



**SUSTAINABILITY REPORT**  
**FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2018**

Co. Reg. No. 201531866K

## **SUSTAINABILITY REPORT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2018**

### **About this Sustainability Report**

We are pleased to present the annual Sustainability Report of Secura Group Limited (the “Company” or “Secura Group”, and together with our subsidiaries, the “Group”), for our financial year ended 31 December 2018 (“FY2018”).

This report was prepared in compliance with Rule 711B of the Singapore Exchange Securities Trading Limited (“SGX-ST”) Listing Manual Section B: Rules of Catalyst, and is guided by the Global Reporting Initiative (“GRI”) Standards: Core Option. We have adopted the GRI reporting framework as it offers an internationally recognised benchmark for disclosure across a comprehensive range of sustainability related topics.

The scope of the policies and data covered in this report pertains to operations in Singapore only, where we are headquartered in, unless indicated otherwise.

In defining our reporting content, we have applied GRI’s principles defining report content by considering the Group’s activities, impact and substantive expectations and interests of our stakeholders. We observed a total of four principles, including stakeholder inclusiveness, sustainability context, materiality and completeness. For reporting quality, we observed principles of balance, comparability, accuracy, timeliness, clarity and reliability.

We applied a standardized approach to data collection and analysis across all our operations, and ensure data is monitored and verified for accuracy internally before circulation. We have not sought external assurance for this report. The environmental, social and governance data and information provided for the purpose of this report have not been verified by an independent third party.

In our continuous efforts to ensure and improve our sustainability journey, we welcome your views and feedback at [info@securagroup.com.sg](mailto:info@securagroup.com.sg)

*This sustainability report has been prepared by Secura Group Limited (the “**Company**”) and has been reviewed by the Company’s sponsor, United Overseas Bank Limited (the “**Sponsor**”), for compliance with Rules 226(2)(b) and 753(2) of the Singapore Exchange Securities Trading Limited SGX-ST (the “**SGX-ST**”) Listing Manual Section B: Rules of Catalyst.*

*This sustainability report has not been examined or approved by the SGX-ST. The SGX-ST assumes no responsibility for the contents of this sustainability report, including the correctness of any of the statements or opinions made or reports contained in this sustainability report.*

*The contact person for the Sponsor is Mr. Chia Beng Kwan, Senior Director, Equity Capital Markets, who can be contacted at 80 Raffles Place, #03-03 UOB Plaza 1, Singapore 048624, telephone: +65 6533 9898.*

### Board Statement on Sustainability

The Board of Directors (“Board”) and management (“Management”) of Secura Group subscribe to sustainability efforts and take a long-term view in all areas of environmental, social and governance (“ESG”) practices in our continuous pursuit to create economic value for all our stakeholders.

This sustainability report identifies the key material ESG factors of importance to the Group, spells out our strategies to manage the challenges and defines objectives and indicators for improvement.

Our Board and Management believe in the integration of technology applications into our business operations in the execution and provision of security services to all our customers. This will strengthen our pursuit of long-term sustainable growth for the Group, especially when we concurrently provide our staff with training, cross-job opportunities and skills upgrading.

Our sustainability efforts are led by the CFO and the Head of each business unit. The Board, having determined the material ESG factors of the Group, oversees the management and monitoring of these factors and takes sustainability issues into consideration in the determination of the Group’s strategic direction and policies.

We published our first Sustainability Report last year and have included comparative data in this year’s report.

The Company will continue to refine our sustainability efforts and work towards developing sustainability in line with business objectives.

### Organisational Profile

Secura Group was listed on the Catalist Board of the SGX-ST on 28 January 2016 through a merger of the Secura group of companies and the Soverus group of companies.

The two groups came together to offer an integrated suite of security products, services and solutions. The main business segments are in security guarding, security printing, cyber security, homeland security and digital forensic and security systems integration, security consultancy and security training.

Secura Group also holds 20% interest in Custodio Technologies Pte Ltd, a subsidiary of Israel Aerospace Industries Ltd. The main business of Custodio Technologies is in research and development of new security solutions and capabilities with a focus on cyber early warning technology.

The Group is headquartered at 38 Alexandra Terrace, Singapore 119932 and operates from three other locations in Singapore – Pioneer Road North and Buroh Street factories for its printing operations and a unit in a flatted factory at Kallang Place for its systems integration business. Through its security printing division, it also has associates operating in Taipei, Taiwan and Dhaka, Bangladesh.

