

## SUSTAINABILITY REPORT

# SUSTAINABILITY FRAMEWORK

WE PLACE SUSTAINABILITY AT THE HEART OF OUR STRATEGY, DELIVERING SOLUTIONS FOR SUSTAINABLE URBANISATION WHILE CREATING ENDURING VALUE FOR OUR STAKEHOLDERS – THROUGH ENVIRONMENTAL STEWARDSHIP, RESPONSIBLE BUSINESS PRACTICES, AND NURTURING OUR PEOPLE AND THE COMMUNITIES, WHEREVER WE OPERATE.



### ENVIRONMENTAL STEWARDSHIP

We will do our part to combat climate change, and are committed to improving resource efficiency and reducing our environmental impact.

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For more information, go to: pages 67 to 69



### RESPONSIBLE BUSINESS

The long-term sustainability of our business is driven at the highest level of the organisation through strong corporate governance and prudent risk management.

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For more information, go to: pages 70 to 72



### PEOPLE AND COMMUNITY

We are committed to providing a safe and healthy workplace, investing in developing and training our people, and uplifting communities wherever we operate.

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For more information, go to: pages 73 to 76

## LETTER TO STAKEHOLDERS

GRI 102-14

### DEAR STAKEHOLDERS,

Keppel DC REIT continued to deliver growth and maintained strong operational performance in 2019. We acquired two assets in Singapore and announced the acquisition of Kelsterbach Data Centre in Germany. These acquisitions, together with the REIT's healthy portfolio statistics, will continue to provide income stability and sustainable returns to Unitholders.

As we pursue growth, we also strive to build a responsible business by embracing green initiatives, upholding strong governance and nurturing our people and the communities where we operate.

### EMBRACING GREEN INITIATIVES

Data centres are mission critical facilities that operate round-the-clock to provide uninterrupted power services through redundancy, ensuring that businesses operate with zero downtime. The need for resiliency and high performance typically sees these facilities being energy-intensive. Power is required to sustain IT equipment, while water is needed for the cooling infrastructure that maintains the optimal environmental conditions for the IT equipment.

In 2019, we stepped up efforts to improve sustainable practices at some of our colocation facilities in Singapore and Dublin. These included works to improve energy performance and extend equipment lifespan. In addition, Keppel DC REIT also uses renewable energy in its Dublin assets. In 2019, 18.1% of Keppel DC REIT's total electricity consumed was powered by wind, thus reducing about 29,003 tCO<sub>2</sub>e of GHG emissions that would have resulted from non-renewable sources.

Various measures were also undertaken to minimise water consumption. For instance, the majority of Keppel DC REIT's colocation assets are equipped with water recirculation technology. Overall water consumption increased by 6% in 2019 due largely to the full year data contribution from Keppel DC Singapore 5 where clients ramped up their activities.

### UPHOLDING STRONG GOVERNANCE

Keppel DC REIT was recognised for efforts in governance, ranking third in the



We strive to build a responsible business through embracing green initiatives, upholding strong governance and nurturing our people and the communities where we operate.

Governance Index for Trusts (GIFT) and ninth in the Singapore Governance and Transparency Index in 2019. The REIT was also Runner Up in the Most Transparent Company Award under the REITs and Business Trusts category at the SIAS 20th Investors' Choice Awards.

### NURTURING OUR PEOPLE AND THE COMMUNITY

These achievements would not have been possible without the collective efforts of all our employees. We invest in the professional development of our employees and foster a positive work culture that supports open communication and the sharing of best practices.

In addition, safety is one of our core values. We are committed to instil a strong safety culture and maintain a safe work environment so that everyone who comes to work returns home safe. In 2019, there were no fatalities and reportable incidents at Keppel DC REIT's facilities.

We believe in doing well by doing good. In 2019, together with volunteers from Keppel Capital, we contributed about 1,380 community hours and engaged and supported various community groups such as persons with disabilities and the underprivileged.

Sustainability is an ongoing journey. As we strive to make a difference, we welcome any constructive feedback that will help us further improve our sustainability efforts.

Yours sincerely,

*Chua Hsien Yang*

**CHUA HSIEN YANG**  
Chief Executive Officer  
18 February 2020

## ABOUT THIS REPORT

### GLOBAL REPORTING INITIATIVE STANDARDS

GRI 102-50 | 102-52 | 102-54

This is Keppel DC REIT's fourth sustainability report, and is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option. It outlines the REIT's Environmental, Social and Governance (ESG) management approach, initiatives and performance metrics for the period from 1 January 2019 to 31 December 2019.

