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SUSTAINABILITY REPORT

17



SUSTAINABLE VALUE CREATION

BOARD STATEMENT

The Board is pleased to present Delfi Limited's inaugural Sustainability Report, which seeks to demonstrate Delfi's commitment towards sustainability for all our stakeholders. At Delfi, we firmly believe that businesses play a key role in advancing global sustainable development. We are committed to championing our corporate social responsibility and sustainability mission, through which we seek to embrace the needs of the community we work with customers, care for the environment and act in the interests of our stakeholders.

The Board considers sustainability as part of its strategy and works closely with Management in determining the material environmental, social and governance ("ESG") matters. It also plays a crucial role in overseeing the management and monitoring of the material ESG matters.

In complementing Delfi's customary and regulatory financial and corporate governance disclosures in our Annual Report, our Sustainability Report focuses on the ESG aspects of Delfi's organisational performance in accordance with the SGX Listing Rules 711A and 711B for Sustainability Reporting. Sustainability Reporting enables Delfi to strategically review our business in the context of our material sustainability impacts, alongside a phased disclosure of our performance with insights into the opportunities and challenges ahead.



ABOUT THIS REPORT

This inaugural Sustainability Report seeks to establish Delfi’s commitment towards sustainability and our stakeholders. It is a review of our business in the context of our material sustainability impacts, alongside a phased disclosure of our performance with insights into the opportunities and challenges.

REPORTING PERIOD AND SCOPE

[102-45] [102-50] [102-52] [102-54]*

Unless otherwise noted, the report consists of information reflecting our sustainability performance in the period 1st January 2017 to 31st December 2017 (“FY2017”).

The report covers our significant operations in Singapore, where Delfi is headquartered, and our key subsidiaries in Indonesia and the Philippines. Unless otherwise noted, all sustainability data and information relate to the following entities:

ENTITIES	COUNTRY	PRINCIPAL ACTIVITIES
Delfi Limited	Singapore	Marketing and distribution of products, Investment holding
Ceres (International) Marketing Pte Ltd	Singapore	Marketing of products
McKeeson Consultants Private Limited	Singapore	Management consultants
PT Perusahaan Industri Ceres	Indonesia	Manufacturing and marketing of products
PT General Food Industries	Indonesia	Marketing and distribution of products
PT Nirwana Lestari	Indonesia	Marketing and distribution of products
Delfi Foods, Inc.	Philippines	Manufacturing of products
Delfi Marketing, Inc.	Philippines	Marketing and distribution of products

* GRI General Disclosure Standards

As our sustainability reporting matures, we plan to expand our reporting scope to cover more of our operations.

REPORTING STANDARDS AND GUIDELINES

[102-51] [102-54]

This report has been prepared in accordance with the Global Reporting Initiative (“GRI”) Standards: ‘Core’ option. The GRI Standards was selected because it offers a globally relevant framework that supports a standardized approach for businesses to report on critical sustainability issues, encouraging a degree of transparency and consistency that makes information useful to markets and society. We have applied the GRI Reporting Principles for Defining Report Content and Quality in the overall preparation of this report. Reference has also been made to the principles of sustainability reporting and its primary components set out by the SGX’s Sustainability Reporting Guide.

INDEPENDENT ASSURANCE

[102-56]

Independent assurance has not been sought for this report or any of the GRI disclosures. We may consider external assurance as our reporting matures over time.

FEEDBACK

[102-3] [102-53]

We welcome feedback from all our stakeholders in shaping Delfi’s sustainability policies, practices and performance. Should you have any comments or queries, please email us at enquiry@delfilimited.com or send them to:

Delfi Limited
TripleOne Somerset
111 Somerset Road, #12-03, Singapore 238164

INTRODUCTION

ABOUT DELFI

[102-1] [102-2] [102-3] [102-4] [102-5] [102-6]
[102-7]

Delfi is one of South East Asia's leading players in branded chocolate confectionery. Headquartered in Singapore and listed on the Mainboard of the SGX-ST since 2004, our principal activities are marketing and distribution of our own brands of chocolate confectionery products in our core markets namely Indonesia, the Philippines, Singapore and Malaysia. In addition to our core markets, our products are also sold in countries across the region – including Australia, Brunei, China, India, South Korea and Vietnam.

Our business is supported by two manufacturing facilities in Indonesia and in the Philippines. Our products are distributed alongside a broad portfolio of reputable agency brands to leverage our multi-layered distribution networks deployed. Our network comprises third-party distributors, sub-distributors and wholesalers and cover a wide range of traditional and modern trade channels – from corner shops and small retailers, to supermarkets and hypermarkets.

OUR BRANDS

[102-2] [102-7]

Our main product categories are moulded chocolate, dragées, enrobed wafers, wafers and biscuits. We have a portfolio of over 10 master brands and more than 40 sub-brands that extend across a broad spectrum of categories in the chocolate confectionery market.

Our established portfolio of brands in Indonesia includes "SilverQueen", "Ceres" and "Selamat", which were introduced in the 1950's and "Delfi" in the 1980's. In the Philippines, our flagship brands are "Goya" and "KnickKnacks", which were introduced in the 1950's and the 1980's respectively. With our longstanding presence and legacy in these markets, our chocolates have delighted many generations of Indonesians and Filipinos, growing together with our brands.



INTRODUCTION

SUSTAINABILITY AT DELFI

[102-9] [102-12]

Sustainable development is “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.¹ At Delfi, we believe in doing our part in contributing towards sustainable development. At the bedrock of our organisation, our roots anchor us in the sustainability domains of economic, environmental, social and governance.

With the conviction of growing with our communities and the world, the overarching concept of sustainable value creation underpins all that we do. Akin to the cocoa tree, sustainable growth can be achieved when both our internal and external environment offers an optimal condition for us to thrive. With careful and tenacious management of our material sustainability matters, we are able to better assess our sustainability impact on our stakeholders – cultivating the positive and weeding out the negative. Our key stakeholders are the identified people and groups that can significantly affect or be significantly affected by our organisation. As we flourish, our influence and impact on our stakeholders widens as well. The challenge therein, is for us to consistently propagate the fruits of our labor through value creation, meeting their needs and expectations.

¹ United Nations World Commission on Environment and Development, Our Common Future (1987)

WE CARE AND ARE ALWAYS WITH YOU DELFI'S SUSTAINABILITY ECOSYSTEM

Influence And Impact Of Sustainability Matters



INTRODUCTION

GOALS FOR OUR STAKEHOLDERS

[102-40] [102-42] [102-43] [102-44]

At Delfi, passion for people has always been at the heart of what we do. Focusing our connections with all our stakeholders is vital for us to constantly bring delight and deliver value. Our conversations with our stakeholders allow us to understand their key concerns and respond effectively. Our sustainability approach draws upon these outcomes. We connect with our stakeholders through various modes of regular engagement including meetings, briefings, phone calls and other forms of correspondences.



Investors

We aim to promote investors' understanding of Delfi's strategy and performance through appropriate and accurate dissemination of corporate information.

In the long-term, we seek to build trust-based relationships with our investors through our emphasis on governance structures and collaborative dialogue.



Consumers

We are committed to going the extra mile to consistently provide our consumers – many of whom have been with us across generations – with a superior Delfi experience.

We emphasize continuous product development and quality enhancement in our journey to meet the needs of our broad range of consumers.



