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## **Board's Statement**

Dear Stakeholders,

We are pleased to present our sustainability report, which kick-starts our journey towards a structured approach of reporting the key material aspects of sustainability and how they impact on Environment, Social and Governance ("ESG") factors which we believe are of interest to our stakeholders.

The outlook for the coal industry remains positive for the foreseeable future and with China's regulations in fighting pollution, we recognise that sustainability plays an important role in our business while we pursue our objectives. Environmental and social aspects contribute to the management of the Group's operations, interactions with our suppliers and customers as well as engaging our people. We are constantly looking out for opportunities to work with our suppliers, customers and employees on embarking on the journey of a more holistic and sustainable business with us.

### A PATH TO SUSTAINABILITY GROWTH

The Group has delivered another year of positive development in FY2017, due to favourable operating environment during the financial year, particularly in the coal trading segment. Our subsidiary, Orion Energy Resources Pte. Ltd. ("Orion"), has contributed to the Group's revenue and profit after tax in the amounts of RMB306.7 million and RMB28.3 million respectively.

### LOOKING TO THE FUTURE

Going forward, the principal business activities of the Group shall be the sales and trading of minerals and logistics management, as well as property development and property investment. The Group is looking to expand its existing core businesses to include the marine and shipping logistics business ("Logistics Business") and investments in the technology sector ("Technology Business").

In line with the Singapore Exchange Securities Trading Limited ("SGX-ST") new guidelines, the Board has taken up the responsibility for overseeing the Group's ESG initiatives. The Board has considered the sustainability topics and determined the material ESG factors that are crucial to the Group. This Sustainability Report plays an imperative role in helping us increase transparency, accountability and progress towards sustainable growth. As we proceed to venture into new markets, we remain vigilant in conducting our business and actively engage with our stakeholders to meet their concerns and needs. The success of our sustainability journey requires continual effort and we are confident that together with our stakeholders, we are able to achieve greater sustainability in our operations.

#### ACKNOWLEGDEMENTS

We would like to also take this opportunity to express our gratitude to the directors and business partners for their unwavering commitment and dedication this past year. We look forward to crossing new challenges and scaling greater heights together in the year ahead.

Mr Chu Ming Kin Executive Chairman & CEO

Sincap Group Limited

## **About Sincap Group**

VISION		g example for the inable coal trading.
household of the time, with the u	ach and every e world, one at a ise of sustainable -coal	MISSION

Sincap Group (SGX: 5UN) is one of the forerunners in thermal coal trading. We oversee the whole process from sourcing of coal from Indonesia to delivery of such coal to end customers, which offers convenience for our customers. Our core strategy in the commodities trading market is to have strong relations with our suppliers and customers.

Our most valuable asset is therefore our network of suppliers and customers, of whom we have established good business relationships with. The Group possesses profound knowledge of Indonesian coal suppliers and buyers from China. These factors combine to give the Group a competitive advantage over other coal producers and traders. FINANCIAL HIGHLIGHTS FY2017 (RMB million)

Revenue **306,737** 

Corporate Taxes 5,575

Net Profit After Tax **17,426** 

Tonnage I,196,000 metric tonnes

## **About This Report**

Sincap Group Limited ("the Group") is listed on the Catalist of the SGX-ST. This Sustainability Report provides an annual update on important non-financial topics within the Group's global operations and majority owned subsidiaries for the financial year ending 31 December 2017.

The scope of this report covers the financial year from January to December 2017. As Global Reporting Initiative ("GRI") standards is the global standard for sustainability reporting, our sustainability report has been prepared in accordance with the GRI standards, Core. Unless otherwise stated, the report covers the ESG performance of the Group across its core operations in Indonesia, China and Singapore.

This report serves multiple communication functions. It enhances our internal efforts towards transparency and disclosure and supports communication with many of our external stakeholders. As part of our continued efforts to improve our reporting, we welcome stakeholders to submit their feedback to info@sincapgroup.com.sg.

