

A scenic photograph of a marina at sunset. The sky is filled with vibrant orange, pink, and purple clouds, reflecting on the calm water. Several sailboats are docked in the marina, and palm trees are visible in the background. A large, semi-transparent circular graphic with a stylized 'G' and 'S' is overlaid on the image.

# CREATING WORLD - CLASS SPACES

**GSH CORPORATION LIMITED**

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# 1. HIGHLIGHTS

## 1.1 CORPORATE PROFILE

GSH Corporation Limited ('GSH' or the 'Company'), together with its subsidiaries (the 'Group'), is a growing property developer in Southeast Asia, with four properties under development in Kuala Lumpur and Kota Kinabalu, Malaysia. It also owns and operates the Sutera Harbour Resort in Kota Kinabalu, comprising two five-star hotels, a 104-berth marina and a 27-hole championship golf course, and the Sutera@Mantanani Resort, an idyllic, 30-room resort on the Mantanani Islands in Sabah.

GSH is listed on the Main Board of the Singapore Exchange.

## 1.2 SCOPE OF SUSTAINABILITY REPORT

The scope of the report covers information on material sustainability aspects of GSH, covering the Hospitality and Property segment, from 1 January 2019 to 31 December 2019 unless otherwise specified. This should sufficiently address stakeholders' concerns in relation to sustainability issues arising from the major business operations of the Group.

This report is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core Option as it provides a set of an extensive framework that is widely accepted as a global standard for sustainability reporting. It also considers the Sustainability Reporting Guide in Practice Note 7.6 of

the Singapore Exchange Securities Trading Limited (SGX-ST) Listing Manual. In preparing our report, we applied the GRI's principles for defining report content and report quality by considering the Group's activities, impacts and substantive expectations and interests of its stakeholders.

The data and information provided within the report have not been verified by an independent third party. We have relied on internal data monitoring and verification to ensure accuracy.

## 1.3 RESTATEMENTS

Besides operating two five-star hotels, we also operate a convention centre, marina and golf course. As such, we have adopted a new organization-specific metric (denominator) to compute environmental impact intensity, from 'Guest Nights' to 'Square Feet', to better reflect the diversity in our operations and improve the comparability to similar integrated resort facilities. As such, we have restated environmental impact intensity data for previous years based on the new organization-specific metric (denominator) in the current report.

## 1.4 SUSTAINABILITY CONTACT

We welcome your views and feedback on our sustainability practices and reporting at [sr@gshcorporation.com](mailto:sr@gshcorporation.com).







Sam Goi Seng Hui  
Executive Chairman

Gilbert Ee Guan Hui  
Chief Executive Officer

### 1.5 MESSAGE TO STAKEHOLDERS

On behalf of the Board of Directors of GSH Corporation Limited, we are pleased to present the Sustainability Report for the financial year ended 31 December 2019 (FY2019).

GSH is committed to creating world-class spaces for living, business and leisure. We bring this commitment to life by embedding responsible business practices in all aspects of the way we work. We believe that doing the right thing in the right way instills pride among our people, and builds trust with our guests and local communities.

#### FY2019 Progress

In the FY2019 sustainability report, we continue to report on the Group's sustainability efforts and progress on Responsible Business, Environmental Sustainability, Empowering Lives, and Green Building. The sustainability report highlights our business principles and approach, and how we operate in an economically, environmentally and socially responsible way, by adopting environmental-friendly practices and creating a positive impact within communities that we operate in. GSH continues to stay true to "Exploring, Discovering Value" by being responsible, mindful and ethical, while focusing on delivering results thereby positioning the Company for profitable and sustainable growth.

In addition, we also report on the progress of our "Sustaining Kota Kinabalu's Marine Heritage" Project with the Borneo Marine Research Institute (BMRI) and Universiti Malaysia Sabah (UMS). In FY2019, we conducted various beach clean-ups, shoreline and plankton biodiversity studies, and reef surveys, increasing public awareness of the importance of preserving and conserving the coastal and marine ecosystems for future generations.

#### Dark Skies Over 2020

However, as we put pen to paper to write this message, the skies have turned ominously dark, with the long shadows of the COVID-19 pandemic. Its massive disruptions and negative impacts are still spreading across the world.

We have therefore taken all necessary measures to ensure the safety and well-being of our personnel and to mitigate the economic fallout of this existential health treat, travel curbs, quarantines, lockdowns and compulsory business shutdowns. This includes the implementation of business continuity plans, enhancement of online activities and austerity measures.

In demonstrating our solidarity to join the authorities' efforts to control the pace of the spread of COVID-19, we vigilantly complied with the government's measures and temporarily closed our hotels and integrated resort operations at Sutera Harbour, and stopped on-site construction works at Eaton Residences and Coral Bay. As far as practicable, our employees from Singapore and Malaysia have also started to work from home. Hopefully, this will help to bring this pandemic to an earlier end. Though the skies are still overcast with the COVID-19 situation, we look forward to fairer weather, hopefully by the second half of 2020.

Lastly, we wish to confirm that the Board has considered sustainability issues as part of its strategic formulation. The Board has determined the material environmental, social and governance (ESG) factors and overseen the management in monitoring these material ESG factors.

On behalf of the Board of Directors

## 2. OUR APPROACH TO SUSTAINABILITY

### 2.1 SUSTAINABILITY ORGANISATIONAL STRUCTURE

Sustainability is a vital part of our corporate strategy for achieving long-term growth. The values we create for our people, the environment and society at large very much influence our financial performance. In order to better accommodate our sustainability goals and values, we have developed a sustainability organisational structure to move things forward.

#### BOARD OF DIRECTORS AND MANAGEMENT

The Board of Directors establishes the sustainability while the Management sees through the implementation of the framework.

#### KEY MANAGEMENT PERSONNEL

Key management personnel in our subsidiaries are charged with organising and coordinating the Corporate Social Responsibility (CSR) work of all departments within the subsidiaries.

#### EMPLOYEES

Relevant head of various departments are responsible for the implementation of CSR works.

### 2.2 SUSTAINABILITY STRATEGY

At the Group, our sustainability strategy aims to create integrated values. Not only do we create economic value by maximising profits and shareholder value, but we also take on a broader responsibility as a global corporate citizen to create societal values. We commit to deliver value to all our stakeholders.

As we look back on our progress over the last year, our efforts to deliver value to all our stakeholders can be summarised as follows:



The sustainable strategy is underpinned by our Sustainable Procurement Practices, and Employee Code of Conduct, which establishes a clear tone at the top with regards to employees' business and ethical conduct.

Our sustainability strategy is guided by a variety of external sources, including the GRI Standards and Sustainability Reporting Guide set out in Practice Note 7.6 of the SGX-ST Listing Manual.

The rest of this report covers our progress and performance against each of these areas, and the impact we have on the economy, environment and society as a result.

### 2.3 CONSULTING OUR STAKEHOLDERS

We listen to our stakeholders and engage with them on an ongoing and ad hoc basis.

An overview of our approach and rationale is set out below (with stakeholders listed in alphabetical order), together with the feedback we have received.