Employees & Workers

Our aspiration is to create a workplace where all our employees and workers are proud of – a true Delfi family.

Our focus is on treating our employees and workers fairly, fostering close labour union relations and advocating excellence in occupational health and safety.



Local Communities

We respect the communities we operate in, and are keen to advance the interests of the company and the community in lockstep.

As a good corporate citizen, we aim to achieve our goals through actively shaping and participating in community programs and initiatives.



Suppliers

As we view our suppliers as business partners, our objective is for mutual growth through fair and transparent dealings in compliance with relevant laws and regulations.

We are also increasingly seeking out and working with suppliers that subscribe to our sustainability agenda. We audit our original product manufacturers and key suppliers for sustainable value creation.



Customers

At Delfi, we see distributors, wholesalers and retailers as our customers as well as our partners in expanding our reach to our consumers, and ultimately driving sales for the company.

Our goal is to create a fair and mutually beneficial arrangement, through clear and open communication lines on expectations.



Governments & Regulators

We have the utmost respect for the rule of law, and continually extend our cooperation with governments and regulators.

It is our priority to ensure compliance with the relevant laws and regulations in the jurisdictions that we do business.



Trade & Industry Associates

Our goal is to play an active role in the trade and industry associations of which we are members, to help further the interests of the group.

We hope to lend our support and contribute to the various initiatives.



Non-profit Organisations

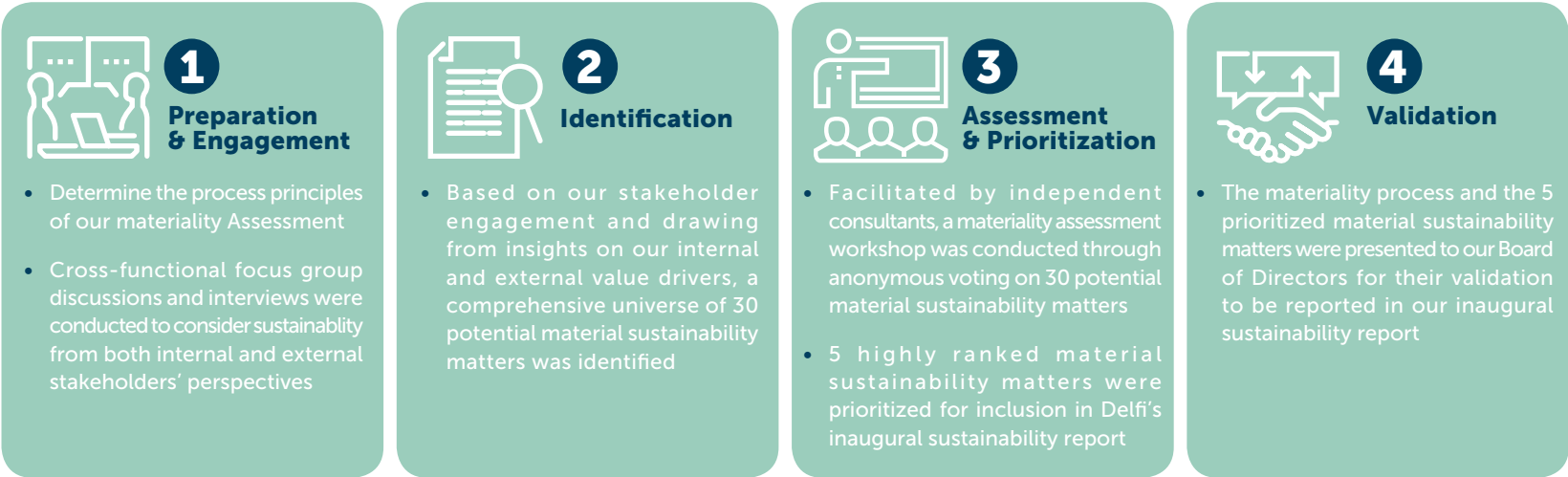
We seek to constructively engage non-profit organisations, align on common social causes and explore models for further partnership where feasible.

INTRODUCTION

MATERIALITY ASSESSMENT

[102-46] [102-47]

Delfi has formalized its way of engaging with stakeholders to identify and prioritize our material sustainability matters.



INTRODUCTION

OUR VALUE CHAIN

[102-9]

Sustainability and business goes hand in hand. We consider our responsibilities and sustainability impacts at all points along our value chain.



	INNOVATION	SOURCING	PRODUCTION
KEY STAKEHOLDER GROUPS THAT AFFECT OR ARE AFFECTED BY OUR ACTIVITIES	CONSUMERS EMPLOYEES & WORKERS GOVERNMENTS & REGULATORS INVESTORS	EMPLOYEES & WORKERS GOVERNMENTS & REGULATORS LOCAL COMMUNITIES NONPROFIT ORGANISATION SUPPLIERS TRADE & INDUSTRY ASSOCIATIONS	EMPLOYEES & WORKERS GOVERNMENTS & REGULATORS LOCAL COMMUNITIES NONPROFIT ORGANISATION TRADE & INDUSTRY ASSOCIATIONS
KEY RESPONSIBILITIES TO STAKEHOLDERS	- Compliance with all applicable laws and regulations - Safe work environment for employees and workers (non-employees) - Innovation, research and development of products - Nutrition and wellness of products	- Compliance with all applicable laws and regulations - Safe work environment for employees and workers (non-employees) - Responsible sourcing and consideration of social and environmental impacts in supply chain	- Compliance with all applicable laws and regulations - Safe work environment for employees and workers (non-employees) - Consideration of social and environmental impacts of activities - Consumer health and safety
MATERIAL SUSTAINABILITY MATTERS IDENTIFIED ALONG THE VALUE CHAIN			

LEGEND

MATERIAL
SUSTAINABILITY
MATTERS



Securing sustainable
agricultural products



Treatment & disposal
of waste & effluents



Occupational
health & safety



Compliance with import,
export & trade regulations



Consumer health & safety,
& mindful consumption

INTRODUCTION

OUR VALUE CHAIN (cont'd)

[102-9]

Sustainability and business goes hand in hand. We consider our responsibilities and sustainability impacts at all points along our value chain.



	LOGISTICS	SELLING	CONSUMER
KEY STAKEHOLDER GROUPS THAT AFFECT OR ARE AFFECTED BY OUR ACTIVITIES	CONSUMERS CUSTOMERS EMPLOYEES & WORKERS GOVERNMENTS & REGULATORS LOCAL COMMUNITIES TRADE & INDUSTRY ASSOCIATIONS	CONSUMERS CUSTOMERS EMPLOYEES & WORKERS GOVERNMENTS & REGULATORS INVESTORS LOCAL COMMUNITIES TRADE & INDUSTRY ASSOCIATIONS	CONSUMERS GOVERNMENTS & REGULATORS LOCAL COMMUNITIES
KEY RESPONSIBILITIES TO STAKEHOLDERS	- Compliance with all applicable laws and regulations - Consumer health and safety - Safe work environment for employees and workers (non-employees) - Consideration of social and environmental impacts of activities	- Compliance with all applicable laws and regulations - Consumer health and safety - Safe work environment for employees and workers (non-employees) - Consideration of social and environmental impacts of activities	- Compliance with all applicable laws and regulations - Consumer health and safety - Responsible marketing and labelling
MATERIAL SUSTAINABILITY MATTERS IDENTIFIED ALONG THE VALUE CHAIN			

LEGEND

MATERIAL
SUSTAINABILITY
MATTERS

Securing sustainable
agricultural products

Treatment & disposal
of waste & effluents

Occupational
health & safety

Compliance with import,
export & trade regulations

Consumer health & safety,
& mindful consumption

GOVERNANCE

OUR VALUES

[102-16]

Integrity, excellence and commitment are values that guide all of us at Delfi as we seek to enhance our organisation's development, performance and growth. These core values are embedded within our concept of corporate governance and form an integral part of Delfi's ethos, business, systems, processes and operations. Our mission is to delight customers and consumers with superior chocolate confectionery products and services. As an organisation, we are imbued with the following values:



Delfi's Code of Conduct provides a framework for ethical decision making and good conduct for the Group. The Code contains important core values and principles of the Company's professional conduct and governance. The Board of Directors, Management and all employees are dedicated to upholding the Code.