As at the end of FY2018, Secura Group has 16 subsidiaries, joint ventures and associates, comprising 12 local entities employing a total of 947 (FY2017: 808) staff in Singapore. The substantial increase in staff force is in relation to employment of relief officers to support the security guarding business.

The Group has a diversified customer base comprising more than 900 customers in various industries, including multinational corporations, financial institutions, government agencies and small and medium size enterprises.

The Group also represents itself in the industry's associations, with 3 of its subsidiaries holding membership in the Security Association Singapore and the Association of Certified Security Agencies. The Group's Managing Director (Security Guarding) is also the Vice President (Systems) of the Security Association Singapore. The Group and some of its subsidiaries also subscribe to membership in the Association of Small and Medium Enterprises and Singapore Chinese Chamber of Commerce and Industry.

For the printing division where there are manufacturing activities, we ensure raw materials supplies, in particular paper materials are from internationally approved sustainable sources. The sources of paper materials are either FSC (Forest Stewardship Council) or PEFC (Programme for the Endorsement of Forest Certification) certified.

#### Precautionary Principle

Given the Group's current scale of operations, we have not undertaken any measures to address potential environment impacts. We do observe recycling procedures and ensure the appropriate disposal of industrial waste according to approved guidelines from the National Environmental Agency.

#### Our Mission and Core Values

The Company is committed to be the most trustworthy and reliable security service provider. Our focus on quality and customer service takes first priority in our business management to provide customer satisfaction and long term sustainability.

Hosting a broad spectrum of integrated security solutions and services, our mission is to empower people with the right expertise and technologies to make the world a safe place.

- Committed To Serve  
= to be accountable for the task at hand and demonstrate dedication to excellence
- Integrity First  
= to communicate honestly and directly, making decisions that are fair and ethical
- Respect For All  
= ensuring any personnel is respected regardless of diverse backgrounds and experiences
- Positive Discipline  
= to inculcate good behaviors within guided rules of the various industry practices
- Progressive Mindset  
= to keep an open mind that is always curious and seeking continuous learning

For our employees, we are committed to enabling personal growth through frequent training, cross-job opportunities and skills upgrading.

For our clients, we are committed to excellence in services to safeguard their assets effectively, enabling them to achieve economic success.

For the general public, this means that they will always be in safe hands regardless of work, live or play.

### Corporate Social Responsibility

The Group is committed to corporate social responsibility and subscribes to building strong and sustainable businesses that mutually benefit all stakeholders, in particular the well-being of our employees and our community at large. We involve our management and staff in giving to the needy residents in our neighbourhood on a quarterly basis.

As one of the largest integrated security service providers employing more than 900 employees, we champion the welfare of our employees and encourage the active participation of our employees through volunteering and supporting worthy causes. Some staff are involved with food distribution to residents on approved welfare assisted schemes while others volunteer with providing home cooked meals for low income residents.

#### *Commitment to our Bursary Programme*

Since 2012, we have been awarding bursaries to the children of our employees, in particular our security officers on a bi-annual basis. To date, we have given out bursaries amounting to over \$148,000 benefiting students from primary to tertiary levels. In 2018, we gave out bursaries to children of 106 security officers.

#### *Supporting our Staff*

We provide insurance coverage and extend various telecommunications, medical and dental benefits to all our staff. We also encourage our security officers to become members of National Trade Union Congress (NTUC) and provide for their subscription fees. This will provide the extended insurance coverage in the event of any mishap.

#### *Contributing to the NTUC U Care Fund*

We support the mission of NTUC Caring Labour Movement and contribute in annual donations to help improve the lives of low income members and their families; support needy children and youth in their pursuit of excellence; and provide assistance to the elderly in a meaningful way.

#### *Festive Cheer for the Elderly*

We continue to engage with the Operation Redshirt, formed by a group of friends, on their annual distribution of goodie bags and 'ang paws' for the less privileged elderly during the Chinese New Year season. We contributed St Luke's prickly heat powder and towels and provided mini buses to transport the volunteers to various distribution points.

We also reached out to 30 households which are mainly needy senior residents at the Radin Mas neighbourhood during the Christmas festive season together with the Radin Mas committee. It was a meaningful day extending the Christmas joy to the needy and we will continue to promote such kind gestures.