Stakeholders	How we listen	Why we do it	What you've told us
<b>Builders and Suppliers</b>	<ul style="list-style-type: none"> <li>Daily project meetings and updates</li> <li>Informal meet-ups</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring that construction activities are carried out in line with the best practices</li> <li>Ensuring integrity in all purchasing decisions</li> <li>Ensuring green procurement whenever possible</li> <li>Adhering to agreement terms</li> </ul>	<ul style="list-style-type: none"> <li>Fair vendor selection process</li> <li>Ethical conduct</li> <li>Timely payment</li> </ul>
<b>Community</b>	<ul style="list-style-type: none"> <li>Informal meet-ups with members from the community</li> <li>Invitation to special events held by the resort</li> </ul>	<ul style="list-style-type: none"> <li>Foster relationship with community through investments in training and development of local employees</li> </ul>	<ul style="list-style-type: none"> <li>Fulfil needs of local community (access roads, schools, hospitals, facilities, etc.)</li> <li>Sustainability matters</li> <li>Environmentally friendly activities</li> </ul>
<b>Customers and Hotel Guests</b>	<ul style="list-style-type: none"> <li>Guest satisfaction survey forms</li> <li>Email enquiries</li> </ul>	<ul style="list-style-type: none"> <li>Safeguard investment value of customer</li> <li>Ensure service standard of resort staff</li> <li>Maintain star-rating for resort</li> </ul>	<ul style="list-style-type: none"> <li>Desire for premium real estates with good location and reasonable launch price</li> <li>Improve service standards</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>Employee's handbook</li> <li>Periodic staff meetings</li> <li>Staff trainings</li> <li>Email feedbacks from employees</li> </ul>	<ul style="list-style-type: none"> <li>Ensure workplace health and safety to enable employees to work comfortably and safely</li> <li>Employment benefits should address basic needs and help to manage stress and improve health</li> <li>Training and career development should be in place to improve effectiveness and productivity</li> </ul>	<ul style="list-style-type: none"> <li>Manage occupational health and safety</li> <li>Maintain work life balance</li> <li>Provide training and education</li> </ul>
<b>Government and Regulators</b>	<ul style="list-style-type: none"> <li>Letters from and meetings with government and regulators</li> </ul>	<ul style="list-style-type: none"> <li>Keep up with the latest rules and regulations</li> <li>Engagement with regulators</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with relevant rules and regulations</li> </ul>
<b>Investors</b>	<ul style="list-style-type: none"> <li>Shareholders' meeting</li> <li>GSH website</li> <li>Regular updates and communication</li> </ul>	<ul style="list-style-type: none"> <li>Committed to delivering economic value to our capital providers through a strong financial performance and our methods of engagement with them</li> </ul>	<ul style="list-style-type: none"> <li>Long-term profitability</li> <li>Company's performance against targets</li> <li>Compliance with all relevant requirements</li> <li>Ensure business continuity</li> </ul>





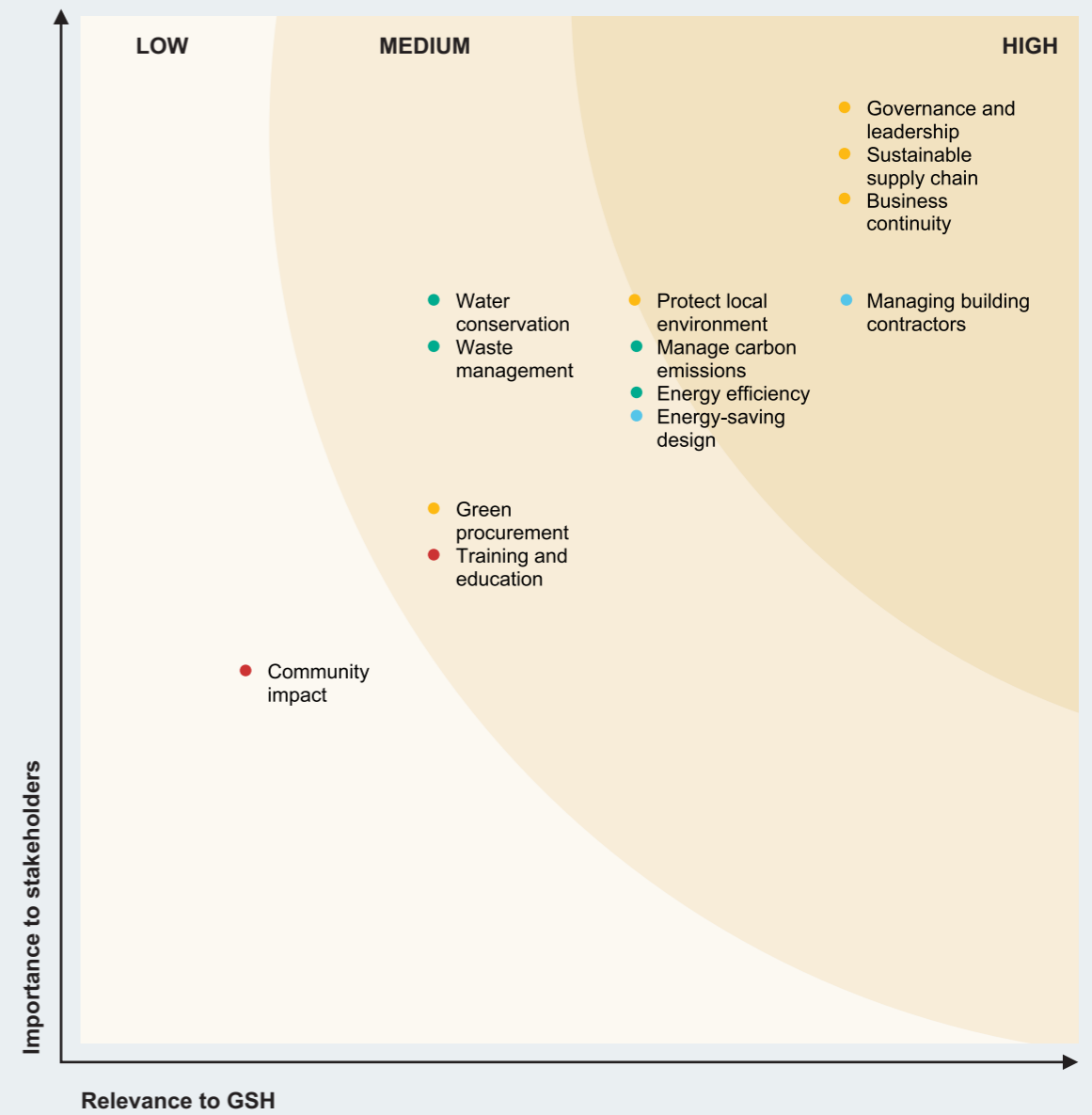
### 2.4 Sustainability materiality

Based on the stakeholder engagement, we developed our sustainability materiality matrix containing material aspects which are aligned with our principal business and operational risks, and formed our sustainability strategy which has shaped our approach to sustainability reporting, as illustrated in the diagram below.

We have also developed metrics to help us measure our progress, as indicated in our sustainability

scorecard in **Appendix B**. We will review and adjust the matrix each year as the external and business context changes.

The aspect boundaries 'within' the organisation are limited to our Hospitality and Property segment, whereas the aspect boundaries 'outside' the organisation include builders and suppliers, community, customers and hotel guests, employees, government and regulators, and investors.





