

SUSTAINABILITY REPORT 2020

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About This Report

Rich Capital Holdings Limited (hereafter referred to as "**Rich Capital**", the "**Company**" and collectively with its subsidiaries, the "**Group**") presents its annual Sustainability Report (the "**Report**") which covers the Group's sustainability practices from 1 April 2019 to 31 March 2020 (the "**Reporting Period**").

The Report provides information about Rich Capital's key sustainability topics, its management approach and its performance across the Group's operations. The Group has chosen the Global Reporting Initiative ("**GRI**") Standards as it is a more established international sustainability reporting standard for reporting on a range of environmental, social and governance impacts. This Report is prepared with reference to the GRI Standards - "Core" option and incorporates the primary components of the report content as set out under Listing Rule 711B of the Singapore Exchange Securities Trading Limited (the "**SGX-ST**") Listing Manual Section B: Rules of Catalist ("**Catalist Rules**") and Practice Note 7A Sustainability Reporting Guide which provides the "Comply or Explain" requirements on sustainability reporting under Catalist Rule 711B.

The Group's material topics are identified based on their impact on our internal and external stakeholders, as outlined in the Key Stakeholder Engagement section. Detailed section reference with GRI standards is found at GRI Standard Content Index Page. The Sustainability Task Force of the Group, that provides oversight of sustainability issues has assessed that external assurance is not required as the Group has limited operations in the Reporting Period. The Group will continue to strengthen the reporting framework in the next few years as the Group diversifies into property development, property investment and management, and provision of specialist construction services business.

As part of our continued efforts to improve our reporting, stakeholders are welcome to send enquiries regarding the Report to us at <u>general@richcapital.com.sg</u>

Chairman Statement

The Group will continue to adopt sustainability practices relevant for the property development and investment business, *inter alia*, the assessment of joint venture partners and contractors for environmental, social and governance compliance as well as engaging the local communities in which the Group's projects are based in.

Governance and Statement of the Board

Rich Capital is committed to contributing its fair share of shaping a sustainable society. We have established a Sustainability Task Force comprising senior management currently headed by the Group Deputy General Manager for Projects and Operations who provides oversight over the Group's sustainability objectives and progress so as to align with our strategic direction. As part of the Group's strategic formulation, the Board has considered the sustainability issues as part of its strategic formulation, determined the material Environmental, Social and Governance factors ("Material ESG Factors") and overseen the management and monitoring of the Material ESG Factors.

The Group has also adopted a precautionary approach in its strategic decision-making and day-to-day operations by ensuring material risks are identified and mitigated to an acceptable level. The

Sustainability Task Force will continue to monitor, review and assess the environmental, social and governance factors relevant to the Group from time to time in future and at least on an annual basis to create long-term value for our stakeholders. However, under the "New Normal" amidst the COVID-19 environment, the Task Force will step up its assessment on a half-yearly basis, or as and when there are new regulatory guidelines from the relevant authorities.

Identification of Material ESG Factors and Key Stakeholder Engagement

The Group's approach to sustainability starts from the identification of key stakeholders and relevant factors relevant to the Group's business. The Group regularly engages and communicates with all our stakeholders and updates on the Group's developments to understand their needs and incorporate these into our corporate strategies to achieve mutually beneficial relationships.

The feedback we receive from our stakeholders helps us to determine our material topics, areas of concern and relevant factors as set out below:

Stakeholders	Areas of Concern	Means of Engagement	Section Reference
Employees	 Ethics and conduct Work environment and condition Fair employment policies Occupational health and safety 	 Performance Appraisal Sustainability reporting Internal policies on safety and health Fair employment practices 	 Diversity and Equal Opportunities Labour Practice and Work Environment Workplace Safety and Health Ethics and Compliance Anti-corruption and whistleblowing Interested person transactions
Shareholders and investors	 Economic performance Anti-corruption Sound corporate governance 	 SGX-ST announcements Annual reports Investor relations management Whistle blowing channels Sustainability reporting 	 Ethics and compliance Anti-corruption and whistleblowing Interested person transactions Regulatory compliance Working with reputable partners Shareholders' Meetings Diversity and Equal Opportunities
Government and regulatory bodies	 Regulatory, legal and industrial requirements 	 Comply with both relevant laws, regulations, policies and procedures, where applicable Maintain sound risk management 	 Ethics and compliance Anti-corruption and whistleblowing Labour Practice and Work Environment Interested person transactions Regulatory compliance

			 Working with reputable partners Shareholders' Meetings
Communities	 Impact to environment from operations 	Sustainability reporting	 Energy and water consumption Workplace safety and health Sustainable supply chain management

The relevant factors are prioritised based on the interests and requirements of key stakeholders and their relevance to the Group's business, strategy and business model to identify material factors that are then validated internally.

