

SUSTAINABILITY REPORT 2019

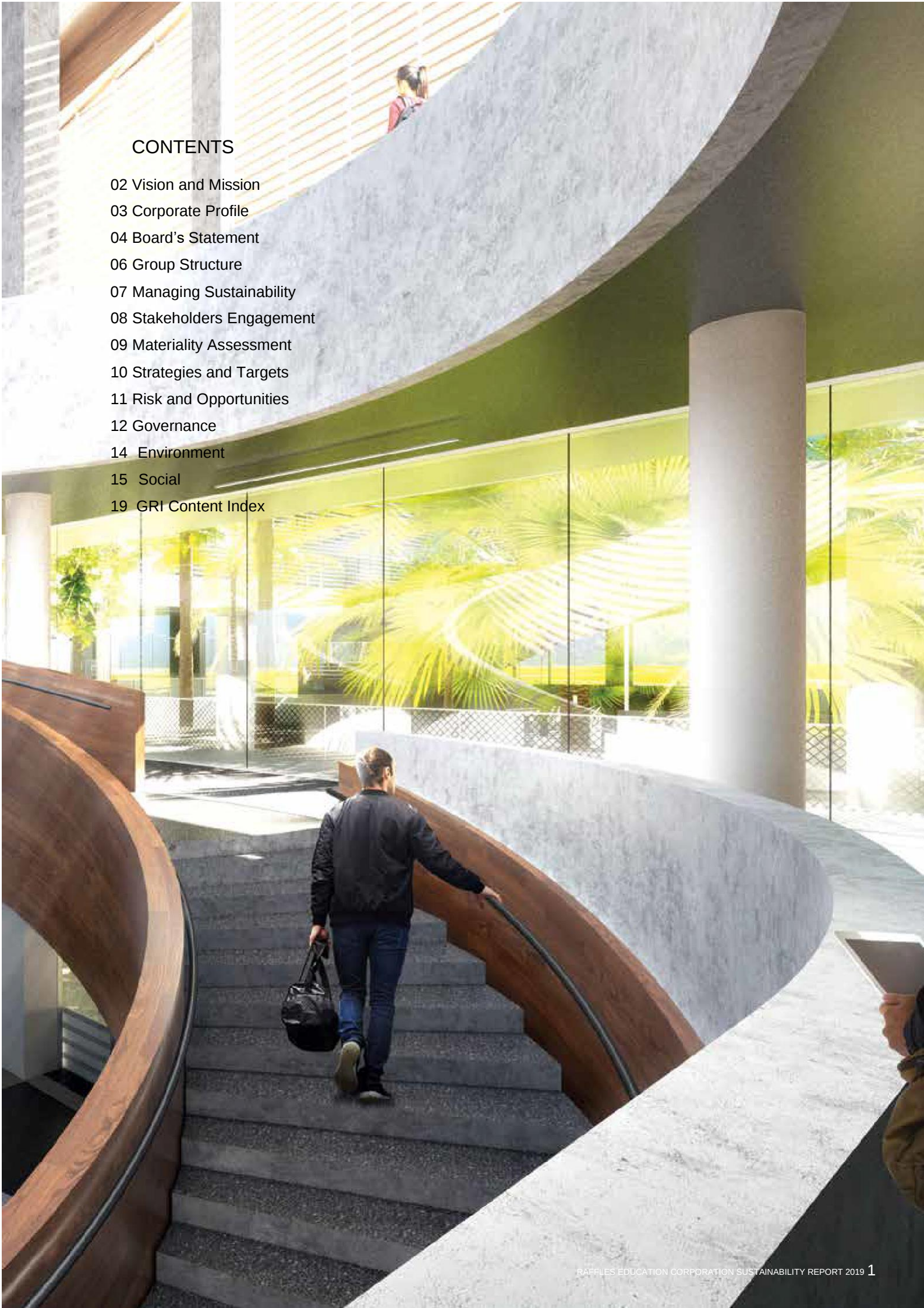
EDUCATING TOMORROW'S AVANT-GARDE



RafflesEducation



Artist Impression of
Raffles University, Iskandar

A photograph of a modern building interior. In the foreground, a man in a dark jacket and jeans is walking down a curved staircase with a wooden handrail, carrying a black bag. The staircase is made of grey concrete steps. To the right, there is a large glass wall that reflects the interior and shows a view of palm trees outside. The ceiling is curved and made of light-colored concrete. In the background, another person is visible on a higher level of the building.

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OUR VISION

Our vision is to be a premier education Group.

OUR MISSION

We are committed to provide quality education and education related services through our network of institutions and companies.

OUR VALUES & CULTURE

We provide a learning environment that leads to successful careers through educational experiences that promote:

- ï Social responsibility
- ï Professional excellence for employability
- ï Analytical thinking for problem solving
- ï Creativity to encourage innovation
- ï Entrepreneurship

Artist Impression of
Raffles University, Iskandar

CORPORATE PROFILE

RafflesEducation is a premier education Group.

Since establishing its first college in Singapore in 1990, RafflesEducation has grown to provide a full spectrum of education services through a vast network of 18 colleges and universities across 11 countries in Asia Pacific and Europe: Cambodia, India, Indonesia, Italy, Malaysia, Mongolia, Saudi Arabia, Singapore, Thailand and the People's Republic of China. More than 20,000 students enrolled in RafflesEducation's programmes benefit from a quality education that provides graduates with a well-rounded hands-on experience that is relevant to the industry.