### 3. OUR PERFORMANCE

#### 3.1 HOW WE MEASURE OUR PERFORMANCE

Our sustainability strategy is embedded into the appropriate parts of our business, with dedicated teams for each focus area, and coordination by our relevant departmental managers. Progress will be tracked in two key ways: measuring performance against metrics, and evaluating how well the programmes have advanced through a series of 'commitments'.

##### Metrics and targets

We have established key performance indicators for each of the four focus areas outlined in our sustainability strategy. Periodically, we plan to introduce new metrics and update targets to ensure alignment with our strategy.

##### Commitments

To ensure we have a robust sustainability programme in place, we have included the key commitments for each area of our sustainability strategy. The progress we have made against each key commitment is indicated using the symbols shown in the table below.

We track and review our sustainability programme with the Board of Directors at least once a year.

##### Symbols used to indicate progress against commitments

Symbol	Meaning
	New Commitment this year
	Not Started
	In progress
	Complete
	Ongoing commitment: no end date

#### 3.2 RESPONSIBLE BUSINESS

##### Overview

Our culture of responsible business extends to everyone we engage with – guests, colleagues, partners and local communities. This can only be delivered through our people and the programmes and policies we have put in place.

##### Governance and leadership

The process to uphold this culture of responsible business involves the following:

- Strong governance and leadership, which promotes responsible business attitudes and behaviours throughout GSH;
- Ensuring our employees understand key legal and reputational issues;
- Ensuring the safety and security of employees, guests and other visitors to our hotels and properties;
- Operating effective risk management and internal controls;
- Engaging in responsible procurement; and
- Protecting the local environment.

We have comprehensive Group-wide policies and approaches to address key issues and risks. For example, our Employee Code of Conduct includes bribery. We regularly review our policies to ensure we comply with best practice.

We take the safety of guests, colleagues and visitors to our hotels and resort very seriously. We manage safety and security through a centralised management system that includes safety standards, risk guidance, training and toolkits.

We are committed to operating with integrity and to complying with all relevant laws. GSH has a zero-tolerance approach to bribery and corruption and this position is clearly set out in our Employee Code of Conduct.

In addition, data privacy and the way we handle the personal data of guests, colleagues and others' data is extremely important to us. See our Privacy Statement at [www.gshcorporation.com/privacy\\_statement.html](http://www.gshcorporation.com/privacy_statement.html).

As part of our strategy, GSH has committed to full regulatory compliance.

In FY2019, the Group was not in violation of any of the relevant laws and regulations in our countries of operation that have a significant impact on the Group.

##### Sustainable supply chain

Effective management of environmental, social and economic performance throughout our supply chains can help us conserve resources, optimise processes, increase productivity and promote positive corporate values. We are dedicated to the consistent implementation of our procurement policies and procedures across our entire operation.

Our suppliers must abide by the general Terms and Conditions of our Purchase Orders. It is for us to develop strong relationships with our suppliers to ensure the proper alignment of our policies that will help us maintain a high level of quality and integrity in the procurement of goods and services for the Group.

We also seek to create long-term economic benefits for our communities through the development of local suppliers, supporting a reliable local supply network to drive economic growth.

As part of our strategy, GSH has committed to purchasing at least S\$50 million of our goods and services from local suppliers. In FY2019, total procurement spending on local suppliers amounted to S\$97 million.

##### Green procurement

The Group also strives to balance quality, price and environmental impact when procuring materials. We have developed a Sustainable Products List to encourage the use of locally sourced and environmentally responsible materials. The Policy articulates the importance of buying responsibly sourced paper, avoiding non environmentally-friendly packaging materials whenever possible, and recycling metals and plastics.

As part of our strategy, GSH has committed to using environmentally-friendly cleansing products to perform at least 65% of our tasks by FY2025. In FY2019, we used environmentally-friendly cleansing products to perform 63% of our tasks at the Sutera Harbour Resort, representing an increase of 5% from the previous year. Total spending on green items in FY2019 amounted to S\$184,000.

##### Protect local environment

Safeguarding the environment is central to the Company's goal of sharing the original beauty of our locations with our guests. We also support specific initiatives to instil environmental awareness among our associates, our guests, and the local communities supporting our resort.







#### Sustaining Kota Kinabalu's Marine Heritage

The reef cover in Malaysia is approximately 3,600km<sup>2</sup> in which 75% of it is located off the coast of Sabah. Kota Kinabalu lies on the fringes of the Coral Triangle, a region that is home to the highest marine biodiversity in the world with 2,500 species of marine fishes, 600 species of hard corals, 34% of the world's coral reefs and 30% of the world's mangrove forests.

Through the Sustaining Kota Kinabalu's Marine Heritage Project, the Sutera Harbour Resort (SHR), Borneo Marine Research Institute (BMRI), Universiti Malaysia Sabah (UMS) are pooling resources to save our coral reefs. The project is aimed at increasing public awareness of the importance of preserving and conserving the coastal and marine ecosystems for future generations. Through this project, we are collecting baseline data on the condition and diversity of coastal ecosystems including shoreline and beaches, plankton and coral reefs in Kota Kinabalu.

#### Coral Reefs

- Participants will collect representative baseline data on the biodiversity and the condition of the coral reefs in Kota Kinabalu waters, while identifying present impacts or stress to the reefs.
- To participate in the reef surveys, all volunteers must have a SCUBA diving qualification and competent diving skills.
- Volunteers and stakeholders will undergo training and briefing prior to data collection in order to be able to identify key species and/or assess coral reef condition.

#### Water

- The water body that connects all ecosystems and the plankton that live in the water column are important features of the sea.
- Water samples will be collected and analysed for plankton diversity and key parameters such as temperature, salinity, dissolved oxygen, etc. Participants will have the opportunity to examine and identify plankton from collected water samples under microscope.

#### Shoreline Ecosystems

- Participants will gather information on the marine flora and fauna of the shoreline/ foreshore ecosystems such as the sandy beaches and rocky shores along the Kota Kinabalu coastline and islands.
- Through the beach combing exercise; trash and marine debris will be collected and sorted into categories, which will highlight the common types of debris that end up in our sea.



In FY2019, we conducted the following activities in line with our planned schedules:

**Beach Clean-up**

Surplus human activities have severely affected the marine life in the oceans by releasing harmful substances such as plastic, industrial and agricultural waste, and chemical particles into the ocean. In a bid to reduce the amount of harmful waste at our beaches, we round up 130 volunteers and conducted a beach clean-up exercise in Pulau Sulug, Vista Beach and Kampung Kibagu.

