

STAMFORD TYRES

STAMFORD TYRES CORPORATION LIMITED

SUSTAINABILITY REPORT 2019

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FY2019 Sustainability Report – Stamford Tyres Corporation Limited

1. Board statement

We affirm our commitment to sustainability with the publication of our maiden sustainability report (“Report”) guided by the Global Reporting Initiative (“GRI”) Standards: Core option. For this Report, we provide insights into the way we do business, while highlighting our environmental, social, governance (“ESG”) factors and economic performance.

Whilst mindful of our profit-oriented objective, we are committed to strike a balance between growth, profit, governance, environment, the development of our people and well-being of our communities to secure the long term future of our Group. This commitment is reflected in our sustainable business strategy and the material ESG factors which are shown in this Report.

A sustainability policy (“SR Policy”) covering our sustainability strategies, reporting structure, materiality assessment and processes in identifying and monitoring material ESG factors has been established and serves as a point of reference in the conduct of our sustainability reporting. Under this SR Policy, we will continue to monitor, review and update our material ESG factors from time to time, taking into account the feedback that we receive from our engagement with our stakeholders, organisational and external developments.

2. Reporting framework

This Report has been prepared in accordance with the Global Reporting Initiative (“GRI”) Core option and published in pursuant to the Singapore Exchange Securities Trading Limited (“SGX-ST”) listing rules 711 (A) and 711 (B). We have chosen to report using GRI Standards: Core option as it is an internationally recognised reporting framework.

3. Reporting period and scope

This Report is applicable for our financial year from 1 May 2018 to 30 April 2019 (“FY2019”) and a copy of which can be found in our corporate website <http://www.stamfordtyres.com>. A sustainability report will be published annually in accordance with our SR Policy.

This Report covers the key operating entities within the Group which contributed approximately 94% (FY2018: 93%) of the Group’s total revenue for the reporting period.

4. Feedback

We welcome feedback from all stakeholders on this Report. You may send related questions, comments, suggestions or feedback to our investor relations email account: weisze@stamfordtyres.com or siti@stamfordtyres.com

5. Stakeholder engagement

Our efforts on sustainability are focused on creating sustainable value for our key stakeholders, which comprise communities, customers, employees, regulators, shareholders and suppliers. Key stakeholders are determined for each material factor identified, based on the extent of which they can affect or are affected by our operations.

We actively engage our key stakeholders through the following channels:

S/N	Key stakeholder	Engagement channel
1	Community	We focus on continuous community engagement through close monitoring of local developments through mass media and dialogues where practicable.
2	Customer	Customers, comprised mainly retailers or sub-distributors, are encouraged to provide their feedback and feedback obtained is reviewed and relevant follow-up actions are taken to better serve them. Regular meetings and communications are made with customers to ensure that the Group remains connected with the customers.
3	Employee	Senior management holds regular communication sessions with employees to obtain feedback and alignment of business goals across all levels of workforce. Such communication channels include emails and staff evaluation sessions where employees can pose questions in person.

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S/N	Key stakeholder	Engagement channel
4	Regulator	We participate in consultations and briefing organised by key regulatory bodies such as SGX-ST so as to furnish feedback on proposed regulatory changes that impact our business.
5	Shareholder	We convey timely, full and credible information to shareholders through announcements on SGXNET, our website (http://www.stamfordtyres.com), investor relations email account (weisze@stamfordtyres.com or siti@stamfordtyres.com), annual general meetings, annual reports, and other channels such as business publications and investors' relation events.
6	Supplier	We work closely with our suppliers to ensure smooth delivery of products. In general, new suppliers are screened in accordance with the Group's purchasing policies and existing suppliers are assessed by respective work teams based on specified criteria. Feedback is also provided by the procurement teams to suppliers to ensure standards of products or services delivered by suppliers.

Through the above channels, we seek to understand the views of key stakeholders, communicate effectively with them and respond to their concerns.

