



# Advancing Towards the Next Phase

Annual Report 2020



# SUSTAINABILITY REPORT

## BOARD STATEMENT

We are pleased to present the annual Sustainability Report of K LW Holdings Limited (“**KLW**”, the “**Company**”, and together with its subsidiaries, the “**Group**”) for our financial year ended 31 March 2020 (“**FY2020**”).

Recognising the importance of sustainability, the Board of Directors (“**Board**”) leads the sustainability efforts of the Group. The Board has considered sustainability issues as part of its strategic formulation, determined the material economic, environmental, social and governance (“**EESG**”) factors relevant to its business and overseen the management and monitoring of these material EESG factors.

In defining our reporting content, we have applied the Global Reporting Initiative (“**GRI**”) Standards by considering the Group’s activities, impact and substantive expectations and interests of its stakeholders. For reporting quality, we observed the principles of balance, comparability, accuracy, timeliness, clarity and reliability.

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

## REPORTING PERIOD, SCOPE AND FRAMEWORK

This report is issued on an annual basis (most recently on 31 August 2019) and has been prepared with reference to the GRI Standards: Core option, and on a “comply or explain” basis in accordance with Rule 711B and Practice Note 7F of the Singapore Exchange Securities Trading Limited (“**SGX-ST**”) Section B: Rules of Catalist (“**Catalist Rules**”). We have chosen to report using the GRI Standards because it is an internationally recognised sustainability reporting framework that covers a comprehensive range of sustainability disclosures. Moreover, the structured framework promotes reporting a full and balanced picture of the material EESG factors affecting the Group and the management of its impact.

Corresponding to the GRI Standards’ emphasis on materiality, this report highlights the EESG related initiatives carried out throughout the 12-month period, from 1 April 2019 to 31 March 2020 by the Group’s Doors Business. Further information on the Group’s activities, products, brands and services can be found in the “Our Businesses” section of this Annual Report.

While the Group has expanded into property investment and development business, this report has not included information on our property business. As announced on 13 May 2020, the Group has acquired land in Jakarta, Indonesia in May 2019 but has yet to commence operation as of 31 March 2020. Further, the Group is in the final phase of evaluating the best commercial options available for Lincoln Square Carlton, a freehold building in Melbourne, Australia. Further details for which is set out under the “Chairman’s Statement” section of this Annual Report.

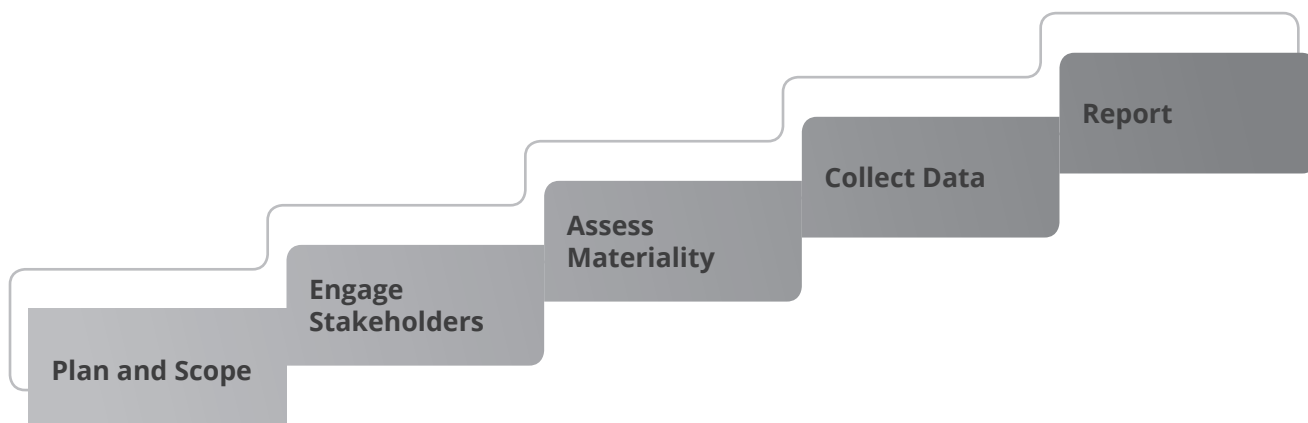
## Feedback

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

As part of our conservation efforts, no hard copy of this report is printed. We have uploaded a digital copy on our website at [www.klw.com.sg](http://www.klw.com.sg).