### *Shoe Donation Drive*

We collaborated with Soles4Souls Singapore, a non-profit organisation which collect and distribute shoes to the less fortunate across the continent. Our staff donated a total of 102 pairs of shoes.

### *Sponsorship of Top Student Prizes for University of Glasgow*

As endorsement of our support for distinction, we sponsored cash prizes for Top Project Prize and Top Student Awards for the 2018 graduating students on joint program from University of Glasgow and Republic Polytechnic.

### *Subscription to Work Learn Technical Diploma (WLTD) programme*

The Company sponsors students from Institute of Technical Education and provide formal apprenticeship-based training arrangement to support on-the-job training and allow students to deepen their skill sets. In the longer term, we expect to achieve the training of interns in the required disciplines and provide the industry with its pool of local employees.

### *Our Approach to Sustainability*

At Secura Group, we believe that good governance is the key to sustainable business. Our mission is to be the leading security solutions provider in the region and our focus is to deliver customer satisfaction within the framework for managing economic, environmental, social and governance issues.

Managing environmental and social issues is an integral part of our business model. Providing services that meet the requirements of clients and regulatory bodies requires stringent adherence to environmental and safety standards. Attention to social issues such as labor management relations, employee engagement, talent retention and development helps to ensure excellent delivery of our security services and solutions. We value relationships with our clients and stakeholders, and the solid ties forged help to meet new challenges. We believe that in the long term, these efforts will be reflected in our economic performance.

Our Management has been instrumental in leading Secura Group in our sustainability journey. They work closely with the heads of business units including finance, human resources, procurement and quality, who together make up the working team managing sustainability on a day to day basis.



## **OUR STAKEHOLDERS**

We identify stakeholders as groups that have an impact, or have the potential to be impacted by our business. As part of the materiality assessment process, Secura Group has identified five (5) key stakeholder groups to engage with, based on their level of influence and interest.

<b>Stakeholders</b>	<b>How we engage</b>	<b>Key topics raised</b>
Investors	<ul style="list-style-type: none"><li>▪ Annual meetings</li></ul>	<ul style="list-style-type: none"><li>▪ Corporate governance</li><li>▪ Financial performance</li><li>▪ Business outlook</li></ul>
Employees	<ul style="list-style-type: none"><li>▪ Induction and training program</li><li>▪ Annual performance review</li><li>▪ Annual townhall meetings</li><li>▪ Quarterly employee gatherings</li><li>▪ Annual workplace health checkup activities</li></ul>	<ul style="list-style-type: none"><li>▪ Staff welfare</li><li>▪ Training and development needs</li><li>▪ Good working environment</li><li>▪ Work-life balance</li><li>▪ Career advancement</li></ul>
Customers	<ul style="list-style-type: none"><li>▪ Monthly customer satisfaction survey following completion of services</li><li>▪ Weekly/ monthly/quarterly customer meetings</li></ul>	<ul style="list-style-type: none"><li>▪ Quality service and security measures</li><li>▪ Price of products and services</li><li>▪ Future needs and requirements</li></ul>
Business partners	<ul style="list-style-type: none"><li>▪ Non-disclosure agreements</li><li>▪ Annual business meetings</li><li>▪ Conferences</li></ul>	<ul style="list-style-type: none"><li>▪ Meeting of sales targets</li><li>▪ Review on financial performance and business outlook</li><li>▪ Supply chain quality</li></ul>
Associations and Unions	<ul style="list-style-type: none"><li>▪ Regular meetings</li><li>▪ Collective agreements with Union of Security Employees (USE) and Singapore Industrial and Services Employees' Union (SISEU)</li></ul>	<ul style="list-style-type: none"><li>▪ Update on industry and business trends</li><li>▪ Review of industry skill sets</li></ul>

In our engagement with the various stakeholder groups, we obtain their feedback and where appropriate, integrate these into our work plan and actions.

### Material Economic, Environmental, Social and Governance Factors

Our Sustainability Committee comprises our CFO, Managing Director (Security Guarding), Managing Director (Security Technologies), Administration Manager of Security Printing, Financial Controller and Group Human Resource Manager. We reviewed our business strategy and model based on inputs from various stakeholders and had identified the following material ESG factors. In arriving at material ESG factors, the Sustainability Committee was guided by GRI standards and had focused on issues that are of significance to the Group's economic, environmental and social impacts, and had substantive influence on the assessments and decisions of stakeholders. We have also assessed the boundary of the various material ESG factors, i.e. where the impacts of these factors occur, to be the entities within our Group.