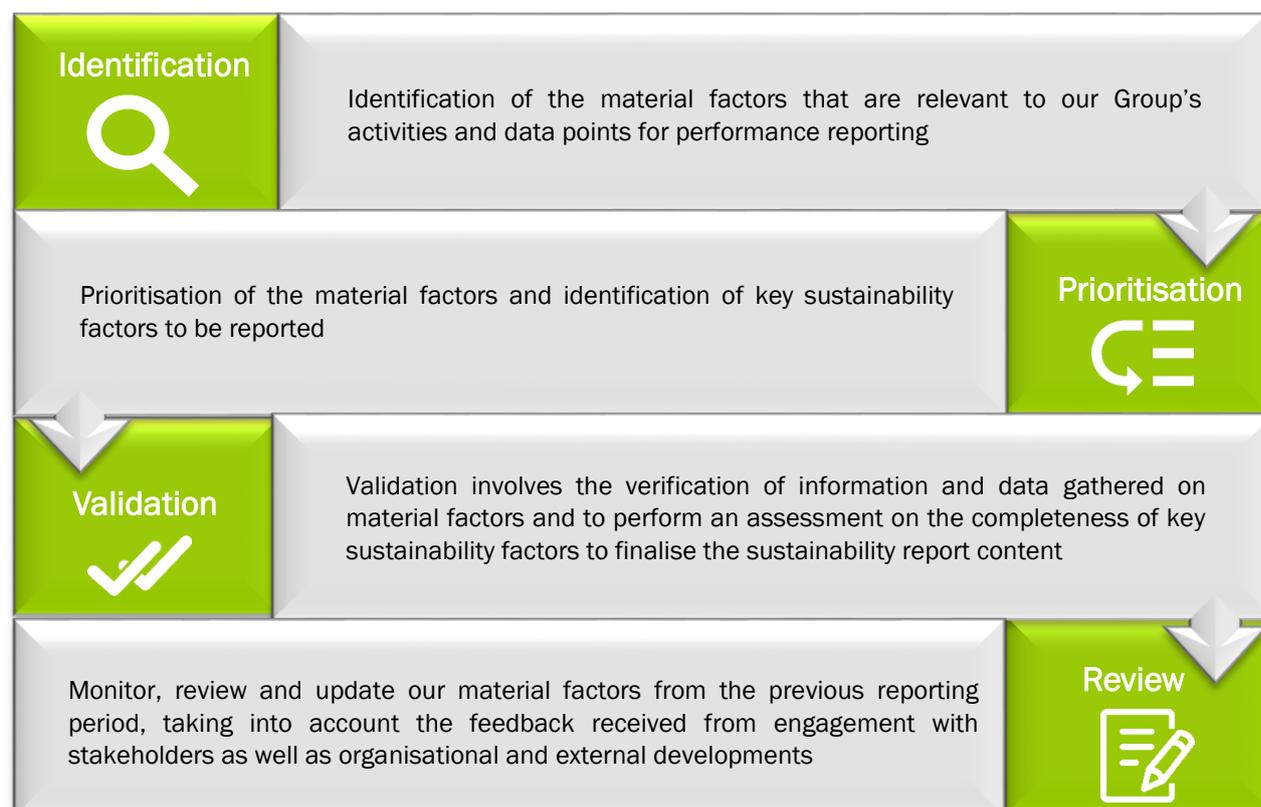
6. Policy, practice and performance reporting

6.1 Reporting structure

Our sustainability strategy is developed and directed by the senior management in consultation with the Board of Directors. The Group's Sustainability Committee, which includes senior management executives, is led by our Executive Director, and tasked to develop the sustainability strategy, review our material impacts, consider stakeholder priorities and set goals and targets, as well as collect, verify, monitor and report performance data for this Report.

6.2 Sustainability reporting processes

Under our SR policy, our sustainability process begins with the identification of relevant factors. Relevant factors are then prioritised as material factors which are then validated. The end result of this process is a list of material factors disclosed in this Report. Processes involved are as shown in the chart below:



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6.3 Materiality assessment

Under our SR Policy, each sustainability factor is assigned a reporting priority that determines the actions required as illustrated in the table below:

Reporting priority	Description	Criteria
I	High	Factors with high reporting priority are reported on in detail.
II	Medium	Factors with medium reporting priority are considered for inclusion in the Report. If it is decided that such factors are not material, they may be excluded from the Report.
III	Low	Factors with low reporting priority may be reported to fulfil regulatory or other reporting requirements. They are not included in this Report if not material.

The reporting priority is supported by a material factor matrix which considers the level of concern to external stakeholders and potential impact on business.

6.4 Performance tracking and reporting

We track the progress of our material sustainability factors by identifying the relevant data points (i.e. the information source of the relevant factor) and measuring them. In addition, performance targets that are aligned with our strategy are set to ensure that we maintain the right course in our path to sustainability. We seek to constantly enhance our performance-monitoring processes and data capture systems.

7 Material factors

Our materiality assessment performed for FY2019 involved the Group's Senior Management in identifying sustainability factors deemed material to our businesses and our stakeholders so as to allow us to channel our resources judiciously to create sustainable value for our stakeholders.