# SUSTAINABILITY REPORT

## Our Sustainability Approach








## Stakeholder Engagement and Identification of Material ESG Factors

An important starting point in our sustainability journey is to identify our stakeholders and the material ESG factors relevant to our business. The interests and requirements of key stakeholders, who have a material impact on the success of the Group's business and operations, are also taken into account when formulating corporate strategies. These key stakeholders include, but are not limited to board of directors, employees, customers, suppliers, the investing public, local government and local communities. We adopt both formal and informal channels of communication to understand the needs of key stakeholders, and incorporate these into our corporate strategies to achieve mutually beneficial relationships. The following sets out our engagement platforms with our stakeholders:

Stakeholders	Engagement Platforms	Frequency	Topics Discussed / Key Concerns raised
 <b>Board of Directors</b>	Board Meetings	Quarterly	Financial performance, policies and strategies and annual budgets
	Board Papers		
	Board lunches		
 <b>Employees</b>	Staff Appraisal	As and when, and annually	Employee compensation and benefits, personal developments and performance appraisal. No reports received for whistleblowing for FY2020
	Staff bonding sessions & whistleblowing policy		
	Employee Sustainability Report Feedback Form	As and when	Feedback on content, style, format of Sustainability Report

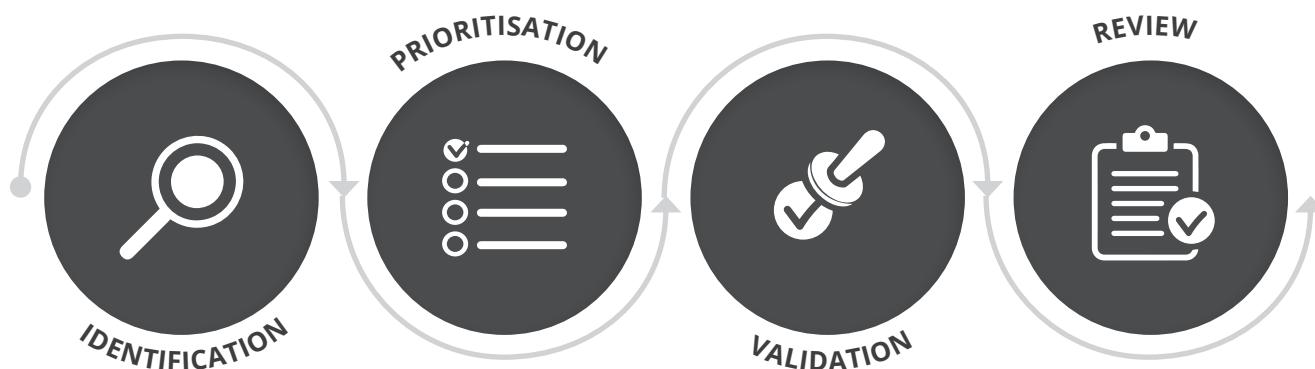
# SUSTAINABILITY REPORT

Stakeholders	Engagement Platforms	Frequency	Topics Discussed / Key Concerns raised
 <b>Customers</b>	Face-to-face meetings Email feedback Customer satisfaction questionnaire	As and when, and annually	Product quality level, punctuality of shipment and timely submission of quotation
 <b>Suppliers and Service Providers</b>	Face-to-face meeting Vendor Assessment	As and when	Delivery performance and Quality performance
 <b>Investors / Shareholders</b>	Annual General / Extraordinary General Meeting Annual Report Group's website	As and when, and annually	Financial performance and strategic planning
 <b>Local Government</b>	Regular reporting Inspections E-mail / Circulars Survey	Annually	Regulatory and compliance matters
 <b>Local Communities</b>	Sponsorship for local town council	As and when	Donation for local union activities

# SUSTAINABILITY REPORT

## Materiality Assessment

Our sustainability process begins with the identification of relevant ESG factors, taking into consideration their relevance to the business, strategy, business model and key stakeholders. Relevant ESG factors are then prioritised to identify material ESG factors which are subject to validation by our Board. The end result of this process is a list of material ESG factors to be disclosed in this report. The process described is shown below:



We conducted a materiality assessment during the year and incorporated inputs from the stakeholder engagements. A materiality review is conducted every year. To determine if an ESG factor is material, we assessed its potential impact on the economy, environment, society and the influence on the stakeholders. ESG factors were identified and prioritised through internal workshops, peer reviews and social impact assessments at site level. Based on the materiality assessment and feedback from our stakeholders, we have identified the ESG factors which are material to the Group in FY2020.

