



OIO Holdings Limited

SUSTAINABILITY REPORT 2021

BOARD STATEMENT

The Board of Directors (the “**Board**”) of OIO Holdings Limited (“**OIO**” or the “**Company**” and together with its subsidiaries, the “**Group**”) is pleased to present its third sustainability report (the “**Report**”) for the financial year ended 31 December 2021 (“**FY2021**”).

This Report provides an overview of the Group’s approach and commitment towards the management of environmental, social and governance (“**ESG**”) risks and opportunities. The Board believes this Report is an important avenue to engage with its stakeholders to understand their needs and concerns, and ensure continuous improvement in different ESG aspects.

In FY2021, the Group further enhanced its capabilities and accelerated its growth, in particular the blockchain agency and consulting services, as well as staking services. Through the acquisition of Moonstake Pte Limited and Moonstake Limited (collectively referred to as “**MS Group**”) in May 2021, the Group has been providing business-to-consumer (“**B2C**”) crypto wallet to users and staking¹ services, which utilise the Proof of Stake (“**PoS**”) mechanism to validate blockchain transactions. Avoiding the power consumption and computing power cost used in mining, the PoS is a more environmental-friendly method as compared to other validation methods such as Proof of Work (“**PoW**”), which is used for other cryptocurrencies.

The Group is committed to incorporating corporate social responsibilities into its business operations by enhancing its sustainability management and performance, as well as contributing back to the environment and the community. The Board accepts full responsibility for the sustainability of the Group, including formulating strategies, overseeing the Group’s ESG performance and relevant risks, and approving the sustainability report. The Board also regularly reviews the effectiveness of the risk management systems and internal control mechanisms, ensures that the Group remains compliant with regulatory requirements, operates on a sustainable basis in the long term, and continuously strives to enhance its economic, environmental, social and community commitments. The Group has also assigned personnel from the business and functional departments to support the Board to fulfill its responsibilities, which demonstrates the Group’s commitment to sustainability with transparency and accountability.

During FY2021, the Group conducted the materiality assessment, which helps the Group to not only identify material ESG issues that may be relevant and impactful to its business and its stakeholders, but also integrate ESG into its business strategy and improve its reporting. Based on the result of the assessment, Privacy and Data Security, Human Capital Development, and Economic Performance are the material ESG issues of the Group. To better manage the Group’s ESG performance and align with the market trend, the Group has set environmental and social targets according to its own business operations and its peer performance.

¹ Staking is a technical feature of blockchain technologies which utilises PoS as a validation mechanism by rewarding token holders who had staked their tokens for the validation process. A staking pool aggregates digital assets from multiple token holders to increase the token holders’ likelihood of receiving the blockchain validation rewards under the PoS system. The MS Group provides a proprietary software platform, including a user-friendly web wallet and mobile wallet services, in order to provide a full range of staking functions, and to serve a larger pool of tokens for holders to stake the cryptocurrencies they hold.

PoS produces and validates new blocks in blockchains through the process of staking, allowing new blocks to be produced without relying on specialised mining hardware. While mining requires a significant investment in hardware, under staking, holders participate in generating a block by delegating the cryptocurrencies they already hold.

In 2021, the Intergovernmental Panel on Climate Change issued a report² warning that irreversible and unprecedented changes to the planet are being caused by climate changes. The Group's principal operations are in Singapore; Singapore has committed to net zero emissions and mandated a Task Force on Climate-Related Financial Disclosures ("**TCFD**"). The Group seeks to develop a climate-resilient portfolio through collaborative efforts in addition to improving the overall sustainability of the built environment. During FY2021, the Group has included climate reporting with reference to the TCFD recommendations to report climate-related risks and challenges more effectively, and help the Group improve in this critical area.

The Board would like to express its sincere appreciation to its employees, customers and business partners for their continuous support. Moving forward, the Group will continue to work towards a more sustainable future through active collaboration with its stakeholders.

OIO Holdings Limited's Board of Directors

² IPCC Sixth Assessment Report "Climate Change 2021: The Physical Science Basis". <https://www.ipcc.ch/report/ar6/wg1/>

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ABOUT OIO HOLDINGS LIMITED

Listed on the Catalist Board of the Singapore Exchange Securities Trading Limited (the “SGX-ST”), OIO is a Singapore-based company that specialises in the provision of blockchain agency and consulting services, staking services and mechanical & electrical (“M&E”) engineering services.

The principal activities of the Group are:

- (a) **Management services** segment relates to provision of contract work management and fulfilment services;
- (b) **Blockchain agency and consulting services** segment relates to sales agency services to blockchain companies in respect of their blockchain-related products and services, software development outsource agency services to blockchain companies in respect of their software development projects, consultancy services to blockchain companies in respect of the strategy, sales and marketing, technology and operation of their blockchain-related businesses, products and services and commercialisation of blockchain-related products; and
- (c) **Staking services** relate to provision of digital wallets and staking services to retail customers as well as research and development services to enterprise customers in relation to their staking and decentralized finance businesses;
- (d) **M&E engineering services** segment relates to provision of solutions and services in fire protection systems, plumbing and sanitary systems, and heating, ventilation and air-conditioning systems; and management services related to provision of contract work management and fulfilment services.

Following the expansion of business to the blockchain space in FY2020, the Group has further enhanced its blockchain capabilities and accelerated its growth in FY2021 through initiatives such as the acquisition of MS Group in May 2021. The Company provides staking services, which utilise the PoS mechanism to validate blockchain transactions.

ABOUT THIS REPORT

REPORTING SCOPE

This Report presents the Group's sustainability performance for the period between 1 January 2021 and 31 December 2021. Unless otherwise specified, the scope of this Report covers the activities and projects that the Group has direct operational control in all of the Group's segments in Singapore, where its headquarters is situated in. As the Group has expanded its business of blockchain agency and consulting services, and staking services through the acquisition of MS Group in May 2021, the staking services segment has become one of the main business contributors to the Group's revenue, of which the sustainability data of the said segment has been included in this Report. During FY2021, the Group also acted as the subcontractor for the M&E engineering projects, therefore the usage of environmental resources in such projects, including but not limited to electricity and water, was not included in this Report since the Group did not have direct operational control over such usage.

The reporting scope reflects the scale of the Group's operations and the significance of the Group's economic, governance, environmental and social impacts. This Report also presents and summarises the Group's policies, practices, performance, and initiatives relating to the ESG aspects, as well as its ESG strategies. The Group will continue to strengthen its sustainability works in the future and to improve its scope of disclosure subject to the materiality assessment outcome and necessity.

REPORTING FRAMEWORK

This Report has been prepared in accordance with the Global Reporting Initiative ("GRI") Standards: Core Option. Similar to the Group's previous sustainability reports, the Group continues to choose the GRI Standards for its longstanding universal application and robust guidance, which allows for comparability of the Group's performance against its peers.

The Group attaches great importance to accuracy, balance, clarity, comparability, reliability, timeliness during the preparation for this Report, the Group has applied these GRI's reporting principles as the following:

Accuracy: The Group confirms that the information contained in this Report is accurate and complete in all material respects and not misleading or deceptive. The Board has reviewed and approved this Report.

