

# FOCUS & GROWTH IN MYANMAR



# ABOUT THIS REPORT



This Sustainability Report covers Singapore Myanmar Investco Limited's ("**SMI**" or the "**Group**") performance and initiatives in the Environmental, Social and Governance ("**ESG**") aspects. For purposes of preparing the Sustainability Report, SMI engaged Baker Tilly Consultancy (Singapore) Pte Ltd to facilitate development of the sustainability framework and materiality assessment of ESG issues.

The scope of this report covers the financial year from 1 April 2018 to 31 March 2019. The Sustainability Report has been prepared in accordance with the Global Reporting Initiative ("**GRI**") Standards 2016, Core option. Unless otherwise stated, the report covers the ESG performance of the Group across its core operations in Singapore and Myanmar. The Group has not sought external independent assurance for the preparation of this report.

For greater environmental conservation, an electronic version of this Sustainability Report will be made available on SMI's corporate website ([www.sin-mi.com](http://www.sin-mi.com)). In addition, as part of our continual efforts on improving the report, we also welcome stakeholders to submit their feedback to [enquiries@sin-mi.com](mailto:enquiries@sin-mi.com).

# BOARD STATEMENT



## DEAR STAKEHOLDERS,

Sustainable growth is fundamental to SMI's business. The Board of Directors of SMI (the "**Board**") has considered the sustainability topics as part of our business strategy formulation and determined the material ESG factors that are important for SMI. The Board oversees the monitoring and management of the material ESG aspects.

Last year, we have established sustainability targets in our inaugural sustainability report. This year, we present our sustainability report for FY2019 to share our sustainability progress and milestones that we have achieved.

During the past year, we have taken measures to reduce plastic usage in our Food & Beverage (F&B) and Travel & Fashion Retail operations, reducing plastic bag usage as well as the usage of plastic cups in our restaurants. In the upcoming years, we will look into implementing more initiatives to further reduce plastic waste in our operations.

In order to deliver quality services to our consumers, we place heavy emphasis in recruiting, training and developing service-oriented employees across all our business lines. We greatly value our people and seek to continue to grow our talent pool through our investments in training and development of our employees.

As we strive to become Myanmar's leading retail and F&B group with a strong focus on the consumer, we continue to contribute to the development of local communities by creating jobs, paying taxes and doing business with local enterprises. And we are into our second year of a major sponsorship of Room to Read the educational charity and have also sponsored performance by young Myanmar nationals who are developing an interest in classical music.

We are grateful for the support we have received from our stakeholders in our years of operations. Moving forward, we strive to work alongside with our stakeholders for greater value creation.

# OUR BUSINESS AND STRATEGIES

SMI is an investment and management company focused on high-growth emerging economy of Myanmar. SMI strives to play an active and pioneering role in modernisation and growth of Myanmar by introducing ground breaking international products and services to Myanmar to meet emerging consumer and development demand.

SMI is listed on the Main Board of Singapore Stock Exchange and is led by an experienced and talented management team. With deep-rooted track records of success in Myanmar, SMI has established itself as reputable partner of choice in Myanmar for global brands.



## Travel and Fashion Retail

World class multi-category duty free brands supplied by DFS and a wide range of international fashion and lifestyle brands at the International Airport and in domestic malls



## Food and Beverage

Franchise or license agreements with reputable F&B brands, such as Crystal Jade Kitchen, Coffee Bean and Tea Leaf and Ippudo.

Beverage distribution of Wine, Monin Syrups and San Pellegrino Water to hotels and restaurants, patisseries and coffee shops.

# OUR BUSINESS AND STRATEGIES

## Construction Services

SMI has a partnership with one of China's leading heavy equipment manufacturer, SANY, to market and distribute machineries.



## Auto Services

SMI has a franchise agreement with Europcar to provide car rental services in Myanmar. There are about 130 cars in our fleet in active service.

## Logistics Services

International standards of logistics services including trucking, warehousing and cold storage facilities



# STAKEHOLDER ENGAGEMENT

Long-term engagement with our stakeholders through various channels offers important inputs that guide our decision-making process and assist us in achieving our sustainability commitments. Our key stakeholders include our employees, investors, business partners, the community, government departments and national agencies.

