the company's operations, reputation, or integrity. By being transparent, employees help ensure that the company's interests remain the top priority in all business dealings, fostering a culture of accountability and ethical decision-making.

4.5 Outside Employment and Business Activities:

Employees must obtain prior approval from management before engaging in outside employment or business activities that could conflict with their responsibilities at NAP. This policy aims to prevent divided loyalty, ensuring that outside engagements do not interfere with work performance or ethical standards. Outside activities should not detract from the employee's commitment to the company's goals, operational efficiency, or reputation. By seeking approval, employees help safeguard the company's interests, ensuring that personal ventures do not present potential conflicts or compromise the quality of their professional contributions.

4.6 Family and Personal Relationships:

Employees must disclose any family or personal relationships with colleagues, suppliers, or customers that could potentially affect business decisions or create conflicts of interest. These relationships should be managed transparently to avoid perceptions of favouritism, bias, or unfair advantage. Full disclosure ensures that decisions made in the workplace are fair, objective, and free from personal influences. By addressing these relationships appropriately, NAP ensures that its operations remain ethical, impartial, and aligned with its commitment to fairness, integrity, and equal treatment in all business dealings.

4.7 Investments and Financial Interests:

Employees must disclose any investments or financial interests they hold in companies that do business with, or compete against, NAP. This includes ownership of stocks, shares, or other equity interests in relevant firms. Disclosure helps to ensure that decisions made by employees are in the best interests of the company and free from personal financial influence. By monitoring these interests, the company can mitigate potential conflicts of interest, ensuring that employee actions do not compromise the organization's strategic goals, reputation, or ethical standards.

4.8 Use of Company Resources:

Employees are prohibited from using NAP's resources—physical, intellectual, or financial—for personal gain. This includes the misuse of company time, assets, or intellectual property for non-work-related activities. Any personal use of company resources must be minimal and should not interfere with work duties or negatively affect the company's operations. Ethical and responsible use of company resources is essential for promoting operational efficiency, reducing waste, and maintaining a culture of integrity. Employees are expected to prioritize company objectives, ensure optimal use of assets, and uphold NAP's ethical standards in all activities.

4.9 Contractual Relationships:

Employees must disclose any personal or financial interest in contracts that NAP enters into, including relationships with suppliers, customers, or business partners. Such disclosures help identify potential conflicts of interest and ensure that decisions regarding vendor selection, negotiations, and other contractual matters are fair and impartial. Transparency in these disclosures prevents biases and promotes ethical decision-making. By addressing conflicts early, the company maintains integrity in its business dealings, ensuring that all relationships are conducted in the best interests of NAP and its stakeholders, aligning with its commitment to ethical business practices.

4.10 Management of Multiple Roles:

Employees in leadership or managerial positions must disclose any external roles or responsibilities that could present a conflict of interest with their duties at NAP. This includes board memberships, advisory roles, or significant external commitments that may impact their ability to prioritize the company's best interests. Disclosure ensures that these external obligations do not interfere with the employee's professional duties. By managing multiple roles transparently, NAP upholds leadership integrity and ensures that decisions are made with full focus on the company's goals, promoting ethical practices and organizational alignment.

5. Quantitative Objectives

Objective	Unit of Measure	Target Value
Increase awareness of the Conflict of Interest policy among employees	Percentage of employees trained	90%
Reduction in reported conflicts of interest	Number of reported conflicts per quarter	Less than 5
Timely resolution of disclosed conflicts	Average days to resolve conflicts	Within 10 days
Maintain compliance with legal standards regarding conflicts of interest	Percentage of compliance audits passed	Maintaining 100% Organized
Improve reporting of potential conflicts by employees	Percentage increase in disclosures year over year	20% increase annually

6. Distribution

The Conflict of Interest Policy will be disseminated to all employees, management, and board members at NAP to ensure widespread awareness and understanding. It will be accessible through the company's internal communication platforms and intranet for easy reference. New employees will receive a copy of this policy during their on boarding process to integrate ethical practices from the outset. Additionally, existing employees will participate in periodic training sessions to reinforce their knowledge of the policy and its implications. This proactive approach aims to foster a culture of compliance and accountability throughout the organization.

7. Annual Review

The Conflict of Interest Policy will undergo an annual review conducted by the Compliance Officer to assess its effectiveness and ensure alignment with applicable laws and regulations. This review process will incorporate feedback from employees and management regarding their experiences with the policy and its implementation. Any identified areas for improvement will be addressed, and necessary revisions will be made to enhance clarity and effectiveness. Following the review, updated versions of the policy will be communicated to all stakeholders to ensure on-going awareness and understanding, reinforcing NAP's commitment to ethical conduct and compliance.

8. Conclusion

NAP is dedicated to maintaining the highest ethical standards and actively preventing conflicts of interest in all business practices. By implementing this Conflict of Interest Policy, we strive to cultivate a culture of integrity, transparency, and accountability throughout our organization. We expect all stakeholders to prioritize the best interests of the company and to promptly report any potential conflicts they encounter. Through collective commitment and vigilance, we can ensure that our operations are carried out with the utmost respect for ethical principles, ultimately safeguarding our reputation and fostering trust within our business relationships.

22. FRAUD POLICY

NAP/ESG/PY/22

1. Introduction

NAP is committed to conducting business with integrity, transparency, and ethical practices. Fraud undermines these values and can have serious repercussions, including financial loss, legal penalties, and damage to our reputation. This Fraud Policy outlines our commitment to preventing, detecting, and responding to fraudulent activities. It establishes a framework that promotes honesty and accountability among employees and stakeholders, ensuring that NAP remains a trustworthy entity in the manufacturing of plastic injection-molded components and assemblies.

2. Scope

This policy applies to all employees, officers, and directors of NAP, as well as third parties, including suppliers, contractors, and agents acting on behalf of the company. The policy encompasses all aspects of the company's operations and interactions with stakeholders, aiming to prevent and mitigate fraud in every area of our business.

3. Roles and Responsibilities

To ensure effective implementation of this policy, the following roles and responsibilities are defined:

3.1 Board of Directors:

The Board of Directors is responsible for providing comprehensive oversight of the fraud prevention framework within the organization. Their duties include routinely reviewing and evaluating the effectiveness of the fraud prevention policy, ensuring it aligns with industry standards and regulatory requirements. By doing so, they actively contribute to refining fraud detection and prevention strategies. The Board examines the organization’s risk environment and promotes continuous improvement by suggesting enhancements to the policy as needed. Their commitment to oversight fosters an organizational culture that prioritizes transparency, ethical conduct, and accountability in all financial practices.

3.2 Management:

Management plays a vital role in cultivating a culture of integrity and ethical behaviour across the organization. Their responsibility involves ensuring that all employees receive appropriate training on the fraud prevention policy, fostering a clear understanding of individual responsibilities in maintaining ethical standards. Additionally, management is tasked with the investigation of any reported incidents of fraud; ensuring timely and effective corrective actions are taken. By actively supporting transparency and accountability, they reinforce an ethical workplace culture and demonstrate a zero-tolerance stance on fraud, contributing to the organization's overall integrity.

3.3 Internal Audit Department:

The Internal Audit Department is charged with regularly assessing fraud risks and evaluating the effectiveness of the organization's internal controls. Through scheduled audits and assessments, the department identifies potential vulnerabilities within processes and procedures that could lead to fraudulent activity. Findings from these audits are reported directly to the Board of Directors, providing key insights for potential improvements. The department plays an essential role in recommending procedural enhancements and ensuring robust defences against fraud, thereby bolstering the organization's resilience against fraud risks and enhancing accountability.

3.4 Compliance Officer:

The Compliance Officer serves as the central point of contact for all fraud-related concerns, ensuring that employees have a designated resource for reporting potential issues. This role involves guiding the organization's adherence to the fraud prevention policy and related regulations, offering advice and support to employees. By proactively addressing fraud risks and providing clear direction on compliance matters, the Compliance Officer helps maintain ethical standards within the organization. Their work ensures that fraud prevention measures are consistently applied and that employees understand their role in safeguarding the organization's integrity.

3.5 Employees:

Employees have a fundamental responsibility to adhere to the principles outlined in the fraud prevention policy, actively contributing to a culture of integrity and accountability. They are expected to report any suspected fraudulent activities promptly, helping to identify and mitigate risks before they escalate. Participation in training programs is essential, as it enhances employees' awareness of potential fraud risks and reinforces their understanding of ethical practices. By remaining vigilant and informed, employees play a key role in detecting fraud and maintaining a secure, compliant work environment aligned with organizational values.

4. Fraud Policy

4.1 Fraud Prevention Measures:

Fraud prevention measures are essential to safeguard organizational integrity and minimize risks. Regular risk assessments help identify and address potential vulnerabilities, ensuring that the organization stays proactive in mitigating fraud-related risks. Strong internal controls, such as segregation of duties and proper authorization processes, are established to enhance accountability and maintain checks and balances across operations. Comprehensive employee training programs focus on fraud awareness, detection, and reporting procedures, empowering staff to recognize and act on potential threats. Additionally, a Whistleblower policy ensures a confidential and secure reporting system, encouraging employees to report suspected fraud without fear of retaliation.

4.2 Fraud Detection Measures:

Fraud detection measures are crucial for identifying and addressing suspicious activities within an organization. Monitoring systems, including data analytics and specialized tools, help detect irregular transactions or unusual patterns that may indicate fraudulent behaviour, enabling early intervention. Regular internal audits play a critical role by evaluating adherence to fraud prevention policies and assessing the strength of internal controls, ensuring that processes remain effective in preventing fraud. Additionally, a dedicated incident reporting mechanism allows employees to easily report concerns about potential fraud or unethical conduct, fostering a culture of transparency and empowering staff to support fraud detection efforts actively.

4.3 Response to Fraud Incidents:

In response to suspected fraud incidents, NAP follows a structured approach to address and prevent future occurrences. First, a comprehensive and unbiased investigation is conducted, involving relevant stakeholders to ensure thorough analysis. If an employee is found to have engaged in fraud, appropriate disciplinary actions are taken, which may include termination and, if warranted, legal action. After an incident, internal controls, policies, and training programs are reviewed and strengthened to mitigate the risk of recurrence. Additionally, any illegal activities are reported to the appropriate authorities, ensuring the organization remains compliant with legal obligations.

4.4 Fraud Risk Assessment:

NAP conducts regular fraud risk assessments to identify vulnerabilities in its processes, systems, and practices that could be exploited for fraudulent activities. These evaluations examine potential fraud risks across departments, transactions, and business operations. Based on the findings, appropriate mitigation strategies are developed to reduce risk and strengthen the company's fraud prevention framework. By regularly assessing and addressing potential fraud risks, NAP ensures its operations remain secure and that its internal controls effectively prevent fraud from occurring, preserving the integrity of the organization.

4.5 Employee Code of Conduct:

NAP enforces a strict Employee Code of Conduct that outlines clear expectations for ethical behaviour in the workplace. Employees are required to uphold high standards of integrity, transparency, and professionalism in all their actions. Any violations of the code, including involvement in fraudulent activities, will lead to disciplinary action. This policy helps ensure that all personnel understand the importance of ethical conduct and accountability. By defining acceptable behaviour and reinforcing the company's commitment to ethical practices, NAP fosters a work environment where fraud and unethical conduct are not tolerated and are addressed swiftly.

4.6 Third-Party Fraud Prevention:

NAP proactively manages fraud risks associated with third-party partners such as suppliers, contractors, and vendors. The company conducts thorough due diligence to assess the integrity and ethical standards of its third-party partners. All agreements with external parties include provisions to safeguard against fraudulent activities, ensuring that these partners comply with the company's anti-fraud policies.

By monitoring third-party relationships and embedding anti-fraud clauses into contracts, NAP minimizes the risk of fraud originating outside the company and ensures that its business partners adhere to the same high ethical standards.

4.7 Internal and External Audits:

NAP regularly conducts both internal and external audits to identify potential fraud risks and ensure compliance with its anti-fraud policies. These audits assess the effectiveness of internal controls, fraud prevention measures, and transaction processes, providing an independent review of financial and operational activities. By performing routine audits, the company can detect discrepancies or suspicious activity early and take corrective action. Audits ensure that the company's operations are transparent, its financial reports are accurate, and any vulnerability in fraud prevention is addressed promptly, supporting a culture of accountability.

4.8 Management Accountability:

Managers at NAP are accountable for maintaining effective fraud prevention measures within their departments. They are responsible for fostering awareness of fraud risks, enforcing company policies, and ensuring that systems and controls are in place to minimize fraud opportunities. Managers must also ensure that their teams are properly trained to identify, report, and address suspicious activities. By holding managers accountable for fraud prevention, the company ensures that ethical standards are upheld at all levels and that employees understand the importance of maintaining a fraud-free workplace.

