



KSH HOLDINGS LIMITED
Sustainability Report 2019

Table of Contents

1	MESSAGE FROM THE CEO / BOARD STATEMENT	3
2	ABOUT THE REPORT	4
2.1	Report Scope	4
2.2	Report Methodology	4
2.3	Report Structure	4
2.4	Report Contact and Feedback	5
3	CORPORATE PROFILE	6
3.1	Our Vision and Mission	6
3.2	Governance	6
3.3	Ethics and Compliance	7
4	INTEGRATING SUSTAINABILITY INTO OUR BUSINESS	8
4.1	Sustainability Management Framework	8
4.2	Key Stakeholders and Material Issues	8
4.3	Alignment with International Initiatives	9
4.3.1	Sustainable Development Goals (SDGs)	9
4.3.2	United Nation Global Compact (UNGC)	11
4.4	Awards and Achievements	12
5	STAKEHOLDER ENGAGEMENT	13
5.1	Protecting Our Environment for the Future Generations	14
5.1.1	Our Approach	14
5.1.2	Reduction of Carbon Footprint	14
5.1.3	Promoting Green Practices	15
5.2	Caring for Our Employees	16
5.2.1	Our Approach	16
5.2.2	Employment Practices	16
5.2.3	Workforce Diversity	18
5.2.4	Employee Benefits and Welfare	22
5.2.5	Safety and Health in the Workplace	22
5.2.6	Individual Rights	23
5.3	Focusing on Our Customers' Needs	24
5.3.1	Our Approach	24
5.3.2	Integrated Management System (IMS) - Construction Quality and Safety Management	25
5.3.3	Customer Feedback and Satisfaction	26
5.3.4	Data Safety and Privacy	26

5.4	Partnering Our Suppliers.....	27
5.4.1	Our Approach	27
5.4.2	Supplier Selection.....	27
5.4.3	Supplier Review	27
5.5	Supporting for Our Community	28
5.5.1	Our Approach	28
6	PERFORMANCE TABLE.....	29
6.1	Energy Usage and CO ₂ Emissions.....	29
6.2	Employment Profile	30
6.3	Employees Engagement and Training.....	31
6.4	Customer Feedback	32
6.5	Supplier Screening Using Environmental Criteria	33
6.6	Community Contribution	34
7	GRI CONTENT INDEX	35

1 MESSAGE FROM THE CEO / BOARD STATEMENT

KSH Holdings Limited (“KSH” or the “Group”) (“金成兴控股有限公司”) is a well-established Construction, Property Development and Property Investment group that was incorporated in 1979 and has been listed on the Mainboard of the SGX-ST since February 8, 2007. KSH is an A1-graded contractor under BCA CW01, with the ability to tender for Public Sector Construction projects of unlimited value and is a main contractor for both the public and private sectors in Singapore. The Group also has an A2 grade under BCA’s CW02 category for civil engineering, allowing KSH to tender for Public Sector projects for values of up to \$85 million.

It gives me great pleasure to introduce our calendar year (“2019”) Sustainability Report, which highlights the progress and achievements of our organisation over the previous 12 months, with particular focus on our commitment to working alongside our valued stakeholders to build a sustainable business based on our resilience, adaptability and innovation.

In this, our third sustainability report, we firmly believe that building a sustainable business is vital to our continued success and that we must be fully accountable for our impact on the environment, our customers, our people and our community as well as its financial performance.

The delivery of sustainable results is, however, a critical aspect of our ability to remain a strong and financially stable company. Acknowledging this helps to put into focus our commitment to principles laid out in our Corporate Sustainability Policy. Our responsibility to society is to ensure that sustainable practices are incorporated into every link of our value chain. We must meet the needs not only of our customers, employees and the community we operate in, but also those of our environment and our future generations.

This report provides detail about how we have met our responsibilities with our key stakeholders during 2019 and beyond.

2 ABOUT THE REPORT

This sustainability report articulates our commitment to sustainability and transparency. This is our third sustainability report. This report is designed to provide a transparent and balanced view of the company, to reflect the interests of our key stakeholders, and to address those interests pragmatically. This report aims to include comprehensive and accessible information on the company's strategy towards sustainability, key issues as well as data according to recognized standards.

2.1 Report Scope

The report covers the performance of our consolidated entities in 2019. The report content focuses on the sustainability performance, activities and initiatives that are under our direct control, including our Singapore offices and operations, our local supply chain. Material issues and topics described in this report have been selected according to their significance within the company boundaries, the sustainability context and the expectations of stakeholders. All material topics disclosed in this report are relevant to the activities in Singapore only. Nevertheless, our corporate governance and sustainability approaches are drawn from the policies and practices set at the Group level.

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

2.2 Report Methodology

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

We did not seek external assurance for this report.

2.3 Report Structure

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

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

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

2.4 Report Contact and Feedback

Thank you for your interest in our Sustainability Report. We welcome and value your feedback on the content of this report and encourage you to contact us through the following channels:

- ❖ In writing to:
mainoffice@kimsengheng.com.sg
36 Senoko Road,
Singapore 758108
- ❖ Via our contact page at our website: www.kimsengheng.com

This report is provided in PDF format only.

3 CORPORATE PROFILE

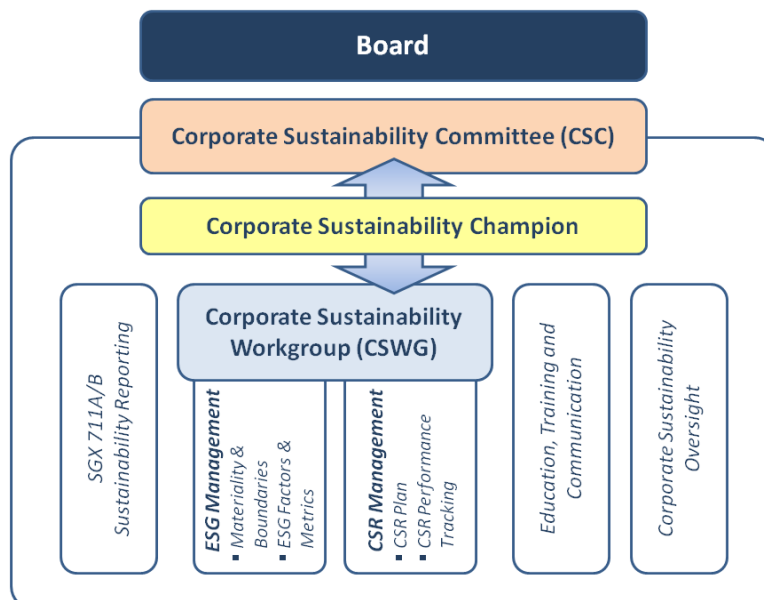
3.1 Our Vision and Mission

Our vision is to be a leader in building construction services in Singapore and a sizeable investor in property development in the region.

In our mission towards our vision, we are committed to contributing social and economic benefits to our society through the provision of high quality and cost-effective services in construction and niche property development activities in the region. We provide innovative solutions in an efficient and professional manner to meet our customers' requirements in building and property businesses by bringing together the best available resources and continually improving our processes to deliver excellence. As we achieve the above, we will also generate fair and satisfying economic value for our shareholders.