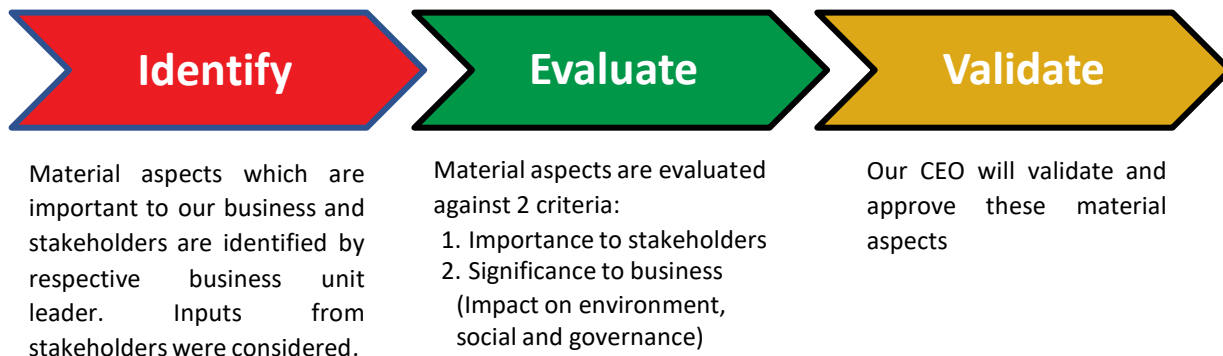
The table below summarises the various stakeholder engagement activities, key concerns of stakeholders which we have gathered and platforms which SMI utilises to reach out to our stakeholders.

| Stakeholder                                  | Platforms  | Frequency  | Key Feedback and Concerns  |
|--|--|------------|--|
| Employees <sup>1</sup>                       | Interviews / feedback sessions                   | Ad-hoc     | <ul style="list-style-type: none"> <li>• Employee safety and welfare</li> <li>• Staff training and development opportunities</li> <li>• Remuneration and benefits</li> <li>• Fair and competitive employment practices</li> <li>• Overseas training trips</li> </ul> |
|  | Regular dialogue sessions with senior management | Bi-monthly |  |
|  | Performance appraisal                            | Annual     |  |
|  | Team bonding sessions                            | Ad-hoc     |  |
|  | Training   | Ad-hoc     |  |
| Investors                                    | Annual and extraordinary general meetings        | Annual     | <ul style="list-style-type: none"> <li>• Updates on financial performance</li> <li>• Economic and political environment in Myanmar</li> <li>• Compliance to international standards on anti-corruption</li> <li>• Long-term growth prospects</li> </ul>              |
|  | Analyst reports                                  | Quarterly  |  |
|  | Investor relations contact                       | Annual     |  |
|  | SGX announcement, media release and interviews   | Ad-hoc     |  |
|  | Company website                                  | Perpetual  |  |
| Government Departments and National Agencies | Official visits                                  | Ad-hoc     | <ul style="list-style-type: none"> <li>• Compliance with laws and regulations relating to various business sectors</li> <li>• Facilitating the growth of the Myanmar economy</li> </ul>  |
|  | Meetings, briefings and regular reporting        | Ad-hoc     |  |
|  | Joining trade associations and industry forums   | Ad-hoc     |  |
| The Community                                | Sustainability report                            | Annual     | <ul style="list-style-type: none"> <li>• Supporting the local community</li> <li>• Provide job opportunities and development</li> </ul>  |
|  | Corporate social responsibility activities       | Ad-hoc     |  |
| Franchisers                                  | Meetings, briefings and regular reporting        | Ad-hoc     | <ul style="list-style-type: none"> <li>• Establishing and maintaining good relationships</li> <li>• Compliance to contract requirements</li> </ul>   |
| Suppliers/ Vendors                           | Vendor evaluation                                | Annual     | <ul style="list-style-type: none"> <li>• Maintaining good relationship</li> <li>• Quality products and services</li> <li>• Environmental compliance</li> <li>• Certification compliance</li> </ul>   |
|  | Regular meeting with key suppliers               | Ad-hoc     |  |
|  | Quality control inspections                      | Ad-hoc     |  |