Stakeholder	Platforms	Frequency	Key Feedback/ Issue	Commitments to Sustainability
Employees	Interviews Performance share plan Flexible working hours Staff Training	Annual Ad-hoc Ad-hoc Ad-hoc	<ul> <li>Employee safety and welfare</li> <li>Staff training and development opportunities</li> <li>Work-life balance</li> <li>Remuneration and benefits</li> <li>Fair and competitive employment practices</li> </ul>	<ul> <li>Provide fair and equal opportunities to all employees</li> <li>Rewarding performance</li> <li>Create a safe and cohesive working environment</li> </ul>
Investors and Media	Annual extraordinary/ general meetings Financial results announcements SGX announcements, media release and interviews Annual report, sustainability report Company website	Annual Half - yearly Ad-hoc Annual Perpetual	<ul> <li>Return on investment</li> <li>Business growth</li> <li>Business strategy and outlook</li> <li>Risk management</li> <li>Corporate governance</li> <li>Compliance to listing requirements</li> <li>Sustainability performance and reporting standards</li> <li>Timely and transparent reporting</li> </ul>	<ul> <li>Strive to generate sustainable long-term returns on investment</li> <li>Adhere to timely and transparent dissemination of accurate and relevant information to the market</li> </ul>
Government/ National Agencies	Sustainability report Meetings, briefings and regular reporting	Annual Annual	<ul> <li>Stakeholder programmes to advocate greener operator behaviour</li> <li>Providing training and skills-upgrading</li> </ul>	<ul> <li>Strict compliance with relevant laws and regulations</li> <li>Encouraging life-long learning for mid-career change and skills- upgrading</li> </ul>
The Community Customers	Sustainability report Quality assurance inspections	Annual Perpetual	<ul> <li>Advocating sustainable practices</li> <li>Ensuring consistency in quality of coal sold to customers</li> </ul>	<ul> <li>Management of impacts on the community</li> <li>Generating long-term sustainable returns through customer confidence for Group's high standards of products</li> </ul>

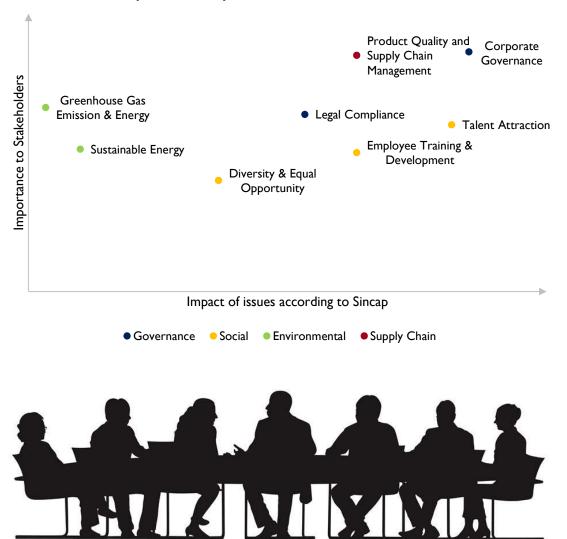
# **Stakeholder Engagement**

## **Materiality Assessment**

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

The materiality review considered the Global Reporting Initiative (GRI) guidelines and we have prioritised our topics using a materiality matrix. The matrix considers the potential impact of each topic on our business and its significance to stakeholders. In the conduct of the assessment, inputs from stakeholders and independent sustainability consultant were considered.

Our review focuses on 4 key aspects with 8 identified material topics. For each material topic, we report on the relevance of it to our business and stakeholders, and the measures in place to address it.



### 2017 Sustainability Materiality Assessment

# **Material Topics- At A Glance**

Material Topics	Relevance	How are we addressing issue
Governance Dimensions		
Corporate Governance	Apart from maintaining business profitability, we understand that stakeholders are also concerned with the sustainability of our returns. Establishing a strong foundation for good corporate governance is fundamental in addressing stakeholders' concerns over the sustainability of the Group's future.	We seek to uphold the highest standard of corporate governance and comply with all regulatory requirements. The Board have implemented a committee structure that enables separation of duties and segregation of responsibilities of the directors to focus on critical functions.
Legal Compliance	With business activities in Greater China and Indonesia, we are subjected to regulations of the abovementioned countries. Furthermore, as a Company listed on Catalist Board of Singapore Exchange and we are required SGX Listing Rules and various other guidelines. Failure to comply with these regulations could pose a threat to business continuity.	The Chief Executive Officer (CEO), Chief Financial Officer (CFO) and Group General Manager are experienced with regulatory compliances of the various judiciaries that the Group operates in and are actively monitoring and diligence in meeting all regulatory requirements.
Social Dimensions		
Social Dimensions Diverse and Equal Opportunity		Our hiring process does not prejudice against any ethnic group, nationality or gender.