The Group through its Hong Kong Stock Exchange listed subsidiary, Oriental University City (H.K.) Ltd., leases education facilities to 12 vocational and technical colleges offering a wide variety of vocational and technical courses catering to a student population of 16,000.



BOARD'S STATEMENT

In the face of a changing climate and a changing world, educational institutions play an important role as innovators and leaders in sustainability.

As the Board of Directors, we recognise the importance of sustainability and seek to contribute to our environment and society through our role as education provider and responsible corporate citizen.

To achieve our aim of having a productive relationship with our learners and to link education to the way people aspire to live and work every day, we are focused on three priorities: growing market share through our digital transformation; investing in growing market opportunities; and becoming a simpler, more efficient, and sustainable company.

Whether it's offering qualifications that help people get better jobs or providing products and services for learners who are struggling, our Sustainability Plan drives us to improve quality access to education, innovate in new ways, and reduce our environmental footprint. Sustainability is important to our company and to our stakeholders. Learners and educators expect our business to help improve access through our products and services. Our employees seek purpose in their jobs, and working toward sustainability objectives can help them find it. And our investors are increasingly interested in matters relating to environmental, social, and governance (ESG) criteria.

Furthermore, Higher Education Institutions have a pivotal role in disseminating and mainstreaming sustainability thinking within society. We aim at making our students (i.e., future managers, leaders, politicians and academics) capable of dealing with a large range of global and interlinked economic, environmental, and social issues in their future professional and personal lives.

Being green is no longer a cost of doing business; it is a catalyst for innovation, new market opportunity, and wealth creation. In a new green world, managers might redesign a product so that it uses fewer environmentally harmful or resource-depleting raw materials - an effort that if successful could result in cuts in direct manufacturing costs and inventory savings.

Raffles Education operate a network of design schools spread across many parts of the world. We aspire to and are working at devising farsighted and innovative teaching curriculum, creative solutions to address the environmental challenge. We intend to make sustainable development part of our higher education culture, and on ensuring the institutionalization of sustainable development in our Higher Education Institutions.

Present day business planning must take into consideration the power of unknown and unexpected externalities. It calls for the kind of management thinking that doesn't depend on charting known facts against other known facts. We must be willing to think high and wide.

We intend to incorporate the environment into our corporate strategic planning by taking the following measures:

1. Understand the critical environmental threats.
2. Determine how the company's activities contribute to them.
3. Implement a remedial program wherever pollution prevention pays.
4. Aim research to develop teaching methodologies to produce more environmentally benign processes and products.
5. Consider all new investments with environmental effects in mind.

Our Sustainability Plan serves to drive our commitment to integrating social and environmental issues into every aspect of our business.

Chew Hua Seng
Chairman & CEO

ABOUT THIS REPORT

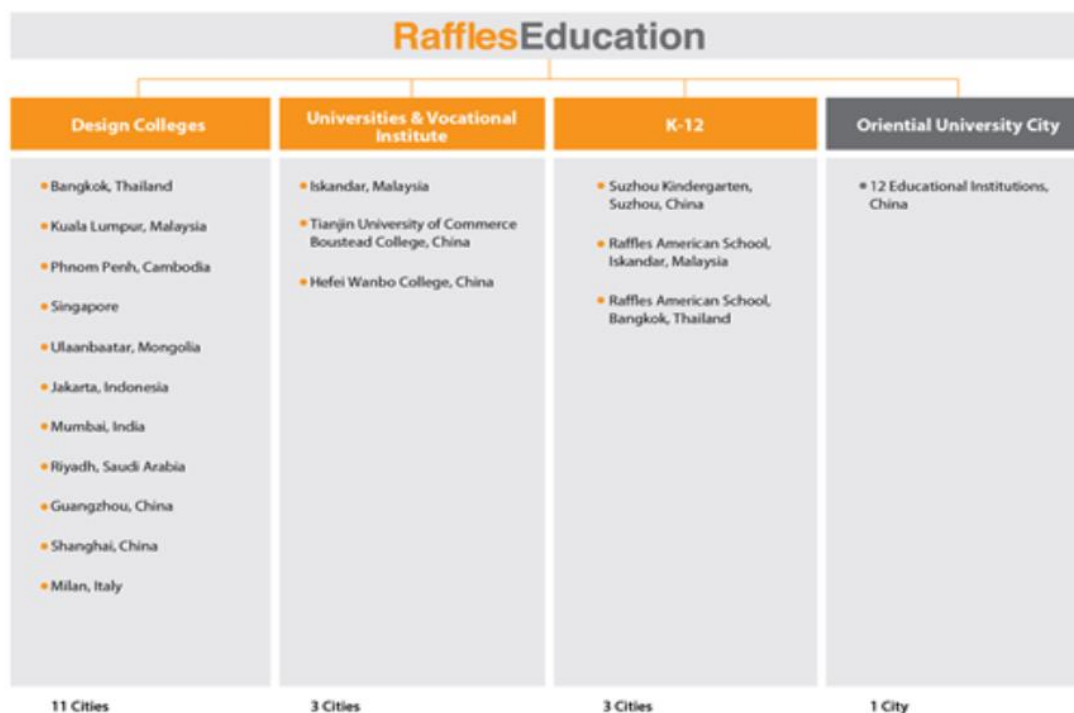
This is Raffles Education Corporation Limited second sustainability report and covers our performance and initiatives from 01 July 2018 to 30 June 2019. We have included in this Report, the performance and initiatives of all our key business operations drawing reference from the Global Reporting Initiative (“GRI”) standards (core option) and in accordance with SGX-ST Listing Rules (711A and 711B) on Sustainability Reporting Guide.