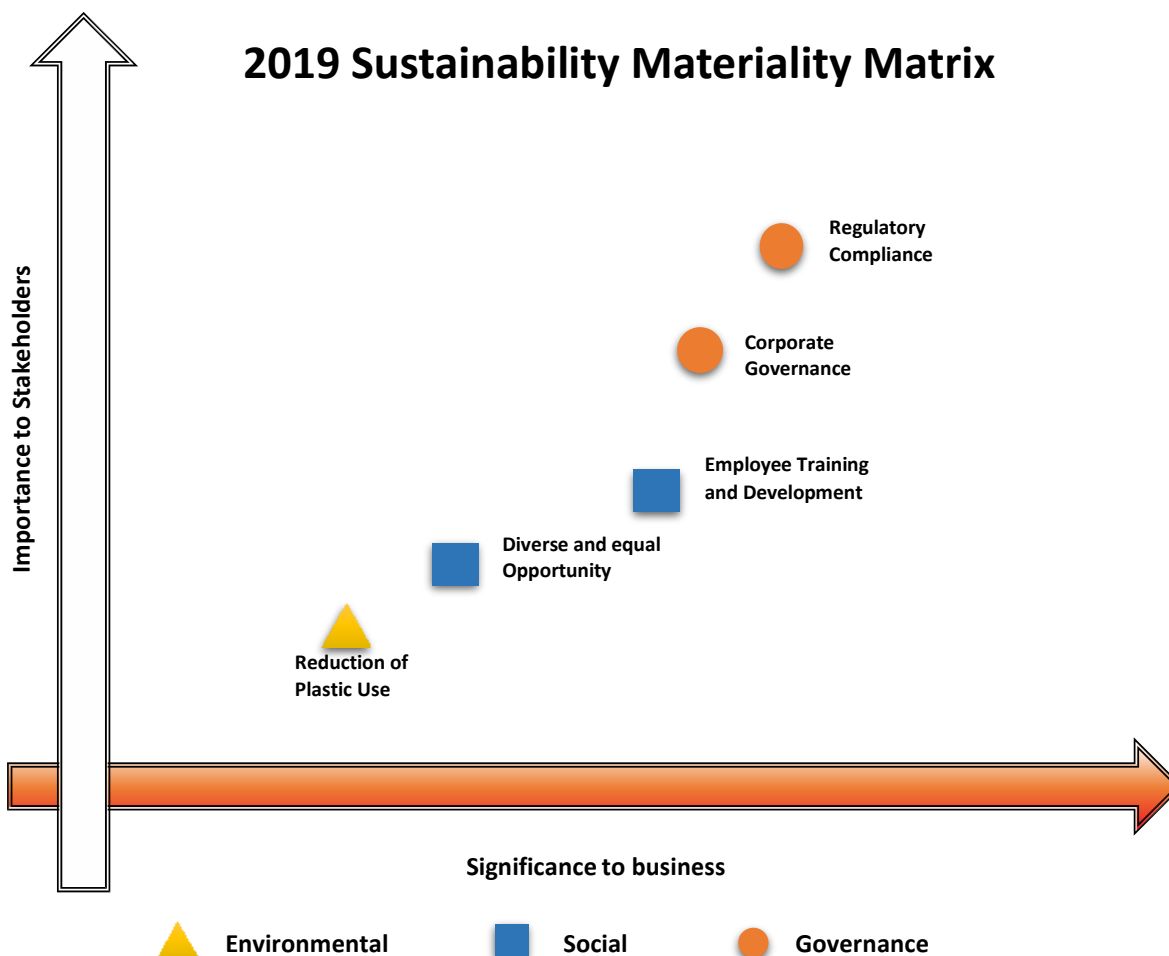
<sup>1</sup> "Employees", in the context of this Sustainability Report, refers collectively to the employees of SMI and its local business partners

# MATERIALITY ASSESSMENT






We have performed materiality analysis to identify sustainability issues that are of importance to our business and stakeholders. This assessment helps us bring focus to key areas that we seek to improve on as we make progress in achieving the long-term sustainability of our business.



Led by our CEO, the various Business Unit Heads assist in providing inputs and execution of initiatives related to the Group’s sustainability. Our review focuses on 3 key aspects (Environment, Social, and Governance) and 5 identified material topics, with the factors being plotted based on their importance to stakeholders against the significance to our business in the materiality matrix below.



# MATERIAL TOPICS

| Material Topics  | Relevance to SMI  | How are we addressing the issue   |
|--|---|---|
| <b>Governance Dimension</b>  |   |   |
| Regulatory Compliance<br>               | SMI is committed to conduct and manage its business and assets in compliance with applicable laws and regulations, which is essential for the long-term sustainability of the business. | SMI has put in place internal controls and procedures to embed compliance into its day-to-day operations. In addition to proactively identifying and responding to applicable new rules and regulations, internal audits are also carried out annually to ensure compliance.                          |
| Corporate Governance<br>                | Good corporate governance is necessary to enable SMI to operate more efficiently, effectively as well as mitigating risk and safeguarding the interests of our stakeholders.            | SMI is committed to good corporate governance and transparency in its endeavours. All employees are aware of the corporate code of conduct and are expected to abide by it.   |
| <b>Social Dimension</b>  |   |   |
| Diverse and Equal Opportunities<br>   | An inclusive workforce provides SMI with diverse perspectives, skills and talents. As such, SMI ensures that everyone is given fair opportunities regardless of ethnicity and gender.   | SMI adopts merit-based recruitment practices and emphasizes diversity and inclusiveness, with the individual's competencies and job fit being the basis of hiring.  |
| Employee Training and Development<br> | Our people are critical assets to the Group and it is therefore crucial for us to invest and support them in their development.   | Employees are sent for training programs to upgrade and improve their skillset. The training courses include language classes on English and Mandarin, allowing our local Burmese employees to better serve our international customers, customer service, food safety and handling, leadership, etc. |
| <b>Environmental Dimension</b>   |   |   |
| Reduction of Plastic use<br>          | Responsible use of resources such as plastic, reduces the environmental impact on the local ecology and make us a more cost-effective organisation.                                     | Paper bags have been introduced to reduce the usage of plastic bags at our retail stores. During FY2019, the use of porcelain milk jugs at Coffee Bean and Tea Leaf to replace plastic cups have been implemented.  |



