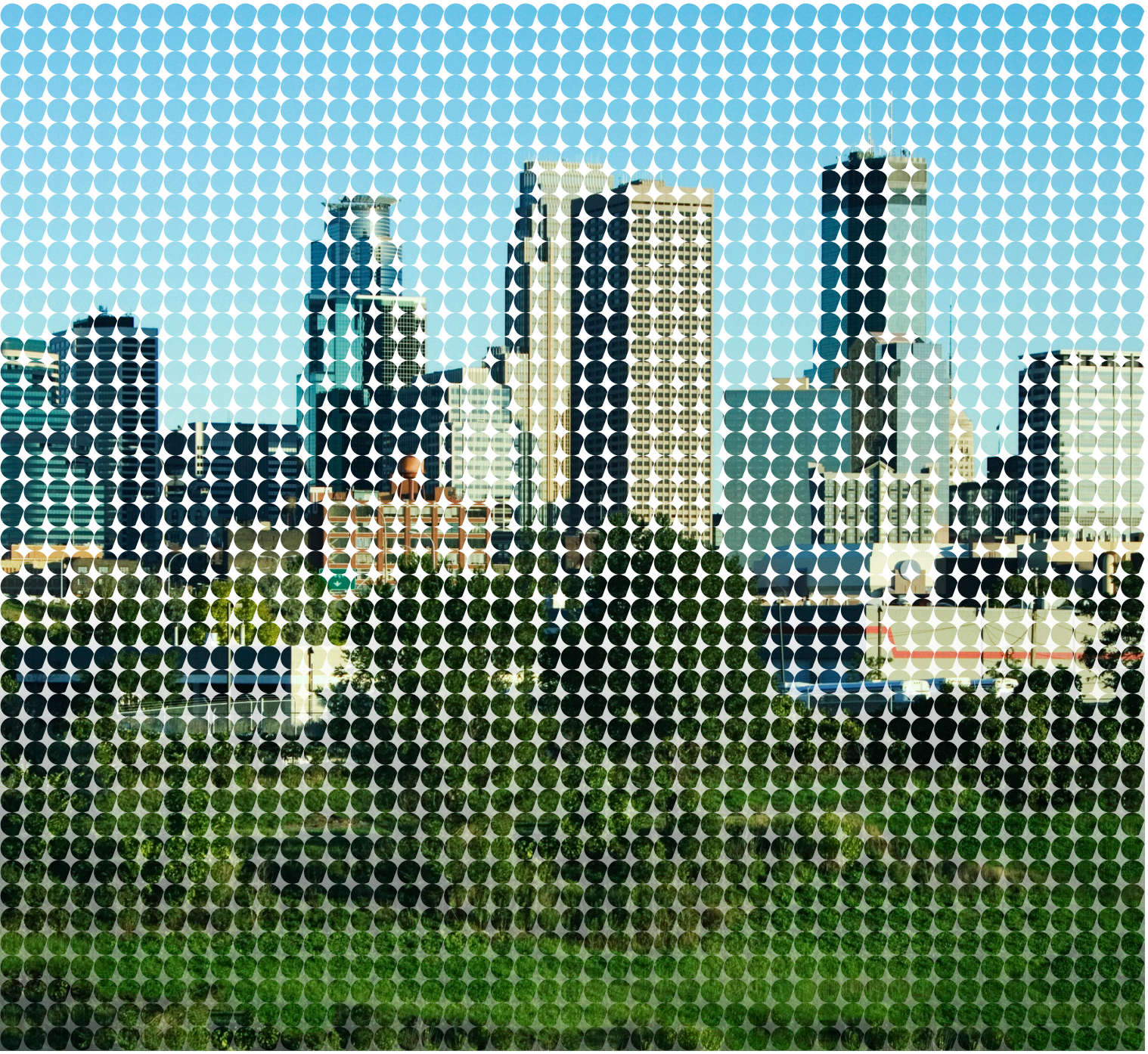


CORPORATE SOCIAL RESPONSIBILITY 2010

TOPSİL

CONTENT

A JOURNEY TOWARDS SUSTAINABILITY

The last five years have been the most successful in Topsil's history. We have been through a company turnaround with strong sales and growth earnings. We acquired Cemat, our Polish subsidiary in late 2008, which has increased flexibility in our business. We are heading for enlarged production capacity by building new, future proof facilities throughout 2011 and well into 2012.