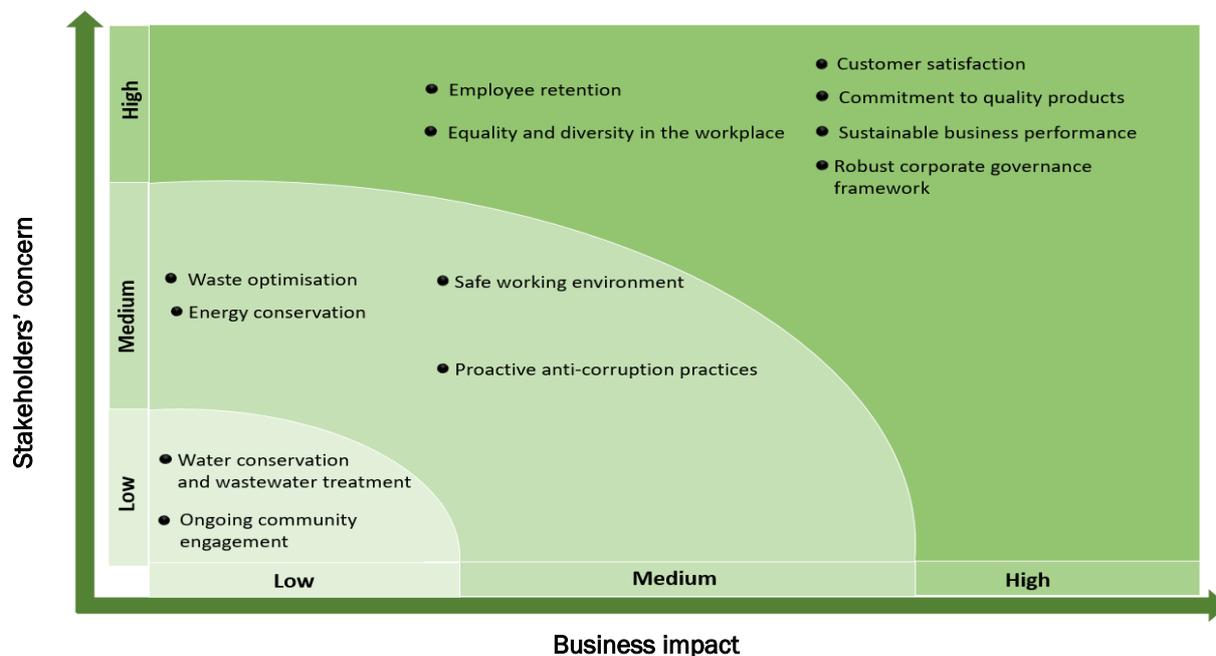
Presented below are a list of material sustainability factors and material factors matrix applicable to our Group:

List of material sustainability factors

S/N	Material factor	Reporting priority	Key stakeholder
General disclosure			
1	Customer satisfaction	I	Customer
Social			
2	Equality and diversity in the workplace	I	Employee
3	Employee retention	I	Employee
4	Safe working environment	II	Employee
5	Commitment to quality products	I	Customer, supplier
6	Ongoing community engagement	III	Community
Environmental			
7	Energy conservation	II	Community, shareholder
8	Water conservation and wastewater treatment	III	Community, shareholder, regulator
9	Waste optimisation	II	Community, shareholder, regulator
Economic			
10	Sustainable business performance	I	Shareholder
11	Proactive anti-corruption practices	II	Shareholder, regulator
Governance			
12	Robust corporate governance framework	I	Shareholder, regulator

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Material factors matrix



We will update the material factors on an annual basis to reflect changes in business operations, environment, stakeholder's feedback and sustainability trends. The details of each material sustainability factor are presented as follows:

7.1 Customer satisfaction

Our strategies towards customer satisfaction are as follows:

Cultivate a long term and sustainable relationship with our partners

With firm relationships established with our strategic partners, we are able to gain access to distribute a diverse range of products under the major brands of Falken, Dunlop, Continental and Toyo to meet our customers' needs and requirements. In addition, our volume purchases allow us to secure competitive pricing which we can then offer our customers with value-for-money products.

Adopt market standards for the quality and safety of our products

For products under our proprietary brands, they are manufactured by selected contracted manufacturers ("CMS") located in Asia under internationally recognised quality standards. The adoption of such standards supports our ability to consistently provide products that meet customers' needs and expectation.

For product safety and consistency in quality, refer to 7.5 for further details

Maintain presence and proximity to our customers

We have established an international distribution network that spans Singapore, Malaysia, Thailand, South Africa, Indonesia, Australia, India, Vietnam, Brunei, China and Hong Kong. Our extensive network brings us close to the markets we serve and more importantly, to our customers.

Nurture a team of highly trained and experienced employees

We are dependent on our highly trained and experienced professional staff to serve our customers on the products we distribute. Our strategy to establish a global footprint is driven by a core regional team of trained and experienced professional staff.

On our efforts to retain our valued staff, refer to section 7.2 for further details.