#### A) Economic Performance

The Group places priority on the interests of our shareholders and key stakeholders. We believe in providing timely and comprehensive information on our financial performance and seek to keep our shareholders and key stakeholders updated on the Group's strategic direction and business operations. We are committed to maximising shareholders' value and will continue to drive operational and financial improvements.

FY2018 was a year of consolidation for the Group as we undertook major steps to improve our business structure and reposition ourselves for new market trends and developments. We channeled resources towards strengthening our competencies in our core business segments. With the consolidation, we were able to focus our resources on maximizing opportunities in growth areas and achieve overall cost efficiencies to improve our financial performance.

We continue to expand our adoption of technology and innovation, adding to the existing infrastructure. We will share our vision with current and potential customers on the integrating of electronic surveillance technologies to security protection requirements. We expect to achieve cost benefits and thereby yield increased value add per employee.

For more details, please refer to our Annual Report FY2018.

#### B) Governance

The Board is committed to achieving and maintaining high standards of corporate governance in order to safeguard the interests of shareholders of the Company. Please refer to the Corporate Governance Report set out in our Annual Report FY2018 for further details.

The Board and Management will continue to ensure that we uphold the highest level of conduct and ethical standards. To that end, we have established policies and practices in

line with internal controls objectives in areas such as conflicts of interests, whistle blowing and fraud, and insider trading.

a. Conflicts of Interests Policy

The Group has set guidelines for staff to identify and avoid conflicts of interests between themselves and the Company. All of our Management personnel and executive staff are required to provide annual declarations on any conflicts of interests.

b. Insider Trading Policy

The Group adopts a “Code of Best Practices on Securities Transactions by Officers of the Company”. Officers are reminded not to trade in the Company’s shares directly or indirectly during the “black-out” periods prior to the announcement of quarterly and full year financial results and/or when they come into possession of information not yet made available to the general public.

c. Fraud and Whistleblowing Policy

Secura Group is committed to high ethical standards in honesty and accountability in its conduct of business. As part of our whistleblowing policies and procedures, any employee may in confidence, raise concerns about possible improprieties and file complaints directly with the Company’s Audit Committee.

d. Data Privacy

In the course of daily operations, the entities within the Group may gain possession of personal data from customers as well as employees. The Group is mindful of the risk of data leakage and mitigates this risk with the introduction of a Personal Data Protection Act (PDPA) policy which sets guidelines and procedures on data handling, use and compliance.

Customers’ data are encrypted and stored in secured databases with protection against IT security threats. Vulnerability assessments are conducted quarterly and penetration tests are performed annually to ensure that our network and security systems remain robust and are in compliance with industrial security requirements.

As a service provider to the financial industry, our printing segment has been examined for its suitability of the design and operating effectiveness of controls to meet the control objectives set forth in the Association of Banks in Singapore’s (“ABS”) “ABS Guidelines on Control Objectives & Procedures for Outsourced Service Providers” since Year 2016. The audit review is conducted annually by Ernst & Young Advisory Pte Ltd and there have been no substantiated complaints or any breaches or loss of customer data.

As for our other business segments, we do not handle customers' data and there have not been any breaches of customer privacy. Nevertheless, we ensured that key staffs in each department undergo training in Personal Data Protection Act to reinforce the discipline of observing privacy.

Our security policies and procedures are disseminated to all employees with security awareness training conducted annually. Managers are in constant engagement with staff to ensure that the Group's PDPA policy is adhered to and practiced. As at the date of this report, the Group has not received any complaints concerning breaches of customer privacy and losses of customer data.

Secura Group will continuously update our PDPA policy in accordance with new guidelines issued by the Personal Data Protection Commission from time to time.

#### Regulatory Compliance

To the best of our knowledge, the Group has not identified any incidence of non-compliance with laws and regulations in its activities relating to social and economic areas during FY2018.

#### C) Environment

Our printing division has been operating for more than 40 years in Singapore. It is the Company's policy to establish long term relationships with credible suppliers and approved sources; in particular, our paper material supplies are from either FSC or PEFC certified paper mills.