4.9 Fraud Prevention Training:

NAP provides comprehensive fraud prevention training to all employees, focusing on the identification of fraud risks, understanding common fraud schemes, and learning the proper reporting protocols. This training empowers employees to recognize signs of fraudulent activity and to take appropriate action. It also emphasizes the consequences of fraud and reinforces the importance of maintaining an ethical and transparent work environment. By equipping employees with the knowledge and tools to prevent fraud, the company strengthens its defences and fosters a culture of integrity throughout its workforce.

4.10 Fraud Prevention in Financial Transactions:

To prevent fraud in financial transactions, NAP has implemented robust controls on payments, invoicing, and financial approvals. A segregation of duties is enforced, ensuring that no single individual is responsible for both initiating and approving financial transactions. This minimizes the risk of fraudulent activities going undetected and ensures that transactions are properly scrutinized before being finalized. By maintaining strict financial controls and promoting transparency, the company protects itself against financial fraud and ensures the accuracy and integrity of its financial operations.

5. Quantitative Objectives

To measure the effectiveness of this Fraud Policy, NAP will establish the following quantitative objectives:

Objective	Unit of Measure	Target Value	Qualitative Objective
Reduce reported fraud incidents	Number of incidents	Less than 5 per year	Foster a culture of integrity and ethics
Increase employee fraud awareness training	Percentage of employees trained	100% annually	Enhance employee knowledge and skills
Improve fraud detection rate	Percentage of detected fraud incidents	90% of incidents investigated	Strengthen monitoring and detection capabilities
Conduct regular internal audits	Number of audits performed	4 audits per year	Reinforce internal controls and compliance
Maintain effective Whistleblower mechanism utilization	Number of reports received	10 reports per year	Encourage reporting of suspicious activities

6. Distribution

The Fraud Policy of NAP will be widely distributed to ensure all employees understand its importance and their responsibilities. Each employee will receive a copy of the policy, and it will be incorporated into the employee handbook as a key reference. For convenient access, the policy will also be available on the company intranet. New employees will be given a copy during on boarding, reinforcing the organization's commitment to integrity and compliance from the start. By embedding this policy in multiple accessible formats, NAP fosters awareness and encourages adherence to fraud prevention standards across the workforce.

7. Annual Review

NAP is committed to regularly enhancing its Fraud Policy to maintain high standards of fraud prevention. Each year, the Board of Directors and the Compliance Officer will review the policy to assess its effectiveness and relevance in light of evolving laws, regulations, and industry best practices. Any necessary updates or revisions will be promptly made to strengthen the policy's impact. Employees will be notified of significant changes, ensuring transparency and continued compliance across the organization. This annual review process demonstrates NAP's dedication to safeguarding integrity and fostering a culture of ethical behaviour.

8. Conclusion

NAP acknowledges that fraud is a serious risk to our business integrity and long-term success. Through this Fraud Policy, we affirm our commitment to preventing fraudulent activities and promoting a culture grounded in accountability and transparency. Every employee is vital in safeguarding our organization, and we encourage open communication and the proactive reporting of any suspicious activities. By working together, we can maintain the highest ethical standards and ensure the protection of our company's values, the interests of our employees, and the trust of our stakeholders. This united effort strengthens our foundation for sustainable success.

23. MONEY LAUNDERING POLICY

NAP/ESG/PY/23

1. Introduction

NAP is committed to upholding the highest standards of ethical conduct and compliance with all applicable laws and regulations. This Money Laundering Prevention Policy establishes our commitment to preventing any involvement in money laundering activities, which involve concealing the origin, ownership, or destination of illegally or dishonestly obtained money to make it appear legitimate. The purpose of this policy is to outline our responsibilities, set out clear guidelines, and implement robust measures that ensure all employees, agents, and partners comply with relevant anti-money laundering (AML) regulations. As part of our commitment to ESG (Environmental, Social, and Governance) principles, we seek to uphold transparency, integrity, and ethical conduct in all our business operations.

2. Scope

This policy applies to all employees, contractors, agents, and business partners of NAP involved in any financial or transactional activities. It covers all operations within India and extends to any subsidiary, affiliate, or third-party entity associated with the company. The policy aims to ensure compliance, integrity, and transparency in all financial dealings, safeguarding the interests of NAP and its stakeholders. All parties engaged in these operations are expected to adhere to the established guidelines and procedures outlined to maintain high standards of ethical conduct and financial accountability across the organization.

3. Roles and Responsibilities

3.1 Board of Directors:

The Board of Directors sets the overarching tone for NAP's anti-money laundering (AML) efforts by approving the policy content and ensuring its alignment with the company's objectives. They are responsible for fostering a culture of compliance, holding the organization accountable, and making sure that AML principles are prioritized at all levels. The Board also ensures that sufficient resources and support are allocated for effective implementation and that the company remains committed to preventing financial crimes, in line with legal and regulatory requirements.

3.2 Chief Compliance Officer (CCO):

The Chief Compliance Officer (CCO) plays a crucial role in overseeing the effective implementation of the AML policy across the organization. The CCO coordinates regular training programs, ensuring that employees understand the policy's guidelines and regulatory requirements. They are responsible for monitoring the organization's AML compliance, identifying potential risks, and investigating any suspected AML-related activities. The CCO also works closely with the Board and senior management to provide regular updates on the company's AML efforts and to recommend improvements where necessary to enhance policy effectiveness.

3.3 Management Team:

The Management Team ensures that all departmental operations align with the company's AML regulations and policies. They are responsible for maintaining internal processes and controls that adhere to legal and regulatory standards. Working closely with the compliance team, management is expected to oversee the day-to-day implementation of the AML policy, ensuring that employees follow established procedures and promptly report any suspicious activities. Management also collaborates with internal and external stakeholders to maintain a proactive stance against money laundering risks and supports efforts to identify and mitigate potential threats.

3.4 Employees:

All employees are critical to the success of NAP's AML program. They are expected to fully understand the policy's contents and actively adhere to its guidelines in all transactions and operations. Employees must report any suspicious activities or transactions to the appropriate authorities or compliance team as part of their responsibility to safeguard the company against financial crimes. Regular training ensures that employees are equipped with the knowledge to recognize potential money laundering activities, helping to maintain a vigilant and compliant work environment that supports the company's broader AML objectives.

3.5 Internal Audit Team:

The Internal Audit Team is tasked with conducting comprehensive annual audits to evaluate the effectiveness of the company's AML measures. They assess whether the organization is in compliance with AML policies and procedures and ensure adherence to key quantitative objectives. The audit team identifies areas for improvement, verifies the robustness of existing controls, and provides recommendations to senior management.

By independently reviewing processes and practices, the Internal Audit Team helps to ensure that AML efforts are functioning as intended, providing an additional layer of accountability to mitigate risks associated with financial crimes.

4. Money Laundering Policy

4.1 Prohibited Activities:

NAP strictly prohibits any activities that involve concealing or disguising the nature, origin, location, ownership, or control of money obtained through criminal activities. This includes engaging in transactions designed to facilitate money laundering, such as structuring payments or transactions to evade regulatory reporting requirements. The company also prohibits working with third parties or business partners who fail to provide adequate assurance of compliance with anti-money laundering (AML) regulations. All employees and business associates are expected to adhere to these restrictions, ensuring that no funds derived from illicit activities are processed or concealed through the company's operations.

4.2 Know Your Customer (KYC) Procedures:

To prevent money laundering, NAP enforces strict KYC requirements for all customers and business partners. Customer Identification mandates the submission of valid identification documents, such as government-issued IDs, business registration certificates, and proof of address. Verification involves cross-checking the provided information against reliable, independent sources; any discrepancies must be resolved before proceeding with transactions. Additionally, Risk Assessment is conducted for every customer and transaction, with higher-risk individuals or organizations subjected to enhanced due diligence. These procedures help ensure that the company only engages in legitimate, transparent business activities, in compliance with regulatory standards.

4.3 Transaction Monitoring:

NAP actively monitors transactions to identify unusual patterns or inconsistencies that may indicate potential money laundering activities. Transactions exceeding specified thresholds will undergo additional scrutiny, particularly in the following circumstances: Large Cash Transactions—especially those that appear inconsistent with the customer's normal activity; High-Risk Jurisdictions—transactions involving countries or regions known for lax anti-money laundering regulations or high levels of financial crime; Multiple Small Transactions—several smaller transactions that cumulatively exceed typical volumes, which may be structured to avoid detection. These monitoring practices help mitigate risks and ensure compliance with AML regulations.

4.4 Records-Keeping:

To ensure compliance with regulatory requirements, NAP maintains comprehensive records of all transactions, customer identification, and due diligence documentation for a minimum of five years. These records include Transaction Details such as amounts, dates, and parties involved; Correspondence and Agreements with clients related to business transactions; and Risk Assessments along with any findings from enhanced due diligence procedures. These records are securely stored and readily accessible for review by regulatory authorities or internal audits, supporting the company's commitment to transparency, accountability, and compliance with anti-money laundering regulations.

4.5 Reporting Suspicious Activity:

All employees are required to promptly report any suspicious activity or transactions to the Chief Compliance Officer (CCO). The CCO will assess the report, conduct a thorough investigation, and, if warranted, escalate the matter to the relevant regulatory authorities. To encourage compliance and ensure confidentiality, NAPhas established a clear, secure reporting mechanism that allows employees to raise concerns without fear of retaliation. This process ensures that potential money laundering activities are identified and addressed in a timely manner, safeguarding the integrity of the company and its operations.

4.6 Training and Awareness:

NAP provides mandatory annual anti-money laundering (AML) training for all employees to ensure compliance with regulatory requirements and company policies. The training includes an Overview of Money Laundering Risks and the company's AML policy, helping employees understand the potential risks and their role in mitigating them. It also covers how to Identify and Report Suspicious Activity, empowering employees to recognize signs of money laundering. Additionally, the training outlines Responsibilities under KYC and Due Diligence Protocols, ensuring that employees are well-equipped to adhere to customer verification and transaction monitoring procedures effectively.

4.7 Enhanced Due Diligence (EDD):

NAP implements Enhanced Due Diligence (EDD) for high-risk customers or transactions. This includes a deeper investigation into the customer's background, source of funds, and transaction purpose. EDD is required for transactions involving Politically Exposed Persons (PEPs), high-risk jurisdictions, or unusual transaction patterns suggesting money laundering.

The company ensures that all high-risk transactions are thoroughly vetted, documented, and reported, ensuring that potential risks are mitigated and compliance with anti-money laundering regulations is maintained.

4.8 Risk-Based Approach:

NAP employs a risk-based approach to anti-money laundering (AML) compliance, tailoring its efforts to the level of risk each transaction or customer presents. By evaluating factors such as customer type, geographic location, transaction volume, and industry, the company determines the appropriate level of due diligence required. This strategy allows the company to allocate resources efficiently, ensuring that higher-risk areas receive heightened scrutiny while maintaining overall compliance with AML regulations. The approach helps minimize potential exposure to money laundering activities while optimizing the effectiveness of AML controls across the organization.

4.9 Anti-Money Laundering (AML) Compliance Officer:

The Chief Compliance Officer (CCO) at NAP plays a critical role in overseeing the company's Anti-Money Laundering (AML) compliance program. The CCO ensures the organization adheres to all relevant AML laws and regulations, manages employee training on AML best practices, and coordinates the reporting of suspicious activities. The officer is also responsible for regularly updating the company's AML procedures to stay aligned with evolving legal and regulatory requirements. Through this leadership, the CCO fosters a strong culture of anti-money laundering awareness, ensuring that the company effectively mitigates risks and maintains compliance across its operations.

4.10 Third-Party Risk Management:

NAP conducts thorough due diligence on third-party partners, including suppliers, contractors, and business associates, to ensure compliance with Anti-Money Laundering (AML) regulations. This evaluation process is critical in preventing the company from being inadvertently involved in money laundering activities through its business relationships. Only third parties that meet stringent AML standards are engaged, reducing the risk of financial crimes entering the company’s supply chain. This proactive approach ensures that the company's operations remain secure and compliant, reinforcing a strong AML framework across all external partnerships and minimizing potential risks to the organization.