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7.2 Equality and diversity in the workplace

We are committed to the goals of diversity and equal opportunity in employment by providing a work environment for our employees that fosters fairness, equity and respect for social and cultural diversity, regardless of their gender, age and educational background. The total number of full-time employees within the Group as at 30 April 2019 is 934 (FY2018: 1,021).

Our Board



Our People



On gender diversity, we view diversity on the Board level as an essential element in supporting sustainable development with two (FY2018: two) female Board members. The percentage of female to total permanent employees is 26% (FY2018: 26%) and about 36% (FY2018: 34%) of managers are females as at 30 April 2019.

On age diversity, matured workers are valued for their experience knowledge and skills. As at 30 April 2019, 40% (FY2018: 35%) of our workforce is at least 40 years old.

On diversity in educational background, we seek to create an inclusive environment for our employees from different educational background. The distribution of staff by educational level is as follows:

Education qualification	FY2019	FY2018
Tertiary	35%	33%
Non-tertiary	65%	67%
Total	100%	100%

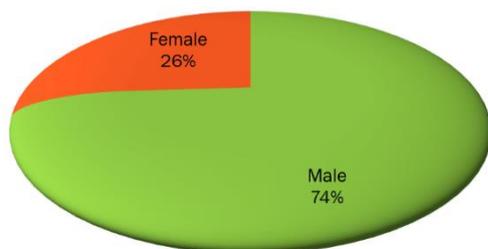
To promote equal opportunity, we have implemented various human resource measures as follows:

- Human resource policy and employee handbook are in place to recruit and promote employees based on merit and competency
- Staff assessment is performed regularly to evaluate the performance of staff and provides staff with sense of self-awareness to undertake training that will improve their skills and abilities
- Staff recruitment advertisements do not state age, race, gender or religion preferences as requirement
- We play an active role in helping our employees who are working parents. We provide our employees, in selected entities, with flexible work arrangements wherein employees are given greater scheduling freedom to accomplish their tasks and allow them to commit both work and family. In addition, we support our employees with breastfeeding responsibilities through providing them with a comfortable place to express breast milk.

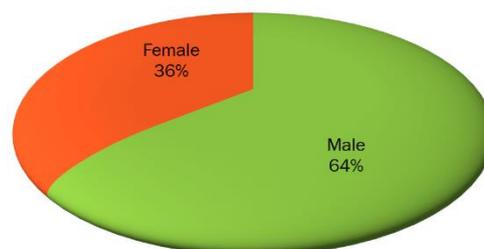
Breastfeeding corner in our Thailand wheel factory



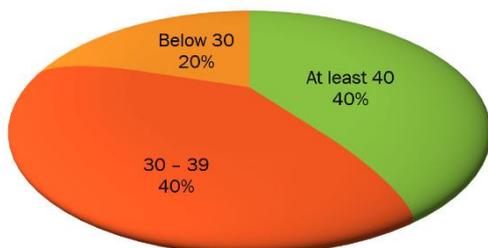
Gender diversity (all employees)



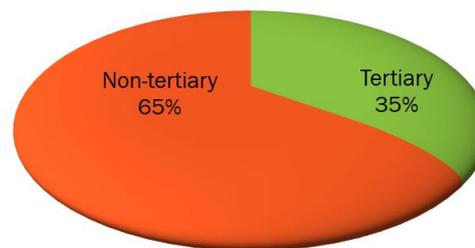
Gender diversity (managers)



Age diversity (all employees)



Educational diversity (all employees)



7.3 Employee retention

The continual success of our business relies on a team of professional, skilled and experienced staff and managers. We are committed to employee retention through the following efforts:

a. Performance based rewards

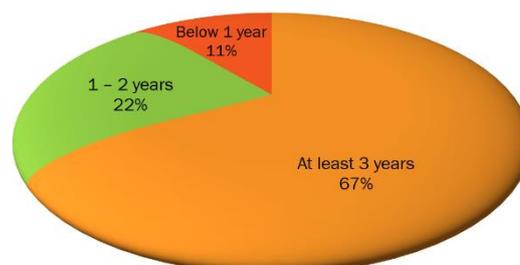
We recognise employees are key to sustainability and therefore aims to reward employees that are capable and dedicated. Under the Group’s performance share plan for managerial level employees, rewards in the form of shares are granted to key employees to align their interests with that of the Group. The share plan is subject to the review and approval by an independent Remuneration Committee and the Board of Directors.

b. Systematic internal human resource processes

Human resource processes related to employee retention includes:

- An employee handbook is in place to provide guidance on employee benefits and disseminate corporate culture
- Employees are engaged regularly via various channels such as the appraisal exercise which allows employees to gain feedback on their career progress
- In-house and external training courses are organised regularly for employees to improve their professional skills. For example, a systematic training program is in place in Thailand to equip sales staff with the needed product and service knowledge

Years of service (all employees)



We believe a low turnover improves the sustainability of operations and allows us to contribute positively to the development of social and human capital in a wider community. As at 30 April 2019, 67% (FY2018: 63%) of the employees have more than 3 years of service with us.