Applying the guidance from GRI, we have identified the Group’s material ESG factors. For this year, we have added one environmental factor, disposal and management of waste and one social factor, socioeconomic compliance.



# SUSTAINABILITY REPORT

## Economic

### Economic Performance

KLW firmly believes that focusing on financial sustainability is critical and we are fully committed to the highest standards of corporate governance. The Group's basic principle is that long-term profitability and shareholder value is ensured by taking into account the interests of stakeholders, such as shareholders, employees, suppliers and society as a whole. For FY2021, KLW will remain cautious with regards to market conditions and will continue to be vigilant in managing costs and improving operational efficiencies.

For detailed financial results, please refer to the following sections in this Annual Report:

- Operational and Financial Review; and
- Financial Statements.

### Anti-Corruption

At KLW, we do not tolerate any form of corruption. This has been made clear to all of our employees, our suppliers and our business partners. A dedicated whistleblowing communication channel to the Audit Committee Chairman via email is made available to anyone who wants to report any anti-business ethics issue on a confidential basis. Any report of corruption is escalated to the attention of senior management.

We have achieved our target set in FY2019, which was to maintain zero incidents of corruption. For FY2021, we will maintain our targeted goal and conduct regular review on the policies regarding whistleblowing and anti-corruption.

## ENVIRONMENTAL

### Environmental Compliance

Regular activities including inspection and testing were performed in KLW to ensure compliance with environmental and safety regulations. Throughout FY2020, the following activities took place and were monitored by our external service providers:

#### KLW Malaysia plant environmental monitoring (KLW Wood Products (M) Sdn Bhd):

Date	Details / Regulation
19 August 2019	Stack emission monitoring for dust collector 3, 4, 5 & 6 and spray booth No. 3 & 4
14 November 2019	Environmental Noise Monitoring
14 November 2019	Environmental Air Monitoring
20 November 2019	Sewage Monitoring
21 December 2019	Annual Examination & testing of Local Exhaust Ventilation ("LEV")
30 December 2019	Noise Risk Assessment (Previously initial Noise Exposure Monitoring)
29 February 2020	Chemical Exposure Monitoring

# SUSTAINABILITY REPORT

## KLW China plant environmental monitoring (Dongguan Lebex Doors Co. Ltd.)

Date	Details / Regulation
13 January 2020	Submission of Environment Testing Report
16 August 2019	ISO 14001:2015 Certification

We have achieved the target we set last year, which was to record no (FY2019: nil) significant fines or non-monetary sanctions for non-compliance with environmental laws or regulations for both KLW Malaysia and China operations. We aim to maintain zero incidents of non-compliance in the upcoming years.

### Disposal and Management of Waste

Globally, wastage has increased significantly over the years. Here at KLW, we aim to minimise wastage. The amount of waste would continue to rise at an unsustainable rate without recycling efforts in an environmentally friendly manner. Our wastes are carefully handled by an accredited third-party service provider so that it can be treated and processed before being responsibly recycled. We have ISO-recognised procedures in place to improve reduce waste such as:

- Recycle by-products and/or wastes;
- Avoid using hazardous raw materials;
- Substitute raw materials by using less hazardous varieties;
- Modify processes so that by-products or wastes could be reduced; and
- Reduction of unnecessary waste as part of our conservation efforts.

We have improved our effective disposal percentage as follows:

**35%**

of 137,162 kg of waste  
generated in FY2019

**72%**

of 57,062 kg of waste  
generated in FY2020

We have achieved our goal to minimise the potential impact of wastage to the environment by putting in place proper processes for waste disposal responsibly. We aim to continue to put in place proper processes in handling waste disposal in FY2021.