Balance: This Report aims to present a holistic and fair view of the sustainability performances of the Group. On this account, the Board and the designated personnel of various departments/business units were involved in the reporting process.

Clarity: The methodologies and applicable assumptions used in the calculation of the materiality topics' key performance and relevant data in this Report were supplemented by explanatory notes to establish benchmarks where feasible. Graphics, tables and charts are used for clearer and understandable presentation of the information in this Report to all the stakeholders.

Comparability: The statistical methodologies applied to this ESG Report were substantially consistent with the previous year, and explanations were provided regarding data with changes in the scope of disclosure and calculation methodologies. If there are any changes that may affect comparison with previous reports, the Group will add explanatory notes to the corresponding content of this ESG Report.

Reliability: This Report is undergone the Group’s internal assurance process, and approved by the Board, which further enhanced the quality and materiality of the Group’s sustainability performances and information.

Timeliness: This Report is issued within 5 months of the end of the Group’s financial year, that is on a regular schedule and made it available in time for users to make informed decisions.

This Report also involves climate-related disclosures based on the TCFD recommendations, and complies with the Practice Note 7F Sustainability Reporting Guide in the Catalist Rules issued by the SGX-ST.

CONTACT US

The Group welcomes feedback to continuously improve its sustainability reporting and practices. If you wish to provide comments or feedback, please send your feedback to enquiry@oio.sg.

SUSTAINABILITY GOVERNANCE

The Board has overall responsibility for the sustainability strategy, management, performance and reporting of the Group. The Board is responsible for overseeing all ESG-related matters, including identification, evaluation and management of the ESG factors, sustainability risks and related opportunities. The Board is also responsible for setting targets and goals, and ensuring effective risk management and internal controls.

Furthermore, the Board has delegated the responsibility of overseeing the management and monitoring of the material ESG issues to the designated personnel from the business and functional departments of the Group. Designated personnel work closely with the Board to establish the Group's sustainability objectives and strategies, monitor the Group's ESG performance, prioritise material ESG issues and review ESG policies. Designated personnel are also responsible for collecting and analysing relevant ESG data. In addition, the designated personnel reports periodically to the Board for the assessment and identification of ESG risks and the subsequent implementation or revision of the Group's ESG strategies.

STAKEHOLDER ENGAGEMENT

To better understand sustainability issues faced by all the stakeholders, the Group values their opinions and feedback, as well as their expectations and concerns on economic, governance, social, and environmental issues, by building a strong relationship and communication channels with its stakeholders. These help the Group to identify the materiality impact to the stakeholders, so as to formulate strategies and sustainability measures accordingly and appropriately. The Group maintains close communication with its stakeholders that have significant impacts on the Group's business and also those who are affected by the Group's operations.

Stakeholders' expectations have been taken into consideration by utilising diversified engagement methods and communication channels as shown below:

Stakeholders	Expectations and Concerns	Engagement Methods	Frequency
Government and Regulatory Authorities	<ul style="list-style-type: none"> Compliance with laws and regulations Compliance with industry standards and guidelines Privacy and Data Security Business Ethics 	On-site visits	Year-round
		Written and/or electronic correspondences	
Investors and Shareholders	<ul style="list-style-type: none"> Economic performance Transparent disclosure Sound corporate governance practices Long-term growth of the business Privacy and Data Security 	Updates of financial results and announcements, business developments, press releases, ESG reports and other relevant disclosures via SGXNet and the Group's website	Year-round
		Annual/Extraordinary General Meetings	Annually/as and when
Customers	<ul style="list-style-type: none"> High-quality products and services 	On-site visits	Year-round
		Email and customer service	

Stakeholders	Expectations and Concerns	Engagement Methods	Frequency
Government and Regulatory Authorities	<ul style="list-style-type: none"> • Compliance with laws and regulations • Compliance with industry standards and guidelines • Privacy and Data Security • Business Ethics 	On-site visits	Year-round
		Written and/or electronic correspondences	
		hotline	
Employees	<ul style="list-style-type: none"> • Attractive remuneration package • Good employment practices • Safe and healthy work environment • Human Capital Development 	Training and development programmes	Year-round
		Regular meetings	Annually
		Performance appraisals	
Contractors and Suppliers	<ul style="list-style-type: none"> • Equitable treatment • Good supply chain management • Fair and open selection • Business Ethics 	Established channels of communication	Year-round
		Site visits	
Society, non-governmental organisations and media	<ul style="list-style-type: none"> • Compliance with laws and regulations • Privacy and Data Security • Business Ethics 	Updates of financial results and announcements, business developments, press releases, ESG reports, and other relevant disclosures via SGXNet and the Group's website	Year-round

MATERIALITY ASSESSMENT

To identify and prioritise the Group's material ESG topics to its business operation, materiality assessment was conducted via distributing a materiality assessment survey, which was designed with the consideration of industry best practices, global and local emerging sustainability trends and sustainability reporting frameworks. The survey was distributed to the Group's relevant stakeholders, including government and regulatory authorities, investors and shareholders, customers, employees, and contractors and suppliers.

During FY2021, the Group had conducted the materiality assessment survey to identify the material ESG issues that are relevant and impactful to its business and its stakeholders. The specific steps that the Group has taken are as follows:

Identification of ESG issues

With the reference to the nature of the Group, identify the list of ESG issues using the previous materiality assessment results, management inputs and guidelines such as GRI Standards.

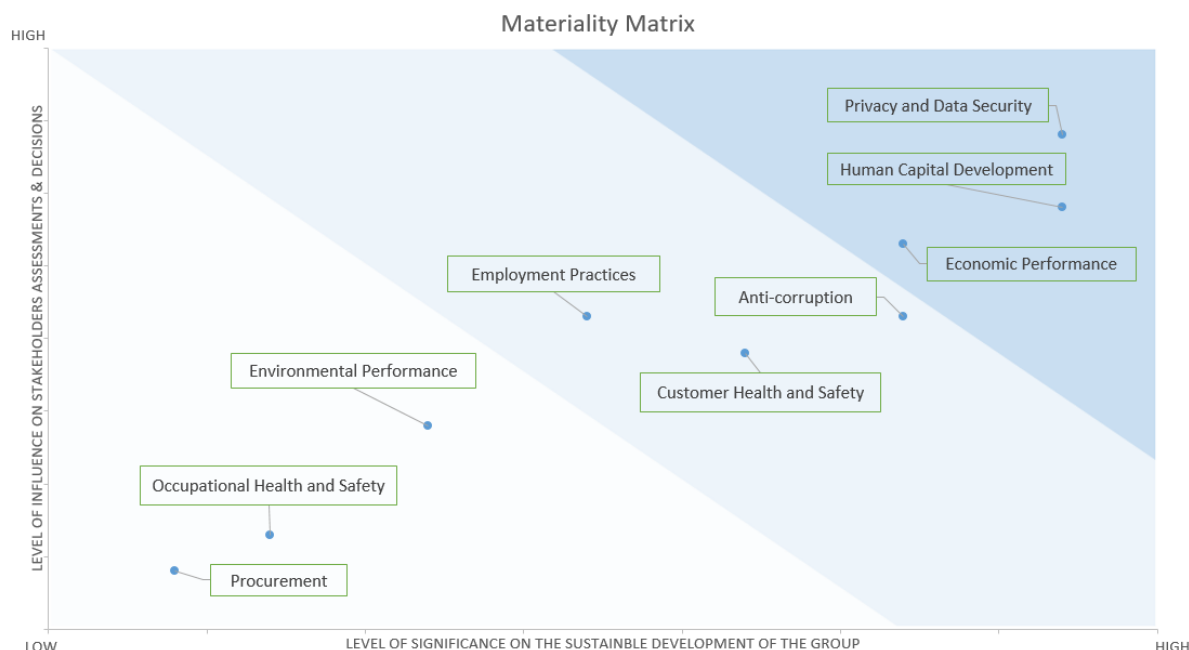
Materiality Assessment

Design a materiality assessment survey, and invite stakeholders to assess the importance of the issues, and express their views on the Group's ESG aspects through open-ended questions.