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7.4 Safe working environment

In our Group's daily operations, the workers are required to handle heavy lifting equipment such as forklift to transfer inventories. For the wheel factory in Thailand, workers also operate in a high temperature environment and use of chemicals such as paints. Given the nature of activities and operating environment, we are committed to maintain a safety-conscious culture amongst our employees.

The measures implemented to manage health and safety in the workplace environment are as follows:

- A set of safety rules and regulations is in place
- A safety committee is in place and safety inspections are performed regularly by safety officers and reported to senior managers
- All new employees are briefed on safety procedures during orientation
- Regularly track and monitor accidents at the workplace and corrective action plans are established to prevent recurrences of the accidents
- A dedicated first-aid room is maintained at the wheel factory in Thailand to provide immediate and effective medical treatment to workers or others who sustain injuries at the location

First-aid room in our Thailand wheel factory



The Group recorded zero workplace fatality during the reporting period and 12 (FY2018: 10) non-fatal workplace injuries¹. Although the incident rate increased marginally, the severity of accidents decreased significantly to 80 man-days lost (FY2018: 469 man-days) during the reporting period. The non-fatal workplace injuries mainly related to hand and leg injuries. We will continuously work towards reducing both the occurrence and severity of workplace accidents.

7.5 Commitment to quality products

Our brands



We are committed to deliver the best to our customers by providing them with quality and safe products for our long term business sustainability. Our proprietary brands comprise:

- Sumo Firenza and Sumo Tire brands for tyres which are produced by our CMS
- Stamford Sport Wheels, or SSW brand for alloy wheels which are designed, manufactured and tested in our wheel factory located in Thailand

The key measures on quality and safety are as follows:

a. Adoption of market standards on product quality and safety

To maintain product quality and safety, our suppliers and wheel factory are certified under internationally recognised quality standards with details as follows:

¹ A workplace accident is defined as one when an employee is injured in a work accident which resulted in (i) hospitalisation for at least 24 hours and/or (ii) medical leave of more than 3 days (regardless if the medical leave is consecutive)

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Production line	Brand	Key standards adopted	Certification Center
CMS	Sumo Firenza, Sumo Tire	ECE certification	TUV Rheinland, TUV SUD
Wheel factory	SSW	IATF 16949:2016	TUV Rheinland
		ISO 9001: 2015	Vehicle Inspection Association, Japan
		GOST	Euro-Asian Council & CIS for Standardization, Metrology and Certification
		ABE (KBA/TUV Germany)	TUV Rheinland Kraftfahrt GmbH

b. Robust quality control processes

To uphold a high standard on product quality and safety, we have implemented the following operational measures:

- A manufacturing management policy is in place for compliance with the production standards
- A procurement policy is in place to ensure procurement teams work closely with suppliers to comply with the Group's requirements
- Strategic suppliers are regularly evaluated through measures such as annual assessments, sampling tests and visits to suppliers' premises
- The production lines are supported by a team of experienced engineers and designers to provide quality assurance for the products

During the reporting period, there was no safety related defect which resulted in an accident that caused injury to a customer (FY2018: None).

7.6 Ongoing community engagement

We recognise that the long-term success of our business is closely related to the health and prosperity of the communities that we operate in. Accordingly, we strive to constantly contribute to the community. During the reporting period, various campaigns were initiated to help the community as follows:

Singapore Red Cross ("SRC")

Under an arrangement made with SRC, we have supported the servicing and change of tyres of 18 vehicles since August 2018. The vehicles typically make over 12,000 life-saving trips a year and are deployed all over Singapore. The estimated retail cost of savings for the SRC will be in the region of SGD 15,000 per year. We are proud to partake in the noble mission of SRC.



Photo courtesy: Singapore Red Cross

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7.7 Energy conservation

We are committed to responsible usage of energy to preserve the environment in which we operate in. Our operations consume energy mainly for the following purposes:

- Electricity for machineries used in the manufacturing of aluminium alloy wheels and equipment used in our offices
- Liquefied petroleum gas (“LPG”) for machineries used in the manufacturing of aluminium alloy wheels, specifically for wheel casting
- Fuel for operating motor vehicles such as trucks and forklifts

Key statistics on energy usage during the reporting period are as follows:

Energy	Unit of measurement	Energy consumption rate (Consumption/ Revenue)	
		FY2019 Unit/ SGD '000	FY2018 Unit/ SGD '000
Electricity	kWh	75.7	71.9
LPG ²	Kg	130.5	156.3
Fuel	litre	4.3	4.0