5. Quantitative Objectives

To ensure effectiveness, NAP has set the following quantitative and qualitative objectives:

Objective	Qualitative Objective	Unit of Measure	Target Value
1. Ensure 100% KYC compliance for new customers.	Effective customer on boarding	Percentage	Maintaining 100% Organized
2. Conduct enhanced due diligence for high-risk clients	Risk mitigation	Percentage of cases	95%
3. Complete mandatory AML training for all staff annually	Awareness and prevention	Percentage	Maintaining 100% Organized
4. Review and update transaction monitoring system	Effective detection	Instances reviewed	Quarterly
5. Report suspicious activity within 24 hours of identification	Prompt reporting	Hours	24 hours

6. Distribution

NAP mandates annual anti-money laundering (AML) training for all employees to ensure compliance with regulatory requirements and company policies. The training provides an overview of money laundering risks and the company's AML policy, helping employees understand the risks and their role in preventing them. It also covers how to identify and report suspicious activity, enabling employees to detect potential signs of money laundering. Additionally, the training highlights responsibilities under KYC and due diligence protocols, ensuring employees are equipped to follow proper procedures for customer verification, transaction monitoring, and compliance with regulatory standards.

7. Annual Review

The Money Laundering Prevention Policy will undergo an annual review led by the Chief Compliance Officer (CCO) in collaboration with the internal audit team. This review will assess the policy's effectiveness, ensure adherence to quantitative objectives, and identify any areas requiring improvement.

The CCO and audit team will analyze the implementation of the policy, its impact on operations, and compliance with regulatory standards. Based on the findings, necessary revisions or updates will be made to enhance the policy. Any changes or updates to the policy will require approval from the Board of Directors before implementation.

8. Conclusion

NAP is deeply committed to anti-money laundering (AML) efforts, reflecting our dedication to ethical and transparent business practices. Through the implementation of robust procedures and clear quantitative objectives, we aim to prevent any involvement in illegal financial activities and positively impact the economic landscape. We encourage all employees, contractors, and business partners to familiarize themselves with this policy, stay vigilant, and actively contribute to maintaining a culture of compliance and integrity. By working together, we can safeguard the company from financial crime and ensure the continued success of our operations.

24. INFORMATION SECURITY POLICY

NAP/ESG/PY/24

1. Introduction

NAP is committed to safeguarding the confidentiality, integrity, and availability of information within our organization. As a manufacturing company specializing in plastic injection-moulded components and assemblies, we recognize that information security is integral to our operations and our commitment to Environmental, Social, and Governance (ESG) principles. This policy outlines the standards and procedures we implement to protect company data, prevent unauthorized access, secure third-party information, and prevent activities that may compromise the integrity of financial or operational data, including those that could contribute to money laundering.

2. Scope

This Information Security Policy applies to all employees, contractors, third-party service providers, and anyone who accesses, processes, or manages data on behalf of NAP. It covers the protection of company information assets, both digital and physical, as well as third-party information handled by the company. The policy encompasses all operations involving the collection, processing, and storage of information for business and regulatory purposes. Additionally, it outlines measures to prevent, detect, and respond to unauthorized activities, including the concealment of the origin, ownership, or destination of data related to illegally or dishonestly obtained funds, ensuring secure operations.

3. Roles and Responsibilities

3.1 Information Security Officer (ISO):

The Information Security Officer (ISO) is responsible for overseeing the implementation and compliance of the Information Security Policy at NAP. The ISO conducts regular risk assessments to identify potential vulnerabilities and ensures that the company's information security measures align with organizational goals and regulatory requirements. Additionally, the ISO is tasked with maintaining a secure environment for handling third-party information, ensuring that all data is managed with the highest standards of confidentiality, integrity, and availability. The ISO also monitors and responds to security incidents, continuously improving the company's security posture to mitigate potential threats.

3.2 IT Department:

The IT Department is responsible for implementing technical security controls to safeguard information assets at NAP. This includes managing access control, encryption, and continuous monitoring to protect data from unauthorized access or breaches. The department also provides secure data storage solutions, ensuring data is backed up regularly and establishing robust data backup and recovery protocols to maintain business continuity. Additionally, the IT team oversees the secure collection, storage, and disposal of data, ensuring compliance with regulatory standards and minimizing the risk of data leaks or unauthorized access throughout its lifecycle.

3.3 Department Managers:

Department Managers are responsible for ensuring that all employees within their teams understand and adhere to the company's information security protocols. They promote awareness of information security policies and ensure that staffs are properly trained on best practices for protecting sensitive data. Managers also play a key role in fostering a culture of security within their departments, encouraging vigilance and compliance. In the event of a security incident or potential breach, Department Managers must promptly report the issue to the Information Security Officer (ISO) for investigation and appropriate action to mitigate risks and prevent further damage.

3.4 Employees:

Employees are required to comply with all aspects of the Information Security Policy, following the established guidelines for safeguarding company data and assets. They must remain vigilant and report any suspected security incidents or weaknesses in security protocols to their immediate supervisor or the Information Security Officer (ISO) without delay. Employees are also expected to participate in regular information security training sessions to stay updated on security best practices, emerging threats, and company policies. Their active involvement in maintaining a secure environment is essential to protecting the organization from potential security breaches and data vulnerabilities.

3.5 Third-Party Service Providers:

Third-party service providers must adhere to NAP's information security guidelines to ensure the protection of company data and assets. They are responsible for safeguarding any information they handle on behalf of the company, ensuring it is managed in accordance with contract specifications and established security standards. Providers must implement appropriate technical and organizational measures to protect sensitive data, including encryption, access controls, and secure storage practices. Any potential security incidents or breaches must be reported to NAP promptly, and providers must cooperate with the company to mitigate risks and maintain data integrity.

4. Information Security Policy

4.1 Data Classification and Access Control:

NAP classifies data according to its sensitivity and applies appropriate access controls to ensure its protection. Public Data refers to non-sensitive information available for public dissemination. Internal Data is for internal use only, accessible to employees within the organization. Confidential Data consists of highly sensitive information, restricted to authorized personnel only. Access to each data classification is granted based on roles and responsibilities, adhering to the principle of least privilege—ensuring employees and stakeholders only have access to the data necessary for their specific job functions. Strict access controls are enforced to minimize data exposure.

4.2 Data Protection and Confidentiality:

NAP ensures robust data protection through the following measures: Encryption—Confidential information, both in transit and at rest, must be encrypted using industry-standard encryption protocols to protect against unauthorized access. Physical Security—Sensitive data stored in physical form must be kept in secure environments with locked storage, restricted access, and surveillance to prevent unauthorized access. Secure Disposal—Any data that is no longer needed must be securely destroyed, whether digitally or physically, to prevent unauthorized retrieval or misuse. These measures help ensure the confidentiality, integrity, and availability of sensitive information throughout its lifecycle.

4.3 Network Security:

NAP employs comprehensive network security measures to protect its systems and data. Firewall Management ensures that firewalls are installed and continuously maintained to monitor and control incoming and outgoing network traffic, blocking potential threats. Antivirus and Anti-malware solutions are deployed across all company systems, kept up-to-date to protect against malicious software, ensuring the integrity of company networks. Additionally, Intrusion Detection systems are in place to monitor for unauthorized access or abnormal activity, providing real-time alerts and enabling swift response to potential security breaches. These measures work together to safeguard the company's network infrastructure from external and internal threats.

4.4 Incident Response and Management:

In the event of a security breach, NAP follows a structured response protocol to minimize damage. First, affected systems are immediately isolated and containment procedures are initiated to prevent further compromise. Relevant stakeholders and any third-party information owners are notified as appropriate. A thorough investigation is then conducted to determine the cause and impact of the incident, with corrective actions implemented to address any vulnerabilities. The incident is documented and reviewed to identify lessons learned and improve future response strategies, ensuring that preventive measures are put in place to avoid recurrence.

4.5 Compliance with Regulatory Standards:

NAP is committed to adhering to all applicable information security regulations and standards. This includes compliance with data protection laws that govern the secure collection, processing, and storage of third-party information, ensuring privacy and confidentiality. Additionally, the company follows regulations related to financial transaction monitoring to prevent money laundering activities. By tracking the origin, ownership, and destination of funds, NAP ensures that all financial transactions meet regulatory requirements, mitigating the risk of involvement in illicit financial activities and safeguarding the organization against potential legal and financial consequences.6. Data Integrity and Prevention of Fraudulent Activities

4.6 Data Integrity and Prevention of Fraudulent Activities:

NAP employs robust measures to ensure the integrity of its data. This includes utilizing checksums, data validation procedures, and real-time monitoring systems to identify and rectify discrepancies or fraudulent activities. By regularly auditing data and implementing controls to prevent unauthorized changes, the company ensures that all information remains accurate and reliable. These practices support informed decision-making, ensure compliance with regulatory standards, and maintain the trust of stakeholders by preventing data manipulation that could compromise financial reporting or operational efficiency.

4.7 Cloud Security:

NAP secures its cloud-based services in accordance with industry best practices. This includes utilizing encryption to protect data both at rest and in transit, enforcing strict access controls, and ensuring that third-party cloud service providers adhere to the company's security requirements. Regular security audits of cloud services are conducted to ensure continued compliance with security standards and mitigate potential risks. By safeguarding data stored in the cloud, NAP ensures the confidentiality, integrity, and availability of its information in a secure and compliant environment.

4.8 Business Continuity and Disaster Recovery:

NAP has established comprehensive business continuity and disaster recovery plans to ensure the resilience of its operations. These plans outline the necessary steps to restore data, systems, and processes in the event of a natural disaster, cyber-attack, or system failure. The company conducts regular tests and simulations to ensure that recovery procedures are effective and that downtime and data loss are minimized. By having robust recovery plans in place, NAP can quickly recover from disruptions and maintain business operations with minimal impact.

4.9 Access Control Management:

NAP implements strict access control measures to protect sensitive data and systems. Role-based access control (RBAC) ensures that employees are granted access only to the data and systems they need for their specific roles. Access rights are reviewed regularly to ensure that unnecessary permissions are revoked, and that security policies remain in place. By enforcing strong access controls, NAP minimizes the risk of unauthorized access and ensures that only authorized personnel can interact with sensitive company information, reducing the risk of data breaches.

4.10 Secure Software Development Lifecycle (SDLC):

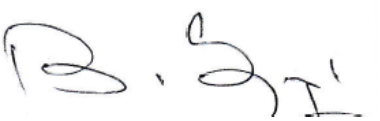
NAP integrates security measures throughout its software development lifecycle (SDLC). From planning and requirements gathering to coding, testing, and deployment, security controls are incorporated at every phase of development. Code is regularly reviewed for vulnerabilities, and secure coding practices are followed to mitigate risks. This proactive approach to security ensures that software applications are designed and implemented with strong safeguards, minimizing the potential for cyber-attacks and ensuring that the company's digital assets are protected from vulnerabilities throughout their lifecycle.

5. Quantitative Objectives

Objective	Qualitative Objective	Unit of Measure	Target Value
1. Minimize security incidents	Reduce unauthorized data access	Incidents per quarter	< 2 incidents
2. Employee training Completion	Ensure information security awareness	% employees trained	Maintaining 100% Organized
3. Response time for incidents	Quickly respond to security breaches	Hours per incident	< 24 hours
4. Data recovery readiness	Ensure robust data backup and recovery	Successful tests/month	Maintaining 100% Organized
5. Third-party compliance adherence	Ensure secure third-party handling	Compliance rate	Maintaining 100% Organized

6. Distribution

This policy will be distributed to all employees, contractors, and relevant stakeholders during on boarding and whenever significant updates are made. The distribution ensures that all individuals involved in the organization are aware of the policy's contents and their responsibilities. Employees and contractors are required to acknowledge their understanding of the policy and confirm their commitment to adhering to its guidelines. This acknowledgment is a key part of fostering a culture of compliance and security within NAP , ensuring that everyone understands their role in maintaining the integrity and security of the company's operations.

		
Prepared by	**Checked By**	**Approved By**

7. Annual Review

The Information Security Policy will undergo an annual review conducted by the Information Security Officer (ISO), in collaboration with department heads and the IT department. This review will assess the policy's relevance, ensuring it aligns with emerging threats, regulatory changes, and evolving business needs. The review process aims to identify any gaps or areas for improvement in the current policy. Any necessary amendments will be made and communicated promptly to all relevant employees, contractors, and stakeholders to ensure on-going compliance and a proactive approach to safeguarding company data and systems against potential security risks.

8. Conclusion

At NAP, we are committed to maintaining a secure and compliant environment for handling both our information and that of our stakeholders. By adhering to this Information Security Policy, we strengthen our dedication to ethical business practices, regulatory compliance, and sustainable growth. This policy is integral to our on-going efforts to safeguard sensitive data, ensure privacy, and mitigate risks. We encourage all employees, contractors, and partners to actively engage in our mission to protect information integrity, support a secure operating environment, and contribute to our Environmental, Social, and Governance (ESG) objectives for long-term success.