Material Topics	Relevance	How are we addressing issue
Employee Training and Development	Creating the right environment to nurture our employees is crucial to the success of our business.	We conduct internal training and development programs to keep our employees abreast of industry standards.
Talent Attraction	We recognise the importance of a competitive compensation and benefit scheme in attracting and retaining talents.	We ensure that we provide a fair and equitable compensation package for all employees that is based on merit.
<b>Environmental Dimensions</b>		
Greenhouse Gas Emission and Energy	The Group acknowledges that investing in energy conservation reduces our carbon footprints and contributes to cost savings.	We commenced energy consumption tracking at our Singapore office and increased awareness of our electricity usage.
Sustainable Energy	The Group trades thermal coal which is known to contain lower sulphur content as compared to other types of coal and has a significantly lesser impact on the environment.	We intend to introduce thermal coal to other parts of China in an attempt to encourage the use of the eco- friendlier coal. Furthermore, the Group plans to extend its outreach to other countries with high energy consumption, such as India.
Supply Chain Dimensions		
Product Quality and Supply Chain Management	We take steps to ensure that the quality of our supplies exceeds both industry and customers expectations.	The Group has engaged professionals to conduct batch testing on coal from our suppliers.

### Governance

We believe that upholding our reputation and fostering stakeholders' trust in our business is fundamental to our Group's growth. Therefore, our Board of Directors are committed to building and upholding a high level of corporate governance within the Group. With a total of 5 directors, 4 of whom are Independent Directors (as at 31 December 2017), the Board is responsible for the strategic direction of the Group as well as building a positive corporate image through exemplary corporate governance and business ethics.



#### Corporate Governance

The Board recognises the significance of good corporate governance and have implemented a committee structure that enables separation of duties and segregation of responsibilities to focus on critical functions.

The Audit and Risk Committee ("ARC") oversees financial aspects of the Group, such as financial accounting and reporting obligations. The ARC is also responsible for managing the external and internal auditors, as well as assess the adequacy of the Group's internal controls and risk management system. Sincap has zero tolerance towards corruption and fraud and have dedicated ourselves to operate with integrity. We have also implemented whistleblowing policy to ensure that inappropriate and unethical conduct can be reported through official channels.

We strive to have zero litigation by operating in accordance with its statutory and regulatory requirements.

The Nominating Committee ("NC") is responsible for reviewing the independence of each Director on an annual basis. On an annual basis, the NC reviews the constitution of the Board, ensuring that there is a suitable mix of expertise and knowledge so that the Board as a collective whole possesses the essential core competencies for effective function and informed decision making.

The Remuneration Committee ("RC") responsibilities include recommending a remuneration structure for the Board and key management personnel. Remuneration of employees are reviewed annually to ascertain that their compensation packages are consistent with staff remuneration guidelines and correspond with their respective job scopes and level of responsibilities.

The directors actively assist in developing future business strategies, evaluate the performance of management in meeting targeted goals and objectives, and oversee the reporting of performance. The maintenance of a legal and ethical environment fostered by good corporate governance will in turn help in promoting and preserving the interests of all stakeholders, which is evident by the absence of corruption in the Group.

The Group has also established a whistleblowing policy to provide a channel for anonymous feedback for unlawful and unethical behaviour.

For further details, please refer to our Corporate Governance Report in our Annual Report 2017 page 10 to 42.

#### Legal Compliance

The Group adheres to all rules and regulations regardless of the different jurisdictions we operate in. Abiding by the respective rules and regulations, the Group has not been fined for any non-compliance. Our Chief Executive Officer (CEO), Chief Financial Officer (CFO) Group General Manager are experienced with regulatory compliances of the various judiciaries that the Group operates in and are actively monitoring and diligence in meeting all regulatory requirements.