Through our annual Quality Management System audits, we constantly monitor material waste against consumption and have a less than 1.5% tolerance for additional waste materials used. All our paper material wastes are collected by approved recycling vendors for further processing for recycled pulp.

In addition, we have taken measures to reduce energy wastage through replacement of machinery and equipment in order to reduce electricity consumption and lower the environmental impact of our business operations.

#### D) Social

Our guarding business employs more than 800 staff who are considered low-wage workers in the security sector. We support our national Tripartite Committee's effort in the adoption of the Progressive Wage Model (PWM) to increase wages of workers through skills upgrading and improved productivity. Typical of the national workers' profile for this segment, we are also champions in the employment of senior workers beyond the re-employment age of 67.

Our printing division has also supported the re-employment of workers beyond 62. As at the end of FY2018, we have 8 staff (FY2017: 6 staff) who have been employed with the Group for more than 40 years.

It is testimony of mutual sustainability of our organization and our staff – as one of our employees aptly puts it – “the Company has sustained 3 generations of my family”.

## Employment

The Group hires employees from diverse backgrounds across its spectrum of businesses. We have established policies and practices as laid down in collective agreements and our corporate handbook to ensure transparency and fairness for staff. The benefits for full-time employees including government regulated leave and workplace insurance policies are also set out in these collective agreements. As at the end of FY2018, approximately 30% of our employees are union members, similar to the previous year.

Our employee profile is largely based on our security guarding and security printing businesses. Due to the nature of these businesses, our employees are predominantly male. As at the end of FY2018, we had a total of 947 local employees comprising 768 male staff and 179 female staff in the ratio of 81:19 (FY2017: 71:29). The comparative figures are further detailed in the table below. We do not experience any significant seasonal variations in our employee profile. The Group does not outsource our business activities.

	FY2018			FY2017		
	Male	Female	Total	Male	Female	Total
Number of Permanent Employees	397	114	511	483	213	696
Number of Temporary Employees	371	65	436	87	25	112
Total Employees	768	179	947	570	238	808

In attestation of our support of the Tripartite Guidelines on the Re-employment of Older Employees, we have in our employment 99 staff or 10.5% of the work force who are above the retirement age as at the end of FY2018 (FY2017: 137 staff (17%)).

### a. Occupational Health and Safety

Our employees' health and safety at the workplace is one of our top priorities, and our goal is to have a zero accident workplace. Secura Group is committed to reducing safety and health risks through effective risk management.

Our commitment to workplace safety and health management ensures that we comply with relevant legislation (the Workplace Safety and Healthy Act) and standards. All our local entities have achieved the BizSAFE Level 3 certification awarded by the Workplace Safety and Health Council. BizSAFE is a programme tailored to assist enterprises, especially small and medium enterprises, in building up their workplace safety and health capabilities. It provides a five-level approach to help enterprises progress towards workplace safety and health management system capabilities. In order to obtain BizSAFE Level 3, the enterprise must implement a risk management plan and the enterprise must engage a workplace safety and health

auditor approved by the Ministry of Manpower to assess the implementation of risk management in the enterprise.

The Group is committed to an integrated approach to managing safety, health and well-being in the workplace. Every employee is expected to observe safety policies and practices, use the safety equipment supplied to them and practice safety at all times. We provide attire suitable for the work environment – uniforms and safety shoes, ear plugs and goggles, caps and coats for outdoor workers against weather elements. All staff undergo job-related training before being deployed on the job to ensure health and safety concerns are adequately addressed.

Due to the nature of our operations, safety training courses or programmes for our employees are also important. Employees are regularly sent for on-the-job training and safety induction courses conducted by the respective supervisors in different departments to ensure that our employees are apprised of the most up-to-date safety measures and policies so as to minimise safety breaches.

Our Safety Committee conducts meetings on a quarterly basis to raise issues on work environment and address non-compliance. The information is then disseminated to reinforce physical safety awareness and introduce/reinforce appropriate actions where necessary.

The Group provides health and term-life insurance cover for its employees. We also conduct health-screenings on premise on an annual basis to allow staff easy access to update and upkeep their health conditions.

At Secura Group, we are committed to championing a healthy lifestyle for our employees, whom we view as our most valued asset.