Material Topics and Boundaries

The Group has referenced the GRI Principles for Defining Report Content to identify material topics which are relevant to its business and to its stakeholders. The Group will report material topics as and when these topics become relevant as a result of the diversification.

The following table summarises the material Environment, Social and Governance ("**ESG**") topics that are determined to be the most significant to the Group during the Reporting Period. As there are no significant changes in activities of the Company since the financial year ended 31 March 2019 ("**FY2019**"), the material topics remains the same as per FY2019.

Material Topics	Boundaries (where the impacts apply)
ENVIRONMENT	
GRI 302: Energy and Water	The Group
SOCIAL	
GRI 405: Diversity and Equal Opportunity	The Group
GRI 406: Non-Discrimination	The Group
GRI 419: Socioeconomic Compliance	The Group
GOVERNANCE	
GRI 205: Anti-Corruption	The Group

Organisation Profile



Company Name: Rich Capital Holdings Limited Founded: 1998 **Company Headquarters: Singapore**

Listed on SGX: 2003

Rich Capital was listed on the SGX SESDAQ (Stock Exchange of Singapore Dealing and Automated Quotation system) in 2003 under its former name, Infinio Group Limited and subsequently transited to Catalist with effect from 2007. Over the years since its listing in the SGX-ST, the Company had evolved

from technology, content and solutions business, mineral resource industry to property development and property investment. The Company adopted its current name and a new corporate identity since 2 May 2018.

Apart from property development and property investment, the Company's business scope also includes providing specialist construction services as well as the acquisition and sale of properties with yield-accretive and/or capital-growth potential. The Group also holds the mining and prospecting licences of the Birthday Gold Mine in Bulfinch area in Western Australia.

Our Business Property Development

a. Local Projects



Artiste Impression

6 Kim Chuan Terrace – located in Tai Seng B2 industrial precinct, this proposed 7-storey freehold strata industrial building, with modern façade and operational specifications suitable for a myriad of production needs, comes with passenger and service lifts designed for twenty and forty persons respectively, and with one lorry and six passenger parking lots.

This project is currently under review of its feasibility and sustainability due to the uncertainty and current economic environment amidst the COVID-19 pandemic. Please refer to the Company's announcement dated 29 July 2020 in respect of the breach of loan covenant by the whollyowned subsidiary of the Company which holds the 6 Kim Chuan Terrace.



Artiste Impression

333 Thomson Road (formerly known as Peak Court) – Proposed 5-storey (ninety units) freehold condominium, low density design and lush landscape with carparks, swimming pool and communal facilities nestled within the heart of Novena Health precinct in District 11. The Group holds a fifteen per cent (15%) stake in the above property project.

At the time of this report, the Peak Court project has since been disposed by the Group on 2 June 2020 and the Group no longer holds any interest in the project. Please refer to the Company's announcement dated 2 June 2020.

b. Overseas Project



Oxley Convention City ("OCC") – On an approximately 20,000 square meter land parcel, it is the first 5-in-1 integrated premier development situated within the heart of Batam's central business district, Indonesia.

OCC comprises (i) three 32-storey Residential Blocks, holding in total 1,635 apartments with selection of Studio, 1-Bedroom, 2-Bedroom, 3-Bedroom and Penthouses; (ii) an 18-storey Condotel Tower with 360 keys; and (iii) a 27storey Office Tower with 320 strata office units; a 2-storey podium with 130 modern retail shops and one convention centre spanning over a 2,833 square meter floor plate with two collapsible halls with multi-storey car parking.

The Group currently holds a forty per cent (40%) stake in the project. In view of the current legal disputes, the Company is now working closely with the JV partners and lawyers to come up with an amicable resolution to resolve the issues.

Units in *Phase 1 that were sold pre-acquisition in 2016, were expected to completed by Oct 2020. Post-acquisition units sold after 2018, are expected to complete by July 2022. As at the date of this report, the Group is of the view that these expected completion dates will not be achievable in view of the current legal disputes with the JV partners in Batam. Further announcement(s) will be made on this matter when there are material development(s).