We have not obtained any independent assurance of the information being reported this year but will continue to work on enhancing our report processes and may consider obtaining independent assurance in the future.

We welcome feedback and comments for our report at IR@Raffles.education

GROUP STRUCTURE

The current Group Structure is as follows:



MANAGING SUSTAINABILITY

At RafflesEducation, sustainability is managed at all levels. RafflesEducation is committed to sustainability and incorporates the principles in ESG in setting its business strategies and operations.

Through performance, we adopt a long-term business perspective where we want to achieve added value and growth, for us and the society we are living in. We aim to be an employer of people who are keen to work for and with us.

Everyone, at every level in the organization plays a part in creating a responsible and sustainable business. We take responsibility to foster sustainable development of our company, our industry and the society we live in.

As a good corporate citizen, we also support the society we are part of. We use our resources as efficiently as possible and with transparent processes and collaborative business approach, we generate value and aim for continuous improvement throughout the entire value chain.

OUR DAY TO DAY MANAGEMENT OF SUSTAINABILITY

BOARD OF DIRECTORS



The Board of Directors sets the Group's risk appetite which determines the nature and extent of material risks that the Group is willing to take to achieve its strategic and business objectives. The Board is also responsible for the Group's sustainability plan, vision, strategy and performance.

SUSTAINABILITY STEERING COMMITTEE



The Sustainability Steering Committee is chaired by the Chairman of ESG of the Group as well as representatives from key business functions. They work together to identify and implement RafflesEducation's sustainability action plans and to monitor and assess our performance. The Sustainability Steering Committee reports to the Chairman & CEO of the Company.

GROUP MANAGERS AND CORPORATE DEPARTMENTS



Group managers and corporate departments are responsible for implementing relevant sustainability policies and action plans within their areas of business.

STAKEHOLDERS ENGAGEMENT

Stakeholders are group of people which RafflesEducation's business has a significant impact and who have vested interest in the Group's operations. Key stakeholders, among others, are the employees, investors and shareholders, customers, business associates, suppliers and the local community. Other groups including the regulators and key government agencies, non-governmental organisations (NGOs), private education committee and its' representatives, local community and the media. They are mapped into groups based on their impact on RafflesEducation.

Through the various engagement channels, RafflesEducation seeks to understand its stakeholders' views, communicate effectively with them and respond to their concerns.

We plan to engage more of our stakeholders in the coming years to better understand their material concerns and will provide report as and when we have more information. The evaluation of the results shaped the materiality analysis and would provide important insights into the direction of the Group's commitment to integrating social and environmental issues into every aspect of our business.

Stakeholder	Engagement Channel	Discussion Topic
Employee (People)	- Dialogue sessions with management - Employee engagement surveys - Online employee portal - Orientation/Induction and training - Volunteer programs - Company events	- Staff welfare - Performance appraisals - Compensation and benefits - Work-life balance
Investor (Shareholders, Investors, Business Associates)	- Annual General Meeting & Extraordinary Meeting - Quarterly financial results announcement - Annual reports and sustainability reports - Media releases - Surveys - Company websites	- Operational performance and efficiency - Cost saving initiatives - Business strategy and new ventures - Market outlook - Risk and opportunities
Customers (Students)	- Satisfaction surveys - Orientation/Induction - Helpdesk	- Teaching/Learning resources - Facilities and environment - Student grievances - General satisfaction - Support services
Community (Regulators, NGOs, Suppliers, Local community, Media)	- Sustainability reports - Adhere to statutory disclosures and requirements - Corporate advertisement - Media releases, press event - Participation in external conference - Health, Safety and Environment ("HSE") management - Supplier evaluation - Social media	- Stakeholder programme - Product quality - Support/Advocacy of best practices - Social and relationship - Occupational health and safety practices - Environmental compliances

