



CREATING  
WORLD-CLASS  
SPACES

SUSTAINABILITY REPORT  
2017









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# 1. HIGHLIGHTS

## 1.1 SCOPE OF REPORT

The scope of the report covers information on material sustainability aspects of GSH Corporation Limited (GSH or the 'Group'), covering the Hospitality and Property segment, from 1 January 2017 to 31 December 2017 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.

## 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*





## 1.2 MESSAGE TO STAKEHOLDERS

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 instils pride among our people, and builds trust with our guests and local communities.

Since 2013, we have been actively protecting the local environment that we operate in, with special emphasis on the initiation and commission of a study on biodiversity and coral reef condition in Kota Kinabalu waters as part of our marine conservation programmes.

To support this, we have built a responsible business model, emphasising on sustainable supply chain, building robust relationships with local suppliers, and encouraging green procurement in our businesses. We also do our part for environmental sustainability by encouraging our staff and customers to conserve water and electricity, thereby reducing our carbon emissions.

In addition, we continue to engage the communities by creating jobs and learning opportunities, and contributing our efforts towards issues facing the community. For 17 consecutive years, we have organised the Sutera Harbour 7K Sunset Charity Run and channelled the proceeds to local charities and societies to further their causes.

On the property development front, we have adopted energy saving designs in our new builds and continue to emphasise on construction safety, which is evident in our track record of zero incidents.

This Sustainability Report highlights our governance-driven approach towards sustainability to adopt environmental-friendly practices and create a positive impact within communities that we operate in. It also details how we embark on this sustainability journey to ensure the long-term success of GSH and our stakeholders in a fast-changing and uncertain world.



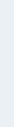


## 2. OUR APPROACH TO SUSTAINABILITY

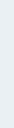
### 2.1 SUSTAINABILITY ORGANISATIONAL STRUCTURE

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 determine our financial performance. We developed a sustainability organisational structure to move things forward:

BOARD OF DIRECTORS



KEY MANAGEMENT  
PERSONNEL



EMPLOYEES



## 2.2 SUSTAINABILITY STRATEGY

At the Group, our sustainability strategy aims to create integrated values. Together with disciplined execution of our strategy and a commitment to doing business responsibly, we commit to deliver value to all our stakeholders through the following:

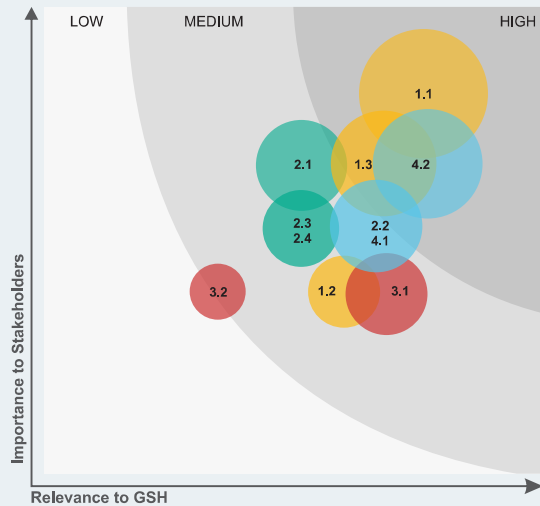


The sustainable strategy is underpinned by our Sustainable Procurement Practices, and Employee Code of Conduct, which establishes a clear tone at the top with regards to employees' business and ethical conduct. The strategy is also guided by external sources, including the Global Reporting Initiative Standards and Sustainability Reporting Guide in Practice Note 7.6 of the Singapore Exchange Listing Rules.

## 2.3 SUSTAINABILITY MATERIALITY MATRIX

We recognize the need to continuously develop our responsible business approach in order to address growing stakeholder expectations around our impact on the economy, environment and society. As such, we periodically consult with our stakeholders to determine the issues that are most relevant to them and GSH. Some of our stakeholder's comments can be found in **Appendix B**

Using a materiality index, we align our responsible business priorities with GSH's principal business and operational risks. We have also developed metrics to help us measure our progress, as indicated in our sustainability scorecard in **Appendix A**. We will review and adjust the matrix each year, as the external and business context changes.