All volunteers were briefed on safety, method of collection and debris categorization (using Ocean Conservancy Trash Data Form). A total of 20,081 items weighing 971kg were collected and sorted

PULAU SULUNG		VISTA BEACH		KAMPUNG BIAGU	
	BEVERAGE BOTTLES (PLASTIC) 1015		TAKE OUT/ AWAY CONTAINERS (FOAM) 297		BEVERAGE BOTTLES (PLASTIC) 5245
	OTHER PLASTIC/ FOAM/PACKAGING 436		BEVERAGE BOTTLES (PLASTIC) 221		CUPS & PLATES (FOAM) 269
	OTHER PLASTIC, BOTTLES (OILS, BLEACH, ETC) 246		OTHER PLASTIC BAGS 200		BOTTLE CAPS (PLASTIC) 268
	OTHER PLASTIC BAGS 124		CONSTRUCTION MATERIALS 190		OTHER PLASTIC, BOTTLES (OILS, BLEACH, ETC) 223
	BEVERAGE CANS 86		OTHER PLASTIC/ FOAM/PACKAGING 145		SHOES/SLIPPERS 159
	STRAWS/STIRRERS 75		FOOD WRAPPER 122		GROCERY BAGS (PLASTIC) 119
	CUPS & PLATES (FOAM) 58		CIGARETTE BUTTS 58		STRAWS/STIRRERS 93
	BOTTLE CAPS (PLASTIC) 55		OTHER PLASTIC, BOTTLES (OILS, BLEACH, ETC) 46		6-PACK HOLDERS 90
	GROCERY BAGS (PLASTIC) 55		WOOD 43		BEVERAGE CANS 85
	CIGARETTE BUTTS 53		STRAWS/STIRRERS 36		DIAPERS 74





**Shoreline Biodiversity**

A shoreline biodiversity survey was conducted at Tanjung Aru beach by team from Jebsen & Jessen (SEA) Pte Ltd (JJSEA) and other volunteers. A transect of 75 metres was laid from the highest intertidal to the lowest intertidal zone across the sandy beach perpendicular to the vegetation line. Observations of the marine fauna on the beach were divided into upper-, middle- and lower shore.

Due to low abundance and diversity of fauna in the upper and middle zones, most of the sampling effort was focused on the lower shore. Diversity and abundance of invertebrates in the upper zones were less due to the drier sand and longer duration of tidal exposure. A total of seven species of marine invertebrates are collected from the lower shore.



Sand Bubber Crabs

Surf Clam

Hermit Crab

**Plankton Diversity**

Phytoplankton is microscopic organisms that live in the surface waters of the ocean. They carry out photosynthesis and form the base of the marine food chain, playing an important role as “plants” of the sea. Despite their importance, they usually receive very little attention. However, in recent years, increasing occurrences of phytoplankton blooms, or rapid massive population explosion of unicellular algal cells, are causing problems in fisheries, tourism and even human health.

To create awareness on plankton and Harmful Algae Blooms (HAB), a workshop and survey of phytoplankton diversity was carried out at Likas Bay, Kota Kinabalu. The volunteers were introduced to the world of plankton, sampling and analyses methods, and the impact of HABs through interactive lectures and discussion. The volunteers were also exposed to sampling equipment, phytoplankton sample observation, identification and analysis in the laboratory.

The results from the workshop showed a single species dominance of phytoplankton *Protoperdinium*, a brackish-water species, which could indicate less than ideal marine water quality in the bay.

Water impairment often affects biodiversity and eutrophication of the water exerts pressure on phytoplankton populations allowing intensive growth of certain harmful toxin-producing species or nuisance blooms that may affect the ecosystem and public health.

The results may indicate the bay is experiencing excessive nutrient input, possibly derived from coastal anthropogenic activities and agricultural and industrial wastes, and if left unchecked, the water quality would further deteriorate and trigger a massive harmful algal bloom event.

It is important to monitor the changes in environmental parameters and indicator species to

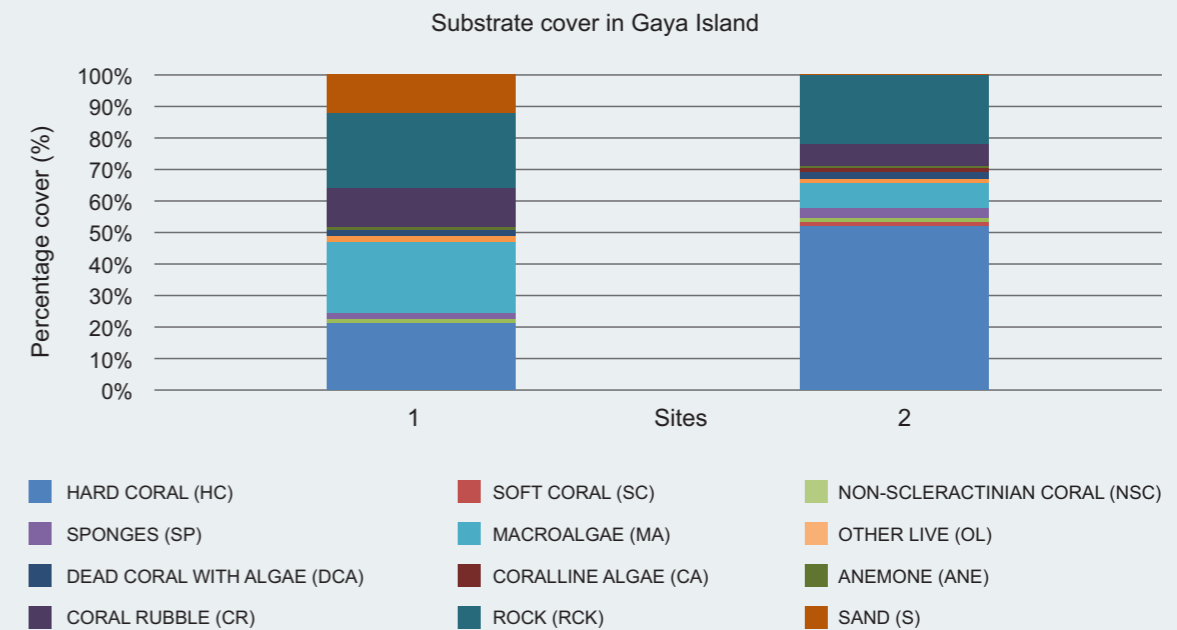
predict potential bloom events that allow the relevant authorities and the public at large to take mitigation measures before the bloom fully develops. Efforts in creating public awareness, such as this workshop, encourage opportunities and incentives for more monitoring programs to be established, as well as forming future preventive measures to alleviate the water of HAB species.



**Reef Survey**

Coral reefs are an important component of the coastal ecosystem in Kota Kinabalu (KK). Reefs can be found fringing along most parts of the islands and coastlines. Approximately 40 sites have been selected for survey representative of the KK reefs with UMS on the north- and SHR on the south of KK city, and the Tunku Abdul Rahman Park (TARP), a marine park within KK district.

Nine volunteers participated in the reef survey at two reef sites at Gaya Island.



A total of 60 reef fish species were captured from the images, with 30 species at Site 1 and 44 species at Site 2. Most of the species are small-sized damsels and wrasses, which are not food-fish. Commercially important food fish include four species of parrotfish, one grouper and one snapper.

Only 13 species of invertebrates were captured from the images, with 9 species at site 1 and 7 species at site 2. The only commercially important groups are 2 species of giant clams. Other invertebrate species are sea cucumber, tube anemone, sea urchin, sea squirt, scallop, nudibranch and feather duster worm.

Please scan the QR code for more information on our Sustaining Kota Kinabalu's Marine Heritage Program.





**Business continuity**

The global outbreak of the coronavirus (**COVID-19**) is likely to have a significant toll on the hospitality and tourism industry worldwide. As a result of the COVID-19 outbreak, the travel restrictions as well as suspension of flights by various countries will impact the hospitality industry in Sabah, including our hotels and resort. Depending on the duration of this epidemic, there will be consequential impact on the short-term performance of our hospitality business.

