



NEW SILKROUTES
GROUP LIMITED

SUSTAINABILITY REPORT 2020

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About This Report

[GRI 102-1 | 102-46 | 102-50 | 102-52 | 102-53 | 102-54 | 102-56]

For the third consecutive year, the New Silkroutes Group Limited (“NSG” or the “Group”) presents our third annual Sustainability Report for the financial year ended June 30th, 2020 (“FY2020”). This report follows the Global Reporting Initiative Standards: Core Option (“GRI Standards”) and the Singapore Exchange Securities Trading Limited (“SGX-ST”) Rules 711A and 711B of the listing manual. For the full list of the references and disclosures used in this report, refer to the GRI Content Index listed at the end of this report.

Report content and topic boundaries

This report defines NSG’s Environmental, Social, and Governance (“ESG”) management strategy and performance for the financial period FY2020, July 1st, 2019, to June 30th, 2020. It will cover NSG’s business operations in two major segments, the energy and the healthcare segments with the latter consisting of clinics and two dental supply companies in Singapore, as well as a sale and production of non-woven biodegradable linen company in China acquired in FY2019.

With the addition of sustainability reporting as required by the Singapore Exchange (“SGX”), we had created long-term value for our stakeholders through the incorporation of sustainable business practices, commitment to transparent reporting, and disclosure on our approach to sustainability issues. This report will detail NSG’s management approach to material ESG issues and its obligation to greater corporate sustainability. The report content is in accordance with the following reporting principles set out by the GRI Standards.

- 1 STAKEHOLDER INCLUSIVENESS**
To identify NSG’s key stakeholders and understand their interests and reasonable expectations in determining the report context.
- 2 SUSTAINABILITY CONTEXT**
To present NSG’s performance in relation to the demands and limitations of the economic, environmental, and social factors.
- 3 COMPLETENESS**
To evaluate the data availability of specific and material topics, as well as to determine the topics’ boundaries.
- 4 MATERIALITY**
To identify internal and external factors to determine topics required for reporting due to their significant impact on NSG’s performance and influence on stakeholder decisions.

NSG has not sought external independent assurance for this sustainability report. However, succeeding reports will be taken into consideration as necessary.

Contact

We value and welcome our stakeholders feedback related to this sustainability report. Please write us at:

ipr@newsilkroutes.org

About New Silkroutes Group

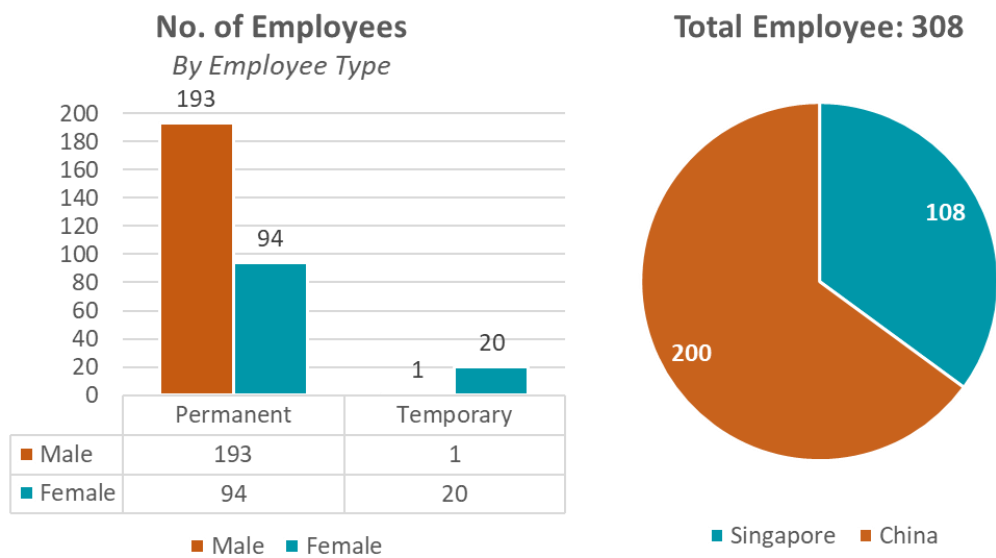
[GRI 102-2 | 102-3 | 102-4 | 102-5 | 102-6 | 102-7 | 102-8]

An SGX Mainboard-listed investment holding company founded in 1994 headquartered in Singapore, NSG mainly operates under its subsidiaries in two key divisions, namely healthcare and energy sectors.

NSG’s healthcare division operates under its subsidiaries, Healthsciences International Pte. Ltd. (“HSI”) and a wholly-owned subsidiary, Shanghai Fengwei Garment Accessories Co., Ltd (“Shanghai Fengwei”). HSI owns and operates a network of primary healthcare medical and dental clinics as well as the provision of dental supplies in Singapore. It houses a specialized team in hospital development and management, with an area of focus in Southeast Asia and China.