Analysis and Materiality Matrix

Analyse the result received from the survey responses and prepare the materiality matrix; and
Review the stakeholder opinions and materiality assessment results, discuss with management and determine the focus of the report disclosure, and the strategies for improving ESG performance in the future.

The Group will continue to monitor its business operations and ESG performances regularly in order to address and manage the ESG issues that are important to the business and the stakeholders. The Group's materiality matrix for FY2021 is presented as follows:



Category	Material Topics	Impacts and Boundaries
Economic	Economic Performance	Group Level
Governance	Anti-corruption	Group Level
Environment	Environmental Performance	Group Level
Social	Employment Practices	Group Level
	Human Capital Development	Group Level
	Occupational Health and Safety	M&E Engineering Services
	Privacy and Data Security	Staking Service
	Customer Health and Safety	M&E Engineering Services
	Procurement	Group Level

The result of the materiality assessment survey was reviewed and material ESG issues were approved by the Board. Performance measurements of the identified material ESG issues will be shared in detail in the following sections of this Report. The Group makes use of the collected ESG data and performances over the years, as well as peer benchmarks, to establish sustainability targets and management measures in pursuit of the sustainability.

The Group confirmed that appropriate and effective management policies and internal control policies for the ESG issues are in place.

ECONOMIC

The Group sees economic performance as a material issue to the Group as business economic viability is important not only to the Group but also its stakeholders. The Group aims to deliver sustainable economic performance coupled with good corporate governance practices and high ethical standards. The Group's financial performance for FY2021 can be found in the "Financial Highlights" on page 9 and "Financial Statements" on page 45 to 121 of the Group's annual report 2021.

GOVERNANCE

To achieve high standards in corporate governance and gain trust from all the stakeholders, the Group has established a sound system for risk management and internal control to ensure both its tangible and intangible assets are protected, as well as ensuring that operation controls are adequate to minimise its business risk. The audit committee of the Group (the "**Audit Committee**") has the formal responsibility for and oversight of the implementation and monitoring of such system.

ANTI-CORRUPTION

The Group understands that integrity, honesty and fairness are fundamental to their business operation and emphatically affirms its zero-tolerance policy regarding any forms of corrupted activities. The Group has established the Anti-bribery and Corruption Policy which sets out its zero-tolerance approach to bribery and corruption. All employees, the Board of the Group, the Group's suppliers, contractors or other business partners are required to comply with this policy, and not engage in any form of bribery or corruption.

The policy provides guidelines which include basic principles such as compliance with anti-bribery and corruptions laws, rules and regulations of Singapore and other jurisdictions where it conducts its business, avoid conflicts of interest and report any illegal and unethical behaviour. A violation of the policy will lead to disciplinary action and may include dismissal, and reporting to the relevant authorities, if necessary.

The Group has ensured that the Anti-bribery and Corruption Policy is communicated clearly to all its employees, including its 7 management-level employees and 6 other general employees, which make up 100% of the Group's total employees in FY2021.

Whistle-blowing Policy

The Group has established a Whistle-blowing Policy which sets out a detailed reporting and investigative procedure to encourage and provide a confidential platform for employees to raise serious concerns as well as report fraudulent activities internally so the Group may address and investigate potential inappropriate conduct and actions. Any concerns on violations of the Group's ethics and code of conduct, or suspected violation of law or regulations that govern the Group operations can be reported if done in good faith.

Employees may also report work-related hazards and/or hazardous situations. All concerns will be treated with strict confidentiality. The Group is committed to protecting the whistle-blower from common concerns such as victimisation, harrassment or discrimination. Therefore, any employee reporting a genuine concern in good faith under the policy shall be assured of the protection against unfair reprisal, even if the reports are subsequently proved to be frivolous.

In FY2021, there were neither confirmed incidents of corruption nor public legal cases regarding corruption brought against the Group, nor any termination of contracts with business partners due to violations related to corruption. The Group did not identify any material non-compliance with relevant anti-corruption laws and regulations, hence, achieving the target set out during FY2020. Moreover, there was no confirmed incidents where contracts with business partners were terminated or not renewed due to violations related to corruption and no public legal cases regarding corruption brought against the organisation or its employees during FY2021. The Group aims to maintain this goal for the forthcoming year.

More details of the Group's corporate governance practices can be found in the "Corporate Governance Report" of the Group's annual report 2021.

ENVIRONMENTAL

In FY2021, the Group continued its commitment to prevent the exploitation of natural resources whenever possible in its daily operations and improve their energy efficiency. To minimise the environmental impact arising from the business operation, the Group has formulated green practices which are formally documented in the Safety and Green Management Assessment System Manual. Green practices adopted by the Group are described in the relevant sub-header such as greenhouse gas, energy management and water management within this environmental aspect. Looking forward, the Group aims to expand the scope of environmental disclosure when the data collection system becomes more mature.

During FY2021, the Group did not identify any material non-compliance with relevant environmental laws and regulations that would have a material impact on the Group, hence, achieving the target set out during FY2020. The Group aims to maintain this record of zero incidents of non-compliance for the forthcoming year.

The Group also recognises the importance of environmental sustainability. Therefore, apart from its own operation, the Group is also encouraging the sustainable practice of its clients. The Group provides staking services which relate to provision of digital wallet and staking services to retail customers, as well as research and development services to enterprise customers in relation to their staking and decentralized finance businesses. Staking is a technical feature of blockchain technologies which utilises PoS mechanism to validate blockchain transactions in the staking services, and is a more environmentally friendly method as compared to other validation methods such as PoW, as the amount of energy used for computing is lesser.

CLIMATE CHANGE MITIGATION AND ADAPTATION

Extreme weather events are becoming more frequent and severe and tackling climate change has become a global consensus over recent years. The Group also realised that many countries including Singapore have begun to commit to reducing its carbon emission footprint over the past year by setting a clear timeline to achieve net zero emissions. Acknowledging this global trend, the Group is committed to gradually implementing the recommendations of the TCFD, by aiming to build long-term resilience and to do its part to support the transition towards a low-carbon economy.