In demonstrating our solidarity to join the authorities' efforts to control the pace of the spread of COVID-19, we vigilantly complied with the government's measures and temporarily closed our hotels and integrated resort operations at Sutera Harbour

and Sutera at Mantanani, and stopped on-site construction works at Eaton Residences and Coral Bay. As far as practicable, our employees from Singapore and Malaysia have also started to work from home. Hopefully, this will help to bring this pandemic to an earlier end. Though the skies are still overcast with the COVID-19 situation, we look forward to fairer weather, hopefully by the second half of 2020.

**Awards and accolades**

As a testament to our responsible way of doing business and commitment to excellence, we have won a string of awards and accolades as shown in **Appendix A**.

**Commitments: Responsible business**

**Achieve full regulatory compliance**

**Achievements**

- Achieved full regulatory compliance in respect of corporate governance, health and safety, bribery and corruption, and data privacy protection

**FY2019 progress**

- The Group was not in violation of any of the relevant laws and regulations in our countries of operation that have a significant impact on the Group.

**Purchasing at least S\$50 million of our goods and services from local suppliers**

**Purchases from local suppliers (S\$m)**

2019	97
2018	55
2017	57

**FY2019 progress**

- We purchased S\$97 million of our goods and services from local suppliers.
- We seek to create long-term economic benefits for our communities through the development of local suppliers, supporting a reliable local supply network to drive economic growth.

**Using environmentally-friendly cleansing products to perform at least 65% of our tasks by FY2025**

**% Tasks performed using environmentally-friendly cleansing products**

2019	63
2018	58
2017	52

**FY2019 progress**

- 63% of our tasks at SHR were performed using environmentally-friendly cleansing products, representing an increase of 5% from the previous year.
- Total spending on green items in FY2019 amounted to S\$184,000.

**3.3 ENVIRONMENTAL SUSTAINABILITY**

**Overview**

We are committed to constructing and managing world-class sustainable buildings that add tangible value to the communities we served and to operate and maintain those buildings with a strong emphasis on the triple bottom line of economy, environment and society.

Our Environmental Policy provides guidance on undertaking activities in an environmentally responsible manner, with consideration of general environmental management, sustainable use of resources, climate change and the conservation of biodiversity and natural habitats.

**Managing greenhouse gas emissions**

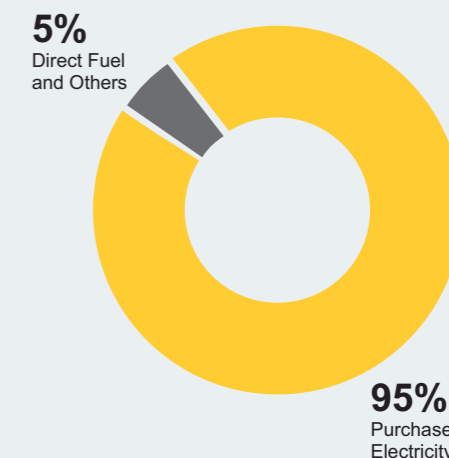
Climate change is a global challenge that affects us all. We support the Paris Agreement as adopted at the 21st Conference of Parties to the United Nations Framework Convention on Climate Change (**COP21**). To help manage our impact on climate change, we monitor and review our carbon footprint on a regular basis.

We are committed to positive action on climate change and dedicated to reducing the risk in the most efficient way for society by reducing GHG emissions in our operations.

To determine the carbon footprint, we collect energy usage data from our Hospitality and Property Segment and then calculate our total annual GHG emissions.

In FY2019, we recorded a carbon footprint intensity of 10.5 tonnes carbon dioxide emission (**tCO<sub>2</sub>e**) per thousand square feet. The emission mainly arises from electricity consumption which accounted for more than 95% of the total carbon emission of GSH. We follow the Greenhouse Gas Protocol established by the World Resources Institute and the World Business Council for Sustainable Development, the standard manual for measuring corporate greenhouse gas emissions.

Using the "control method", we include 100% of the emissions associated with businesses which we directly control. Our carbon footprint includes:



- All fuels used directly by our companies (*Scope 1 emissions*)
- All purchased electricity used in our facilities (*Scope 2 emissions*)
- Impact of business air travel (*Optional Scope 3 emissions*)

Our carbon footprint intensity slightly increased from the previous year as our new island resort, Sutera at Mantanani, commenced operations in FY2019. In addition, we also commenced in-house laundry operations for our own hotels. These new developments contributed to increased electricity usage in the current year.

As such, we have revised our commitment to ensure that our carbon footprint intensity does not exceed 16.0 tCO<sub>2</sub>e/ 1,000 sq ft. We will continue in our efforts to optimise eco-efficiency in our building operations without compromising our level of service to our guests.

**Energy efficiency**

Buildings are energy-intensive structures and electricity often constitutes a significant proportion of operating expenses. By investing in energy efficiency, we not only help protect the environment but can also lower our financial costs.

To enhance our existing assets, we have allocated considerable resources to the refurbishment of the SHR since 2014. We have optimised eco-efficiency in our building operations to cut our energy consumption with the primary goal of reducing our carbon footprint. For example, we replaced our air-cooled chiller plants with more efficient water-cooled systems in FY2019.





**Water conservation**

Water scarcity is a growing concern around the world and a serious global challenge that we must work together to address.

We have adopted a wide range of measures to reduce water consumption at our properties, including installing water-efficient fittings and raising awareness of water scarcity issues among our employees, tenants, customers, hotel guests and communities.

In FY2019, we recorded water consumption intensity of 458 m<sup>3</sup>/ 1,000 sq ft, representing a slight increase from the previous year. The increase is due to the commencement of in-house laundry operations for our own hotels in the current year. We will continue to monitor water usage at our properties and continue to promote awareness on water issues amongst our stakeholders.

**Water recycling**

We have long taken an active role in supporting projects that protect the environment and the eco-system. Various efforts related to these concerns have been put in place and practiced over the years, some of which are either continuously improved or new ones introduced.

Waste water from our hotels and resort, and the Marina & Golf Club are flowed into the sewerage treatment plant for treatment using the Actybio system. The water is then pumped into the 13 ponds in our grounds and used to irrigate the 27-holes golf course.

As part of our strategy, GSH has committed to recycling at least 1,400 m<sup>3</sup> of water per day to irrigate our golf courses on an ongoing basis.

**Waste management**

Disposing of waste is a significant environmental challenge, particularly for resorts located close to environmentally-protected areas. Besides regularly maintaining the cleanliness of our properties, we are also taking steps to manage our waste production and encourage our guests, customers and suppliers to do the same. This includes reducing waste production at source and disposing of waste in a responsible way.

In FY2019, we recorded recycled waste intensity of 149 kg/ 1,000 sq ft. These mainly relates to used oil and scrap metals sold to waste recyclers. We will continue to monitor waste management at our properties and continue to promote awareness on waste management and recycling issues amongst our stakeholders.

**Commitments: Environmental sustainability**

**Ensure carbon footprint intensity does not exceed 16.0 tCO<sub>2</sub>e/ 1,000 sq ft**

**Carbon footprint intensity (tCO<sub>2</sub>e/ 1,000 sq ft)**

2019	10.5
2018 <sup>1</sup>	10.0
2017 <sup>1</sup>	10.5

**FY2019 progress** (N)

- We recorded a carbon footprint intensity of 10.5 tCO<sub>2</sub>e/ 1,000 sq ft. The emission mainly arises from electricity consumption which accounted for more than 95% of the total carbon emission of GSH.
- Our carbon emission intensity slightly increased from the previous year as our new island resort, Sutura at Mantanani, commenced operations in FY2019. In addition, we also commenced in-house laundry operations for our own hotels.
- In light of these new developments, we have revised our commitment to ensure that our carbon footprint intensity does not exceed 16.0 tCO<sub>2</sub>e/ 1,000 sq ft.
- We will continue to optimise the eco-efficiency in our building operations. For example, we replaced our air-cooled chiller plants with more efficient water-cooled systems in FY2019.