During the same period there has been an increased focus on sustainability in society at large. This has on one hand been driven forwards by increased energy demand in the emerging economies as well as the West. Gradual depletion of conventional sources as well as an ongoing debate on climate change have on the other hand added further to this picture, backed up by international climate meetings such as the COP15 and recent COP2016 in Copenhagen and Cancun, respectively.

Cleantech products promote sustainable thinking

Intelligent power grids, smart cars and wiser ways to use electrical energy in transport and manufacturing all require silicon so pure that only a handful of companies in the world can supply it. As one of them, it seems obvious to focus on our own social and environmental performance, as we need consistency between the values that drive our market and those that drive our company.

We now publicly aim for goals such as minimising our environmental impact, increasing employee health and welfare and contributing positively to society, locally, nationally and abroad. We want to make it clear to our employees that our company´s success is linked to the sustainability agenda. We want to differentiate Topsil as a responsible and an attractive employer and we also want to create a common set of company values, regardless of location.

Some of the focal points in this report have been an integral part of our company for a long time, while others are new to us. On our journey towards sustainability, we will have to identify our own way, considering customer needs, the different circumstances in Denmark and Poland, and taking financial matters into account. We will thus proceed at a pace that makes sense, in respect to our size, capability and industry. Therefore, we have formulated corporate principles, with specific activities tailored to specific locations.

Our journey towards sustainability will not be a short break. On the contrary, it will continue well into the future. I am confident that this first report on our CSR activities will provide our stakeholders with valuable input on where we are heading. I am also confident that we will improve our programme gradually in the years to come.

Keld Lindegaard Andersen
Topsil CEO
March 2011

COMPANY PROFILE

Topsil was founded by Haldor Topsøe in Frederikssund, Denmark, in 1958. For more than 50 years, Topsil has devoted all efforts to the manufacture and sales of ultra-pure monocrystalline silicon wafers to selected niche markets in the global semiconductor industry. Since 2005, Topsil has been focussing on the power market, targeting mainly the energy, transport, industrial, medical and telecommunications sectors, and, to a lesser extent, the space, aviation and consumer goods industries. Today, about three quarters of Topsil's products end up in smart power applications, which may be defined as products that are involved with energy savings or energy efficiency.

The power market is characterised by very high, high and medium high voltage components, based on ultra-pure silicon. The manufacture of ultra-pure silicon is extremely complex and therefore only a handful of companies in the world can supply it, including Topsil. Due to recent years' increased demand for energy efficient and energy saving devices, Topsil's principal markets have shown considerable growth and these favourable trends are expected to persist.

In order to accommodate market growth and to meet customer demands on product development, steadily tighter quality limits, lower cost and shorter lead times, Topsil is planning to build new, future proof facilities in a Frederikssund recently established cleantech park, starting April 2011. The transition to the new location will be completed by the end of 2012 and the new factory will include a number of environmentally sound solutions. In addition to boosting capacity and enabling larger diameter wafers, supporting Topsil's entry into the automotive market, including smart cars, the new location serves as a statement of Topsil's progressing commitment to the environment, clean technology and energy effectiveness.

In autumn 2008, Topsil acquired Warsaw-based Cemat, and so the Frederikssund specialist staff of 92 employees was supplemented by 278 new, committed Polish colleagues. Cemat specialises in manufacturing silicon of less purity than that of Topsil, for the medium and low voltage levels. Furthermore, it has the equipment and expertise necessary to conduct wafering which has enabled Topsil to relocate a large proportion of this previously externally conducted activity to Cemat. By the end of 2010, Topsil counted 396 people amongst the staff.

BUSINESS PLATFORM
ATTRACTIVE POSITION IN THE VALUE CHAIN

THE SILLCON RAW MATERIAL

Topsil's main raw material, ultra-pure polysilicon, is produced from naturally occurring quartz sand, which is found in large volumes all over the world. The quartz sand is repeatedly refined in large chemical facilities and converted into technically pure silicon, after which it goes through a number of cleansing processes. The final result is polysilicon ingots of up to two meters.

The production of polysilicon requires billions of kroner investments which explains why there are only a few global manufacturers. The raw materials production for FZ-silicon is particularly complicated and there are only two global suppliers in this segment.

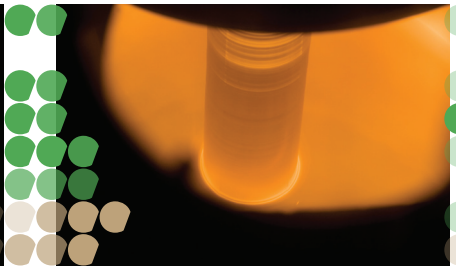
Topsil has concluded long-term contracts with both of these suppliers of raw material for FZ-manufacturing. Raw materials for the production of CZ silicon have been secured through annual contracts with three producers.