3.2 Governance

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



3.3 Ethics and Compliance

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

4 INTEGRATING SUSTAINABILITY INTO OUR BUSINESS

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

4.1 Sustainability Management Framework

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

4.2 Key Stakeholders and Material Issues

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

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

Stakeholders	Material Issues	Significance
Future Generation	<ul style="list-style-type: none"> ❖ Materials recycling of product material and packaging ❖ Environmental education of our employees and customers ❖ Reduction of carbon emissions ❖ Reduction of energy consumption ❖ Compliance with best practices and standards on Green initiative, such as, Building & Construction Authority (BCA) Green & Gracious Builders Award 	<p>Our sustainability agenda for the environment and future generation is embedded into the day-to-day business activities among our staff. We continue to strive to improve from a holistic perspective through the company culture and practices. Within the big picture of sustainability, we take steps to focus on key goals such as curbing global warming, conserving and recycling resources. Such areas are crucial to a sustainability economic ecosystem for our customers which are keys to our business sustainability.</p>
Employee	<ul style="list-style-type: none"> ❖ Employee well-being through workplace health & safety ❖ Regular training of employees on critical skill sets to sustain competitiveness ❖ Competitive compensation scheme to retain talents ❖ Non-discrimination, diversity and equality ❖ Senior management engagement with employees 	<p>An ethical and professional working environment is crucial in cultivating a corporate culture which motivates and empowers our employees to meet their full potential both professionally and personally.</p>

Customer	<ul style="list-style-type: none"> ❖ Safety of our customers in our services delivery ❖ Customer data privacy ❖ Customer satisfaction and customer-centric approach 	The quality and safety of our services and products to our customers are the core focuses of our commitments. Through our quality and safety commitments to our customers, we will, in turn, be contributing to their own successful sustainable development.
Supplier	<ul style="list-style-type: none"> ❖ Environmental, labour and human rights impact in the supply chain 	To effectively and meaningfully implement our sustainability agenda, it is important that our suppliers and partners share our values in their business practices in the areas such as the environment, human rights, labour practices and corporate ethics. Such alignment of values is a crucial part of building mutually beneficial relations with suppliers and channel partners to enhance both their own competitiveness and that of ours.
Community	<ul style="list-style-type: none"> ❖ Impact on communities and local economies, and future generation education ❖ Economic value generated and distributed to local community 	In our vision in moving our business to high-value-added business areas, abilities to identify and attract people with knowledge and talent are crucial to the sustainability of our businesses. Within a broad range of our community engagements, we focus on the education of today's youth and providing financial and practical support to targeted local and communities, through donation, sponsorship, and voluntary activities.
Common to All Stakeholder Groups	<ul style="list-style-type: none"> ❖ Compliance with prevailing laws and regulations ❖ Good corporate governance & ethics, transparency and non-financial reporting ❖ Ethical business practices such as anti-corruption ❖ Grievance mechanisms 	Legal compliance and ethical practices are the core foundation of our business. Our culture is established and sustained through strong corporate governance, transparent reporting and open communications with all our stakeholder groups.

4.3 Alignment with International Initiatives



4.3.1 Sustainable Development Goals (SDGs)

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

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

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

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

SDG Goal	Relevant Targets to Our Businesses <i>(Source: http://sustainabledevelopment.un.org)</i>	Our Participation
	13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.	We have our own internal processes and environmental policies to reduce electricity and fuel consumption. Our approach to mitigating climate change includes staff training and implementing energy-efficient measures. We monitor and report our GHG emissions and set reduction targets.
	15.1: By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements.	All the paper used in our offices is either Forest Stewardship Council (FSC) certified or made from KHAN-NA. We actively promote the use of such papers across our organisation. Through that, the Company supports efforts in mitigating global warming and the creation of positive rural community engagement, job opportunity, and better livelihood for the farmers and members of the community.



The following SDG goals are relevant to our business, operations and value chain. They are addressed in our various policies at group level. Such goals are also embedded in various initiatives carried out across the organization.



We do not believe these goals are relevant to our business or industry. They are not within our boundaries and scope of influence; therefore, we are currently unable to make noticeable contributions to such goals.

4.3.2 United Nation Global Compact (UNGC)

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

Below are the references of our report to the 10 principles of the UNGC.

Principle		Report Section
Human Rights		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights.	5.2.2.1, 5.2.6
Principle 2	Make sure that they are not complicit in human rights abuses.	5.2.2.1, 5.2.6
Labour		
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	5.2.2.1, 5.2.6
Principle 4	Elimination of all forms of forced and compulsory labour.	5.2.2.1, 5.2.4.1
Principle 5	Effective abolition of child labour.	5.2.1, 5.2.2.1
Principle 6	Elimination of discrimination in respect of employment and occupation.	5.2.2.1, 5.2.6
Environment		
Principle 7	Businesses should support a precautionary approach to environmental challenges.	5.1.1
Principle 8	Undertake initiatives to promote greater environmental responsibility.	5.1.2, 5.1.3
Principle 9	Encourage the development and diffusion of environmentally friendly technologies.	5.1.2, 5.1.3
Anti-Corruption		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.	3.3

4.4 Awards and Achievements

Year	Awards and Achievements
2019	Certificate of Accreditation for Male Restroom
2019	Certificate of Accreditation for Female Restroom
2019	Construction Excellence Award (Merit)
2019	Construction Excellence Award
2019	RoSPA Health & Safety Award (Gold)
2019	WSH SHARP Award
2018	The Royal Society for the Prevention of Accidents - RoSPA (Gold)
2018	WSH SHARP Award
2018	Green & Gracious Builders Award
2017	The Royal Society for the Prevention of Accidents - RoSPA (Gold)
2017	Green Mark Award (Platinum)
2016	Green Mark Award (Platinum)
2016	Quality Mark Award (Star)
2016	The Royal Society for the Prevention of Accidents - RoSPA (Gold)
2016	Construction Excellence Award (Merit)
2015	Quality Mark Award (Merit)
2015	The Royal Society for the Prevention of Accidents - RoSPA (Gold)
2015	Green & Gracious Award
2014	The Royal Society for the Prevention of Accidents - RoSPA (Gold)
2014	Construction Excellence Award (Merit)
2013	Green Mark Award (Gold)
2013	Green Mark Award (Gold Plus)
2013	The Royal Society for the Prevention of Accidents - RoSPA (Gold)
2013	Construction Excellence Award (Merit)
2013	Construction Excellence Award
2013	Quality Mark Award (Star)

5 STAKEHOLDER ENGAGEMENT

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

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

Stakeholder	Management Approach	Initiatives	Outcome and Responses	Boundaries
Environment and Future Generation	Environmental Management System (EMS), Environmental policy, EMS guidelines, Waste Recycling/Management, Green Campaigns, ISO 14001 Certification	Internal Awareness and Education	Energy Efficient Lighting (e.g. LED), Digital Filing and Document to Reduce Paper Consumption.	Singapore Operations
Employee	Code of Conduct, Fair Employment Practices, Training and Career Development, Central Provident Fund (CPF), WHS Framework, OSHAS Certification, bizSAFE	Staff Communication Sessions, Staff Feedback Process, Staff Exit Interviews	Training Programmes, Employee Benefits, Re-engagement	Singapore Operations
Customer	Customer Relationship Management System, Policies on Quality Assurance, Data Security for Customer Information, Privacy policy, ISO 9001	Customer Feedback Process, Competitive Benchmarking survey, Customer Data Protection Awareness and Education Program	Customer Complaints and Compliments Statistics and Trending	Singapore Operations
Supplier	Supplier Selection and Regular Review Process	Feedback and Communication with Suppliers through Supplier Performance Review	Incident Register, Supplier Engagement	Singapore Operations
Community	Selection of Community Initiatives in Alignment with Organization Goals	CSR Programme, Awards and Accolades	Internship Programmes to support local students, we make regular donations to support various community initiatives.	Singapore Operations