25. CORRUPTION AND BRIBERY REPORTING POLICY

NAP/ESG/PY/25

1. Introduction

NAP, a leading manufacturer of plastic injection moulded components and assemblies, is committed to maintaining a high standard of integrity, transparency, and accountability in all its operations. As part of our commitment to Ethical Standards Governance (ESG), we have established this Whistleblower Procedure to provide a clear, accessible, and secure mechanism for stakeholders to report instances of corruption, bribery, or other unethical activities within the company. This policy is designed to encourage a culture of transparency while safeguarding those who come forward with concerns. The Whistleblower Procedure provides a structured, secure, and confidential channel for reporting any incidents of corruption, bribery, or unethical behaviour.

2. Scope

This policy applies to all stakeholders, including employees, contractors, suppliers, customers, and business partners, who may have information regarding corruption, bribery, or unethical behaviour within the company. It establishes a clear reporting mechanism, outlines the roles and responsibilities of stakeholders, and ensures the protection of whistle-blowers. The procedure guarantees the confidentiality of the whistle-blower's identity, provides a non-retaliation framework, and offers multiple reporting channels to address concerns. This policy aims to foster a culture of integrity by allowing stakeholders to report misconduct safely and confidentially, ensuring accountability within the organization.

3. Roles and Responsibilities

3.1 Whistle-blowers (Stakeholders)

Whistle-blowers play a critical role in promoting transparency and accountability by reporting incidents or suspicions of corruption, bribery, or unethical behaviour in good faith. They are expected to provide as much detailed information as possible to aid investigations, ensuring that the allegations can be thoroughly examined. Whistle-blowers should cooperate fully with investigations, sharing relevant evidence and responding to inquiries when required.

Their actions help uncover misconduct, protect organizational integrity, and prevent harm to stakeholders. Protections for Whistleblower are essential to encourage reporting without fear of retaliation or retribution.

3.2 Compliance Officer

The Compliance Officer is responsible for overseeing the implementation and effectiveness of the Whistleblower Procedure, ensuring that all reports are handled appropriately. They must maintain confidentiality throughout the process, protecting Whistleblower from retaliation or discrimination. The Compliance Officer is also tasked with investigating reported incidents or concerns, either directly or by assigning investigation teams as needed. By ensuring adherence to legal and ethical standards, they help foster a culture of integrity within the organization. The officer's role is critical in ensuring that Whistleblower reports are taken seriously, investigated thoroughly, and resolved effectively while safeguarding the rights of all parties involved.

3.3 Management

Management is responsible for supporting the whistleblowing process by ensuring that employees and stakeholders are fully aware of the procedure and feel encouraged to report concerns. They must take appropriate corrective actions when reports of corruption, bribery, or unethical behaviour are substantiated, demonstrating a commitment to integrity and accountability. Additionally, management plays a key role in fostering a safe and supportive environment for Whistleblower, ensuring that individuals are protected from retaliation or harm. By setting a positive example and promoting transparency, management helps create a culture where ethical conduct is prioritized and misconduct is addressed promptly and effectively.

3.4 Human Resources Department

The Human Resources (HR) Department plays a vital role in supporting the whistleblowing process by assisting in maintaining the confidentiality of the whistleblower's identity. HR ensures that all reports are handled discreetly to protect the individual's privacy and safety. Additionally, HR is responsible for addressing any complaints related to retaliation or discrimination against Whistleblower, taking immediate action to prevent and correct any unfair treatment. By upholding policies of non-retaliation and providing support to whistleblowers, HR helps create a workplace where individuals feel safe and empowered to report misconduct without fear of negative consequences.

3.5 Investigating Team

The Investigating Team is responsible for thoroughly examining reported cases of misconduct, such as corruption, bribery, or unethical behaviour. Their primary role is to gather all relevant information, assess evidence, and conduct interviews in a fair and impartial manner. The team ensures that investigations are carried out in a timely manner, with due consideration for all parties involved. They must uphold principles of fairness, confidentiality, and objectivity throughout the process, providing accurate findings and recommendations. The team's goal is to resolve reported issues efficiently while maintaining the integrity of the investigation and protecting the rights of whistleblowers and other stakeholders.

4. Corruption and Bribery Reporting Policy

4.1 Confidentiality Guarantee

Whistleblowers are assured that their identity will remain confidential throughout the reporting and investigation process, unless they decide to disclose it themselves. The company will make every reasonable effort to protect the whistleblower's identity to ensure their safety and privacy. Only those with a legitimate need to know will have access to this information. If, in rare circumstances, disclosure is unavoidable, the Whistleblower will be informed in advance. This commitment ensures a secure and trusted environment for reporting misconduct without fear of exposure.

4.2 Non-Retaliation Guarantee

The company guarantees that no retaliatory actions will be taken against any individual who reports misconduct in good faith. This includes protection from termination, demotion, harassment, or any form of adverse treatment. The company's zero-tolerance policy for retaliation ensures that whistleblowers can report concerns safely. Any retaliatory behaviour will be met with disciplinary action, including possible termination. This policy fosters an environment where employees can report issues without fear of negative consequences or reprisal.

4.3 Dedicated Reporting Channels

The company offers multiple reporting channels to ensure whistleblowers can report misconduct confidentially and securely. These include a dedicated internal email address or phone number specifically for receiving reports of misconduct, an independent third-party hotline or platform that guarantees anonymity and confidentiality, and a designated compliance officer responsible for managing all reports. This range of options provides flexibility for whistleblowers, ensuring their concerns can be raised through a preferred method while maintaining the confidentiality and integrity of the reporting process, fostering trust and transparency in the company's commitment to ethical conduct.

4.4 No Requirement for Proof

Whistleblowers are encouraged to report concerns based on reasonable suspicion or belief, without the need to provide direct evidence. Reports made in good faith will be taken seriously and thoroughly investigated, even if concrete proof is not available at the time of reporting. This approach ensures that potential misconduct is addressed appropriately and ethically, fostering a culture where concerns are not dismissed due to lack of immediate evidence. The focus is on safeguarding the integrity of the company, upholding ethical standards, and ensuring that all reports are given due attention, regardless of the availability of proof.

4.5 Protection of Whistleblower Rights

The company is committed to protecting whistleblowers from any form of retaliation, including job loss, demotion, or negative performance reviews. Whistleblowers will not face adverse consequences for reporting misconduct in good faith. Any employee or third party found retaliating against a whistleblowers will be subject to disciplinary action, which may include termination. By safeguarding whistleblowers rights, the company fosters a secure environment where individuals can report unethical behaviour without fear of retribution. This protection ensures that ethical standards are upheld and encourages transparency throughout the organization.

4.6 Investigation Process

Upon receiving a report, the Compliance Officer or designated investigative team will review the allegations promptly and impartially. Investigations will be conducted confidentially and swiftly to ensure fairness and thoroughness. The investigation process will include gathering relevant facts, interviewing witnesses, and analysing any available evidence.

If the report is substantiated, appropriate corrective actions, including legal measures, will be taken. The goal is to resolve the matter effectively while maintaining transparency and upholding ethical standards.

4.7 False Reports

Whistleblowers are expected to report in good faith, based on honest belief and reasonable grounds. False or malicious reports, made with the intent to harm others or disrupt the organization, will be subject to disciplinary action. However, individuals who report misconduct based on a genuine concern, even if the allegations are later found to be unsubstantiated, will be protected from retaliation or penalty. The company values integrity and aims to create a system where reporting misconduct is encouraged and supported.

4.8 Records Retention

All reports of misconduct and related investigation documentation will be securely stored in compliance with legal and company policies. These records will be maintained confidentially to protect sensitive information throughout the process. They will be retained for the required period as per legal and regulatory requirements, ensuring compliance with applicable laws. Access to these records will be restricted to authorized personnel only, ensuring that the process remains transparent, secure, and protected from unauthorized disclosure. This approach upholds the integrity of the reporting process and ensures that Whistleblower information is handled responsibly and in accordance with legal standards.

4.9 Awareness and Training

The company will offer regular training sessions to employees and stakeholders to enhance their understanding of corruption, bribery, and unethical behaviour. This training will focus on identifying red flags, recognizing the impact of misconduct, and understanding the company's Whistleblower policy. Participants will also be educated on how to use the available reporting mechanisms effectively and confidentially. The aim is to ensure that all employees feel empowered to report concerns, understand their rights and responsibilities, and contribute to maintaining a culture of integrity. Ongoing training will reinforce the company's commitment to transparency and ethical conduct.

4.10 Regular Audits and Monitoring

The company will conduct regular audits and monitoring of its operations and reporting mechanisms to ensure compliance with this Corruption and Bribery Reporting Policy. Audits will assess the effectiveness of the reporting channels, investigate trends, and identify potential areas of vulnerability to misconduct. The results of these audits will be reviewed by senior management to ensure corrective actions are implemented where necessary. Continuous monitoring helps to uphold a proactive approach in identifying and addressing misconduct, reinforcing the company's commitment to maintaining a corruption-free and ethical workplace.

5. Quantitative Objectives

Objective	Target	Measurement
Timely Investigation of Reports	90% of reports should be investigated within 10 working days	Number of reports investigated on time vs. total reports
Whistleblower Engagement	Achieve 80% employee awareness of the whistleblowers procedure	Percentage of employees who acknowledge understanding of the procedure
No Retaliation Cases	Zero retaliation cases against whistleblowers	Number of retaliation cases reported during the year
Reports from Stakeholders	Receive 15-20 whistleblowers reports annually	Total number of whistleblowers reports filed annually
Training and Awareness	100% employees to receive annual whistleblowers policy training	Number of employees trained vs. total employees

6. Distribution

The Whistleblower Procedure Policy will be distributed to all employees, contractors, suppliers, and relevant stakeholders using various methods. New hires will receive the policy as part of their on boarding process through the Employee Handbook. Regular email reminders will be sent, and the policy will be posted on the company intranet for easy access. As part of mandatory annual compliance training, all employees will receive training on the policy. External stakeholders, such as contractors and suppliers, will be provided with the policy when starting their relationship with the company and during annual review meetings to ensure ongoing awareness and adherence.

7. Annual Review

The Whistleblower Procedure Policy will undergo an annual review to assess its effectiveness and ensure compliance with legal standards and industry best practices. The review will include evaluating the effectiveness of reporting channels and confidentiality measures. The number of reports, resolution times, and outcomes will be analysed, along with any incidents of retaliation against whistleblowers. False reporting cases will be reviewed, and the procedure will be adjusted to prevent abuse. The policy will also be updated to reflect any changes in relevant laws or internal company structures, ensuring it remains relevant, robust, and aligned with best practices in ethical conduct.

8. Conclusion

NAP is dedicated to fostering a culture of transparency, integrity, and ethical behaviour. The Whistleblower Procedure outlined in this policy ensures that employees, contractors, suppliers, and stakeholders can report corruption, bribery, or unethical conduct without fear of retaliation. With multiple reporting channels, strict confidentiality, and a non-retaliation guarantee, the company demonstrates its commitment to maintaining high ethical standards and a corruption-free environment. This procedure is essential in safeguarding the organization's integrity, protecting stakeholders, and promoting a workplace where ethical conduct is valued and misconduct is addressed promptly and effectively.

26. INFORMATION SECURITY WHISTLEBLOWER PROCEDURE

NAP/ESG/PY/26

1. Introduction

NAP is dedicated to upholding the highest standards of information security, transparency, and accountability. We recognize that protecting sensitive data and maintaining stakeholder trust is critical to our business operations. Aligned with our Environmental, Social, and Governance (ESG) principles, we have established this "Whistleblower Procedure" to provide a secure and confidential channel for stakeholders to report any concerns, violations, or misconduct related to information security. This procedure ensures that all issues are addressed promptly, maintaining the integrity of our operations and safeguarding against potential risks. This procedure ensures that whistleblowers are protected, have access to reliable reporting channels, and can raise concerns without fear of retaliation.

2. Scope

This policy applies to all stakeholders associated with NAP, including employees, contractors, suppliers, customers, third-party service providers, and any individual or entity who may encounter or become aware of potential information security violations within the organization. It covers all concerns related to breaches of data protection, confidentiality, and security protocols, regardless of the source or nature of the violation. The Whistleblower Procedure ensures that all stakeholders, regardless of their relationship with NAP, have a safe and confidential avenue to report such concerns, helping maintain the integrity and security of our operations and data management practices.

3. Roles and Responsibilities

3.1 Whistleblower:

Whistleblowers, including employees, contractors, and external parties, play a crucial role in identifying and reporting potential information security violations or concerns. They are responsible for promptly notifying designated channels, such as a secure reporting platform or direct communication with the Information Security Officer (ISO). Whistleblowers are encouraged to report issues with confidence, knowing that their concerns will be taken seriously and handled confidentially.

They must provide accurate information and cooperate with investigations to help ensure that risks are addressed effectively, ultimately safeguarding the organization's data security and integrity.