THE FZ-PROCESS

The FZ-process, which takes place at Frederikssund, begins with the preparation and surface purification of polysilicon ingots which are then mounted in a FZ-processing machine together with a seed crystal and melted at high induction heating temperatures. Once the silicon has melted, a seed crystal is introduced into the smelter, and the crystal is grown by adjusting heat conditions.

The electrical conduction of the silicon is adjusted by adding phosphorus to the crystal, either by adding phosphorus directly in the FZ-process (FZ-PFZ) or through neutron irradiation (FZ-NTD) which is more costly but results in more precise doping. This is done in nuclear reactors at the facilities of around 10 collaboration partners around the world.

FZ-silicon products are characterised by a very high degree of purity and electrical uniformity, and so they can be used in the most demanding high and medium-voltage components. The production process is based on customer specifications.



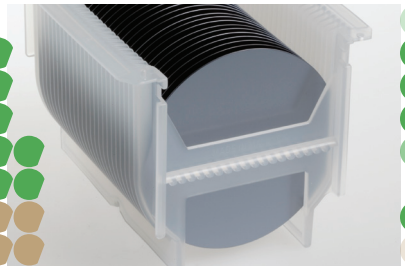
THE CZ-PROCESS

The CZ-process is based on crushed polysilicon that is melted in a quarts crucible at high temperatures. A seed crystal is subsequently dipped into the molten silicon and is slowly pulled upwards causing the CZ-crystal to solidify.

In the CZ-process, the crucible is dissolved during the heating process, resulting in contamination of the crystal. Hence, the purity of CZ-products may be up to 100 times lower than FZ-products, which reduces the electrical properties of CZ-products substantially. For this reason, they are primarily used in components to low-voltage applications such as microchips.

As in the FZ-process, the customer also defines the exact production parameters of the CZ-process. Production of CZ-silicon takes place at Topsil's subsidiary Cemat Silicon S.A. in Warsaw.

The production of silicon wafers for the semiconductor industry is based on a long value chain in which Topsil holds an attractive position. The value chain comprises production of the raw material, ultra-pure poly, Topsil's complex float zone (FZ) and czochralski (CZ) production processes, which give silicon its specific conducting properties, wafering, customers' production of electronic components based on Topsil's silicon wafers, and finally, mounting of the components in their final applications, e.g. in electric motors, computers, cars, solar cell panels, wind turbines, high-speed trains and power distribution networks.



WAFERING

The final step in Topsil's production of FZ and CZ-silicon is the productions of wafers. The wafers are produced using various grinding and cutting techniques and the wafters are cut in various thickness to customer specifications. The wafering process is the same for FZ and CZ-silicon.

A special type of wafer is the CZ-EPI wafer, which is based on the CZ-process. The CZ-EPI technology involves the application of a crystalline layer of silicon on a polished CZ- wafer, which improves the conducting properties of the wafer. The thicker the layer, the better the electrical properties.

Since the acquisition of Cemat in 2008, Topsil has transferred some of the wafering activities for FZ-silicon to the subsidiary which also handles the wafering of CZ and production of CZ-EPI. The remaining wafering takes place at third-party suppliers in Taiwan and the USA.

CUSTOMERS

Topsil sells most of its products directly but the Company also uses distributors in selected markets.

The customers produce electronic components on the basis of Topsil's silicon wafers. During production, the wafers undergo a number of processing phases in which electric conduction patterns are created and the final component properties are achieved.

The FZ-products are sold to some 30 customers, of which the three largest account for around 50% of total FZ-volumes.

CZ-products are sold to 20-25 customers, of which the five largest contributed around 90% of total CZ-sales.

END USE

Topsil's customers mount the components in controls or systems forming part of the finished applications, such as electric motors, wind turbines or flat screens.

Examples

A wind turbine is fitted with up to 50 energy-saving power controls based on FZ-NTD and FZ-PFZ silicon. The components control the movable parts of the turbine, rotation stop and start, and adjust the energy to the power grid.

The speed of an electric motor can be changed by regulating power in the motor through a frequency converter which allows efficient, fast and precise regulation. The transformer ensures lower overall energy consumption, since the motor does not run full speed all the time.

A frequency converter consists of electrical modules in the form of circuit boards mounted with system-adjusting components. A frequency converter contains between 20 and 50 components based on FZ-silicon.

CASE:
ESTABLISHING A CSR FRAMEWORK

How do you commit a diverse and always busy management group to define and shape a framework for corporate social responsibility, in a company spanning locations in two different countries, with close to 400 employees?