Grievance Mechanisms for Ethics & Integrity

[102-17]

Delfi maintains an Ethics Code, to which advice on matters of ethical concerns and grievances may be sought by our internal and external stakeholders. These matters will be handled objectively and subject to further investigation, disciplinary actions or legal process, where justified and necessary.

In addition, Delfi has a whistle blowing mechanism and policy that seeks to encourage reporting in good faith, of matters which may comprise misdemeanours, misconduct, fraud, corruption, illegal acts, etc. The mechanism and policy seeks to provide for reporting in confidence that stakeholders are treated fairly and shielded from any reprisal.

CORPORATE GOVERNANCE

[102-18] [102-23]

The Board of Delfi comprises a healthy well balanced mix of entrepreneurs, professionals and corporate expertise. Out of a total of 8 Directors, the Board comprises 3 executive Directors, 4 non-executive independent Directors and 1 non-executive non-independent Director. There is a clear separation of the role of the Chief Executive Officer and the Chairman. 1 of our 3 executive Directors serves as CEO and Managing Director. The Board meets regularly and is provided with timely updates and information. As and when there are urgent commercial or other corporate matters, Board meetings are convened to seek guidance from the Board or to elicit a decision. All Directors are expected to act in good faith, and to act in the interests of Delfi. The Board is supported by the Executive Committee, the Audit Committee, the Remuneration Committee, the Nominating Committee, the Risk Management Committee and the Market Sustainability and Strategy Committee. These committees (with the exception of the Executive Committee) provide guidance and regularly review matters within their purview.

A full report on our corporate governance practices can be found in our Corporate Governance Report in our Annual Report 2017.

GOVERNANCE

SUSTAINABILITY GOVERNANCE

[102-18] [102-32]

The Board is collectively responsible for the sustainability of Delfi. It provides strategic direction and specifically considers sustainability matters as part of its strategic formulation. On 3rd January 2017, we formed the Market Sustainability and Strategy Committee ('MSSC'). Its charter requires the MSSC to be composed of at least 3 directors or more, with a majority of whom shall be independent directors. Its mandate is as follows:



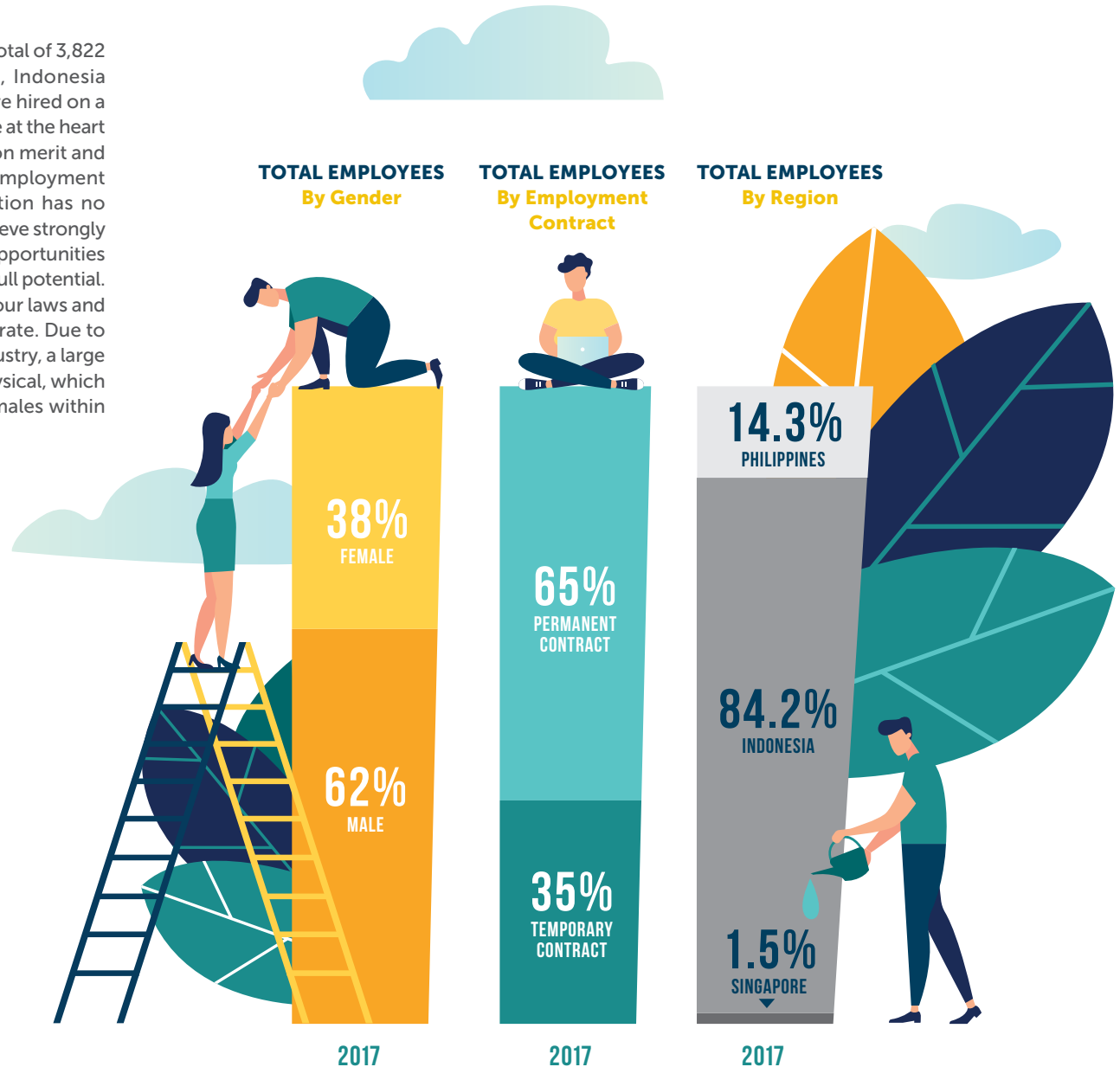
The Board works closely with Management in determining and overseeing the management and monitoring of Delfi's material sustainability matters. The Board has the ultimate responsibility for Delfi's sustainability reporting process.

OUR PEOPLE

PROFILE OF OUR WORKFORCE

[102-7] [102-8]

As at 31 December 2017, we have a total of 3,822 full-time employees in Singapore, Indonesia and the Philippines, of which 65% are hired on a permanent contract basis. People are at the heart of our organisation. We hire based on merit and are committed to upholding fair employment practices. Any form of discrimination has no place in our organisation and we believe strongly in providing our people with equal opportunities and benefits for them to reach their full potential. We are compliant to all relevant labour laws and regulations in the countries we operate. Due to the nature of the manufacturing industry, a large number of roles tend to be more physical, which explains the higher percentage of males within our workforce.





