

# ARION ENTERTAINMENT SINGAPORE LIMITED

(Incorporated in the Republic of Singapore)

(Company Registration Number: 199407135Z)

**SUSTAINABILITY REPORT 2022** 

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# **ABOUT THIS REPORT**

Arion Entertainment Singapore Limited (the "Company", together with its subsidiaries, the "Group", "Arion", "we", "us" or "our") is pleased to present our fifth Sustainability Report.

This report discusses the achievements and performance towards Economic, Environment, Social, and Governance ("EESG") topics, such as anti-corruption, energy, non-discrimination, local communities and customer privacy. The data presented in this report covers the Company and its subsidiaries, Inovatif Media Asia Sdn. Bhd. ("Inovatif") and Fame Harvest Limited ("FHL") during the financial year commencing 1 April 2021 to 31 March 2022 ("FY2022").

This report is prepared with reference to the Global Reporting Initiative ("GRI") Standards: Core Option and is in line with the requirements of the Singapore Exchange Securities Trading Limited ("SGX-ST") Catalist Listing Rules 711B and Practice Note 7F. The GRI Standards, which are recognised as the representation of international best practices, are chosen as the reporting framework for its robust principles and comprehensive advice. The GRI content index summarising the disclosures are included at the end of this report.

Material EESG factors are identified using below principles:



# **Stakeholders** Inclusiveness

Identifying and responding to stakeholder expectations and interests



#### Sustainability

Presenting the Group's performance in the wider context of sustainability



#### Materiality

Focusing on issues that impact the Group's operations with (i) significant economic, environmental or social impact or (ii) significant influence on the assessments and decisions of our Group's stakeholders



#### Completeness

Reflection of the material aspects of the Group to enable the stakeholders to assess the performance of the Group

Our data is reported in good faith and to the best of our knowledge. We have not sought external assurance for this report, and monitoring and verification of data disclosed in this report are performed internally by management and supervised by the Board.

We are dedicated to listening to our stakeholders' feedback on any aspect of our sustainability performance. You could reach us at <a href="http://www.egl.com.sg/contact-us.html">http://www.egl.com.sg/contact-us.html</a>.

# **BOARD STATEMENT**

Climate change, societal disruptions, data privacy, and the impact of COVID-19 pandemic are global concerns which highlight the need for businesses to recalibrate while they navigate through economic recovery as the world begins to recover from the COVID-19 pandemic. We believe that we have a part to play in finding solutions to these challenges to remain resilient in this volatile climate. Through these global uncertainties, we believe that sustainability remains integral in our strategy and long-term growth.

The publication industry continues to face significant challenges with the on-going COVID-19 pandemic in FY2022. We are in the process of transforming our business model from printed publication into digital and online publications to remain competitive in the industry and we continue to consider pressing environmental and societal issues as we progress.

Despite the ever-changing dynamic of the COVID-19 pandemic, on 14 May 2021, we announced the acquisition of a shelf company, FHL, and on 10 March 2022, FHL has completed the acquisition of Win Win Finance Limited ("WWFL"), a licensed money lender holding a money lender's license in Hong Kong. The acquisition has allowed the Group to commence its money lending business in Hong Kong and thereby reducing the Group's reliance on its existing publication business which has shown limited growth potential in the last few years. This also provides shareholders with diversified returns and potential long-term growth. The Group has also launched a website, <a href="www.smartinvestor.hk">www.smartinvestor.hk</a> for Smart Investor in Hong Kong, where articles on property, stock market and investments are freely accessible by the public.

It is our long-term commitment to conduct our business in a manner that is ethically, socially and environmentally sustainable by taking into consideration all stakeholders' interests. The Board of Directors (the "Board") oversees the management and governance of the Group's sustainability direction. The Board reviews the EESG factors identified which are material to the Group and ensures that they are monitored and managed. Sustainability issues are considered and aligned with the Group's strategic business direction.

Through our regular interaction with our stakeholders, we are able to identify and address risks or factors which could possibly have an impact on our operations. We review the EESG factors on an annual basis and monitor our progress on sustainability efforts.