NSG holds a portfolio of 16 clinics in Singapore under HSI made up of one dental specialist, one aesthetic, one Traditional Chinese Medicine (TCM), five family medicine, and eight dental clinics. This portfolio aims to provide high-quality care at an affordable cost to our customers and patients.

Our workforce for the financial period FY2020:



In recent years, the Group has grown its healthcare portfolio to include healthcare supplies in a further step to complement the hospital development and management team in improving hospital’s operations cost efficiencies. The acquisition of Shanghai Fengwei, a Chinese manufacturer of non-woven biodegradable linen, in January 2019, was made to support our goal.

NSG’s energy division operates under its wholly-owned oil trading subsidiary, International Energy Group Pte. Ltd. (“IEG”), serving wholesalers, oil distributors, and commodity market players with customers in the key markets of Southeast Asia, North Asia, parts of Europe, and the Middle East. In addition to physical oil trading, IEG owns and operates oil product tankers on the safe operation of ship management.

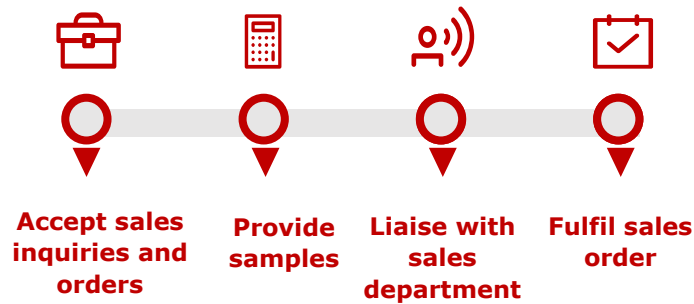


Supply Chain

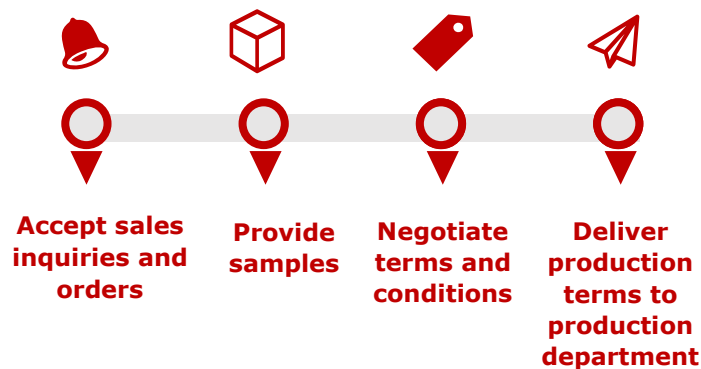
HSI adopts a systematic approach in ensuring the rational use of medicines, including best dispensing practices, clinical protocol adherence to prescribed medications, and cost efficiency and effectiveness. We maintain seamless business operations by improving supply chain engagement, hence, securing adequate resources, such as medicine, dental or orthodontic appliances, and more.

At Shanghai Fengwei, the implementation of an effective production plan, operating seven production lines in five workshops, helps to achieve timely completion of production requirements.

Shanghai Fengwei’s sales department is responsible for accepting sales inquiries and orders, providing samples, negotiating terms and conditions, and delivering production terms to the production department.



Shanghai Fengwei’s production department comprises of the equipment, electrical, and technological components that ensure the machines and equipment are running effectively, and manage the purchase of raw and auxiliary materials, liaison with the sales department in fulfilling the sales order. The primary raw material is polypropylene pellets, which are then added with color additives to make them into cloth. The final product is packed in packaging films and delivered to customers via container trucks or stored in cool, dry, and well-ventilated warehouses.



IEG’s supply chain in the sale of goods follows the Incoterm rules set by the International Chamber of Commerce that establishes the trade terms for the delivery of goods from sellers to buyers.