Topsil decided to get a head start; CEO Keld Lindegaard Andersen summoned the two management teams on a three day facilitated workshop on the small Danish island "Anholt", in late June 2010.

Outside, the sky was blue. Inside, in the dining room at Anholt Bed and Breakfast, time stood still. Coffee on the table, dressed in jeans and with cell phones switched off, thirteen Topsil and Cemat people were gathered in the room, accompanied by an external CSR expert who would get them through the workshop agenda.

Presentations were made. Discussions went on. Does CSR mean the same thing in Denmark and Poland? How far do we want to go, given our size? Can a well-defined CSR strategy become a competitive strength for in the future? What is the value for stakeholders? What is the value for Topsil? How do we report in a time of growth when consumption levels go up?

Heads were cleared on walks and rides around the island. Dinners were prepared while the sun set. Finally, on day three, the backbone materialised. It did make sense. An outspoken CSR strategy, including policies and activities, would help us focus and clarify important Topsil values, internally as well as externally. Our CSR framework would assist us in developing our organisation, differentiate us from our competitors and help future colleagues get a faster grip on Topsil.

The next step was to return to the office and appoint work groups to safeguard implementation. The outcome of the work group sessions is presented in this report.

ENGAGEMENT WITH OUR STAKEHOLDERS

Topsil interacts with the surroundings in a multitude of ways. On the meta level, we contribute to growth in society, through investment, employment and product manufacture. We pay enterprise taxes and our employees contribute to the local community through income taxes and voluntary work.

Our communication efforts mainly, but not exclusively, target the stakeholder groups listed below:

- SUPPLIERS
- CUSTOMERS
- EMPLOYEES
- INVESTORS
- AUTHORITIES
- BUSINESS PARTNERS
- LOCAL COMMUNITY
- MEDIA

Stakeholder dialogue

Continued dialogue with our stakeholders is paramount to monitoring and improving our performance. Therefore, we promote dialogue and value feedback from our surroundings, preferably through face-to-face interaction, as this provides us with the opportunity to receive immediate and spontaneous feedback.

We greet our stakeholders through regular participation in various activities, externally and internally. We meet up with customers, suppliers and business partners, attend conferences and fairs, and conduct customer surveys on an annual basis. We invite investors to join regular investor presentations or one-on-one meetings and reach out to the authorities and the local community through network activities and company visits. We inform our employees of important issues at staff and company meetings and conduct appraisals on an annual basis. We communicate with the media through press releases and interviews.

At every encounter, it is our aim to tailor our communication efforts to the particular situation and to communicate openly, accurately and reliably.

SIGNING THE UN GLOBAL COMPACT

In the 2009 Annual Report, the UN Global Compact principles were used as Topsil's point of reference to describe our stance on human rights, labour standards, the environment and anti-corruption.

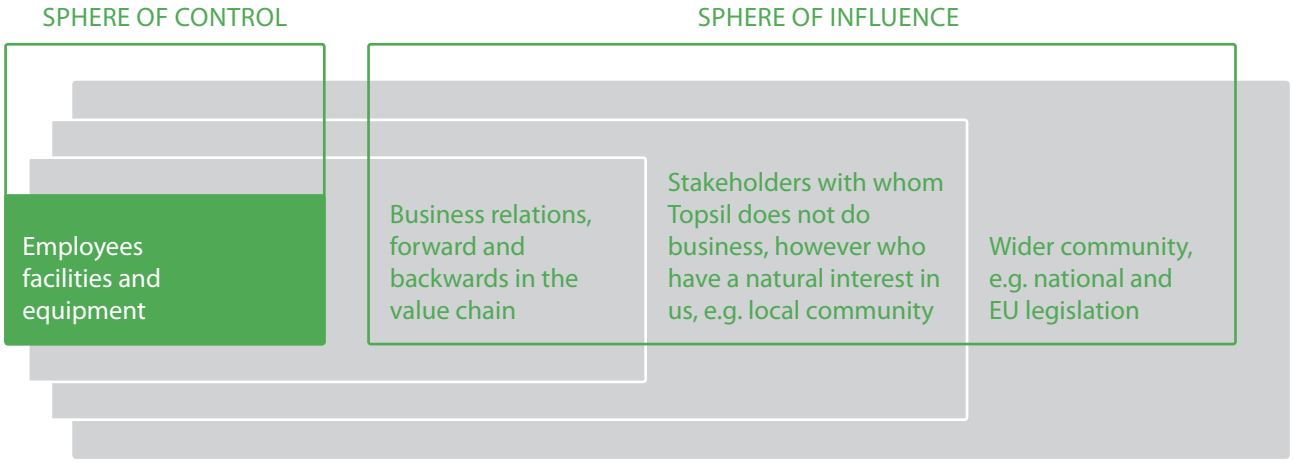
Following our work on establishing corporate CSR policies, procedures and activities during 2010, Topsil decided to officially commit to the Compact as a way to systemise and document our efforts further, within an internationally recognised framework.

