KTL GLOBAL LIMITED

Sustainibility Report

1 January 2018 to 31 December 2018

KTL
GLOBAL

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1   MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

It gives me great pleasure to present our Sustainability Report for the calendar year ended 31 December 2018 (CY2018). In our Sustainability Report, we highlight the progress and achievements of our organisation over the previous 12 months, with particular focus on our commitment to working alongside our valued stakeholders to build a sustainable business based on our resilience, adaptability and innovation.

Conditions in the global oil and gas industry remain challenging, crude oil prices recovered and stabilised in CY2018 which resulted in a corresponding increase in activity in the global oil and gas industry. In CY2018, KTL Global Limited and its subsidiaries (the "Group") saw an increase in orders from its customers in Middle East and Indonesia. Barring unforeseen circumstances, the Group expects to continue to enjoy the benefits from such increase in business activities.

During CY2018, the Group has also undertaken fund-raising activities to raise proceeds for the expansion of the Group's business through investments, acquisition, joint ventures or strategic alliances and for general working capital purposes. Numerous changes to the Board also took place in CY2018. Mr Tan Tock Han, Mr Tan Kheng Yeow, Mr Mark Beretta and Mdm Cheong Hooi Kheng had resigned as Directors of the Company and Mr Liu Changsheng had joined the Board.

The Board considers product quality and product safety the primary material aspect in formulating the Group's business strategy. The Group will continue to work with our suppliers and customers, to build a sustainable business.

This report provides information on how we have met our responsibilities with our key stakeholders during the CY2018 and beyond.

Mr Tan Kheng Kuan
Chief Executive Officer,
Executive Director

6 May 2019

2 ABOUT THE REPORT

This is our sustainability report. The report is designed to provide a transparent and balanced view of KTL Global Limited (the "Company") and its subsidiaries (the "Group"), to reflect the interests of our key stakeholders, and to address those interests pragmatically. This report aims to include comprehensive and accessible information on the company's strategy towards sustainability, key issues as well as data according to recognized standards.

2.1 Report Scope

The report covers the performance of our consolidated entities in calendar year 2018 (CY2018) from 1 January 2018 to 31 December 2018. The content of this report will focus on the sustainability performance, activities and initiatives that are under our direct control, including our Singapore offices and operations, our local supply chain as well as any overseas activities directly associated with us. This report excludes joint ventures which are not directly under our control. Material issues and topics described in this report have been selected according to their level of significance within the company boundaries, the sustainability context and the expectations of stakeholders which are reflective of our core business in a consistent manner for comparability of our performance indicators across time. In this respect, this report covers our core businesses in our material operational boundaries in Singapore and Middle East namely KTL Offshore Pte. Ltd. and KTL Offshore Middle East FZC. Nevertheless, our corporate governance and sustainability approaches are drawn from the policies and practices set at Group level.

This sustainability report focuses on the Group's sustainability strategies and practices whilst highlighting the economic, environmental, and social and governance aspects of our activities and developments. The report aims to provide an overview of our approach, priorities and targets, as well as a performance review for our key sustainability areas.

2.2 Report Methodology

We have prepared our report based on the requirements of the 'In Accordance" - Core level of the Global Reporting Initiative's (GRI) Standards Sustainability Reporting Guidelines. We have chosen the GRI Standards reporting guidelines for its robust guidance which offers an international reference for the disclosure of governance approach and of the environmental, social and economic performance and impacts of organizations. This report also takes into consideration the primary components of the report content as set out by the Singapore Exchange's (SGX's) "Comply or Explain" requirements for sustainability reporting. Our data are reported in good faith and to the best of our knowledge. We will continue to improve our data collection processes.

We did not seek external assurance for this report.

2.3 Report Structure

This Sustainability Report is structured to reflect the interests of our key stakeholders. We have identified five key stakeholder groups, namely, the environment and future generations, employees, customers, suppliers and communities. For each stakeholder group, we lay out our management approaches that govern how our material issues are identified as well as how the issues are prioritized and managed. Further, we will present our initiatives relating to sustainability in the areas of environmental, social and economic issues relevant to our aspects and boundaries. Finally, we will provide the information of our key performance indicators, performance targets and outcomes.

The information regarding the basis for report boundaries and our materiality assessment is provided in section 4.

All together, this report provides the basis for our responses and disclosures to the GRI-Standards 'In-Accordance' - Core requirements. Relevant sections in the report are referenced in the GRI Content Index provided in section 7.

2.4   Report Contact and Feedback

We welcome and value your feedback on the content of this report and encourage you to contact us through the following channels:

❖   In writing to:
     KTL Global Limited
     7 Gul Road,
     Singapore 629364

Via our contact page at http://www.ktlgroup.com/index.php?route=contact_us

❖   This report is provided in PDF format only and is available for download on the following page of our website: http://www.ktlgroup.com/investors

3   CORPORATE PROFILE

3.1   Vision and Mission

We shall strive to maintain our position as one of the world's top suppliers to the offshore Oil & Gas and related industries, for wire and synthetic rope, rigging & heavy lift products & services.

We shall enhance this position by delivering upon the following core principles of our business philosophy:

❖   Implementation of market expansion & penetration strategies which are focused and effective.
❖   Providing wire and synthetic rope and rigging products and services on a scale that cannot easily be matched by our competitors in terms of size, quantity and availability.
❖   Delivering the highest quality products & services & the most reputable brand names in the industry.
❖   Providing a total solutions concept for the most demanding problems faced by the market through innovation, commitment and professionalism.
❖   Developing our personnel through investment in training to become experts in their field.

Our mission is to build the largest synthetic and steel slings the world's heavy lift industry demands, to the highest quality standards, as well as to be a trusted solution provider in any industry that requires our services and products related to their rigging, lifting and mooring needs.

3.2   Governance

Our Board of Directors (the Board) oversees and reviews the management of the Group's corporate governance matters. Our Executive Board Members and management oversees and reviews all operational matters relating to our business. For corporate sustainability, the Board is supported by the Corporate Sustainability Committee (CSC) which is chaired by our Chief Operating Officer (COO) and includes designated senior executives. CSC provides leadership and approval over corporate sustainability matters such as Corporate Social Responsibility (CSR) plan, community investment and environmental initiatives. Supported by CSC, our Corporate Sustainability Champion (the Champion) is our Subject Matter Expert (SME) in the area of corporate sustainability, and pro-actively raises awareness through education and training across the organization. Through the Corporate Sustainability Work Group (CSWG), our Champion engages businesses and functions in collectively executing the CSR plan, identifying and managing the Environment, Social and Governance (ESG) Factors as well as engaging sustainability stakeholders. Businesses and functions provide back-to-back assurance over the quality of information for sustainability reporting.
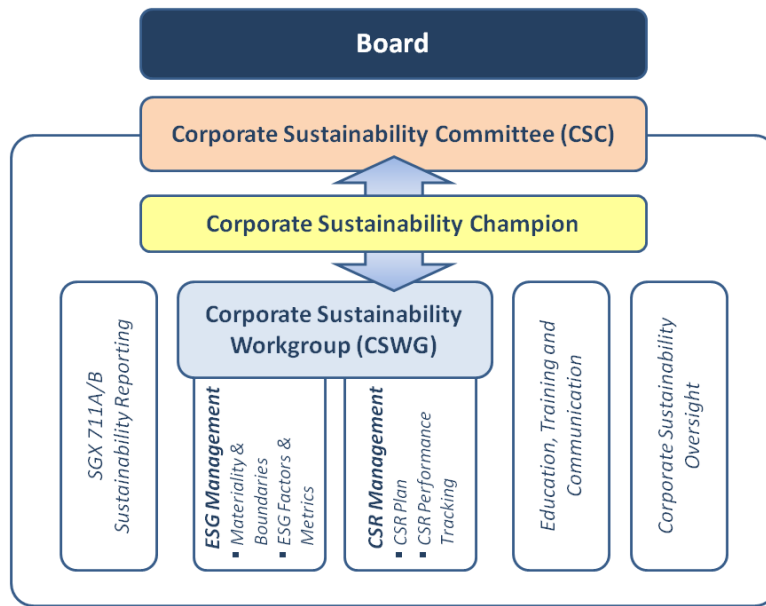
3.3 Ethics and Compliance

Being a listed company in the Singapore Exchange (SGX), we are managed to the highest standards of corporate governance as required in the listing rules. We strictly conform to local and international best practices. Our corporate governance framework covers ethics and compliance through a Code of Conduct as well as action guidelines which are to be adhered by the officers and employees across the organization. Every new employee is introduced to our Code of Conduct in the Employee Handbook and our policies on ethics and compliances which includes areas such as anti-corruption. Communication channels, such as Whistle-Blower and Board escalation process, are in place to enable all employees and individuals engaged in business activities to report complaints of unethical behaviour. We have a dedicated officer who maintains a register of incidences regarding ethics and compliance issues and escalates to the management where appropriate.

