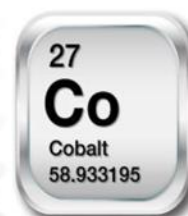
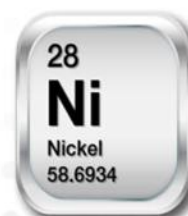


# SHAPING THE FUTURE

Sustainability Report 2020



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This sustainability report has been prepared by Silkroad Nickel Ltd. (the “**Company**”) and its contents have been reviewed by the Company’s sponsor, ZICO Capital Pte. Ltd. (“**Sponsor**”), in accordance with Rule 226(2)(b) of the Singapore Exchange Securities Trading Limited (“**SGX-ST**”) Listing Manual Section B: Rules of Catalyst.

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

The contact person for the Sponsor is Ms. Alice Ng, Director of Continuing Sponsorship, ZICO Capital Pte. Ltd. at 8 Robinson Road, #09-00 ASO Building, Singapore 048544, telephone (65) 6636 4201.

# 1 CORPORATE PROFILE

Silkroad Nickel Ltd. (“**Silkroad Nickel**” or the “**Company**”, and together with its subsidiaries, the “**Group**”) is the first and only pure nickel company listed on the Singapore Exchange (“**SGX**”). The Company made its trading debut on the Catalist board of the SGX on 30 July 2018, under the stock code - STP. Since inception, the Company’s vision is to expand downstream and transform itself into a vertically integrated producer of Nickel products such as Nickel Pig Iron/Ferronickel (“**NPI/FeNi**”) for the Stainless Steel industry and to produce various nickel-related products utilized in Electric Vehicle (“**EV**”) battery cathode components.

Through its wholly-owned subsidiary, PT Teknik Alum Services (“**PT TAS**”), the Company owns and carries out its nickel ore mining operations at an approximately 1,301 hectares mining concession area in the Morowali Regency, Central Sulawesi, Indonesia. The Group currently conducts its mining activities using an open pit mining method, which includes the exploration, planning, transportation and stockpiling, delivery and barging, as well as reclamation and rehabilitation works throughout the mine’s lifetime. The Group engages third party mining contractors such as Jo Sinohydro-Sepco II Indo, a subsidiary of PowerChina, to undertake the necessary mining and production activities.

The Company has also begun to originate and develop several downstream initiatives by entering into definitive agreements to build and operate a blast furnace plant and a Rotary-Kiln Electric Furnace (“**RKEF**”) to produce NPI, which is vital for manufacturing stainless steel. In addition, the mine’s laterite ore comprising nickel and cobalt are key components used in lithium-ion batteries. The Company is engaged in discussions to develop partnerships and initiatives in the EV industry.

These plans to develop and grow the Group’s downstream NPI and EV initiatives will transition Silkroad Nickel from its primary nickel mining operations to a fully-integrated nickel producer. This will allow Silkroad Nickel to change its current business model from operating as a relatively small-scale mining operator in an environment of high capital expenditure and relatively low operational efficiency, to being a low-cost nickel producer with high-quality nickel mining assets.

## 2 BOARD STATEMENT

### BOARD STATEMENT

We are pleased to present the second annual Sustainability Report of Silkroad Nickel Ltd. for the financial year from 1 January 2020 to 31 December 2020 (“**FY2020**”).

The key material economic, environmental, social and governance (“**EESG**”) factors for the Group have been identified and reviewed by Mr. Eddy Pratomo (Independent Chairman) and Mr. Hong Kah Ing (Executive Director and Chief Executive Officer of the Company). The board of directors of the Company (“**Board**”) oversees the management and monitoring of these factors and takes them into consideration in the determination of the Group’s strategic direction and policies. Sustainability is a part of the Company’s wider strategy to create long-term value for all its stakeholders.