**Monitor water consumption intensity**

**Water consumption intensity (m<sup>3</sup>/ 1,000 sq ft)**

2019	458
2018 <sup>1</sup>	439
2017 <sup>1</sup>	424

**FY2019 progress** (C)

- We recorded water consumption intensity of 458 m<sup>3</sup>/ 1,000 sq ft, representing a slight increase from the previous year.
- The increase is due to the commencement of in-house laundry operations for our own hotels in the current year.
- We will continue to monitor water usage at our properties and continue to promote awareness on water issues amongst our stakeholders.

**Recycle at least 1,400 m<sup>3</sup> of water daily to irrigate our golf courses.**

**Achievements**

Recycle at least 1,400 m<sup>3</sup> of water daily to irrigate our golf courses.

**FY2019 progress** (C)

- We have recycled at least 1,400m<sup>3</sup> of water daily, which is pumped into the 13 ponds in our grounds and used to irrigate the 27-hole golf course.

**Monitor recycled waste intensity**

**Recycled waste intensity (kg/ 1,000 sq ft)**

2019	149
2018 <sup>1</sup>	135

**FY2019 progress** (C)

- We recorded recycled waste intensity of 149 kg/ 1,000 sq ft.
- We will continue to monitor recycled waste management at our properties and continue to promote awareness on waste management and recycling issues amongst our stakeholders.

<sup>1</sup> Restated



### 3.4 EMPOWERING LIVES

#### Overview

At our properties, we work to have a positive impact by creating jobs and learning opportunities, and contributing our efforts towards issues facing the community. We are creating more sustainable communities through skills-building opportunities.

#### Training and education

Personal and professional development is an ongoing journey. The Group considers an effective learning and development program is crucial in keeping our employees motivated and building a strong sense of loyalty and pride towards our business.

Through our training and education programme, we are developing people, improving their employability and growing their careers in the hospitality industry. Our hotels and corporate offices partner with local community organisations and education providers, to offer them on the job work experience. We're creating a pool of skilled, motivated and engaged people who are committed to providing a consistently great experience for our guests. We are working to expand the number and range of our internal and external training programs. Our programs fall into one or more of the following broad categories:

- Staff orientation
- Customer service
- Professional development
- Leadership and team building
- Health and safety
- Security

In FY2019, we organised numerous training courses, tutorials and workshops to equip our people with the necessary skills and knowledge to help them excel as employees and individuals. Our operations staff received an average of 59.6 hours of training each in FY2019, compared to 52.0 hours in FY2018.

As part of our strategy, we will continue to focus on training and has committed to achieve a minimum of 40 hours of training per employee per year on an ongoing basis for operations staff.

#### Rural Youth Hospitality Program

In FY2018, we embarked on a Rural Youth Hospitality Program targeting the rural youths. Under this program, the youths will undergo a 6-months skills, knowledge and hospitality culture course. Our external training providers also joint-ventured into this program and provides cost-free training in the various sections of Hotel Skills Training to the youths. The objective was to provide hospitality training and eventually hire these youths as skilled hospitality professionals.

Since 2018, a cumulative total of 72 youths have benefitted from the program. Out of the 51 youths from our FY2019 enrolment, 19 youths successfully graduated and have been employed by SHR. 30 youths are still undergoing training.

Please scan the QR code for more information on our Rural Youth Hospitality Program.



#### Community impact

To enable long term prosperity for the communities in which we operate, we do our part through our business conduct and operations as well as by harnessing our competencies to address issues faced by the community.

Our giving and community engagement is guided by our main areas of focus, which include:

- education and sports;
- healthcare;
- basic infrastructure building and maintenance; and
- indigenous capacity and community building.

In addition, we continue to engage our community through the Sutera Harbour 7k Sunset Charity Run, which has become an iconic annual event in Kota Kinabalu.



#### Sutera Harbour 7K Sunset Charity Run

Sutera Harbour 7K Sunset Charity Run (7K Run) is an annual event held by Sutera Harbour Resort in Kota Kinabalu, Sabah to get people running for fun, health and charity. The 19<sup>th</sup> 7K Run was held on 27 July 2019, attracting more than 7,000 participants.

Proceeds of S\$36,000 received from the run were divided among the following beneficiaries:

- Sabah Thalassemia Society: Provides medical services to patients of Thalassemia, an inherited blood disorder that requires regular blood transfusions and bone marrow transplants as treatments options; and
- Special Olympics Sabah: Provides year-round sports training and athletic competition in variety of Olympic-typed sports for children and adults with mental disabilities.

These funds were collected through various means including registration, vendor's booth rental and cash sponsorships. In addition, the organisers had also distributed 7K Run School Collection Cards to selected schools within Kota Kinabalu. Depending on the amount collected as well as the number of runners, the schools can retain up to 90 percent of the total gross amount collected for school activities and projects.

Please scan the QR code for more information on the 19<sup>th</sup> Sutera Harbour 7K Sunset Charity Run.



#### Commitments: Empowering lives

Achieve minimum of 40 hours of training per employee

Training hours per employee (Hours)

2019	59.6
2018	52.0
2017	42.5

FY2019 progress

- We organised numerous training courses, tutorials and workshops to equip our people with the necessary skills and knowledge to help them excel as employees and individuals.
- Our operations staff received an average of 59.6 hours of training each in FY2019.

Providing career opportunities through our Rural Youth Hospitality Program

No. of rural youths benefited through our Rural Youth Hospitality Program

2019	51
2018	21

FY2019 progress

- Since FY2018, we embarked on a Rural Youth Hospitality Program targeting rural youths to provide hospitality training and eventually hire them as skilled hospitality professionals.
- Out of the 51 youths from our FY2019 enrolment, 19 youths successfully graduated and have been employed by SHR. 30 youths are still undergoing training.

Raising money for our beneficiaries through our annual Sutera Harbour 7K Sunset Charity Run

Proceeds raised (S\$'000)

2019	36
2018	65
2017	35

FY2019 progress

- Proceeds of more than S\$100,000 has been raised from the Sutera Harbour 7K Sunset Charity Run since FY2017, providing much needed funds to our beneficiaries.



### 3.5 GREEN BUILDING

#### Overview

On the property development front, we have adopted energy saving designs in our new builds from the onset and continue to emphasise on construction safety.

#### Energy saving design

Project conceptualisation is carried out in the initial phase for property development. This may be carried out in-house by the Group, or outsourced to professional consultants, such as architects, interior designers, surveyors or engineers (mechanical, electrical, civil and structure). In our recent projects, we have incorporated energy saving designs into our building plans. To improve electricity efficiency, various energy

saving practices have been implemented in the Group's offices, hotels and residential, industrial and commercial properties managed by the Group. For example, all air-conditioning units in Eaton Residences comply to the energy efficiency equivalent to 3 ticks of the BCA Greenmark. Hence, these units consume less energy and are more environmental-friendly.