Governance and Risk Management

The review of climate-related risks is part of the Group's enterprise risk management framework, which is overseen by the Board. More details of the Group's established risk governance and reporting structure can be found in the "Corporate Governance Report" on pages 12 to 33 of the Group's annual report 2021. The Group works with its business partners and stakeholders to keep abreast of the latest trends in climate adaptation and mitigation such as policy changes and technological developments. In addition, the Group engages with its key stakeholders to understand their expectations so as to ensure the Group's material climate-related risks are identified and managed through the forementioned practices.

Physical Risks

Increased frequency and severity of extreme weather events locally such as extreme heat and flash floods can disrupt business operations by damaging the power grid and communication infrastructures, hampering and injuring the Group's employees on the way to work or during their work. These events could disrupt supply chains, interrupt business operations, and damage the Group's assets. For instance, there is shortage in supply of semiconductors and electronic parts required for equipment, power outage affecting the operation of data centre, damage of computers and appliances in data centre due to extreme weather events, etc. As a countermeasure, the Group shall identify these risks and prioritise those with severe impact to take precautionary and contingency measure first, while concurrently explore ways in which a change in business model is possible to mitigate or avoid this severe impact on business operations.

Transition Risks

There are more stringent climate legislations and regulations to support global vision for decarbonisation. For example, the Singapore Exchange ("SGX-ST") has required that listed companies to enhance the climate-related disclosures in their ESG reports, and the climate reporting is becoming gradually mandated by industries. Stricter environmental laws and regulations may expose enterprises to higher risks of claims and lawsuits. Corporate reputation may also be damaged due to failure to meet the compliance requirements for climate change. The Group's related capital investment and compliance costs thus increase. In response to the policy and legal risks as well as the reputation risks, the Group regularly monitors existing and emerging trends, policies and regulations relevant to climate and prepares to alert the top management where necessary to avoid cost increments, non-compliance fines or reputational risks due to delayed response.

Opportunities

Climate change also creates business opportunities for the Group, which may incorporate environmental considerations into its business strategy. With increasing awareness of climate-related risks, both customers and investors are concerned over the creation of a sustainable future as well as sustainability efforts adopted by the Group. For this, the Group has chosen to adopt staking services that utilise PoS mechanism instead of the PoW method. By utilising PoS mechanism to validate blockchain transactions, the Group takes the business opportunities in developing a more environmentally friendly method for validation of blockchain transaction, with a lower electricity consumption due to the unnecessary of complicated computing. With a more environmentally friendly business model, the Group is able to attract more environmentally conscious consumers and investors by implementing different carbon reduction initiatives and measures in the operations and along the supply chain.

Greenhouse Gas (“GHG”) Emissions

In committing to reduce GHG emissions, the Group has actively implemented measures for energy conservation, which will be described in the section headed “Energy Consumption”.

During FY2021, the principal sources of GHG emissions were generated from diesel consumption of the Group’s lorry (Scope 1) and the use of purchased electricity (Scope 2). During FY2021, the Group’s total GHG emissions intensity decreased approximately by 60.28%, compared to that in FY2020. This is due to the expansion of the Group’s business with limited environmental impact, especially the staking services, as well as lesser activities from M&E engineering business which has a higher carbon emission footprint. However, the Group will continue its effort in mitigating the GHG emissions in the forthcoming year.

Summary of the Group’s GHG emissions performance:

Indicator ³	Unit ⁴	FY2021	FY2020	FY2019
Scope 1 – Direct GHG Emissions • Diesel	kgCO ₂ e	11,119.06	7,434.39	N/A ⁵
Scope 1 Intensity	kgCO ₂ e/thousand revenue (S\$) ⁶	2.21	5.07	N/A
Scope 2 – Indirect GHG Emissions • Purchased electricity	kgCO ₂ e	2,926.99	2,910.97	7,045.81
Scope 2 Intensity	kgCO ₂ e/thousand revenue (S\$)	0.58	1.98	7.01
Total GHG Emissions	kgCO₂e	14,046.05	10,345.36	7,045.81
Total GHG Emissions Intensity	kgCO₂e/thousand revenue (S\$)	2.80	7.05	7.01

Note(s):

- GHG emissions data is presented in terms of carbon dioxide equivalent and is based on, but not limited to, “The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standards” issued by the World Resources Institute and the World Business Council for Sustainable Development and the latest Electricity Grid Emission issued by the Energy Market Authority of Singapore.
- kgCO₂e is defined as kilogrammes of carbon dioxide equivalent, the use of unit is consistent with that of the previous year.
- Data on the diesel consumption of the Group’s lorry has been included since FY2020 due to the more mature data collection system. Therefore, a direct comparison between the Scope 1 emissions and its intensity of FY2019 and other years is not available.
- For FY2021, the Group recorded a revenue of S\$5,021,534 (FY2020: S\$1,467,560). This data is used for calculating other intensity data.

ENERGY CONSUMPTION

Energy consumption is one of the notable environmental footprint that the Group uses for its business operation. Thus, the Group strives to reduce energy consumption and enhance energy efficiency where possible. Anomaly in electricity consumption will be investigated to find out the root cause and preventive measures will be taken. Therefore, the Group has adopted the following energy-saving measures to better govern the use of energy within the Group’s operation, these include:

- Switch off all idle appliances and unnecessary lightings upon leaving the Group’s premise;
- Purchase equipment with high energy efficiency on the replacement of old equipment;
- Explore energy-efficient technologies (such as using LED lights instead of fluorescent lighting fixtures) to implement in operations; and
- Where possible, track energy consumption on-site, this will enable strategies on reducing energy consumption to be set.

During FY2021, the total energy consumption intensity of the Group decreased by approximately 59.11%, compared to that during FY2020. This can be explained by the expansion of the Group’s business with limited environmental impact, especially the staking services. The Group will continue its effort in mitigating the energy consumption for the forthcoming year.

Summary of the Group’s energy consumption performance:

Types of Energy ⁷	Unit	FY2021	FY2020	FY2019
Direct Energy Consumption <ul style="list-style-type: none"> • Diesel 	kWh	43,274.68	28,934.16	N/A ⁸
Direct Energy Consumption Intensity	kWh/thousand revenue (S\$)	8.62	19.72	N/A
Indirect Energy Consumption <ul style="list-style-type: none"> • Purchased electricity 	kWh	7,174.00	7,126.00	17,248.00
Indirect Energy Consumption Intensity	kWh/thousand revenue (S\$)	1.43	4.86	17.17
Total Energy Consumption	kWh	50,448.68	36,060.16	17,248.00
Total Energy Consumption Intensity	kWh/thousand revenue (S\$)	10.05	24.58	17.17

Note(s):

7. Conversion factor for diesel in litres to energy consumed is based on the Energy Statistics Manual issued by the International Energy Agency.
8. Data on the diesel consumption of the Group’s lorry has been included since FY2020 due to the more mature data collection system. Therefore, a direct comparison between the diesel consumption and its intensity of FY2019 and other years is not available.