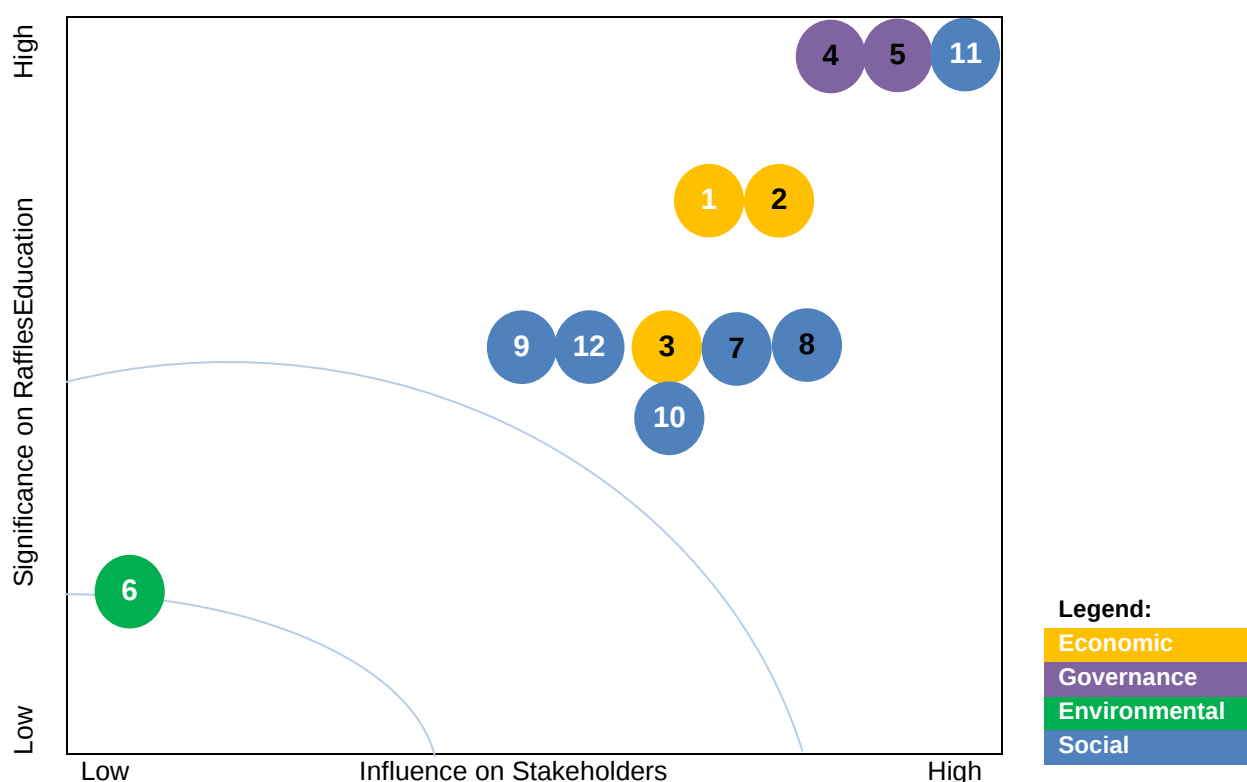
MATERIALITY ASSESSMENT

We have carried out our first materiality analysis on environmental, social and governance in 2018 to identify sustainability-related topics that are important to RafflesEducation and our stakeholders. These were subsequently reviewed in 2019.

The material ESG factors were identified and ranked based on significance topics to

RafflesEducation and our valued key stakeholders.

We are still in the process of understanding our baseline where the collection of quantitative data is required for reporting in line with the GRI standards and as such, we will continue to report on our performance in next subsequent reports.



1 Entrepreneurship and Empowerment	7 Training and Development
2 Innovation and Technology	8 Diversity and Equal Opportunity
3 Economic Contribution to Society	9 Stakeholder Engagement
4 Corporate Values and Code of Conduct	10 Customer Satisfaction
5 Anti-Corruption	11 Customer Data Privacy
6 Waste and Resource Management	12 Social-Economic Compliance

STRATEGIES AND TARGETS

Our current strategies approach towards achieving optimal sustainable operations are set as below:

Key ESG Factor	Strategies	Targets
Economic	Entrepreneurship, Innovation & Empowerment	- Empower our people to be professionals demonstrating the highest standards of ethics and integrity - Strive to maintain our competitive edge by providing our employees with the necessary competence to perform their roles effectively
Environment	Waste & Resource Management	- Engages licensed scrap collector for proper waste management system - To conduct audits to ensure compliance with ISO waste management standards
Social	Employment Practices	- Provide trainings to build and broaden employees' knowledge and skills - To send key management personnel to attend trainings - Conduct annual appraisals to reward employees based on performance - To develop a comprehensive training plan to cater for all employees to keep up with industries updates and changes - To conduct employee's empowerment through objective annual evaluations
	Student Centric	- Focus on understanding our students and putting them first in everything we do - Strive to understand what they are seeking and continuously improve the quality of our courses to meet their needs and expectations. - To use combination on internal and external measurements to assess current practice and to improve quality of our products
Governance	Corporate Governance	- Compliance with the new code of corporate governance 2018 - To endeavour compliance with all mandatory listing requirements and new code of conduct
	Corporate Values & Code of Conduct	- Complies with our whistle blowing and anti-corruption policy - To promote awareness and maintain compliance with or existing policies - To actively seek revise and update current policies

RISK AND OPPORTUNITIES

	Economic	Environmental	Social	Governance
Risk (Operational)	Unable to meet stakeholders' demand resulting to loss of future business opportunities	Non-compliance with rules, regulations and local acts will cause penalties and disruption of business operations	Lack of knowledge and confidence to meet job expectations	Legal implications, lost of trust from valued stakeholders, suspension/termination of business/operating licenses
	Poor service quality resulting in high student turnover	Improper waste management will cause soil, water and air pollution	High level of dissatisfaction among employees and high employee turnover	High student turnover and closing of learning institution or subsidiary companies
Opportunities (Service or Experience)	Foster long term relationship with stakeholders and business associates	Increase environmental awareness in preserving nature	Increase awareness and keep employees updated on every company's way forward	Achieving long term success and promising financial returns for valued stakeholders
	Recognition in brand trust through strong quality education provider	Carry out safe, eco-friendly waste disposal practices and encourage people to do the same	Improve employees' knowledge and confidence level by sending them to attend trainings and seminars	Policies and procedures framework enhancement through continuous assessment
Approaches	Strive to achieve high customer satisfaction with periodical review on customer feedbacks	Continuously strive to comply with all required environmental rules and regulations	Conduct regular safety training and periodic emergency drills in creating health and safe working environment	Strive to comply with the new code through enhancing current policies and procedures guidelines
	Strive to maintain compliance with quality assurance and audits	Actively promoting and implementing recycling activities	Enhance employee's knowledge through ongoing learning	Maintain an updated compliance and legal requirements and make information available for stakeholders and employees