4   INTEGRATING SUSTAINABILITY INTO OUR BUSINESS

We believe corporate social responsibility is a key driver towards long-term sustainability. Such responsibility is pragmatically integrated into our business practices as one of the core values in our corporate culture. Embedding such responsibility into our management processes across the value chain allows us to establish credibility among our stakeholders. Through our action today, we play a part in influencing the environment for our future generations. Through integrating the notion of sustainability in our business, we ensure that our business strategy and operations are in line with a long-term vision towards a conducive and sustainability future.

KTL Global Limited is listed on the Singapore Stock Exchange and is committed to servicing our multinational customers by establishing rigging hubs at key locations around the world.

Our Singapore operation is located in Jurong and is the head office and administration centre for the group companies and operates a specialised rigging and service facility. This facility is responsible for the manufacture of all synthetic lifting products, specialised steel wire rope products and R&D activities. The facility is ISO 9001: 2008 certified and BIZSAFE 4 accredited.

Our newest facility is a 25,000 square meters manufacturing plant located in Tanjung Langsat in Malaysia, 45km by road from Singapore. It commenced business in mid 2015. This facility is equipped with our unique KimTest 3000 test bed, capable of a maximum test load of 3,000 metric tons and able to accommodate slings of up to 200 meters in length – one of the most potent sling testing facilities worldwide. With full heavy lift sling manufacturing (up to 600mm diameter) and testing capability, KTL Offshore (Malaysia) Sdn Bhd is one of the world's powerhouse rigging facilities.

In Indonesia, PT KTL Offshore was established in 2008 with a service facility in Batam; followed later on with a sales office in Jakarta. Our Indonesian business is expanding and is an important element in maintaining KTL's service footprint in the SE Asia region.

In the United Arab Emirates (UAE), our manufacturing and testing facility covering 10,000 square meters was established in 2010 in the expanding Hamriyah Free Zone. Equipped with heavy lift sling and grommet manufacturing capability and a testing facility of up to 1,000 metric tons, KTL Offshore (Middle East) FZC has quickly established itself as the premium rigging solution provider in that region – and also a significant contender in the European heavy lift market.

4.1   Sustainability Management Framework

In July 2017, we took the initiative to establish our sustainability reporting framework. We performed an analysis on our business and operation models as the basis for our stakeholder mapping and materiality assessment. Through our analysis, we identified five key stakeholder groups within our sustainability context and their respective material issues are to be shown in this report.

4.2   Key Stakeholders and Material Issues

We have a regular review, assessment and feedback process in relation to Environmental, Social and Governance (ESG) topics. Key to this is our regular Risk Assessment and Control Self-Assessment exercise which entails the identification, assessment and documentation of material risks and corresponding internal controls. Such material risks include fraud and corruption, environmental, health and safety, and human capital risks which are ESG-relevant. We are continuously improving the adequacy and effectiveness of our Risk Assessment and Control Self-Assessment processes in response to changing business and operation environment.

Sustainability Report

Through regular stakeholder engagement, we identify and review material issues that are most relevant and significant to us and our stakeholders. For external stakeholders, priority is given to issues important to society and applicable to us. Then, we prioritize our sustainability efforts and report issues that are most material to its business and stakeholders. Considering that specific stakeholders and material issues are specific in countries and locations, we are reporting the stakeholder engagement and material issues for our Singapore operations in this report.

Stakeholders	Material Issues	Significance
Future Generation	❖ materials, recycling of product material and packaging ❖ Environmental education of our employees and customers ❖ Reduction of carbon emissions ❖ Energy consumption	Our sustainability agenda for the environment and future generation is embedded into the day-to-day business activities among our staff. We continue to strive to improve from a holistic perspective through the company culture and practices. Within the big picture of sustainability, we take steps to focus on key goals such as curbing global warming, conserving and recycling resources. Such areas are crucial to a sustainability economic ecosystem for our customers which are keys to our business sustainability.
Employee	❖ Employee well-being through workplace health & safety and work life balance ❖ Regular training of employees on critical skillsets to sustain competitiveness ❖ Competitive compensation scheme to retain talents ❖ Non-discrimination, diversity and equality ❖ Senior management engagement with employees	An ethical and professional working environment is crucial in cultivating a corporate culture which motivates and empowers our employees to meet their full potential both professionally and personally.
Customer	❖ Safety of our customers in our services delivery ❖ Customer data privacy ❖ Customer satisfaction and customer-centric approach ❖ Compliance with industry standards and practices such as IMCA M179 or ASME B30.9 depending upon product type.	The quality and safety of our services and products to our customers are the core focuses of our commitments. Through our quality and safety commitments to our customer, we will, in turn, be contributing to their own successful sustainable development.
Supplier	❖ Environmental, labour and human rights impact in the supply chain	To effectively and meaningfully implement our sustainability agenda, it is important that our suppliers and partners share our values in their business practices in the areas such as the environment, human rights, labour practices and corporate ethics. Such alignment of values is a crucial part of building mutually beneficial relations with supplier and channel partners to enhance both their own competitiveness and that of ours.

Community	❖ Impact on communities and local economies, and future generation education ❖ Economic value generated and distributed to local community	In our vision in moving our business to high-value-added business areas, abilities to identify and attract people with knowledge and talent are crucial to sustainability of our businesses. Within a broad range of our community engagements, we focus on the education of today's youth and providing financial and practical support to targeted local and communities, through donation, sponsorship, fundraising and voluntary activities.
Common to All Stakeholder Groups	❖ Compliance with prevailing laws and regulations ❖ Good corporate governance & ethics, transparency and non-financial reporting ❖ Ethical business practices such as anti-corruption ❖ Grievance mechanisms	Legal compliance and ethical practices are the core foundation of our business. Our culture is established and sustained through strong corporate governance, transparent reporting and open communications with all our stakeholder groups.

4.3   Alignment with International Initiatives

4.3.1   Sustainable Development Goals (SDGs)

Established in 1945 under the Charter of the United Nations (UN), the General Assembly occupies a central position as the chief deliberative, policymaking and representative organ of the United Nations. Comprising all 193 Members of the United Nations, it provides a unique forum for multilateral discussion of the full spectrum of international issues covered by the Charter. It also plays a significant role in the process of standard-setting and the codification of international law.

On 25 September 2015, the UN General Assembly adopted the 17 Sustainable Development Goals (SDGs) to end poverty, protect the planet, and ensure prosperity for all as part of a new sustainable development agenda. Each goal has specific targets to be achieved over the next 15 years. Although the SDGs are primarily aimed at governments, they represent an important opportunity for businesses to also act for a more sustainable world. We will use SDGs as one of the guiding principles for our sustainability initiatives.

We acknowledge that our participation in reaching the SDGs has room for improvement. As we advance on our sustainability journey, we will continue to assess our alignment with the SDGs and, whenever possible, redirect our internal priorities and sustainability strategy to more effectively and comprehensively address the goals.

SDGs Logo Source: http://www.un.org/sustainabledevelopment/news/communications-material

SDG Goal	Relevant Targets to Our Businesses *(Source:* *http://sustainabledevelopment.un.org)*	Our Participation
13 CLIMATE ACTION	13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.	We have our own internal processes and environmental policies to reduce electricity and fuel consumption. Our approach to mitigating climate change includes staff training and implementing energy-efficient

		measures. We monitor and report our GHG emissions and set reduction targets.
15 LIFE ON LAND	15.1: By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements.	All the paper used in our offices are either Forest Stewardship Council (FSC) certified or made from KHAN-NA. We actively promote the use of such papers across our organisation. Through that, the Company supports efforts in mitigating global warming and the creation of positive rural community engagement, job opportunity, and better livelihood for the farmers and members of the community.