Apart from internal operations, the Group promotes energy conservation externally by providing staking services using PoS. PoS tackles the issues of power consumption and computing power cost by avoiding mining, which is computational work required to verify blocks and transactions under PoW mechanism. Instead, cryptocurrency owners can stake their own crypto coins to gain staking rewards. Therefore, huge amount of electricity for computing is prevented. This helps to promote the sustainable development of the cryptocurrency industry.

WATER MANAGEMENT

The principal usage of water resources are mainly general use by employees in the offices and for sanitary purposes. The Group relies on the fresh municipal water supply, therefore the Group does not encounter water stress issues such as sourcing water. Similarly, used water is discharged through the municipal sewage network.

Despite the Group’s water consumption is immaterial, the Group is determined to enhance water

conservation. The Group has strengthened its employees' awareness of water conservation by posting reminders around the offices, reminding employees to minimise the use of water. The Group also performs regular inspections of water taps to prevent leakage. Low-flow aerators and dual-flush water cistern are installed on faucets and in toilets respectively in washrooms where possible.

During FY2021, total water withdrawal intensity decreased by approximately 91.67%, compared to that during FY2020. This can be explained by the expansion of the Group's business with limited environmental impact, especially the staking services, and the significant improvement of employees' awareness in water conservation.

Summary of the Group's water withdrawal performance:

Indicator	Unit	FY2021	FY2020	FY2019
Total Water Withdrawal	m ³	25.00	94.50 ⁹	35.70
Total Water Withdrawal Intensity	m ³ /thousand revenue (S\$)	0.005	0.06	0.04

Note(s):

- The significant increase in water withdrawal in FY2020, compared to FY2019, was mainly due to the adoption of water-intensive practices for general cleaning and maintaining personal hygiene amidst the COVID-19 pandemic as well as the fact that the staff working in the blockchain business segment work in the office more frequently than the staff working in the M&E engineering business segment.

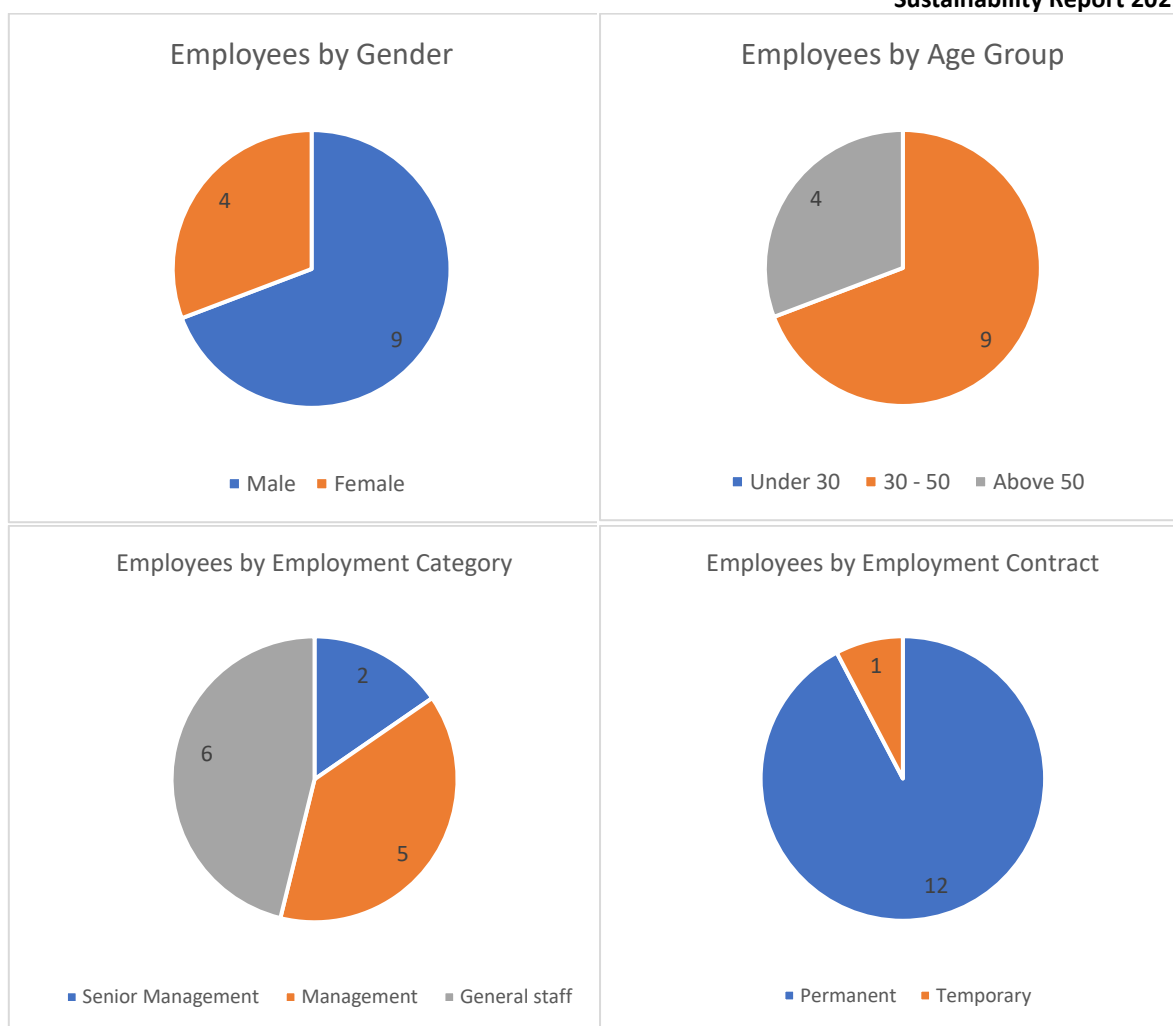
SOCIAL

The Group has long maintained a conscious effort in ensuring compliance on socioeconomic aspects, which is crucial to being successful. Apart from setting up clear policies and procedures in advance to prevent potential infringement of related laws and regulations, the management of the Group also conducts regular reviews of these policies to revise and update them where necessary. Employees are encouraged to report any suspected cases of violation in laws and regulations. In FY2021, the Group did not identify any material non-compliance with relevant material socio-economic laws and regulations, hence, achieving the target set out in FY2020. The Group aims to maintain this target for the forthcoming year.

EMPLOYMENT PRACTICES

The Group acknowledges that the human resources is fundamental to its continuous development and therefore recognises the contribution and dedication of its employees. Employment policies are formally detailed in the Human Resources Policy Manual such that their rights are respected and protected. The Group also periodically reviews these policies and employment practices to ensure compliance with statutory standards, continuous improvement of its employment standards and practices and competitiveness against companies within industry.

During FY2021, the Group employed a total of 13 full-time employees working in Singapore. All activities of the Group were performed by the Group's employees. The following graphs show the breakdown of the Group's employees by gender, age groups, employment category, and employment contract:



During FY2021, the Group's overall turnover rate¹⁰ is approximately 30.77% and the rate of new hires¹⁰ is approximately 69.23%. All the turnover and new hires are in Singapore.