GOVERNANCE

GOVERNANCE AS THE FOUNDATION FOR GOOD

At RafflesEducation, corporate governance goes beyond regulations and compliance. We viewed it as a foundation for sustained competitive advantage that strengthens our business as well as management of sustainability related risks.

Our corporate governance framework consists of policies and control systems which provides us with guiding principles on business conduct and

ethics to all our board members and stakeholders.

Our corporate governance structure and practices are set out in our Annual Report on page 41 – 58. Strong corporate governance underscores ~~is~~ our commitment to integrity, reliability and transparency in the management of our company.

ETHICS, TRANSPARENCY AND GOVERNANCE

We firmly believe that better business performance and our success are earned through transparency, honesty and keeping our promises. Therefore, RafflesEducation holds employees and business partners to high governance, ethical and compliance standards. A strong culture of integrity drives better business results and is essential to our success.

ANTI-BRIBERY AND ANTI-CORRUPTION

At RafflesEducation, we do not tolerate bribery or corruption in our operations or on our behalf and is committed to maintaining an effective compliance programme to manage bribery and corruption risks.

The Group's anti-bribery and anti-corruption policy sets forth the constitutions of misconducts and emphasized on the prohibition of dishonest act.

We have formulated a whistle blowing policy and adopts an open-door policy to provide and avenue to all employees and members of the public to disclose any improper acts.

A dedicated whistleblowing communication channel to the CEO using email is made available to anyone who wants to report any bribery or corruption issues on a confidential basis.

GOVERNANCE

PERSONAL DATA PROTECTION

The Group recognizes that personal data collection and analysis have become widespread with the rapid developments in technology.

As part of our control measures, a Personal Data Protection (“PDP”) policy is set forth to protect the integrity of the stakeholders’ personal data from inappropriate or unauthorised use.

With our extensive range of policies and procedures, the Group seeks to enhance its’ corporate framework with continual risk assessment and management of internal controls to perform and operate in the advancing business development.

RISK MANAGEMENT

Risk Management is an integral part of RafflesEducation’s business activities both at strategic and operational levels. Through proactive risk management which supports the achievement of the Group’s business objectives and execution of corporate strategy in core markets, value is created and preserved.

The Group Risk Management Committee sets a corporate-wide approach to non-compliance procedures to investigate and follow up on any non-compliance identified as well as reporting the number of substantiated claims or incidents of noncompliance.

CYBERSECURITY AND DATA GOVERNANCE

We manage cybersecurity challenges through a stringent series of codes, policies and security controls. Customer data is protected from intrusions and unauthorised access. Employees are subjected to the strictest standards of privacy and confidentiality.

We take this challenge seriously and have established a company-wide governance infrastructure to take a holistic approach to data privacy and security. We have also registered with ACRA a Data Protection Officer where a channel of communication is made available to the public.

ENVIRONMENT

WASTE AND RESOURCE MANAGEMENT

In today's era of increasing sustainable development efforts, stakeholders are becoming more socially and environmentally conscious. At RafflesEducation, we recognize the corporate responsibility to increase the standards of living while preserving the profitability of the organization.

In our journey towards greener surrounding, we endeavor to make use of environmentally friendly materials and promotes conservation of non-renewable resources and reduce our environmental impacts.

We integrate our environmental efforts into our business operations. Our environmental initiatives aid in gaining competitive advantage

against other market players and in building trust with our valued stakeholders.

The Group conducts proper disposal of material waste in all subsidiaries through the engagement of licensed scrap contractors in our bid to build a sustainable environment.

Furthermore, we intend to incorporate this sustainable development culture into the building plans and construction methods of all our future international schools and institutions of learning.

We are in the process of obtaining certification for ISO 14001:2015 and strive to maintain compliance with the applicable environment rules and regulations standards.

SOCIAL

HUMAN CAPITAL

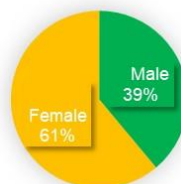
Our business is extremely people-centric, and therefore the ability to attract, develop, motivate, and retain talent is critical to our sustainability. At a time of profound and rapid technology change, the Group's HR strategy is focused on providing our global, diverse workforce with a stimulating environment that is flexible, nurtures social contract, fosters innovation, builds a result-oriented, high-performance culture, and motivates today's multi-generational and mobile workforce to develop itself personally and professionally.

Our employee-friendly workplace and HR policies have resulted in consistently a strong employer brand.

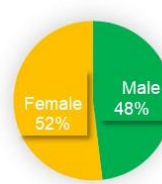
We have a highly educated workforce whose skills are greatly valued globally. The total number of employees as on 30 June 2019 was 1,541. Our workforce is predominantly young, with an average age of 30 years.