5.1 Protecting Our Environment for the Future Generations

5.1.1 Our Approach

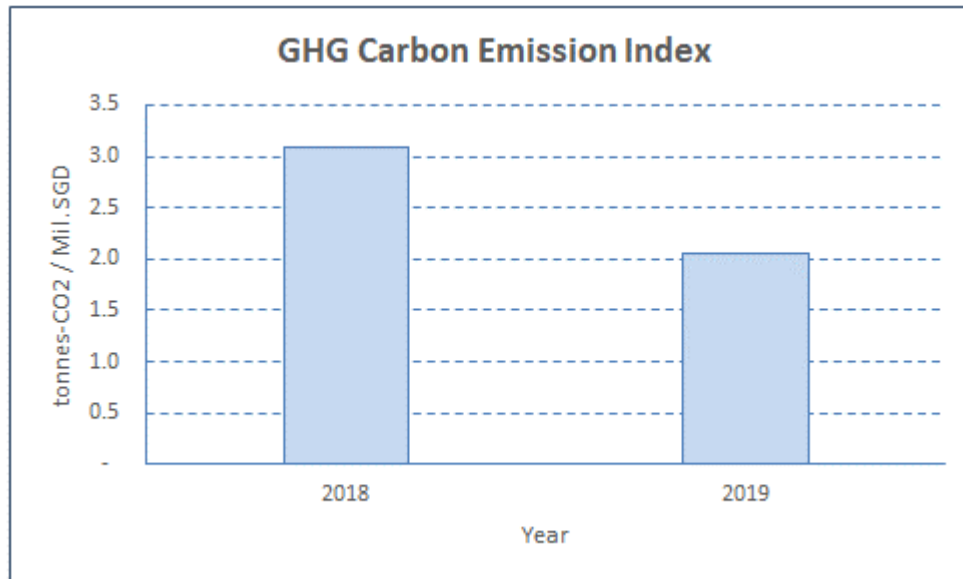
We are committed to maintaining and building in accordance with the prevailing environmental policies and standards. Under the broader Corporate Sustainability Policy, we have specific Environmental Policy that set the tone of our commitment from senior management that transcend throughout the business and operation across the Group. We continually seek new and innovative ways to reduce the environmental impact of our products and services while maintaining the highest levels of quality. We recognise our responsibility to protect the environment for the health and well-being of our future generations.



5.1.2 Reduction of Carbon Footprint

We recognize that effective management and monitoring of carbon footprint can reduce operating costs, raise brand profile, create a competitive edge and increase stakeholder value. Our carbon footprint is measured in terms of Greenhouse Gas (GHG) emission. However, GHG emission is an absolute measure of how much carbon dioxide equivalent (CO₂e) is emitted. Our GHG emission is predominantly indirect (Scope 2) emission. We do not include the GHG emissions generated by our suppliers (Scope 3).

Considering the changes and dynamics of our business and operations, we established our GHG emission efficiency index for consistent tracking of carbon footprint over time. To this end, we have set a target for a GHG emission efficiency improvement of 10% from our 2017 level by 2030. Our target for GHG emission improvement is about 0.7% per year. Although various business lines and operations account for different percentage of GHG emissions across the organization, they all support this target and have aligned our environmental objectives accordingly.



5.1.3 Promoting Green Practices

We have embraced various green practices in our business and operation such as ISO 14001 and Green and Gracious Builders Award from Building & Construction Authority (BCA).

The ISO 14000 family of standards provides practical tools for companies and organizations of all kinds looking to manage their environmental responsibilities. ISO 14001:2015 sets out the criteria for an environmental management system and can be certified to. It maps out a framework that a company or organization can follow to set up an effective environmental management system. It can be used by any organization regardless of its activity or sector. Using ISO 14001:2015 provides assurance to our management and employees as well as external stakeholders that environmental impact is being measured and improved.

BCA launched the Green and Gracious Builder Scheme in February 2009. The scheme was introduced to raise the environmental consciousness and professionalism of builders. It is also a benchmark of a builder's corporate social responsibility to the environment and the general public. Apart from setting standards for green practices, it also sets standards for gracious practices. These gracious practices will improve the image of our builders and the construction industry particularly among neighbours and residents, some of whom may have been affected by construction activities near them.

BCA's efforts at developing a sustainable built environment have gained sufficient momentum and been well accepted by the industry. Many have responded enthusiastically to the BCA Green Mark Scheme – a scheme that recognizes the efforts of developers, architects and engineers in contributing to environmental sustainability in their development projects. However, one of the key players in the construction value chain, the builders, has not been well recognized. They also do contribute to environmental sustainability and environmental protection when they go green and adopt 'friendlier' construction site management and practices. Given the high visibility and impact of construction works, it is also important for builders to be socially responsible to the environment, the neighbours and general public by gracious practices during construction. Hence the Green and Gracious Builder Scheme was introduced to raise the environmental consciousness and professionalism of builders. Together with the BCA Green Mark Scheme, this scheme will form part of the holistic framework to shape a sustainable built environment for Singapore. *

KSH was awarded the BCA Green and Gracious Builder Award (Excellent) in 2012. The Award aims to raise environmental consciousness and professionalism among builders. It recognises builders who take the effort to address environmental and public concerns arising from construction works and serves to develop a more positive image of the industry over time.

KSH had implemented on our sites the innovative use of self-irrigation system using treated water to water tree/plants at the site, use of movable noise barriers for the construction works, implementing compulsory storage of cement bag on site to reduce dust generated and reduces wastages etc.

** Source: The Green and Gracious Builder Guide*

5.2 Caring for Our Employees

5.2.1 Our Approach

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

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

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

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

5.2.2 Employment Practices

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

5.2.2.1 The Tripartite Guidelines on Fair Employment Practices

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

For our operations outside Singapore, our HR practices are further guided by the local prevailing laws and regulations of the countries as well as local culture, norms and racial sensitivity.

5.2.2.2 Communications

As our Company grows, effective communications across the organization are crucial to ensure continuous alignment of objectives of the employees and the organizational objectives. We achieve this through our various communication sessions customized based on the target employees. Communication sessions for our managers are held on a regular basis. Agendas covered at these sessions are customized in appropriate to the target functional scope of the managers. For example, in monthly managers' meeting, operational agendas such as leadership and operation issues may be discussed while at the quarterly sessions high level topics include strategic business directions, new service launches, ongoing developments and key project reviews.