3 GOOD HEALTH AND WELL-BEING	4 QUALITY EDUCATION	5 GENDER EQUALITY	8 DECENT WORK AND ECONOMIC GROWTH	The following SDG goals are relevant to our business, operations and value chain. They are addressed in our various policies at group level. Such goals are also embedded in various initiatives carried out across the organization.
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	10 REDUCED INEQUALITIES	11 SUSTAINABLE CITIES AND COMMUNITIES	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	
13 CLIMATE ACTION	15 LIFE ON LAND	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	17 PARTNERSHIPS FOR THE GOALS	

1 NO POVERTY	2 ZERO HUNGER	6 CLEAN WATER AND SANITATION	7 AFFORDABLE AND CLEAN ENERGY	We do not believe these goals are relevant to our business or industry. They are not within our boundaries and scope of influence; therefore, we are currently unable to make noticeable contributions to such goals.
14 LIFE BELOW WATER				

4.3.2   United Nations Global Compact (UNGC)

The United Nations (UN) Global Compact is a United Nations initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment and anti-corruption.

Below are the references of our report to the 10 principles of the UN Global Compact.

Principle		Report Section
Human Rights		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights.	5.2.2.1, 5.2.6
Principle 2	Make sure that they are not complicit in human rights abuses.	5.2.2.1, 5.2.6
Labour		

Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	5.2.2.1, 5.2.6
Principle 4	Elimination of all forms of forced and compulsory labour.	5.2.2.1, 5.2.4.1
Principle 5	Effective abolition of child labour.	5.2.1, 5.2.2.1
Principle 6	Elimination of discrimination in respect of employment and occupation.	5.2.2.1, 5.2.6
Environment		
Principle 7	Businesses should support a precautionary approach to environmental challenges.	5.1.1
Principle 8	Undertake initiatives to promote greater environmental responsibility.	5.1.2, 5.1.3, 5.1.4
Principle 9	Encourage the development and diffusion of environmentally friendly technologies.	5.1.2, 5.1.3, 5.1.4
Anti-Corruption		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.	3.3

4.4   Awards and Achievements

Year	Description	Year	Description
1997	Since 1997, KTL Offshore Pte Ltd had achieved ISO 9001 certification with the latest being ISO 9001 (2015)	2012	KTL Offshore Pte Ltd achieved Circle of Excellence, Singapore, a prestigious initiative of the renowned Regional Publication Trade, Asia Business Journal, which acknowledge the outstanding performances in Offshore & Marine Industry.
2013	KTL Offshore (Middle East) FZC awarded Top 3 – 2012 SME award by Hamriyah Free Zone Authority	2014	Since 2014, KTL Offshore (Middle East) FZC had achieved ISO 9001 certification with the latest being ISO 9001 (2015)
2017	KTL Offshore Pte Ltd had obtained bizSAFE level 4 certification	2018	KTL Offshore (Middle East) FZC is a full member of the Lifting Equipment Engineers Association ("LEEA")

5   STAKEHOLDER ENGAGEMENT

We believe that good Corporation Social Responsibility (CSR) practice goes hand-in-hand with good corporate management practice. We also recognize that it is vital that our management approaches are adaptable to the dynamics of business and operation environment in such a way that we can continuously assess our impacts, develop sustainability objectives and respond in a proper manner to meet our stakeholders' expectations. Our CSR framework is based on our approach to sustainability and includes policies and measurement mechanisms to monitor the impacts made by our businesses and operations.

Key to the success of our sustainability programme is regular and up-to-date communication about our CSR policies and activities to all our stakeholders, and the provision of appropriate feedback mechanisms so that we can monitor and evaluate how we are doing and explore new possibilities stimulated by stakeholder responses. We see our sustainability reports as being a critical component of this continuous cycle of communication and evaluation. The overall sustainability context of the stakeholder engagements is managed through our CSR plan for our sustainability governance oversight.

Stakeholder	Management Approach	Initiatives	Outcome and Responses	Boundaries
Future Generation	Environmental Management System (EMS), Environmental policy, EMS guidelines, Waste Recycling/Management, Green Campaigns	Internal Awareness and Education	Energy Efficient Lighting (e.g. LED), Digital Filing and Document to Reduce Paper Consumption.	Singapore & Middle East Operations
Employee	Code of Conduct, Fair Employment Practices, Training and Career Development, Flexible Work Policy, Pension Scheme, WHS Framework, bizSafe	Staff Communication Sessions, Staff Feedback Process, Staff Exit Interviews	Work Life Balance Programmes, Training Programmes, Employee Benefits, Re-engagement	Singapore & Middle East Operations
Customer	Customer Relationship Management System, Policies on Quality Assurance, Data Security for Customer Information, Privacy policy, ISO9001	Customer Feedback Process, Competitive Benchmarking survey, Customer Data Protection Awareness and Education Program	Customer Complaints and Compliments Statistics / Trending, Create and Engage Brand Ambassadors	Singapore & Middle East Operations
Supplier	Supplier Selection and Regular Review Process	Feedback and Communication with Suppliers through Supplier Performance Review	Incident Register, Supplier Engagement	Singapore & Middle East Operations
Community	Selection of Community Initiatives in Alignment with Organization Goals	CSR Programme, Awards and Accolades, Corporate Rebranding	Employ Merit System and Accolades Programmes	Singapore & Middle East Operations

5.1 Protecting Our Environment for the Future Generations

5.1.1 Our Approach

We are committed to maintaining and building on the same stringent environmental policies and standards as our parent company and key regional affiliates. We continually seek new and innovative ways to reduce the environmental impact of our products and services while maintaining the highest levels of quality. We recognise our responsibility to protect the environment for the health and wellbeing of future generations.

5.1.2 Reduction of Carbon Footprint

We recognize that the effective management and monitoring of its carbon footprint can reduce operating costs, raise brand profile, create a competitive edge and increase stakeholder value. Our carbon footprint is measured in terms of Greenhouse Gas (GHG) emission. However, GHG emission is an absolute measure of how much carbon dioxide equivalent (CO_2e) is emitted. Our GHG emission is predominantly indirect (Scope 2) emission. We have insignificant direct (Scope 1) emission, and we do not include the GHG emissions generated by our suppliers (Scope 3).

Considering the changes and dynamics of business and operations, we established our GHG emission efficiency index for consistent tracking of carbon footprint over time. To this end, we have set a target for GHG emission efficiency improvement of 13% from our 2017 level by 2030. Our target for GHG emission improvement is 1% per year. Although various business lines and operations account for different percentage of GHG emissions across the organization, they all support this target and have aligned our environmental objectives accordingly.

In CY2018, our CHG efficiency index stands at 0.08, which is 11% improvement from last year. In comparison to our base year "CY2017", it is an 11% improvement, and we are on track towards our target by 2030.


GHG CARBON EMISSION INDEX
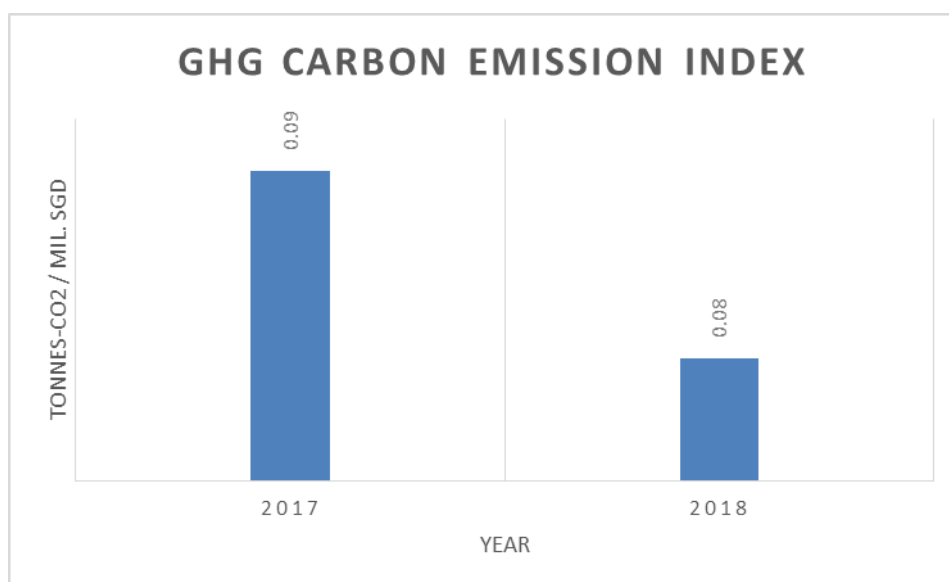
5.1.3   Reduction of Paper Consumption

All our employees are urged to minimize paper wastage at work by adhering to our Internal Paper Usage Reduction Guidelines. For example, double-sided printing is set as a default, lower grammage paper is used for daily printing, and blank sides of unneeded single-sided copies are used for printing drafts. Paper re-use and recycling habits are also cultivated through initiatives such as our in-house reminders posted near the copy machines.