As we progress towards our next phase of growth, we would like to express our utmost gratitude to our stakeholders who have participated and contributed in our journey towards sustainability. We look forward to your continuous support and partnership towards building a sustainable future together.

# **CORPORATE PROFILE**

Arion Entertainment Singapore Limited was incorporated in 1994 as Panpac Media Group Limited. Listed on the Catalist Board of the SGX-ST in 1997, the Company is an investment holding company with business activities in Malaysia and Hong Kong through its subsidiaries, Inovatif and FHL. Inovatif publishes special interest magazines and currently publishes in English and Chinese in Malaysia, while FHL is the holding company of WWFL, and the latter holds a money lender's license in Hong Kong which has expired on 24 August 2022. WWFL has commenced the process of renewing the license with the Money Lenders' Licensing Section of the Hong Kong Police Force, which is typically procedural.

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Currently, Inovatif publishes the following magazines for circulation in Malaysia.



In addition to proprietary publications, Inovatif also offers contract publishing services for 4E Journal, which is a financial magazine for members of the Financial Planning Association of Malaysia. Inovatif is also a regular media partner with several financial organisations in Malaysia in printing reading materials with financial contents for their members.

# **CORPORATE GOVERNANCE**

At Arion, the Group is committed to high standards of corporate governance, accountability, lawful acts and integrity. We acknowledge the importance of developing a sound corporate governance structure in ensuring success and sustainability of business. Our corporate governance structure comprises policies and procedures, such as the Code of Conduct Policy and Whistle-Blowing Policy, which aligns with the principles and guidelines set out in the Code of Corporate Governance 2018.

The Board oversees the development of the Group's overall corporate governance practices as well as sustainability strategies which are formalised by the senior management to ensure that the sustainability strategies align with our business objectives.



#### **Board of Directors**

- Ng Kai Man (Executive Director)
- Chou Kong Seng (Independent Non-Executive Director)
- Kesavan Nair (Independent Non-Executive Director)
- Lee Keng Mun (Independent Non-Executive Director)

#### **Nominating Committee**

- Kesavan Nair (Chairman)
- Chou Kong Seng (Member)
- Lee Keng Mun (Member)

## **Remuneration Committee**

- Lee Keng Mun (Chairman)
- Chou Kong Seng (Member)
- Kesavan Nair (Member)

# **Audit Committee**

- Chou Kong Seng (Chairman)
- Kesavan Nair (Member)
- Lee Keng Mun (Member)

# **CORPORATE INFORMATION**

## **Training and Updates for the Board**

In FY2022, there were no new appointments of directors. The Board is kept up to date on regulatory updates by the Company Secretary, as well as the current accounting standards requirements by the independent auditor. At each and every Board meeting, the Executive Director would give timely updates to the Board on business and strategy developments, highlighting all significant concerns as well as the Company's risk areas.

# **Supply Chain Management**

We work with our business partners to create a long-term supply chain for our current business model. At Inovatif, we continue to work with existing suppliers who are ISO 14001:2015 certified in printing materials and paper. We ensure that our partners value sustainability as much as us, by maximising their resource efficiency, and reducing waste. Our supply chain did not change significantly in FY2022. FHL's only subsidiary, WWFL, only commenced its operations in March 2022.

## **Memberships of Associations and Permits**

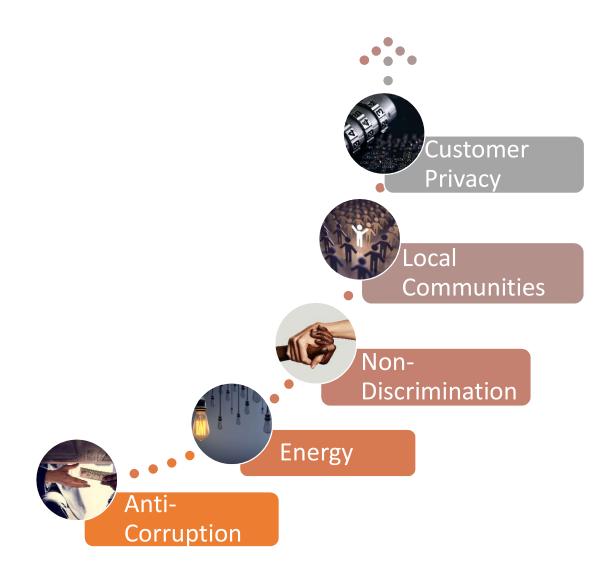
Inovatif holds the printing and publishing deeds for the publishing rights to Feng, Calibre, Smart Investor and 4E Journal magazines. WWFL is principally engaged in the money lending business and holds a money lender's license in Hong Kong, which has expired on 24 August 2022 and WWFL has commenced the process of renewing the license with the Money Lenders' Licensing Section of the Hong Kong Police Force, which is typically procedural.