#### Managing building contractors

Construction site safety is a top priority for the Group. Currently, our major construction projects are located in Malaysia. We have institutionalised our Construction Safety Management with the following objectives and commitments:

#### Objectives of Construction Safety Management

- Minimise site injuries and to achieve zero fatalities
- Ensure contractor compliance with the relevant safety regulations
- Enhance the overall awareness of our staff and contractors of how to deal with safety concerns
- Build up the knowledge and capacity of site workers on how to carry out their work safely

#### Commitments

- Achieve zero site injuries and zero fatalities
- Ensure appointed main contractors to be ISO9001:2015, ISO14001 or OHSAS18001 certified

The Group has also developed a comprehensive set of guidelines and operating procedures to enhance overall safety performance at our project sites.

While the Real Estate Division acts as a coordinator for all matters related to construction safety, the Group has delegated specific responsibilities to different parties, to facilitate the incorporation of safety considerations and manage the potential safety hazards from multiple perspectives at different stages of a construction project.

#### Commitments: Green building

**Achieve zero site injuries and zero fatalities**

#### Achievements

- Achieve zero site injuries and zero fatalities.

#### FY2019 progress



- We commit to ensure the safety of our employees, those who work with us and anyone affected by our works as our number one priority.

**Ensure appointed main contractors to be ISO14001 and OHSAS18001 certified**

#### Achievements

- All appointed main contractors are ISO14001 and OHSAS18001 certified.

#### FY2019 progress



- All our appointed main contractors are ISO14001 and OHSAS18001 certified.





## APPENDIX A: Awards and accolades

Date	Description of award	Recipient(s)
September 2019	• Outstanding Contributor in Sabah for Sabah Best Residential Property 2019: Coral Bay	• GSH Corporation Limited
April 2019	• Malaysia Best Employer Brand Award 2018	• Sutera Harbour Resort
March 2019	• Industry Excellence in Hospitality (Sabah Top Achievers Award 2019)	• Sutera Harbour Resort
June 2018	• Malaysia Best Employer Brand Award 2018	• Sutera Harbour Resort
March 2018	• 2018 Global Marina Accreditation by Marina Industries Association, Australia	• Sutera Harbour Marina & Country Club
March 2018	• 2017 Golf Circle Award Winner	• The Magellan Sutera Resort
February 2018	• CTRIP Travelers' Top Spots 2017 Best Food & Beverage Hotel	• The Magellan Sutera Resort
November 2017	• CTRIP Best Supporting Hotel Award 2017	• The Pacific Sutera Hotel • The Magellan Sutera Resort
October 2017	• 7 <sup>th</sup> Asian Lifestyle Tourism Awards 2017 Beach Resorts	• The Magellan Sutera Resort • Sutera Harbour Marina & Country Club
July 2017	• Sabah Emergency Response Team Competition 2017 by Fire & Rescue Department of Malaysia-Sabah/Bomba Sabah 2017	• The Pacific Sutera Hotel • The Magellan Sutera Resort
April 2017	• Malaysia Best Employer Brand Awards 2017	• Sutera Harbour Resort

## APPENDIX B: Sustainability scorecard

### Financial results (Group)

Performance indicators	Units	FY2017	FY2018	FY2019
Revenue	S\$m	110	100	154

### Responsible business

Performance indicators	Units	FY2017	FY2018	FY2019
Regulatory and compliance incidents	Number	0	0	0
Purchases from local suppliers	S\$'000	57,059	54,804	97,073
Purchases from green suppliers	S\$'000	156	142	184

### Environmental sustainability

Performance indicators	Units	FY2017 <sup>1</sup>	FY2018 <sup>1</sup>	FY2019
Carbon emission intensity	tCO <sub>2</sub> e/ 1,000 sq ft	10.5	10.0	10.5
Water consumption intensity	m <sup>3</sup> / 1,000 sq ft	424	439	458
Recycled waste intensity	kg/ 1,000 sq ft	n.a.	135	149

### Empowering lives

Performance indicators	Units	FY2017	FY2018	FY2019
Training hours per employee	Hours	42.5	52.0	59.6
Rural youths benefited through the Rural Youth Hospitality Program	Number	n.a.	21	51
Amount raised for charities	\$'000	35	65	36

### Green building

Performance indicators	Units	FY2017	FY2018	FY2019
Number of accidents per 100,000 man-hours	Number	0.0	0.2	0.0
% of appointed main contractors who are ISO14001 and OHSAS18001 certified	%	100	100	100

<sup>1</sup> Restated.



## Appendix C: GRI content index

The GRI Content Index references the GSH Corporation Limited Sustainability Report 2019 (SR), the Annual Report 2019 (AR) and the GSH Corporate Website (Web).

Disclosure number	Disclosure title	Page reference and remarks
<b>GRI 102: General disclosures</b>		
<b>Organisational profile</b>		
102-1	Name of organisation	• AR: Corporate Profile (Page 1)
102-2	Activities, brands, products, and services	• AR: Corporate Profile (Page 1)
102-3	Location of headquarters	• AR: Domicile and Activities – Note 1 to the Financial Statements (Page 76)
102-4	Location of operations	• AR: Our Footprint (Page 25) • AR: Our Property Portfolio (Pages 6-15) • AR: Subsidiaries – Note 6 to the Financial Statements (Pages 115-117) • Web: Our Business – Property Development • Web: Our Business – Hospitality
102-5	Ownership and legal form	• AR: Domicile and Activities – Note 1 to the Financial Statements (Page 76)
102-6	Markets served	• AR: Operating Segments – Note 29 to the Financial Statements (Pages 142-144)
102-7	Scale of organisation	• AR: Corporate Profile (Page 1) • AR: Operating Segments – Note 29 to the Financial Statements (Pages 142-144)
102-8	Information on employees and other workers	• SR: Empowering Lives (Page 21-22)
102-9	Supply chain	• SR: Responsible Business (Pages 9-17)
102-10	Significant changes to the organisation and its supply chain	• Web: Our Company
102-11	Precautionary Principle or approach	• AR: Corporate Governance Report (Pages 26-58)
102-12	External initiatives	• Not applicable
102-13	Membership of associations	• Not applicable
<b>Strategy</b>		
102-14	Statement from senior decision-maker	• AR: Message to Shareholders (Pages 4-5) • SR: Message to Stakeholders (Page 4) • Web: Message to Shareholders
102-15	Key impacts, risks, and opportunities	• AR: At A Glance (Pages 2-3) • AR: Independent Auditors Report (Pages 63-67)