# SUSTAINABILITY REPORT

## Supplier Environmental Assessment

KLW will continue to reduce its environmental impact and to encourage its stakeholders, such as suppliers and trading partners, to meet the same expectations. The Group also performs annual supplier assessment on their vendors to verify that they are providing high quality and green products. We have established our Forest Stewardship Council ("FSC") policy regarding FSC chain of custody for central office and multiple sites. Our procurement manager is responsible for purchasing of raw materials, for verifying the validity and scope of the supplier's FSC certificate and for verifying purchase documents. KLW purchased FSC Certified medium-density fibreboard, particleboard, wooden timber, veneer and FSC controlled wooden timber and veneer for its FSC production.

In FY2020, 100% of the Group's new suppliers (FY2020: 8, FY2019: 24) were screened under the Environmental Requirement Guidelines. Through this process, we emphasise the Group's requirements and policy as follows:

**ENVIRONMENTAL REQUIREMENT GUIDELINES**

In line with the World's aspiration in protecting the environment, KLW WOOD PRODUCTS [M] SDN BHD seeks to implement, promote and maintain an Environmental Management Systems in mitigating the impacts created by our operations with relation to the manufacturing of wooden doors and fire retardant doors. We therefore seek full cooperation from your esteemed company in realizing our endeavor. We shall take the opportunity to communicate our environmental policy as below.

**Our Environmental Policy**

*We, the management and staff of KLW WOOD PRODUCTS [M] SDN BHD are committed to:-*

- G**enerate our best endeavor towards pollution prevention.
- R**espect and comply with legislative and customers' requirements related to environmental issues.
- E**stablish appropriate objectives and consistently review for continual improvement.
- E**nsure that our environmental policy is communicated among our employees and is made available to all interested parties.
- N**urture environmental awareness through teamwork.

Since we started screening our suppliers in 2015, as of FY2020 a total of 49 (FY2019: 49) suppliers (100% of the screened suppliers and 40% of our total suppliers) have passed our assessment. For KLW China plant, there are two suppliers (FY2019: 2) who signed on the environmental policy.

Our plants are both ISO9001 and ISO14001 certified. Our products do not possess any materials which may qualify it as hazardous waste and zero (FY2019: nil) environmental hazards have been reported or known. All new chemical brought into factory will be carefully managed by the related person in charge regarding hazard warning labels, CDS, PPE, storage and handling.

We have achieved our goal set in FY2019 to maintain zero incident of non-compliance. In FY2021, we will continue the supplier assessment on a yearly basis and ensure that the suppliers are selected carefully in the upcoming years taking into consideration their adherence with environmental requirements.



# SUSTAINABILITY REPORT

## Local Purchases

Most of our accessories are sourced locally. Our local purchases include accessories such as abrasive, cutter, glass, glue, hardware, oil, packaging, paint, tools, bearing, belt, motor and spare parts. We target to continue the current procurement practice.

**China**

**100%**

(FY2019: 95%) of our accessories purchased in the past 6 months were sourced locally

**Malaysia**

**90%**

(FY2019: 99%) of our accessories purchased in the past 6 months were sourced locally

## SOCIAL

### Occupational Health and Safety

We are committed to safeguarding our employees' health and safety against any potential workplace hazards. The focus on health and safety is important for KLW to achieve outstanding performance. It is a fundamental right for our workers to be able to work in a safe environment. By doing so, not only is the health of our employees safeguarded, our overall productivity also increases, enabling us to deliver the best goods and services to our customers. From implementing job safety guidelines and procedures to conduct rigorous safety trainings, we are committed to provide a hazard-free workplace to ensure the well-being of both our employees and the environment.

KLW employs a variety of measures to ensure the health and safety of all our staff. Throughout the year, we have conducted the following training to our employees:

#### KLW Malaysia

- Procedure Disposed Schedule Waste (Glue)
- HR training on employees' benefits
- HR, Safety & Health and Quality for new workers
- Safety and Health training for emergency event and safety, fire drill, accident reporting and investigation procedure, safety shoes
- Quality Assurance Training on handling Equipment Water Level, MC Meter Delmhorst, Testo, & Glass Meter, Handling AQL - Tolerance Defect Glass, introduction Process Door (Full Board Grooving, FD30, Cramping Engineered, HF), fire door briefing
- Production training on carton box usage, PPE/ Housekeeping/ Safety Shoes/ Safety Machine/ Yellow Line/ Forklift, First Piece, Safety, Pallet Truck, Rest Time
- Warehouse training on stocktake procedure, workflow briefing