# GOVERNANCE

## Regulatory Compliance



### FY2019 Performance

The Group has achieved zero incidents of non-compliance with laws and regulations for which significant fines or non-monetary penalties were incurred.

Achieving a high standard of ethical business conduct is fundamental to building a sustainable business. We seek to comply with all relevant laws and regulations including the Listing Manual of the Singapore Exchange Securities Trading Limited, Companies Act and Employment Act.

In addition, we have attained the required Business Permits and Licenses for all our operations in Myanmar. Examples of the Business Permits and Licenses that we have attained include Business Licenses for the operation of SMI Rental Ltd, SMI Food Concept Ltd and Mar Myanmar Ltd in Myanmar, as well as the warehouse operation permit for Senko-SMI Myanmar Co Limited.

All our restaurant outlets have also been issued the required restaurant permits by Yangon City Development Committee (YCDC) for operations.

## Corporate Governance



### FY2019 Performance

In FY2019, the Group has issued warnings to **26** employees for misconduct and terminated **46** employees due to breach of Code of Conduct.

SMI ensures that our businesses are carried on and conducted in a proper and efficient manner adhering to the principles and guidelines of the Code of Corporate Governance 2012.

Additionally, we strive to inculcate a strong corporate culture within our Group and have zero tolerance towards corruption and fraud. Our ethical practices are spelled out in our Code of Conduct, as well as in policies about corporate governance, anti-corruption, occupational health and safety, supplier conduct, and data privacy.

### Risk Assessment and Management

SMI aims to mitigate our exposures through appropriate risk management strategies and internal controls. The Board is responsible in overseeing the risk governance of the Group, ensuring that the Management maintains a sound system of risk management and internal controls to safeguard stakeholders' interests and our Group's assets. Internal audits are also carried out annually to provide independent assurance to the Audit Committee ("AC") on the effectiveness and adequacy of our internal control and compliance processes.

Details of the Group's approach to risk management and internal controls are set out in the Corporate Governance Report, which can be found in page 37 to 40 of the Annual Report.

On top of our risk management approach, policies and procedures including the Employees' Code of Conduct, anti-corruption and whistle blowing are also in place to instill the value of integrity and transparency within the Group.

### Employees' Code of Conduct

The behaviour expected from our employees is codified in our employees' Code of Conduct. The underlying principle for our Code of Conduct is that we expect our employees to act with integrity towards those with whom we have business dealings, to the larger society with whom we conduct our business, and towards each other.

An employee handbook that covers penalties for misconduct and fraud, and guides all employees in their everyday conduct is made available to all employees. For new hires, they are made aware of our stance against corruption and fraudulent activities during the orientation programme.

The Employees' Code of Conduct provides the following examples of misconduct that shall lead to disciplinary actions:

- Dishonest actions or unethical conduct;
- Unauthorised dissemination of the Group's confidential documents and data;
- Acting beyond the authority granted to his/her position; and
- Receiving of gifts or money from business counterparts without prior approval from the Group

### Anti-Corruption

We strive to inculcate a strong corporate culture within our Group and have zero tolerance towards corruption and fraud. An Anti-Corruption policy is in place, setting out rules governing the following areas:

- Reporting on actual or suspected corruption and bribery
- Guidance on gift giving and acceptance
- Training and awareness
- Disciplinary action

The Anti-Corruption policy is communicated to all employees during the initial staff onboarding process.

### Whistle Blowing

We have whistleblowing policy and channels to allow employees to report concerns over any unlawful conduct, financial malpractice or other wrong-doings that poses risks to the Group, the public or the environment. Under this policy, employees may report suspected matters of wrongdoing affecting the Group to the Whistle Blowing Officer via the following email: [whistleblowing@sin-mi.com](mailto:whistleblowing@sin-mi.com). Through our independent whistleblowing channel, employees are able to report any suspected misconducts without reprisal.

For further details, please refer to pages 25 to 44 for our Corporate Governance Report in our Annual Report 2019.



#### **Targets**

- Maintain zero incidents of non-compliance with laws and regulations for the coming year.
- Strive towards zero instances of breach in corporate governance.