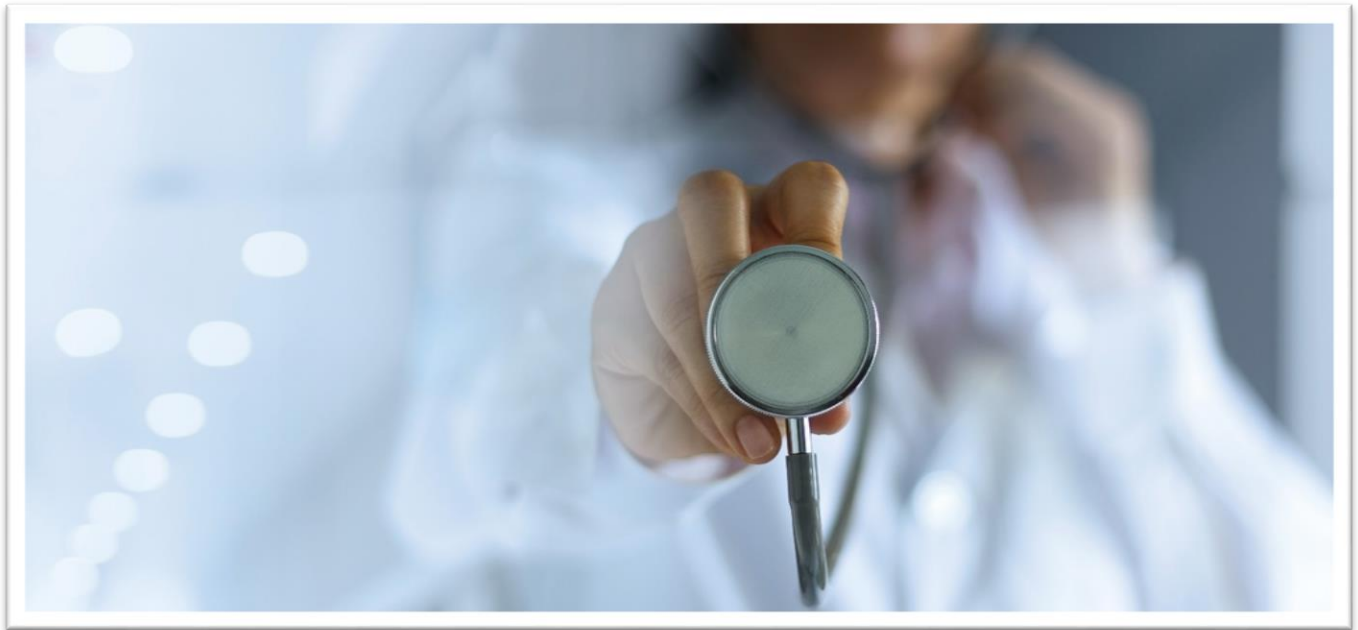
As we operate in the trading of oil products, the positioning of our supply chain satisfies the demands of the refineries and end-users. IEG conducts business specifically with terminals, facilities, and ship-owners that follow adequate maintenance procedures and safety measures such as the attendance of superintendents to oversee operations.

In support of our responsibility in maintaining a sustainable supply chain, we have set up measures of prevention in the negative impacts of oil shipments. It includes appointing inspectors on every transaction, sourcing responsible suppliers and ship-owners, and ensuring related parties’ adherence to guidelines of respective product material safety data sheets.

We are committed to establishing an efficient and safe model supply of oil products, integrating our innovations in product supply, and meet the needs of our present and future customers.

Sustainability at NSG

[GRI 102-9 | 102-11 | 102-12 | 102-13 | 102-16 | 102-18]



Sustainability governance

NSG is committed to working collectively toward our sustainability goals wherever we operate globally, in Singapore and China. The Board, the governing body of NSG, is responsible for overseeing ESG issues and driving the global sustainability agenda forward.

The latest annual report, under the corporate governance section of pages 16-30, shows our governance framework structure. NSG’s corporate governance framework is aligned with the underlying principles and guidelines of the Code of Corporate Governance 2018 (the “Code”).

Since the Board approved the Enterprise Risk Management (“ERM”) framework established in May 2019, we have implemented an effective process of identifying compliance issues, assessing, and potentially mitigate the threat of material risks. It applies to ESG-related risk as we recognize the extent of its impact, both positive and negative, and opportunities it may present across all business divisions.

Vision and Mission

Our purpose is parallel with our healthcare division, HSI practice in prioritizing serving our patients and the community’s interest before self-interest. We envision NSG as Asia’s leading integrated healthcare provider that promotes sustainable healthcare.

Our mission to create a positive impact on the lives of others is accomplished through the provision of high-quality healthcare and fulfilling corporate social responsibility. We value and serve our patients and caregivers with compassion, dignity, and respect. We will continue to strive for excellence in our service and practice with integrity.

We aim to achieve economic success at our energy division, IEG, together with our employees and business partners who practice the highest standards of trade execution. We maintain economic sustainability by reviewing the financial position of our trading counterparts and trade financing lines annually, to assure we receive the continued and interrupted support from financiers throughout our trade duration.

In mitigating environmental risks associated with our business operations, we ensure the chartering of double-hulled vessels and conducting checks on the validity of their Certificate of Seaworthiness as well as the qualifications of ship managers. Our shipping operations apply the international standards adopted in major oil companies, while our fleet applies the International Maritime Organization 2020 Emission Standards. This includes switching bunker fuel to low sulfur fuel to reduce sulfur oxides (SOx) emissions and carbon footprint.