# **STAKEHOLDER ENGAGEMENT**

Stakeholder	Concerns	How we engage	Expectations and Actions
Supplier	<ul><li>Communication</li><li>Quality</li><li>Eco-friendly</li></ul>	<ul><li>Supplier Assessment</li><li>Feedback</li></ul>	Complying with internal purchasing procedures and ensuring consistent communication with suppliers to ensure efficiency, quality and retention of environmental friendly suppliers.
Customers	<ul> <li>Outreach</li> <li>Value</li> <li>Confidentiality         of personal         data</li> </ul>	<ul> <li>Brochures distribution</li> <li>Formal meeting</li> <li>Feedback from sales agents and customers</li> <li>Establishment of data protection policy to safeguard customer personal data</li> </ul>	Expanding our outreach and continuing to provide exemplary services to our customers through communication and analysis of changing needs while safeguarding the personal data of our customers.
Employees	<ul><li>Opportunities</li><li>Fairness</li></ul>	<ul> <li>Communication sessions</li> <li>Yearly employee evaluations</li> <li>Whistle-blowing Policy</li> </ul>	Providing constant communication with our employees and ensuring fair and non-discriminatory practices at our workplace.
Shareholders	<ul><li>Company</li><li>Growth</li><li>Transparency</li></ul>	<ul> <li>Annual Meetings with shareholders</li> <li>Company's website – http://www.egl.com.sg</li> <li>SGXNet Announcements</li> </ul>	Conveying timely, full and credible information to shareholders through announcements and creating long term value and economic growth.
Readers	<ul><li>Good Content</li><li>Accessibility</li></ul>	<ul> <li>Feedback from readers</li> <li>Roadshows</li> <li>Information analysis and surveys</li> </ul>	Obtaining reader's feedback and translating their demographics and concerns into improved content for further outreach.
Government and Regulators	<ul> <li>Compliance with relevant regulatory and industry standards and guidelines</li> </ul>	<ul> <li>Consultations and briefings organised by key regulatory bodies</li> <li>Advice and information received from professionals</li> </ul>	Aiming to comply with policies and regulations governed by the respective authorities at all times.

# **MATERIAL TOPICS**

We have performed a materiality assessment on the EESG topics based on feedback gathered from our stakeholders. With this assessment, we had identified and prioritised the topics based on the materiality of each topic. Similar to the prior years, the EESG topics that could potentially have significant implications and influence on our business and stakeholders remained unchanged and these material topics are as listed below.



# **ANTI-CORRUPTION**

## Why is it Material

We seek to conduct our business with the highest level of integrity and transparency to preserve our stakeholders' interests and avoid reputational damage to the Group. We are committed to conducting business in accordance with all applicable laws, rules, regulations in jurisdictions in which we operate. We have zero tolerance towards bribery and corruption in any forms.

### **Management Approach**

We have a strict Code of Conduct regarding conflict of interests and fraud which is administered to all employees. The Company Secretary provides updates on the changes of relevant regulations and Companies Act on a half-yearly basis, to ensure that senior management is kept up-to-date. To protect the interests of our stakeholders, we evaluate and update our Code of Conduct twice a year. We have also put in place other measures to mitigate any possibility of corruption, such as periodic updates to the Board by senior management regarding strategic changes and performance measurements. This allows the Board to effectively monitor any potential risks which may arise and respond swiftly. For more information, we refer you to the "Corporate Governance Report" section in our FY2022 annual report.