The UN Global Compact was signed on 8 March 2011, following the financial year of the company. By signing the Compact we explicitly commit to:

- Support and respect the protection of internationally proclaimed human rights and make sure that we are not complicit in human rights abuses.
- Uphold the freedom of association and the effective recognition of the right to collective bargaining, work against all forms of forced and compulsory labour and the effective abolition of child labour and against discrimination in respect of employment and occupation.
- Support a precautionary approach to environmental challenges, take initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies.
- Work against corruption in all its forms, including extortion and bribery.

As part of our commitment we will report year on year progress on www.unglobalcompact.org and address all of the above four issues within a timeframe of five years.

CSR STRATEGY, POLICIES, MANAGEMENT AND REPORTING



CSR strategy

Value creation and risk management constitute the cornerstones in Topsil's CSR strategy. On top of this, Topsil has divided the various stakeholder groups into two types of sphere, please see above. In our approach to CSR, Topsil will primarily, but not exclusively, deal with activities that are within our sphere of control.

CSR policies

Topsil's CSR policies are rooted in the UN Global Compact principles. They serve as a common group standard and provide us with relevant guidelines when dealing with CSR-related matters, however with a focus on four issues singled out as being strategically important, thus requiring continuous improvement. These are:

- The environment
- Safety
- Health and wellbeing
- Diversity

CSR management

Topsil's CSR efforts belong to all management, supported by an internally assigned project manager, who reports to upper management. For each area of action, a corresponding work group has been appointed, con-

Topsil's aggregated CSR framework appears below. It is based on the fact that 75% of Topsil's products end up in clean tech devices, combined with the identified strategic issues within our sphere of control, as well as important issues outside our sphere of control.

sisting of management representatives in accordance with his or her area of responsibility. It is the obligation of all group members to head CSR implementation.

CSR reporting

In order to further structure, manage and report our environmental footprint, Topsil is preparing for the internationally recognised ISO14001 certification on corporate level, in 2011. We will, furthermore, introduce relevant Key Performance Indicators as an internal means for monitoring our performance.

The methodology for reporting on continuous progress can be found on page 21.

ENVIRONMENTAL PERFORMANCE

To fully understand how we interact with our surroundings, Topsil composed a thorough analysis of group level resource intake and exposure in 2010. This work was done in great detail to give the most accurate picture of our current impact on the environment. The aggregated map now forms the basis for singling out areas that make the most sense to improve, when balancing financial matters on the one hand with environmental consideration on the other.

Also in 2010, we finalised the planning of our new facilities, to be erected in 2011 and commencing production in 2012. The planning process has offered a unique possibility to integrate environmental consideration into the design from the outset to a much further extent than possible at our present facilities, dating back more than half a century.

Topsil´s new facility is to be situated in an upcoming cleantech park, half an hour out of Copenhagen. The park will solely be allocated to companies working with renewable energy and energy effectiveness. We expect that our new location will strengthen our possibilities of entering into sustainable partnerships in our local community throughout the coming years.

Policy on the environment

Topsil continuously strives to reduce the environmental impact of our operations by integrating environmental consideration into any activity with an environmental impact. We give priority to areas where we believe the effect will be greatest and commit to working methodically to reduce our energy consumption and waste, year on year. We meet environmental regulations and laws in the countries where we operate, and measure and set targets for our environmental performance.

CASE: Topsil - recycling water

The production of silicon requires relatively large amounts of water, which is becoming a scarce resource. In 2010, Topsil singled out water as an area of action and invested in new equipment for recycling grinding water at the facility in Denmark. Our efforts already manifested this year as our new equipment helped us decrease water consumption by 12%.

Reporting on water consumption

Water consumption, municipal water

	2009	2010	Target, 2011
Topsil	100	88	(61)
Cemat	100	117	(138)

(Index explanation on p. 21)

As appears from the above table, Topsil expects further reductions of water consumption 2011, largely due to the new equipment installed 2010. Cemat, on the other hand, expects a rise in consumption levels, given a planned change of product mix to an increased amount of EPI wafers, which require additional processing, including increased amounts of water.