All waste paper from our own offices is collected for recycling. Further, we encourage all employees to adopt digital documents instead of paper documents with an aim to further reduce paper consumption.

Considering the changes and dynamics of business and operations, we established our paper consumption index for consistent tracking of paper consumption over time. To this end, we have set a target for a paper consumption improvement of 13% from our 2017 level by 2030. Our target for paper consumption improvement is 1% per year. Although various business lines and operations account for different percentage of paper consumption across the organization, they all support this target and have aligned our environmental objectives accordingly.

In CY2018, we consumed total of 2,479 kg of paper, 100% of which are either Forest Stewardship Council (FSC) certified or made from KHAN-NA. Our paper consumption index standards at 94.73.
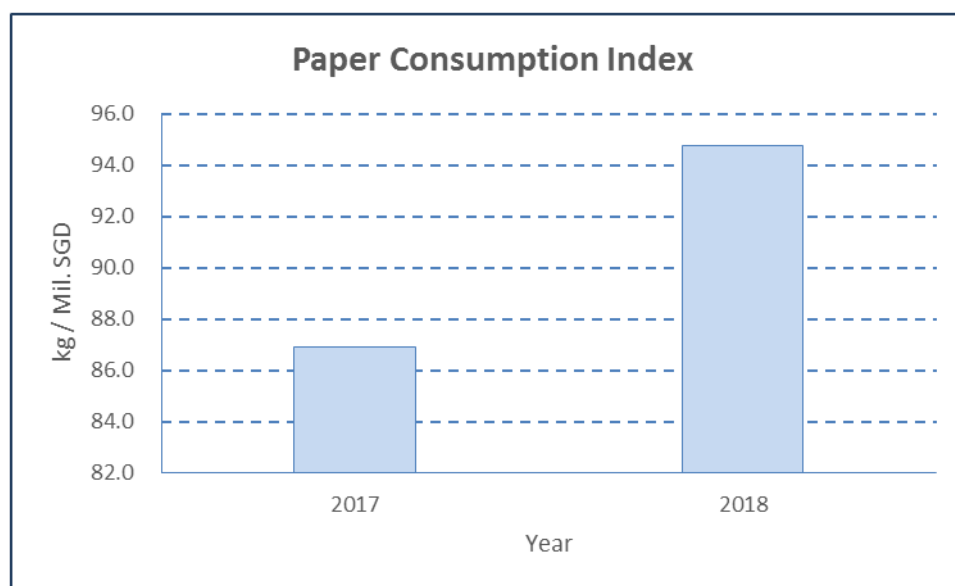
5.1.4   Promoting Green Practices

The Group is committed to protect the environment and ensure that its operations are conducted responsibility. In order to achieve this, the Group adhere strictly to national laws and international standards, such as the Environmental Public Health (Toxic Industrial Waste) Regulations 1988 in Singapore. The Group strives to make a positive contribution to the local environments in which we operate and seek to reduce any potential negative impacts.

5.2   Caring for Our Employees

5.2.1   Our Approach

Our people are our most valuable resource and investing in their professional and personal well-being is vital to our business sustainability. Our goal is to establish work ethics among our employees, which are in line with our core values and code of conduct. They are the foundation upon which we build all our business initiatives and conduct our day-to-day activities.

We recognise that a motivated workforce will convey a positive and powerful message to all our key stakeholders, such as our customers, suppliers and the members of the community. By attracting, nurturing, empowering and rewarding our employees, we create an environment conducive for innovation and inspiration flourish to further boost our competitiveness. Such commitment to our employees promotes a corporate culture of passion, quality, excellence and trust within the organization which reflect in our ability to create values to our stakeholders.

Our Human Resource (HR) management principles and policies have been developed and established based on fair employment practices with the goal of attracting, supporting and maintaining a motivated workforce. Our HR policies cover key areas such as remuneration, benefits, health and safety, career development and training. Such policies are communicated to all employees through our comprehensive Employee Handbook which is regularly reviewed by our management and we constantly seek feedback from our staff to ensure that our decisions are aligned as much as possible with their needs.

Our business operates in an environment which comprises diverse races, cultures and geographic locations. With this in mind, our HR polices are implemented across the organization within the principles with pragmatism, taking into consideration of the prevailing laws and regulations as well as local culture, norms and racial sensitivity.

5.2.2   Employment Practices

Our employment practices focus on maximizing the strength of our employees by providing equal opportunities based on merits, and help our employees to develop strength through our comprehensive training and development programme. We regularly review the performance and development of our employees to effectively match their strength to their job specifications. Our performance-based reward scheme provides guidance and motivation to our employee to perform to their potentials in alignment with the objectives of the company.

5.2.2.1   *The Tripartite Guidelines on Fair Employment Practices*

We proactively pursue and adopt best practices in HR management. Our HR practices are guided by the Singapore Tripartite Alliance for Fair and Progressive Employment Practices. The Singapore Tripartite Alliance comprises the Ministry of Manpower, Singapore National Employers Federation and National Trades Union Congress. The Tripartite Alliance has formulated guidelines on fair employment practice for adoption by Singapore employers, embracing the recruitment, training, treatment and reward of employees.

5.2.2.2   *Communications*

As our Company grows, effective communications across the organization are crucial to ensure continuous alignment of objectives of the employees and the organizational objectives. We achieve this through our various communication sessions customized based on target employees. Communication sessions for our managers are held on a regular basis. Agendas covered at these sessions are customized in appropriate to the target functional scope of the managers. For example,

in managers' meeting, operational agendas such as leadership and operation issues may be discussed while at the quarterly sessions high level topics include strategic business directions, new service launches, ongoing developments and key project reviews.

5.2.2.3   Employee Feedback

We value our employee's expertise in their areas of responsibilities. Therefore, their feedbacks are important in the improvement of overall management and operation of the organization. Through various established processes of employee engagement, such as employee objective setting, performance review as well as exit interview in the case of resignations, we gather such valuable feedbacks for the continuous improvement of our organization.

In addition, there are other feedback channels for areas specific to business and function, such as health and safety issues and compliance issues. Such feedbacks are managed by the leaders and managers of their specific business and function domain. We have also established reporting and escalation channel should the feedback requirements the attention of higher management.

5.2.2.4   Career Development and Training

We recognise that consistent and ongoing education is critical to maintaining a competitive, skilled, productive and motivated workforce. Employee career development and performance management established based on merits and contributing skill sets towards the organization objectives through objective settings and regular performance reviews. We continue to review and improve our career development and performance review process in light of the changing business and operation environment.

Our training programme covers a variety of areas catering for employees with difference job scopes and skills set requirements. Our core training curriculum and contends are developed guided by well-established industry and international standards such as ISO-9100 and bisSAFE. In addition, specific training curriculums are developed based on the specific requirements of the specific businesses and functions. Training topics range from soft skills development in areas such as communications and leadership, to technical programmes covering project management and office productivity tools.

In CY2018, employees each received an average of 2.1 hours training. We recognized that the training requirements vary depending on the levels of management responsibilities. Each managerial and non-managerial staffs receive an average of 2.4 hour and 1.6 hours of training respectively. In light of changing business requirements and opportunities in variety of training methodologies, we continue to revise our training curriculum and programme to align with organization objectives and to strive for effectiveness and efficiency in our training approach.