FY2020 will always be one of the most challenging years that we have faced, forever etched in our memory due to the ongoing Novel Coronavirus (“**COVID-19**”) pandemic. The pandemic has led to a significant slowdown in global economic activities, and has severely impacted many countries due to restricted travel, closed borders, and a standstill in commerce around the globe. Indonesia was not spared and remains severely affected, with the Indonesian government trying their best to contain the spread of COVID-19.

It is therefore imperative for businesses to adapt quickly to key stakeholders’ concerns, closing any potential gaps and capitalising on opportunities amid today’s rapidly changing business environment.

The EESG data and information provided have been derived from internal data monitoring and verification to ensure accuracy.

### REPORTING FRAMEWORK

In defining our reporting content, we applied the Global Reporting Initiative (“**GRI**”)’s principles by considering the Group’s activities, impact and substantive expectations and interests of its stakeholders. We observed a total of four principles, namely materiality, stakeholder inclusiveness, sustainability index and completeness. For reporting quality, we observed the principles of balance, comparability, accuracy, timeliness, clarity and reliability.

Silkroad Nickel has chosen the GRI framework as it is the most established international sustainability reporting standard and in respect of the extent to which such framework is applied, this report has been prepared in reference to the GRI Standards reporting guidelines, at Core level. No external assurance has been sought for this report.

This report is set out on a “comply or explain” basis in accordance with Rule 711B and Practice Note 7F on Sustainability Reporting Guide of the Singapore Exchange Securities Trading Limited Listing Manual Section B: Rules of Catalist (“**Catalist Rules**”). Corresponding to GRI’s emphasis on materiality, this report highlights the key EESG related initiatives carried out throughout the 12-month period of FY2020.

This report excludes our downstream venture to operate smelter facilities for the production of nickel pig iron on the mine site in Sulawesi, Indonesia, which we had entered into a binding definitive head of agreement on 4 December 2019.

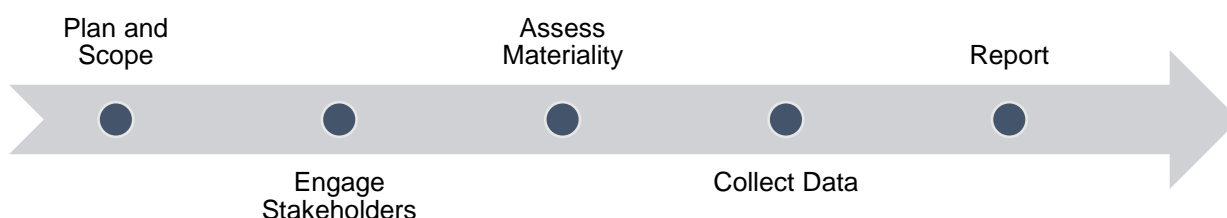
## **FEEDBACK**

We welcome feedback from our stakeholders with regards to our sustainability efforts as this enables us to consistently improve our policies, systems and results. Please send your comments and suggestions to [enquiries@silkroadnickel.com](mailto:enquiries@silkroadnickel.com).

28 May 2021

# 3 SUSTAINABILITY APPROACH

## OUR SUSTAINABILITY METHODOLOGY



## STAKEHOLDERS ENGAGEMENT

An important starting point in our sustainability journey is to identify our stakeholders and material EESG factors relevant to our business. The interests and requirements of key stakeholders are also taken into account when formulating corporate strategies. These key stakeholders include, but are not limited to, suppliers, shareholders, customers, employees, government and regulators, the Board, bankers and community. We adopt both formal and informal channels of communication to understand the needs of key stakeholders, and incorporate these into our corporate strategies to achieve mutually beneficial relationships.