# SOCIAL

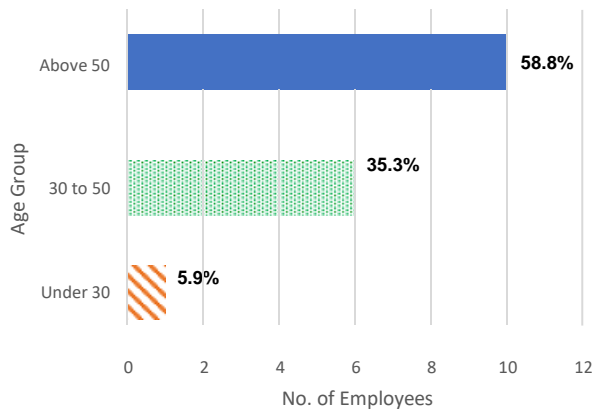
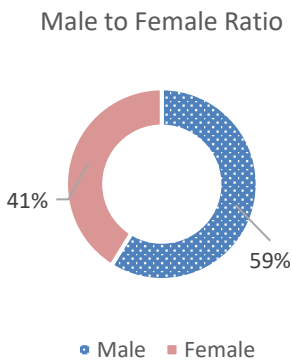
The success of SMI attributes to our employee's effort and contribution towards the Group. We recognise that they are our most valuable assets. It is the Group's responsibility to empower our employees with opportunities for progression and further learning exposures and ensure we operate ethically.

## Our Employees

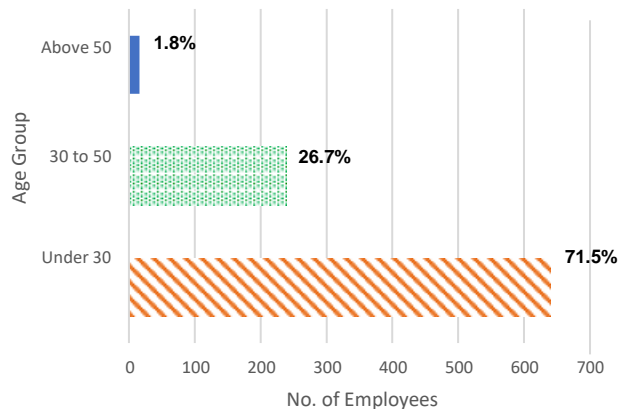
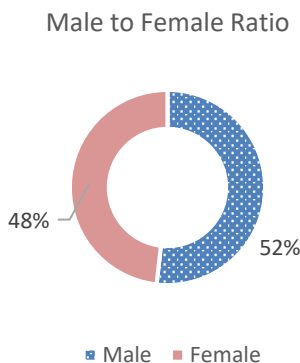
SMI's businesses (group and local business partners) employ over 900 individuals from diverse ethnicities and backgrounds. We acknowledge the importance of providing equal opportunity to employees regardless of age, gender, nationality and ethnicity. The breakdown of our workforce in Singapore and Myanmar offices as at 31 March 2019 is as follows:



### Employee Distribution – Singapore Head Office



### Employee Distribution - Myanmar



## Employee Training and Development



### FY2019 Performance

**56.6%** of our employees have undergone at least one training held by SMI / Business Partners

We provide training opportunities to our employees to develop their skills. Firstly, we provide language trainings for employees working at the airport to enhance their ability to communicate effectively with tourists and business travelers from different nationalities.

In addition, we have product training for employees working as brand representatives for our business partners to ensure they are adequately equipped with product knowledge and information for their customers.

We also conduct customer service training for our employees, such as role-play and scenario-based training, to help our employees understand our customers' expectations. With that in mind, employees are better service personnel to provide a smooth and pleasant customer shopping experience. In the F&B franchised outlets, we provide training on food handling, hygiene and safety.

### Employee Engagement

At SMI, we strive to create a positive and healthy work environment for our employees. We actively engage employees in various activities to promote and organise work-life balance initiatives within the Group.

Over FY2019, we have organised several team bonding events, dinners and charity engagements for our employees.



### Targets

50% of all employees to undergo at least one training activity in FY2020

## Workplace Health and Safety



### FY2019 Performance

Zero workplace accident in FY2019.

Our employees' safety, and their physical and mental health are of utmost importance to us. We take great effort in ensuring a safe and conducive work environment for our employees. We perform periodic safety inspections at all our premises to ensure that our employees work in a safe environment.

### Embedding a Safety Culture

Placing great emphasis on building a safety culture within SMI, we have established a set of safe work procedures to guide our employees on safety practices at work. We provide safety orientation course to new hires to ensure that they have the necessary training and skills relating to safety. Moreover, we conduct daily safety exercise routines to ensure that employees are ready for work. We also performed annual emergency response drill and fire drill to prepare our employees in the event of emergency situations.