#### KLW China

- Employee's roles and responsibilities in safety
- Employee Manual and Rules
- Annual Safety Production Standards
- Occupational Hazard Manual
- Use of personal labour protection equipment
- Handling of waste pipe procedure
- Job descriptions and responsibilities
- Company organisational structure
- Introduction of ISO 9001 and ISO14001 and their requirements
- Fire operations and emergency handling procedures
- Prevention of work injuries
- Equipment maintenance and operations instructions
- Corrective action control procedures
- Fire drill exercise
- Documents and records management

# SUSTAINABILITY REPORT

On a monthly basis, key performance indicators on safety and health were reported and tabulated by the Health and Safety Officer. These reports track and monitor the injuries and accidents on site. Unfortunately, cases were recorded and we did not achieve our target, which was an accident frequency rate of zero as well as zero cases of work-related fatalities in the upcoming years. This is beyond the Group's control and despite the reminders and trainings provided by the Management. In FY2020, there were 28 (FY2019: 17) accident cases at our operations. All 28 cases were reported to Jabatan Keselamatan dan Kesihatan Pekerjaan Negeri Johor ("JKKP") @ Department of Safety & Health. There were 22 minor injuries and 6 major injuries. Following each accident, the management evaluated the situation and sought to implement corrective actions to mitigate recurrence of such accidents. Health and Safety Officer will verify the implementation and effectiveness of such corrective action. There were no accidents reported at our China plant for FY2020, which is an improvement from the one case reported in FY2019.

We will continue to stress on workplace safety at all times, providing safety training and aim for a reduction in workplace accident rate for FY2021.

## A Memo sent to all our employees relating to COVID-19

Ref. No. : MEMO / ADM / 203  
Date: 13th June 2020  
MEMO

To All KLV Employees:

PER: RECOVERY MOVEMENT CONTROL ORDER (PKPP) FROM 10TH JUNE 2020

Referring to the Prime Minister's Special Message on 7th June 2020, the Malaysian Government allows industry and business activities to operate 100% as a whole from 10th June 2020. All employees MUST be present to work as usual and must comply with the following conditions:

1. Sanitation and cleaning process will be carried out three (3) times a day as usual. Employees are required to make a sanitation process on their respective equipment / tables / chairs before starting work & before returning to work.
2. The use of face masks by every worker in public areas is mandatory.
3. 1m social distance must be practiced in any work area.
4. Canteen operators and canteen workers are allowed to work. Food and beverage in the form of packaging only.
5. Workers are not allowed to leave the factory area during the allowed break time except Friday for local male workers selected in the list of mosques. The employee must provide proof and send the evidence to Mrs. Rozita every Thursday or Friday before 10.00am for the record. Security guards will provide relief according to the list provided. Employees must also fill out an exit pass with approval before leaving the factory area.
6. All employees are encouraged to make the sanitation process for their vehicles according to the appropriate procedures.
7. As directed by MKN, all employees must download and register the MySejahtera application into their respective mobile phones for confirmation of close contact.
8. All employees MUST follow the following procedures when entering work and returning to work / leaving the factory:
  - a. When entering work:
    - The vehicle must stop in front of the main entrance to sanitise the outside of the vehicle.
    - Employees should park their vehicles in the parking lot and pick up items and go to safety huts for hand sanitation, temperature records, scan employee cards and change new face mask.
  - b. On the way back to work / leaving the factory:
    - Employees must sanitise hands, record temperatures, scan employee cards, remove face mask and take new facemask.
    - Take their respective vehicles and exit the factory area.
  - c. Employees who disobey this procedure will be subject to disciplinary action as follows:
    - First - First Warning Letter
    - Second - Final Warning Letter
    - Third - Termination of Service

Please take care of your safety together and your cooperation is greatly appreciated. At the same time, we are also waiting for the Government to announce and update any new notices related to COVID-19.

Thank you.