External Initiatives

NSG is a member of the Singapore Business Federation at the Group level. All of our clinic professionals are registered and committed to the Codes of Professional Conduct of their respective regulatory bodies listed below:

On a group level, NSG is a member of the Singapore Business Federation. All professionals practising in our clinics under HSI are required to be registered and comply with the Codes and Conduct and guidelines of their respective professional bodies listed below:

- Singapore Medical Council
- Singapore Dental Council
- Traditional Chinese Medicine Practitioners Board

Shanghai Fengwei is a member of the following associations in China:

- China Nonwoven & Industrial Textiles Association
- Shanghai Federation of Industry and Commerce
- Shanghai Fire Protection Association
- Shanghai Yangtze River Delta Nonwovens Industry Association

As Singapore is currently facing an increasingly aging population, there is an increase in complex care needs in people with chronic diseases. We aspire to keep Singaporeans healthy and take a holistic approach to health condition management in the community.

IEG implements the regulations and guidelines for global organizations of the commodity industry, which include:

- Declaration of the United Nations Conference on the Human Environment, Stockholm (1972);
- International Convention on Civil Liability for Oil Pollution Damage, (1975);
- Convention on Civil Liability for Damages Resulting from Activities Dangerous to the Environment, (1993);
- Convention for the Prevention of Marine Pollution from Land-Based Sources, Paris (1974);
- UN Convention on the Law of the Sea, (1982)



Our Approach to Sustainability

Sustainability Board Statement

[GRI 102-14]

Dear Stakeholders,

The Board of Directors (the "Board") is pleased to present NSG's third Sustainability Report prepared per the GRI Standards: Core Option. This report highlights NSG's commitment to implement sustainable business practices and define our purpose to create long-term value for our stakeholders that result in a positive impact on our environment.

Maintaining our ESG Performance

Sustainability has been embraced by the Board and management as a strategic imperative, embedding it into NSG's core strategy and operations. We identify key trends and issues significant to our business and stakeholders by conducting a yearly review to refresh and revalidate previous material ESG topics for disclosure. The process includes benchmarking against peers in the industry to understand their performance and response and consider its relevancy to our practice. As a result, we have prioritized five main topics as reported in the previous year, namely, Economic Performance, Effluents and Waste, Customer Health and Safety, Marketing and Labelling, and Customer Privacy. We believe that change starts from within. Hence, we have pledged to create and maintain a sustainability framework and fulfill it by building a culture of sustainability within the organization that motivates corporate accountability, and at the same time achieving long-term economic value.

In FY2020, NSG directly generated a positive economic value of US\$375.0 million, of which US\$376.5 million is distributed mainly as costs of goods sold under operating costs, as well as employee wages and benefits among other societal contributions, resulting in a negative economic retained of US\$1.5 million for the Group. The Board is aware of the importance of meeting the best interests of shareholders through economic growth while promoting environmental stewardship. We assure the utmost integrity, transparency, and accountability in our existing practices. Embedding sustainability into our business practices has made us conscious of the adverse impact on the environment, given the nature of the healthcare industry's treatment with biohazards. NSG views environmental health as important as human health. With the declining condition of the environment, exposing people to climate-related health risks, we take great responsibility for our contribution to the impacts of climate change by reducing the environmental footprint from healthcare waste generated.

At NSG, we raise the importance of social sustainability, as evident in the perfect track record of zero reported incidents of non-compliance with Customer Health and Safety, Marketing and Labelling, and Customer Privacy regulations. Moving forward, we remain committed to upholding the highest standards of ethical conduct and social responsibility. A no-blame culture is fostered in the organization to motivate and maximize employees' accountability to report any incidents and create a habit of continuous learning.

Looking Ahead

The Group will continue our efforts to address ESG issues that not only improves the company's financial performance but enhance corporate resilience and deliver sustainable growth.

Mr Darrell Lim Chee Lek

Acting Independent Non-Executive Chairman and Lead Independent Director

Stakeholder Engagement

[GRI 102-40 | 102-42 | 102-43 | 102-44]

NSG identifies its stakeholders as a group of people that have an influence on or are affected by the business’s operations, including external organizations possessing expertise on material topics. When engaging stakeholders, we utilized the two-way communications system to encourage feedbacks and integrate their interests, concerns, and suggestions for improvement towards our sustainability strategies and initiatives. It allowed us to leverage the feedback provided to highlight significant issues when formulating business strategies and policies to achieve long-term organizational success.