The breakdown of turnover and new hires during FY2021, by gender and age group:

Categories	Number of turnover	Turnover rate	Number of New Hires	Rate of new hires
By Gender				
Male	3	23.08%	7	53.85%
Female	1	7.69%	2	15.38%
By Age Group				
Less than 30	-	-	-	-
30 – 50	4	30.77%	8	61.54%
Above 50	-	-	1	7.69%

Note(s):

10. The overall turnover rate is calculated by the number of employees who left during FY2021 divided by the total number of employees at the end of FY2021.

The rate of new hires is calculated by the number of new hires during FY2021 divided by the total number of employees at the end of FY2021

Recruitment and Remuneration

Employees are recruited based on their merits and potential under a robust and transparent recruitment system. Recruitment and promotional decisions are made independent of race, national origin, marital status, religion, political affiliation, age, sexual orientation and disability. The Group has set a series of terms and conditions, regarding to rights and obligations imposed on its employees as specified in the letter of employment, including salary increments, working hours and rest days, etc. All personal data of the employees and job applicants are safeguarded under the Group's Data Protection Policy. Unauthorised access, collection, use, disclosure, copying, modification, disposal or similar process are prohibited.

In addition to the leave entitlement stipulated in the Employment Act of Singapore, the Group is flexible in granting of leave to cater the needs of its employees. This includes marriage leave, examination leave, compassionate leave, etc. Employees are also entitled to other non-occupational medical and healthcare benefits such as outpatient medical and dental benefits. For employees who fall sick or require medical attention during working hours, employees are entitled to medical attention at the Group's appointed clinic. Outside of working hours, the employee shall consult a doctor at a government out-patient dispensary or any registered medical practitioner nearest to his residential address. Such medical certificate shall be recognised and the related medical fee shall be reimbursed upon production of the medical receipt. Employee benefits are clearly stated in the Human Resources Policy Manual.

Diversity and Equal Opportunity

The Group commits its focus on equality, inclusion and diversity through maintaining a discrimination-free talent pool and work environment, where all employees are treated with the same degree of respect. The Group endeavours to instill a cooperative and collaborative workplace culture into all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training. Employees are strongly encouraged to report any suspected cases to protect the rights and interests of each employee. Any forms of sexual harassment or abuse in the workplace will not be tolerated.

During FY2021, there were no incidents of non-compliance relating to discrimination, forced labour, child labour or freedom of association. The Group aims to maintain its current good practices of having zero related breach or incidents to continuing attracting high calibre employees in the forthcoming year.

HUMAN CAPITAL DEVELOPMENT

The Group believes that well-trained employees are the foundation of the Group's professional service. In providing consultancy and solutions to clients in M&E engineering services, blockchain services and staking services, employees are taught the fundamental skills of the industry and the latest industry practices to provide customised and professional services to the client. For the staking service, all employees are not only trained with the technical skills, but also fully equipped with the responsibility for risk and compliance in the cryptocurrency transaction, in particular anti-money laundering, tax treatment and wallet operation. The Group has provided training and professional development programmes to all its employees, either internal on-job trainings or external trainings conducted by accredited institutions or organization, where applicable. The Group targets to improve the average training hours of its employee, to ensure all employees are sufficiently trained.

OCCUPATIONAL HEALTH AND SAFETY

The Group prioritises its occupational health and safety as the M&E engineering services of the Group's business presents a level of risk. Therefore, the Group attaches great importance to providing a safe and secure workplace for its employees, customers and visitors. During FY2021, the Group did

not record any workplace fatalities nor any high-consequence work-related injuries, achieving the target set out during FY2020. The Group aims to maintain the same record of zero workplace fatalities or high-consequence work-related injuries for the forthcoming year.

Occupational Health and Safety Management System

The two subsidiaries – Acmes-Kings Corporation Pte Ltd¹¹ and DLF Engineering Pte Ltd – pertaining to the M&E engineering services segment are certified with bizSAFE Level Star and bizSAFE Level 3 respectively. BizSAFE is a nationally recognised capability building programme designed to help companies build workplace safety and health capabilities. The current bizSAFE levels attained by the respective subsidiaries signify that a system to manage workplace risks has been put in place, that the subsidiaries are in compliance with Workplace Safety and Health (Risk Management) Regulations and that an approved and independent auditor has been engaged to assess the implementation of risk management in the workplace. Furthermore, DLF Engineering Pte Ltd has completed the Safety and Green Management Assessment Scheme for Electrical Engineering Works as part of the requirement under the Singapore List of Trade Subcontractor's registration.

A Safety and Green Management Assessment System has been set up by the Group and was implemented under the requirement of the Workplace Safety and Health Act and based on the International Organisation for Standardisation ("ISO"). The details and functions are stated in the Safety and Green Management Assessment System Manual ("**SGMAS Manual**"), which covers all workers under the M&E engineering services segment and informs all employees of the minimum safety standards as stipulated by relevant local legislations. The SGMAS Manual is reviewed by top management and other relevant personnel at least once a year and whenever there are any changes in legislation or internal procedures. The Environmental, Health, Safety and Security Policy is also incorporated in the comprehensive SGMAS Manual, setting out the management approach and commitment towards health and safety in clear terms.

The SGMAS Manual is communicated to all employees in languages understood by them, with the intention of ensuring all employees are aware of their individual environmental, health, safety and security obligations. Employees are encouraged to voice their opinion on the evaluation of the existing occupational health and safety management system and report any unsafe work conditions to their supervisors immediately.

Hazard Identification, Risk Assessment and Incident Investigation

Risk assessment is conducted for each project to identify hazards, evaluate risks and propose risk control measures to ensure the health and safety of the Group's employees. Under the Workplace Safety and Health (Construction) Regulations 2007, the permit-to-work ("**PTW**") system is applicable to the classified high-risk construction work activities. A formal risk assessment in accordance with the SGMAS Manual is conducted before each of the said activities commence. The Project Manager, Safety (PTW) Assessor and Line Supervisor have been appointed to identify work-related hazards, assess risks and whether all reasonably practicable measures have been taken to ensure safety.

In addition, the SGMAS Manual specifies that employees should, under reasonable circumstances, remove themselves from work situations that could cause injury, ill health or reprisals. A safety inspection plan has also been developed with inspection frequency and person-in-charge clearly stated in the SGMAS Manual. Records of inspection and follow-up are maintained. Accidents, incidents, non-conformances are to be reported or recorded depending on the severity of the issues. Lessons learned and preventive and corrective action plans will be promulgated and discussed during occasions such as project co-ordination meetings, toolbox meetings and safety talks. An investigation of incident/accident flow chart is also detailed in the SGMAS Manual for easy reference.

Note(s):

11. Applied for voluntary creditors' liquidation on 21 February 2022

Provision of Occupational Health Services

Occupational health services are provided to all employees of the Group. Contact numbers of the external emergency services, medical facilities in close proximity to the Group's premises and the key emergency management team personnel are clearly stated and made available in the SGMAS Manual and at the Group's premises. Furthermore, sufficient and suitable first-aid facilities are available at the sites where the Group operates in. For non-occupational health services provided by the Group, please refer to the section headed "Recruitment and Remuneration".