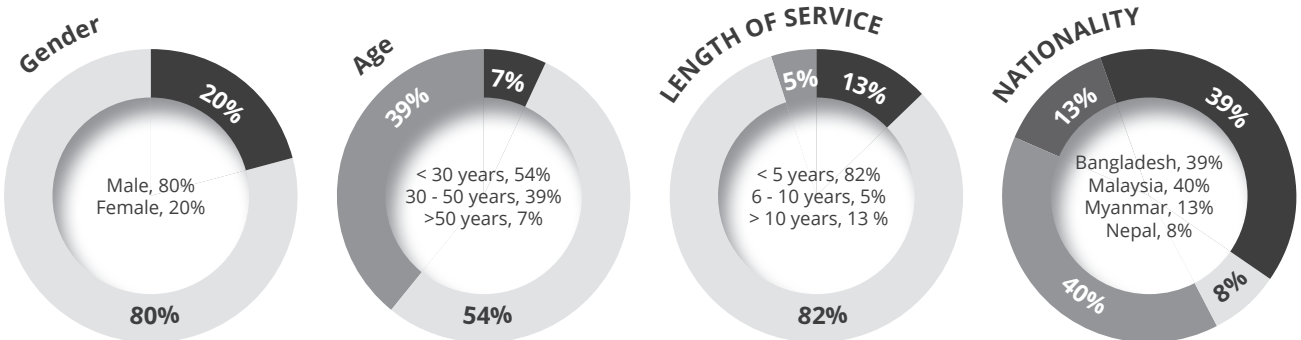
# SUSTAINABILITY REPORT

## Diversity and Equal Opportunity

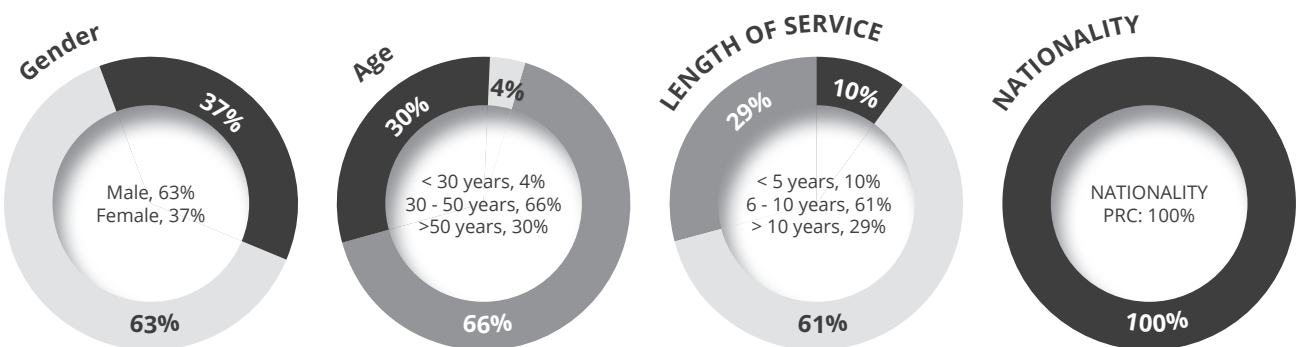
KLW does not discriminate according to their race, age, gender, religion, ethnicity, facial attractiveness, physical impairments, sexual preference, political viewpoints or nationality. Based on the group's human resource records, we have a total of 358 (FY2019: 328) employees in the Malaysia plant and 161 (FY2019: 223) employees in the China plant as of FY2020. During the year, there have been no cases (FY2019: nil) concerning any discrimination or unfair employment practices. We will continue to uphold the principle of equal opportunities and respect the rights of our people.

The Group considers its employees the most valuable asset and offers them fair and competitive remuneration packages. Discretionary incentives are granted to eligible employees based on the performance of the Group and contribution of individual employees. Contributions to retirement benefit schemes are offered as part of the remuneration package. Remuneration policies and packages are reviewed regularly to ensure that compensation and benefits are in line with the market, thus helping the recruitment and retention of talents.

### Malaysia



### China



# SUSTAINABILITY REPORT

15% of our employees in Malaysia are subject to an agreement between our subsidiary, K LW Wood Products (M) Sdn Bhd and the Timber Employee Union of Malaysia.

Throughout the year, our Human Resource department has organised events for the Group. These celebrations has allowed everyone a chance to take a break from work and serves as a platform for them to bond with each other. In FY2020, three employees were awarded 'Best Performance' in our Malaysia Plant. 'Best Performance' are given to employees who have not taken Sick Leave, Accident Leave, Absent, No Pay Leave, No Pay Holiday Leave, Time-off, Early out and have been punctual. We will continue to recognise the Best Performance award in our Malaysia Plant.

In our Malaysia plant, activities were held to promote cohesiveness and inclusiveness within the workplace such as Annual Dinner and Dance, and celebration of Hari Raya Aidilfitri and Deepavali.