5.2.2.3 Employee feedback

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

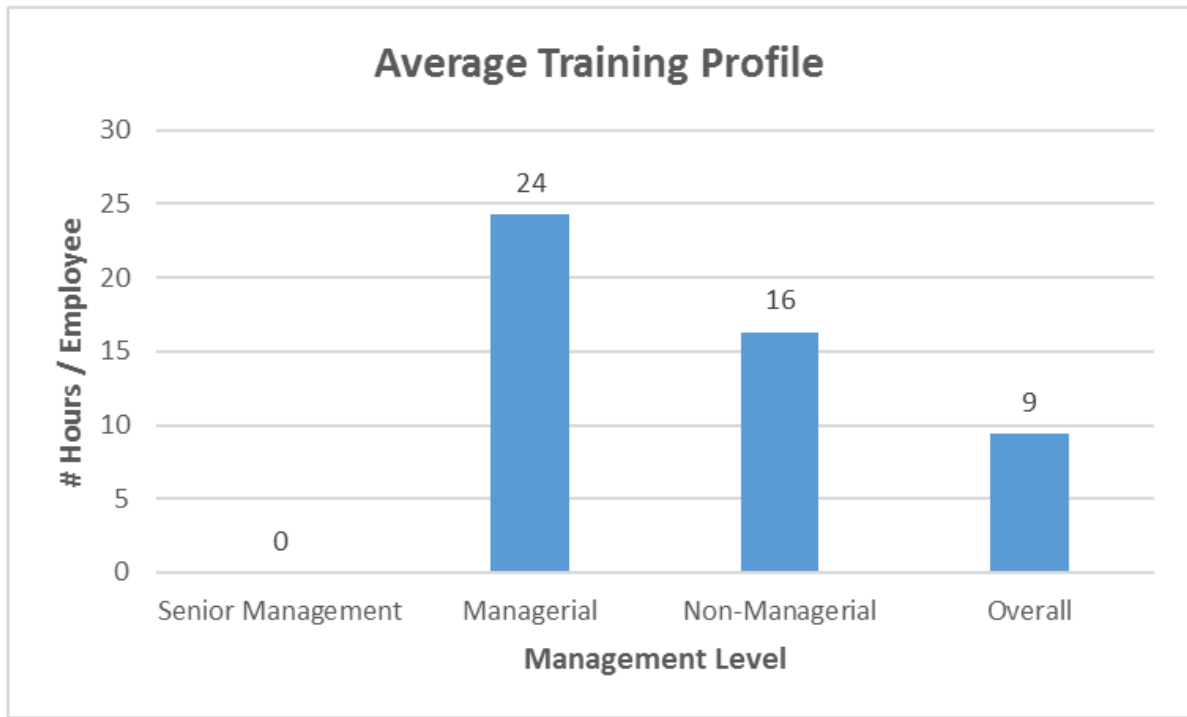
In addition, there are other feedback channels for areas specific to business and function, such as health and safety issues and compliance issues. Such feedbacks are managed by the leaders and managers of their specific business and function domain. We have also established reporting and escalation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

5.2.2.4 Career Development and Training

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

Our training programmes cover a variety of areas catering for employees with difference job scopes and skills set requirements. Our core training curriculum and contents are developed and guided by well-established industry and international standards. In addition, specific training curriculums are developed based on the specific requirements of the specific businesses and functions. Training topics range from soft skills development in areas such as communication and leadership, to technical programmes covering project management and office productivity tools. We also offer sponsorship to enhance their professional development and to further their studies.

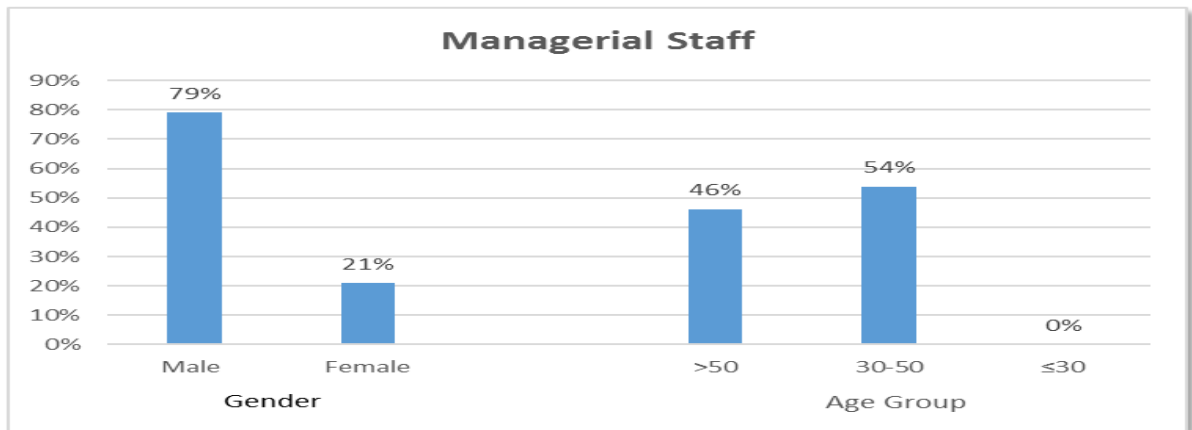
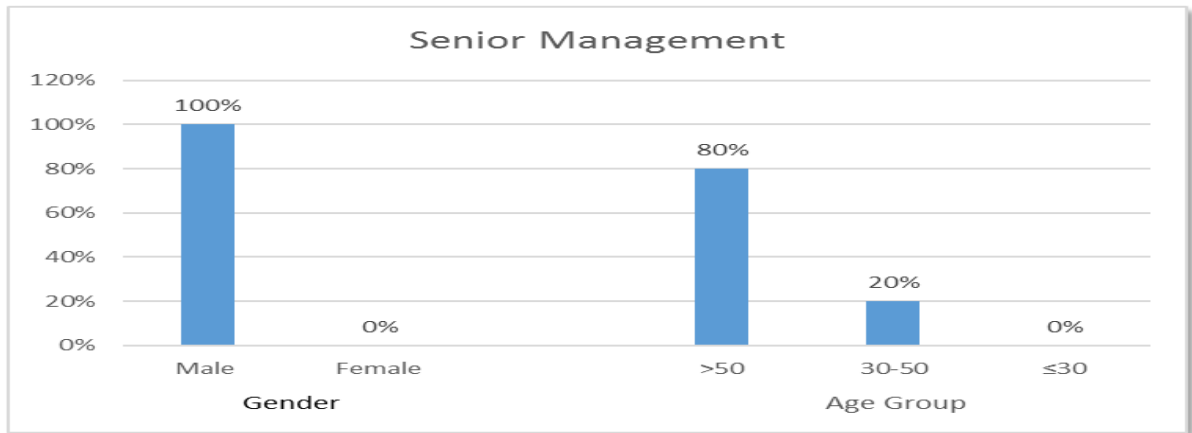
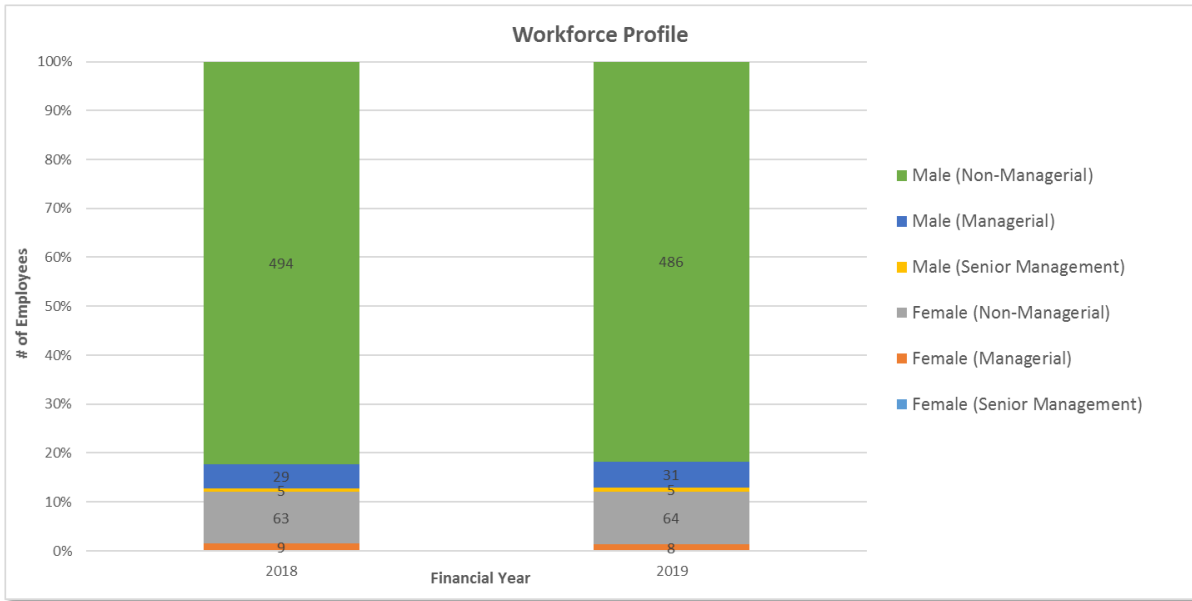
In 2019, each employee received an average of 9.4 hours training. We recognized that training requirements vary depending on the levels of management responsibilities. Each senior management registered an average of 0 hours of training while managerial and non-managerial staffs received an average of 24.3 hours and 16.3 hours of training respectively. In light of the changing business requirements and opportunities in variety of training methodologies, we continue to revise our training curriculum and programme to align with the organization objectives and to strive for effectiveness and efficiency in our training approach.