Safety Training

The Group's workspaces are designed to be safe and secure with zero workplace fatalities and reducing workplace injury. Therefore, the Group focuses on providing adequate safety training for each employee, in which, an orientation training is provided to all new site supervisors, workers and employees on their first day of work. During the orientation training, safe work procedures, in-house rules and regulations, and the emergency response plan will be introduced. Personnel such as forklift drivers, scaffold erectors, signaller and riggers are legally required to attend and complete relevant mandatory safety training by the Ministry of Manpower of Singapore. Toolbox meetings are held daily to educate all workers on the relevant health hazards, safe working practices and proper use of personal protective equipment by line/ trade supervisors to all workers.

Employees are also required to attend internal and external occupational health and safety training to keep abreast of the evolving industry standards and best practices, and to ensure their own safety. During FY2021, apart from personnel that are legally required to complete relevant mandatory safety training as aforementioned, employees did not attend specific training courses due to the lower activity levels of the M&E engineering projects as well as due to the restrictions under the COVID-19 pandemic.

Response towards the COVID-19 pandemic and the variant virus

In the light of the prolonged COVID-19 pandemic, the Group has complied with the public health and safety measures from the Singapore government to help prevent the spread of the virus. In addition, the Group has implemented health and safety measures such as offering surgical masks and hand sanitisers to its employees in the offices. Clear guidelines are also in place to respond to situations where employees or their family members are found to have contracted the virus. Overall, the Group is committed to maintaining its current health and safety measures, to continue to safeguard its employees.

CUSTOMER HEALTH AND SAFETY

In line with the Group's mission to deliver high quality and efficient services, the Group is committed to properly execute stringent quality control to ensure that the project and other services provided comply with relevant regulations and fulfil the demand set by the Group's customers. The quality of projects is pertinent to the customers' health and safety, the Group's continued growth, reputation, and market standing. The Group has also established a quality management system that sets out the roles and responsibilities of different personnel and the procedures for quality monitoring and control. The management system is regularly reviewed to ensure continuous improvement in safeguarding the health and safety. During FY2021, the Group was not involved in any major incident regarding customer health and safety, achieving the target set out during FY2020. The Group aims to maintain this record for the forthcoming year.

PRIVACY AND DATA SECURITY

The Group prioritises the privacy protection and data security to maintain its sustainable business operation and sound reputation. To prevent any cyber breach and adherence to local requirements and best practices, the Group reviews cybersecurity risk and control measures, related policies and procedures periodically. During FY2021, the Group did not receive any complaints concerning cyber breach nor identified incident relating to cybersecurity of the Group. The Group aims to maintain the record of zero cyber breach or related incident for the forthcoming year.

To ensure and maintain all employees' awareness relating to cybersecurity, the Group has set a target to distribute related content pieces to its employees.

Customer Privacy

The Group endeavours to protect all sensitive information pertaining to its customers and to take reasonable measures to preserve the integrity of customers' data and prevent any loss of customers' data. The Group ensures that its employees have proper knowledge and support with regards to handling sensitive information.

The Group has also established and implemented internal control policies and procedures for access and handling of sensitive information. Data access is regularly monitored within the Group. Any internal access privileges to user data must be approved by senior managers and the Group does not share user data nor is the platform used for advertising.

To further safeguard the customers' personal data privacy and the Group's confidential information, employees of the Group are required to sign a Non-Disclosure Agreement. All sensitive information pertaining to customers is protected by taking reasonable measures to preserve the integrity of customers' data and prevent any loss of it or corruption. The Group ensures that its employees have proper knowledge and support, regarding to handling sensitive information.

The Group has also implemented and routinely upgrades its firewall, anti-virus, and anti-spam solutions, include virus scanning software, web filtering appliances and email filtering services on each of the Group's computers to prevent leakage of confidential information. Status of network and backups are reviewed regularly to maintain the secure Internet traffic. All data and documents are encrypted in transit and at rest in the Group's databases. All electronic communication between users and the Group's system occurs through high-grade encryption.

During FY2021, the Group did not receive any complaints concerning breaches of customer privacy nor any identified leaks, thefts, or losses of customer data, achieving the target set out during FY2020. The Group aims to maintain the record of zero received complaint for the forthcoming year.

PROCUREMENT

The Procurement Policy sets out the procedures for purchasing products and services to ensure that the Group's requirement is met. Apart from reviewing suppliers' basic information, the Group also considers the price offered, production and quality management system, possession of certifications, and compliance with relevant laws, regulations and standards during the supplier selection process. The Group evaluates and monitors the performance of its suppliers regularly to ensure their compliance with quality and service standards. Suppliers who fail to demonstrate good standards or fail to meet the Group's supplier selection criteria will be excluded from the list of suppliers for future engagements.

During the procurement process, the Group also factors in the environmental and social impact of its suppliers in the decision-making process. According to the green procurement guidelines in the Safety

and Green Management Assessment System (“**SGMAS**”) Manual, the Group will prioritise the selection of suppliers who give due consideration to managing and reducing its negative environmental and social impacts. The Group aims to maintain its robust procurement process to ensure product quality, while ensuring that the idea of sustainability is promoted further along its supply chain.

The suppliers of the Group provide, but are not limited to, part of its M&E projects, blockchain consulting projects, and staking services. During FY2021, all suppliers engaged by the Group has been reviewed through the said system and approximately 55.91% of the total procurement budget used for the reported business segments, which are regarded as significant locations of operation, was spent on local Singaporean suppliers.

SGX CONTENT INDEX

Primary Component	Section Reference
Material Topics	Materiality Assessment
Policies, Practices and Performance	<ul style="list-style-type: none"> Economic Governance Environmental Social
Board Statement	Board Statement
Targets	Under each material topic
Framework	About this Report – Reporting Framework

GRI CONTENT INDEX

GRI Standard	GRI Disclosure	Session / Explanation
GRI 102: General Disclosures 2016		
Organisational profile		
102-1	Name of the organisation	OIO Holdings Limited
102-2	Activities, brands, products, and services	Annual Report 2021 – Operation and Financial Review, P.6-8 Sustainability Report 2021– About OIO Holdings Limited, P.5
102-3	Location of headquarters	Annual Report 2021 – Corporate Information, P.2 Sustainability Report 2021 – About This Report, P.6-7
102-4	Location of operations	Sustainability Report 2021 – About This Report, P.6-7
102-5	Ownership and legal form	Annual Report 2021 – Notes to the Financial Statements, P.86-87
102-6	Markets served	Annual Report 2021 – Operation and Financial Review, P.6-8
102-7	Scale of the organisation	Sustainability Report 2021 – Employment Practices, P.17-19
102-8	Information on employees and other workers	Sustainability Report 2021 – Employment Practices, P.17-19 The Scope of data covers the Group’s business segments of management services, blockchain agency and consulting services, and staking services, and M&E engineering services.
102-9	Supply chain	Sustainability Report 2021 – Procurement, P.22-23
102-10	Significant changes to the organisation and its supply chain	The Group expanded its blockchain business segment and staking services by acquiring MS Group in May 2021 and providing staking commission since Oct 2021. Therefore, the reporting scope have slightly amended. Please refer to the section headed “About OIO Holdings Limited”, P.5
102-11	Precautionary principle or approach	The Group has developed internal control mechanism and will regularly conduct risk management exercises to identify potential operational risks and development of new products. In addition, the Group has implemented the