### Social

We believe that decisions on recruitment and staff are crucial in ensuring that the right people are placed in roles that complement their expertise. As a result, employees will have a higher degree of job engagement. Subsequently, synergies between the employees will occur which will enhance their capabilities. With that, each employee can contribute more to the Group, society and at the same time, the environment. Diversity is valued and we respect the rights of each and every employee. We recognise that career advancement, recognition, personal development and compensation are key factors in talent attraction and retention.

#### **Diverse and Equal Opportunity**

We believe that a vibrant and inclusive labour force is fundamental. Employees from different backgrounds, skills and knowledge enable us to serve our customers and liaise with our suppliers, forging closer relationships with them.

We have an equitable remuneration structure for employees regardless of gender, age or ethnicity. All compensation packages offered to employees are based on merit. Our hiring process does not prejudice against any ethnic group, nationality or gender. The breakdown of our manpower is as follows:

By Age	
55 and above	-
31 to 55	50%
30 and below	50%

By Gender			
Male	75%		
Female	25%		

By Nationality	
Southeast Asia	50%
North Asia	25%
South Central Asia	25%



At Sincap, we believe each and every one should receive the same opportunities regardless of race, gender and nationality. With more diverse pool of talents, we will be able to generate more ideas and work towards a better future.

Sincap also believes in retaining talent. This is achieved through reasonable compensation package and a wide range of opportunities for growth.



Team Bonding Session

#### **Employee Training and Development**

We conduct internal training and development programs to keep our employees abreast of industry standards. We also have onboarding programmes for new employees depending on their role and job functions, to ensure them having the necessary skills, knowledge and behaviours to become effective contributors to the Group.

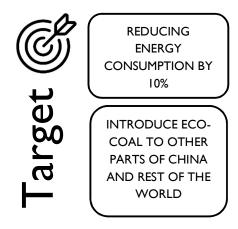
#### **Talent Attraction**

We recognise the importance of a competitive compensation and benefit scheme in attracting and retaining talents. Therefore, we ensure that we provide a fair and equitable compensation package for all employees that is based on merit. The Group has an annual performance appraisal system put in place to periodically review the work performance of its employees and is used as a basis for the annual salary review exercise. The performance appraisal also serves as a platform for open communication between the employees and their direct supervisors. Our employee benefits and human resource policies are also always being reviewed to ensure that they are competitive and aligned with manpower regulations in the jurisdictions we operate in.

The Group also provides benefits such as medical benefits and parental leave to all employees, regardless of race, gender or religion. All employees are entitled to claim full medical expenses incurred due to general illness. The Group also offers employees with flexible working hours. With that, employees are given the choice to work from home should they require to spend more time with their families.

## **Environmental**

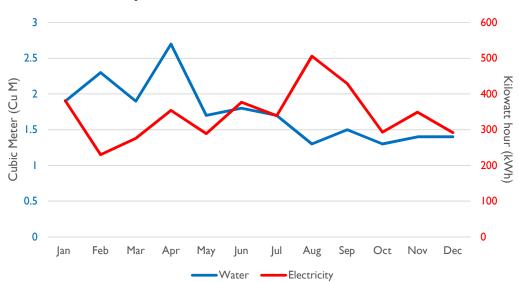
As our core business mainly relates to the trading of natural resources, the Group understands the gravity of managing the impact that our operations have on the environmental. Resource depletion, among other consequences such as pollution, are some of the strains on the environment caused by the production and transportation of the Group's traded commodities. Being an avid supporter for a greener and more sustainable future, we are committed to managing and minimising our ecological footprint across our value chain.



#### Greenhouse Gas Emission and Energy

The Group acknowledges that investing in energy conservation not only reduces our carbon footprint but will simultaneously aid in our cost savings. Hence, we are committed to taking measures in minimising our overall energy consumption and improving energy efficiency to reduce the environmental impact of our operations. On this note, we are proud to report that we have retrofitted conventional fluorescent bulbs with more energy efficient LED lightings at our office. Our utilities consumption at our Singapore office for the period under review is as follows: We commit ourselves to applying the precautionary principle when engaging in any environmental challenges that Sincap faces.