Average Training Profile
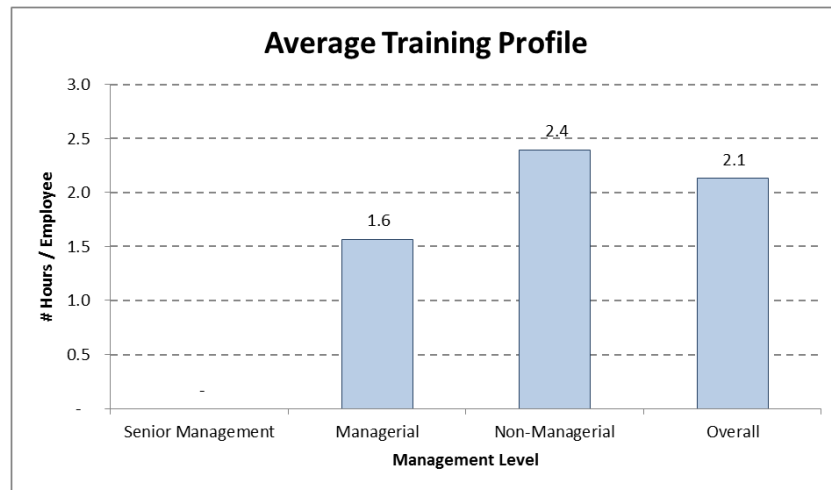
5.2.3   Workforce Diversity

Our business thrives on diversity. As such, we leverage on a host of strengths and skills that can only come from a diverse workforce embracing employees from various ethnic groups, religion, age and gender.

In CY2018, 36 of our employees were female, comprising 35% of our workforce, while 68 (65%) employees were male. In terms of management function, 6 females (40%) held managerial positions compared to 9 males (60%), while 30 females (34%) and 57 males (66%) held non-managerial positions. The male to female ratio managerial and non-managerial positions were 3:2 and 19:10 respectively. From age profile perspective, there were 18 employees below 30 years old. The number of employees between 30 and 50 years old was 69 as compared 17 employees above 50 years old.

Workforce Profile
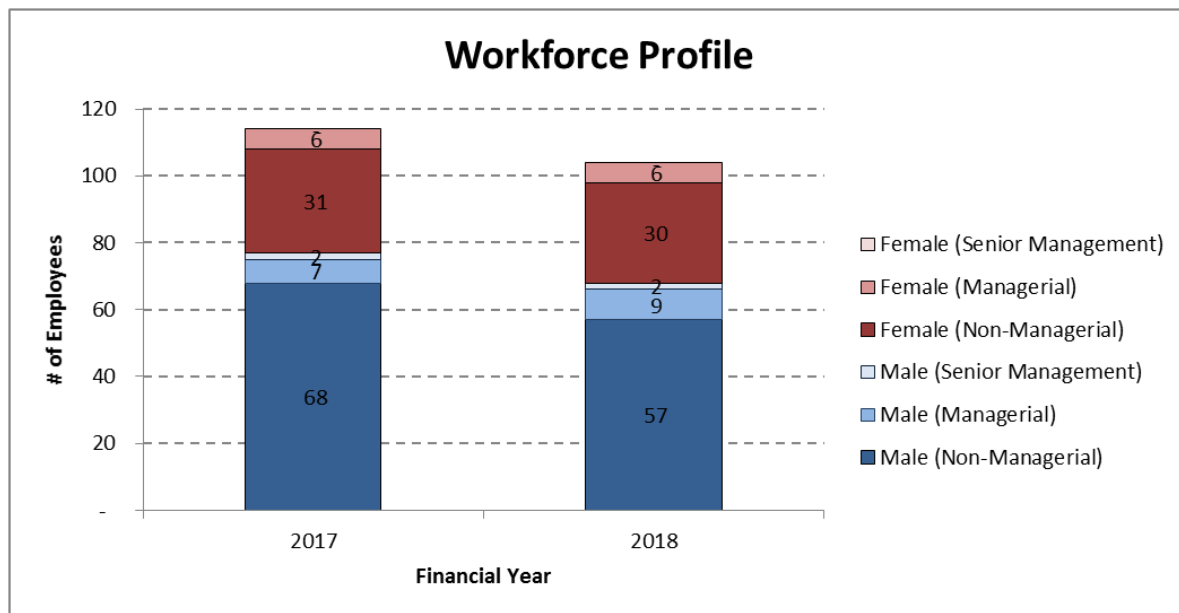
Senior Management
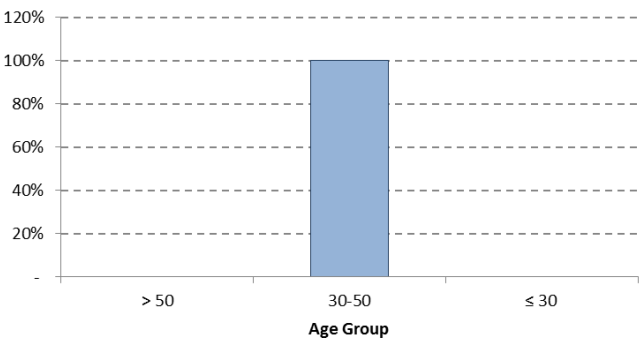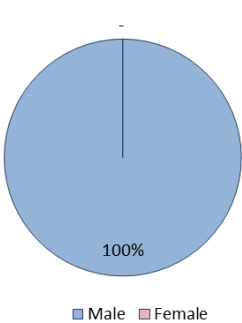
Managerial Staff
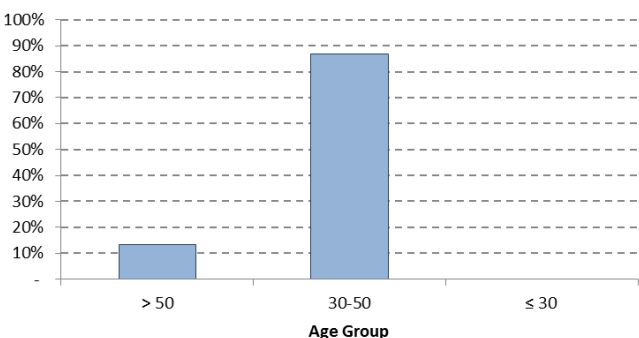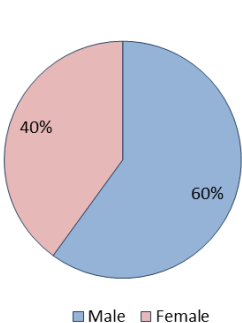
Non-Managerial Staff
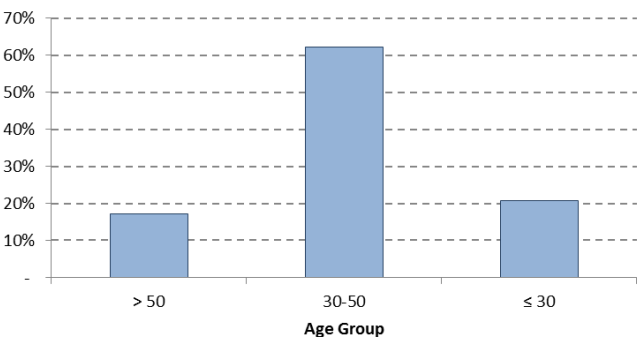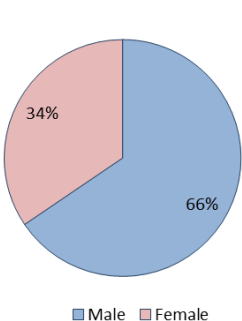
Overall
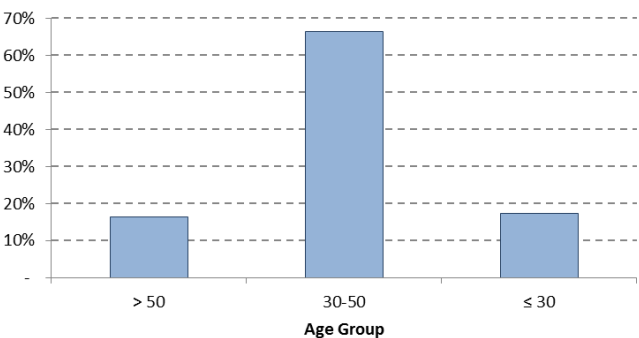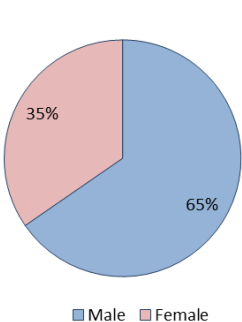
In CY2018, we hired a total of 27 new employees, while 37 resigned during the same period. As a result, we have a net decreased of 10 in our workforce. Out of the new hires, 10 of the new hires were below

the age of 30; 17 were between 30 and 50 years old while none were above 50 years old. The gender ratio of new hires was 15 males to 12 females. For the resignees, 14 of the resignees were below the age of 30; 22 were between 30 and 50 years old while 1 were above 50 years old. The gender ratio of resignees was 24 males to 13 females.