*Embedding a safety culture amongst employees*



*Employees participating in daily exercise*



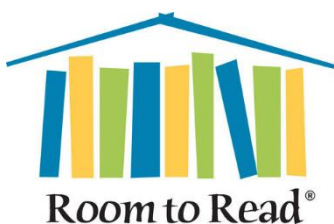
### Targets

To maintain zero workplace accident in FY2020.

## Community Involvement

At SMI, we aim to deliver positive impact to the local communities we operate in. Therefore, over the years, the Group actively engages the local community and partake in various social initiatives to improve the living standards and conditions of the locals. The following are some activities we have supported in FY2019.

### Room to Read



Room to Read was founded in 2000 with the vision of a world in which all children can pursue a quality education that enables them to reach their full potential and contribute to their communities and the world. SMI is proud to be supporting Room to Read's two-year literacy project in Myanmar. Our President & CEO, Mark Bedingham, is also a committee member of the ASEAN Regional Board for Room to Read

Under the Room to Read program, SMI works with the local business partner, Myanmar Book Aid and Preservation Foundation to establish and support 20 libraries in three regions in schools as well as give educators in the schools the skills and tools to sustain the libraries so that students have the opportunity to foster a habit of reading.



### Philharmonic Society of Myanmar's Festival and Competition

The Philharmonic Society of Myanmar's Festival and Competition is the country's premier classical music festival, designed for music professionals, and students. The festival aims to create a conducive environment for musicians in Myanmar to work under the guidance of international artists, and to build international friendships through music. SMI has contributed to the event and further the cause of promoting music amongst local students.

### Community Involvement Programs

At SMI, we encourage our employees to initiate and propose community involvement programs to engage the local communities. In FY2019, we have sent our employees for several visits to villages and communities to engage with the locals and provided support through donations.



# ENVIRONMENTAL

SMI is committed to managing and minimising our ecological footprint across our business value chain, which includes our business operations, suppliers and customers.

Just as we strive to become Myanmar’s leading consumer-centric group, we also hope to promote public awareness for environmental conservation in Myanmar.

## Reduction in Plastic Use



### FY2019 Performance

As at 31 March 2019, approximately **50%** of our F&B and Retail outlets have switched from using plastic bags to biodegradable paper bags.



Plastic and other non-biodegradable waste have devastating effect on our environment and wildlife. Hence, reducing plastic waste is one of our key areas of sustainability focus. We have embarked on a journey to reduce single-use plastics in our operations by replacing them with reusable items or alternative sustainable materials, such as the use of paper bags for our retail stores, in place of plastic ones.

At our Coffee Bean and Tea Leaf outlets, we have also replaced plastic cups that were used to contain milk with porcelain jugs. Moving forward, we continue to look to implement more initiatives, such as reducing the use of straws at our outlets to reduce plastic waste.



Through these initiatives, we hope to not only reduce plastic waste produced from our operations, but also create a public awareness for environmental conservation efforts in Myanmar.

## Reducing Energy Usage

We recognise that investing in energy conservation not only reduces our carbon footprint but also makes business sense in cost savings. Therefore, we are committed to taking measures in minimising our overall energy consumption and improving energy efficiency to reduce the environmental impact of our operations.

In the conduct of our business activities, the main areas of electricity usage are predominantly across our offices, outlets and warehouse operations.

In FY2019, we have retrofitted conventional mercury lamps with more energy efficient LED lightings at our warehouse. The LED lightings are approximately 80% more energy efficient than the mercury lamps.



## Environmental Compliance

SMI is committed to comply with all applicable environmental regulations enforced by local authorities in all jurisdictions we operate in. We closely monitor our operations and perform periodic reviews to ensure that we comply with relevant environmental requirements and regulations.



### Targets

- Implement more green initiatives to reduce waste output and energy usage.
- Full compliance with relevant environmental regulations in Myanmar and Singapore.