3.2 Information Security Officer (ISO):

The Information Security Officer (ISO) is tasked with overseeing the investigation and resolution of all information security concerns reported by whistleblowers. The ISO ensures that reports are processed through proper channels and that the investigation follows established procedures, maintaining confidentiality and integrity throughout. The ISO works closely with relevant stakeholders, including the Internal Audit Team, to assess the severity of issues and determine appropriate corrective actions. Additionally, the ISO is responsible for providing regular updates on the progress of investigations, ensuring compliance with security policies, and fostering a culture of transparency and accountability within the organization.

3.3 Management:

Managers at all levels are responsible for fostering a supportive environment for whistleblowers and ensuring the proper handling of any concerns reported. They must encourage employees and stakeholders to come forward with information security issues, emphasizing the importance of transparency and accountability. Managers play a key role in addressing reported concerns promptly and professionally, ensuring that investigations are carried out effectively. They must also act as role models in upholding security policies and maintaining a culture of trust, ensuring that any actions taken do not deter whistleblowers from reporting future concerns.

3.4 Human Resources (HR):

Human Resources (HR) is responsible for ensuring that whistleblowers are protected from retaliation, discrimination, or any adverse consequences for reporting concerns related to information security. HR plays a crucial role in supporting the whistleblowers throughout the investigation process, providing assistance if needed and ensuring that their rights are upheld. HR works closely with management and the Information Security Officer to ensure that the organization's policies on non-retaliation are enforced and that whistleblowers feel safe and supported. HR also offers guidance on maintaining confidentiality and managing any potential conflicts arising from the reported concerns.

4. Report Information Security Concerns Policy

4.1 Purpose of the Whistleblower Procedure:

The purpose of this Whistleblower Procedure is to provide a secure and confidential process for stakeholders to report any concerns related to information security, including data protection issues, cyber-attacks, unauthorized access, and breaches. The procedure ensures that these reports are addressed promptly and effectively, contributing to the overall protection of sensitive information. By offering a safe channel for reporting, NAP fosters transparency and accountability while safeguarding its operations from potential security threats or violations.

4.2 Confidentiality Guarantee:

NAP guarantees the highest level of confidentiality for all reports made through the Whistleblower Procedure. The identity of the whistleblowers will be protected throughout the process, and it will only be disclosed if the whistleblowers consents or if required by law. This guarantee ensures that individuals can report concerns without fear of exposure or retaliation, fostering an environment where sensitive information can be addressed without compromising the privacy of those involved. The organization is committed to safeguarding whistleblowers identities to encourage timely and honest reporting.

4.3 Non-Retaliation Guarantee:

NAP is committed to protecting whistleblowers from any form of retaliation for reporting information security concerns in good faith. Retaliation, harassment, or discriminatory behaviour against individuals who raise concerns will not be tolerated and will result in disciplinary actions. This guarantee ensures that all stakeholders feel safe when reporting issues, knowing they will not face negative consequences for doing so. The company's commitment to non-retaliation reinforces a culture of transparency, integrity, and accountability, which is essential for maintaining the trust of its employees and external stakeholders.

4.4 Reporting Channels:

NAP provides multiple channels for stakeholders to report information security concerns confidentially. These include a dedicated internal email address (whistleblower@nap.com), a confidential hotline (123-456-789), an external third-party hotline for anonymous reporting, and direct contact with the designated Information Security Officer or Compliance Officer.

These diverse reporting options ensure that stakeholders can choose the most convenient and secure method for them. The availability of multiple channels helps ensure accessibility and provides reassurance that concerns can be raised in a manner that protects the whistleblower's privacy.

4.5 Types of Information Security Concerns:

The Whistleblower Procedure covers a broad range of information security issues, including unauthorized access to systems or data, cyber security vulnerabilities, leaks or breaches of sensitive data, tampering with information, non-compliance with internal security policies, and failure to protect personal data. These concerns may stem from intentional misconduct or accidental lapses in security measures. The procedure ensures that all such issues, regardless of their source or severity, are addressed promptly, thoroughly, and with a focus on protecting both the organization and its stakeholders from potential harm.

4.6 Investigation Process:

Once a report is received, the Information Security Officer (ISO) or an appointed team will investigate the concern promptly and thoroughly, following established protocols. The investigation process is designed to be impartial, thorough, and transparent. The severity and impact of the issue will determine the specific course of action taken, which may include technical assessments, interviews, or reviews of policies and procedures. The organization commits to resolving issues efficiently while maintaining confidentiality and protecting the integrity of the investigative process, ensuring that corrective actions are implemented where necessary.

4.7 Protecting Whistleblower Identity:

Ensuring the protection of the whistleblowers identity is a top priority for NAP. Whether reports are made through internal channels or third-party services, measures will be in place to guarantee anonymity and confidentiality. This may include securing personal details, limiting access to sensitive information, and ensuring that the whistleblowers identity is not revealed during the investigation unless legally required or explicitly authorized. Protecting the whistleblowers identity encourages transparency, reduces the risk of retaliation, and ensures that individuals feel safe when raising valid concerns regarding information security.

4.8 Feedback to the Whistleblower:

The whistleblowers will receive an acknowledgment of their report as soon as it is received, ensuring that they know their concern has been taken seriously. During the investigation process, periodic updates will be provided to inform the whistleblowers about the status of the investigation. Throughout the process, complete confidentiality will be maintained to protect the identity and the integrity of the report. At the conclusion of the investigation, the whistleblowers will be informed of the final outcomes, while ensuring that sensitive information or the identity of those involved is not disclosed.

4.9 Training and Awareness:

NAP will provide Ongoing training to all stakeholders to raise awareness of information security risks and the importance of reporting concerns through the designated channels. Training programs will cover various aspects of information security, including recognizing potential threats such as cyber-attacks and data breaches. Stakeholders will be informed of the available reporting channels, procedures, and their rights as whistleblowers. Awareness programs will be conducted periodically to reinforce the company's commitment to data protection, transparency, and accountability, ensuring that employees and partners are equipped to report any concerns promptly and responsibly.

4.10 Documenting and Tracking Reports:

All whistleblower reports will be carefully documented to maintain a record of the concern, investigation, and resolution status. This documentation will include details of the reported issue, actions taken, and outcomes. The reports will be tracked throughout the investigation process to ensure that follow-up actions are completed in a timely and effective manner. A log will be maintained for internal auditing purposes, allowing the company to monitor trends, evaluate the effectiveness of the procedure, and make continuous improvements. This documentation will also serve to reinforce the transparency and accountability of the reporting process.

5. Quantitative Objectives

Objective	Target	Measurement Method
1. Number of Reports Received	Increase in the number of reports by 10% annually	Number of whistleblower reports tracked via internal systems
2. Investigation Completion Rate	90% of cases resolved within 30 days of report	Monitoring case resolution times and feedback from stakeholders
3. Awareness Training Participation	100% of employees trained annually on the procedure	Attendance tracking and post-training assessments
4. Zero Retaliation Incidents	No instances of retaliation within the year	Investigation into any retaliation claims or complaints
5. Whistleblower Satisfaction Rate	80% positive feedback from whistleblowers on the process	Surveys to assess whistleblower satisfaction with the reporting process

6. Distribution

The Whistleblower Procedure policy will be distributed to all stakeholders, including employees, suppliers, contractors, and third-party providers, to ensure broad awareness and access. Distribution methods include email communication to all employees, posting the policy on the company's internal website and employee portals for easy access, and providing printed copies at key locations within the company. Additionally, the policy will be shared with new employees during on boarding and training sessions to ensure they understand their rights and responsibilities. These measures ensure that all stakeholders are informed of the procedure and know how to report concerns confidentially and safely.

7. Annual Review

The Whistleblower Procedure policy will undergo an annual review to ensure its on-going relevance and effectiveness. The review will consider changes in legal and regulatory requirements, feedback from whistleblowers about the procedure's effectiveness, and trends in the number of reports and lessons learned from incidents. Additionally, the review will assess the success of efforts to prevent retaliation and maintain confidentiality. Any necessary revisions will be made to address identified gaps or improvements. Revised policies will be communicated promptly to all stakeholders to ensure they remain informed and aligned with updated procedures and best practices.

8. Conclusion

NAP is dedicated to fostering a transparent, ethical environment where stakeholders feel confident in reporting information security concerns. This Whistleblower Procedure reinforces our commitment to protecting sensitive data, ensuring compliance with relevant regulations, and addressing potential risks proactively. By offering a safe, confidential channel for reporting, we aim to uphold the integrity of the organization and prevent security violations. This policy ensures that all reports are handled without fear of retaliation, reinforcing our dedication to ethical conduct and safeguarding the interests of both the company and its stakeholders.

27. SUSTAINABLE PROCUREMENT POLICY

NAP/ESG/PY/27

1. Introduction

NAP is committed to responsible procurement practices that prioritize the well-being of people, the environment, and society. As a manufacturer of plastic injection moulded components and assemblies, we integrate Environmental, Social, and Governance (ESG) considerations into our supply chain management processes. This Sustainable Procurement Policy on Labor Practices and Human Rights aims to establish clear guidelines and expectations for both internal stakeholders and suppliers to uphold fair labor practices, protect human rights, and promote social sustainability throughout the procurement process. Therefore, we commit to promoting fair and ethical labor practices, ensuring human rights are respected, and minimizing the environmental impact of our supply chain operations.

2. Scope

This policy applies to all employees, suppliers, contractors, and business partners involved in the procurement of materials, services, and components for NAP. It covers all stages of the procurement process, including supplier selection, contract negotiations, and on-going supplier management and performance evaluation. The policy also extends to our global supply chain, ensuring that all suppliers, regardless of geographic location, meet the standards set forth. To maintain its relevance and effectiveness, the policy will be reviewed annually, considering evolving business, legal, and social conditions, ensuring continuous alignment with best practices and stakeholder expectations.

3. Roles and Responsibilities

3.1 Board of Directors

The Board of Directors provides overall governance and strategic oversight of NAP's Sustainable Procurement Policy. They are responsible for ensuring that procurement practices align with the company's Environmental, Social, and Governance (ESG) objectives. The Board plays a crucial role in setting the vision and direction for sustainable sourcing, ensuring that procurement strategies support long-term business sustainability while upholding ethical standards.

By overseeing the policy's implementation, the Board ensures that all procurement activities contribute to NAP's commitment to responsible business practices and social and environmental responsibility.

3.2 Procurement Department

The Procurement Department is responsible for implementing and monitoring the Sustainable Procurement Policy across NAP's entire supply chain. This includes conducting supplier assessments and audits to evaluate labor practices, human rights, and environmental impacts. The department ensures that suppliers meet the ethical sourcing standards set forth by the policy and provides training to procurement staff on managing supplier relationships, ethical sourcing, and responsible procurement. By actively engaging with suppliers and monitoring compliance, the Procurement Department is central to upholding the company's sustainability and human rights commitments.

3.3 Sustainability Team

The Sustainability Team collaborates with the Procurement Department to integrate Environmental, Social, and Governance (ESG) criteria into procurement decisions. They are responsible for evaluating and reporting on the sustainability performance of suppliers, ensuring that environmental and social standards are met throughout the supply chain. The team conducts regular assessments to monitor the impact of procurement choices on NAP's sustainability goals and works to continuously improve the company's approach to ethical sourcing. By analysing supplier performance, the Sustainability Team helps identify areas for improvement and ensures that sustainability is a key factor in procurement strategies.

3.4 Suppliers

Suppliers are expected to adhere to the labor practices and human rights standards outlined in NAP's Sustainable Procurement Policy. This includes complying with all relevant regulations and demonstrating a commitment to ethical practices in their operations. Suppliers must cooperate with NAP's audits and inspections to verify compliance with the policy's requirements. By ensuring transparency and accountability, suppliers contribute to the overall sustainability and ethical integrity of the supply chain. Suppliers who fail to meet these standards may face corrective actions or be excluded from future business engagements with NAP.

3.5 Human Resources (HR) Department

The Human Resources (HR) Department plays a key role in ensuring that internal employees are trained on labor rights and human rights issues. HR collaborates with the Procurement Department to assess labor practices within the organization and ensures that NAP's employees and suppliers are aware of the company's ethical sourcing standards. HR also supports efforts to raise awareness of these issues across the company, fostering a culture of responsibility and compliance.

4. Sustainable Sourcing, Ethical Labor Practices Policy

4.1 Fair Labor Practices

All suppliers and contractors must adhere to national and international labor standards, ensuring fair wages, reasonable working hours, and safe working conditions. They must prohibit child labor and forced labor, safeguarding workers' rights to fair and equitable treatment. Suppliers are also expected to uphold workers' health and safety provide appropriate protective measures, and foster a non-discriminatory workplace environment. Compliance with labor laws and ethical standards is fundamental in NAP's supply chain, and any violations of these practices will not be tolerated.