The Group's Audit Committee ensures that whistle-blowing procedures are in place. Our Whistle-blowing Policy allows stakeholders, including employees, customers and suppliers to convey any concerns or complaints with regards to claims of irregularities, improprieties, non-compliances or wrongdoings by the Management or any employees.

The Group has in place a whistle-blowing policy to ensure independent investigations of complaints relating to fraud, corruption, possible improprieties in financial reporting, breach of law, non-compliance with the Group's Code of Conduct and business practices, and any wrongful acts by any employees of the Group, and for appropriate follow-up action.

The policy is aimed at encouraging the reporting of such matters in good faith and that staff of the Group and other persons making such reports will be treated fairly and, to the extent possible, protected from reprisal and detrimental or unfair treatment. The Group is also committed in ensuring that the identity of the whistleblower is kept confidential.

Anonymous complaints may be considered, taking into account factors such as the merits of the issues raised.

Any suspected non-compliance case and/or concern may be reported in writing and forwarded to AC Chairman by

- (i) post to 138 Robinson Road #26-03 Oxley Tower Singapore 0638898; and/or
- (ii) email to whistleblow@egl.com.sg.

The policy has a well-defined process which ensues independent investigation of issues/concerns raised and appropriate follow-up action.

All reported whistle-blowing incidents or concerns will be independently investigated and remedial actions will be taken to address the whistle-blowing incidents.

The Audit Committee has oversight and monitoring of the policy.

It is mandatory for all employees, including the Management and the Board, to declare any existing and potential interest in companies within the Group and its nature during their onboarding process, and when such conflict of interest arises. Employees will be informed of the various policies during the company orientation. Any updates to the policies or regulations will be communicated through email to the relevant employees.

#### **Performance**

In FY2022, we performed 2 internal reviews, namely one in Singapore and the other in Malaysia to assess the risks related to corruption and no material or adverse findings were noted from these reviews. There were no reported incidents of corruption and no whistle-blowing reports received in FY2022.

### **Target**

We will review and update our policies and procedures on a regular basis to ensure that they comply with standards and requirements set in place by the relevant regulatory authorities. We strive to sustain zero cases of corruption through our strong corporate governance and the preventive measures that have been put in place.

# **ENERGY**

# Why is it Material

In view of the impending threat of climate change, the Group is aware of our responsibility towards the environment and takes great responsibility towards environmental conservation. We are committed to maximise energy conservation efforts through innovative ways to reduce our carbon footprint and mitigate global warming and water shortages.

# **Management Approach**

We have undertaken several methods to improve energy efficiency and conserve water, which include the following initiatives within the Group:

- Use products with green labels and energy-efficient appliances.
- Encourage our employees to switch of all electrical appliances and lights when not in use in the office.
- Maintain the electrical appliances frequently to minimise energy wastage.
- Encourage employees to cultivate good habits of saving water, such as switching off the water tap while applying soap.
- Equip our office with water efficient appliances such as half-flush mechanisms and self-release water taps.

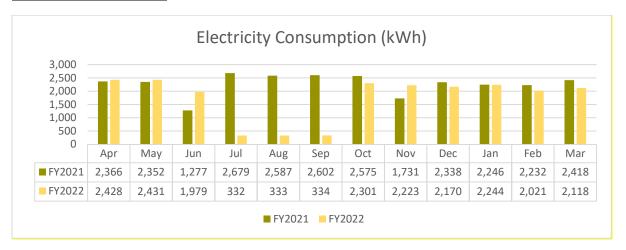
#### **Performance**

The Group had managed to achieve the target of decreasing both our electricity and water consumption by 2% in FY2022. This was not only due to the hybrid work arrangements where employees can work-from-office or work-from-home, but also intentional energy conservation efforts to use Green labelled appliances and the cultivation of good habits amongst employees to consume less water and electricity.