Against all precautionary and guided measures for workplace safety, we have had no major incidents in FY2018 as well as in FY2017.

b. Training

Secura Group believes in the continued training and development of our staff. We invest in our employees, in particular the guarding segment, to allow career progression and for our employees to “climb the wage ladder” with training and improvements in productivity.

For executive staff, the Company also identifies and sends them for related seminars, workshops and training courses.

In FY2018, our annual training hours total 11,411 hours (FY2017: 9,783 hours) for operational staff and 464 hours (FY2017: 419 hours) for executive staff. This approximates 27 hours per staff for 90% of the operational staff given the industrial requisite for continuous training and skills upgrade.

The training programs include the following modules:

- a) Handle Security Incidents & Services
- b) Operate Basic Security Equipment
- c) Recognize Terrorist Threats
- d) Perform Supervisory Duties within Legal Framework
- e) Manage Disorderly Conduct and Threatening Behavior
- f) Provide Go-The-Extra-Mile Service
- g) Manage Security Agency Within Legal Framework
- h) Threat Vulnerability Risk Assessment Course
- i) Apply employment act in HR Practices and HR Processes
- j) Apply Workplace Safety and Health in Construction Sites
- k) Basic Ionizing Radiation Safety Course
- l) Basic First Aid CPR AED Course
- m) Effective Business Writing for Managers
- n) Security Productivity Initiative (SPI) Job Redesign Workshop
- o) Quality Management Systems ISO 9001: 2015 Transition for Internal Auditors

<b>Average training hours undertaken during FY2018</b>	<b>Male</b>	<b>Female</b>	<b>Overall</b>	<b>Function</b>
Managers	34	16	23	Technical
Executives	16	16	16	Technical
Staff	27	29	27	Operational
Overall	27	26	27	

<b>Average training hours undertaken during FY2017</b>	<b>Male</b>	<b>Female</b>	<b>Overall</b>	<b>Function</b>
Managers	44	3	28	Technical
Executives	9	7	8	Technical
Staff	15	15	15	Operational
Overall	15	15	15	

In accordance with our human resource practices, all of our employees undergo annual performance appraisals. The appraisals set in place the mechanism for managers and employees to align expectations and identify performance gaps; and help develop and improve on performance. The regular engagement and feedback allows the Group to structure and continuously develop its human capital.



**GLOBAL REPORTING INITIATIVE (GRI) CONTENT INDEX**

GRI Standard	Disclosure	Page Reference/ Description
<b>GENERAL DISCLOSURE</b>		
GRI 102: General Disclosures 2016	<b>Organisational Profile</b>	
	102-1 Name of organisation	Sustainability Report (SR): 1
	102-2 Activities, brands, products, and services	SR: Organisational Profile, page 4 Annual Report FY2018 (AR): Corporate profile, page 1, Message to Shareholders, pages 2-4
	102-3 Location of headquarters	SR: Organisational Profile, page 4
	102-4 Location of operations	SR: Organisational Profile, page 4
	102-5 Ownership and legal form	SR: Organisational Profile, page 4 AR: Statistics of Shareholding, pages 129-130
	102-6 Markets served	SR: Organisational Profile, page 4
	102-7 Scale of the organisation	SR: Organisational Profile, page 4 AR: Operations & Financial Review, pages 5-7
	102-8 Information on employees and other workers	SR: Employment, page 14
	102-9 Supply chain	SR: Organisational Profile, page 5
	102-10 Significant changes to the organisation and its supply chain	AR: Message to Shareholders, pages 2-4
	102-11 Precautionary Principle or approach	SR: Precautionary Principle, page 5
	102-12 External initiatives	SR: Corporate Social Responsibility, page 6-7
	102-13 Membership of associations	SR: Organisational Profile, page 4
	<b>Strategy</b>	
	102-14 Statement from senior decision maker	SR: Board Statement on Sustainability, page 3
	<b>Ethics and Integrity</b>	
	102-16 Values, principles, standards, and norms of behaviour	SR: Our Mission and Core Values, page 5
	<b>Governance</b>	
	102-18 Governance structure	AR: Corporate Governance Report, pages 24-40 SR: Material Economic, Environmental, Social and Governance Factors, page 10
	<b>Stakeholder Engagement</b>	
	102-40 List of stakeholder groups	SR: Our Stakeholders, page 9
	102-41 Collective bargaining agreements	SR: Employment, page 14
	102-42 Identifying and selecting stakeholders	SR: Our Stakeholders, page 9
	102-43 Approach to stakeholder engagement	SR: Our Stakeholders, page 9
	102-44 Key topics and concerns raised	SR: Our Stakeholders, page 9