### Responsible Business

- 1.1 Sustainable supply chain
- 1.2 Green procurement
- 1.3 Protect local environment

### Environmental Sustainability

- 2.1 Manage carbon emissions
- 2.2 Energy efficiency
- 2.3 Water conservation
- 2.4 Waste management

### Empowering Lives

- 3.1 Training and education
- 3.2 Community impact

### Green Building

- 4.1 Energy saving design
- 4.2 Managing building contractors



## 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 programs 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. As this is our first year adopting sustainability reporting, we will be establishing targets within the next year to hold ourselves accountable and track how we are doing.

Periodically, we plan to introduce new metrics and update targets to ensure alignment with our strategy.

#### Commitments

To ensure we have a robust sustainability program in place, we will also publish the key initiatives we plan to implement within the next year.

### 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 in place. This involves:

- 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 two hotels very seriously. We manage safety and security through a centralized management system that includes safety standards, risk guidance, training and toolkits for both hotels.

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).

#### Sustainable supply chain

Effective management of environmental, social and economic performance throughout our supply chains can help us conserve resources, optimize 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.

In 2017, the total procurement spending on local suppliers amounted to S\$ 57 million.

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.

Our suppliers must abide by the general Terms and Conditions of our Purchase Orders.





**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.

For instance, we use environmentally friendly cleansing products to perform at least 52% of our tasks at the Sutera Harbour Resort. In 2017, the total spending on green items amount to S\$156,000.

**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 instill environmental awareness among our associates, our guests, and the local communities supporting our resort.

**Sustaining Kota Kinabalu's Marine Natural Heritage**

Sutera Harbour Resort (SHR) has always been a strong supporter of marine conservation. Since 2013, SHR has initiated a study on biodiversity and coral reef condition in Kota Kinabalu waters, assisted by specialists from the University Malaysia Sabah (UMS) Borneo Marine Research Institute, with whom SHR has established a strategic alliance. This project helps to create awareness among our own staff, hotel guests, and Club members, on the importance of conserving the fragile eco-system as many of the coral reef species

in Kota Kinabalu are facing extinction.

In 2017, a Memorandum of Agreement was reached between UMS and SHR on gathering baseline data of the biodiversity and coral reef condition in Kota Kinabalu waters. The Kota Kinabalu coastline stretches from Karambunai in the north to Tanjung Aru and Kepayan in the south, facing the South China Sea. Parts of the coastline are fringed with important marine ecosystems such as mangroves, rocky shores, sandy beaches, seagrass beds and coral reefs. Other parts lie within the nearby Tengku Abdul Rahman Marine Parks.

The overarching goal of this project is to be inclusive, by engaging a pool of volunteers, including UMS, SHR and other stakeholders to participate in the baseline data collection on the marine biodiversity and coastal ecosystems of Kota Kinabalu. This was boosted by the co-sponsorship and participation of Jebsen & Jessen (SEA) Pte Ltd, a leading industrial group, that was first in attaining carbon neutrality in South East Asia.

This project has been, be designated by the parties as an International Year of the Reef 2018 project, under the auspices of the International Coral Reef Initiative (ICRI), to strengthen global awareness of coral reefs and ecosystems; promote partnerships and management strategies for marine conservation; and share best practices for sustainable coral reef management.

A combined estimated budget of RM500,000 has been set aside for the project, which will be equally underwritten by the project partners and co-sponsors.

**Key statistics: Responsible business**

Performance indicators	2017	Units
Spending on local suppliers	57,059	S\$'000
Spending on green items	156	S\$'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 serve 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 carbon 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.

By analysing our carbon footprint, we have found

that most of our GHG emissions are attributable to our energy consumption. We have optimized eco-efficiency in our building operations to cut our energy consumption with the primary goal of reducing our carbon footprint.

For example, we are replacing old, less efficient lighting fixtures and passenger and service lifts with modern, more efficient ones.

In 2017, we recorded a carbon emission intensity of 52.2 kg CO<sub>2</sub>e/ Guest Night.

#### 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. Initiatives over the past years include replacing energy saving bulbs and passenger and service lifts.

In 2017, we recorded electricity consumption intensity of 87.1 kWh/ Guest Night.





In the next two years, we plan to replace our air-cooled chiller plants with more efficient water-cooled systems, which will save at least 20% of our electricity costs.

**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, and communities.

In 2017, we recorded water consumption intensity of 2.1 m<sup>3</sup>/ Guest Night.