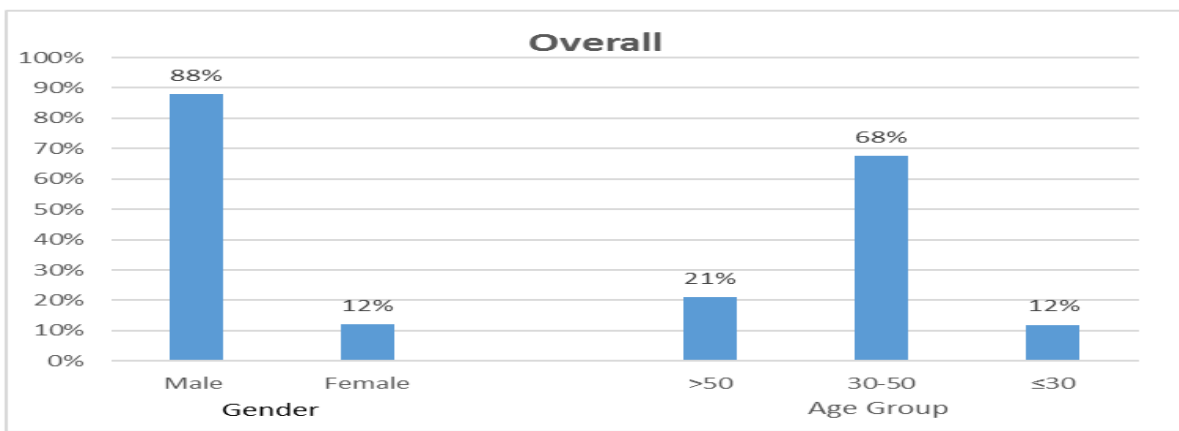
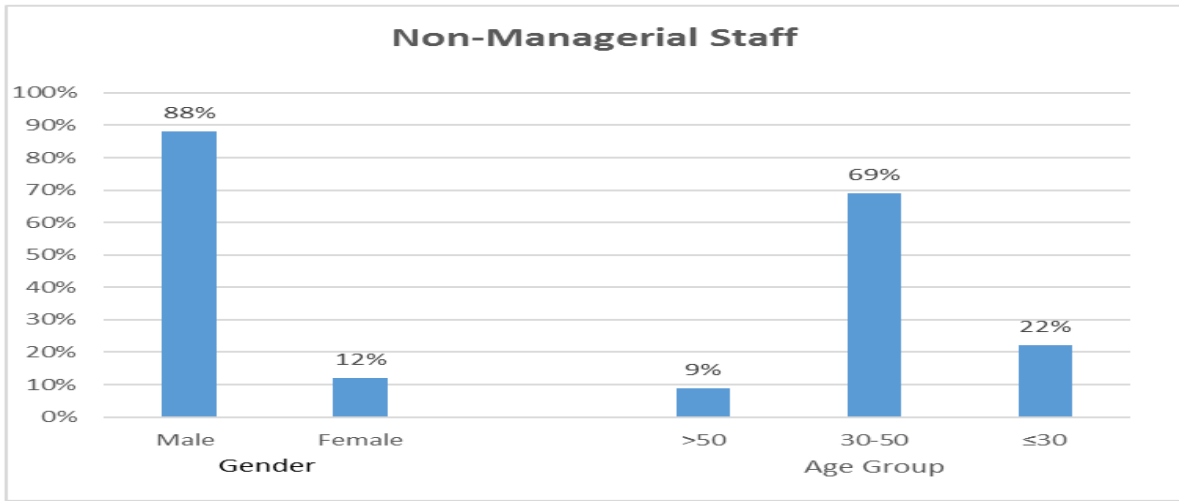