Gender	No. of Permanent Employees	No. of Temporary Employees
● Male	467	164
● Female	733	177
Total	1,200	341

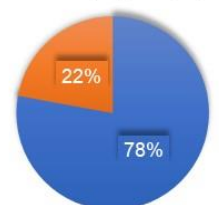
Permanent Employees (%)



Temporary Employees (%)



Total Employees (%)



■ Permanent Employees
■ Temporary Employees

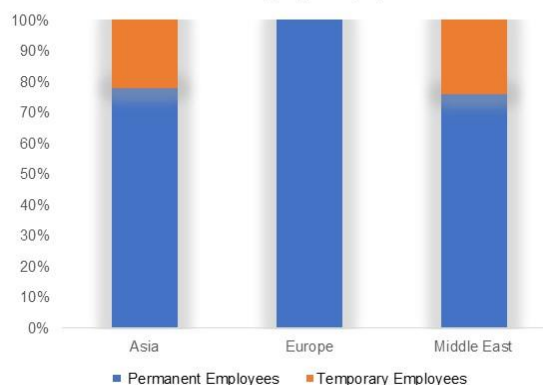
DIVERSITY AND EQUAL OPPORTUNITY

At RafflesEducation, every employee is valued and respected, irrespective of gender, ethnic or religious background, age, culture, social background or other personal characteristics. These principles are laid down in the Group's mandatory minimum employment standards, which apply globally and across all of its locations. In the reporting period, RafflesEducation was not notified of any discriminatory behavior. Should violations become known, these would be sanctioned according to the legal instruments available locally.

The international nature of the Group is evident not only in the workforce but also on the management level. Wherever possible, local management positions are held by local executives. Furthermore, the Group seeks to fill an increasing number of Group management positions with international candidates. It also encourages international collaboration through RafflesEducation expat programme, which supports employees in gaining experience in another country where the Group is represented.

Region	Permanent Employees	Temporary Employees
Asia	1172	335
Europe	9	0
Middle East	19	6

Total Employees (%)



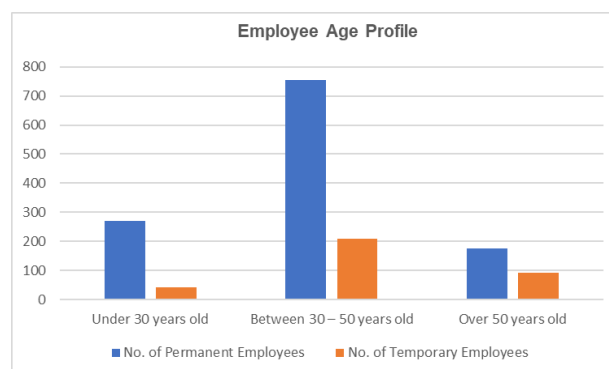
SOCIAL

FAIR EMPLOYMENT PRACTICES

Fair employment practices create an inclusive workplace culture. While both development tools can be utilized independently and accordingly, the two tools are connected. Continuing education trainings compliment performance evaluations by establishing an active communication channel between employer and employees. Employee gatherings strengthen bonds and builds a strong working relationship between employees for an efficient workplace synergy.

The Group conducts annual performance appraisals for all employees to validate their merit performance to complete job tasks. Objective evaluations aid in the recognition of employees' competency and gaps, potentially allowing adjustments to the training program.

Age Group	No. of Permanent Employees	No. of Temporary Employees
Under 30 years old	271	41
Between 30 – 50 years old	755	209
Over 50 years old	174	91



STAFF ENGAGEMENT

RafflesEducation encourages open communication and positive employee bonding to create a happy work environment that boasts productivity.

At RafflesEducation, we practise an open-door policy where we allow all employees to obtain fair review and a prompt response to problems or concerns relating to any aspect of work. This includes harassment, handling of grievances and whistleblowing policies that are applicable

to all employees. Most of our schools and colleges publish an e-magazine to provide weekly and monthly updates on the latest developments within each school and colleges.

Information such as employment terms, benefits and practices, ethics and code of business conduct is made available to the employees through the Company's intranet portal.

POSITIVE WORK ENVIRONMENT

RafflesEducation recognizes that a positive work environment is essential to attract, motivate and retain talents. A total well-being programme has been put in place to promote personal development, health and work life harmony. Initiatives include a comprehensive medical benefits plan, flexible work arrangement,

employee engagement initiatives, etc.

Under the leadership of the Group's Chairman and CEO, Mr. Chew Hua Seng, the Group will continue to build on its strong foundation and strive to continue to be a premier education provider.

SOCIAL

TRAINING AND STAFF DEVELOPMENT

We have allocated time into training and upskilling our employees to meet strategic targets in a changing work environment. More skilled employees enhance the company's human capital and contribute to employee satisfaction, which strongly correlates with performance improvement.