**Water conservation at Sutera Harbour Resort**

SHR has long taken an active role in supporting projects that protect the environment and the ecosystem. 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 both hotels 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 ponds at the golf course and used to water the golf course.

**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 2017, we recorded waste consumption intensity of 11.02 kg/ Guest Night.

**Key statistics: Environmental sustainability**

Performance indicators	2017	Units
Carbon emission intensity	52.2	kg CO <sub>2</sub> e/ Guest Night
Electricity consumption intensity	87.1	kWh/ Guest Night
Water consumption intensity	2.1	m <sup>3</sup> / Guest Night
Waste intensity	11.02	kg/ Guest Night



### 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 to be a critical part of keeping our employees motivated and encouraging them to build 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 organizations 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.

Next year, we plan to launch a CSR program to train rural youths to be hospitality professionals.

We are working to expand the number and range of our internal and external training programs. In 2017, we organized 119 training courses, tutorials and workshops to equip our people with the necessary skills and knowledge to help them excel as employees and individuals. The average training hours per staff is about 2.3 hours. 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

#### Community impact

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



#### 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. In 2017, the 7K Run was flagged off at 17:17 hours on 1 July 2017 to mark the 17<sup>th</sup> anniversary of the run.

Proceeds of S\$35,000 received from the run are 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;
- Special Olympics Sabah: Provides year-round sports training and athletic competition in variety of Olympic-typed sports for children and adults with mental disabilities; and
- PEMADAM Bandaraya Kota Kinabalu: Provides anti-drug awareness programmes.

These funds are collected through various means including registration, purchase of 7K Run vouchers, and cash sponsorships. In addition, the organizers have 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.

#### Key statistics: Empowering lives

Performance indicators	2017	Units
Training hours per staff	2.3	Hours
Amount raised for charities	35	S\$'000

### 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 emphasize on construction safety.

#### Energy saving design

Project conceptualization 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. Our major construction projects are located in Singapore and Malaysia. In FY2017, we have a track record of zero incidents. We institutionalized our construction safety management with the following objectives:

- To ensure contractor compliance with the relevant safety regulations;
- To enhance the overall awareness of our staff and contractors of how to deal with safety concerns;
- To build up the knowledge and capacity of site workers on how to carry out their work in a safe fashion; and
- To minimize site injuries and to achieve zero fatalities.

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.

#### Key statistics: Empowering lives

Performance indicators	2017	Units
% of appointed main contractors who are ISO 14001 and OHSAS 18001 certified or externally audited for EHS compliance on site	100	%
Total man-hours	232,140	Hours
Number of serious accidents	0	Number
Number of accidents per 100,000 man-hours	0	Number
Total construction safety training hours for contractors	1,485	Hours
Total construction safety training hours for GSH staff	10	Hours





## APPENDIX A: SUSTAINABILITY SCORECARD

### FINANCIAL RESULTS (GROUP)

Description	Units	2017
Revenue	S\$'000	110,325

### RESPONSIBLE BUSINESS

Spending on local suppliers	S\$'000	57,059
Spending on green items	S\$'000	156

### ENVIRONMENTAL SUSTAINABILITY

Carbon emission intensity	kg CO <sub>2</sub> e / Guest Night	52.2
Electricity consumption intensity	kWh / Guest Night	87.1
Water consumption intensity	m <sup>3</sup> / Guest Night	2.1
Waste intensity	Kg / Guest Night	11.02

### EMPOWERING LIVES

Training hours per staff	Hours	2.3
Amount raised for charities	\$'000	35







## GREEN BUILDING AND CONSTRUCTION

Description	Units	2017
% of appointed main contractors who are ISO 14001 and OHSAS 18001 certified or externally audited for EHS compliance on site	%	100
Total man-hours	Hours	232,140
Number of accidents	Number	0
Number of accidents per 100,000 man-hours	Number	0
Total construction safety training hours for contractors	Hours	1,485
Total construction safety training hours for GSH staff	Hours	10



## APPENDIX B: 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
Builders and Suppliers	<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>• Ensure 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>
Community	<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>
Customers and Hotel Guests	<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>• Improved service standards</li> </ul>
Employees	<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 enables the 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>
Government and Regulators	<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>• Engage with regulators</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with relevant rules and regulations</li> </ul>
Investors	<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> </ul>

## APPENDIX C: GRI CONTENT INDEX

### GRI Standards Content Index

The GRI Content Index references the GSH Corporation Limited Sustainability Report 2017 (SR), the Annual Report 2017 (AR) and the GSH Corporate Website (Web).