New Hire
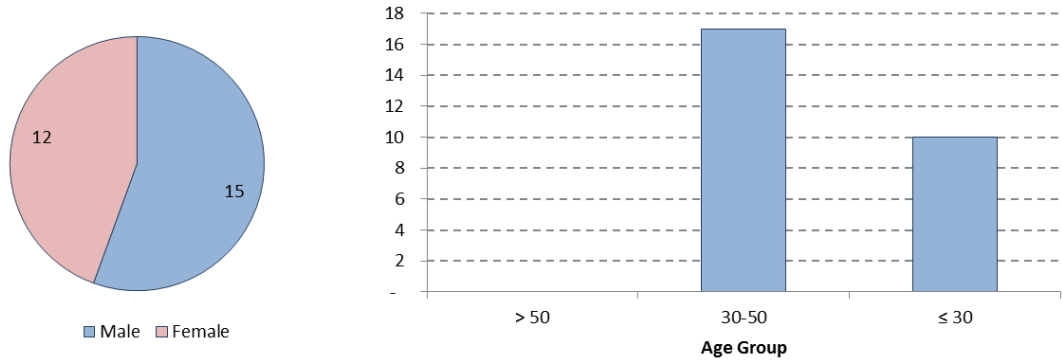
Resignee
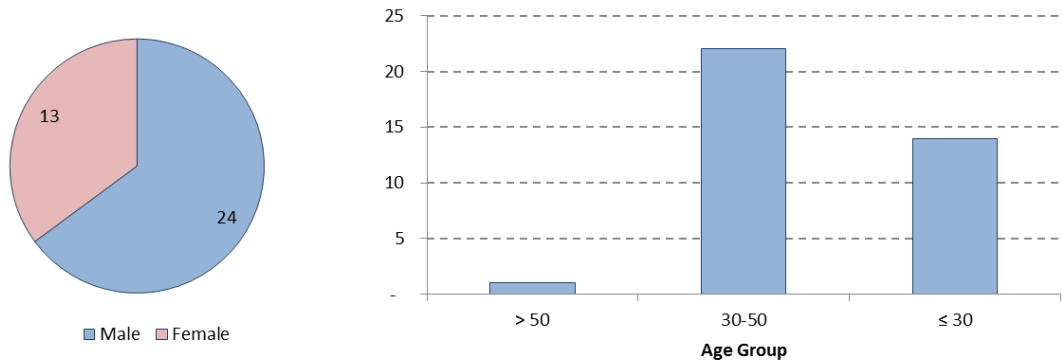
Net Employee Movement
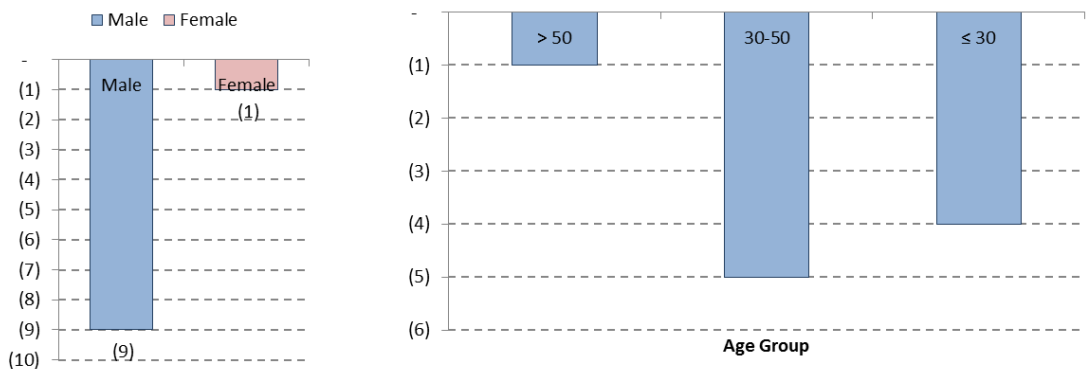
In addition to the human resources we managed under our payroll internally, we also engage external contracted companies as our outsourced vendors which provide outsourced personnel, such as cleaners and security guards who might work within our premises. Although we supervise these people, they are employed by contracted companies and are not included in our head count. We do not employ other types of un-contracted workers.

We expect that all the contracted companies we work with will share our core principles of HR management practices. In our vendor selection process, we take into consideration of their HR management practices as one of the key selection and performance criteria. We regularly review the performance of our vendors based on these criteria as a key basis to determine whether to continue to engage the vendors with their services.

5.2.4 Employee Benefits

All non-managerial employees in Singapore are covered by the Employment Act, which provides basic employment terms and working conditions including contract requirements, remuneration, hours of work, overtime, rest days and annual leave entitlement.

In addition to the statutory benefits outlined in the Employment Act, we provide beyond-compliance-level benefits to our fulltime employees. Examples of these benefits include paternity leave and compassionate leave.

5.2.4.1 Work–Life Balance

While developing the talents of our employees and providing equal opportunities for them to excel are the key drivers for our company, we also recognize that well-being and contentment of our employees pivotal to the success and sustainability of our business and performance. Our employees are our most valuable asset, and we appreciate that their overall well-beings need to be well looked after in order for them to sustain their performance and realize their full potential.

To support our employees to strike a work-life balance, we aim to create an environment that allows our employees to achieve harmony in their personal and professional life. We achieve this through the adoption of a flexible approach to work arrangements and offering programmes to support health and wellness.

We understand that workplace could be at times stressful due to the competitiveness of our workforce and our business. To support our employees in their effort of pursuing excellence, we have various programmes and initiatives to balance their work with fun, and to development an environment and culture of mutual support.

5.2.4.2 Retirement and Healthcare

Our company has presence in various geographic locations where there are various local laws and regulations on pension and healthcare for employees. Our HR management practices comply with such laws and regulations. In Singapore, we participate in the Central Provident Fund (CPF) personal savings scheme, which helps employees fund their retirement, home ownership, healthcare and education. Under this scheme, monthly deductions from employees' gross salaries are paid into their CPF savings accounts. We, the company, make employer contributions to these accounts, according to rates stipulated in the CPF Act. In addition to CPF contributions, we provide comprehensive medical coverage for all employees. For more information on the CPF scheme and contribution rates, please go to www.cpf.gov.sg.

5.2.5 Safety and Health in the Workplace

We are committed to Workplace Safety and Health (WSH) and take every precaution to prevent occupational injuries among employees. We believe that optimum work conditions not only make our employees safer, but also boost morale. As an essential requirement we are in compliance with the Ministry of Manpower's Workplace Safety & Health Act. In addition, we have attained certification for ISO 9001 (2015) and bizSAFE level 4. These well recognized standards provide us with the frameworks to manage risks associated with safety and health in our workplace.

5.2.6   Individual Rights

Respecting and protecting basic human rights is fundamental to all our operations and deeply ingrained in our Code of Conduct, which applies to all employees. Labour rights, the prohibition of discrimination and harassment, protection of privacy, prohibition of forced and child labour, and workplace health and safety are all strictly observed within the work environment and discrimination and harassment of any kind is not tolerated at our company.

We also respect our employees' rights to freedom of association as well as their membership of trade unions and other professional bodies.

5.3 Focusing on Our Customers' Needs

5.3.1 Our Approach

Customer service, quality products and the highest level of product safety have always been our priorities, with customer satisfaction being the goal of all our corporate activities. Customer retention begins with trust, and we place the utmost importance on training our employees in customer service excellence as well as in continuously striving to improve the quality and safety of our products and services.

Open and frequent communication and responsive feedback are ingrained into our daily activities with customer interaction. In addition to striving for excellence in product service and support, we attach enormous importance to data privacy. We have process and controls in place over confidential and sensitive data related to our customers such as contracts.

Since 1997, we have been certified under the ISO 9001 standard for quality management systems. The certification has helped us increase the control of our internal processes and the quality of our services.

5.3.2 Customer Feedback and Satisfaction

We listen to our customers and take their opinions very seriously. We consolidate customer feedback through a range of communication channels including our website, regular customer survey, and our customer service personnel. Through our customer feedback system, we capture our customers' comments for analysis and action.

We take customer feedback seriously and in the case of non-conformance, our sales department will report the complaint from customer to a coordinator whom will issue a non-conformance report (NCR). The NCR will be submitted to the Quality Management System controller who will follow up with an investigation. Depending on the findings, the QMS will follow up with the respective departments such as production to take corrective actions. For CY2018, we had a customer satisfaction rating of 89% and all customers' complaints had been duly resolved.

