



**SUSTAINABILITY REPORT
FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2019**

Co. Reg. No. 201531866K

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

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

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About this Sustainability Report

We are pleased to present the annual Sustainability Report of Secura Group Limited (the “Company” or “Secura”, and together with our subsidiaries, the “Group”), for our financial year ended 31 December 2019 (“FY2019”).

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

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

In defining our reporting content, we have referred to GRI’s principles for defining report content by considering the Group’s activities, impact and substantive expectations and interests of our stakeholders. We observed a total of 4 principles, including stakeholder inclusiveness, sustainability context, materiality and completeness. For reporting quality, we observed principles of balance, comparability, accuracy, timeliness, clarity and reliability.

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

In our continuous efforts to ensure and improve our sustainability journey, we welcome your views and feedback at info@securagroup.com.sg

Board Statement

The board of directors of the Company (the “Board”) and the management (the “Management”) presents our 2019 Sustainability Report and are pleased to update our continued efforts in developing sustainability in line with business objectives.

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

We have reviewed the key material ESG factors of importance to the Group and are satisfied that these material factors remain relevant. Hence we will continue with integrating these sustainability focuses in our business strategies and seek improvements moving forward.

Our Board and Management believe in the integration of technology applications into our business operations in the execution and provision of security services to all our customers. This will strengthen our pursuit of long-term sustainable growth for the Group, especially when we concurrently provide our staff with training, cross-job opportunities and skills upgrading. We have added more than 5 remote surveillance sites over the past year and will push for higher adoption rate in the coming year, with a dozen more sites in the horizon.

Our sustainability efforts are led by the Chief Executive Officer (“CEO”) and the Head of each business unit. The Board reviews and determines the relevance of the material ESG factors of the Group, oversees the management and monitoring of these factors and takes sustainability issues into consideration in the determination of the Group’s strategic direction and policies.

This is our third Sustainability Report and we have included comparative data with previous year’s report.

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

Organisation Profile

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

The Secura group of companies has been providing security printing services of value documents with anti-counterfeit features since 1976, and owns one of the largest cheque printing businesses in Singapore. With operations in Singapore, Bangladesh and Taiwan, its range of value documents include bank cheques and passbooks, cash vouchers, educational certificates, marriage certificates and machine-readable betting slips, amongst others.

The Soverus group of companies provides security services including security guarding, security systems integration, cybersecurity, homeland security and security consultancy services. As a premium security agency in Singapore, the group provides unarmed manned security guarding services, as well as operate a state-of-the-art 24-hour command centre with remote CCTV surveillance and video analytics for round-the-clock monitoring of premises.

The Group moved into the skills training arena in 2017, and incorporated Secura Training Academy Pte Ltd, which was certified as a Public Approved Training Organisation, and offer training modules for security and service tracks.

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

The Group is headquartered at 38 Alexandra Terrace, Singapore 119932 and operates from 2 other locations in Singapore – Pioneer Road North and Buroh Street factories for its printing operations. Through its security printing division, it also has associates operating in Taipei, Taiwan and Dhaka, Bangladesh.

As at the end of FY2019, the Group has 16 subsidiaries, joint ventures and associates, comprising 12 local entities employing a total of 818 (2018: 947) staff in Singapore. The fluctuation in staff force is in relation to business activities of its security guarding business.

The Group has a diversified customer base comprising more than 800 customers in various industries, including multinational corporations, financial institutions, government agencies and small and medium size enterprises.

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

Precautionary Principle

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

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

Our Mission and Core Values

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

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

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

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

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

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

Corporate Social Responsibility

The Group is committed to corporate social responsibility and subscribes to building strong and sustainable businesses that mutually benefit all stakeholders, in particular the well-being of our employees and our community at large. We involve our Management and staff in giving to the needy and support community funded meal programmes.