Disclosure Number	Disclosure Title	Page Reference & Remarks	
<b>GRI 102 : General Disclosures</b>			
Organizational profile	102-1	Name of organization	• 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 66)
	102-4	Location of operations	• AR: Our Footprint (Page 5) • AR: Our Property Portfolio (Pages 16-23) • AR: Subsidiaries Note 6 to the Financial Statements (Pages 90-91) • Web: <a href="http://www.gshcorporation.com/our_business_property_dev.html">www.gshcorporation.com/our_business_property_dev.html</a> • Web: <a href="http://www.gshcorporation.com/our_business_hospitality.html">www.gshcorporation.com/our_business_hospitality.html</a>
	102-5	Ownership and legal form	• AR: Domicile and Activities Note 1 to the Financial Statements (Page 66)
	102-6	Markets served	• AR: Operating Segments Note 25 to the Financial Statements (Pages 112-113)
	102-7	Scale of organization	• AR: Corporate Profile (Page 1) • AR: Operating Segments Note 25 to the Financial Statements (Pages 112-113)
	102-8	Information on employees and other workers	• SR: Empowering Lives (Page 12)
	102-9	Supply chain	• SR: Responsible Business (Pages 8-9)
	102-10	Significant changes to the organization and its supply chain	• Web: <a href="http://www.gshcorporation.com/our_company.html">www.gshcorporation.com/our_company.html</a>
	102-11	Precautionary principle or approach	• AR: Corporate Governance Report (Pages 26-47)
	102-12	External initiatives	• Not applicable
	102-13	Membership of associations	• Not applicable
Strategy	102-14	Statement from senior decision-maker	• AR: Message to Shareholders (pages 6-8) • Web: <a href="http://www.gshcorporation.com/ir_message_to_shareholders.html">www.gshcorporation.com/ir_message_to_shareholders.html</a>
	102-15	Key impacts, risks, and opportunities	• AR: At A Glance (Pages 2-3) • AR: Independent Auditors Report (Pages 52-57)
Ethics and integrity	102-16	Values, principles, standards, and norms of behavior	• SR: Sustainability Strategy (Page 7) • Web: <a href="http://www.gshcorporation.com/our_company_mission_vision.html">www.gshcorporation.com/our_company_mission_vision.html</a>
	102-17	Mechanisms for advice and concerns about ethics	• AR: Corporate Governance Report (Pages 26-47)



Disclosure Number	Disclosure Title	Page Reference & Remarks	
<b>GRI 102 : General Disclosures</b>			
Governance	102-18	Governance structure	• AR: Corporate Governance Report (Pages 26-47)
	102-19	Delegating authority	• AR: Corporate Governance Report (Pages 26-47)
	102-20	Executive-level responsibility for economic, environmental, and social topics	• SR: Sustainability Organizational Structure (Page 6)
	102-21	Consulting stakeholders on economic, environmental, and social topics	• SR: Consulting Our Stakeholders (Page 16)
	102-22	Composition of the highest governance body and its committees	• AR: Corporate Governance Report (Pages 26-47)
	102-23	Chair of the highest governance body	• AR: Corporate Governance Report (Pages 26-47)
	102-24	Nominating and selecting the highest governance body	• AR: Corporate Governance Report (Pages 26-47)
	102-25	Conflicts of interest	• AR: Corporate Governance Report (Pages 26-47) • AR: Statistics of Shareholdings (Pages 133-134) • AR: Directors' Statement (Pages 48-51) • SR: Sustainability Strategy (Page 7)
	102-26	Role of highest governance body in setting purpose, values, and strategy	• AR: Corporate Governance Report (Pages 26-47)
	102-27	Collective knowledge of highest governance body	• AR: Corporate Governance Report (Pages 26-47)
	102-28	Evaluating the highest governance body's performance	• AR: Corporate Governance Report (Pages 26-47)
	102-29	Identifying and managing economic, environmental, and social impacts	• SR: Sustainability Materiality Matrix (Page 7)
	102-30	Effectiveness of risk management processes	• AR: Corporate Governance Report (Pages 26-47)
	102-31	Review of economic, environmental, and social topics	• SR: Sustainability Report (Pages 1-24)
	102-32	Highest governance body's role in sustainability reporting	• SR: Sustainability Organizational Structure (Page 6)
	102-33	Communicating critical concerns	• SR: Sustainability Materiality Matrix (Page 7)
	102-34	Nature and total number of critical concerns	• SR: Sustainability Materiality Matrix (Page 7)
	102-35	Remuneration policies	• AR: Corporate Governance Report (Pages 26-47)
	102-36	Process for determining remuneration	• AR: Corporate Governance Report (Pages 26-47)
	102-37	Stakeholders' involvement in remuneration	• AR: Corporate Governance Report (Pages 26-47)
102-38	Annual total compensation ratio	• AR: Corporate Governance Report (Pages 26-47)	
102-39	Percentage increase in annual total compensation ratio	• AR: Corporate Governance Report (Pages 26-47)	