# GRI CONTENT INDEX

| GRI Standard           | Disclosure Title  | Page Reference & Remarks                                   |
|------------------------|---|--|
| General Disclosure     |   |  |
| Organisational Profile |   |  |
| Disclosure 102-1       | Name of the organisation  | Page 1   |
| Disclosure 102-2       | Activities, brands, products, and services                                    | Annual Report Page 4 - 11                                  |
| Disclosure 102-3       | Location of headquarters  | 300 Beach Road #29-01<br>The Concourse<br>Singapore 199555 |
| Disclosure 102-4       | Location of operations  | Annual Report Page 4 - 11                                  |
| Disclosure 102-5       | Ownership and legal form  | Annual Report Page 72 - 75                                 |
| Disclosure 102-6       | Markets served  |  |
| Disclosure 102-7       | Scale of the Organisation   |  |
| Disclosure 102-8       | Information on employees and other workers                                    | Page 10 – 13   |
| Disclosure 102-9       | Supply chain  | Annual Report Page 12 - 15                                 |
| Disclosure 102-10      | Significant changes to the organisation and its supply chain                  |  |
| Disclosure 102-11      | Precautionary Principle or approach   | Page 8 – 9   |
| Disclosure 102-12      | External initiatives  | Page 1   |
| Disclosure 102-13      | Membership of associations  | None.  |
| Strategy               |   |  |
| Disclosure 102-14      | Statement from senior decision maker  | Page 2   |
| Disclosure 102-15      | Key impacts, risks, and opportunities   | Page 6 – 7   |
| Ethics and Integrity   |   |  |
| Disclosure 102-16      | Values, principles, standards, and norms of behaviour                         | Annual Report Page 1                                       |
| Disclosure 102-17      | Mechanisms for advice and concerns about ethics                               | Page 5   |
| Governance             |   |  |
| Disclosure 102-18      | Governance structure  | Annual Report Page 25 - 44                                 |
| Disclosure 102-19      | Delegating authority  |  |
| Disclosure 102-20      | Executive-level responsibility for economic, environmental, and social topics | Page 6   |
| Disclosure 102-21      | Consulting stakeholders on economic, environmental and social topics          | Page 5   |
| Disclosure 102-22      | Composition of the highest governance body and its committee                  | Annual Report Page 25 - 44                                 |
| Disclosure 102-23      | Chair of the highest governance body  |  |
| Disclosure 102-24      | Nominating and selecting the highest governance body                          |  |
| Disclosure 102-25      | Conflicts of interest   |  |
| Disclosure 102-26      | Role of highest governance body in setting purposes, values, and strategy     |  |
| Disclosure 102-27      | Collective knowledge of highest governance body                               |  |
| Disclosure 102-28      | Evaluating the highest governance body's performance                          |  |
| Disclosure 102-29      | Identifying and managing economic, environmental, and social impacts          | Page 6 – 7   |
| Disclosure 102-30      | Effectiveness of risk management process                                      | Annual Report Page 25 - 44                                 |
| Disclosure 102-31      | Review of economic, environmental, and social topics                          | Page 6 – 7   |
| Disclosure 102-32      | Highest governance body's role in sustainability reporting                    | Annual Report Page 25 - 44                                 |
| Disclosure 102-33      | Communicating critical concerns   | Page 1   |
| Disclosure 102-34      | Nature and total number of critical concerns                                  | Page 8 – 9   |
| Disclosure 102-35      | Remuneration policies   | Annual Report Page 25 - 44                                 |
| Disclosure 102-36      | Process for determining remuneration  |  |
| Disclosure 102-37      | Stakeholders' involvement in remuneration                                     |  |
| Disclosure 102-38      | Annual total compensation ratio   |  |
| Disclosure 102-39      | Percentage increase in annual total compensation ratio                        |  |
| Stakeholder Engagement |   |  |
| Disclosure 102-40      | List of stakeholder groups  | Page 5   |
| Disclosure 102-41      | Collective bargaining agreements  | None.  |
| Disclosure 102-42      | Identifying and selecting stakeholders  | Page 5   |