As one of the largest integrated security service providers employing more than 800 employees, we champion the welfare of our employees and encourage the active participation of our employees through volunteering and supporting worthy causes. Some staff are involved with food distribution to residents on approved welfare assisted schemes while others volunteer with providing home cooked meals for low income residents.

Commitment to our Bursary Programme

Since 2012, we have been awarding bursaries to the children of our employees, in particular our security officers on a bi-annual basis. To date, we have given out bursaries amounting to over S\$182,000 benefiting students from primary to tertiary levels. In 2019, we gave out bursaries to children of 115 security officers.

Supporting our Staff

We provide insurance coverage and extend various telecommunications, medical and dental benefits to all our staff. We also encourage our security officers to become members of National Trade Union

Congress (NTUC) and provide for their subscription fees. This will provide the extended insurance coverage in the event of any mishap.

Contributing to the NTUC U Care Fund

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

Donation of Used Laptops

In support of children from low income families, we have donated more than 10 units of functional used laptops through family service centres and co-operatives. This initiative resonates with the championing of educating the young people, the future of our society.

Contributing to "The Hut" Drive

We collaborated with "The Hut", set up by the Institute of Mental Health (IMH) Case Management Unit to better engage persons with mental health issues and their caregivers on an informal basis, and our staff donated good condition clothes, bags and shoes for the rehab patients and also caregivers.

Sponsorship for National Day Parade Tickets

2019 marks the 20th year that the Company has sponsored for the printing of tickets for National Day Parade and all preview and rehearsals. We are proud corporate citizens and are mindful of giving strong support to our nation.

Sponsorship of Top Student Prizes for University of Glasgow

As endorsement of our support for distinction, we sponsored cash prizes for Top Project Prize and Top Student Awards for the 2019 graduating students on joint program from University of Glasgow and Republic Polytechnic.

Subscription to Work Learn Technical Diploma (WLTD) programme

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

Approach to Sustainability

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

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

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

Our Stakeholders

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

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

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

Material Economic, Environmental, Social and Governance Factors

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

A) Economic Performance

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

2019 was a year of challenge for the Group as its major business segments in guarding and printing witnessed decline and its associate, Custodio Technologies continued to be loss making. We assessed our investment and took the decision to impair the goodwill on acquisition of Custodio Technologies which resulted in a steep loss for the Group. For the guarding segment, instead of laying-off the officers, we took the opportunity to streamline our work patterns to better align ourselves to work within the Ministry of Manpower ("MOM") tightened approved working hours. We continue to develop systems which will aid in monitoring the work activities and ensure there is work-life balance for our staff while extending quality service to our clients.

We expanded on adoption of technology and innovation, adding physical security information management system to our infrastructure. We successfully secured 5 more remote surveillance sites which came with reduction of manpower requirements. We are on track to add more remote surveillance sites in the next financial year. We expect to yield increased margins from wider application of technology.

For more details, please refer to the Company's annual report for FY2019 ("Annual Report FY2019").

B) Governance

The Board is committed to achieving and maintaining high standards of corporate governance in order to safeguard the interests of shareholders of the Company. Please refer to the Corporate Governance Report set out in our Annual Report FY2019 for further details.

The Board and Management will continue to ensure that we uphold the highest level of conduct and ethical standards. To that end, we have established policies and practices in line with internal controls objectives in areas such as conflicts of interests, whistle blowing and fraud, and insider trading.

a. Conflicts of Interests Policy

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

b. Insider Trading Policy

The Group adopts a "Code of Best Practices on Securities Transactions by Officers of the Company". Officers are reminded not to trade in the Company's shares directly or indirectly

during the “black-out” periods prior to the announcement of the half-year and full year financial results and/or when they come into possession of information not yet made available to the general public.

c. Fraud and Whistleblowing Policy

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

d. Data Privacy

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

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

As a service provider to the financial industry, our printing segment has been examined for its suitability of the design and operating effectiveness of controls to meet the control objectives set forth in the Association of Banks in Singapore’s (“ABS”) “ABS Guidelines on Control Objectives & Procedures for Outsourced Service Providers” since Year 2016. The audit review for 2019 was conducted by RSM Chio Lim LLP (2018: by Ernst & Young Advisory Pte Ltd) and there have been no substantiated complaints or any breaches or loss of customer data in FY2019 (2018: Nil). We expect to maintain the same standard of operating effectiveness of controls for the financial year ending 31 December 2020 (“FY2020”).