OCCUPATIONAL HEALTH & SAFETY

SIGNIFICANCE OF IMPACT

[103-1]

Human life matters greatly to us and a safety culture is deeply rooted in our organisation and everything we do. At Delfi, OHS is not only a legal and social obligation, but an essential part of our success. In building a conducive working environment, we are maximizing productivity and building a more active, motivated workforce. This minimizes business costs and unplanned disruptions, contributing to the overall profitability of our organisation. We recognize that good OHS management is critical in promoting our competitiveness as an employer and increasing our stakeholders' confidence in us. It has a direct impact on our brand value and our reputation in the market.



MANAGEMENT APPROACH

[103-2] [403-1]

POLICY

Our workforce is the heart of our operations, and their health and safety is of key concern. We meet and strive to exceed the relevant occupational health and safety standards.

In Indonesia's factory site, our employees and workers are covered by an OHSAS 18001:2007 certified OHS Management System which is internally and externally audited on an annual basis.

COMMITMENTS & TARGETS

We are committed to offering a healthy working environment and strive towards a healthy workforce. We aim for zero-loss and to continuously improve our health and safety performance across all our operations. We seek to be fully compliant with all relevant laws and regulations.

In addition, we have the following Group-level target:

Scope	Current Targets	FY17 Status
Group-level	Zero work-related fatalities, yearly	Achieved

GRIEVANCE MECHANISM

External stakeholders are able to file their feedback, concerns or grievances relating to our OHS management through our general corporate relations channels. Internal stakeholders are able to do so through human resources / union-management channels. We seek to investigate, address and resolve all confirmed cases as soon as practicable. All grievance proceedings and records will be kept in confidence.



OCCUPATIONAL HEALTH & SAFETY

PRACTICES AND PERFORMANCE

[403-2]

As an employer, Delfi is responsible in ensuring that working conditions are conducive to the health, safety and well-being of our team members. Our internal and external audits enable us to identify violations and deficient areas for improvement. We constantly encourage our people to flag out any unsafe working conditions and practices across our operations. Comprehensive training and education programmes are conducted at facilities to increase awareness and set expectations of our safety culture.

An array of specific projects and initiatives had been undertaken during the year to improve our management of OHS. For instance, we have further enhanced our Lock-out/Tag-out ("LOTO") procedures to safeguard our people from the unexpected energization or start-up of machinery and equipment and hot surfaces. We have also implemented more rigorous workplace environment monitoring for conditions such as noise, lighting lux, temperature, etc. In the Philippines, we have acquired a new noise meter to conduct stringent evaluation of the noise level for new processes and equipment. Production and processing staff who are consistently exposed to loud noises are identified as individuals who are potentially at risk of hearing impairment. These individuals are medically examined through a hearing test to establish a baseline record.

In 2017, there were zero work-related fatalities and a total of 12 reportable work-related injuries - 8 of which occurred in Indonesia and 4 in the Philippines. Main contributors include slip and fall, LOTO and work procedures. All cases were investigated and monitored closely with implementation of corrective and preventive measures, focusing on activity-based audits, enhancing the LOTO procedure and providing further Risk Assessment training. We continue to work closely with our people to reinforce our safety message and our standard operating procedures.

DELFI'S EMPLOYEES	2017
Work-related fatalities	0
Injury rate ²	0.43
Injury rate (Male)	0.54
Injury rate (Female)	0.18
Occupational disease rate ³	0
Lost day rate ⁴	0.67
Lost day rate (Male)	0.52
Lost day rate (Female)	0.93
Absentee rate ⁵	1.50
Absentee rate (Male)	1.40
Absentee rate (Female)	1.66

Footnotes for calculation methodology:

2 Injury rate is calculated as: Number of recordable cases x 200,000, to total hours worked

3 Occupational disease rate is calculated as: Number of occupational disease cases x 200,000, to total hours worked

4 Lost day rate is calculated as: Number of lost man-days x 200,000, to total hours worked

5 Absentee rate is calculated as: Number of absentee days, to total days scheduled to be worked



CASE STUDY: SAFETY MOMENTS

Since 2013, Safety Talk/ Safety Moments/ Safety Toolbox was introduced in all our operational meetings, including our daily production and maintenance meetings. At the start of these meetings, our managers and supervisors would spend at least 15 minutes sharing on safety matters, with their colleagues/subordinates. This, in addition to safety trainings that we have embarked on, has great impact with improvements and reductions of incident rates over the past few years.

In this 15 minutes moment, we will share any safety related topic of any recent incidents that occur within the Group or any incident that occurred outside of the workplace. Employees are also encouraged to share their personal experiences of safety encounters at work or offsite. The objective of these moments is to create safety awareness in the work place amongst employees and their peers. Awareness, together with safety training, will further assist in reducing and minimising injuries effectively.



CONSUMER HEALTH & SAFETY, AND MINDFUL CONSUMPTION

SIGNIFICANCE OF IMPACT

[103-1]

The food and beverage industry landscape continues to advance at a rapid pace. Fuelled by increasing stakeholder expectations, government regulations and innovation, the realities call for Delfi to sharpen its focus and awareness on consumer health and safety as a key sustainability matter as it directly impacts human lives. Consumers today are calling for greater transparency in disclosure of food safety programs and processes. A sizable group of consumers are now looking beyond the traditional concerns of food safety – the effects of food-borne contamination or immediate physical affliction. These individuals are increasingly mapping their buying decisions to potential long-term health and wellness impacts as well.

In 2017, the World Health Organization published that global obesity rates have almost tripled since four decades ago. More than 1.9 billion adults and 340 million children and adolescents were overweight or obese.⁶ As an established chocolate and confectionery company, Delfi strongly believes in having the social responsibility to promote mindful consumption of our products – especially in our young consumers. On top of encouraging the act of eating in moderation, we continually allocate resources in food science research and product innovation to design a wider range of healthier treats for the world to enjoy.



MANAGEMENT APPROACH

[103-2]

POLICY

Consumer health and safety, and mindful consumption are a priority for Delfi. We are proud of our Quality Management System that we have designed, developed, and implemented to ensure compliance with international and local food safety standards and recommendations.

Our policy on the quality of our products emphasizes the following:

- Consistency in quality
- Microbiologically safe
- No foreign materials and no contamination
- Hygienically packed and sealed

Our Quality Management System is certified in accordance with internationally recognized standards (e.g. FSSC 22000 Food Safety System Certification, BRC Global Standard for Food Safety) and are internally and externally audited on an annual basis.

COMMITMENTS & TARGETS

We are committed to deliver our brand promise of quality and safety to our consumers. We seek to be fully compliant with all relevant laws and regulations.