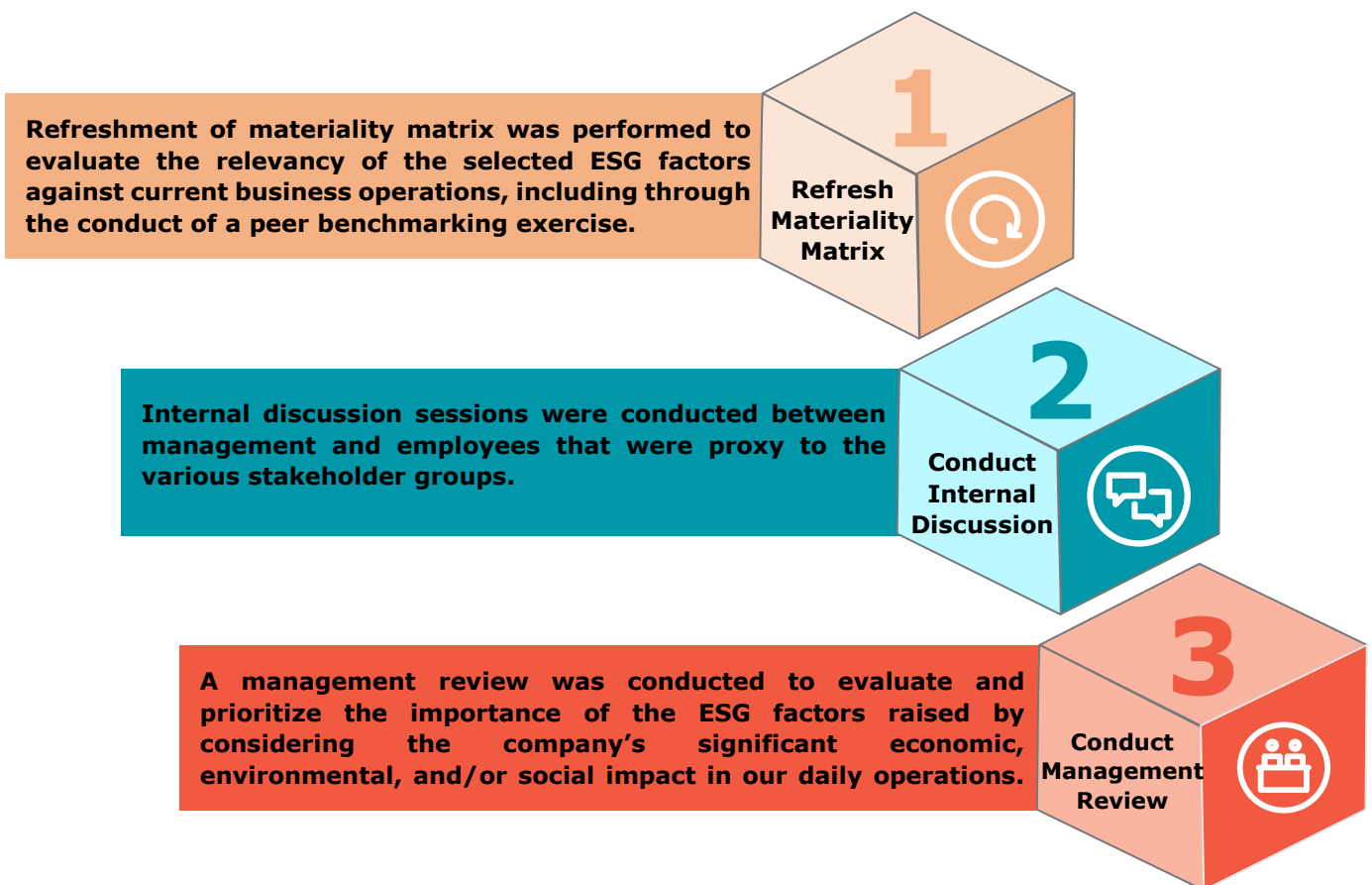
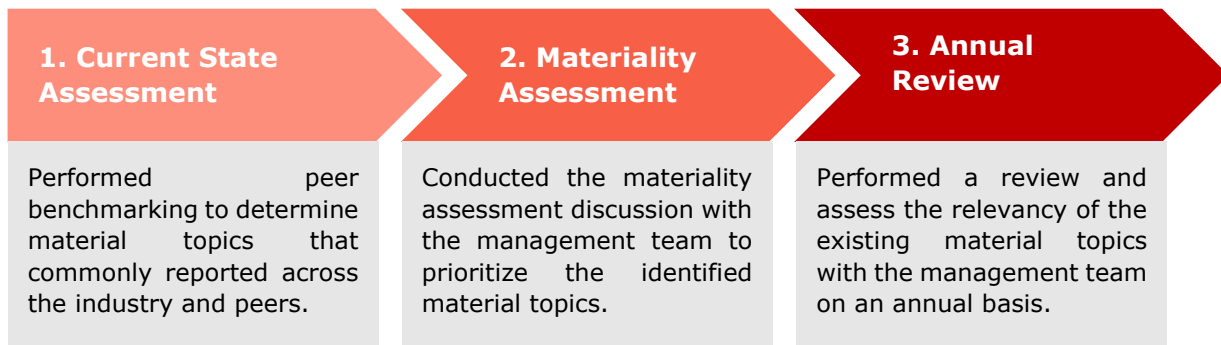
The table below lists the key stakeholders and the respective engagement channels and frequencies. We are continuously improving our communication channels to connect better with our stakeholders and accurately interpret stakeholder needs into corporate goals.