5.3.3 Service Quality and Safety

Reliability and quality of our products are of paramount importance to us. Health and safety of our customers is always our priority. To ensure product safety to our customers, we have in place a set of key quality assurance processes and standards, such ISO 9001 and bizSAFE, to ensure compliance with regulations and international standards. Ultimately, we aim to totally eliminate product safety incidents so as to foster a 'Safety First' culture through employee training and quality control.

We have established a comprehensive Quality Policy with specific Quality Objectives. Such Quality Policy and Objectives underpin our product quality management approach and processes.

Our quality management approach identifies our stakeholders, key aspects of the product quality and the impacts on our stakeholders. Our quality management processes take an end-to-end quality view from the areas of planning, support down to operation, performance evaluation and improvement. At each key aspects of the end-to-end quality management processes, we have leadership in place to spear head the quality improvement processes. We have mapped out the sequence and interaction of business processes to ensure seamless collectively management of inter-dependencies of the quality management processes among the leaderships.

5.3.4   Data Safety and Privacy

Ensuring safety and privacy of our customers' data is of great priority to us. We have processes and controls in place for handling and communicating sensitive and confidential information of our customers such as contracts, customer orders and service delivery orders. Our information security policies ensure our customers' data are managed in accordance to the level of confidentiality. We strictly observe all local laws and internal regulations applicable to personal information protection.

5.4 Partnering Our Suppliers

5.4.1 Our Approach

As a part of our ambition to realize sustainability throughout our value chain, we extend the application of responsible business practices to our local partners and suppliers. We recognise that we are only at the beginning of our journey to integrate sustainable business practice throughout our supply chain, and we commit in our pragmatic approach to continuous improvement. We aim to identify new opportunities for collaboration with our suppliers, gradually increase transparency and continue to build shared capacity to minimise our indirect environmental and social impacts.

5.4.2 Supplier Selection

Our key suppliers are carefully selected through our supplier selection process. When selecting our key suppliers, we examine criteria such as financial health, quality of products and services, as well as competitiveness of pricing. In addition, we also take into consideration of the overall sustainability policies adopted by our suppliers. Our final decision on supplier selection is based on the overall assessment which takes a balanced view across all selection criteria.

5.4.3 Supplier Review

We regularly review the performance of our key suppliers to determine whether to extend our partnership with them. During the key supplier review process, we engage with our key suppliers to communicate our expectations and mutual feedbacks. Such review process ensures alignment of our key suppliers' services and products to our business requirements and sustainability objectives through pragmatic and continuous improvement in our partnership with our key suppliers.

5.5 Supporting Our Community

5.5.1 Our Approach

We want to support to the local communities in which operates and to give back to the local communities. Over the next few years, the Group aims to promote and sponsor initiatives in support of local communities and charitable organisations, such as through cash contributions, the donation of goods (food or garments) and organisational support to national and international projects.

6 PERFORMANCE TABLE

6.1 Energy Usage and CO_2 Emissions

GHG emissions are measured in tonnes (t-CO_2); the underlying measures for direct and indirect CO_2 emissions calculation are electricity consumption in kilowatt Hours (kWh) and fuel consumed. The electricity and fuel we purchase are both from non-renewable sources.

Our business and function grow over time; the GHG emissions and electricity consumption vary. To ensure consistency and comparability of the GHG emission and electricity consumption measures over time, we create a GHG emission index and electricity consumption index for our performance monitoring. The index adjusts the GHG emissions and electricity consumption for the size of our activities. We normalize the amount GHG emissions and electricity consumption by the amount of our revenues which we use as a proxy of the size of our activities. The GHG emission index is measured in t-CO_2 per SGD million and the electricity consumption index is measured in kWh per SGD million.

	Performance		Target	
	CY2017	CY2018	CY2018	CY2019
GHG Emission Index (kg-CO_2 / SGD million)	0.091	0.082	0.089 [-1%]	0.081 [-1%]
Electricity Consumption Index (kWh / SGD million)	17,751	15,627	17,600 [-1%]	15,500 [-1%]

CY2018 Performance	We have used CY2017 data as the base year for our performance tracking towards our 2030 goals. This year 2018 stands at 15,627 kWh/ SGD million. Compared to our goal of 13% improvement by 2030, the to-date performance is 12% improvement compared to the pro-rated to-date target of 1%. In comparison to CY 2017, we have achieved 12% year-to-year improvement, which is 11% above the expectation.

On the GHG Emission Index, we had also improved from 0.091 kg-CO_2 / SGD million, to 0.082 kg-CO_2 / SGD million, which is a 12% decrease and is 11% above the expectation.

We will continue to thrive to further improvements towards our 2030 goals. |

6.2   Paper Consumption

We capture the data for paper consumption by how many reams of paper used where one ream is equivalent to 500 sheets of paper. To ensure consistency and comparability across various paper sizes, such as A3 and A4 papers, we measure the paper consumption by the weight of paper used which is adjusted for the various sizes and quality of papers.

Our business and function grow over time and the paper consumption patterns vary. We devise a paper consumption index for our performance monitoring. The index adjusts the paper consumption for the size of our activities. We normalize the amount of weights of paper consumed by the amount of our revenues which we use as a proxy of the size of our activities. The paper consumption index is measured in kilograms per million SGD.

	Performance		Target	
	CY2017	CY2018	CY2018	CY2019
Weight of Paper Consumption (kg) [% of paper with FSC certification]	100%	100%	100%	100%
Paper Consumption Index (kg / SGD million)	86.93	94.73	86.00 [-1%]	92.83 [-2%]

CY2018 Performance	We have used CY2017 data as the base year for our performance tracking towards our 2030 goals. This year 2018 stands at 94.73 kg/ SGD million. Compared to our goal of 13% improvement by 2030 at the Paper Consumption Index level of 75.62 kg/ SGD million, we are behind by 22% and stands at Paper Consumption Index level of 94.73 kg / SGD million. Based on the performance in CY2018, we need to achieve a year-to-year performance improvement of 2% to achieve our goal.

We will thrive for further improvements towards our 2030 goals. |

6.3   Employment Profile

	Performance		Target	
	CY2017	**CY2018**	**CY2018**	**CY2019**
Male : Female ratio in non-managerial positions	68 : 31 (Total = 99)	57 : 30 (Total = 87)	-- (Total = --)	-- (Total = --)
Male : Female ratio in managerial positions	7 : 6 (Total = 13)	9 : 6 (Total = 15)	-- (Total = --)	-- (Total = --)

CY2018 Performance	We have not set a target for this ratio as the ratio achieved for CY2018 and CY2019. Due to the nature of the business the Group is operating in, there is a higher ratio of Male: Female in non-managerial positions. For the ratio of Male: Female in managerial positions, the ratio is already quite balance.

6.4 Employees Engagement and Training

	Performance		Target	
	CY2017	**CY2018**	**CY2018**	**CY2019**
Average Training Hours per Employee	3	2	-	-

CY2018 Performance	We have not set a target for this ratio as the ratio we achieved in CY2017 and CY2018 had enabled the Group to deliver with quality and timely, as well as meeting international safety standards. We will monitor our employees' engagement and training profile every year.

6.5   Customer Feedback

		Performance		Target	
		CY2017	**CY2018**	**FY2018**	**FY2019**
Customer Index	Satisfaction	88%	89%	90%	90%

CY2018 Performance	We have used CY2017 data as the base year for our performance tracking towards our 2030 goals. This year 2018 stands at 89%. Compared to our goal of 90%, we are behind by 1%. On annual basis, our year-to-year performance has improved by 1%. We will continue to thrive to further improvements towards our 2030 goal of 90%.

6.6 Supplier Screening for Sustainability Criteria

	Performance		Target	
	CY2017	**CY2018**	**CY2018**	**FY2019**
Key Suppliers Screened for Sustainability Criteria (%)	100%	100%	80%	82%

CY2018 Performance	As of CY2017 and CY2018, the Key Suppliers Screened for Sustainability Criteria stands at 100%.

6.7   Community Contribution

	Performance		Target	
	CY2017	**CY2018**	**CY2018**	**CY2019**
Number of Beneficiaries	--	2	--	--

CY2018 Performance

We want to support to the local communities in which operates and to give back to the local communities.