In addition, we have the following Group-level target:

Scope	Current Targets	FY17 Status
Group-level	Zero material incidents of non-compliance with applicable laws and regulations for consumer health and safety, and product information and labelling	Achieved

GRIEVANCE MECHANISM

Stakeholders are able to file their feedback, concerns or grievances relating to health and safety through our general corporate relations channels. Our action plan is to investigate, address and resolve all confirmed cases as soon as practicable. All grievance proceedings and records are kept in confidence.

delfilimited.com/custcare/



CONSUMER HEALTH & SAFETY, AND MINDFUL CONSUMPTION

PRACTICES AND PERFORMANCE

[416-2] [417-2]

Delfi's Quality Management System

As part of our overall Quality Management System, we have made significant investments in our quality assurance systems in order to consistently achieve high manufacturing standards. The manufacturing standards which the Group follows include:

Good Manufacturing Practice ("GMP")

GMP was established by the Food and Drug Administration in the USA in 1967 under the authority of the Federal Food, Drug and Cosmetic Act. The GMP is based on international hygiene standards, and promotes a quality approach to manufacturing. GMP guidelines provide minimum requirements that a food product manufacturer must meet to assure that the products are of high quality and do not pose any risk to the consumer or public. The regulations are relatively general and allow the Group to decide individually how to best implement the necessary controls to achieve goals such as cleanliness, equipment verification and process validation. In doing this, the Group takes into account the specific needs of its consumers.

Hazard Analysis and Critical Control Point ("HACCP")

HACCP was adopted by the Group as a comprehensive step-by-step food safety program for its production process. Assessments of hazards applicable to microbiological, chemical, physical, food safety and quality standard risks are made. Subsequent to such hazard assessment, the critical control points are determined within the production process to control identified hazards. Procedures for monitoring and taking corrective actions are established for each control point. Therefore any problem is traceable to the specific point in the production process and/or the specific raw material utilized.

The Group conducts process testing to ensure the quality and specifications of its products are consistent and meet the exacting standards of its consumers. Such in-process testing involves performing tests on samples of products to determine if there are any quality defects. In addition, the Group conducts microbiological tests on samples to ensure that its strict specifications regarding microbiological content are adhered to so that its products are always safe for human consumption.

Each delivery of products is given a unique lot identification code printed on the individual packing and accompanying documents which incorporates the date of manufacture. It can be used to trace the complete production history of the product starting from the source of raw materials. Any delivery breaching the Group's quality standards can thus be identified and stopped before it is delivered to its customers and consumers subsequently.

FSSC 22000 Food Safety System Certification

FSSC 22000 provides a framework for effectively managing the Group's food safety responsibilities. FSSC 22000 is fully recognized by the Global Food Safety Initiatives (GFSI) and is based on existing ISO Standards. It demonstrates that the Group has a robust Food Safety Management System in place. The FSSC 22000 system uses a management systems approach to food safety, using ISO 22000 for the management system requirement and ISO Technical Standards or Publicly Available Specifications (PAS) for prerequisite program requirements.





CONSUMER HEALTH & SAFETY, AND MINDFUL CONSUMPTION

PRACTICES AND PERFORMANCE (cont'd)

[416-2] [417-2]

BRC Global Standard for Food Safety

First published in 1998, the Standard is now in its eighth issue and is well-established globally. It has evolved with input from many leading global specifiers and is recognized by the GFSI. It was also the first Food Safety Standard to be benchmarked by the GFSI. It provides a framework to manage product safety, integrity, legality and quality, and the operational controls for these criteria in the food and food ingredient manufacturing, processing and packing industry.

High hygiene standards

Delfi observes high hygiene standards. Regular training and checks are conducted on our personnel at our facilities. These includes stringent requirements on attire, footwear and personal hygiene.

Innovation and technology

We draw on innovation and technology to improve our food safety standards. For example, we have made significant strides in improving our packaging materials to strengthen protection against the external environment. We have also begun a phased roll-out of new X-ray machines to enhance our foreign material detection systems across our facilities.

Labelling and communication

The display and provision of information for our products is important to our consumers as well as subject to many regulations. To that end, we strive to provide transparent access to reliable and accurate information of our products through responsible labelling. Our labels advise on the expiry, recommended storage conditions, allergen declaration, ingredients, nutritional value, etc. We continuously seek to improve the contents of our product labels with greater emphasis on the sustainability impacts of our products.

In 2017, we have met our target of zero material incidents of non-compliance with applicable laws and regulations for consumer health and safety, and product information and labelling.

THE BRC GLOBAL STANDARD FOCUSES ON:

- The importance of management commitment
- HACCP-based food safety programmes
- Quality management systems
- Auditing good manufacturing processes
- Auditing areas which often have the highest rate of product recalls and withdrawals, such as labelling and packing
- Developing systems to reduce exposure to food fraud
- Ensuring consistency of the audit process
- Promoting greater resilience, transparency and traceability in the supply chain





SECURING SUSTAINABLE AGRICULTURAL PRODUCTS

SIGNIFICANCE OF IMPACT

[103-1]

Securing socially and environmentally sustainable agricultural products is important to Delfi and its stakeholders. We recognize that our impact on people and planet extends beyond our own business activities; these impacts can occur as a result of our business relationships throughout our supply chain. Therefore, due diligence is expected of Delfi in taking concrete steps to prevent and mitigate all forms of adverse social and environmental impacts that are directly linked to our operations and products. To that end, Delfi seeks to drive the sustainability agenda along its supply chain and collaborate with like-minded business partners to mutually advance our sustainability vision.



MANAGEMENT APPROACH

[103-2]

POLICY

Our emphasis is to actively seek out and work with suppliers that support sustainable practices. Sustainability is a core criterion in our supplier evaluation, and we are continuously improving our procurement and sourcing approach to drive the sustainability agenda.

Delfi's Supplier Code of Conduct comprises our minimum requirements relating to the Environment and Social & Working Conditions, in purchasing products, materials and services. Our approach is based on international laws, regulations and the core conventions as defined in the fundamental principles of Human Rights at work, namely:-

- The Universal Declaration of Human Rights (UN, 1948)
- Convention on the Rights of the Child (UN, 1989)
- ILO Declaration (ILO, 1998)
- The Rio Declaration on Environment and Development (UN, 1992)
- The Ten Principles of the UN Global Compact Framework (UN, 2000)
- The Johannesburg UN World Summit on Sustainable Development (UN, 2002)

COMMITMENTS & TARGETS

We are committed to sustainable procurement and in promoting positive socioeconomic and environmental impact through our supply chain.

In addition, we have the following Group-level target:

Scope	Current Targets	FY17 Status
Group-level	We are currently in the midst of reviewing our supplier evaluation process. In subsequent years, we may include elements of "environmental and social responsibility" as part of the supplier evaluation matrix and review our existing suppliers based on the revised matrix.	In progress

GRIEVANCE MECHANISM

Stakeholders are able to file their feedback, concerns or grievances relating to our supply chain management through our general corporate relations channels. We seek to investigate, address and resolve all confirmed cases as soon as practicable. All grievance proceedings and records will be kept in confidence.



SECURING SUSTAINABLE AGRICULTURAL PRODUCTS

PRACTICES AND PERFORMANCE

Delfi Limited's Prescribed Standards, Requirements & Practices for the Environment, Social & Working Conditions ("Delfi Prescribed Standards").

Delfi recognizes that our business has an impact on people and the environment locally, globally and especially in the countries in which we operate and do business in. We believe that we are empowered to choose to act responsibly, with integrity and to do good while fulfilling our intent of being good business partners. Upholding this principle is a pre-condition to our future growth; a growth that will be achieved along with other like-minded responsible business partners and suppliers who share and identify with our vision, mission and approach to doing business.