Job related training	Topics related	Participants
Orientation	- Company mission, vision, and values - Corporate culture - Organizational structure and leadership team intro - Mandatory new-hire paperwork - Overview of benefit plans - Administrative procedures (ID, password and email setups, attendance record, etc.) - Key corporate policies	Compulsory for all new hiring
On-boarding training and service training	A series of department-specific sessions that take place over a longer period of time (on-going)	Applicable to all employees
Technical skills and development training	A series of department-specific sessions that take place over a longer period of time (on-going)	Applicable to all employees
Soft skills development training	- Communication skills - Presentation skills - Leadership skills - Teamwork	10 10 12 10

ZERO TOLERANCE ON HARRASSMENT

We have zero tolerance for direct or indirect discrimination, victimisation, intimidation, bullying or harassment in the workplace.

Any non-compliance incidents can be reported to Group HR and can be subjected to disciplinary action. Our standards for labour standards are communicated to all employees. Our talent policies and initiatives are aimed at strengthening our team as well as creating an equitable, and safe workplace where our team can thrive and work together for high-impact urban transformations.

RafflesEducation is committed to and strongly

supports a policy that allows employees to work in an environment free from any unwelcomed harassment or abuse by fellow employees or others.

We view sexual harassment as a serious misconduct that undermines the integrity and respect of the working relationship of employees in the workplace. Sexual harassment is also regarded as a serious violation of the Company's Rules and Code of Conduct and the Company will not hesitate to report such violations or misconduct to the police.

SOCIAL

COMMITMENT TOWARDS A SAFE AND HEALTHY WORKPLACE

Occupational health and safety ("OHS") are of utmost importance to RafflesEducation.

We are committed to having a safe and healthy learning environment and workplace for all and are in the midst of drawing up a framework towards OHS that will include identifying material issues, setting of policies, and ensuring accountability within the Company.

STUDENT CENTRIC

When our students expect quality education and good experiences, we at RafflesEducation focus on understanding our students and putting them first in everything we do.

We strive to understand what they are seeking and continuously improve the quality of our courses to meet their needs and expectations. We use a combination on internal and external measurements to assess how we are doing and to improve the quality of our product services.

We have conducted our Student Satisfaction Surveys in 2018 and 2019 for services rendered that cover the area of facilities and environment, teaching- learning resources, student support services, student grievances, general satisfaction and overall satisfaction rates.

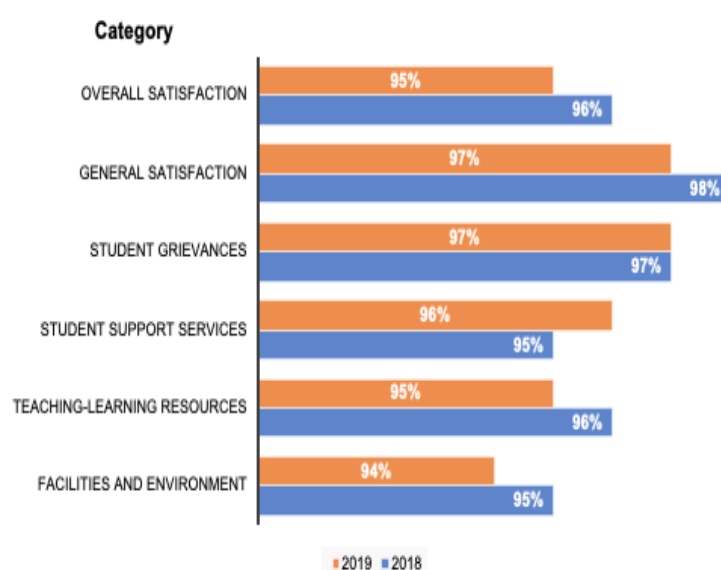
The benchmark for each area is 75% out of a total score percentage.

Key Results based on surveys conducted

RafflesEducation has achieved its target set and has improved the scores in all categories as we strive to deliver high quality of customer services and experience to all our students.

The top 3 feedbacks based on the highest satisfaction scores provided were:

- 1) General Satisfaction
- 2) Student Grievances
- 3) Teaching – Learning Resources



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102-9	Supply chain	Nil
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102-23	Chair of the highest governance body	7
102-24	Nominating and selecting the highest governance body	7
102-25	Conflicts of interest	N.A.
102-26	Role of highest governance body in setting purpose, values, and strategy	7
102-27	Collective knowledge of highest governance body	7
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102-30	Effectiveness of risk management processes	13
102-31	Review of economic, environmental, and social topics	9 - 18
102-32	Highest governance body's role in sustainability reporting	7
102-33	Communicating critical concerns	9 - 19
102-34	Nature and total number of critical concerns	Nil
102-35	Remuneration policies	Not included in this report
102-36	Process for determining remuneration	Not included in this report
102-37	Stakeholders' involvement in remuneration	Nil
102-38	Annual total compensation ratio	Not included in this report
102-39	Percentage increase in annual total compensation ratio	Not included in this report