In our China plant, the Company had provided birthday gifts, Chinese New Year red packets and Women's Day gifts to the employees. K LW China plant also organised activities like Company annual Dinner and Dance and celebration for Women's Day.

In FY2020, we have achieved the goal set in FY2019 of zero incident of complaint on discrimination and we will continuously aim to maintain zero incident of complaint on discrimination in FY2021.

## Socioeconomic Compliance

We pride ourselves in having good corporate governance and observing compliance with applicable laws and regulations. The Group is committed to conduct the business with integrity and to safeguard the interest of all our stakeholders, both internal and external.

The Group complies with and puts in every effort in complying with the relevant laws and regulations that include the Occupational Safety and Health Act 1994, Factory and Machinery Act 1957, Employment Act 1955 and Recovery Movement Control Order ("RMCO").

We have achieved the target we set last year, which was to record no significant fines and non-monetary sanctions for non-compliance with the applicable laws and regulations reported in FY2020 for both Malaysia and China plants. We aim to maintain zero incidence of non-compliance with the applicable laws and regulations in the relevant jurisdictions of operations in FY2021.

### Membership

- Malaysian Wood Moulding & Joinery Council
- Forest Stewardship Council (FSC)
- Malaysian Timber Council
- Lembaga Perindustrian Kayu Malaysia Perakuan Pendaftaran

## GOVERNANCE

### Corporate and Sustainability Governance

At K LW, we believe that strong governance is the key to a sustainable business. Throughout FY2020, we continue to comply with the Code of Corporate Governance and achieved the target we set last year. Please refer to the "Report on Corporate Governance" section of this Annual Report for more information on the governance structure of the Group, including committees of the Board of Directors and their roles and responsibilities.

# SUSTAINABILITY REPORT

It is a continual challenge to successfully manage the environmental and social issues. K LW has incorporated this into our business model and implemented sustainable and responsible practices throughout the Group. Our products and services meet relevant safety and environmental requirements demanded by our customers and the regulatory bodies.

K LW pays strict attention to enforce good labour practices in all our operations. The Group provides various training opportunities for continued employee development and this is reflected in the quality and delivery of our products and services. We value our relationships with our clients and the wider community in which we operate and these relationships have helped us through the challenging times in the past. K LW strongly believes that in the long run, these efforts will have a positive impact on our economic performance.

Similar in the past, we will continue to comply with the Code of Corporate Governance and meet all requirements that are expected of us by our stakeholders in FY2021.

## **Risk Management**

Risk Management (“RM”) is an integral part of good corporate governance as well as resource management. K LW has a thorough and comprehensive RM framework to identify and manage its risks and exposures in an integrated, systematic and consistent manner. For detailed disclosure on RM, please refer to the “Report on Corporate Governance” section in this Annual Report.

In FY2020, we reviewed the RM policies to ensure all relevant risks are identified, communicated and addressed timely and accomplished our target last year. We will perform the same review in FY2021.

## **Business Ethics and Compliance**

In respect of hiring personnel, we take any possibility of conflict of interest into serious consideration. Our code of conduct clearly spells out K LW’s expectations from our staff and consequences if any of the rules are violated or standards are not met. In addition, we also have clear and fair grievance procedures.

All of our staff are reminded of the importance of upholding the highest standards when it comes to business ethics. We have posters and memos reminding everyone on the importance of ethics clearly displayed in public areas so that employees from all level are fully aware that compliance with rules and regulations is a key part of running a responsible business.

The Group regularly updates relevant staff with development in international and local regulations. K LW complied fully, in all material aspects, with all environmental rules and regulations, anti-competitive behaviour laws and all requirements on health and safety.

Cybersecurity and data privacy are important not just for compliance, but in safeguarding both our data and that of our customers. K LW takes measures to guard against cyber risks and protecting the confidential information for both our internal and external stakeholders. This also applies to our employment process where the privacy of all applicants is safeguarded and access to personal data is restricted to authorised persons on a need-to-know basis.

For FY2020, we have achieved the target we set last year. There were no (FY2019: nil) significant fines or non-monetary sanctions for non-compliance with laws and regulations. Our target in FY2021 is to ensure that all allegations received are promptly addressed and to maintain zero incidents of non-compliance in the upcoming years.