In that vein, Delfi requires business partners and suppliers to acknowledge and agree to our Delfi Prescribed Standards, for the Environment, Social & Working Conditions for the management of businesses, the purchase, and/or acquisition of products, materials and/or the delivery of services. Ultimately, it is the spirit of the Delfi Prescribed Standards that is important to us, and it is with this spirit that we consistently urge our business partners and suppliers to stand shoulder to shoulder with us in upholding the Delfi Prescribed Standards.

The following table summarizes the elements covered in Delfi's Prescribed Standards.

SUMMARY OF ELEMENTS IN DELFI'S PRESCRIBED STANDARDS, REQUIREMENTS & PRACTICES FOR THE ENVIRONMENT, SOCIAL & WORKING CONDITIONS		
ENVIRONMENT • Air pollution • Noise pollution • Water and ground pollution • Energy reduction • Reduction of other environmental impacts • Storage, transportation and handling of chemicals • Storage, handling and transportation of hazardous and non-hazardous waste	SOCIAL • Health and safety • Safety hazards and fire prevention • Housing facilities and accommodation • Wages, benefits and working hours • Child labour • Forced and bonded labour • Discrimination • Freedom of association • Harassment, abuse and disciplinary action	GOVERNANCE • Legal compliance • Confidentiality • Ethics and business

Sustainability Projects and Initiatives

Delfi believes in collaborating with businesses, communities, governments and non-governmental organisations ('NGOs') to tackle systemic sustainability concerns that may be prevalent in business including some sectors, like the chocolate industry and the cocoa ingredients industry, so that it is imperative that we do our part in helping to address these concerns and working against known ills such as child labour, forced labour, human rights violations, cruelty against animals, deforestation, and pollution, while we also focus on promoting good policies and practices in employment, health, safety and governance.

In addition, our sustainability projects that we have implemented in the past, have helped some of our stakeholders increase the quality of the cocoa produced. Through these programs, we hope that we had contributed shared value through improvements to the livelihoods of farmers and their families, the cocoa communities and the environment. As our projects have either come to an end or are winding down, we are in search of and are working on identifying new opportunities.

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SECURING SUSTAINABLE AGRICULTURAL PRODUCTS

PRACTICES AND PERFORMANCE (cont'd)

CASE STUDY: PROCESSES ALLIANCE FOR COCOA TRACEABILITY AND SUSTAINABILITY (PACTS) PROGRAM



PACTS was a tri-partite joint venture (JV) with the Cemoi Group and the Blommer Chocolate Company that sought to improve the livelihoods of the local cocoa farming community in the Ivory Coast and improve the supply of high quality fermented cocoa beans. At the heart of this JV is a balance of interests of the cocoa farming community and users of cocoa beans; and at a different level, the interests of the Cote D'Ivoire and consumers of chocolate and cocoa. Formed in May 2010, the JV established up to 17 fermentation centres and worked with up to 50 local co-operatives covering approximately 10,000 farmers over the three-years. The JV developed and implemented training and instruction programs to help farmers improve efficiencies and yields of their farms and therefore, enhance their incomes.

The Good Agricultural Practices (GAP) training conducted for the farmers at model farms and at the centres provided critical blended training specifically in the area of inputs, plantation management, nurseries, grafting and post-harvest process. At the 17 PACTS centres, controlled post-harvest processes contributed to improved quality of the cocoa beans supplied to PACTS shareholders.

Over the years PACTS helped farmers to rehabilitate their farms through grafting from clonal gardens established for this purpose and working together with CNRA (Ivorian National Centre for Plant Science Research). Grafting success overall averaged 68.8%.

This initiative ended in April 2017.

CASE STUDY: THE KOKODOLA PROJECT



In Nigeria, the Kokodola Project started in 2012 and was completed in 2015. The Farmer Development Union (FADU) continued to work with the farmers on improvements to productivity and quality after the completion of the Project. The Project gave Delfi the opportunity and avenue to make sure that training of GAP, Good Environmental Practices (GEP), Good Social Practices (GSP), and Good Business Practices (GBP) was delivered to 8,917 farmers over the life of the Project. Overall performance of farmer knowledge after training yielded 78%. Enhanced knowledge in GAP was likely to assist farms in increasing productivity, yield and the quality of their cocoa beans. The farmers were also trained to maintain farming and harvest records which would help them in showing traceability of their cocoa beans crop, and this could potentially help them in getting a better price for their produce. .

Clonal nurseries helped improve yields for the farmers in this program. Quality of cocoa beans from these farms were much improved compared to farms which produced conventional or 'standard' (non clonal) cocoa beans. The overall achievement of rehabilitated, regenerated and replanted areas over the program period was good. Farmers were generally more interested to buy seeds from trusted and assured sources, and the percentage of farmers obtaining planting materials from Kokodola / FADU increased to 85% compared to 2014 when they used pods and seeds from their own farms. FADU continues to mentor and provide support to the Kokodola cocoa farmers and its communities. The program has helped improved productivity and knowledge for the farmers and the shareholders of the project has helped to create shared value through this program.



TREATMENT & DISPOSAL OF WASTE & EFFLUENTS

SIGNIFICANCE OF IMPACT [103-1]

Waste and effluents management is critical for global sustainable development. Proper sanitation, clean water and air is important for human health. As part of the food processing sector, we understand the importance in managing and reducing the waste and effluents generated throughout our operations. For our communities to prosper and enjoy a high quality of life, we have to conscientiously monitor our discharges into the environment and seek to reduce our ecological impact. It is thus vital to prioritize waste disposal methods, such as reusing, recycling and recovery that minimize residual effects. Treatment of our effluents is also crucial in ensuring that hazardous substances do not leach into ecosystems and undergo bioamplification along the food chain. Managing waste also brings about potential cost-savings to our organisation. Looking into resource efficiency in our production will enable us to create more with less and deliver greater value to our stakeholders.



MANAGEMENT APPROACH [103-2]

POLICY

We believe in investing in good environmental housekeeping practices that will minimize our environmental footprint. Our waste and effluent management policies seek to fully comply with relevant laws and regulations.

COMMITMENTS & TARGETS

We are committed to an efficient use of resources and reduction of waste and pollution. We seek to be fully compliant with all relevant laws and regulations.

In addition, we have the following facility-level targets:

Scope	Current Targets	FY17 Status
Facility-level (Indonesia)	By 2020, we seek to achieve PROPER ⁷ Green rating through improving our environment management procedures beyond the expected compliance level.	In progress. Achieved PROPER Blue rating.
	By 2019, we are exploring reduction of our non-hazardous waste as a percentage of produce.	In progress
Facility-level (Philippines)	By 2019, we are exploring reduction of our non-hazardous waste as a percentage of produce.	In progress

GRIEVANCE MECHANISM

Stakeholders are able to file their feedback, concerns or grievances relating to our waste and effluents management through our general corporate relations channels. We seek to investigate, address and resolve all confirmed cases as soon as practicable. All grievance proceedings and records will be kept in confidence.

⁷ Indonesia's Program for Pollution Control, Evaluation, and Rating (PROPER) is a national-level public environmental reporting initiative. The objective of this regulatory tool is to promote industrial compliance with pollution control regulations, facilitate and enforce the adoption of practices contributing to clean technology, and to ensure a better environmental management system. The program uses a five colour-coded performance rating – gold (excellent), green, blue, red and black (poor).