Disclosure number	Disclosure title	Page reference and remarks
<b>GRI 102: General disclosures</b>		
<b>Ethics and integrity</b>		
102-16	Values, principles, standards, and norms of behavior	• SR: Sustainability Strategy (Page 5) • Web: Our Company Mission & Vision
102-17	Mechanisms for advice and concerns about ethics	• AR: Corporate Governance Report (Pages 26-58)
<b>Governance</b>		
102-18	Governance structure	• AR: Corporate Governance Report (Pages 26-58)
102-19	Delegating authority	• AR: Corporate Governance Report (Pages 26-58)
102-20	Executive-level responsibility for economic, environmental, and social topics	• SR: Sustainability Organisational Structure (Page 5)
102-21	Consulting stakeholders on economic, environmental, and social topics	• SR: Consulting Our Stakeholders (Page 5)
102-22	Composition of the highest governance body and its committees	• AR: Corporate Governance Report (Pages 26-58)
102-23	Chair of the highest governance body	• AR: Corporate Governance Report (Pages 26-58)
102-24	Nominating and selecting the highest governance body	• AR: Corporate Governance Report (Pages 26-58)
102-25	Conflicts of interest	• AR: Corporate Governance Report (Pages 26-58) • AR: Statistics of Shareholdings (Pages 170-171) • AR: Directors' Statement (Pages 59-62) • SR: Sustainability Strategy (Page 5)
102-26	Role of highest governance body in setting purpose, values, and strategy	• AR: Corporate Governance Report (Pages 26-58)
102-27	Collective knowledge of highest governance body	• AR: Corporate Governance Report (Pages 26-58)
102-28	Evaluating the highest governance body's performance	• AR: Corporate Governance Report (Pages 26-58)
102-29	Identifying and managing economic, environmental, and social impacts	• SR: Sustainability Materiality (Page 8)
102-30	Effectiveness of risk management processes	• AR: Corporate Governance Report (Pages 26-58)
102-31	Review of economic, environmental, and social topics	• SR: Sustainability Report (Pages 1-31)



Disclosure number	Disclosure title	Page reference and remarks
<b>GRI 102: General disclosures</b>		
102-32	Highest governance body's role in sustainability reporting	• SR: Sustainability Organisational Structure (Page 5)
102-33	Communicating critical concerns	• SR: Sustainability Materiality (Page 8)
102-34	Nature and total number of critical concerns	• SR: Sustainability Materiality (Page 8)
102-35	Remuneration policies	• AR: Corporate Governance Report (Pages 26-58)
102-36	Process for determining remuneration	• AR: Corporate Governance Report (Pages 26-58)
102-37	Stakeholders' involvement in remuneration	• AR: Corporate Governance Report (Pages 26-58)
102-38	Annual total compensation ratio	• AR: Corporate Governance Report (Pages 26-58)
102-39	Percentage increase in annual total compensation ratio	• AR: Corporate Governance Report (Pages 26-58)
<b>Stakeholder engagement</b>		
102-40	List of stakeholder groups	• SR: Consulting Our Stakeholders (Page 5)
102-41	Collective bargaining agreements	• Not applicable
102-42	Identifying and selecting stakeholders	• SR: Consulting Our Stakeholders (Page 5)
102-43	Approach to stakeholder engagement	• SR: Sustainability Strategy (Page 5)
102-44	Key topics and concerns raised	• SR: Consulting Our Stakeholders (Page 5)
<b>Reporting practice</b>		
102-45	Entities included in the consolidated financial statements	• AR: Subsidiaries – Note 6 to the Financial Statements (Pages 115-117) • AR: Associate – Note 7 to the Financial Statements (Pages 118-119)
102-46	Defining report content and topic Boundaries	• SR: Sustainability Materiality (Page 8)
102-47	List of material topics	• SR: Sustainability Materiality (Page 8)
102-48	Restatements of information	• SR: Restatements (Page 1)
102-49	Changes in reporting	• Not applicable
102-50	Reporting period	• SR: Scope of Sustainability Report (Page 1)
102-51	Date of most recent report	• 31 December 2018
102-52	Reporting cycle	• Annual

Disclosure number	Disclosure title	Page reference and remarks
<b>GRI 102: General disclosures</b>		
102-53	Contact point for questions regarding the report	• SR: Sustainability Contact (Page 1)
102-54	Claims of reporting in accordance with the GRI Standards	• SR: Scope of Sustainability Report (Page 1)
102-55	GRI content index	• SR: GRI Content Index (Page 27-31)
102-56	External assurance	• No external assurance
<b>GRI 200: Economic disclosures (applicable sections only)</b>		
<b>Economic performance</b>	201-1	Direct economic value generated and distributed • SR: Sustainability Scorecard (Page 26)
<b>Procurement practices</b>	204-1	Proportion of spending on local suppliers • SR: Responsible Business (Pages 9-17)
<b>Anti-corruption</b>	205-3	Confirmed incidents of corruption and actions taken • There is no incidences of corruption.
<b>Anti-competitive behavior</b>	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices • There is no legal actions for anti-competition.
<b>GRI 300: Environment disclosures (applicable sections only)</b>		
<b>Energy</b>		
	302-1	Energy consumption within the organisation • SR: Environmental Sustainability (Pages 18-20)
	302-4	Reduction of energy consumption • SR: Environmental Sustainability (Pages 18-20)
<b>Water</b>		
	303-3	Water recycled and reused • SR: Environmental Sustainability (Pages 18-20)
<b>Emissions</b>		
	305-1	Direct (Scope 1) GHG emissions • SR: Environmental Sustainability (Pages 18-20)
	305-2	Energy indirect (Scope 2) GHG emissions • SR: Environmental Sustainability (Pages 18-20)
	305-3	Other indirect (Scope 3) GHG emissions • SR: Environmental Sustainability (Pages 18-20)
	305-4	GHG emissions intensity • SR: Environmental Sustainability (Pages 18-20)
	305-5	Reduction of GHG emissions • SR: Sustainability Scorecard (Page 26) • SR: Environmental Sustainability (Pages 18-20)
<b>Effluents and waste</b>		
	306-1	Water discharge by quality and destination • SR: Environmental Sustainability (Pages 18-20)
	306-2	Waste by type and disposal method • SR: Environmental Sustainability (Pages 18-20) • SR: Sustainability Scorecard (Page 26)
<b>Laws and regulations</b>		
	307-1	Non-compliance with environmental laws and regulations • There is no non-compliance with environmental laws and regulations.



Disclosure number	Disclosure title	Page reference and remarks
<b>GRI 400: Social disclosures</b> (applicable sections only)		
<b>Occupational health and safety</b>	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	<ul style="list-style-type: none"> <li>SR: Green Building (Pages 23 - 24)</li> </ul>
<b>Training and education</b>	404-1 Average hours of training per year per employee	<ul style="list-style-type: none"> <li>SR: Empowering Lives (Pages 21-22)</li> <li>SR: Sustainability Scorecard (Page 26)</li> </ul>
	404-2 Programs for upgrading employee skills and transition assistance programs	<ul style="list-style-type: none"> <li>SR: Empowering Lives (Pages 21-22)</li> </ul>
<b>Child labor</b>	408-1 Operations and suppliers at significant risk for incidents of child labor	<ul style="list-style-type: none"> <li>Child labour is strictly prohibited.</li> </ul>
<b>Forced or compulsory labor</b>	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	<ul style="list-style-type: none"> <li>Forced and compulsory labour is strictly prohibited.</li> </ul>
<b>Local communities</b>	413-1 Operations with local community engagement, impact assessments, and development programs	<ul style="list-style-type: none"> <li>SR: Empowering Lives (Pages 21-22)</li> </ul>
<b>Customer privacy</b>	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<ul style="list-style-type: none"> <li>SR: Responsible Business (Pages 9-17)</li> <li>SR: Sustainability Scorecard (Page 26)</li> </ul>
<b>Socioeconomic compliance</b>	419-1 Non-compliance with laws and regulations in the social and economic area	<ul style="list-style-type: none"> <li>SR: Responsible Business (Pages 9-17)</li> <li>SR: Sustainability Scorecard (Page 26)</li> </ul>