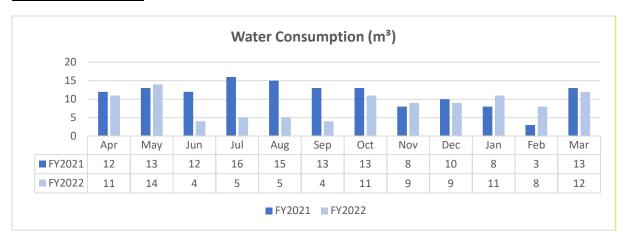
Dwelling into the numbers, total electricity consumption at Inovatif's office decreased from 27,403kWh in FY2021 to 20,914kWh (23.68%) in FY2022 and our water consumption decreased from 136m³ in FY2021 to 103m³ (24.26%) in FY2022. As there is no office for FHL, there is no water and electricity consumption. The office lease of WWFL only commenced in March 2022, and they do not have a separate meter from fellow tenants to measure electricity and water consumption. Please refer to the figures below for more information.

As WWFL commenced operations in March 2022, the Company will put in place appropriate systems to collect the relevant data for WWFL to be included in the next Sustainability Report for the financial year ending 31 March 2023.

# **Electricity Consumption**



# **Water Consumption**



# **Target**

We continue to actively promote our energy conservation initiatives to minimise our consumption of electricity and water. Our target for FY2023 would be to maintain our electricity and water consumption for Inovatif. We will monitor the electricity and water consumption for WWFL in FY2023 and set a target in the subsequent financial year.

# **NON-DISCRIMINATION**

# Why is it Material

We recognise our employees as valuable assets, and we strive to minimise employee turnover rate by enhancing our culture and creating a work environment that is fair to all employees, in terms of opportunities, rewards and labour practices. We have a diverse team of employees who come from different cultures and background. This provides different perspectives and viewpoints, enabling us to comprehend and serve readers or consumers from all backgrounds and ages.

# **Management Approach**

The Group has a thorough Human Resource Policy that guides the selection and evaluation of employees based on merit and competency. This prevents any form of discrimination based on age, gender, marital status, sexual orientation, disability, race, nationality, ethnicity, or religion. This policy also ensures that we provide equal opportunities to our employees for career progression and growth based on their performance and achievements through the annual employee performance evaluation.

With that said, our employees work very closely together in a harmonious environment, supporting one another to achieve the same goals in their workplace. We have in place a two-way communication platform where feedback can be given to or by the superiors or employees, and reviewed by the Human Resource Department if needed.

#### **Performance**

Similar to FY2021, we will continue to advocate gender equality and age diversity of our employees in Singapore and Malaysia in FY2022. All our employees are employed on a permanent basis and the tables below give information on different compositions of our employee groups.

Gender	Gender Singapore		der Singapore Malaysia		Hong Kong	
Composition	FY2022	FY2021	FY2022	FY2021	FY2022	FY2021 <sup>@</sup>
Male	1	1	4	4	2	-
Female	1	1	4	4	2	-

Age Group	Singa	pore	Malaysia		Hong Kong	
Age Group	FY2022	FY2021	FY2022	FY2021	FY2022	FY2021 <sup>@</sup>
50 and below	1	1	7	6	3	-
Above 50	1	1	1	2	1	-

@ The Group commenced its Hong Kong operations in FY2022.

Function and Condon	M	ale	Female	
Function and Gender	FY2022	FY2021	FY2022	FY2021
Non managerial employee	3	1	3	1
Senior management and managerial employee	4	4	4	4
Total	7	5	7	5

We are also pleased to report that there were zero reported incidents of discrimination for FY2022.

# **Target**

We will continue to ensure that all employees are treated without any bias, and have equal opportunities in all aspects of work to uphold our strong culture of non-discrimination in the workplace. We will strive to maintain our record of zero reported incidents of discrimination in FY2023.

# **LOCAL COMMUNITIES**

# Why is it Material

We acknowledge our social responsibility to the local communities as they play an important and unique role in ensuring success in the initiatives we undertake. We are committed to giving back to the communities by supporting and bringing positive contributions as we strive to be a business that focuses on more than just profits and to be responsive to the needs of different local communities, to create shared value for all, and to help our local communities grow sustainably.