TREATMENT & DISPOSAL OF WASTE & EFFLUENTS

PRACTICES AND PERFORMANCE

Effluents

[306-1]

We closely monitor our water discharges⁸ in both our manufacturing facilities in Indonesia and the Philippines. In 2017, a total volume of 32,107 m³ of water was discharged in Indonesia and the Philippines. In Indonesia, wastewater is removed from the organisation for treatment via a third-party agency. In the Philippines, wastewater is biologically treated at the facility before discharge into the Marikina City River. We utilize wastewater quality indicators to measure and ensure that these indicators are in generally acceptable ranges⁹ before any discharge into the natural environment.

Waste

[306-2]

At Delfi, we ensure that our wastes are safely disposed of in prevention of the risk of environmental contamination. All of our wastes are managed by authorized waste contractors, which is in line with regulatory requirements. These terms, hazardous and non-hazardous waste, are terms used in accordance with GRI Standards.

⁸ In line with GRI Standards Disclosure 306-1, disclosure of water discharges in this Sustainability Report excludes discharge of collected rainwater and domestic sewage

⁹ Generally acceptable ranges of our water quality indicators includes Chemical Oxygen Demand (COD) below 100 mg/litre, Biochemical Oxygen Demand (BOD) below 50 mg/litre, Total Suspended Solids (TSS) below 70 mg/litre, pH of 6.5 to 9.0

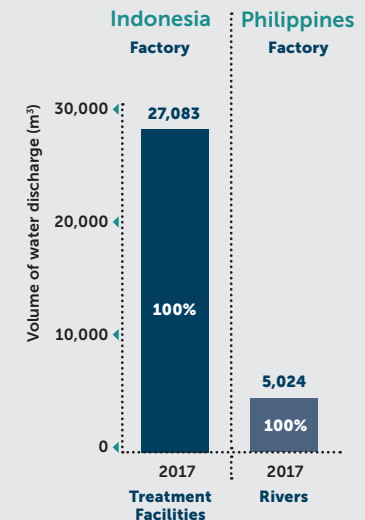
Hazardous waste typically relates to waste from our analytical laboratory (e.g. laboratory chemicals) and maintenance activities (e.g. transformer oil). Our hazardous waste amounts to 0.7% of total waste from our Indonesia manufacturing operations, and in Philippines waste amounts to 0.3%.

Our hazardous waste is managed and disposed of in compliance with local regulations by authorised waste contractors.

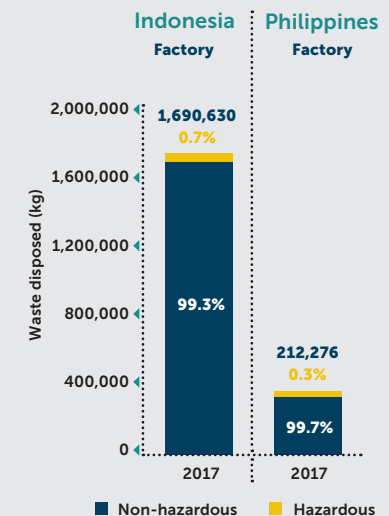
Non-hazardous waste mainly relates to typical packaging and production waste comprising paper, plastic, metallic materials and etc. Our non-hazardous waste which makes up 99.3% of our total wastes in Indonesia were accounted for through recovery, landfill disposal and recycling methods. Whilst in Philippines, non-hazardous waste which makes up 99.7% of total waste, 65% were recycled, 26% were accounted for through recovery and the remaining 9% were by landfill disposal.



Total Water Discharge



Total Waste





COMPLIANCE WITH IMPORT, EXPORT AND TRADE REGULATIONS

SIGNIFICANCE OF IMPACT

[103-1]

Delfi is a global organisation – Through our value chain, our resources, materials and products move across borders from country to country, on a daily basis. Any lapses or failures in compliance with import, export and trade regulations would directly impact our organisation and may lead to socioeconomic, civil or even criminal penalties. Non-compliance could also cause significant business disruptions such as loss of business opportunities, custom clearance and shipment delays, container abandonment or government sequestration. Such disruptions would ripple across our organisation – affecting our production and delivery schedules, greatly impacting our stakeholders across the value chain and our brand reputation. On a financial level, these costs collectively would have a significant bearing on our financial bottom line.

MANAGEMENT APPROACH

[103-2]

POLICY

To ensure smooth cross-border operations, we continuously update and refine our compliance systems and processes to ensure compliance with the relevant laws in all jurisdictions in which we do business.

COMMITMENTS & TARGETS

We are committed towards full compliance with all applicable import, export and trade regulations in all the countries that we operate in.

In addition, we have the following Group-level target:

Scope	Current Targets	FY17 Status
Group-level	Zero material incidents of non-compliance with applicable import, export and trade regulations.	Achieved

GRIEVANCE MECHANISM

Stakeholders are able to file their feedback, concerns or grievances relating to our import, export and trade activities through our general corporate relations channels. We seek to investigate, address and resolve all confirmed cases as soon as practicable. All grievance proceedings and records will be kept in confidence.





COMPLIANCE WITH IMPORT, EXPORT AND TRADE REGULATIONS

PRACTICES AND PERFORMANCE

Our cross-functional teams support one another in ensuring that our approach towards being fully compliant remains robust. We conduct regular internal meetings to update each other on any changes to the relevant laws and regulations at the local, national and international level. These laws and regulations are complex, dynamic and require close monitoring.

CATEGORIES OF LAWS AND REGULATIONS THAT IMPACT DELFI'S INTERNAL POLICIES, PROCEDURES AND PRACTICES

Free trade agreements	Transactions and tax regulations	Cargo security	Customs regulations	Import valuation and classification	Export control regulations	Trade embargoes and economic sanctions
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In 2017, there were zero material incidents of non-compliance with applicable import, export and trade regulations.



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GRI STANDARDS DISCLOSURES		REFERENCE(S) AND REASONS FOR OMISSION (IF APPLICABLE)
GENERAL DISCLOSURES		
Organisational Profile		
102-1	Name of the organisation	Board Statement (SR Pg 1); Introduction: About Delfi (SR Pg 3)
102-2	Activities, brands, products, and services	Introduction (SR Pg 3)
102-3	Location of headquarters	Introduction: About Delfi (SR Pg 3)
102-4	Location of operations	Introduction: About Delfi (SR Pg 3)
102-5	Ownership and legal form	Introduction: About Delfi (SR Pg 3)
102-6	Markets served	Introduction: About Delfi (SR Pg 3)
102-7	Scale of the organisation	Our People: Profile of our Workforce (SR Pg 11); Introduction (SR Pg 3); Five-Year Financial Highlights & Review (AR Pg 13-15)
102-8	Information on employees and other workers	Our People: Profile of our Workforce (SR Pg 11)
102-9	Supply chain	Introduction: Sustainability at Delfi (SR Pg 4); Introduction: Our Value Chain (SR Pg 7-8)
102-10	Significant changes to the organisation and its supply chain	Business Review: Developments in 2017 (AR Pg 30-33)
102-11	Precautionary principle or approach	Corporate Governance Report: Principle 11–Risk Management and Internal Controls (AR Pg 63-65)
102-12	External initiatives	Introduction: Sustainability at Delfi (SR Pg 4); Delfi participates in several other sustainability and community initiatives, which includes: - Processors Alliance for Cocoa Traceability and Sustainability (PACTS) to improve the livelihood of farming cocoa community and supply of high quality fermented cocoa beans. This initiative ended in April 2017. Delfi is also a member of the following: - Southeast Asia Alliance on Sustainable Palm Oil (SASPO) For more information, refer to: http://www.delfilimited.com/corporate_sustainability.html
102-13	Membership of associations	
Strategy		
102-14	Statement from senior decision-maker	Board Statement (SR Pg 1)
Ethics and Integrity		
102-16	Values, principles, standards, and norms of behavior	Governance: Our Values (SR Pg 9) Governance: Our Values (SR Pg 9); Corporate Governance Report: Whistle Blower Protection Mechanism & Policy (AR Pg 65)
102-17	Mechanisms for advice and concerns about ethics	