As for our other business segments, we appointed a Chief Data Protection Officer to implement and manage compliance matters with the main objective of ensuring the data of visitors to our protected sites and trainees’ data records for our training division are adequately secured. We also enrolled key staffs in each department for training courses in PDPA to reinforce the discipline of observing privacy.

Our security policies and procedures are disseminated to all employees with security awareness training conducted annually. Managers are in constant engagement with staff to ensure that the Group’s PDPA policy is adhered to and practiced. Similar to the previous year, for FY2019, the Group has not received any complaints concerning breaches of customer privacy and there were no identified leaks, thefts or losses of customer data. We will work towards no complaints concerning breaches of customer privacy, identified leaks, thefts or losses of customer data for FY2020.

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

Regulatory Compliance

To the best of our knowledge, the Group has not identified any incidence of non-compliance with laws and regulations in its activities relating to social and economic areas during FY2019 and for the financial year ended 31 December 2018 (“FY2018”). We will remain vigilant in observing laws and regulations at all times and ensure there is no incident of non-compliance in activities relating to social and economic areas for FY2020.

C) Environment

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

Through our annual Quality Management System audits, we constantly monitor material waste against consumption and have achieved less than 0.5% tolerance (target set at not more than 1.5%) for additional waste materials used for FY2019 (2018: 0.5%). All our paper material wastes are collected by OSPAR (Outsourced Service Provider Audit Report) approved recycling vendors for further processing for recycled pulp. OSPAR is a report that complies with the ABS Guidelines on Control Objectives & Procedures for Outsourced Service Providers. We strive to achieve the low rate of material waste for FY2020.

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

D) Social

Our guarding and printing businesses employ more than 700 staffs who are considered low-wage workers in their respective sector. We support our national Tripartite Committee's effort in the adoption of the Progressive Wage Model (PWM) to increase wages of workers through skills upgrading and improved productivity. Typical of the national workers' profile for this segment, we are also champions in the employment of senior workers beyond the re-employment age of 67.

Our printing division has also supported the re-employment of workers beyond 62. As at the end of FY2019, we have 8 staff (2018: 8) who have been employed with the Group for more than 40 years with the most senior staff just under 70 years old.

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

Employment

The Group hires employees from diverse backgrounds across its spectrum of businesses. We have established policies and practices as laid down in collective agreements and our corporate handbook to ensure transparency and fairness for staff. The benefits for full-time employees including government regulated leave and workplace insurance policies are also set out in these collective agreements. As at the end of FY2019, approximately 32% (2018: 30%) of our employees are union members.

Our employee profile is largely based on our security guarding and security printing businesses. Due to the nature of these businesses, our employees are predominantly male. As at the end of FY2019, we had a total of 818 local employees comprising 620 male staff and 198 female staff in the ratio of 76:24 (2018: 81:19). The comparative figures are further detailed in the table below. We do not experience any significant seasonal variations in our employee profile. The Group does not outsource our business activities.

	FY2019			FY2018		
	Male	Female	Total	Male	Female	Total
Number of Permanent Employees	412	167	579	397	114	511
Number of Temporary Employees	208	31	239	371	65	436
Total Employees	620	198	818	768	179	947

In attestation of our support of the Tripartite Guidelines on the Re-employment of Older Employees, we have in our employment 113 staff or 14% of the work force who are above the retirement age as at the end of FY2019 (2018: 99 staff or 11%).

a. Occupational Health and Safety

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

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

The Group is committed to an integrated approach to managing safety, health and well-being in the workplace. Every employee is expected to observe safety policies and practices, use the safety equipment supplied to them and practice safety at all times. We provide attire suitable for the work environment – uniforms and safety shoes, ear plugs and goggles, caps and coats for outdoor workers against weather elements. All staff undergo job-related training before being deployed on the job to ensure health and safety concerns are adequately addressed. Moving forward, we will also provide safe environment guidelines for the workplace incorporating Covid-19 measures.