Stakeholders	Frequency of Engagement	Modes of Engagement
Shareholders	Annually/Quarterly/ Ad hoc	Quarterly financial results Annual and Extraordinary general meeting Investor relations contact Media release
Top Management	Quarterly/Ad hoc	Board meetings Management meetings
Customers	Ad hoc	Front line team members Electronic feedback channel via website Emails Phone calls Face-to-face patient care
Employees	Annually/Ad hoc	Emails Annual appraisals Regular dialogue sessions with senior management
Suppliers	Ad hoc	Request for quotations Request for proposals Site visits Meetings Email correspondences Phone calls
Regulators	Annually/Ad hoc	Annual inspection Regulatory guidelines Emails Phone calls

Materiality Assessment

[GRI 102-46 | 102-47 | 103-1]

The report content and materiality assessment process conducted under the guidance of the GRI Principles for Defining Report Content identifies material topics relevant to our operation and stakeholders. A materiality refresh exercise, including benchmarking analysis against industry peers, is conducted every year to re-evaluate and update previous material ESG topics with the current operation. The following figure outlines the materiality refresh process:



The following table summarises the GRI topics and the aspect boundaries identified as the most significant to NSG for FY2020:

Category	Topic	Sub-topic	Aspect Boundary ¹	Applicable Divisions	
				Healthcare	Energy
Economic	Economic Performance	201-1: Direct economic value generated and distributed	Within Organisation	✓	✓
Social	Customer Health and Safety	416-2: Incidents of non-compliance concerning the health and safety impacts of products and services	Within Organisation	✓	Not in scope
	Marketing and Labelling	417-2: Incidents of non-compliance concerning product and service information and labelling	Within Organisation	✓	Not in scope
		417-3: Incidents of non-compliance concerning marketing communications	Within Organisation	✓	Not in scope
	Customer Privacy	418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	Within Organisation	✓	✓

¹ Aspect Boundary is a description of where the impacts occur for a material topic and the organisation's involvement with those impacts. Organisations might be involved with impacts either through their own activities or as a result of their business relationships with other entities.

Our Core Focus

Economic

Economic Performance

[GRI 103-1 | 103-2 | 103-3 | 201-1]

Why is this a material issue?

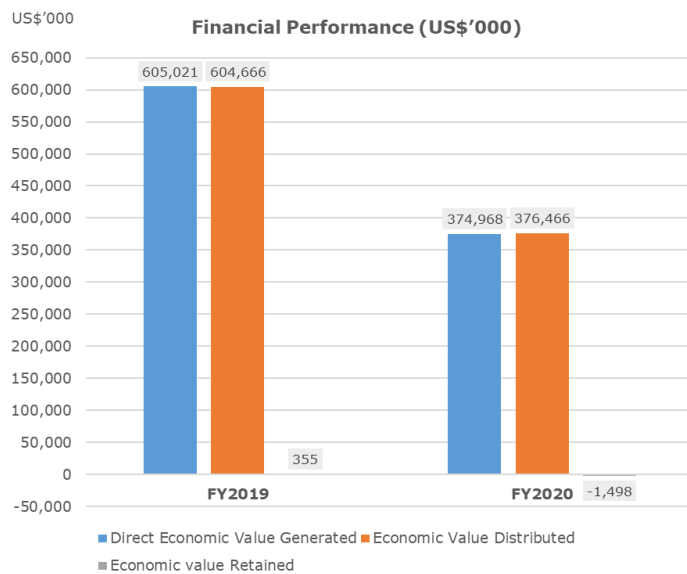
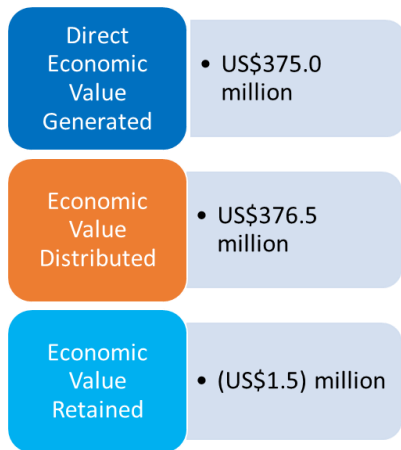
The financial performance of the Group helps stakeholders, especially shareholders and investors, in understanding and assessing the financial well-being and sustainable economic growth as a result of incorporating sustainable practices.

Management approach

NSG’s overall financial performance was impacted by an one-time impairment loss on intangible assets and trade and other receivables. During the year, we had also planned to expand our network of clinic specifically to extend specialist services as a vertical integration of our primary clinic services. However, with the uncertainty arising from Covid-19, we decided to put the plan on hold and to review the plan when the economy re-opens.