# **Management Approach**

The Group strives to produce content that promotes positive influence in the community. Inovatif publishes content which raises awareness about the different social groups and their backgrounds, which includes business, investing, health and wellness, culture, arts and family relationships, covering a wide range of local culture and relevant societal issues. These publications aim to educate readers and for them to gain insights on various issues in the local communities.

We review feedback from our readers seriously to better understand their needs and overall satisfaction towards our magazines. Additionally, we work alongside financial planners and related professionals to provide financial literacy and investment knowledge to our readers.

#### **Performance**

Due to the impact of COVID-19, Smart Investor magazine readership has been affected as many bookstores and newsstands have either closed down or converted its magazine shelves to groceries displays (mainly in newsstands) to maintain relevant as essential stores during the various Movement Control Orders ("MCOs") instituted by the Malaysian Government. The impact of the MCOs and the closures of magazine sections have reduced readership by about 50% in FY2021. For FY2022, the readership of Smart Investor magazine decreased by approximately 60% as compared to FY2021 due to MCOs coupled with a change of newsstand distributor who has lesser outlets for distribution, as the previous distributor had closed down. The readership for Feng and Calibre has increased by approximately 25% due to increased circulation of magazines by the Public Mutual Fund.

We have also been supporting events that promote business and financial literacy throughout the years. In FY2022, we continue to be the media partner for events such as Malaysian Investor Relation Awards, Financial Planning Symposium, Federation of Investment Managers Malaysia Annual Convention as well as other related business events and seminars.

We also seek to create long-term benefits for our communities through recruitment from our local talent network and engaging local suppliers. When organising and planning events for our clients, we maintain our outreach to local communities through constant lookout for local talents and resources in delivering services to our clients.

## **Target**

By gradually migrating to digital and online publication in Hong Kong, we will continue to produce and offer contents that are relevant, valuable, and influential to society, as well as grow our readership across Malaysia in FY2023 via marketing and promotions.

# **CUSTOMER PRIVACY**

# Why is it Material

With rapid technological advances, we acknowledge the increased concerns about the collection and utilisation of personal data received during the course of our business. We are committed to protect the privacy and security of the personal data of our customers.

### **Management Approach**

We are entrusted by the customers to handle and store their personal data in a professional manner. We continue to comply with personal data protection regulations such as the Personal Data Protection Act ("PDPA") of Malaysia. We constantly remind our employees that the use of personal data for inappropriate purposes is strictly prohibited. We ensure that our employees are updated of any changes in the PDPA by providing training on a regular basis.

To boost customers' confidence, we have our Data Protection Policy, which serves as a guideline for our employees in personal data handling and processing. The Data Protection Policy is reviewed regularly and updated according to the changes in PDPA when necessary.

All information is stored in highly secured systems and is password protected with restricted access only to authorised personnel of the Group. We also have data destruction procedures in place for information that is no longer needed. We acknowledge the need to constantly improve security systems to prevent the loss of personal data and to form solutions should data breaches occur.

#### **Performance**

We are delighted to report that no complaints about breaches of customer privacy from external parties or regulatory agencies were received in FY2022. Customer data leaks, thefts, or losses were also not discovered by management.

#### **Target**

We will continue to appropriately manage customer personal data in a secured operational environment. Our target for FY2023 would be to maintain zero incidents of customer privacy breaches. We will send our employees for training in the event of changes in regulations.