5.2.3 Workforce Diversity

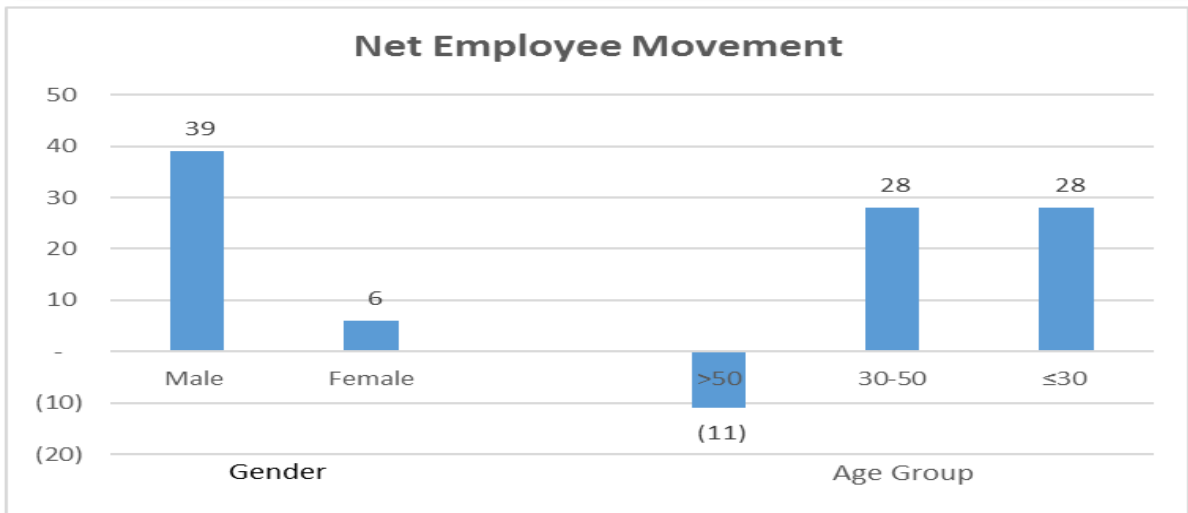
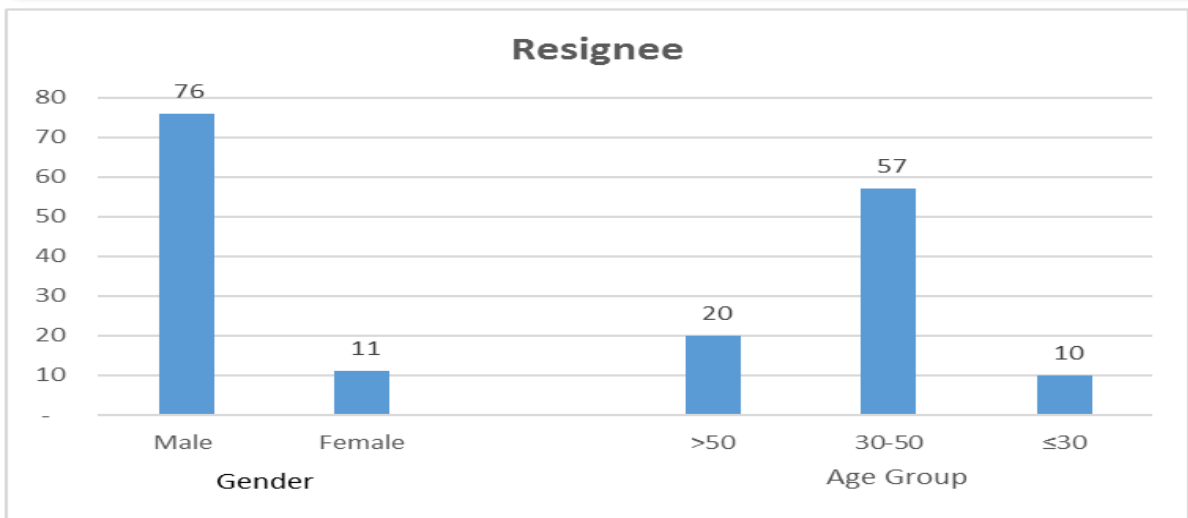
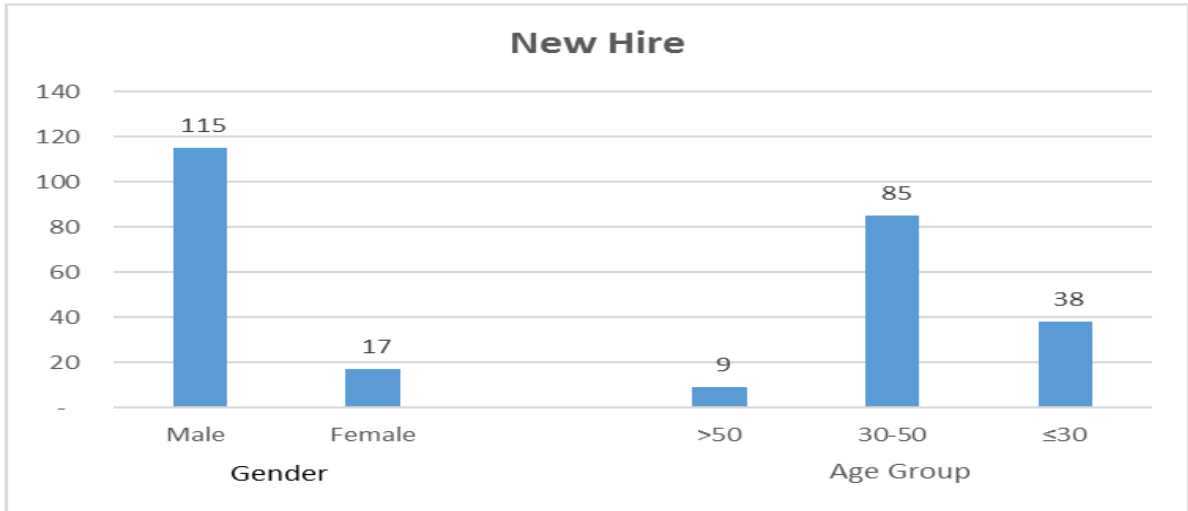
Our business thrives on diversity. As such, we leverage on a host of strengths and skills that can only come from a diverse workforce embracing employees from various ethnic groups, religion, age and gender.

In 2019, 72 of our employees were female, comprising 12% of our workforce, while 522 (88%) employees were male. For senior management, 5 were males (100%), and there were 0 females (0%). For other management level, 8 females (21%) held managerial positions compared to 31 males (79%), while 64 females (12%) and 486 males (88%) held non-managerial positions. From the age profile perspective, there were 122 employees below 30 years old. The number of employees between 30 and 50 years old was 401 as compared to 71 employees above 50 years old.





In 2019, we hired a total of 132 new employees, while 87 resigned during the same period. As a result, we have a net increase of 67 in our workforce. Out of the new hires, 38 of the new hires were below the age of 30; 85 were between 30 and 50 years old while 9 were above 50 years old. The gender ratio of new hires was 115 males to 17 females. For the resignees, 10 of the resignees was below the age of 30; 57 was between 30 and 50 years old while 20 was above 50 years old. The gender ratio of resignees was 76 males to 11 females.



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

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

5.2.4 Employee Benefits and Welfare

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

In addition to the statutory benefits outlined in the Employment Act, we provide beyond-compliance-level benefits to our fulltime employees such as compassionate leave.

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

For the welfare of our employees, we aim to create an environment that allows our employees to achieve harmony in their personal and professional life. We achieve this through arrangements of leisure activities and subsidies to support healthcare and wellness programmes.

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

5.2.4.1 Retirement and Healthcare

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

5.2.5 Safety and Health in the Workplace

In our core business and operation in construction industrial, workplace safety is paramount to our employees, particularly in the construction sites. We are committed to Workplace Safety and Health (WSH) and take every precaution to prevent occupational injuries among employees. We believe that optimum work conditions not only make our employees safer, but also boost morale.

As an essential requirement in Singapore, we are in compliance with the Ministry of Manpower's Workplace Safety & Health Act. However, we believe culture of workplace safety and health should be nurtured leading from the senior management. We have set the tone of our commitment in workplace safety and health through our various group wide policies. In addition, we have attained certification for OHSAS 18001 and bizSAFE. These well recognised standards provide us with the frameworks to manage risks associated with safety and health in our workplace.



In the event of a pandemic crisis, such as the previous SARS Pandemic and the currently on-going COVID-19 pandemic, we shall take the necessary steps and measures to ensure safety and well-being of our workforce, including response to governments' call to institute safe distancing measures and embrace 'work from home' arrangements to the furthest extent possible. We shall provide protective gears such as facemasks and hand sanitizers to employees and facilitating telecommuting. As a pandemic crisis may cause an economic downturn which threatened livelihoods and job security of our employees. We shall train and reskill our staffs and workers to meet new challenges, leveraging on training grants as an appropriate alternative to retrenchment. We shall keep everyone within our organization connected virtually, in form, and more intangibly in spirit.

5.2.6 Individual Rights

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

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

In 2019, none of our workforce was covered by a collective bargaining agreement; no incidents of forced labour, child labour or young workers were identified across the organisation, and no human rights-related grievances have been reported.

5.3 Focusing on Our Customers' Needs

5.3.1 Our Approach

Customer service, quality products and the highest level of product safety have always been our priorities, with customer satisfaction being the goal of all our corporate activities. Customer trust and retention starts with our people and products, we place the utmost importance on training our employees in customer service excellence and in continuously striving to improve the quality and safety of our products and services. Such culture of quality and safety in our products and services is driven from top management down to operations starting with our Quality Policy.

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

Reliability and quality of our construction projects are of paramount importance to us. Health and safety of our customers are always our priority. To ensure product safety to our customers, we have in place a set of key quality assurance processes and best practices, such as ISO 9001, OHSAS 18001, bizSAFE, BCA Green & Gracious and CONQUAS, to ensure compliance with regulations and international standards. Ultimately, we aim to totally eliminate product safety incidents so as to foster a 'Safety First' culture through employee training and quality control.

Our construction projects undergo quality assessments in the following areas:

- ❖ **Structural Works.** The structural integrity of the building is of paramount importance as the costs of failure and repairs are very significant.
- ❖ **Architectural Works.** Architectural Works deal mainly with the finishes and components. This is the part where the quality and standard of workmanship are most visible.
- ❖ **Mechanical & Electrical (M&E) Works.** The quality of M&E Works is important in view of its increasingly high cost proportion and its impact on the performance of a building.