GRI Standard	Disclosure	Page Reference/ Description
<b>GENERAL DISCLOSURE</b>		
	<b>Reporting Practice</b>	
	102-45 Entities included in the consolidated financial statements	AR: Notes to the Financial Statements, pages 86-89 SR: About this Sustainability Report, page 2
	102-46 Defining report content and topic boundaries	SR: About this Sustainability Report, page 2 SR: Material Economic, Environmental, Social and Governance Factors, page 10
	102-47 List of material topics	SR: Material Economic, Environmental, Social and Governance Factors, pages 10-13
	102-48 Restatements of information	There were no restatements of information given in the FY2017 Sustainability Report
	102-49 Changes in reporting	There were no changes in the list of material topics and topic boundaries from the FY2017 Sustainability Report
	102-50 Reporting period	SR: About this Sustainability Report, page 2
	102-51 Date of most recent report	The Sustainability Report in respect of FY2017 was published on 9 November 2018
	102-52 Reporting cycle	SR: About this Sustainability Report, page 2
	102-53 Contact point for questions regarding the report	SR: About this Sustainability Report, page 2
	102-54 Claims of reporting in accordance with the GRI Standards	SR: About this Sustainability Report, page 2
	102-55 GRI content index	SR: GRI Content Index, pages 17-19
	102-56 External assurance	SR: About this Sustainability Report, page 2
<b>MATERIAL TOPICS</b>		
<b>Economic performance</b>		
GRI 103: Management approach 2016	103-1 Explanation of the material topic and its boundary	SR: Economic Performance, page 10
	103-2 The management approach and its components	SR: Economic Performance, page 10 AR: Message to Shareholders, pages 2-4
	103-3 Evaluation of the management approach	SR: Economic Performance, page 10 AR: Message to Shareholders, pages 2-4
GRI 201: Economic performance 2016	201-1 Direct economic value generated and distributed	SR: Economic Performance, page 10 AR: Operations & Financial Review, pages 5-7

GRI Standard	Disclosure	Page Reference/ Description
<b>MATERIAL TOPICS</b>		
<b>Occupational health and safety</b>		
GRI 103: Management approach 2016	103-1 Explanation of the material topic and its boundary	SR: Occupational Health and Safety, pages 14-15
	103-2 The management approach and its components	SR: Occupational Health and Safety, pages 14-15
	103-3 Evaluation of the management approach	SR: Occupational Health and Safety, pages 14-15
GRI 403: Occupational health and safety 2018	403-1 Occupational health and safety management system	SR: Occupational Health and Safety, pages 14-15
<b>Training</b>		
GRI 103: Management approach 2016	103-1 Explanation of the material topic and its boundary	SR: Training, pages 15-16
	103-2 The management approach and its components	SR: Training, pages 15-16
	103-3 Evaluation of the management approach	SR: Training, pages 15-16
GRI 404: Training and education 2016	404-1 Average hours of training per year per employee	SR: Training, pages 15-16
	404-2 Programs for upgrading employee skills and transition assistance programs	SR: Training, pages 15-16 Social, pages 12-13
	404-3 Percentage of employees receiving regular performance and career development reviews	SR: Training, pages 15-16
<b>Customer privacy</b>		
GRI 103: Management approach 2016	103-1 Explanation of the material topic and its boundary	SR: Data Privacy, pages 11-12
	103-2 The management approach and its components	SR: Data Privacy, pages 11-12
	103-3 Evaluation of the management approach	SR: Data Privacy, pages 11-12
GRI 418: Customer privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	SR: Data Privacy, pages 11-12
<b>Socioeconomic compliance</b>		
GRI 103: Management approach 2016	103-1 Explanation of the material topic and its boundary	SR: Governance, pages 10-12
	103-2 The management approach and its components	SR: Governance, pages 10-12
	103-3 Evaluation of the management approach	SR: Governance, pages 10-12
GRI 419: Socioeconomic compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	SR: Regulatory Compliance, page 12