CASE: Cemat - cutting down on electricity consumption

While mapping and benchmarking our two facilities in 2010, it became evident that the relative consumption of energy in Poland is on a much higher level than that of Topsil. Cemat therefore committed to mapping the electricity consumption of all machinery and other electrical equipment in detail, and to increasing energy awareness through internal education.

Reporting on electricity consumption

Electricity consumption

	2009	2010	Target, 2011
Topsil	100	104	(80)
Cemat	100	113	(119)

(Index explanation on p. 21)

Topsil expects a decrease in consumption of electricity in 2011, following the relocation of a further part of the FZ post processing to Cemat. Cemat expects increased levels of consumption as although activities will be launched to decrease consumption levels, the transfer of FZ post processing and an increased proportion of EPI wafers, requiring additional processing, will add to Cemat's overall consumption of electricity.

RETAINING A SAFE AND DEDICATED WORKFORCE

A safe work environment can be established and sustained only through a united effort by all employees. Management is responsible for a high safety standard in accordance with applicable legislation, rules and regulations, and that all employees work in compliance with established work practices and procedures. Topsil provides proper facilities and the safety equipment, education and training necessary to ensure a safe and healthy workplace. However, every employee plays an important role in enforcing the standards.

CASE: Corporate focus on acid management

2011 will be dedicated to stepping up our efforts on acid management. At Topsil, every employee handling acid will participate in an acid seminar, focussing on acid handling. Topsil will furthermore address the issue with the local health authorities. This step will be taken to ensure that the nearest hospital has the equipment necessary to handle acid related injuries, should an accident occur.

Cemat continues a process of storing acids more effectively. In 2010, new containers for EPI gasses and hydrogen were purchased. In 2011, the planning and execution of a new chemical materials warehouse is to follow.

Policy on safety

Safety must be top of mind when Topsil employees go to work. It is our position that all accidents can and should be prevented and that all hazards must be minimised through ongoing, structured efforts. Literally speaking, we want our staff to go home from work as healthy as they were when they arrived. In order to obtain this goal, it is a continuing objective to prevent accidents and work related ill-health through effective management, administration, education and training.

CASE: Topsil - focus on ergonomics

Topsil has a long tradition of managing safety on the basis of hazard minimisation. However, a recent externally conducted health check documented that we have more shoulder, back and arm related problems than that of the average Danish company. To curb this problem and to increase internal awareness on adequate working positions, Topsil will be drawing on external expertise 2011 to put ergonomics on top of the safety agenda.

Reporting on accidents

Accidents at work

	2009	2010	Target, 2011
Topsil	3	6	(0)
Cemat	2	1	(0)

(Index explanation on p. 21)

Both Topsil and Cemat report to the national work authorities in the case of work accidents. In order to push for safety related improvements in the company, a corporate goal of zero accidents has been set for 2011.

HEALTH AND WELL-BEING

It is management's ambition to create a good and safe working environment. A strong company, attractive to everyone, can be created only on the basis of a high level of employee satisfaction. Therefore, Topsil supplements pronounced focus on employee safety with various offers to promote social cohesion and increase job related commitment.

CASE: Topsil – preventing long term illness

In order to take a proactive stance on health promotion, Topsil adopted a well-being policy in 2009. The policy explicitly deals with sickness related absence and how to communicate and support a colleague faced with illness. The policy hence serves as a tool to raise awareness on the working environment and is moreover supplemented by specific targets on company level.

CASE: Topsil – health group

In late 2009, Topsil appointed a health group, involving employees from various departments as well as a management representative. The group was established to suggest and carry out health initiatives within the company. So far its efforts have resulted in a new company lunch programme, focussing on a wider choice of healthy dishes. 2011 will be dedicated to trying out different offers of physical exercise, as well as enforcing a smoke-free environment.

CASE: Cemat - social benefit fund to support employees in need

In accordance with Polish law, Cemat has established a social benefit fund to support employees in material difficulties, due to chance occurrences. On top of this mandatory programme, Cemat offers further support, either in the form of additional financial means or as loans that may be used in connection with acquiring accommodation.

PROMOTING DIVERSITY

CASE - corporate multilingual support

Sometimes, hiring the best person for the job, implies overcoming a barrier of language. Topsil actively encourages language training, whenever necessary, as part of the mandatory introduction programme. Cemat, furthermore, offers course-based English training to increase company language skills.