# SUSTAINABILITY REPORT

## GRI CONTENT INDEX

GRI Standard	Disclosure	Page reference / Description
<b>GRI 101: Foundation 2016</b>		
<b>GENERAL DISCLOSURE</b>		
<b>GRI 102: General Disclosures 2016</b>	102-1	Name of organisation KLW Holdings Limited
	102-2	Activities, brands, products and services Our Businesses pages 2 to 3
	102-3	Location of headquarters Corporate Information
	102-4	Location of operations Our Businesses pages 2 to 3
	102-5	Ownership and legal form Corporate Information
	102-6	Markets served Our Businesses pages 2 to 3
	102-7	Scale of the organisation Chairman's Statement and operational and financial review section; pages 5 to 9 Diversity and Equal Opportunity, pages 52 to 53
	102-8	Information on employees and other workers Diversity and Equal Opportunity, pages 52 to 53
	102-9	Supply chain Supplier Environmental Assessment, pages 49 to 50
	102-10	Significant changes to the organisation and its supply chain Reporting period, Scope and Framework, page 43
	102-11	Precautionary Principle or approach KLW supports the intent of the Precautionary Principle, but has not expressed a specific commitment
	102-12	External initiatives Sustainability Approach, page 45
	102-13	Membership of associations Membership, page 53
	102-14	Statement from senior decision maker Board Statement, page 43
	102-16	Values, principles, standards and norms of behaviour Business Ethics and Compliance, page 54
102-18	Governance structure Report on Corporate Governance, pages 14 to 42	
102-40	List of stakeholder groups Sustainability Approach, pages 44 to 45	
102-41	Collective bargaining agreements Diversity and Equal Opportunity, pages 52 to 53	
102-42	Identifying and selecting stakeholders Sustainability Approach, pages 44 to 45	
102-43	Approach to stakeholder engagement Sustainability Approach, pages 44 to 45	
102-44	Key topics and concerns raised Sustainability Approach, pages 44 to 45	
102-45	Entities included in the consolidated financial statements Notes to the financial statement, pages 99 to 101	

# SUSTAINABILITY REPORT

## GRI CONTENT INDEX

GRI Standard	Disclosure	Page reference / Description	
	102-46	Defining report content and topic boundaries	Reporting period, Scope and Framework, page 43
	102-47	List of material topics	Sustainability Approach, page 46
	102-48	Restatement of information	There are no restatements made in respect of information given in previous reports.
	102-49	Changes in reporting	There have been no significant changes from previous reporting periods in the list of material EESG factors and boundaries.
	102-50	Reporting period	Reporting period, Scope and Framework, page 43
	102-51	Date of most recent previous report	31 August 2019
	102-52	Reporting cycle	Annually
	102-53	Contact point for questions about the report	Feedback, page 43
	102-54	Claims if reporting in accordance with the GRI Standards	Reporting period, Scope and Framework, page 43
	102-55	GRI content index	GRI Content Index, pages 55 to 56
	102-56	External Assurance	We may seek external assurance in the future.

## MATERIAL TOPICS

<b>GRI 201: Economic performance 2016</b>	201-1	Direct economic value generated and distributed	Economic, page 47
<b>GRI 205 Anti-corruption 2016</b>	205-3	Confirmed incidents of corruption and actions taken	Anti-corruption, page 47
<b>GRI 306: Effluents and Waste 2016</b>	306-2	Waste by type and disposal method	Disposal and Management of Waste, page 48
<b>GRI 307: Environmental compliance 2016</b>	307-1	Non-compliance with environmental laws and regulations	Environmental Compliance, page 47
<b>GRI 308: Supplier environmental assessment 2016</b>	308-1	New suppliers that were screened using environmental criteria	Supplier Environmental Assessment, pages 49 to 50
<b>GRI 403: Occupational health and safety 2018</b>	403-1	Occupational health and safety management system	Occupational Health and Safety, pages 50 to 51
	403-5	Worker training on occupational health and safety	
<b>GRI 405: Diversity and equal opportunity 2016</b>	405-1	Diversity of governance bodies and employees	Diversity and Equal Opportunity, pages 52 to 53
<b>GRI 419: Socioeconomic Compliance 2016</b>	419-1	Non-compliance with laws and regulations in the social and economic area	Socioeconomic Compliance, page 53