Key Stakeholders	Engagement Platforms	Frequency of Engagement	Key Concerns Raised
<b>Suppliers</b>	Meetings (via face-to-face or online)	Monthly	Prompt payment, accurate specifications, selection of reliable suppliers
	Vendor Assessment	Annually	Delivery performance and quality performance
<b>Shareholders</b>	Annual General Meetings	Annually	Financial and operational performance of the Group, corporate governance and sustainability practices, business strategies of the Group
	Extraordinary General Meetings	As and when applicable	
	Annual Report	Annually	
	Announcements	As and when applicable	
	Roadshows	As and when applicable	
<b>Customers</b>	Meetings (via face-to-face or online)	Monthly	Quality of services, on-time delivery, product quality level
	Open House	Quarterly	
<b>Employees</b>	Staff Appraisal	Annually	Employee compensation and benefits, personal development
	Townhall Sessions	Quarterly	
	Monthly Birthday Celebrations	Monthly	
	Staff Bonding Sessions	Annually	
<b>Government and Regulators</b>	Regulatory Reporting	As and when applicable	Timely reporting Full compliance with all law, rules and regulations
	Inspections	Annually	
	E-mails / Circulars	Quarterly	
	Surveys	Quarterly	

Key Stakeholders	Engagement Platforms	Frequency of Engagement	Key Concerns Raised
<b>Board</b>	Board Meetings	Quarterly	Financial performance, policies and strategies and annual budgets of the Group
	Board Papers	Quarterly	
	Board Lunches	Quarterly	
<b>Bankers</b>	Meetings (via face-to-face or online)	Monthly	Project financing, working capital financing
	Lunches	Monthly	
<b>Community</b>	Sponsorship	Annually	Corporate Social Responsibility (CSR) contribution Donation to local villagers
	Donations	Monthly	

## MATERIALITY ASSESSMENT

Our sustainability process begins with the identification of relevant EESG factors. Relevant EESG factors are then prioritised to identify material EESG factors which are subject to validation. The end result of this process is a list of material EESG factors disclosed in this report. Our sustainability process, as detailed above, is as shown below:



The Group had conducted a materiality assessment for its inaugural Sustainability Report FY2019. For the Group's Sustainability Report FY2020, a materiality review, which incorporated inputs gathered from stakeholders' engagements, was conducted to ensure the relevance and materiality of the EESG factors identified. We engaged our employees from different departments, seeking our internal stakeholders' feedback for prioritisation of these topics. Going forward, a continued materiality review will be conducted every year, incorporating inputs gathered from stakeholders' engagements.

In order to determine if an EESG factor is material, we assessed its potential impact on the economy, environment and society and its influence on the stakeholders. Applying the guidance from GRI, we have identified the following as our material EESG factors:





## 4 ECONOMIC

### ECONOMIC PERFORMANCE

FY2020 has been a challenging year for Silkroad Nickel due to challenges such as the global COVID-19 pandemic, which created economic uncertainties and dampened business activities. Closer to home, the Indonesian government's ban on nickel ore exports also took effect on 1 January 2020 which impacted the Group's upstream mining business. Due to these unfavourable market conditions, the Group recorded weaker financial results and had an unprofitable year for FY2020.

For more details on the financial results of the Group for FY2020, please refer to the following sections of the Company's annual report for FY2020:

- Financial & Operations Review, pages 4 to 5; and
- Financial Statements, pages 41 to 90.

### ANTI-CORRUPTION

Silkroad Nickel does not tolerate corruption in any form. Our Group is guided by our anti-corruption policy. The management of Silkroad Nickel ("**Management**") emphasized to our staff that the Group has zero tolerance with corruption and that stern actions will be taken if anyone is involved in any corruption. Any report of corruption will be escalated to the attention of the Chairman of the Audit and Risk Committee of the Company ("**AC**"). We prohibit corruption in all forms, including extortion and bribery.

Silkroad Nickel has in place a whistle-blowing framework where staff of Silkroad Nickel can raise concerns about improprieties in matters of financial reporting or other matters through normal channels to the dedicated officers of Silkroad Nickel or to the AC via email or letter. In FY2020, there were no reports received through the whistle-blowing mechanism established by Silkroad Nickel. We have achieved the target we set last year. We are not aware of any incident of corruption in FY2020 (FY2019: NIL).