In CY2018, the Group has made losses and is undergoing restructuring efforts to improve its business operations. Contributions were made to 2 beneficiary in Singapore.

We will thrive to further improvements in our contribution to the community.

7   GRI CONTENT INDEX

This report is prepared in accordance with the Global Reporting Initiative (GRI) Standards Core option. We did not seek external assurance for this report.

N.B.: *AR = Latest Annual Report June 2017 available, SR = Sustainability Report (i.e. this report)*

GRI Reference		Disclosure	Response
General Standard Disclosure			
Organization Profile	102-1	Name of the organization	*SR Section* 2
	102-2	Activities, brands, products, and services	*Refer to http://www.ktlgroup.com/*
	102-3	Location of headquarters	*Refer to http://www.ktlgroup.com/*
	102-4	Location of operations	*Refer to http://www.ktlgroup.com/*
	102-5	Ownership and legal form	*AR Page 66*
	102-6	Markets served	*AR Page 88*
	102-7	Scale of the organization	*Refer to http://www.ktlgroup.com/*
	102-8	Information on employees and other workers	*SR Section 5.2.3*
	102-9	Supply chain	*SR Section 5.4, 5.4.1, 5.4.2, 5.4.3*
	102-10	Significant changes to the organization and its supply chain	*No significant changes*
	102-11	Precautionary Principle or approach	*SR Section 3.2, 3.3, 4, 4.1, 5, 5.1.1, 5.2.1, 5.3.1, 5.4.1, 5.5.1*
	102-12	External initiatives	*SR Section 4.4*
	102-13	Membership of associations	*SR Section 4.4*
Strategy	102-14	Statement from senior decision-maker	*SR Section 1*
Ethics and Integrity	102-16	Values, principles, standards, and norms of behaviour	*AR Page 13 (Code of Governance), SR Section 3.1, 3.3*
Governance	102-18	Governance structure	*AR Page 13 (Code of Governance), SR Section 3.2, 5.4, 5.4.1, 5.4.2, 5.4.3*
Stakeholder Engagement	102-40	List of stakeholder groups	*SR Section 5, 5.1, 5.2, 5.3, 5.4, 5.5*
	102-42	Identifying and selecting stakeholders	*SR Section 5*
	102-43	Approach to stakeholder engagement	*SR Section 5*
	102-44	Key topics and concerns raised	*SR Section 4.2, 5*
Reporting Practice	102-45	Entities included in the consolidated financial statements	*AR Page 66*
	102-46	Defining report content and topic boundaries	*SR Section 2.1, 2.2, 2.3*
	102-47	List of material topics	*SR Section 4.2*
	102-48	Restatements of information	*No Significant Changes*
	102-49	Changes in reporting	*No Significant Changes*
	102-50	Reporting period	*SR Section 2.1*
	102-51	Date of most recent report	*SR Section 2.1*

GRI Reference		Disclosure	Response
	102-52	Reporting cycle	*SR Section 2.1*
	102-53	Contact point for questions regarding the report	*SR Section 2.4*
	102-54	Claims of reporting in accordance with the GRI Standards	*SR Section 2.2*
	102-55	GRI content index	*SR Section 7*
	102-56	External assurance	*SR Section 2.2*
Economic			
Economic Performance	201-1	Direct economic value generated and distributed	*AR Page 35 to 100*
	201-2	Financial implications and other risks and opportunities due to climate change	*SR Section 5.1.4*
	201-3	Defined benefit plan obligations and other retirement plans	*SR Section 5.2.4.2*
	201-4	Financial assistance received from government	*AR page 79*
Market Presence	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	*Not disclosed*
	202-2	Proportion of senior management hired from the local community	*Not disclosed*
Indirect Economic Impacts	203-1	Infrastructure investments and services supported	*Not measured*
	203-2	Significant indirect economic impacts	*Not measured*
Procurement Practices	204-1	Proportion of spending on local suppliers	*Not disclosed*
Anti-corruption	205-1	Operations assessed for risks related to corruption	*SR Section 4.2*
	205-2	Communication and training about anti-corruption policies and procedures	*SR Section 3.3*
	205-3	Confirmed incidents of corruption and actions taken	*Management has confirmed no such incidents.*
Anti-competitive Behaviour	206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	*Management is not aware of any cases that is significant to the Group.*
Environment			
Materials	301-1	Materials used by weight or volume	*Not measured*
	301-2	Recycled input materials used	*Not measured*
	301-3	Reclaimed products and their packaging materials	*Not measured*
Energy	302-1	Energy consumption within the organization	*SR Section 5.1.2*
	302-2	Energy consumption outside of the organization	*Not measured*
	302-3	Energy intensity	*Not measured*
	302-4	Reduction of energy consumption	*SR Section 5.1.2, 6.1*
	302-5	Reductions in energy requirements of products and services	*Not measured*
Water	303-1	Water withdrawal by source	*Not measured*

GRI Reference		Disclosure	Response
	303-2	Water sources significantly affected by withdrawal of water	*Not measured*
	303-3	Water recycled and reused	*Not measured*
Biodiversity	304-2	Significant impacts of activities, products, and services on biodiversity	*Not measured*
Emissions	305-1	Direct (Scope 1) GHG emissions	*SR Section 5.1.2, 6.1*
	305-2	Energy indirect (Scope 2) GHG emissions	*SR Section 5.1.2, 6.1*
	305-3	Other indirect (Scope 3) GHG emissions	*SR Section 5.1.2, 6.1*
	305-4	GHG emissions intensity	*SR Section 5.1.2*
	305-5	Reduction of GHG emissions	*SR Section 5.1.2, 6.1*
Effluents and Waste	306-2	Waste by type and disposal method	*Not measured*
Environmental Compliance	307-1	Non-compliance with environmental laws and regulations	*Management is not aware of any cases that is significant to the Group.*
Supplier Environmental Assessment	308-1	New suppliers that were screened using environmental criteria	*SR Section 5.4.3, 6.6*
Social			
Employment	401-1	New employee hires and employee turnover	*SR Section 5.2.3*
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	*SR Section 5.2.4*
	401-3	Parental leave	*SR Section 5.2.1, 5.2.2.1, 5.2.4*
Labor/Management Relations	402-1	Minimum notice periods regarding operational changes	*SR Section 5.2.1, 5.2.2*
Occupational Health and Safety	403-1	Workers representation in formal joint management–worker health and safety committees	*SR Section 5.2.5*
	403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	*Not disclosed*
Training and Education	404-1	Average hours of training per year per employee	*SR Section 5.2.2.4, 6.4*
	404-2	Programs for upgrading employee skills and transition assistance programs	*SR Section 5.2.2.4, 6.4*
	404-3	Percentage of employees receiving regular performance and career development reviews	*SR Section 5.2.2.1, 5.2.2.4, 6.4*
Diversity and Equal Opportunity	405-1	Diversity of governance bodies and employees	*SR Section 5.2.3*
	405-2	Ratio of basic salary and remuneration of women to men	*Not disclosed*
Non-discrimination	406-1	Incidents of discrimination and corrective actions taken	*None noted*
Child Labour	408-1	Operations and suppliers at significant risk for incidents of child labor	*None noted*

GRI Reference		Disclosure	Response
Forced or Compulsory Labour	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	*None noted*
Rights of Indigenous Peoples	411-1	Incidents of violations involving rights of indigenous peoples	*None noted*
Human Rights Assessment	412-2	Employee training on human rights policies or procedures	*SR Section 5.2.2.1, 5.2.6*
Supplier Social Assessment	414-1	New suppliers that were screened using social criteria	*SR Section 5.4.1, 5.4.2, 5.4.3, 6.6*
Public Policy	415-1	Political contributions	*No political contributions were made in the period covered*
Customer Health and Safety	416-1	Assessment of the health and safety impacts of product and service categories	*SR Section 5.3.1, 5.3.3*
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	*None noted*
Marketing and Labelling	417-1	Requirements for product and service information and labelling	*Our product information and labelling are based on prevailing laws and industry practices.* *Information on product and service, refer to http://www.ktlgroup.com/*
	417-2	Incidents of non-compliance concerning product and service information and labelling	*None noted*
	417-3	Incidents of non-compliance concerning marketing communications	*None noted*
Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	*None noted*
Socioeconomic Compliance	419-1	Non-compliance with laws and regulations in the social and economic area	*None noted*