| GRI Standard                          | Disclosure Title  | Page Reference & Remarks   |
|---------------------------------------|---|----------------------------|
| Disclosure 102-43                     | Approach to stakeholder engagement  | Page 5                     |
| Disclosure 102-44                     | Key topics and concerns raised  | Page 5                     |
| <b>Reporting Practice</b>             |   |                            |
| Disclosure 102-45                     | Entities included in the consolidated financial statements  | Annual Report Page 87 - 89 |
| Disclosure 102-46                     | Defining report content and topic boundaries  | Page 1                     |
| Disclosure 102-47                     | List of material topics   | Page 6 – 7                 |
| Disclosure 102-48                     | Restatements of information   | None.                      |
| Disclosure 102-49                     | Changes in reporting  | None.                      |
| Disclosure 102-50                     | Reporting period  | FY2019                     |
| Disclosure 102-51                     | Date of most recent report  | 28 Feb 2019                |
| Disclosure 102-52                     | Reporting cycle   | 1 Apr 2018 to 31 Mar 2019  |
| Disclosure 102-53                     | Contact point for questions regarding the report  | Page 1                     |
| Disclosure 102-54                     | Claims of reporting in accordance with the GRI Standards  |                            |
| Disclosure 102-55                     | GRI content index   | Page 16 – 18               |
| Disclosure 102-56                     | External assurance  | None.                      |
| <b>Management Approach</b>            |   |                            |
| Disclosure 103-1                      | Explanation of the material topic and its Boundary  | Page 6 – 9                 |
| Disclosure 103-2                      | The management approach and its components  |                            |
| Disclosure 103-3                      | Evaluation of the management approach   |                            |
| <b>Economic Performance</b>           |   |                            |
| Disclosure 201-1                      | Direct economic value generated and distributed   | Annual Report Page 55 - 58 |
| Disclosure 201-3                      | Defined benefit plan obligations and other retirement plans   | Annual Report Page 78      |
| <b>Anti-Corruption</b>                |   |                            |
| Disclosure 205-2                      | Communication and training about anti-corruption policies and procedures  | Page 8 – 9                 |
| Disclosure 205-3                      | Confirmed incidents of corruption and actions taken   |                            |
| <b>Anti-Competitive Behaviour</b>     |   |                            |
| Disclosure 206-1                      | Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices  | Page 8 – 9                 |
| <b>Energy</b>                         |   |                            |
| Disclosure 302-4                      | Reduction of energy consumption   | Page 14 – 15               |
| Disclosure 302-5                      | Reductions in energy requirements of products and services  |                            |
| <b>Environmental Compliance</b>       |   |                            |
| Disclosure 307-1                      | Non-compliance with environmental laws and regulations  | Page 14 – 15               |
| <b>Employment</b>                     |   |                            |
| Disclosure 401-1                      | New employee hires and employee turnover  | Page 10 – 13               |
| Disclosure 401-2                      | Benefits provided to full-time employees that are not provided to temporary or part-time employees                            |                            |
| Disclosure 401-3                      | Parental leave  |                            |
| <b>Occupational Health and Safety</b> |   |                            |
| Disclosure 403-1                      | Workers representation in formal joint management-worker health and safety committees   | Page 10 – 13               |
| Disclosure 403-2                      | Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities |                            |
| Disclosure 403-3                      | Workers with high incidence or high risk of diseases related to their occupation  |                            |
| Disclosure 403-5                      | Worker training on occupational health and safety   |                            |
| Disclosure 403-6                      | Promotion of worker health  |                            |
| Disclosure 403-7                      | Prevention and mitigation of occupational health and safety impacts directly linked by business relationships                 |                            |
| Disclosure 403-8                      | Workers covered by an occupational health and safety management system  |                            |
| Disclosure 403-9                      | Work-related injuries   |                            |
| Disclosure 403-10                     | Work-related ill health   |                            |
| <b>Training and Education</b>         |   |                            |
| Disclosure 404-1                      | Average hours of training per year per employee   | Page 10 – 13               |
| Disclosure 404-2                      | Programs for upgrading employee skills and transition assistance programs   |                            |

| <b>GRI Standard</b>                                     | <b>Disclosure Title</b>  | <b>Page Reference &amp; Remarks</b> |
|---|--|-------------------------------------|
| Disclosure 404-3  | Percentage of employees receiving regular performance and career development reviews                           | Page 10 – 13                        |
| <b>Diversity and Equal Opportunity</b>                  |  |                                     |
| Disclosure 405-1  | Diversity of governance bodies and employees   | Page 10 – 13                        |
| <b>Non-discrimination</b>                               |  |                                     |
| Disclosure 406-1  | Incidents of discrimination and corrective actions taken   | Page 10 – 13                        |
| <b>Freedom of Association and Collective Bargaining</b> |  |                                     |
| Disclosure 407-1  | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | None.                               |
| <b>Child Labor</b>                                      |  |                                     |
| Disclosure 408-1  | Operations and suppliers at significant risk for incidents of child labor                                      | None.                               |
| <b>Forced or Compulsory Labor</b>                       |  |                                     |
| Disclosure 409-1  | Operations and suppliers at significant risk for incidents of forced or compulsory labor                       | None.                               |
| <b>Rights Of Indigenous Peoples</b>                     |  |                                     |
| Disclosure 411-1  | Incidents of violations involving rights of indigenous peoples   | None.                               |
| <b>Local Communities</b>                                |  |                                     |
| Disclosure 413-1  | Operations with local community engagement, impact assessments and development programs                        | Page 10 – 13                        |
| Disclosure 413-2  | Operations with significant actual and potential negative impacts on local communities                         |                                     |
| <b>Customer Privacy</b>                                 |  |                                     |
| Disclosure 418-1  | Substantiated complaints concerning breaches of customer privacy and losses of customer data                   | Page 8 – 9                          |
| <b>Socioeconomic Compliance</b>                         |  |                                     |
| Disclosure 419-1  | Non-compliance with laws and regulations in the social and economic area                                       | Page 8 – 9                          |