#### **Target for FY2021**

The Group aims to continue to maintain zero incident of corruption.

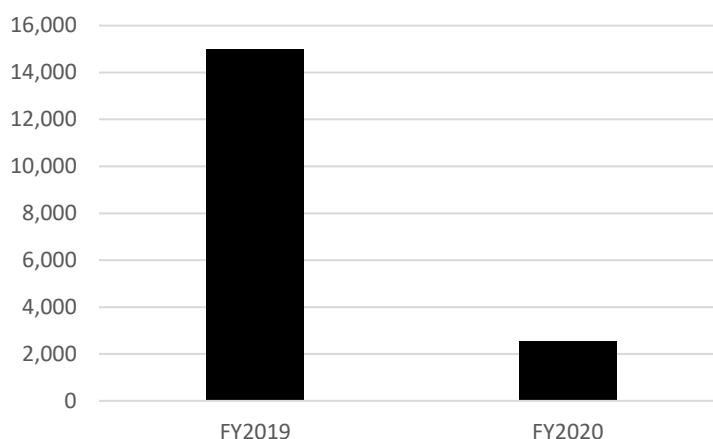
## 5 ENVIRONMENTAL

### ENERGY

Energy consumption is inevitable in the daily operations of a mining company. At our mining site, diesel is used for our excavators and dump trucks. Our average monthly diesel consumption in FY2020 was approximately 2,552 liters, as compared to 15,000 liters in FY2019. Lower operation levels in FY2020 as a result of the COVID-19 pandemic had contributed to the significant decline in our diesel consumption.

We have achieved the target we set last year and recorded no harmful emissions nor spill in our operations in FY2020.

**Average Monthly Diesel Consumption  
(liters)**



#### Target for FY2021

We will actively review our energy consumption levels to gain an insight into how the average fuel consumption intensity level for our mining operation can be further improved. We will also proactively perform the necessary research to better understand how we can adopt and implement alternative sources of energy and green initiatives for our daily operations. Moreover, we aim to maintain the record of not having harmful emissions nor spill in FY2021.

### BIODIVERSITY

The land we used for mining activities will be rehabilitated once it has been “mined-out”, in order to return the land to its pre-mining natural state. The land will be refilled with soil and trees will be replanted on the land. Fertilizer will also be added to the soil and the land. In FY2019, the Group had replanted 200 pots of trees in 5 hectares of the “mined-out” land (representing 30% of the “mined-out” land). However, in FY2020, the Group was not able to continue to achieve its target of rehabilitating 50% of the “mined-out” land due to the COVID-19 pandemic which halted operational activities for most of the year.

**Target for FY2021**

The Group will resume its efforts to rehabilitate the land used for its mining operations in FY2021, and we aim to replant up to 200 pots of trees in 5 hectares of “mined-out” land, which will bring the total number of pots of trees planted to 400 (representing 60% of the “mined-out” land).

**ENVIRONMENTAL COMPLIANCE**

Silkroad Nickel is in compliance with the regulations of the Ministry of Energy and Mineral Resources, which specify that mining activities cannot result in flooding in the mining area. To prevent flooding, the Group has built a sediment pond, which is a temporary pond built on a mining site to capture eroded or disturbed soil and protect the water quality of the water bodies within the vicinity.

There was no incidence of non-compliance with the regulations and no penalty imposed from local authorities in FY2020 (FY2019: NIL).

**Target for FY2021**

The Group will ensure the sediment ponds are well-maintained to prevent flooding and comply with all regulations of Indonesia’s Ministry of Energy and Mineral Resources.

## 6 SOCIAL

### OCCUPATIONAL HEALTH AND SAFETY

Our employees' safety and health at the workplace is one of our top priorities, and our goal is to have a zero-accident workplace. As we have engaged an external mining contractor, Jo Sinohydro-Sepco II Indo (a subsidiary of PowerChina), for our mining operations, the health and safety of the mining workers employed by the external mining contractor are not under our direct purview. However, as we are committed to providing and upholding a safe working environment for all workers, we will engage in proactive discussions with our mining contractor to constantly evaluate how the working environment and health and safety protocols can be further improved.