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		Whistle-blowing Policy to maintain a high level of cooperate governance and business conduct. Please refer to the section headed “Whistle-blowing Policy”, P.12-13
102-12	External initiatives	No externally developed economic, environmental and social charters, principles, or other initiatives is subscribed or endorsed during FY2021 but may consider it in the future.
102-13	Membership of associations	The Singapore Contractors Association Ltd
Strategy		
102-14	Statement from senior decision-maker	Sustainability Report 2021 – Board Statement, P.2-3
102-15	Key impacts, risks, and opportunities	Sustainability Report 2021 – Climate Change Mitigation and Adaptation, P.13-14
Ethics and integrity		
102-16	Values, principles, standards, and norms of behavior	Sustainability Report 2021 – Board Statement, P.2-3 Annual Report 2021 – Chairman Statement, P.5
102-17	Mechanisms for advice and concerns about ethics	Sustainability Report 2021 – Whistle-blowing Policy, P.12-13
Governance		
102-18	Governance structure	Annual Report 2021 – Corporate Governance Report, P.12-33 Sustainability Report 2021 – Sustainability Governance, P.8
Stakeholder engagement		
102-40	List of stakeholder groups	Sustainability Report 2021 – Stakeholder Engagement, P.8-9
102-41	Collective bargaining agreements	No collective bargaining agreements are in place during FY2021.
102-42	Identifying and selecting stakeholder	Sustainability Report 2021 – Stakeholder Engagement, P.8-9
102-43	Approach to stakeholder engagement	Sustainability Report 2021 - Stakeholder Engagement, P.8-9
102-44	Key topics and concerns raised	Sustainability Report 2021 – Materiality Assessment, P.10-11
Reporting Practice		
102-45	Entities included in the consolidated financial statements	Annual Report 2021 – Notes to the Financial Statements, P.86-87
102-46	Defining report content and topic Boundaries	Sustainability Report 2021 – About This Report, P.6-7 Sustainability Report 2021 – Materiality Assessment, P.10-11
102-47	List of material topics	Sustainability Report 2021 – Materiality Assessment, P.10-11
102-48	Restatements of	Sustainability Report 2021 – GHG Emissions, P.15

	information	
102-49	Changes in reporting	The Group expanded its blockchain business segment and staking services by acquiring MS Group in May 2021 and providing staking commission since Oct 2021. The topic boundaries are still defined by material issues identified in materiality assessment. Please refer to the section headed “Materiality Assessment”, P. 10-11
102-50	Reporting period	Sustainability Report 2021 – About This Report, P.6-7
102-51	Date of most recent report	The publication date of the Sustainability Report 2021 was 24/5/2022.
102-52	Reporting cycle	Reported on an annual basis.
102-53	Contact point for questions regarding the report	Sustainability Report 2021 – Contact Us, P.7
102-54	Claims of reporting in accordance with the GRI Standards	Sustainability Report 2021 – Reporting Framework, P.6-7
102-55	GRI content index	Sustainability Report 2021 – GRI Content Index, P.24-28
102-56	External assurance	This Report has undergone the internal review process by the Group and was reviewed by the Board. The Group did not seek external assurance for FY2021 but may consider it in the future.
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its Boundary	Sustainability Report 2021 – Materiality Assessment, P.10-11
103-2	The management approach and its components	Sustainability Report 2021 – Sustainability Governance, P.8
103-3	Evaluation of the management approach	Sustainability Report 2021 – Sustainability Governance, P.8
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	Annual Report 2021 – Statements of Financial Position, P.45
201-2	Financial implications and other risks and opportunities due to climate change	Sustainability Report 2021 – Climate Change Mitigation and Adaptation, P.13-14
GRI 204: Procurement Practices 2016		
204-1	Proportion of spending on local suppliers	Sustainability Report 2021 – Procurement, P.22-23
GRI 205: Anti-corruption 2016		
205-2	Communication and training about anti-corruption	Sustainability Report 2021 – Anti-corruption, P.12

	policies and procedures	
205-3	Confirmed incidents of corruption and actions taken	Sustainability Report 2021 – Anti-corruption, P.12
GRI 302: Energy 2016		
302-1	Energy consumption within the organisation	Sustainability Report 2021 – Energy Consumption, P.15-16
302-3	Energy Intensity	Sustainability Report 2021 – Energy Consumption, P.15-16
302-4	Reduction of energy consumption	Sustainability Report 2021 – Energy Consumption, P.15-16
302-5	Reductions in energy requirements of products and services	Sustainability Report 2021 – Energy Consumption, P.15-16
GRI 303: Water and Effluents 2018		
303-1	Interactions with water as a shared resource	Sustainability Report 2021 – Water Management, P.16-17
303-2	Management of water discharge-related impacts	Sustainability Report 2021 – Water Management, P.16-17
303-3	Water withdrawal	Sustainability Report 2021 – Water Management, P.16-17
303-4	Water discharge	Sustainability Report 2021 – Water Management, P.16-17
303-5	Water consumption	Sustainability Report 2021 – Water Management, P.16-17
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) GHG emissions	Sustainability Report 2021 – GHG Emissions, P. 15
305-2	Energy indirect (Scope 2) GHG emissions	Sustainability Report 2021 – GHG Emissions, P. 15
305-4	GHG emissions intensity	Sustainability Report 2021– GHG Emissions, P. 15
305-5	Reduction of GHG emissions	Sustainability Report 2021– GHG Emissions, P.15
GRI 401: Employment 2016		
401-1	New employee hires and employee turnover	Sustainability Report 2021– Employment Practices, P.17-19
401-2	Benefits provided to full-time employees that are not provided to temporary or	Sustainability Report 2021– Employment Practices, P.17-19

	part-time employees	
GRI 403: Occupational Health and Safety 2018		
403-1	Occupational health and safety management system	Sustainability Report 2021 – Occupational Health and Safety Management System, P.19-20
403-2	Hazard identification, risk assessment, and incident investigation	Sustainability Report 2021 – Hazard Identification, Risk Assessment and Incident Investigation, P.20 Sustainability Report 2021 – Whistle-blowing Policy, P.12-13
403-3	Occupational health services	Sustainability Report 2021 – Provision of Occupational Health Services, P.21
403-4	Worker participation, consultation and communication on occupational health and safety	Sustainability Report 2021 – Occupational Health and Safety Management System, P.20
403-5	Worker training on occupational health and safety	Sustainability Report 2021 – Safety Training, P.21
403-6	Promotion of worker health	Sustainability Report 2021 – Recruitment and Remuneration , P.19
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Not applicable, as the Group is not involved with occupational health and safety impacts as a result of its business relationships with other entities.
403-9	Work-related injuries	Sustainability Report 2021 – Occupational Health and Safety, P.19-20
GRI 416: Customer Health and Safety 2016		
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Sustainability Report 2021 – Customer Health and Safety, P.21
GRI 418: Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Sustainability Report 2021 – Customer Privacy, P.22