Disclosure Number	Disclosure Title	Page Reference & Remarks	
<b>GRI 102 : General Disclosures</b>			
Stakeholder engagement	102-40	List of stakeholder groups	• SR: Consulting Our Stakeholders (Page 16)
	102-41	Collective bargaining agreements	• Not applicable
	102-42	Identifying and selecting stakeholders	• SR: Consulting Our Stakeholders (Page 16)
	102-43	Approach to stakeholder engagement	• SR: Sustainability Strategy (Page 7)
	102-44	Key topics and concerns raised	• SR: Consulting Our Stakeholders (Page 16)
Reporting practice	102-45	Entities included in the consolidated financial statements	• AR: Subsidiaries Note 6 to the Financial Statements (Pages 90-91) • AR: Associate Note 7 to the Financial Statements (Pages 92-93)
	102-46	Defining report content and topic Boundaries	• SR: Sustainability Materiality Matrix (Page 7)
	102-47	List of material topics	• SR: Sustainability Materiality Matrix (Page 7)
	102-48	Restatements of information	• Not applicable
	102-49	Changes in reporting	• Not applicable
	102-50	Reporting period	• SR: Scope of Report (Page 2)
	102-51	Date of most recent report	• Not applicable
	102-52	Reporting cycle	• Annual
	102-53	Contact point for questions regarding the report	• SR: Scope of Report (Page 2)
	102-54	Claims of reporting in accordance with the GRI Standards	• SR: Scope of Report (Page 2)
	102-55	GRI content index	• SR: GRI Content Index (Pages 17-24)
	102-56	External assurance	• No external assurance
	<b>GRI 200 : Economic Disclosures</b>		
Economic performance	201-1	Direct economic value generated and distributed	• SR: Sustainability Scorecard (Page 14-15)
	201-2	Financial implications and other risks and opportunities due to climate change	• Not applicable
	201-3	Defined benefit plan obligations and other retirement plans	• Not applicable
	201-4	Financial assistance received from government	• Not applicable
Market presence	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	• Not applicable
	202-2	Proportion of senior management hired from local community	• Not applicable



Disclosure Number	Disclosure Title	Page Reference & Remarks	
<b>GRI 200 : Economic Disclosures</b>			
Indirect economic impacts	203-1	Infrastructure investments and services supported	• Not applicable
	203-2	Significant indirect economic impacts	• Not applicable
Procurement practices	204-1	Proportion of spending on local suppliers	• SR: Responsible Business (Pages 8-9)
Anti corruption	205-1	Operations assessed for risks related to corruption	• Not applicable
	205-2	Communication and training about anti-corruption policies and procedures	• Not applicable
	205-3	Confirmed incidents of corruption and actions taken	• There is no incidences of corruption
Anti competitive behavior	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</b>			
Materials	301-1	Materials used by weight or volume	• Not applicable
	301-2	Recycled input materials used	• Not applicable
	301-3	Reclaimed products and their packaging materials	• Not applicable
Energy	302-1	Energy consumption within the organization	• SR: Environmental Sustainability (Pages 10-11)
	302-2	Energy consumption outside of the organization	• Not applicable
	302-3	Energy intensity	• SR: Environmental Sustainability (Pages 10-11) • SR: Sustainability Scorecard (Pages 14-15)
	302-4	Reduction of energy consumption	• SR: Environmental Sustainability (Pages 10-11)
	302-5	Reductions in energy requirements of products and services	• Not applicable
Water	303-1	Water withdrawal by source	• Not applicable
	303-2	Water sources significantly affected by withdrawal of water	• Not applicable
	303-3	Water recycled and reused	• SR: Environmental Sustainability (Pages 10-11) • SR: Sustainability Scorecard (Pages 14-15)