During the reporting period, our electricity and fuel consumption increased slightly whilst the decrease in LPG consumption was mainly due to higher sales in alloy wheels. We believe that responsible usage of energy resource results in lesser emissions and thus helps to preserve the environment. It also reduces our costs and enhances returns to shareholders. Key initiatives on this front are as follows:

- In April 2019, we entered into a Solar Power Purchase Agreement with Sembcorp Solar Singapore to install a solar photovoltaic system at our headquarters which is due to be completed by October 2019. Under this agreement, solar panels are installed on the rooftop of our headquarters to generate electricity which also help to bring down the roof surface’s temperature and cool the facility. Such an arrangement will generate clean energy and at the same time, reduce our utility cost
- A systematic maintenance program for operating equipment is in place to maintain energy efficiency
- Energy consumption is regularly tracked, analysed and corrective actions are taken when unusual consumption patterns are observed

7.8 Water conservation and wastewater treatment

We recognise the importance to effectively manage water consumption as valuable water resources may be depleted and pollution may occur if water consumption and wastewater treatment are not managed properly. To achieve effective water management, we are committed to minimise consumption and manage wastewater quality. This factor is primarily applicable to our wheel manufacturing operations located in Thailand with details as follows:



a. Water conservation

Process description	Unit of measurement	Energy consumption rate (Consumption/ Revenue)	
		FY2019 Unit/ SGD '000	FY2018 Unit/ SGD '000
Used in cooling and washing purposes such as in cooling towers, heat treatment quenching baths, casting hydraulic systems, machining coolant, painting pre-treatment and basic washing of wheels before applying paint.	Cu M	0.8	1.0

² LPG is consumed mainly by our wheel factory operations.

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Water conservation measures adopted by our wheel factory include the following:

- A systematic maintenance program is implemented for operating equipment to maintain water efficiency
- Water consumption trends are regularly tracked, analysed and corrective actions are taken when unusual consumption patterns are observed

b. Wastewater treatment

Wastewater comprised coolant oil and paint sludge generated from the manufacturing process as follows:

Description	Source
Coolant oil	Generated from the machining process, which is a mixture of oil, coolant chemical and water
Paint sludge	Generated from the painting process, which is a mixture of water, paint chemical, thinner, and other particles captured by the water curtains inside the painting booths

During the reporting period, the wheel factory generated 20,223 tonnes (FY2018: 15,635 tonnes) of wastewater. Measures taken to manage water quality include ensuring that wastewater is processed by our own water treatment plants before it is released into the waterways and conducting sampling checks to inspect water quality. During the reporting period, 100% (FY2018: 100%) of wastewater generated from our wheel factory was treated by our own water treatment plant.

7.9 Waste optimisation

We are committed to environmental preservation through reuse and recycling to allow the Group to operate in a sustainable environment.

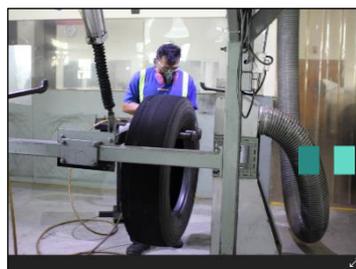
The main waste materials generated from our operations are the aluminium chips from wheel production. All aluminium chips from production are collected for outsource recycling. As at 30 April 2019, 89% (FY2018: 90%) of the aluminium chips generated from production was recycled.

Aluminium chips



In addition, we are actively involved in recycling of used tyres through our retreading plants located in Singapore, Malaysia and Indonesia. The retreading plants serve to extend the life span of tyres thus saving valuable natural resources used in the production of tyres. Whilst preserving the environment, we also ensure all retreaded tyres are rigorously inspected to ensure quality and safety.

Used tyres



Retreading process



Retreaded tyres



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7.10 Sustainable business performance

We believe in creating long-term economic value for shareholders by rewarding shareholders by way of consistent profits and dividend payments.

Details of the Group's economic performance can be found in the financial contents and audited financial statements of the Annual Report 2019. Our Annual Report 2019 is available as a downloadable PDF from our website at https://www.stamfordtyres.com/investor_ar.html

7.11 Proactive anti-corruption practices

We are committed to carry out business with integrity by avoiding corruption in any form, including bribery, and complying with the Prevention of Corruption Act of Singapore.

An employee handbook is in place to provide guidance to our employees on areas such as conduct in workplace, business conduct, confidentiality of information and conflict of interest.

We have implemented a whistle blowing policy to provide a mechanism for employees to raise concerns through accessible confidential disclosure channels about possible improprieties in matters of financial reporting and others. In FY2019, no serious offence³ was reported. (FY2018: None)

7.12 Robust corporate governance framework

We are committed to high standards of corporate governance and believes a high standard of corporate governance is integral in ensuring sustainability of our business as well as safeguarding shareholders' interests and maximising long-term shareholder's value.