# **GRI CONTENT INDEX**

GRI Standard	Disclosure	Page Reference and Reasons for Omission, if applicable				
GENERAL DISCI		·				
	Organisational Profile					
	102-1 Name of the organisation	Cover Page				
	102-2 Activities, brands, products, and services	Pg. 6				
	102-3 Location of headquarters	Singapore				
	102-4 Location of operations	Pg. 5 and 6				
	102-5 Ownership and legal form	Pg. 5 and 6				
	102-6 Markets served	Pg. 5 and 6				
	102-7 Scale of the organisation	Pg. 15 and 16				
	102-8 Information on employees and other workers	Pg. 15 and 16				
	102-9 Supply chain	Pg. 8				
	102-10 Significant changes to the organisation and its supply chain	N.A				
	102-11 Precautionary principle or approach	Pg. 3 and 4				
	102-12 External initiatives	Pg. 17 and 18				
	102-13 Membership of associations	Pg. 8				
	Strategy					
	102-14 Statement from senior decision maker	Pg. 4				
	Ethics and Integrity					
	102-16 Values, principles, standards, and norms of behaviour	Pg. 5				
	Governance					
GRI 102: General	102-18 Governance structure	Pg. 7				
Disclosures	Stakeholder Engagement					
2016	102-40 List of stakeholder Groups	Pg. 9				
	102-41 Collective bargaining agreements	N.A				
	102-42 Identifying and selecting stakeholders	Pg. 9				
	102-43 Approach to stakeholder engagement	Pg. 9				
	102-44 Key topics and concerns raised	Pg. 10				
	Reporting Practice					
	102-45 Entities included in the consolidated financial statements	Annual Report				
	102-46 Defining report content and topic boundaries	Pg. 3				
	102-47 List of material topics	Pg. 10				
	102-48 Restatements of information	N.A				
	102-49 Changes in reporting	N.A				
	102-50 Reporting period	Pg. 3				
	102-51 Date of most recent report	31 August 2021				
	102-52 Reporting cycle	Pg. 3				
	102-53 Contact point for questions regarding the report	Pg. 3				
	102-54 Claims of reporting in accordance with the GRI Standards	Pg. 3				
	102-55 GRI content index	Pg. 20 and 21				
	102-56 External assurance	No external assurance was				
		sought for FY2022				

# **GRI CONTENT INDEX (CONT'D)**

GRI Standard	Disclosure	Page Reference and Reasons for Omission, if applicable		
MATERIAL TOPICS				
Anti-corruption				
GRI 103:	103-1 Explanation of the material topic and its boundaries	Pg. 11 and 12		
Management	103-2 The management approach and its components	Pg. 11 and 12		
Approach 2016	103-3 Evaluation of the management approach	Pg. 11 and 12		
	205-1 Operations assessed for risks related to corruption	Pg. 11 and 12		
GRI 205: Anti- corruption	205-2 Communication and training about anti-corruption policies and procedures	Pg. 11 and 12		
	205-3 Confirmed incidents of corruption and actions taken	Pg. 11 and 12		
Energy				
GRI 103:	103-1 Explanation of the material topic and its boundaries	Pg. 13 and 14		
Management	103-2 The management approach and its components	Pg. 13 and 14		
Approach 2016	103-3 Evaluation of the management approach	Pg. 13 and 14		
	302-1 Energy consumption within the organisation	Pg. 13 and 14		
CD1 202 F	302-2 Energy consumption outside of the organisation	N.A		
GRI 302: Energy	302-3 Energy intensity	Pg. 13 and 14		
	302-4 Reduction of energy consumption	Pg. 13 and 14		
	302-5 Reductions in energy requirements of products and services	Pg. 13 and 14		
Non- Discrimination	n			
GRI 103:	103-1 Explanation of the material topic and its boundaries	Pg. 15 and 16		
Management	103-2 The management approach and its components`	Pg. 15 and 16		
Approach 2016	103-3 Evaluation of the management approach	Pg. 15 and 16		
GRI 406: Non- Discrimination	406-1 Incidents of discrimination and corrective actions taken			
<b>Local Communities</b>				
GRI 103:	103-1 Explanation of the material topic and its boundaries	Pg. 17 and 18		
Management	103-2 The management approach and its components	Pg. 17 and 18		
Approach 2016	103-3 Evaluation of the management approach	Pg. 17 and 18		
GRI 413: Local Communities	413-1 Operations with local community engagement, impact assessments, and development programs	Pg. 17 and 18		
Customer Privacy				
GRI 103:	103-1 Explanation of the material topic and its boundaries	Pg. 19		
Management	103-2 The management approach and its components	Pg. 19		
Approach 2016	103-3 Evaluation of the management approach	Pg. 19		
GRI 418: Customer Privacy	413- Substantiated complaints concerning breaches of customer privacy and losses of customer data	Pg. 19		