Keeping everybody onboard

In the case of long-term illness, both Topsil and Cemat have a long tradition of making arrangements to help the employee stay on board. Such arrangements are made on an individual basis, in accordance with the needs of the employee, combined with available company possibilities and resources.

CASE: Topsil - preventing discriminative behaviour

Topsil regards it a mutual responsibility of management and all staff to promote a harassment-free working environment. In order to prevent negative behaviour, Topsil has adopted an anti-bullying policy that describes in detail how to act and to whom staff should turn, should discriminatory behaviour occur.

Policy on diversity

Operating globally, Topsil regards a diverse workforce as an asset. We hire on the basis of talent and personality and offer the same possibilities to all employees, regardless of their background, religion, gender or age. We encourage that everybody reach their full potential in accordance with personal ambitions and goals.

We promote a work environment of respect and inclusion and expect our employees to act politically and religiously neutral, when acting on the behalf of the company. We acknowledge the right to organise and bargain collectively and do everything in our power to avoid discrimination.

SUPPLYING A RESPONSIBLE PRODUCT

Topsil represents one link in the supply chain, from raw material to final application. In regards to the value chain, we form part of a wider system, into which we need to gain insight, when pursuing sustainability.

Topsil

Within Topsil, we are establishing policies, procedures and systems in support of a sustainable manufacture of our products. A sustainable manufacture includes a number of elements, related to environmental consideration, people management and business ethics. On top of this, quality is the indisputable number one business parameter.

Our suppliers

Throughout the wider supply chain, Topsil cannot live up to sustainability improvements without supplier commitment. We prefer to select suppliers who, apart from offering high quality products, aim at progressing towards a more sustainable existence and who share values similar to those of Topsil. We have established and maintain close relationships with our suppliers, in which we can address sustainability issues. During 2011, we will inform our suppliers of Topsil's commitment to the UN Global Compact.

Our customers

Topsil complies with national legislation, international conventions and trade embargoes, ratified by Denmark. Our customers are mainly represented by large, international companies, many of which are already engaged in setting targets for and communicating on CSR. As Topsil's customers are not the final step in the value chain, Topsil will address the principles of the UN Global Compact with all customers in 2011.

COMMUNITY INVOLVEMENT

Community involvement may take many forms. It may be employees volunteering their time and resources for a special course, partnerships with educational institutions or sponsorships contributing to selected activities. Throughout Topsil's history, we have had a tradition of highly decentralised efforts, with passionate employees taking the lead.

Strategic sponsoring

Topsil has dual interest in contributing time or funding to the community. On one hand, we feel a natural obligation to take on public school trainees or offer our time to a locally held science camp, for the purpose of education. On the other, sponsorships are part of Topsil's marketing tool box and we therefore prefer to sponsor activities that deal with better and more intelligent use of energy, regardless of geography.

CASE: Topsil R&D partnerships

Topsil is funding a two year long post doc engineering project at Århus University, ending in 2011, and also a close partner of the Institut für Kristallzüchtung (IKZ), Berlin, with whom we have entered a co-operation agreement. The current IKZ agreement covers the financial support of a phd. student, conducting silicon processing research, ending in 2012.

CASE: Topsil local commitment

For the second year in a row, Topsil prepared a case-based science paper for the local upper secondary school, in autumn 2010. A number of pupils later visited Topsil to gain further company insight. In December, a group of Topsil employees volunteered their time at a locally held Christmas fair in support of families of limited means to celebrate Christmas.

Policy on sponsoring

Sponsorships are part of Topsil's marketing and communication activities and we therefore prioritise engaging in sponsorships that are long-term and naturally linked to our line of business. Topsil's sponsorships primarily cover activities related to the energy and sustainability agenda or other activities that offer positive visibility for our business.

We do not sponsor single persons or enter into sponsorships that support religious or political associations or societies.

REPORT STRUCTURE AND METHODOLOGY

The purpose of this report is to provide our stakeholders with Topsil's strategy, management approach and commitment concerning CSR. The 2010 CSR report is based on 2010 corporate data and covers main subsidiaries and operations. The reporting period corresponds with Topsil's fiscal year, 1st January – 31th December 2010.