4.2 Non-Discrimination

NAP requires all suppliers to implement non-discriminatory practices in employment. This includes providing equal opportunities regardless of race, gender, sexual orientation, religion, disability, or any other protected characteristic. Discrimination in recruitment, compensation, promotion, and training is strictly prohibited. By fostering an inclusive and diverse workforce, NAP aims to ensure fairness and equal treatment for all workers, contributing to a more respectful and equitable work environment. Suppliers must actively work to eliminate any biases or barriers that prevent equal opportunities for all employees.

4.3 Freedom of Association

NAP respects and upholds the right of workers to freely associate, form, and join labor unions, as well as engage in collective bargaining. Suppliers must not retaliate or discriminate against workers for exercising these rights. We believe that fostering open channels for communication between workers and employers improves workplace conditions and leads to better outcomes for all parties. NAP encourages suppliers to support a culture where workers feel safe in expressing their views, and they should be able to do so without fear of punishment or reprisal.

4.4 Health, Safety, and Well-being

Suppliers must provide a safe, healthy, and conducive working environment. This includes proper safety measures, personal protective equipment, and training on workplace hazards. Access to medical services and emergency response plans should be available for all employees. NAP emphasizes the importance of prioritizing worker well-being through both preventive and responsive health practices. Adequate rest breaks, clean facilities, and protection from workplace accidents are essential.

4.5 Fair Compensation

NAP requires suppliers to compensate workers fairly by paying at least the legal minimum wage as per local labor laws. Suppliers are also encouraged to provide living wages that enable workers to meet their basic needs. Overtime work must be paid at a fair rate, and workers should receive benefits, such as healthcare, as per local regulations. Suppliers must ensure that all compensation practices comply with legal standards and reflect NAP's commitment to fair wages. Adequate pay ensures workers' dignity and supports a sustainable, motivated workforce.

4.6 Working Hours

Suppliers must adhere to legal limits on working hours and ensure that workers are not subjected to excessive overtime. Reasonable work hours should be established, with sufficient rest periods, to prevent worker fatigue and overexertion. NAP values the work-life balance of its employees and expects suppliers to ensure their workers have time for rest and personal activities. The policy requires that overtime be voluntary and fairly compensated, in compliance with national laws. Workers must not be coerced into working beyond the agreed hours or suffer penalties for refusing overtime.

4.7 Human Rights

NAP expects all suppliers to uphold internationally recognized human rights standards, including the prohibition of child labor, forced labor, and harassment. All workers must be treated with dignity and respect, with their privacy and confidentiality protected. Suppliers must create a safe and inclusive workplace, free from abuse, intimidation, and exploitation. Workers' rights to freedom of movement, personal choice, and participation in workplace decision-making must be respected. Suppliers are required to actively prevent any violations of human rights and take immediate corrective action if breaches occur.

4.8 Environmental Considerations in Procurement

In addition to labor practices, NAP considers environmental factors when selecting suppliers. We prioritize suppliers who demonstrate a commitment to sustainability, such as resource efficiency, waste reduction, and eco-friendly production methods. By aligning procurement strategies with environmental best practices, NAP seeks to minimize the environmental impact of its supply chain while also promoting long-term sustainability. Suppliers must comply with environmental regulations, reduce their carbon footprint, and employ practices that conserve natural resources. NAP encourages suppliers to continuously improve their environmental performance alongside labor and human rights standards.

4.9 Supplier Engagement and Development

NAP collaborates closely with its suppliers to develop and implement best practices in labor management, human rights, and environmental sustainability. This includes providing training programs, capacity-building initiatives, and forums for knowledge sharing. By fostering continuous improvement and dialogue, NAP aims to enhance supplier performance and ensure compliance with ethical standards. Suppliers are encouraged to innovate and invest in processes that align with NAP's values. NAP will support suppliers with resources and guidance to help them meet these standards, ultimately benefiting workers, communities, and the environment.

4.10 Compliance and Monitoring

NAP conducts regular audits and assessments to ensure suppliers adhere to the established labor practices and human rights standards. These evaluations include onsite inspections, worker interviews, and document reviews to verify compliance. In cases of non-compliance, NAP will work with suppliers to implement corrective actions, such as improved training or operational changes. In extreme cases of repeated violations, NAP may terminate the supplier relationship. This monitoring process helps maintain high standards across the supply chain, ensuring that labor practices, safety, and human rights are consistently upheld.

5. Quantitative Objectives

Description	Unit of Measure	Target Value
Percentage of suppliers compliant with fair labor practices	Percentage (%)	Maintaining 100% Organized
Reduction in the number of supplier non-compliance incidents	Number of incidents	Reduce incidents by 10% annually
Percentage of suppliers with implemented environmental practices in procurement	Percentage (%)	80% of suppliers by end of year
Number of suppliers trained on labor rights and human rights practices	Number of suppliers	90% of suppliers by end of year
Supplier satisfaction with sustainability performance monitoring	Percentage (%)	Achieve 85% satisfaction in surveys

6. Distribution

This policy will be distributed to all employees within the Procurement and Sustainability departments to ensure alignment with NAP's standards and practices. It will also be shared with current and potential suppliers as part of the onboarding process, ensuring they understand the expectations regarding labor practices, human rights, and sustainability. External auditors and compliance officers will receive the policy to facilitate proper monitoring and verification of supplier compliance. Additionally, the policy will be made accessible through company communication channels, including internal portals and websites, to ensure transparency and broad awareness across the organization and stakeholders.

7. Annual Review

The policy will undergo an annual review by the Procurement and Sustainability teams to evaluate its effectiveness, relevance, and alignment with industry best practices. The review will focus on supplier compliance with labor practices and human rights, the impact of environmental considerations in procurement, the success of supplier capacity-building initiatives, audit outcomes, and any changes in labor-related legislation or international standards. Based on these findings, the policy will be updated to ensure continuous improvement and alignment with evolving social, environmental, and business expectations. This process ensures that NAP remains committed to ethical and sustainable practices.

8. Conclusion

NAP's commitment to sustainable procurement is centred on fostering ethical labor practices, ensuring the protection of human rights, and integrating environmental considerations into all aspects of procurement management. We recognize that our supply chain decisions have a significant impact on society and the environment, and we are dedicated to working with suppliers who share our commitment to ESG principles. Through continuous monitoring, collaboration, and training, we aim to uphold our responsibility to the people and communities within our supply chain while contributing to global sustainability goals. By adhering to this policy, we aim to create a more sustainable, equitable, and ethical procurement system that benefits all stakeholders—employees, suppliers, customers, and society at large.

28. SUPPLIER SUSTAINABILITY CODE OF CONDUCT POLICY

NAP/ESG/PY/28

1. Introduction

NAP is dedicated to promoting environmental, social, and governance (ESG) values throughout our operations. Our Supplier Sustainability Code of Conduct sets forth the standards and principles we expect our suppliers to uphold, ensuring alignment with our ESG objectives. By fostering shared responsibility for ethical and sustainable business practices, we aim to drive long-term growth that benefits both our organization and the communities and environments we engage with. This Code underscores our commitment to responsible sourcing and partnership, ensuring that our suppliers play a vital role in advancing our sustainability goals.

2. Scope

This policy applies to all suppliers, contractors, subcontractors, and third-party vendors doing business with NAP. It covers critical areas including labor and human rights, health and safety, environmental impact, ethical business practices, and monitoring and reporting requirements. All suppliers are expected to comply with these standards in their operations and to actively work towards continuous improvement. By aligning with this Code of Conduct, suppliers contribute to maintaining a responsible and sustainable supply chain, supporting NAP's commitment to ethical practices and environmental stewardship while ensuring compliance with legal and regulatory requirements.

3. Roles and Responsibilities

3.1 NAP Procurement Team:

The Procurement Team is responsible for distributing and communicating the Supplier Sustainability Code of Conduct to all suppliers. They must ensure that each supplier acknowledges and signs the Code before any business engagement. Additionally, the team will monitor supplier compliance through regular audits and assessments to ensure on-going adherence to the standards outlined in the Code. Any issues identified during audits will be addressed promptly, with corrective actions initiated to maintain compliance and uphold NAP's sustainability goals. The team plays a crucial role in maintaining a responsible and transparent supply chain.

3.2 Suppliers:

Suppliers are expected to fully adhere to all provisions outlined in the Supplier Sustainability Code of Conduct, including labor standards, environmental impact, and ethical business practices. They must provide necessary documentation and evidence to demonstrate compliance with the Code's requirements. In the event of any breaches, suppliers are obligated to report these issues to NAP promptly. Suppliers are also encouraged to engage in continuous improvement practices, working proactively to address any gaps in compliance. Adherence to the Code is fundamental to maintaining a mutually beneficial, sustainable business relationship with NAP.

3.3 Compliance and Sustainability Team:

The Compliance and Sustainability Team is responsible for reviewing and updating the Supplier Sustainability Code of Conduct annually, ensuring that it remains relevant and aligned with industry best practices and regulatory changes. This team provides support and guidance to suppliers, helping them understand and implement the Code's requirements. They also conduct regular audits and assessments to verify supplier compliance. In cases of non-compliance, the team will work with suppliers to implement corrective actions. Their role is crucial in driving continuous improvement and ensuring that the Code is consistently followed across NAP's supply chain.

3.4 Quality Control Team:

The Quality Control Team inspects supplier facilities and processes to ensure they meet the quality and sustainability standards set by NAP. They are responsible for assessing supplier adherence to product quality, environmental impact, and ethical practices. Any non-compliance or deviations identified during inspections are reported to the Procurement and Sustainability teams, which will take necessary corrective actions. The team’s role ensures that suppliers not only meet product specifications but also uphold the sustainability and ethical standards crucial to NAP’s values and long-term success.

3.5 Human Resources Team (NAP):

The Human Resources Team at NAP is responsible for training internal teams to understand and apply the supplier standards in all engagements. They ensure that internal staffs are equipped with the knowledge to assess supplier practices related to labor rights, safety, and ethical standards. HR also works to ensure that suppliers provide safe working conditions and respect workers' rights, aligning with NAP's commitment to human dignity. The HR team plays a key role in supporting compliance with labor laws and maintaining a fair, safe, and respectful work environment throughout the supply chain.

4. Supplier Sustainability Code Of Conduct Policy

4.1 Legal and Regulatory Compliance:

Suppliers must adhere to all relevant local, national, and international laws and regulations governing their operations. This includes compliance with labor laws, environmental regulations, and any industry-specific requirements. Suppliers are responsible for staying up-to-date with legal changes and ensuring that their practices meet or exceed regulatory standards. Non-compliance with applicable laws can lead to corrective actions, including the termination of the supplier relationship. By complying with these legal requirements, suppliers contribute to the overall integrity and sustainability of NAP's supply chain while mitigating legal risks and ensuring responsible business practices.

4.2 Labor and Human Rights:

Suppliers must uphold fair labor practices and respect human rights by prohibiting forced labor, child labor, and discrimination in all forms. They must comply with applicable labor laws concerning wages, benefits, working hours, and working conditions. Suppliers should treat all workers with dignity and fairness, ensuring equal opportunity and respect for individual rights. This includes providing workers with safe, non-exploitative, and non-discriminatory working environments. Compliance with labor and human rights laws is essential for fostering a sustainable and ethical supply chain that reflects NAP's core values of fairness, dignity, and respect for all employees.

4.3 Health and Safety:

Suppliers are required to provide a safe and healthy working environment that complies with relevant occupational health and safety laws. This includes implementing safety procedures, conducting regular risk assessments, providing necessary protective equipment, and training employees on safe work practices. Suppliers must ensure that workers are informed about potential hazards and have access to health services if needed. By prioritizing health and safety, suppliers protect the well-being of their workforce, reduce the risk of workplace accidents, and align with NAP's commitment to creating a safe and sustainable supply chain for all stakeholders.

4.4 Environmental Stewardship:

Suppliers must actively work to minimize their environmental impact by reducing waste, emissions, and water consumption. They should adopt practices that promote sustainability, such as recycling, using eco-friendly materials, and reducing their carbon footprint. Suppliers are encouraged to implement energy-efficient measures and consider renewable energy options where feasible. By incorporating these practices into their operations, suppliers contribute to NAP's broader environmental goals, ensuring that the entire supply chain operates in a manner that is environmentally responsible and aligned with sustainable development objectives.

4.5 Ethical Business Practices:

Suppliers must conduct their business with integrity, transparency, and accountability, fostering trust and ethical behaviour in all dealings. Practices such as bribery, corruption, and fraud are strictly prohibited. Suppliers must uphold high ethical standards in their relationships with customers, employees, and other business partners. Additionally, they are required to protect confidential and proprietary information, ensuring that data is handled responsibly. Ethical business practices are fundamental to building long-term, transparent relationships within NAP's supply chain, and ensuring that all business activities are conducted in a manner that promotes fairness and legal compliance.