Our overall Singapore Governance and Transparency Index ("SGTI") score assessed by National University of Singapore Business School was 62 for year 2019 (year 2018: 66).

The Board and Management firmly believe that the success of our quest for good governance lies in putting in place an effective framework of risk management and internal controls that is aligned with market standards and best practices. Refer to the Corporate Governance Report of the Annual Report 2019 for details for our corporate governance practices.

8. Target setting

For our material factors identified, we have set targets for FY2020 as follows:

S/N	Material factor	Target for FY2020
1	Customer satisfaction	Maintain or increase market presence
2	Equality and diversity in the workplace	Move towards a more balanced gender, age and educational diversity ratio
3	Employee retention	Improve employee retention rate
4	Safe working environment	Reduce the number of workplace accidents
5	Commitment to quality products	Maintain zero safety related defect which resulted in accident and caused injury to customer
6	Ongoing community engagement	Initiate various campaigns to help the communities
7	Energy conservation	Maintain or reduce energy consumption rate
8	Water conservation and wastewater treatment	Maintain or reduce water consumption rate and improve wastewater management
9	Waste optimisation	Optimise waste generated in operations
10	Sustainable business performance	Improve our financial performance subject to economic conditions whilst maintaining our dividend rate where practicable
11	Proactive anti-corruption practices	Maintain zero incident of serious offence
12	Robust corporate governance framework	Improve our SGTI score

³ A serious offence is defined as one that involves fraud or dishonesty amounting to not less than SGD 100,000 and punishable by imprisonment for a term of not less than 2 years which is being or has been committed against the company by officers or employees of the company.

9. GRI content index

General standard disclosure		Section reference	Page
Organisation profile			
102-1	Name of the organisation	Sustainability Report 2019 > Cover page	-
102-2	Activities, brands, products, and services	<ul style="list-style-type: none"> ▪ Annual Report 2019 (“AR 19”) > Corporate Information ▪ Annual Report 2019 > Our Products ▪ Sustainability Report 2019 > Customer Satisfaction 	<p>1 of AR 19</p> <p>13 of AR 19</p> <p>4</p>
102-3	Location of headquarters	<ul style="list-style-type: none"> ▪ Annual Report 2019 > Corporate Information ▪ Annual Report 2019 > Notes to the Financial Statements > Corporate Information 	<p>1 of AR 19</p> <p>56 of AR 19</p>
102-4	Location of operations	<ul style="list-style-type: none"> ▪ Annual Report 2019 > Our Presence ▪ Sustainability Report 2019 > Customer Satisfaction 	14 – 15 of AR 19 4
102-5	Ownership and legal form	<ul style="list-style-type: none"> ▪ Annual Report 2019 > Notes to the Financial Statements > Corporate Information ▪ Annual Report 2019 > Notes to the Financial Statements > Subsidiary, Associated and Joint Venture Companies ▪ Annual Report 2019 > Statistics of Shareholdings 	<p>56 of AR 19</p> <p>137 – 141 of AR 19</p> <p>144 of AR 19</p>
102-6	Markets served	<ul style="list-style-type: none"> ▪ Annual Report 2019 > Our Presence ▪ Sustainability Report 2019 > Customer Satisfaction 	14 – 15 of AR 19 4
102-7	Scale of the organisation	<ul style="list-style-type: none"> ▪ Annual Report 2019 > Our Products ▪ Annual Report 2019 > Financial and Operations Review ▪ Annual Report 2019 > Financial Highlights ▪ Annual Report 2019 > Consolidated Income Statement ▪ Annual Report 2019 > Consolidated Statement of Comprehensive Income ▪ Annual Report 2019 > Balance Sheets ▪ Sustainability Report 2019 > Material Factors > Equality and Diversity in the Workplace ▪ Sustainability Report 2019 > Material Factors > Sustainable Business Performance 	<p>13 of AR 19</p> <p>16 – 19 of AR 19</p> <p>20 of AR 19</p> <p>49 of AR 19</p> <p>50 of AR 19</p> <p>51 of AR 19</p> <p>5 – 6</p> <p>11</p>
102-8	Information on employees and other workers	Sustainability Report 2019 > Material Factors > Equality and Diversity in the Workplace	5 - 6
102-9	Supply chain	Annual Report 2019 > Corporate Information	1 of AR 19
102-10	Significant changes to the organisation and its supply chain	There was no significant change to the organisation and its supply chain during the reporting period	-
102-11	Precautionary Principle or approach	None	-
102-12	External initiatives	None	-
102-13	Membership of associations	None	-