At Sincap, we aim to reduce our energy consumption by 10% in 2020. Through our expertise, we hope to promote the use of environmentally friendlier sources of energy. It is our desire to introduce the use of eco-coal to more parts of China and other countries that have a high level of energy consumption.



**Utilities Consumption for 2017** 

The Group aims to reduce overseas business travel and encourage the use of video conferencing. With that in mind, the Group has hired an Indonesian resident in 2018, whose main responsibility is to oversee transactions occurring in Indonesia. The CEO will hence be able to set up conference calls with the Indonesian employee in order to gain insight to the operations in Indonesia without having the need to travel there personally and thus reducing the carbon footprints.

In the Singapore office, we encourage our employees to be eco-friendlier by making conscious effort throughout their daily operations. Employees are frequently reminded to reuse unwanted paper should they be only printed on one-side.

#### Sustainable Energy

Thermal coal is regarded to have a relatively high calorific value, producing approximately 18.8 to 29.3 mega joules of energy per kilogram, as compared to sub-bituminous coal which produces

approximately 8.3 to 25 mega joules of energy per kilogram. With its lower sulphur content as compared to other types of coal, thermal coal has a significantly lesser impact on the environment.

Recognising the advantages of thermal coal, the Group refocused their business direction towards the trading of thermal coal to satisfy the growing demand for energy in China, without increasing the burden on the environment. To date, the Group has completely divested its gypsum and alumina trading operations to fully invest their resources into thermal coal trading.

The Group currently markets its thermal coals into China, which has one of the largest energy consumptions in the world. Consequently, the generation of electricity in China bears less environmental impact. The Group thereby intends to introduce thermal coal to other parts of China in an attempt to encourage the use of the eco-friendlier coal. Furthermore, the Group plans to extend its outreach to other countries with high energy consumption, such as India.

### **Supply Chain**

We believe with a thorough knowledge of our trade flows, we will be better able to create value for both customers and the society. Therefore, we have implemented robust due diligence and monitoring to evaluate and handle potential risks and social impact from our supply chains.

#### Product Quality and Supply Chain Management

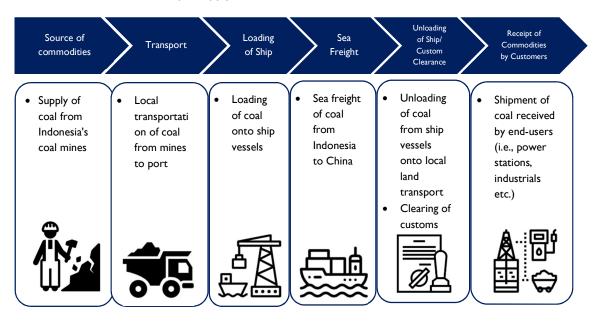
The Group has engaged a third-party testing agency, PT. Jasa Inspeksi Dan Sertifikasi Indonesia, to conduct batch testing on coal from our suppliers. This is to ensure that the grade of coal exceeds our customers' expectations and comply with the American Society for Testing and Materials (ASTM) standards and the International Organization for Standardization (ISO standards).





It is Sincap's belief that regardless of the nature of our operations, the good management of our supply chain remains a vital role in achieving sustainability and high levels of stakeholder management.

Aside from being a mere trader of coal with our suppliers, Sincap aims to be more involved in the suppliers' mining activities. This will include having higher intensity of supplier engagement and helping suppliers to be more environmentally friendly by giving them information/ training on how to mine coal sustainably. A brief overview of the Group's supply chain is shown as below:



The Group is also exploring and expanding its logistics and transportation capabilities with the desire of reducing their impact on the environment. This includes providing logistics services for dry bulk commodities from neighbouring regional countries. Likewise, the Group intends to assist smaller players in the industry (e.g. smaller scale supplier/customers) in the exportation and/or importation of goods. By making themselves available for joint shipment, the Group will contribute to the reduction of trips that shipping vessels will have to make by ensuring that each ship carries the maximum load permissible. Consequentially, emission of greenhouses gases into the environment will be reduced.