4.6 Resource Efficiency:

Suppliers should adopt responsible practices to use resources efficiently, promoting energy conservation, water usage reduction, and waste minimization. This includes utilizing energy-efficient technologies, reducing material waste, and improving manufacturing processes to lower resource consumption. Suppliers are encouraged to explore renewable energy sources and adopt circular economy principles where feasible.

By optimizing resource use, suppliers contribute to NAP's sustainability goals while reducing operational costs and minimizing their environmental footprint. Resource efficiency is essential in fostering long-term economic and environmental sustainability across the supply chain.

4.7 Sustainable Sourcing:

Suppliers are expected to source raw materials in a socially and environmentally responsible manner. This includes ensuring transparency in the supply chain by tracing the origin of materials, avoiding conflict minerals, and supporting ethical sourcing practices. Suppliers should prioritize sourcing from certified sustainable suppliers and engage in fair trade practices. By adopting responsible sourcing practices, suppliers help NAP avoid supporting harmful industries or practices while fostering environmental conservation and social responsibility. This commitment to sustainable sourcing ensures that the materials used in NAP's products meet the highest ethical and environmental standards.

4.8 Diversity and Inclusion:

Suppliers are expected to foster a diverse and inclusive workplace by promoting equitable hiring practices and supporting underrepresented groups. This includes ensuring equal opportunities for all workers, regardless of gender, race, ethnicity, or other protected characteristics. Suppliers should create an environment that values diversity and inclusion, providing equal access to training, advancement, and compensation. By embracing diversity, suppliers contribute to NAP's commitment to creating an inclusive and equitable supply chain where every worker is treated with fairness and respect, enhancing the overall productivity and morale of the workforce.

4.9 Fair Competition:

Suppliers must engage in fair competition, abiding by antitrust laws and avoiding anti-competitive practices such as price-fixing, market-sharing, or bid-rigging. Suppliers should operate in a transparent and ethical manner, competing based on merit and product quality rather than manipulation or unfair advantage. By adhering to fair competition principles, suppliers help foster a marketplace that encourages innovation, fair pricing, and equitable opportunities for all businesses. NAP expects its suppliers to maintain high ethical standards and respect for competition laws, ensuring that their practices contribute to a healthy, competitive, and sustainable business environment.

4.10 Continuous Improvement and Reporting:

Suppliers are encouraged to continuously improve their sustainability performance by setting measurable goals and tracking progress in areas such as labor practices, environmental impact, and ethical business behaviour. Suppliers should report their achievements and challenges annually, providing transparent documentation that reflects their efforts to meet ESG targets. Regular reporting ensures accountability and allows for the identification of opportunities for improvement. By committing to continuous improvement and transparent reporting, suppliers help NAP track progress toward its sustainability objectives and identify areas where further action is needed to ensure long-term success.

5. Quantitative Objectives

Objective	Target	Time Frame
Reduction in CO2 emissions	15% reduction from previous year	Annually
Increase in recycled material usage	Minimum 20% of total materials used	Annually
Reduction in workplace incidents	Less than 2 incidents per year	Annually
Energy consumption reduction	10% reduction from previous year	Annually
Implementation of a waste recycling program	100% of suppliers by end of 2025	By 2025

6. Distribution

The Supplier Sustainability Code of Conduct will be distributed to all suppliers, contractors, and third-party vendors at the start of any business relationship. Each supplier must acknowledge and sign the Code upon initial engagement to confirm their commitment to the outlined standards. To ensure ongoing accessibility, the policy will be made available on NAP's supplier portal, where it can be easily accessed by both current and potential suppliers. This ensures transparency, consistent adherence to ethical and sustainability standards, and provides suppliers with a clear understanding of their responsibilities throughout the duration of the partnership.

7. Annual Review

NAP's Compliance and Sustainability Team will conduct an annual review of the Supplier Sustainability Code of Conduct to assess its effectiveness and relevance. This process will involve evaluating audit results, analyzing supplier feedback, and identifying areas for improvement.

If necessary, revisions will be made to enhance the Code's impact and align it with evolving industry best practices and regulatory requirements. Any updates will be communicated to suppliers, who will be required to comply with the revised standards. This ensures that the Code remains a dynamic tool for promoting continuous improvement and sustainability across the supply chain.

8. Conclusion

The Supplier Sustainability Code of Conduct is a testament to NAP's commitment to building a sustainable and ethical supply chain. By adhering to this code, suppliers are playing a vital role in fostering a more sustainable future. NAP believes that, together with our suppliers, we can reduce our environmental footprint, ensure fair and safe working conditions, and uphold the highest standards of integrity and transparency. This policy aims to build a lasting relationship with our suppliers based on shared values and mutual respect. Compliance with this code is not just a requirement but an opportunity for our suppliers to demonstrate leadership in social and environmental responsibility.

29. ANTI-HARASSMENT POLICY

NAP/ESG/PY/29

1. Introduction

At NAP, we are committed to maintaining a workplace free from harassment, where all employees are treated with respect and dignity. Harassment of any kind undermines workplace morale, disrupts productivity, and creates an environment of distrust. As part of our commitment to ethical, sustainable, and responsible operations, we uphold high standards of behavior and strictly prohibit all forms of harassment, whether verbal, physical, or psychological. This policy is integral to our Environmental, Social, and Governance (ESG) framework and reflects our dedication to fostering an inclusive, safe, and supportive work environment for all employees.

2. Scope

This Anti-Harassment Policy applies to all employees, contractors, visitors, and stakeholders associated with NAP. It addresses any form of harassment that may occur in the workplace or any environment where company business is conducted, including company premises, off-site locations, company-related events, and digital or virtual spaces. Harassment is prohibited regardless of the setting or relationship between the involved parties. This policy aims to ensure that all interactions reflect NAP's commitment to respect, safety, and inclusion, protecting everyone connected with the company from harassment, discrimination, or inappropriate conduct.

3. Roles and Responsibilities

3.1 Management

Management is responsible for leading by example and actively promoting a harassment-free workplace. They must ensure all employees are fully aware of and understand the company's anti-harassment policy, emphasizing its importance in maintaining a respectful work environment. When harassment complaints arise, management must take immediate, appropriate action, ensuring that complaints are addressed promptly and fairly. By creating a culture of accountability, management helps to foster a workplace that prioritizes respect, trust, and productivity, reinforcing NAP's commitment to ethical, inclusive operations in line with its ESG standards.

3.2 Human Resources (HR)

Human Resources are tasked with conducting awareness sessions and training programs for all employees, ensuring they understand the company's anti-harassment policy and their role in maintaining a respectful workplace. HR handles harassment complaints with sensitivity, confidentiality, and urgency, providing a safe channel for employees to report incidents. Records of all reported cases, including investigations and actions taken, are maintained for accountability and follow-up. HR works closely with management and the Harassment Prevention Committee to support affected employees and ensure that harassment issues are dealt with fairly and effectively, upholding a safe and respectful environment.

3.3 Employees

Employees are expected to fully comply with NAP's anti-harassment policy, creating a work environment based on mutual respect. They must report any harassment incidents promptly, following established channels to ensure swift resolution. By participating in training programs, employees are equipped with the knowledge to recognize and prevent harassment in the workplace. Furthermore, all employees are encouraged to actively promote a respectful workplace culture, embodying the values of inclusion and respect. Their active participation in upholding the policy contributes to the overall success of the company's harassment-free initiative and strengthens the organizational culture.

3.4 Harassment Prevention Committee

The Harassment Prevention Committee is responsible for reviewing and investigating reported harassment incidents, ensuring that each case is treated seriously and impartially. The committee offers support to victims, ensuring they feel heard and protected throughout the process. They also ensure that appropriate actions are taken against offenders, maintaining accountability and a culture of zero tolerance for harassment. Additionally, the committee continuously monitors the workplace for any signs of harassment, regularly evaluating the effectiveness of the policy and recommending updates as necessary to adapt to emerging challenges or issues, ensuring the ongoing protection of employees.

4. Anti-Harassment Policy

4.1 Definition of Harassment

Harassment refers to any unwelcome verbal, visual, or physical behavior that creates an intimidating, hostile, or offensive work environment. This can include, but is not limited to, sexual, racial, ethnic, religious, or personal harassment. Harassment negatively impacts employee well-being and can disrupt workplace productivity and

morale. It is essential that all employees understand that harassment, in any form, is prohibited and that NAP is committed to providing a safe and respectful environment for everyone. Any form of harassment violates company policy and will not be tolerated under any circumstances.

4.2 Forms of Harassment

Harassment at NAP can appear in various forms, each detrimental to a respectful workplace. Sexual harassment includes unwelcome advances, comments, or behaviors of a sexual nature. Verbal harassment involves offensive language, jokes, or slurs that belittle individuals. Physical harassment refers to unwanted physical contact, such as touching or obstructing movements. Visual harassment includes displaying offensive or derogatory materials, such as inappropriate posters or gestures. Psychological harassment involves repeated and unreasonable actions that negatively impact an individual's mental well-being. Each form will be addressed promptly through the reporting and investigation processes defined in this policy, ensuring a safe and inclusive environment.

4.3 Reporting Procedure

Employees can report harassment through multiple channels: directly to HR, to a supervisor, or via an anonymous reporting mechanism. The company ensures that all complaints are treated with the utmost confidentiality and respect for the privacy of all individuals involved. Employees should feel safe to report incidents without fear of judgment or reprisal. Reports will be taken seriously and handled promptly to investigate and resolve issues. NAP encourages employees to report harassment early to prevent escalation and maintain a supportive work environment.

4.4 Investigation Process

HR and the Harassment Prevention Committee will conduct a thorough and impartial investigation into any harassment complaints within a specified timeline. Both the complainant and the respondent will be given an opportunity to present their side of the story. Investigations will be based on factual evidence, including witness testimonies, and the focus will be on ensuring fairness and transparency.

If the investigation reveals that harassment has occurred, appropriate disciplinary actions will be taken. The process will be handled confidentially to protect the privacy and integrity of all involved parties.

4.5 Disciplinary Actions

Disciplinary actions for harassment will depend on the severity of the offense and in accordance with company policies and labor laws. Consequences may range from verbal warnings to suspension or even termination, depending on the nature and frequency of the harassment. In all cases, the disciplinary process will be fair, consistent, and based on the facts uncovered during the investigation. NAP is committed to ensuring that its workplace remains free of harassment, and any violations of the policy will be met with appropriate actions to maintain a respectful environment.

4.6 Protection from Retaliation

NAP strictly prohibits any form of retaliation against employees who report harassment or participate in investigations. Retaliation may include, but is not limited to, bullying, exclusion, demotion, or adverse job actions. Any employee found to be retaliating against someone who has made a report or cooperated in an investigation will be subject to disciplinary action. The company encourages employees to come forward with any harassment concerns, knowing that their rights to report issues without fear of retaliation will be protected, fostering a culture of trust and accountability.

4.7 Training and Awareness

NAP will conduct regular training sessions on harassment prevention, reporting procedures, and bystander intervention. These sessions are mandatory for all employees and will ensure that everyone understands the types of harassment, the reporting process, and how to intervene as responsible bystanders. Training will be designed to raise awareness and provide tools to prevent harassment in the workplace. Employees will be encouraged to recognize inappropriate behaviors, take action when necessary, and contribute to creating an inclusive, respectful work environment. The company believes that proactive education is key to maintaining a harassment-free workplace.

4.8 Supports for Victims

NAP is committed to providing support for employees who are victims of harassment. This includes access to counseling services, mental health resources, and employee assistance programs. The company ensures that victims are supported throughout the process, offering a safe environment to express their concerns and seek guidance.

The goal is to help employees recover from any emotional or psychological impact caused by harassment. Victims of harassment will also be informed of their rights and available resources, empowering them to make decisions that are best for their well-being and professional growth.

4.9 Responsibilities of Bystanders

Employees are encouraged to take an active role in preventing harassment by speaking out against inappropriate behavior when they witness it. Bystanders are responsible for supporting colleagues and reporting harassment if it occurs. This creates a collective responsibility to maintain a safe and respectful work environment for all. Bystanders should not ignore harassment but instead intervene when possible or report the incident through appropriate channels. By fostering a culture of accountability, NAP ensures that everyone plays a role in upholding the company's anti-harassment policy.