Any work-related incidents would primarily be investigated by our external mining contractor. We would then perform an in-depth review of all findings from the investigations. This enables us to better understand how we can play our part to address the incident and more importantly, prevent any future work-related incidents. We will also frequently review the health and safety protocols that we have at our offices and mine site, and update them when necessary, to assure our employees and all mining workers that they are working in a safe environment.

We have achieved the target we set last year. There was no record of any major accident, which resulted in any injury or death, in FY2020 (FY2019: NIL).

#### **Target for FY2021**

The Group is committed to maintaining zero work injury and death by accident as it strongly values the health and safety of all employees and mining workers. The Group will achieve this through the various aforementioned strategies and will continue to explore how the health and safety of all employees and mining workers can be further improved.

#### ***Emergency Preparedness***

The safety of our employees and mining workers is important to us. We have assigned a Safety Officer to be stationed at our mine site. We also have an evacuation plan in place, which will be activated during emergencies. Pursuant to the evacuation plan, designated safe areas have been identified, and our employees and mining workers will be evacuated to the safe areas as instructed by the Safety Officer, in case of emergencies.

#### ***COVID-19 Control Measures***

The Group has organised several initiatives to help our employees fight against COVID-19. The Group strictly enforces safe distancing measures and makes it compulsory for all employees to wear a mask at all times. Daily temperature taking is also mandated at the start and end of each day. After Singapore's circuit breaker, staggered working days and hours were introduced for a month to minimise physical interactions among employees in the Singapore office.

Despite the Group's efforts, there was an employee who contracted COVID-19 in Indonesia. However, we swiftly identified close contacts of the employee, and placed them on a two-week quarantine to ensure they did not contract the virus and were safe. The rest of the Indonesia office staff were kept safe and was able to prevent the COVID-19 virus from spreading further

as they were all practicing social distancing, staggered work days/hours and wearing masks at all times. In addition, the Company provided constant support to the employee over the entire recovery process.

## **DIVERSITY AND EQUAL OPPORTUNITY**

We offer workplace diversity and equal opportunities to our employees. For workplace diversity, we value everyone's differences. We learn from each other regardless of cultural background and bring those differences into the workplace to broaden experience and knowledge. Diversity includes not only race but gender, ethnicity, personality, age, education and background.

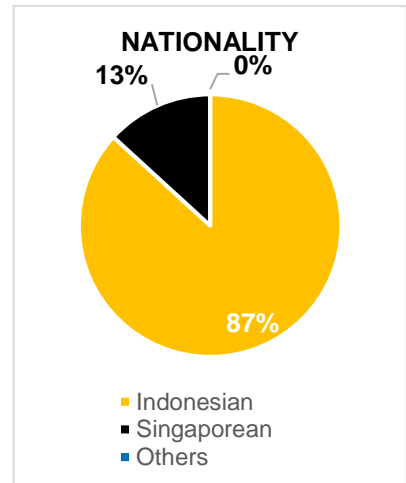
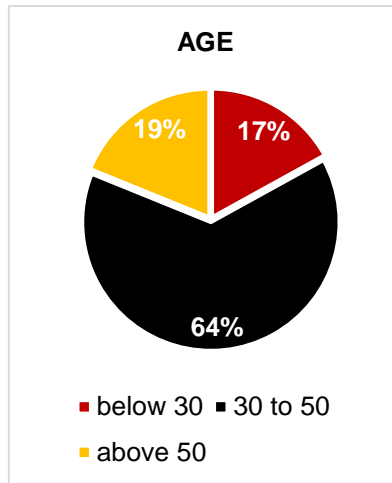
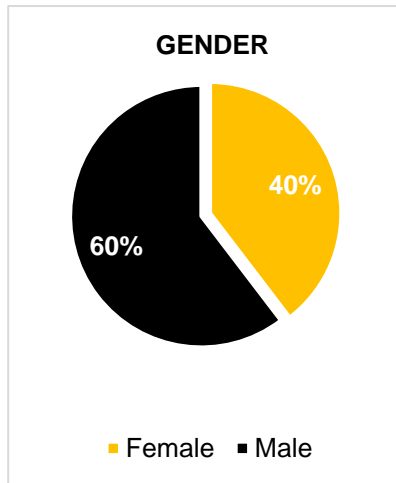
For equal opportunities, all employees are treated equally and not disadvantaged by prejudices or biases. Well performing employees will qualify for promotion or rewards regardless of their race, gender, ethnicity, personality, age, education and background. Employees are hired primarily based on their relevant credentials and experience. The Group strongly believes in delivering positive reinforcements to employees for the benefit of our long-term growth. This can be achieved by giving credit to employees who have performed well in their respective roles, through initiatives such as annual Best Employee of the Year award.