* Phase 1 comprises 1,193 apartments, 360 condotel and 100 retail shops.

Material ESG Factors and Targets Environment

At Rich Capital, we are committed to be a responsible partner in the communities that we operate in. In order to achieve this, we ensure that our processes are safe, efficient and environmentally friendly. Our overarching commitment towards sustainability includes:

- Compliance with regulatory requirements and guidelines
- Energy and water efficiency
- Environmentally friendly waste management
- Accessible and safe design for end-users
- Ease of and safety for maintenance
- Efficient structural system that boost construction productivity
- Selection of sustainable materials whenever plausible
- Engagement and communication with surrounding communities

Energy and Water Consumption

Rich Capital is dedicated to maintaining and upholding energy saving standards in its water and electricity consumption. In our property development business, we review measures and adopt innovative technologies that could help us with improving environmental matters relevant to the property. This includes sustainability certification, energy efficiency and water conservation, promoting responsible sourcing practices along the supply chain and encouraging the use of eco-friendly and recycled materials.

The Group had in FY2019 introduced the following practices:

At all our project sites, where energy and water consumption can be very excessive, we will encourage and ensure that our appointed contractors adhere to the following practices: -

- i) Using recycled water in recycle tanks or sumps at washing bays, harvesting non-portable water for heavy washing,
- ii) Selected products that meet PUB's Water Saving Standards or WELS for our projects,
- iii) Insist on energy saving products, motion sensors light switches and using Low-E or Low-Emissivity glass for our facades, and adopting Photovoltaic Solar panels were plausible.

The Group targets to implement these practices across all of our project sites in the financial year ending 31 March 2021 ("FY2021") as the Group's operations at its project sites in FY2020 were minimal.

Workplace Safety and Health

The Group has requirements in place to enforce Workplace, Safety and Health Act (WSHA), not only within the organisation, but also to our surrounding community and neighbours. We conducted periodic checks and audits for WSHA compliance, prepared Risk Assessments before any high-risk works were carried out, insisted on Project Quality Plans (PQP), etc. All our projects are also required by the WSH, Design for Safety (DfS) to identify and address foreseeable safety risks throughout the lifecycle of the projects. Even though these are statutory requirements only in Singapore, we will adopt these practices in our Batam

project when the Batam Project resumes operations. Contractors are required to ensure that we protect the environment and surroundings for our Batam project which is situated at Batam city area. We ensured that the contractors that we engage have proper access to the worksite, full safety hoarding surrounding the site, deploying security guards, constructing washing bay and even Earth Control Measures (ECM) to ensure mud and earth do not spill out of the site together with the trucks and trailers. We also created a Public Hotline for feedbacks and issues that public may raise during construction.

We intend for these practices to continue in the future at all work sites and that we will also making the necessary adjustments and improvements to suit any changes of conditions at the workplace. So far, there had been no reported cases of safety lapses and/or accidents in our project sites in FY2020. The Company also targets to achieve zero fatality, major accidents or incidents and to impose heavy fines for infringement of its internal safety policies in FY2021.

Sustainable Supply Chain Management

Rich Capital takes great care in selecting the right mix of supply chain in order to be aligned with the Group's sustainability strategy. In doing so, Rich Capital seeks to ensure that its contractors, consultants and suppliers can produce the quality of works and fulfil the commitments to the environment, health and safety standards that the Group desires. Our vendors, suppliers and short-listed contractors are selected and pre-qualified based on several factors including face-to-face meetings, track records, customer feedback, project references, and financial stability. In selecting contractors, where it is necessary, we also pay visit to project sites to appraise the short-listed contractors' quality of works delivered and checking on their safety records and satisfy ourselves that they have a similar belief for the well-being of the environment, safety and quality. It should be noted that the Group did not carry out these activities in FY 2020 because of the reasons set out in the Property Development project above. The Group will continue to conduct 100% checking and verification on our selection of major vendors, suppliers and contractors when all of our projects resume activity.

Social Topics

Diversity and Equal Opportunities

The Group embraces diversity and offers employees a fair and inclusive environment. We do not discriminate our employees in any aspect, including gender, race, religion or age. Employees are recruited based on their ethics, attitude, qualification and work experience. The Group will continue to abide by the local labour laws in the countries that we operate in and to promote fair employment practices. All employees are treated with respect and there was no reported incident of discrimination from our employees or the relevant authorities in FY2020 and the Group targets to maintain this performance in FY2021.