## **GRI Content Index**

GRI STANDARDS	Disclosure No.	Disclosure Title	Cross-Reference Annual Report (AR) Sustainability Report (SR)	Page
		General Standards Discl		
I. Organizational profile	Disclosure	Name of the organization	AR- Corporate Profile	I
	Disclosure	Activities, brands, products, and services	AR- Corporate Profile Company's Website	I
	Disclosure 102-3	Location of headquarters	AR- Corporate Information Company's Website - Contact us	8
	Disclosure 102-4	Location of operations	AR- Corporate Profile Company's Website - Global Presence	I
	Disclosure 102-5	Ownership and legal form	AR- Corporate Structure	I
	Disclosure 102-6	Markets served	AR- Corporate Profile Company's Website - Business Activities AR- Notes to FS (segment	96
			information)	
	Disclosure 102-7	Scale of the organization	AR- Financial and Operation Review Company's Website - Investor Relations	2
	Disclosure 102-8	Information on employees and other workers	SR- Social	8
	Disclosure 102-9	Supply chain	SR- Supply Chain	12
	Disclosure 102-10	Significant changes to the organization and its supply chain	AR- Financial and Operation Review	2
	Disclosure 102-11	Precautionary Principle or approach	SR- Governance	6
2. Strategy	Disclosure 102-14	Statement from senior decision-maker	SR- Board Statement	I
	Disclosure 102-15	Key impacts, risks, and opportunities	SR- Materiality Assessment	5-7
3. Ethics and integrity	Disclosure 102-16	Values, principles, standards, and norms of behavior	SR- Governance SR- Social SR- Environmental SR- Supply Chain	8 9 10 12
4. Governance	Disclosure 102-18	Governance structure	AR- Board of directors, Key Management AR- Corporate Governance Report SR- Governance	5 10 8
	102-19	Delegating authority	AR- Corporate Governance Practices- Board Matters	10
	102-20	Executive-level responsibility for economic, environmental, and social topics	Chief Financial Officer (CFO)	-
	102-21	Consulting stakeholders on economic, environmental, and social topics	SR- Stakeholder Engagement	4
	102-22	Composition of the highest governance body and its committees	AR- Board of Directors AR- Corporate Governance Report	5

	102-23	Chair of the highest governance body	AR- Board of Directors	5
	102-24	Nominating and selecting the highest governance body	AR- Board of Directors AR- Corporate Governance Report- Nominating Committee	5
	102-25	Conflicts of interest	AR- Corporate Governance Report	10, 14
	102-26	Role of highest governance body in setting purpose, values, and strategy	AR- Board of Directors	5
	102-27	Collective knowledge of highest governance body	AR- Corporate Governance Report	12
	102-28	Evaluating the highest governance body's performance	AR- Corporate Governance Report- Training Board Performance	12 23
	102-29	Identifying and managing economic, environmental, and social impacts	AR- Corporate Governance Report- Audit and risk committee	32-33
	102-30	Effectiveness of risk management processes	AR- Corporate Governance Report- Audit and risk committee	32-33
	102-31	Review of economic, environmental, and social topics	AR- Corporate Governance Report- Audit and risk committee	32-33
	102-32	Highest governance body's role in sustainability reporting	AR- Board of Directors	5
	102-33	Communicating critical concerns	AR- Corporate Governance Report- Audit and risk committee	32-33
	102-35	Remuneration policies	AR- Corporate Governance Report- Remuneration matters Level and mix of remuneration Disclosure on remuneration	25-27 27-28 29-31
	102-36	Process for determining remuneration	AR- Corporate Governance Report- Remuneration matters Level and mix of remuneration Disclosure on remuneration	25-27 27-28 29-31
	102-37	Stakeholders' involvement in remuneration	AR- Corporate Governance Report- Remuneration matters Level and mix of remuneration Disclosure on remuneration	25-27 27-28 29-31
5. Stakeholder engagement	Disclosure 102-42	Identifying and selecting stakeholders	SR- Stakeholder Engagement	4
	Disclosure 102-43	Approach to stakeholder engagement	SR- Stakeholder Engagement	4
	Disclosure 102-44	Key topics and concerns raised	SR- Stakeholder Engagement	4
6. Reporting practice	Disclosure 102-45	Entities included in the consolidated financial statements	AR- Notes to FS: Investments in subsidiaries	80
	Disclosure 102-46	Defining report content and topic Boundaries	SR- About this Report SR- Materiality Assessment	3 5
	Disclosure 102-47	List of material topics	SR- Materiality Assessment	5