In addition, we celebrate an array of festivals such as Chinese New Year, Hari Raya, Deepavali and Christmas, by organising team meals and get togethers. The Group believes that by embracing diversity and multi-racial harmony in the workplace, it will help to foster a healthy and co-operative working environment that encourages team building. Prior to the COVID-19 pandemic, the Group had also organised a company trip for employees to Bangkok and Phuket.

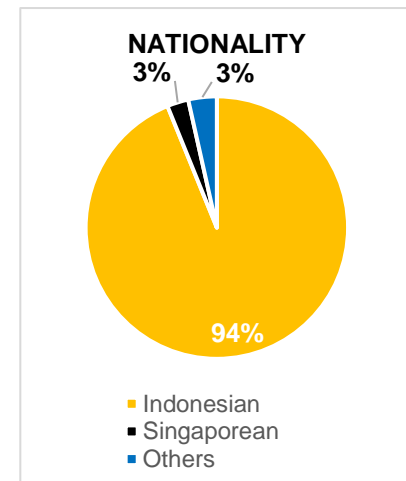
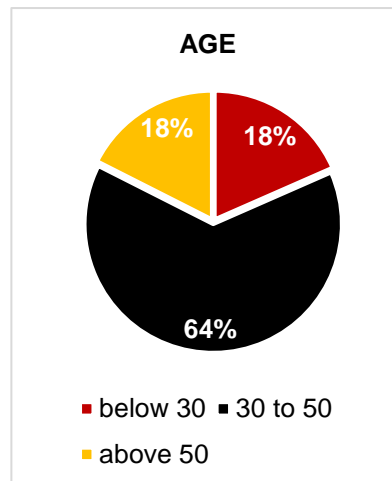
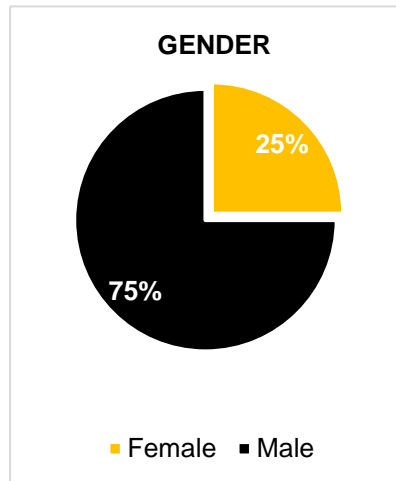
Our Group has a total of 53 employees as at the end of FY2020 (FY2019: 114), of which 9 employees joined us during the year (FY2019: 14). Our turnover rate has increased to 76% in FY2020, as compared to 10% in FY2019. Due to the COVID-19 pandemic, production activities had decreased significantly and the Group had to be conservative and did not hire any new mine site workers. The Group had also remained nimble by switching permanent employees, specifically mining workers/operators, to contractual employees as this enables the Group to reduce expenses. These were the two main reasons for the increase in turnover rate in FY2020.