Disclosure Number	Disclosure Title	Page Reference & Remarks
<b>GRI 300 : Environment Disclosures</b>		
Biodiversity	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas
	304-2	Significant impacts of activities, products, and services on biodiversity
	304-3	Habitats protected or restored
	304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations
Emissions	305-1	Direct (Scope 1) GHG emissions
	305-2	Energy indirect (Scope 2) GHG emissions
	305-3	Other indirect (Scope 3) GHG emissions
	305-4	GHG emissions intensity
	305-5	Reduction of GHG emissions
	305-6	Emissions of ozone-depleting substances (ODS)
	305-7	Nitrogen oxides (NO <sub>x</sub> ), sulfur oxides (SO <sub>x</sub> ), and other significant air emissions
Effluents and waste	306-1	Water discharge by quality and destination
	306-2	Waste by type and disposal method
	306-3	Significant spills
	306-4	Transport of hazardous waste
	306-5	Water bodies affected by water discharges and/or runoff
Laws and regulations	307-1	Non-compliance with environmental laws and regulations
Supplier environmental assessments	308-1	New suppliers that were screened using environmental criteria



Disclosure Number	Disclosure Title	Page Reference & Remarks	
GRI 400: Social disclosures			
Employment	401-1	New employee hires and employee turnover	• Not applicable
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	• Not applicable
	401-3	Parental leave	• Not applicable
Labor / management relations	402-1	Minimum notice periods regarding operational changes	• Not applicable
Occupational health and safety	403-1	Workers representation in formal joint management-worker health and safety committees	• Not applicable
	403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	• SR: Green Building (Pages 13)
	403-3	Workers with high incidence or high risk of diseases related to their occupation	• Not applicable
	403-4	Health and safety topics covered in formal agreements with trade unions	• Not applicable
Training and education	404-1	Average hours of training per year per employee	• SR: Empowering Lives (Page 12) • SR: Sustainability Scorecard (Pages 14-15)
	404-2	Programs for upgrading employee skills and transition assistance programs	• SR: Empowering Lives (Page 12)
	404-3	Percentage of employees receiving regular performance and career development reviews	• Not applicable
Diversity and equal opportunity	405-1	Diversity of governance bodies and employees	• Not applicable
	405-2	Ratio of basic salary and remuneration of women to men	• Not applicable
Non-discrimination	406-1	Incidents of discrimination and corrective actions taken	• Not applicable
Freedom of association and collective bargaining	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	• Not applicable

Disclosure Number	Disclosure Title	Page Reference & Remarks
GRI 400: Social disclosures		
Child labor	408-1 Operations and suppliers at significant risk for incidents of child labor	• Child labour is strictly prohibited
Forced or compulsory labor	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	• Forced and compulsory labour is strictly prohibited
Security practices	410-1 Security personnel trained in human rights policies or procedures	• Not applicable
Rights of indigenous peoples	411-1 Incidents of violations involving rights of indigenous peoples	• Not applicable
	412-1 Operations that have been subject to human rights reviews or impact assessments	• Not applicable
Human rights assessment	412-2 Employee training on human rights policies or procedures	• Not applicable
	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	• Not applicable
	413-1 Operations with local community engagement, impact assessments, and development programs	• SR: Empowering Lives (Page 12)
	413-2 Operations with significant actual and potential negative impacts on local communities	• Not applicable
Supplier social assessment	414-1 New suppliers that were screened using social criteria	• Not applicable
	414-2 Negative social impacts in the supply chain and actions taken	• Not applicable
Public policy	415-1 Political contributions	• Not applicable



Disclosure Number	Disclosure Title	Page Reference & Remarks
GRI 400: Social disclosures		
Customer health and safety	416-1	Assessment of the health and safety impacts of product and service categories
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services
Marketing and labeling	417-1	Requirements for product and service information and labeling
	417-2	Incidents of non-compliance concerning product and service information and labeling
	417-3	Incidents of non-compliance concerning marketing communications
Customer privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data
Socioeconomic compliance	419-1	Non-compliance with laws and regulations in the social and economic area









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