Labour Practices and Work Environment

We believe that our employees are our key assets. We are committed to actively engaging our workforce, motivating them to work together with the Company. Spreading positivity and appreciation in the workplace to encourage and helps nurture happy, satisfied employees, spurring their desire to contribute positively to the Company. To complement our commitment to work-health safety, we strive to build a workplace culture that promotes work-life balance and a healthy well-being.

During the Reporting Period, the Group engages staff on weekly meetings whenever it is convenient for the purpose of giving them updates, offering opportunities for their feedback, encouraging them to contribute to new ideas, 2-ways interaction between management and subordinates, improvements on work practices, and providing on-the-spot trainings to help them perform better and more efficiently. We also organise small lunches or simple informal staff gatherings and bonding events. In our worksite at the Batam Project, we constantly remind workers that their safety and well-being come first. We give out small rewards for good attitude, good safety practices, helpfulness, and displays of leadership qualities to the staff to encourage them.

Notwithstanding the above, the Group notes that there was high employee turnover in FY2020. The newly-appointed management of the Company endeavours to review and improve the selection and hiring processes, understanding any staff issues during appraisals, to better understand and bridge the gaps in expectations between the employer and employees. Encouraging employees to come forward with any work or work environment related issues based on dialogue is expected to help to adjust or assist, if necessary, to create a more inclusive and corporative working environment. With this, the Company hopes to reduce the Group's employee turnover in FY2021

Governance

Ethics and Compliance

Rich Capital is committed to conducting its business in accordance with the highest standards of business ethics and integrity. We work diligently to ensure that our employees understand and comply with applicable laws, regulations and professional codes of conduct, by informing and updating the employees during regular staff meetings and appraisals.

Anti-Corruption and Whistleblowing

The Group takes a strong and uncompromising stance against corruption and bribery, and does not tolerate any form of malpractice, impropriety, statutory non-compliance or wrongdoing by staff in the course of their work. To achieve the highest standards of integrity and accountability, the Audit Committee (the "**AC**") has incorporated a whistleblowing policy into the Company's internal control procedures so as to provide a channel for staff to report in good faith and in confidence, without fear of adverse consequences and reprisals, concerns about suspected fraud, corruption, bribery, dishonest practices or other similar improper conduct matters. The objective of the policy is to ensure an independent investigation of such matters and appropriate follow-up action. During FY2020, the Company had complied with the whistleblowing policy, where the appropriate follow-up actions in respect of whistleblowing reports received in FY2020 had been adhered to. The Group targets to continue to ensure full compliance with its whistleblowing policy in FY2021 and to continuously improve the policy, where gaps and areas of weaknesses have been identified.

Interested Person Transactions

The Company has set out procedures to ensure that all transactions with interested persons are reported on a timely manner to the AC and that the transactions are conducted at arm's-length basis, on normal commercial terms and will not be prejudicial to the interests of the Company and its minority shareholders.

The Company's compliance with the IPT General Mandate's conditions and procedures in respect of the Batam project Award in 2018 is still being reviewed by the Independent Reviewer as at the date of this report. Further updates on this matter will be provided through further announcement(s) where appropriate. The Group did not have an IPT general mandate in FY2020 and it also did not enter into any IPT of more than S\$100,000 in value.

Working with Reputable Partners

There was no active search for new investments or property development, due to the legal disputes and the current financial standings. Nonetheless, the Group will continue its policy of working with reputable partners with its diversification into property development and property investment. The Group will continue engaging in meaningful partnerships with established local and overseas players in the property sector, and to reassess all major partners on their environmental and social impacts using topics from the GRI Standards with all our future projects or investments. Working with the reputable partners will enhance a project's marketability and branding, which translates into higher levels of sales, value per sq. ft and better profitability. The assessment includes an assessment of their reputation in the industry, sustainability practices, disclosure on their compliance with relevant international and local laws, whether they have taken mitigating actions to address impacts (if any) and whether there have been fines, pending legal disputes, on-going litigations, sanctions or penalties against them for the past three (3) years. The Group targets to maintain these assessment criteria for selecting and working with reputable partners in FY2021.