Our workforce is distributed as follows:

**FY2020**



**FY2019**



Quarterly town hall sessions are conducted to keep our employees updated on our business development and human resource-related matters.

We have achieved the target we set last year. There was no report of discrimination in FY2020 (FY2019: NIL).

**Target for FY2021**

The Group aims to offer a diverse workplace that provides equal opportunities for all employees. It will continue to value diversity and treat everyone equally with respect. The Group will not tolerate any employees being disadvantaged as a result of prejudices or biases. The Group aims to maintain zero case of discrimination in FY2021.

## CHILD LABOR

We respect human rights, support the elimination of all forms of forced and compulsory labor, especially child labor. We do not employ minors as employees and we are not aware of any use of child labor by our suppliers. We will ensure that we eliminate forced and compulsory labor and child labor throughout our operations.

## LOCAL COMMUNITIES

Our Group is committed to serving and giving back to the community. We recognise that for long-term sustainability, we need to achieve a balance between being profit-driven and being a socially responsible corporate citizen.

In FY2020, we have set aside an annual budget for CSR initiatives, such as providing financial assistance for villages within close proximity of our mine site. The financial resources provided are used for the construction of houses and schools in the villages to enhance the communities' standards of living. We have achieved the target we set last year, which was to continue to support and give back to the community.

### Target for FY2021

We will continue to support various charities and community organisations in FY2021 in order to serve and give back to the community. We are committed to achieving a balance between being profit-driven and a socially responsible corporate citizen.

## SOCIOECONOMIC COMPLIANCE

We pride ourselves in having good corporate governance and observing compliance with applicable laws and regulations. The Group is committed to conducting its business with integrity and to safeguard the interest of all our stakeholders, both internal and external. We will ensure compliance with applicable laws and regulations throughout the years to come. We have achieved the target we set last year. There were no fines or penalties arising from contravention of laws and regulations in FY2020 (FY2019: NIL).

### Target for FY2021

We will strictly ensure that we always remain compliant to the laws and regulations that apply to us.

## RIGHTS OF INDIGENOUS PEOPLE

Our Group does not have any instance of violation involving the rights of indigenous people in FY2020 (FY2019: NIL).

A CSR program was implemented by the district where the Group contributed RP5,000/MT (FY2019: RP5,000/MT) based on the sales quantity sold by the Group to the indigenous people in FY2020.

### Target for FY2021

The Group will continue to support the CSR program implemented by the district.

# 7 GOVERNANCE

## CORPORATE GOVERNANCE

Our corporate governance framework and practices for FY2020 are based on the principles and the provisions of the Singapore Code of Corporate Governance issued on 6 August 2018 (the “**Code**”) which forms part of the continuing listing obligations of the Catalist Rules.

Please refer to the Corporate Governance Report section set out on pages 15 to 33 of the Company’s annual report for FY2020, for more details of our corporate governance framework and practices.

The Board confirms that, for FY2020, the Company has adhered to the principles of the Code, and the provisions of the Code (except where otherwise explained). In so far as any provision has not been complied with, appropriate explanations have been provided and how the practices the Company had adopted are consistent with the intent of the relevant principle of the Code. The Company will continue to assess its needs and implement appropriate practices accordingly.

## ENTERPRISE RISK MANAGEMENT

The Board acknowledges its responsibility for the governance of risk and ensuring that the Management maintains a sound system of risk management and internal controls to safeguard interest of shareholders and the Group’s assets.

Please refer to the Corporate Governance Report section set out on pages 15 to 33 of the Company’s annual report for FY2020, for more details of our governance and risk management practices.

## BUSINESS ETHICS

All our staff are reminded of the importance of upholding the highest standards when it comes to business ethics. The Group regularly updates relevant staff with development in international and local regulations.

We have achieved the target we set last year. There were no significant fines or non-monetary sanctions for non-compliance with laws and regulations in FY2020 (FY2019: NIL).