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General standard disclosure		Section reference	Page
Strategy			
102-14	Statement from senior decision-maker	Sustainability Report 2019 > Board Statement	1
Ethics and integrity			
102-16	Values, principles, standards, and norms of behaviour	Annual Report 2019 > Corporate Governance	21 – 40 of AR 19
Governance			
102-18	Governance structure of the organisation	<ul style="list-style-type: none"> ▪ Annual Report 2019 > Corporate Governance ▪ Sustainability Report 2019 > Material Factors > Robust Corporate Governance Framework 	21 – 40 of AR 19 11
Stakeholder engagement			
102-40	List of stakeholder groups	Sustainability Report 2019 > Stakeholder Engagement	1 - 2
102-41	Collective bargaining agreements	None of our employees are covered by collective bargaining agreements	-
102-42	Identifying and selecting stakeholders	Sustainability Report 2019 > Stakeholder Engagement	1 - 2
102-43	Approach to stakeholder engagement	Sustainability Report 2019 > Stakeholder Engagement	1 - 2
102-44	Key topics and concerns raised	<ul style="list-style-type: none"> ▪ Sustainability Report 2019 > Stakeholder Engagement ▪ Sustainability Report 2019 > Material Factors ▪ Sustainability Report 2019 > Material Factors > Customer Satisfaction 	1 – 2 3 4
Reporting practice			
102-45	Entities included in the consolidated financial statements	Annual Report 2019 > Notes to the Financial Statements > Subsidiary, Associated and Joint Venture Companies	137 – 141 of AR 19
102-46	Defining report content and topic Boundaries	Sustainability Report 2019 > Sustainability Reporting Processes	2
102-47	List of material topics	Sustainability Report 2019 > Material Factors	3 - 4
102-48	Restatements of information	None	-
102-49	Changes in reporting	Sustainability factors added: <ul style="list-style-type: none"> ▪ Sustainability Report 2019 > Material Factors > Customer Satisfaction ▪ Sustainability Report 2019 > Material Factors > Ongoing Community Engagement 	4 8
102-50	Reporting period	Sustainability Report 2019 > Reporting Period and Scope	1
102-51	Date of most recent report	Sustainability Report 2018	-
102-52	Reporting cycle	Sustainability Report 2019 > Reporting Period and Scope	1
102-53	Contact point for questions regarding the report	Sustainability Report 2019 > Feedback	1
102-54	Claims of reporting in accordance with the GRI Standards and GRI content index	<ul style="list-style-type: none"> ▪ Sustainability Report 2019 > Reporting Framework ▪ Sustainability Report > GRI Content Index 	1 12 - 14
102-55	GRI content index	Sustainability Report 2019 > GRI Content Index	12 - 14
102-56	External assurance	We may seek external assurance in the future	-

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General standard disclosure		Section reference	Page
Management approach			
103-1	Explanation of the material topic and its Boundary	Sustainability Report 2019 > Material Factors	3
103-2	The management approach and its components	Sustainability Report 2019 > Material Factors	3 - 11
103-3	Evaluation of management approach	Sustainability Report 2019 > Material Factors	3 - 11
Category: Economic			
201-1	Direct economic value generated and distributed	<ul style="list-style-type: none"> ▪ Annual Report 2019 > Financial and Operations Review ▪ Annual Report 2019 > Financial Highlights ▪ Annual Report 2019 > Consolidated Income Statement ▪ Annual Report 2019 > Consolidated Statement of Comprehensive Income ▪ Annual Report 2019 > Balance Sheets ▪ Sustainability Report 2019 > Material Factors > Sustainable Business Performance 	16 – 19 of AR 19 20 of AR 19 49 of AR 19 50 of AR 19 51 of AR 19 11
205-3	Confirmed incidents of corruption and actions taken	<ul style="list-style-type: none"> ▪ Sustainability Report 2019 > Material Factors > Proactive Anti-Corruption Practices 	11
Category: Environmental			
302-3	Energy intensity	Sustainability Report 2019 > Material Factors > Energy Conservation	9
303-5	Water consumption	Sustainability Report 2019 > Material Factors > Water Conservation and Wastewater Treatment	9 -10
306-2	Waste by type and disposal method	Sustainability Report 2019 > Material Factors > Waste Optimisation	10
Category: Social			
401-1	New employee hires and employee turnover	Sustainability Report 2019 > Material Factors > Employee Retention	6
403-9	Work-related injuries	Sustainability Report 2019 > Material Factors > Safe Working Environment	7
405-1	Diversity of governance bodies and employees	Sustainability Report 2019 > Material Factors > Equality and Diversity in the Workplace	5 - 6
413-1	Operations with local community engagement, impact assessments, and development programs	Sustainability Report 2019 > Material Factors > Ongoing Community Engagement	8
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Sustainability Report 2019 > Material Factors > Commitment to Quality Products	7 - 8