A note on environmental data

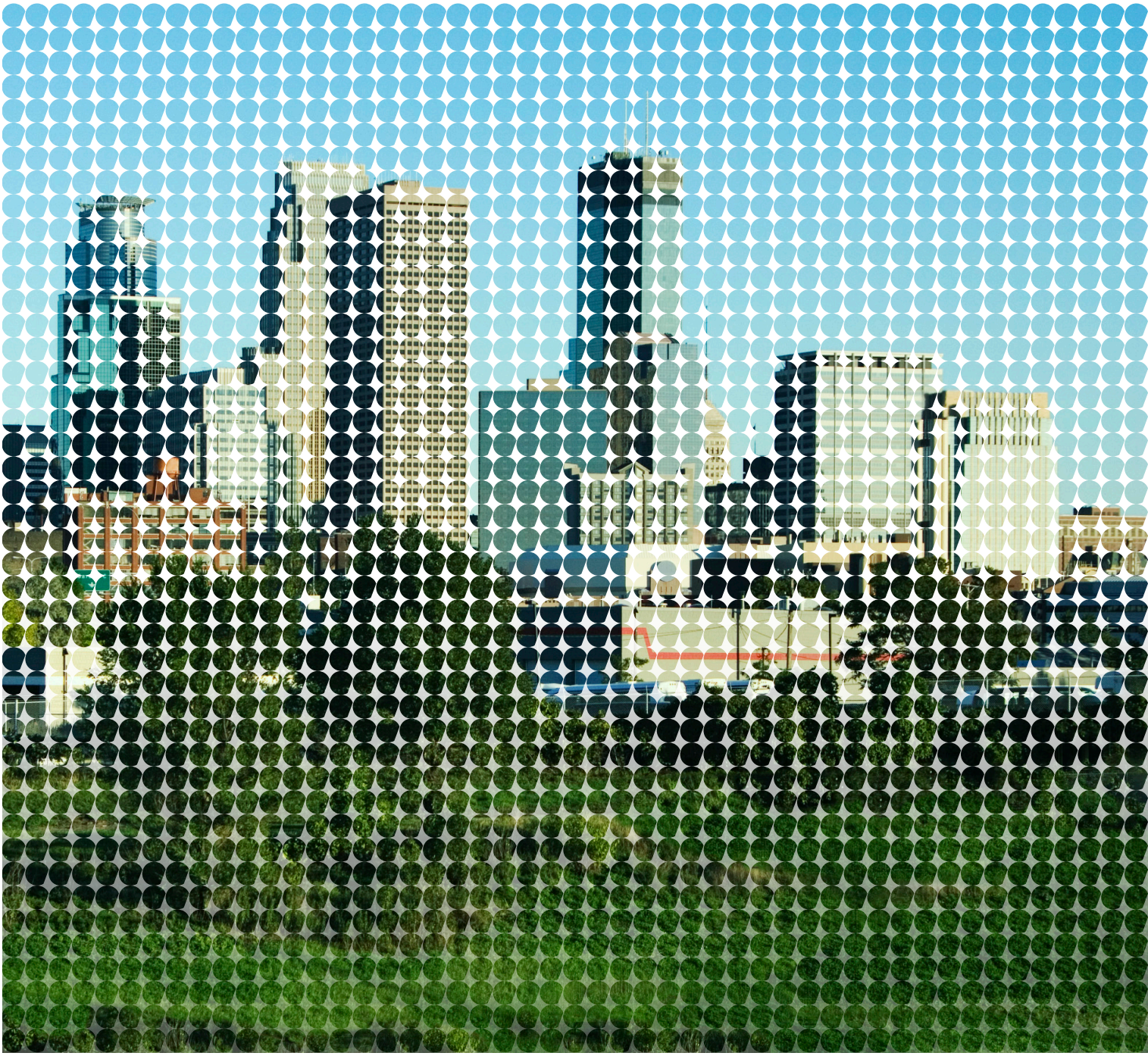
Topsil is a company of growth. So while we set targets for improving our environmental footprint on one hand, we also face a situation where the actual consumption increases, due to increased activity on the other. In order to give the best possible picture on where we are heading, we use indexed figures.

For Topsil, the index for water consumption is based on water m^3 divided by incoming raw material, in tonnes. The index for electricity consumption is based on MWh divided by incoming raw material, in tonnes.

For Cemat the index for water consumption based on water m^3 divided by m^2 wafers. The index for electricity consumption is based on MWh divided by m^2 wafers.

A note on safety data

The safety data correspond directly with reported figures to the national working environment council in Denmark and Poland. Hence, the incidence rate has not been indexed to the number of people employed in the year in question. Reporting to the working environment council takes place only if an occupational accident results in one day or more of unfitness for work, in addition to the day on which it occurred.



TOPSIL SEMICONDUCTOR MATERIALS A/S
Linderupvej 4
DK-3600 Frederikssund
Denmark
Tel. +45 47 36 56 00
Fax +45 47 36 56 01
E-mail: topsil@topsil.com
www.topsil.com
Version 1.0

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