### **Target for FY2021**

The Group targets to maintain its record of complying with international and local laws and regulations to avoid incurring any significant fines or face any non-monetary sanctions.



## GRI STANDARDS CONTENT INDEX

GRI Standard	Disclosure	Reference / Description
<b>GRI 101: Foundation 2016</b>		
<b>GENERAL DISCLOSURE</b>		
<b>GRI 102: General Disclosures</b>	102-1	Name of organisation Silkroad Nickel Ltd.
	102-2	Activities, brands, products and services FY2020 Sustainability Report (SR) page 1
	102-3	Location of headquarters Singapore
	102-4	Location of operations SR page 1
	102-5	Ownership and legal form FY2020 Annual Report (AR) pages 13, 47, 98 to 99
	102-6	Markets served SR page 1, as well as AR page 81
	102-7	Scale of the organisation SR pages 1, 7, 11 to 12
	102-8	Information on employees and other workers SR pages 11 to 12
	102-9	Supply chain SR page 1
	102-10	Significant changes to the organisation and its supply chain None
	102-11	Precautionary Principle or approach We do not specifically address the precautionary approach.
	102-12	External initiatives SR page 13
	102-13	Membership of associations The subsidiary company, PT Teknik Alum Service, is a member of the Association of Nickel Mining Indonesia (Assosiasi Penambang Nikel Indonesia - APNI).
	102-14	Statement from senior decision maker SR pages 2 to 3
	102-16	Values, principles, standards and norms of behaviour SR page 14
	102-18	Governance structure AR pages 15 to 36
	102-40	List of stakeholder groups SR pages 4 to 5
	102-41	Collective bargaining agreements None
	102-42	Identifying and selecting stakeholders SR pages 4 to 5
	102-43	Approach to stakeholder engagement SR pages 4 to 5
	102-44	Key topics and concerns raised SR pages 4 to 6
	102-45	Entities included in the consolidated financial statements AR page 68
	102-46	Defining report content and topic boundaries SR pages 2 to 3
	102-47	List of material topics SR page 5 to 6
	102-48	Restatement of information None
	102-49	Changes in reporting None
	102-50	Reporting period SR page 2
	102-51	Date of most recent previous report 29 May 2020
	102-52	Reporting cycle Annually
	102-53	Contact point for questions about the report SR page 3
	102-54	Claims if reporting in accordance with the GRI Standards SR page 2
	102-55	GRI content index SR pages 15 to 16
	102-56	External Assurance No external assurance has been sought. We may seek external assurance in the future.
<b>MATERIAL TOPICS</b>		
<b>GRI 201: Economic performance</b>	201-1	Direct economic value generated and distributed SR page 7
<b>GRI 205: Anti-corruption</b>	205-1	Operations assessed for risks related to corruption SR page 7
<b>GRI 304: Biodiversity</b>	304-2	Significant impacts of activities, products, and services on biodiversity SR pages 8 to 9
<b>GRI 307: Environmental compliance</b>	307-1	Non-compliance with environmental laws and regulations SR page 9

## GRI STANDARDS CONTENT INDEX

GRI Standard	Disclosure		Reference / Description
<b>GRI 403: Occupational Health and Safety</b>	403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	SR pages 10 to 11
<b>GRI 405: Diversity and equal opportunity</b>	405-1	Diversity of governance bodies and employees	SR pages 11 to 12
<b>GRI 408: Child Labor</b>	408-1	Operations and suppliers at significant risk for incidents of child labor	SR page 13
<b>GRI 411: Rights of Indigenous People</b>	411-1	Incidents of violations involving rights of indigenous peoples	SR page 13
<b>GRI 413: Local Communities</b>	413-1	Operations with local community engagement, impact assessments, and development programs	SR page 13
<b>GRI 419: Socioeconomic Compliance</b>	419-1	Non-compliance with laws and regulations in the social and economic area	SR page 13