Regulatory Compliance

We encourage open communication and comply with the Group's policies and procedures. The Company is currently in the midst of an independent review to determine if there are any internal control lapses and breaches in the relevant laws and regulations, amongst others. The Company will provide updates in this regard through further announcements once the independent review has been concluded The Group adheres to the relevant labour standards and complies with local laws. In FY2020, there were no fines or non-monetary sanction as a result of non-compliance with laws and regulations in the social and environmental area except as explained below.

During the year, the Board was informed in early Feb 2020 by its Indonesian partner, PT KIB that the Company, through OBPL has breached its obligations under the Shareholders Agreement and the Joint Operations Agreement through gross mismanagement of the sales of the Project by selling units in the Project, without complying with an Indonesian law which provides that Sale and Purchase Agreements ("SPAs") with buyers can only be entered into once building construction progress has reached 20%. The illegal signing of the SPAs has been ongoing since the inception of the Project in 2016, even before the Company acquisition of OBPL. While the Company is fully committed to comply with the law, the Company has requested OKIB to engage independent lawyer to review the matter and investigate the facts as well as how to conduct the refund and what are OKIB's legal obligations and responsibilities. The

Company is also currently consulting its own legal advice on this matter. The Company will provide updates in this regard through further announcements when there are material development(s).

Moving forward, the Group's continual commitment towards sustainability will focus on these ESG factors for FY2021 within the office until our projects resume operations:

- Compliance with regulatory requirements and guidelines; and
- Engagement and communication with surrounding communities

Shareholders' Meetings

Rich Capital believes in encouraging shareholders' participation at its general meetings. It delivers the notices of general meetings and related information ahead of the meetings based on the requisite notice period, giving shareholders sufficient time to plan their schedule, to review the notices of meeting and the proposed resolutions and to appoint and give instructions to proxies to attend on their behalf if they wish. The notices of the meetings are also advertised in The Business Times, Singapore and through Company's announcements on the SGXNet.

External auditors were also on standby at the annual general meetings so they could help address shareholders' queries, if any, relating to the conduct of the audit and the preparation and content of the auditor's reports.

Our response to the COVID-19 pandemic

Since the start of 2020, the 2019 Novel Coronavirus ("COVID-19") pandemic took hold of the world, pushing countries into varying degrees of quarantines and lockdowns globally. Economies and social activities came to a standstill, with most industries taking hard hits operationally and financially. Singapore's economy has not been spared and is expected to undergo a challenging period. COVID-19 has cast a thick cloud of uncertainty, and market sentiments will likely remain cautious. The Company has also looked at the following aspects amidst the COVID-19 pandemic.

Social Aspects

During the Circuit Breaker, the Company has responded to the government's call to institute safe distancing measures, embrace 'Work from Home' (WFH) arrangements and telecommuting as long as possible and necessary. Where WFH is impossible, the Company has implementing Safe Entry registry and safe distancing within the office, providing face masks and hand sanitisers to the employees. The Company will continue to do so until it is safe and based on the Government's guidelines and regulations.

The economic downturn brought on by the crisis has also threatened livelihoods, and job security which is also a key concern for many employees. However, the company will maintain the employment of its existing employees as long as the Company is viable to keep the business going.

As at the date of this report, there has been no material disruptions or constraints to our operations due to the outbreak of the pandemic, as there are currently no activities on our project sites, or have we breached any of the COVID-19 restrictions that may lead to penalties by the relevant authorities. Nevertheless, our office remains operational and undisrupted due to the safe distancing measures, as we are still able to operate efficiently from home, where possible.

Business Aspects

COVID-19 pandemic has changed the business landscape and consumer behaviour in an irreversible manner. Given the current economic uncertainty and the lack of investible quality property assets locally, we continue to monitor the market closely for good buying opportunities in a depressed market post COVID-19. The Company will conduct a fundamental review of its business and its business strategy against the operating environment considering all macro-environment factors. It requires the Company to look into the future and consider various scenarios that may play out when we emerge from the pandemic. The company will also be looking into the possibility of diversifying into businesses outside of the property industry that are less capital intensive, potentially higher margin and generating stronger free cash flow. We strongly believe that the coming fiscal year will be a year of change and we continue to position ourselves to seize any opportunity in the near term by staying lean and with the ability to respond quickly to market changes in this ever-changing business landscape.