Due to the nature of our operations, safety training courses or programmes for our employees are also important. Employees are regularly sent for on-the-job training and safety induction courses conducted by the respective supervisors in different departments to ensure that our

employees are apprised of the most up-to-date safety measures and policies so as to minimise safety breaches.

Our Safety Committee, our Operations Managers and working committee formed by representatives from all departments conducts meetings on a quarterly basis to raise issues on work environment and address non-compliance. The information is then disseminated to reinforce safety awareness and introduce/reinforce appropriate actions where necessary.

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

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

Against all precautionary and guided measures for workplace safety, we have had no major incidents in FY2019 as well as FY2018. We will work towards zero incident targets for FY2020.

b. Training

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

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

In FY2019, our annual training hours total 8,059 hours (2018: 11,411 hours) for operational staff and 502 hours (2018: 464 hours) for executive staff. The reduced training hours in FY2019 was due to our aggressive training regime in FY2018 for our officers to be trained in the “Recognize Terrorist Threats” module which has since become the basic module for individuals to qualify for security guarding licensing.

The training programs include the following modules:

- a) Recognize Terrorist Threats
- b) Handle Security Incidents & Services
- c) Provide Guard and Patrol Services
- d) Basic First Aid CPR AED Course
- e) Conduct Crowd and Traffic Control
- f) Conduct Operation Briefing and Debriefing
- g) Conduct Security Screening of Person and Bag
- h) Conduct Security Screening Using X-ray Machine
- i) Contribute to the Management of Security Incidents
- j) Induct Security Personnel
- k) Manage Disorderly Conduct and Threatening Behavior
- l) Manage Security Agency Within Legal Framework
- m) Monitor and Review Security Operations
- n) Operate Basic Security Equipment
- o) Perform Security Duties at Protected Areas and Protected Places
- p) Perform Supervisory Duties within Legal Framework
- q) Respond to Fire Emergency in Buildings
- r) Respond to Fire Incident in Workplace
- s) Supervise Security Officers
- t) Fundamentals of the Personal Data Protection Act
- u) Provide Go-The-Extra-Mile Service
- v) Threat Vulnerability Risk Assessment Course
- w) Workshop on Employment Act and Its Practical Applications

Average training hours undertaken during FY2019	Male	Female	Overall	Function
Managers	35	29	34	Technical
Executives	18	19	19	Technical
Staff	27	18	24	Operational
Overall	27	18	24	