4.10 Policy Enforcement

The Anti-Harassment Policy will be strictly enforced to ensure a safe and respectful workplace for all employees. Every individual is expected to comply with the policy's terms and contribute to a work environment free from harassment. Any employee found violating the policy will face appropriate disciplinary actions, which may include verbal warnings, suspension, or termination, depending on the severity of the offense. NAP is committed to maintaining a culture of respect, accountability, and fairness, where all employees are protected from harassment. This policy ensures that everyone can work in a professional, inclusive, and supportive environment.

5. Quantitative Objectives

Objective	Target	Frequency	Responsible Department
Reduction in reported harassment incidents	20% decrease	Annually	Human Resources
Employee participation in training	100%	Annually	Human Resources
Timely resolution of complaints	Within 30 days	Ongoing	Harassment Prevention Committee
Policy awareness assessment	95% awareness	Quarterly	HR & Training
Satisfaction score in workplace environment surveys	80% positive	Semi-Annually	HR & Compliance

6. Distribution

The Anti-Harassment Policy will be distributed to all employees during the onboarding process to ensure they understand their responsibilities from the outset. It will also be made readily available on the company's internal portal for easy access at any time. The policy will be presented during annual refresher training sessions, reinforcing its importance and ensuring ongoing awareness. Additionally, a copy of the policy will be included in the employee handbook, providing employees with a comprehensive reference. This multi-channel approach ensures that all employees are informed, educated, and reminded of the company's commitment to a harassment-free workplace.

7. Annual Review

The Anti-Harassment Policy will undergo an annual review to evaluate its effectiveness and ensure it aligns with evolving best practices, legal standards, and ESG principles. The HR department, in collaboration with the Harassment Prevention Committee and senior management, will lead this review process. The objective is to identify any gaps, update procedures as necessary, and adapt the policy to meet emerging workplace needs and legal requirements. Any changes or updates to the policy will be communicated to all employees to ensure continued compliance and reinforce the company's commitment to maintaining a respectful and safe work environment.

8. Conclusion

NAP is committed to creating a workplace where every employee feels safe, respected, and valued. This Anti-Harassment Policy reflects our dedication to ethical conduct, adherence to ESG principles, and fostering a culture of mutual respect. We rely on the cooperation of all employees to uphold these standards and ensure a harassment-free, inclusive environment. By following the policy and actively engaging in maintaining a respectful workplace, we can collectively contribute to a positive and productive work culture where everyone has the opportunity to thrive and succeed. Together, we ensure a supportive and professional atmosphere for all.

30. NON-DISCRIMINATION POLICY

NAP/ESG/PY/30

1. Introduction

NAP is dedicated to fostering an inclusive, respectful, and supportive work environment that values diversity and ensures equal opportunity for all. Our Non-Discrimination Policy demonstrates our commitment to ethical business practices and aligns with our Environmental, Social, and Governance (ESG) principles. The policy applies to all employees, contractors, vendors, and stakeholders, ensuring that discrimination based on race, gender, sexual orientation, religion, disability, or any other protected characteristic is strictly prohibited. By promoting fairness and respect in all interactions, we aim to create a workplace where every individual can thrive, contribute, and succeed

2. Scope

This Non-Discrimination Policy applies to all employees, contractors, and associates of NAP. It covers every aspect of employment, including recruitment, hiring, training, promotions, compensation, benefits, and termination. The policy strictly prohibits discrimination based on race, gender, age, religion, disability, marital status, sexual orientation, national origin, or any other characteristic protected by local, national, or international law. NAP is committed to ensuring that all decisions regarding employment and workplace treatment are based solely on qualifications, performance, and merit, providing equal opportunities to all individuals, and maintaining a fair and inclusive work environment.

3. Roles and Responsibilities

3.1 Human Resources (HR) Department:

The HR Department is responsible for ensuring the effective implementation of the Non-Discrimination Policy across the organization. This includes conducting regular training sessions to raise awareness and educate employees on their rights and responsibilities. HR handles investigations into any discrimination complaints, ensuring confidentiality and fairness in the process. Additionally, HR oversees the policy's annual review to assess its effectiveness and alignment with evolving legal and best practices. By providing support and guidance, HR plays a key role in fostering an inclusive work environment and ensuring compliance with the company's non-discrimination standards.

3.2 Managers and Supervisors:

Managers and supervisors are responsible for maintaining a discrimination-free workplace by modeling inclusive behavior and promoting respect among team members. They handle any discrimination-related complaints promptly and appropriately, ensuring that all issues are addressed in a fair and timely manner. These leaders are also expected to support and promote diverse and inclusive teams, encouraging an environment where all employees feel valued and empowered. By fostering open communication and setting the standard for respectful conduct, managers and supervisors are crucial in upholding the company's commitment to a non-discriminatory workplace.

3.3 Employees:

Employees are expected to adhere to NAP's Non-Discrimination Policy by treating all colleagues with respect and dignity, regardless of their race, gender, sexual orientation, religion, or other protected characteristics. They are responsible for reporting any discrimination-related issues to the appropriate channels, such as HR or their manager, to ensure timely resolution. Employees must actively participate in fostering an inclusive, fair, and respectful work environment. By respecting one another's differences and promoting diversity, employees help create a workplace where everyone has an equal opportunity to succeed and contribute.

3.4 Compliance Officer:

The Compliance Officer monitors adherence to the Non-Discrimination Policy and ensures that all practices within the company align with legal and regulatory requirements. This role includes conducting regular audits, reviewing complaints, and preparing detailed compliance reports for senior management. The Compliance Officer ensures that corrective actions are taken in cases of policy violations and works closely with HR to promote ongoing adherence. By tracking compliance and reporting on any trends or gaps, the Compliance Officer helps safeguard the integrity of the policy and supports a workplace free of discrimination.

3.5 Executive Management:

Executive management is responsible for providing company-wide support and allocating resources necessary for the successful implementation of the Non-Discrimination Policy. This includes ensuring that the policy is communicated clearly, integrated into all business practices, and backed by sufficient training and support systems. Senior leadership must set the tone at the top by demonstrating a commitment to diversity and inclusion, ensuring that the policy is actively promoted and adhered to across all levels of the organization.

By fostering a culture of inclusion, executive management ensures that the non-discrimination policy is a central value at NAP.

4. Non-Discrimination Policy

4.1 Equal Opportunity:

NAP is committed to ensuring that all employment practices, including recruitment, promotions, and terminations, provide equal opportunity for everyone, regardless of race, gender, age, religion, disability, sexual orientation, or any other protected characteristic. This policy ensures that no employee or candidate is discriminated against or treated unfairly based on these attributes. By promoting fairness in all aspects of employment, the company fosters a diverse, inclusive workforce where merit, skills, and qualifications determine opportunities for success, ensuring that all individuals have an equal chance to thrive and contribute.

4.2 Inclusive Hiring:

NAP adopts fair and inclusive hiring practices to ensure that recruitment, selection, and promotion processes are free from bias and discrimination. We actively promote diversity by considering candidates from a wide range of backgrounds, ensuring that opportunities are available to all qualified individuals regardless of race, gender, age, or other protected characteristics. Our recruitment strategies focus on creating a fair and impartial process that values diversity and ensures equal consideration for all applicants. This approach helps build a workforce that reflects the diverse communities in which we operate.

4.3 Training and Development:

NAP provides equal access to training and development opportunities for all employees, regardless of background or protected characteristics. We are committed to supporting career growth through a range of programs designed to enhance employees' skills, leadership potential, and professional development. Our training initiatives are designed to be inclusive, helping all employees, regardless of their demographic, gain the tools and knowledge necessary to advance in their careers. This commitment to equal development ensures that every employee has the opportunity to succeed and progress within the company.

4.4 Compensation and Benefits:

At NAP, compensation and benefits are determined based on job performance, role requirements, and market standards, ensuring fairness and equity across all levels of the organization. Pay and benefits decisions are free from bias or discrimination based on gender, race, age, or other protected characteristics. We are committed to providing equal pay for equal work, ensuring that employees are compensated fairly for their contributions. Our goal is to create an equitable work environment where all employees feel valued and are rewarded for their skills, experience, and performance.

4.5 Workplace Behavior:

NAP fosters a culture of mutual respect and inclusivity, where discriminatory behavior, including verbal or non-verbal actions, is not tolerated. We believe that every employee has the right to work in an environment free from discrimination, harassment, and disrespect. All employees are expected to adhere to the company's values and treat their colleagues with dignity and respect. Discriminatory or exclusionary behavior, whether intentional or unintentional, is addressed promptly and effectively to maintain a harmonious and supportive work environment for all individuals.

4.6 Harassment-Free Workplace:

NAP maintains a zero-tolerance policy toward harassment, bullying, or any form of mistreatment in the workplace. We are committed to providing a safe and supportive environment where all employees can work free from intimidation or fear of harassment. Any claims of harassment are thoroughly investigated in a fair, impartial, and confidential manner, ensuring that all parties involved are treated with respect. Our goal is to swiftly address any allegations and take appropriate actions to prevent future occurrences, ensuring that all employees can work in an atmosphere of mutual respect.

4.7 Flexible Workplace:

NAP is committed to providing reasonable accommodations to employees with disabilities to ensure they have the support they need to succeed in the workplace. This may include modifications to the physical work environment, adjustments to work schedules, or the provision of assistive technologies. Our goal is to create a supportive and accessible environment where all employees, regardless of their abilities, can perform their job effectively. By fostering flexibility, we demonstrate our commitment to inclusivity and ensure that every employee has the opportunity to contribute to the organization's success.

4.8 Respect and Civility:

At NAP, we promote a culture of respect and civility, where employees value different perspectives and work collaboratively. We believe that diverse opinions and approaches enhance creativity, problem-solving, and overall success. Employees are encouraged to engage in open, respectful dialogue and to listen to one another, creating an environment where everyone feels heard and appreciated. By fostering a culture of collaboration, we aim to build strong, cohesive teams that work together to achieve shared goals and drive the company's success.

4.9 Complaint Resolution:

NAP has established a confidential, accessible mechanism for employees to report any instances of discrimination, harassment, or unethical behavior. We are committed to addressing complaints promptly and thoroughly, ensuring that employees feel safe coming forward without fear of retaliation. All complaints are taken seriously and investigated in accordance with company policies and legal requirements. Our aim is to resolve issues fairly and effectively, providing support to those affected and taking appropriate corrective actions. This process ensures that employee' concerns are heard and addressed, fostering trust and accountability within the workplace.

4.10 Policy Awareness:

NAP ensures that all employees are informed about the Non-Discrimination Policy through regular training, communication, and updates. The policy is made readily accessible via the company's internal portals and included in employee handbooks. Training programs are held periodically to reinforce the policy's principles and to educate employees on their rights and responsibilities. By ensuring that employees are fully aware of the policy and its expectations, we help create a workplace where everyone understands the importance of equal opportunity and mutual respect in maintaining a positive work environment.

5. Quantitative Objectives

Objective	Target	Timeline	Department
Increase Diversity in Hiring	25% increase in diverse candidates hired	By end of Year	HR
Employee Awareness	100% employees trained on non-discrimination annually	Annually	HR
Complaint Resolution	Resolve 90% of discrimination complaints within 30 days	Ongoing	HR & Compliance
Employee Engagement Score	Improve inclusivity rating by 15% in engagement surveys	Bi-Annually	HR
Retention Rate	Retain 90% of diverse employees annually	Annually	HR & Management

6. Distribution

The Non-Discrimination Policy will be distributed through multiple channels to ensure all employees are informed. It will be included in the employee handbook, which every employee will receive. During the onboarding process, new hires will be educated about the policy as part of their orientation program. A digital version of the policy will be made available on the company's intranet, ensuring easy access for all employees at any time. Additionally, regular training sessions will be conducted to reinforce the importance of the policy, ensuring that employees understand its contents and the company's commitment to a discrimination-free workplace.

7. Annual Review

The Non-Discrimination Policy will undergo an annual review to ensure its continued relevance and effectiveness. The review process will be led by the HR and Compliance teams, who will evaluate adherence to the policy, analyze the resolution of any discrimination-related complaints, and assess whether the policy is achieving its intended outcomes. Feedback from employees and stakeholders will be considered, along with any changes in laws or regulations that may require updates. Based on this assessment, the policy may be updated or revised to reflect evolving best practices and ensure ongoing compliance with legal and ethical standards.

8. Conclusion

NAP is dedicated to maintaining a fair, inclusive, and discrimination-free workplace, where every individual is valued and respected. Through this Non-Discrimination Policy, we aim to create a positive environment that celebrates diversity and encourages employees to contribute their unique talents. We are committed to upholding the principles of non-discrimination and ensuring equal opportunity for all, regardless of background or identity. This policy reflects our core values and commitment to fostering an inclusive culture, while integrating Environmental, Social, and Governance (ESG) principles into our operations, ensuring a workplace that supports growth and mutual respect for all.