Financial Aspects

The Group has completed proposed disposal of 50% of the entire issued share capital of RCR on 2 June 2020 to meet ongoing operational and funding requirements. This includes the review of our current property portfolio to align with our business strategy and searching for new opportunities in real estate development and investments.

With the current dispute with the Indonesian joint venture partner and lawsuits in the Batam Project, all site work has stopped, hence construction expenditures have also stopped. There is currently no material financial impact arising from COVID-19 to the Group. In addition, the Group has not commenced development of Kim Chuan Project.

Environmental Aspects

With the impact of COVID-19 on global change were every organisation and individual can play a part. we target to reduce staff carbon footprint from telecommuting and working from home, where possible. We have adopted an active and holistic approach in addressing the threat of climate change through mitigation and adapting energy efficient products in all our projects, focusing on reducing our energy consumption in our worksite, as well as our workplace. With work-from-home arrangements in place, we could contribute to a reduction in greenhouse gas emissions and our carbon footprint. The daily commute is a big contributor to greenhouse gas emissions which are harmful for the environment. Staff commute daily to work releasing toxic pollutants into the atmosphere leading to poorer air and health problems.

SGX Five Primary Components Index

S/N	Primary Component	Section Reference	
1	Material Topics	 Key Stakeholder Engagement Material Topics and Boundaries Property Development Governance Social Topics 	
2	Policies, Practices and Performance	 Chairman Statement Property Development Governance Social Topics 	
3	Board Statement	Governance and Statement of the Board	
4	Targets	Sustainability Targets	
5	Framework	About This Report	

GRI Standards Content Index

GRI Standards	Disclosure Content	Report Section Reference
102-1	Name of the organisation	Organisation Profile
102-2	Activities, brands, products, and services	Organisation Profile
102-3	Location of headquarters	Organisation Profile
102-4	Location of operations	Organisation Profile
102-5	Ownership and legal form	Organisation Profile
102-6	Markets served	Organisation Profile
102-7	Scale of the organisation	Organisation Profile
102-8	Information on employees and other workers	Social Topics
102-9	Supply chain	Organisation Profile
102-10	Significant changes to the organisation and its supply chain	Chairman Statement
102-11	Precautionary principle or approach	Governance and Statement of the Board
102-12	External initiatives	N.A.
102-13	Membership of associations	Organisation Profile
102-14	Statement from senior decision-maker	Chairman Statement
102-15	Key impacts, risks, and opportunities	Chairman Statement
102-16	Values, principles, standards, and norms of behaviour	Social Topics
102-17	Mechanisms for advice and concerns about ethics	Social Topics
102-18	Governance structure	Governance and Statement of the Board
102-40	List of stakeholder groups	Key Stakeholder Engagement
102-42	Identifying and selecting stakeholders	Key Stakeholder Engagement
102-43	Approach to stakeholder engagement	Key Stakeholder Engagement
102-44	Key topics and concerns raised	Key Stakeholder Engagement
102-46	Defining report content and topic boundaries	About This Report, Material Topics and Boundaries
102-47	List of material topics	Material Topics and Boundaries
102-48	Restatements of information	N.A.
102-49	Changes in reporting	N.A.
102-50	Reporting period	About This Report

GRI Standards	Disclosure Content	Report Section Reference
102-51	Date of most recent report	N.A.
102-52	Reporting cycle	About This Report
102-53	Contact point for questions regarding the report	About This Report
102-54	Claims of reporting in accordance with the GRI Standards	About This Report
102-55	GRI content index	GRI Standards Content Index
102-56	External assurance	About This Report
302-1	Energy consumption within the organisation	Property Development, Environment
302-3	Energy intensity	Property Development, Environment
302-4	Reduction of energy consumption	Property Development, Environment
302-5	Reductions in energy requirements of products and services	Property Development, Environment
303-1	Water withdrawal by source	Property Development, Environment
303-3	Water recycled and reused	Property Development, Environment
205-1	Operations assessed for risks related to corruption	Social Topics
205-2	Communication and training about anti-corruption policies and procedures	Social Topics
205-3	Confirmed incidents of corruption and actions taken	Social Topics
405-1	Diversity of governance bodies and employees	Diversity and Equal Opportunities
406-1	Incidents of discrimination and corrective actions taken	Diversity and Equal Opportunities
419-1	Non-compliance with laws and regulations in the social and economic area	Regulatory