We internalize and integrate such best practices which we operationalize them in our Integrated Management System (IMS).



5.3.2 Integrated Management System (IMS) - Construction Quality and Safety Management

Our Integrated Management System (IMS) implements and operationalizes our integrated Quality, Environmental, Occupational Health & Safety (QEHS) practices. IMS is an enabler which allows us to effectively and efficiently manage our QEHS improvement cycles from end-to-end which covers stages such as Defining, Planning, and Implementation activities for improvement and retention of historical records as case studies for learning purposes. Such improved processes include measurement, monitoring, analysis of data for meaningful and realistic projection of performance measurement. IMS also allows us to effectively and efficiently monitor and evaluate the compliance with applicable legal and/or other requirements as appropriate. IMS also acts as our knowledge retention centre to ensure records and results of the above activities are maintained for future reference and actions.

The governance over QEHS transcends across from Top Management, Management Representative (MR) / Alternate Management Representative (Alt MR) and QEHS Management Committee including other interested parties (public, authorities, clients, consultants and etc.). With strong support from top management, The MR / Alt MR / respective Process Owners / EHS Management Committee Members organise Task Force to look into areas for improvement studies and to formulate corresponding quantifiable performance indicators and targets. The Task Force shall maintain records to provide evidence of study, evaluation and monitoring. Records will be defined and maintained by the Task Force for review by MR, Alt MR and Top Management.

These performance indicators and targets are reviewed regularly during Management Review. At the review, new targets may be set for improvement measure in-line with the IMS policies and/or new objectives and targets are confirmed.

For further assurance, we conduct regular IMS Internal Audit (IA). The findings and data from Internal Audit will be assessed and re-organised for use in analysis for learning and improvement purposes of system and process where appropriate.

In the event of a pandemic, such as the previous SARS Pandemic and the currently on-going COVID-19 pandemic, we shall take the necessary steps and measures to ensure safety and well-being of our customers and their employees, including response to governments' call to institute safe distancing measures and contact tracing at sites and office. We shall provide protective gears such as facemasks and hand sanitizers to visiting customers and facilitating telecommuting to avoid physical contact. Extension of assistance to customers where possible during a pandemic crisis to support them, so that they can trust us and continue to use our services. The same steps and measures will apply to our suppliers and business associates to protect them and their employees who we need to work with in delivering services to our customers.

5.3.3 Customer Feedback and Satisfaction

The organisation emphasizes on fulfilling customer requirements and customer satisfaction. The top management ensures that customer requirements are determined at all stages of customer related processes. The organisation will follow up with customers after delivery to receive feedback on the quality of the services and products. For customer specifications, the organisation will contact customers to clarify whenever there is incompleteness of information or ambiguity of the information. The top management also ensures that customer feedback and satisfaction are monitored by one or more of the following ways:

- ❖ Meeting with customers, e.g. customer visits
- ❖ Customer complaints
- ❖ Customer surveys

Through our IMS, we monitor information on client satisfaction and/or dissatisfaction. Client Feedback Form are designed and used to collect such information for further analysis by the Task Force

We develop an internal customer satisfaction index, taking into consideration of such feedbacks, as our indicators for customer engagement for sustainability reporting purposes, which is to be presented in section 6.4.

5.3.4 Data Safety and Privacy

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

For the collection and disposal of wastepaper, we work with our office cleaning personnel for handling and reselling of wastepaper to recovery companies for pragmatic reasons. Every individual is responsible for shredding all papers, including confidential documents, before disposing into paper recycling boxes situated near the photocopiers and printers. Such practices established within our office provide us with the confidence that sensitive information is protected during the whole life cycle of our documents.

5.4 Partnering Our Suppliers

5.4.1 Our Approach

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

5.4.2 Supplier Selection

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

5.4.3 Supplier Review

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

5.5 Supporting for Our Community

5.5.1 Our Approach

We have been providing support to the communities. The key motivation driving all our community engagement initiatives is to enable and empower young people. By supporting young people today and helping to educate them about the world they are to inherit, our goal is to benefit not only the current generation, but also the next, in particular, giving opportunities to the underprivileged groups to excel.

We also recognize that meeting the needs of today's youth goes beyond their own education, security and well-being, extending to that of their families, homes and neighbourhoods as well. To this end, our engagement programmes also encompass financial and practical support in carefully selected communities, through fundraising and voluntary activities.

Our community initiatives are selected according to how closely they are aligned with our own community engagement goals of "enabling and empowering young people", the anticipated staff participation rate, and the tangible impact on the beneficiary. Separately, we also engage on other community initiatives on an ad hoc basis. All our business units and some of our channel partners are involved in our community engagement programmes.

In the occurrence of a crisis in our community, such as the previous SARS Pandemic and the currently on-going COVID-19 pandemic, we shall take the necessary steps and measures to ensure safety and well-being of the public. Such measures may including response to governments' call to institute measures such as safe distancing measures and contact tracing at sites and office and embrace 'work from home' arrangements to the furthest extent possible, extension of assistance to general public where possible.

6 PERFORMANCE TABLE

6.1 Energy Usage and CO₂ Emissions

Direct and indirect CO₂ emissions as measure in GHG emissions are measured in tonnes (t-CO₂) and Kilowatt Hours (kWh), from electricity and fuel consumed. The electricity and fuel we purchase are both from non-renewable sources.

Our business and function grow over time; the GHG emissions and electricity consumption vary. To ensure consistency and comparability of the GHG emission and electricity consumption measures over time, we create a GHG emission index and electricity consumption index for our performance monitoring. The index adjusts the GHG emissions and electricity consumption for the size of our activities. We normalize the amount GHG emissions and electricity consumption by the amount of our revenues which we use as a proxy of the size of our activities. The GHG emission index is measured in t-CO₂ per SGD million and the electricity consumption index is measured in kWh per SGD million.

	Performance			Target	
	2017	2018	2019	2019	2020
GHG Emission Index (t-CO ₂ / million SGD)	4.40	2.91	2.06	2.91	2.05
Electricity Consumption Index (kWh /million SGD)	7,441.61	3,481.71	2,401.60	2,464.34	2,384.79

2019 Performance

As of 2019, the GHG Emission Index stands at 2.06. Compared to the 2019 target of 2.91, the index outperforms the target by 29.2%. In reference to 2017 as our base year, the index registers a performance of 53.1% improvement.

In the same year, the Electricity Consumption Index stands at 2,401.60. Compared to the 2019 target of 2,464,34, the index outperforms the target by 2.5%. In reference to 2017 as our base year, the index registers a performance of 67.7% improvement.

We will continue to track our performance in reference to 2017 as the base year.

6.2 Employment Profile

	Performance			Target	
	2017	2018	2019	2019	2020
Male:Female ratio in senior management	100%:0% (Total=5)	100%:0% (Total=5)	100%:0% (Total=5)		
Male:Female ratio in managerial positions	74%:26% (Total = 35)	76%:24% (Total = 38)	79%:21% (Total = 39)	--	--
Male:Female ratio in non-managerial positions	89%:11% (Total = 512)	89%:11% (Total = 557)	88%:12% (Total = 550)	--	--

2019

Performance

As of 2019, the Gender Ratio (Male:Female) for senior management, managerial and non-managerial positions stand at 5:0, 31:8 and 486:64 respectively.

6.3 Employees Engagement and Training

	Performance			Target	
	2017	2018	2019	2019	2020
Average Training Hours per Employee	11.4	12.3	9.4	--	--

2019 Performance

As of 2019, the Average Training Hours per Employee stands at 9.4. In comparison to 2017 as the base year, it registers a decrease of 2.0 hours per employee.