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GRI STANDARDS DISCLOSURES		REFERENCE(S) AND REASONS FOR OMISSION (IF APPLICABLE)
GENERAL DISCLOSURES		
Governance		
102-18	Governance structure	Governance: Corporate Governance (SR Pg 9); Governance: Sustainability Governance (SR Pg 10); Board of Directors (AR Pg 16-23); Corporate Governance Report: Principle 1 – The Board's Conduct of Affairs (AR Pg 49-56)
102-23	Chair of the highest governance body	Governance: Corporate Governance (SR Pg 9); Corporate Governance Report: Principle 1 – The Board's Conduct of Affairs (AR Pg 50)
102-25	Conflicts of interest	Corporate Governance Report: Principle 2 – Board Composition and Guidance (AR Pg 56-57); Principle 5 – Board Performance (AR Pg 58-60); Disclosure under SGX-ST Listing Manual Requirements – (a) Interested person transactions and conflicts of interest (AR Pg 183)
102-29	Identifying and managing economic, environmental, and social impacts	Board Statement (SR Pg 1); Corporate Governance Report: Principle 1 – The Board's Conduct of Affairs (AR Pg 54-56)
Stakeholder Engagement		
102-32	Highest governance body's role in sustainability reporting	Board Statement (SR Pg 1); Governance: Sustainability Governance (SR Pg 10)
102-40	List of stakeholder groups	Introduction: Goals for our Stakeholders (SR Pg 5)
102-41	Collective bargaining agreements	There is no collective bargaining agreements in place
102-42	Identifying and selecting stakeholders	Introduction: Goals for our Stakeholders (SR Pg 5)
102-43	Approach to stakeholder engagement	Introduction: Goals for our Stakeholders (SR Pg 5)
102-44	Key topics and concerns raised	Introduction: Goals for our Stakeholders (SR Pg 5)
Reporting Practice		
102-45	Entities included in the consolidated financial statements	About this Report: Reporting Period and Scope (SR Pg 2)
102-46	Defining report content and topic Boundaries	Introduction: Materiality Assessment (SR Pg 6)
102-47	List of material topics	Introduction: Materiality Assessment (SR Pg 6)
102-48	Restatement of information	This is Delfi's inaugural sustainability report.
102-49	Changes in reporting	This is Delfi's inaugural sustainability report.
102-50	Reporting period	About this Report: Reporting Period and Scope (SR Pg 2)
102-51	Date of most recent report	This is Delfi's inaugural sustainability report.
102-52	Reporting cycle	About this Report: Reporting Period and Scope (SR Pg 2); Delfi to perform sustainability reporting on an annual basis.
102-53	Contact point for questions regarding the report	About this Report: Feedback (SR Pg 2);

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GENERAL DISCLOSURES		
Reporting Practice		
102-54	Claims of reporting in accordance with the GRI Standards	About this Report: Reporting Period and Scope (SR Pg 2); About this Report: Reporting Standards and Guidelines (SR Pg 2);
102-55	GRI content index	GRI Content Index (SR Pg 24-27)
102-56	External assurance	About this Report: Independent Assurance (SR Pg 2)
MATERIAL TOPIC: TREATMENT AND DISPOSABLE OF WASTE AND EFFLUENTS		
Management Approach		
103-1	Explanation of the material topic and its boundary	Treatment & Disposal of Waste & Effluents (SR Pg 20)
103-2	The management approach and its components	Treatment & Disposal of Waste & Effluents (SR Pg 20)
103-3	Evaluation of the management approach	Treatment & Disposal of Waste & Effluents (SR Pg 20-21)
Effluents and Waste		
306-1	Water discharge by quality and destination	Treatment & Disposal of Waste & Effluents (SR Pg 21)
306-2	Waste by type and disposal method	Treatment & Disposal of Waste & Effluents (SR Pg 21)
MATERIAL TOPIC: SECURING SUSTAINABLE AGRICULTURAL PRODUCTS		
Management Approach		
103-1	Explanation of the material topic and its boundary	Securing Sustainable Agricultural Products (SR Pg 17)
103-2	The management approach and its components	Securing Sustainable Agricultural Products (SR Pg 17)
103-3	Evaluation of the management approach	Securing Sustainable Agricultural Products (SR Pg 17-19)
Supplier Environmental Assessment		
308-1	New suppliers that were screened using environmental criteria	Not applicable for this reporting year as we are in the midst of reviewing our supplier evaluation process. Delfi may include elements of environmental and social responsibility as part of the supplier evaluation matrix in subsequent years.
Supplier Social Assessment		
414-1	New suppliers that were screened using social criteria	Not applicable for this reporting year as we are in the midst of reviewing our supplier evaluation process. Delfi may include elements of environmental and social responsibility as part of the supplier evaluation matrix in subsequent years.
MATERIAL TOPIC: OCCUPATIONAL HEALTH AND SAFETY		
Management Approach		
103-1	Explanation of the material topic and its boundary	Occupational Health & Safety (SR Pg 12)
103-2	The management approach and its components	Occupational Health & Safety (SR Pg 12)
103-3	Evaluation of the management approach	Occupational Health & Safety (SR Pg 12-13)

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MATERIAL TOPIC: OCCUPATIONAL HEALTH AND SAFETY		
Management Approach		
403-1	Workers representation in formal joint management-worker health and safety committees	Occupational Health & Safety (SR Pg 12)
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Occupational Health & Safety (SR Pg 13)
MATERIAL TOPIC: CONSUMER HEALTH AND SAFETY, AND MINDFUL CONSUMPTION		
Management Approach		
103-1	Explanation of the material topic and its boundary	Consumer Health & Safety, and Mindful Consumption (SR Pg 14)
103-2	The management approach and its components	Consumer Health & Safety, and Mindful Consumption (SR Pg 14)
103-3	Evaluation of the management approach	Consumer Health & Safety, and Mindful Consumption (SR Pg 14-16)
Customer Health and Safety		
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Consumer Health & Safety, and Mindful Consumption (SR Pg 15-16)
Marketing and Labeling		
417-2	Incidents of non-compliance concerning product and service information and labeling	Consumer Health & Safety, and Mindful Consumption (SR Pg 15-16)
MATERIAL TOPIC: COMPLIANCE WITH IMPORT, EXPORT AND TRADE REGULATIONS		
Management Approach		
103-1	Explanation of the material topic and its boundary	Compliance with Import, Export & Trade Regulations (SR Pg 22)
103-2	The management approach and its components	Compliance with Import, Export & Trade Regulations (SR Pg 22)
103-3	Evaluation of the management approach	Compliance with Import, Export & Trade Regulations (SR Pg 22-23)
--	Incidents of non-compliance concerning import, export and trade regulations	Compliance with Import, Export & Trade Regulations (SR Pg 23)