FY2020 Performance and targets

The charts below highlight our economic performance (i.e. direct economic value generated², economic value distributed³ and economic value retained⁴) for FY2020. More information on our financial performance as a Group is disclosed in our 2020 Annual Report.



² Direct economic value generated typically refers to the revenue generated by the organisation for the reporting period, which can be calculated as net sales, plus revenues from financial investments and sales of assets.

³ Economic value distributed typically refers to the sum of operating costs, employee wages and benefits, payments to providers of capital, payments to government by country and community investments.

⁴ Economic value retained refers to the value of direct economic value generated less economic value distributed.

Delivering Value to Customers

Customer Health and Safety

[GRI 103-1 | 103-2 | 103-3 | 416-2]



Why is this a material issue?

As a health care provider, our fundamental practice has a direct influence on the health and safety conditions of our patients. It is in our discipline to prioritize the needs and well-being of HSI’s patients, who had entrusted their health in the hands of our professionals. NSG goes the extra mile to value-add and delivers quality essential health services than settling on the expected purpose of our products and services.

Our management approach

HSI is in complete regulatory compliance with the government’s healthcare laws such as the Private Hospitals and Medical Clinics Act, Medicine Act, and the Health Products Act enacted by the Ministry of Health and Health Sciences Authority. To ensure consistent adherence across our clinics, we follow a comprehensive set of standard operating procedures (“SOP”) for clinical practice, including clinic workflows and Code of Conduct for clinical assistants. SOP undergoes annual review by department leaders and updates or changes to receive approval from the Chief Executive Officer. To err is human. NSG takes measures to prevent and reduce risks, errors, and harm that occur to patients during the provision of health care by ensuring well-trained clinical employees through mandated orientations and on-the-job training for new employees supervised by the Clinic Heads. Additionally, monthly compliance audits conducted reduces compliance risks. We are continuously educating and imparting knowledge on patient safety and best clinical practices to our clinicians and frontline employees through analyzing case studies and industrial accidents.

FY2020 performance and targets

In FY2020, the organisation has not identified any non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of its products and services. Going forward, we aim to maintain our record for FY2021. We also aim to establish a baseline for FY2021 and derive indicators relating to safety in the workplace.

Marketing and Labelling

[GRI 103-1 | 103-2 | 103-3 | 417-2 | 417-3]



Why is this a material issue?

At NSG, we are committed to upholding ethical business practices and maintaining a strong reputation. We firmly believe in employing the ethical marketing of our products and services to our customers and stakeholders. We promote transparent communication of the economic, environmental, and social impact of our brands, products, and services. As any miscommunication may jeopardize our patient’s health and violate marketing and labeling standards, we ensure business integrity is the single, most important determinant of sales profitability.

Healthcare Services Act (HCSA)

On 6th January 2020, the Singapore Parliament passed the Healthcare Services Bill to supersede the Private Hospitals and Medical Clinics Act enacted in 1980.

What are the key changes?

Introduces a **services-based** licensing regime, where healthcare service providers are required to obtain a license based on the types of service provision, instead of a premises-based licensing regime. The **expanded regulatory scope** to cover healthcare services, allied health and nursing services, traditional medicine, and complementary and alternative medicine. **Enhanced measures** implemented to **minimize public misperception** and **improve patient safety and welfare**.

When is it effective?

It is expected to be implemented to the following group of PHMCA licensees in **three phases**, starting from **early 2021** and ending in 2022.

Phase 1	Phase 2	Phase 3
<small>Laboratory licensees care services</small>	<small>Clinics and ambulatory</small>	<small>Hospital licensees and other innovative healthcare services</small>

Our management approach

All of HSI’s registered healthcare professionals comply with the requirements and guiding principles in the Code of Conduct of their respective professional bodies, including those of the Singapore Medical Council, Singapore Dental Council, and Traditional Chinese Medicine Practitioners Board. The Code of Conduct includes standards for the ethical marketing of healthcare, pharmaceutical, and medical products. Additionally, pursuant to the Private Hospitals and Medical Clinics Act (“PHMCA”).

FY2020 performance and targets

In FY2020, the organisation has not identified any incidents of non-compliance with regulations resulting in a fine/penalty, a warning, or with voluntary codes related to product and service information and labelling, and with matters related to marketing communications, including advertising, promotion and sponsorship. Going forward, we aim to continue to comply with the rules within the PHMCA and Codes and Conduct and guidelines established by the professional bodies.

Customer Privacy

[GRI 103-1 | 103-2 | 103-3 | 418-1]

Why is this a material issue?

NSG respects and protects our customers’ privacy as it is necessary to establish trust and loyalty, particularly that of HSI’s patients. Patient’s treatment and medical records are sensitive data, and a breach of patient confidentiality is a serious matter. To preserve the Group’s success in upholding the highest standard of ethics, we ensure that customer’s data are collected and safeguarded to prevent violating our customer’s trust.