We will continue to track the indicator in reference to 2017 as the base year.

6.4 Customer Feedback

	Performance			Target	
	2017	2018	2019	2019	2020
Customer Satisfaction Index (0-100%)	81%	82%	83%	80%	80%

2019 Performance

As of 2019, the Customer Satisfaction Index stands at 83%. In comparison to 2017 as the base year, it registers an improvement of 3% which is on target towards our goal of 80%

We will continue to track the index.

6.5 Supplier Screening Using Environmental Criteria

	Performance			Target	
	2017	2018	2019	2019	2020
Key Suppliers Screened for Sustainability Criteria (%)	35%	35%	35%	--	--

2019 Performance

As of 2019, the Key Suppliers Screened for Sustainability Criteria stands at 35%. We will continue to track this indicator.

6.6 Community Contribution

	Performance			Target	
	2017	2018	2019	2019	2020
Donation	135,711	115,012	337,608	--	--

2019 Performance

This year, our community contribution comprises 28 donations with total donation amount of 337,608.

7 GRI CONTENT INDEX

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

N.B.: AR = Annual Report, SR = Sustainability Report (i.e. this report)

GRI Reference	Disclosure	Response	
General Standard Disclosure			
Organization Profile	102-1	Name of the organization	SR Section 1
	102-2	Activities, brands, products, and services	AR Page 2 (Corporate Profile)
	102-3	Location of headquarters	AR Page 20 (Corporate Directory)
	102-4	Location of operations	AR Page 12 (Financial and Operations Review), 134 (Note 41: Segment Information)
	102-5	Ownership and legal form	AR Page 2 (Corporate Profile)
	102-6	Markets served	AR Page 12 (Financial and Operations Review), 134 (Note 41: Segment Information)
	102-7	Scale of the organization	AR Page 15 (Financial Highlights)
	102-8	Information on employees and other workers	SR Section 5.2.3
	102-9	Supply chain	SR Section 5.4, 5.4.1, 5.4.2, 5.4.3
	102-10	Significant changes to the organization and its supply chain	No significant changes
	102-11	Precautionary Principle or approach	SR Section 3.2, 3.3, 4, 4.2, 5, 5.1.1, 5.2.1, 5.3.1, 5.4.1, 5.5.1
	102-12	External initiatives	SR Section 4.4
	102-13	Membership of associations	SR Section 4.4
Strategy	102-14	Statement from senior decision-maker	SR Section 1
Ethics and Integrity	102-16	Values, principles, standards, and norms of behaviour	AR Page 21 (Statement of Corporate Governance), SR Section 3.1, 3.3
Governance	102-18	Governance structure	AR Page 21 (Statement of Corporate Governance), SR Section 3.2
Stakeholder Engagement	102-40	List of stakeholder groups	SR Section 5, 5.1, 5.2, 5.3, 5.4, 5.5
	102-41	Collective bargaining agreements	Percentage of total employees covered by collective bargaining agreements. [Refer to CSR Indicators Data] No (i.e. 0)
	102-42	Identifying and selecting stakeholders	SR Section 5
	102-43	Approach to stakeholder engagement	SR Section 5
	102-44	Key topics and concerns raised	SR Section 4.2, 5
Reporting Practice	102-45	Entities included in the consolidated financial statements	AR Page 5 (Group Structure)

GRI Reference		Disclosure	Response
	102-46	Defining report content and topic boundaries	SR Section 2.1, 2.2, 2.3
	102-47	List of material topics	SR Section 4.2
	102-48	Restatements of information	AR Page 66 (First time adoption of SFRS(I))
	102-49	Changes in reporting	AR Page 60 (First time adoption of SFRS(I))
	102-50	Reporting period	SR Section 2.1
	102-51	Date of most recent report	SR Section 2.1
	102-52	Reporting cycle	SR Section 2.1
	102-53	Contact point for questions regarding the report	SR Section 2.4
	102-54	Claims of reporting in accordance with the GRI Standards	SR Section 2.2
	102-55	GRI content index	SR Section 7
	102-56	External assurance	SR Section 2.2
Economic			
Economic Performance	201-1	Direct economic value generated and distributed	AR Page 53 (Income Statements)
	201-2	Financial implications and other risks and opportunities due to climate change	SR Section 5.1.3
	201-3	Defined benefit plan obligations and other retirement plans	SR Section 5.2.4.1
	201-4	Financial assistance received from government	Yes
Anti-corruption	205-1	Operations assessed for risks related to corruption	SR Section 4.2
	205-2	Communication and training about anti-corruption policies and procedures	SR Section 3.3
	205-3	Confirmed incidents of corruption and actions taken	No incident
Anti-competitive Behaviour	206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	No legal action
Environment			
Energy	302-1	Energy consumption within the organization	SR Section 5.1.2
	302-4	Reduction of energy consumption	SR Section 5.1.2, 6.1
	302-5	Reductions in energy requirements of products and services	SR Section 6.1
Emissions	305-1	Direct (Scope 1) GHG emissions	SR Section 5.1.2, 6.1
	305-2	Energy indirect (Scope 2) GHG emissions	SR Section 5.1.2, 6.1
	305-3	Other indirect (Scope 3) GHG emissions	SR Section 5.1.2, 6.1
	305-5	Reduction of GHG emissions	SR Section 5.1.2, 6.1
Environmental Compliance	307-1	Non-compliance with environmental laws and regulations	Yes, there are non-compliance and we have a process to oversee and address the incidents.

GRI Reference		Disclosure	Response
Supplier Environmental Assessment	308-1	New suppliers that were screened using environmental criteria	SR Section 5.4.3, 6.5
Social			
Employment	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	SR Section 5.2.4
	401-3	Parental leave	SR Section 5.2.1, 5.2.2.1, 5.2.4
Labor/Management Relations	402-1	Minimum notice periods regarding operational changes	SR Section 5.2.2
Occupational Health and Safety	403-1	Workers representation in formal joint management-worker health and safety committees	SR Section 5.2.5
Training and Education	404-1	Average hours of training per year per employee	SR Section 5.2.2.4, 6.3
	404-2	Programs for upgrading employee skills and transition assistance programs	SR Section 5.2.2.4, 6.3
	404-3	Percentage of employees receiving regular performance and career development reviews	SR Section 5.2.2.1, 5.2.2.4, 6.3
Diversity and Equal Opportunity	405-1	Diversity of governance bodies and employees	SR Section 5.2.3
Non-discrimination	406-1	Incidents of discrimination and corrective actions taken	No incident
Rights of Indigenous Peoples	411-1	Incidents of violations involving rights of indigenous peoples	No incident
Human Rights Assessment	412-2	Employee training on human rights policies or procedures	SR Section 5.2.2.1, 5.2.6
Supplier Social Assessment	414-1	New suppliers that were screened using social criteria	SR Section 5.4.1, 5.4.2, 5.4.3, 6.5
Public Policy	415-1	Political contributions	No contribution
Customer Health and Safety	416-1	Assessment of the health and safety impacts of product and service categories	SR Section 5.3.1, 5.3.3
	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Yes, there are incidents and we have a process to oversee and address the incidents
Marketing and Labelling	417-2	Incidents of non-compliance concerning product and service information and labelling	No incident
	417-3	Incidents of non-compliance concerning marketing communications	No incident
Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No complaint
Socioeconomic Compliance	419-1	Non-compliance with laws and regulations in the social and economic area	No non-compliance