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

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

GLOBAL REPORTING INITIATIVE (GRI) CONTENT INDEX

GRI Standard	Disclosure	Page Reference/ Description
GENERAL DISCLOSURE		
GRI 102: General Disclosures 2016	Organisational Profile	
	102-1 Name of the organisation	Sustainability Report (SR): page 1
	102-2 Activities, brands, products, and services	SR: Organisational Profile, page 5 Annual Report FY2019 (AR): Corporate profile, page 1; Message to Shareholders, pages 2-4
	102-3 Location of headquarters	SR: Organisational Profile, page 5
	102-4 Location of operations	SR: Organisational Profile, page 5
	102-5 Ownership and legal form	SR: Organisational Profile, page 5 AR: Statistics of Shareholding, pages 116-117
	102-6 Markets served	SR: Organisational Profile, page 5
	102-7 Scale of the organisation	SR: Organisational Profile, page 5 AR: Operations & Financial Review, pages 5-7
	102-8 Information on employees and other workers	SR: Employment, page 13
	102-9 Supply chain	SR: Organisational Profile, page 5
	102-10 Significant changes to the organisation and its supply chain	AR: Message to Shareholders, pages 2-4
	102-11 Precautionary principle or approach	SR: Precautionary Principle, page 5
	102-12 External initiatives	SR: Corporate Social Responsibility, pages 6-7
	102-13 Membership of associations	SR: Organisational Profile, page 5
	Strategy	
	102-14 Statement from senior decision-maker	SR: Board Statement, page 4 AR: Message to Shareholders, pages 2-4
	Ethics and Integrity	
	102-16 Values, principles, standards, and norms of behaviour	SR: Our Mission and Core Values, page 6
	Governance	
	102-18 Governance structure	AR: Corporate Governance Report, pages 18-36 SR: Material Economic, Environmental, Social and Governance Factors, page 10
	Stakeholder Engagement	
	102-40 List of stakeholder groups	SR: Our Stakeholders, page 9
102-41 Collective bargaining agreements	SR: Employment, page 13	
102-42 Identifying and selecting stakeholders	SR: Our Stakeholders, page 9	
102-43 Approach to stakeholder engagement	SR: Our Stakeholders, page 9	
102-44 Key topics and concerns raised	SR: Our Stakeholders, page 9	

GRI Standard	Disclosure	Page Reference/ Description
GENERAL DISCLOSURE		
	Reporting Practice	
	102-45 Entities included in the consolidated financial statements	AR: Notes to the Financial Statements, pages 80-82
	102-46 Defining report content and topic boundaries	SR: About this Sustainability Report, page 3 SR: Material Economic, Environmental, Social and Governance Factors, page 10
	102-47 List of material topics	SR: Material Economic, Environmental, Social and Governance Factors, pages 10-12
	102-48 Restatements of information	There were no restatements of information given in the FY2018 Sustainability Report
	102-49 Changes in reporting	There were no changes in the list of material topics and topic boundaries from the FY2018 Sustainability Report
	102-50 Reporting period	SR: About this Sustainability Report, page 3
	102-51 Date of most recent report	The Sustainability Report in respect of FY2018 was published on 24 May 2019
	102-52 Reporting cycle	SR: About this Sustainability Report, page 3
	102-53 Contact point for questions regarding the report	SR: About this Sustainability Report, page 3
	102-54 Claims of reporting in accordance with the GRI Standards	SR: About this Sustainability Report, page 3. The Sustainability Report is prepared with reference to the GRI.
	102-55 GRI content index	SR: GRI Content Index, pages 16-18
	102-56 External assurance	SR: GRI Content Index, pages 16-18
MATERIAL TOPICS		
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GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	SR: Economic Performance, page 10
	103-2 The management approach and its components	SR: Economic Performance, page 10 AR: Message to Shareholders, pages 2-4
	103-3 Evaluation of the management approach	SR: Economic Performance, page 10 AR: Message to Shareholders, pages 2-4
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	SR: Economic Performance, page 10 AR: Operations & Financial Review, pages 5-7
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GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	SR: Occupational Health and Safety, pages 13-14
	103-2 The management approach and its components	SR: Occupational Health and Safety, pages 13-14
	103-3 Evaluation of the management approach	SR: Occupational Health and Safety, pages 13-14

GRI Standard	Disclosure	Page Reference/ Description
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GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	SR: Training, pages 14-15
	103-2 The management approach and its components	SR: Training, pages 14-15
	103-3 Evaluation of the management approach	SR: Training, pages 14-15
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	SR: Training, pages 14-15
	404-2 Programs for upgrading employee skills and transition assistance programs	SR: Training, pages 14-15 Social, page 12
	404-3 Percentage of employees receiving regular performance and career development reviews	SR: Training, pages 14-15
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GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	SR: Data Privacy, page 11
	103-2 The management approach and its components	SR: Data Privacy, page 11
	103-3 Evaluation of the management approach	SR: Data Privacy, page 11
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	SR: Data Privacy, page 11
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GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	SR: Governance, pages 10-11
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