Our management approach

NSG takes proactive approach to protect our customer’s privacy. Since 2018, a notice issued to all employees informed them of their protection obligation and duty under the Personal Data Protection Act 2012 (“PDPA”). It enumerates the Group’s Privacy and Personal Data Protection Policies procedures on the collection, protection, and ensuring safe handling of personal data of our existing and prospective customers, business associates, and employees. Furthermore, we have established SOPs for our clinical practice to lead clinical assistants and assure the safeguarding of patient privacy and confidentiality.

We take serious responsibility in adhering to these implemented policies and have communicated to our employees on the imposed potential disciplinary actions in the occurrence of a breach. A designated Data Protection Officer (“DPO”) was appointed to oversee and enforce the responsibilities of the Group to ensure compliance with the PDPA. For any related matters, the DPO is contactable at dpo@newsilkroutes.org.

What personal information and data we collect?



Personal information including credit-related, services provided, and dealings with us, including telephone records, email and online interactions, and photos and CCTV recordings. Information of your **interaction with our website** and other types not considered personal data under the PDPA, such as your IP address, and internet browser are for the purpose of improving our website.

How do we collect personal data?

Your direct **consent**, deemed consent or otherwise permitted under the PDPA or other applicable laws.



Who do we share your personal data with?



Our **group companies, affiliates, partners, principals, third party service providers** (providing administrative or marketing support), and **governmental or regulatory authorities**. If any of our businesses are sold or transferred to another entity, your personal data may be transferred along with the business. If the entity is located or operating outside of Singapore, we will takes measures to ensure the overseas recipient provides a standard of protection to your personal data.

FY2020 performance and targets

There were no reports of substantiated complaints received from outside parties, the Group, and regulatory bodies regarding customer data loss and privacy breach, nor identified leaks, thefts, or losses of customer data. To maintain our excellent standing in the year to come, the Human Resource department will administer training sessions for employees to keep abreast of developments in the PDPA and its obligations.

GRI Content Index

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S)	OMISSION	
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GRI 102: General Discs 2016	Organisational Profile			
	102-1	Name of the organisation	3	-
	102-2	Activities, brands, products, and services	4	-
	102-3	Location of headquarters	4	-
	102-4	Location of operations	4	-
	102-5	Ownership and legal form	Page 4 of NSG's FY2020 Annual Report (AR)	-
	102-6	Markets served	4	-
	102-7	Scale of the organisation	4	-
	102-8	Information on employees and other workers	4	-
	102-9	Supply chain	5	-
	102-10	Significant changes to organisation and its supply chain	Not applicable	We do not have Significant changes to organisation and its supply chain in FY2020
	102-11	Precautionary Principle or approach	6	-
	102-12	External initiatives	6	-
	102-13	Membership of associations	6	-
	Strategy			
	102-14	Statement from senior decision-maker	8	-
	Ethics And Integrity			
	102-16	Values, principles, standards, and norms of behaviour	6	-
	Governance			
	102-18	Governance structure	6	-
	Stakeholder Engagement			
	102-40	List of stakeholder groups	9	-
	102-41	Collective bargaining agreements	Not applicable	We do not have employee unions in our business
	102-42	Identifying and selecting stakeholders	9	-
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	102-44	Key topics and concerns raised	9	-
	Reporting Practice			
	102-45	Entities included in the consolidated financial statements	To be updated	
	102-46	Defining report content and topic Boundaries	3	
	102-47	List all material topics	11	
	102-48	Restatements of information	Not applicable	-
	102-49	Changes in reporting	Not applicable	-
	102-50	Reporting period	3	-
	102-51	Date of the most recent report	New Silkroutes Group Limited Sustainability Report 2019	-
	102-52	Reporting cycle	3	-
	102-53	Contact point for questions regarding this report	3	-

GRI STANDARD	DISCLOSURE		PAGE NUMBER(S)	OMISSION
	102-54	Claims of reporting in accordance with the GRI Standards	3	-
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	102-56	External assurance	3	-
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	103-2	The management approach and its components	12	-
	103-3	Evaluation of the management approach	12	-
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	12	-
SOCIAL				
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	13	-
	103-2	The management approach and its components	13	-
	103-3	Evaluation of the management approach	13	-
GRI 416: Customer Health and Safety 2016	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	13	-
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	14	-
	103-2	The management approach and its components	14	-
	103-3	Evaluation of the management approach	14	-
GRI 417: Marketing and Labelling 2016	417-2	Incidents of non-compliance concerning product and service information and labelling	14	-
	417-3	Incidents of non-compliance concerning marketing communications	14	-
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	15	-
	103-2	The management approach and its components	15	-
	103-3	Evaluation of the management approach	15	-
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	15	-