	Disclosure 102-48	Restatements of information	None. First-time implementing Sustainability Reporting	-
	Disclosure 102-49	Changes in reporting	None. First-time implementing Sustainability Reporting	-
	Disclosure 102-50	Reporting period	SR- About this Report	3
	Disclosure 102-51	Date of most recent report	None. First-time implementing Sustainability Reporting	-
	Disclosure 102-52	Reporting cycle	Annual	-
	Disclosure 102-53	Contact point for questions regarding the report	SR- About this Report	3
	Disclosure 102-54	Claims of reporting in accordance with the GRI Standards	SR- About this Report	3
	Disclosure 102-55	GRI content index	SR- GRI content Index	14-17
	Disclosure 102-56	External assurance	No external assurance	-
		Topic-specific disclosu	res	
GRI201: Economic	Disclosure	Direct economic value	AR- Financial and Operation Review	2
Performance	201-1	generated and distributed	AR- Consolidated income statement, Consolidated statement of cash flows	50
	201-4	Financial assistance received from government	None received	
GRI 205: Anti- Corruption	Disclosure 205-1	Operations assessed for risks related to corruption	SR- Governance	8-9
	Disclosure 205-2	Communication and training about anti-corruption policies and procedures	SR- Governance	8-9
	Disclosure 205-3	Confirmed incidents of corruption and actions taken	SR- Governance	8-9
GRI 206: Anti- Competitive Behaviour	Disclosure 206-1	Legal actions for anti- competitive behaviour, anti- trust, and monopoly practices	No reported cases during reported period.	-
GRI 302: Energy	Disclosure 302-1	Energy consumption within the organization	SR- Environment	10-11
	Disclosure 302-2	Energy consumption outside of the organization	SR- Environment	10-11
	Disclosure 302-3	Energy intensity	SR- Environment	10-11
	Disclosure 302-4	Reduction of energy consumption	SR- Environment	10-11
	Disclosure 304-2	Significant impacts of activities, products, and services on biodiversity	SR- Environment	10-11
GRI 307: Environmental Compliance	Disclosure 307-1	Non-compliance with environmental laws and regulations	SR- Environment	10-11
GRI 401: Employment	Disclosure 401-1	New employee hires and employee turnover	SR- Social	9-10
	Disclosure 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	SR- Social	9-10
	Disclosure 401-3	Parental leave	SR- Social	9-10

GRI 404: Training and Education	Disclosure 404-2	Programs for upgrading employee skills and transition assistance programs	SR- Social	9-10
	Disclosure 404-3	Percentage of employees receiving regular performance and career development reviews	SR- Social	9-10
GRI 405: Diversity and Equal Opportunity	Disclosure 405-1	Diversity of governance bodies and employees	AR- Board of Directors AR- Key Executives	5 6
GRI 406: Non- discrimination	Disclosure 406-1	Incidents of discrimination and corrective actions taken	SR- Social	9-10
GRI 407: Freedom of Association and Collective Bargaining	Disclosure 407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	No indication of occurrence during the reporting period	-
GRI 408: Child Labour	Disclosure 408-1	Operations and suppliers at significant risk for incidents of child labour	No indication of occurrence during the reporting period	-
GRI 409: Forced or Compulsory Labour	Disclosure 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	No indication of occurrence during the reporting period	-
GRI 415: Public Policy	Disclosure 415-1	Political contributions	None	-
GRI 416: Customer Health and Safety	Disclosure 416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	No indication of occurrence during the reporting period	-
GRI 417: Marketing and Labeling	Disclosure 417-1	Requirements for product and service information and labeling	SR- Supply Chain	12-13
GRI 418: Customer Privacy	Disclosure 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No indication of occurrence during the reporting period	-
GRI 419: Socioeconomic Compliance	Disclosure 419-1	Non-compliance with laws and regulations in the social and economic area	SR- Governance	6