Topic Specific Standard Disclosure		Page Reference
Stakeholder Engagement		
102-40	List of stakeholder groups	8
102-41	Collective bargaining agreements	Nil
102-42	Identifying and selecting stakeholders	8
102-43	Approach to stakeholder engagement	8
102-44	Key topics and concerns raised	8
Reporting Practice		
102-45	Entities included in the consolidated financial statements	Not included in this report
102-46	Defining report content and topic Boundaries	5
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102-48	Restatements of information	N.A.
102-49	Changes in reporting	N.A.
102-50	Reporting period	5
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Topic: Economic Performance		
201-1	Direct economic value generated and distributed	N.A.
201-2	Financial implications and other risks and opportunities due to climate change	N.A.
201-3	Defined benefit plan obligations and other retirement plans	N.A.
201-4	Financial assistance received from government	N.A.
Topic: Market Presence		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	N.A.
202-2	Proportion of senior management hired from the local community	N.A.
Topic: Indirect Economic Impacts		
203-1	Infrastructure investments and services supported	N.A.
203-2	Significant indirect economic impacts	N.A.
Topic: Procurement Practices		
204-1	Proportion of spending on local suppliers	N.A.
Topic: Anti-corruption		
205-1	Operations assessed for risks related to corruption	9 – 12
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205-3	Confirmed incidents of corruption and actions taken	Nil

Topic Specific Standard Disclosure		Page Reference
Topic: Anti-competitive Behavior		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	N.A.
Category: Environmental		
Topic: Materials		
301-1	Materials used by weight or volume	Nil
301-2	Recycled input materials used	Nil
301-3	Reclaimed products and their packaging materials	Nil
Topic: Energy		
302-1	Energy consumption within the organization	Nil
302-2	Energy consumption outside of the organization	Nil
302-3	Energy intensity	Nil
302-4	Reduction of energy consumption	Nil
302-5	Reductions in energy requirements of products and services	Nil
Topic: Water		
303-1	Water withdrawal by source	Nil
303-2	Water sources significantly affected by withdrawal of water	Nil
303-3	Water recycled and reused	Nil
Topic: Biodiversity		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Nil
304-2	Significant impacts of activities, products, and services on biodiversity	Nil
304-3	Habitats protected or restored	Nil
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	Nil
Topic: Emissions		
305-1	Direct (Scope 1) GHG emissions	Nil
305-2	Energy indirect (Scope 2) GHG emissions	Nil
305-3	Other indirect (Scope 3) GHG emissions	Nil
305-4	GHG emissions intensity	Nil
305-5	Reduction of GHG emissions	Nil
305-6	Emissions of ozone-depleting substances (ODS)	Nil
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Nil
Topic: Effluents and Waste		
306-1	Water discharge by quality and destination	Nil
306-2	Waste by type and disposal method	10 - 11, 14
306-3	Significant spills	Nil
306-4	Transport of hazardous waste	Nil
306-5	Water bodies affected by water discharges and/or runoff	Nil
Topic: Environmental Compliance		
307-1	Non-compliance with environmental laws and regulations	Nil
Topic: Supplier Environmental Assessment		
308-1	New suppliers that were screened using environmental criteria	N.A.
308-2	Negative environmental impacts in the supply chain and actions taken	Nil

Topic Specific Standard Disclosure		Page Reference
Category: Social		
Aspect: Employment		
401-1	New employee hires and employee turnover	15 - 18
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	N.A.
401-3	Parental leave	Not included in this report
Topic: Labor/Management Relations		
402-1	Minimum notice periods regarding operational changes	Not included in this report
Topic: Occupational Health and Safety		
403-1	Workers representation in formal joint management-worker health and safety committees	18
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Nil
403-3	Workers with high incidence or high risk of diseases related to their occupation	Nil
404-4	Health and safety topics covered in formal agreements with trade unions	Nil
Topic: Training and Education		
404-1	Average hours of training per year per employee	Not included in this report
404-2	Programs for upgrading employee skills and transition assistance programs	17
404-3	Percentage of employees receiving regular performance and career development reviews	Not included in this report
Topic: Diversity and Equal Opportunity		
405-1	Diversity of governance bodies and employees	15 - 16
405-2	Ratio of basic salary and remuneration of women to men	Not included in this report
Topic: Non-discrimination		
406-1	Incidents of discrimination and corrective actions taken	Nil
Topic: 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	N.A.
Topic: Child Labor		
408-1	Operations and suppliers at significant risk for incidents of child labor	N.A.
Topic: Indirect Economic Impacts		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	N.A.
Topic: Security Practices		
410-1	Security personnel trained in human rights policies or procedures	N.A.
Topic: Rights of Indigenous Peoples		
411-1	Incidents of violations involving rights of indigenous peoples	N.A.
Topic: Human Rights Assessment		
412-1	Operations that have been subject to human rights reviews or impact assessments	N.A.
412-2	Employee training on human rights policies or procedures	N.A.
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	N.A.
Topic: Local Communities		
413-1	Operations with local community engagement, impact assessments, and development programs	8
413-2	Operations with significant actual and potential negative impacts on local communities	N.A.

Topic Specific Standard Disclosure		Page Reference
Topic: Supplier Social Assessment		
414-1	New suppliers that were screened using social criteria	N.A.
414-2	Negative social impacts in the supply chain and actions taken	N.A.
Topic: Public Policy		
415-1	Political contributions	N.A.
Topic: Customer Health and Safety		
416-1	Assessment of the health and safety impacts of product and service categories	N.A.
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	N.A.
Aspect: Marketing and Labeling		
417-1	Requirements for product and service information and labeling	N.A.
417-2	Incidents of non-compliance concerning product and service information and labeling	N.A.
417-3	Incidents of non-compliance concerning marketing communications	N.A.
Aspect: Customer Privacy		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Nil
Aspect: Socioeconomic Compliance		
419-1	Non-compliance with laws and regulations in the social and economic area	Nil



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