### REPORTING PERIOD AND SCOPE

GRI 102-46 | 102-53 | 102-56

As part of its strategic oversight, the Board has considered Keppel DC REIT's material ESG issues in the REIT's strategy formulation, taking into account inputs from the management team and key stakeholders. The Board reviews and monitors these ESG issues periodically. To communicate its ESG approach, Keppel DC REIT publishes an annual sustainability report in accordance with the internationally recognised GRI Standards.

The content and topic boundaries in this report reflect the Manager's overall sustainability strategy and is aligned with the GRI's principles for defining report content: Materiality, Stakeholder Inclusiveness, Sustainability Context and Completeness. This report focuses on the key ESG factors that are material to the REIT's business. The GRI Content Index on pages 77 to 79 indicates the full list of GRI references and disclosures used in this report.

This report covers the REIT and its colocation data centre assets which the Manager has operational oversight of, excluding Keppel DC Singapore 4 (KDC SGP 4), a colocation facility which was acquired in November 2019. Assets covered include:

#### Singapore

1. Keppel DC Singapore 1 (KDC SGP 1)
2. Keppel DC Singapore 2 (KDC SGP 2)
3. Keppel DC Singapore 3 (KDC SGP 3)
4. Keppel DC Singapore 5 (KDC SGP 5)

#### Malaysia

5. Basis Bay Data Centre (Basis Bay DC)

#### Australia

6. Gore Hill Data Centre (Gore Hill DC)

#### Ireland

7. Keppel DC Dublin 1 (KDC DUB 1)
8. Keppel DC Dublin 2 (KDC DUB 2)

This report includes the full year data from KDC SGP 5, which was acquired in June 2018.



The Manager seeks to enhance operational efficiency of the data centre assets to optimise electricity and water consumption.

### PERFORMANCE DATA

	2019	2018	Page
Total Energy Consumption (GJ)	1,233,647	1,176,143	68
Total Water Consumption (m <sup>3</sup> )	361,256	341,126	68
Training Hours per Employee	27.4	32.4	75
Accident Frequency Rate (reportable accidents per million man-hours)	0	0	75
Accident Severity Rate (man-days lost per million man-hours)	0	0	75

Master leased facilities are not included in the reporting scope as the Manager does not have operational control over these assets. The following master leased assets are excluded in this report: DC1 in Singapore, Intellicentre 2 Data Centre and isseek Data Centre in Australia, Cardiff Data Centre and GV7 Data Centre in the United Kingdom, maincubes Data Centre in Germany, Milan Data Centre in Italy and Almere Data Centre in the Netherlands.

Standard units of measurements used in this report, and conversion factors, where applicable, are explained in the respective sections. All dollar values expressed herein are in Singapore Dollar.

This report has been reviewed by an external reporting consultancy and has gone through a detailed internal review process. This report has not been externally verified. The Manager will review the need for external assurance as it continues to develop its sustainability framework.

The Manager welcomes feedback that will enhance its sustainability efforts, and considers stakeholders' recommendations in its management approach and communication efforts. Please share your feedback with us at [investor.relations@keppeldcreit.com](mailto:investor.relations@keppeldcreit.com).

# MANAGING SUSTAINABILITY

GRI 102-47 | 103-1 | 103-2

Sustainability management is central to the Manager’s strategy in positioning Keppel DC REIT as the preferred data centre provider. The Manager recognises that ESG impact is a crucial aspect of effective risk management in today’s changing environment.

The Manager is committed to uphold strong corporate governance, practise environmental stewardship, develop human capital and engage local communities to create long-term value for all stakeholders.

## GOVERNANCE STRUCTURE

GRI 102-16 | 102-18

The Manager adheres to Singapore’s Code of Corporate Governance 2018 (Code), issued by the Monetary Authority of Singapore. The Code provides a framework for controls, checks, and accountability, and requires the Board of Directors (Board) to consider sustainability issues in its business decisions. Sustainability and risk management are also considered in the evaluation of any investment opportunity.

To ensure that sustainability and best practices are integrated in the organisation, the Manager established a Sustainability Committee spanning all relevant functions, including Asset Management, Facility Management, Investment, Human Resources, Finance, Risk and Compliance and Investor Relations. The committee monitors the REIT’s ESG performance in relation to the material issues identified by the Manager and reviews these topics periodically. The feedback from the committee helps guide the Manager’s sustainability strategy and ensure the organisation stays on track to achieve its sustainability goals.

The Manager’s scorecard incorporates sustainability aspects in support of the Keppel Group’s commitment to sustainability. The Manager is committed to uphold sound corporate governance and sustainability for the long-term success of the REIT.

The Manager engages with the investment community through multiple platforms to communicate material information and gain valuable feedback. This guides its strategy in achieving sustainable value creation.

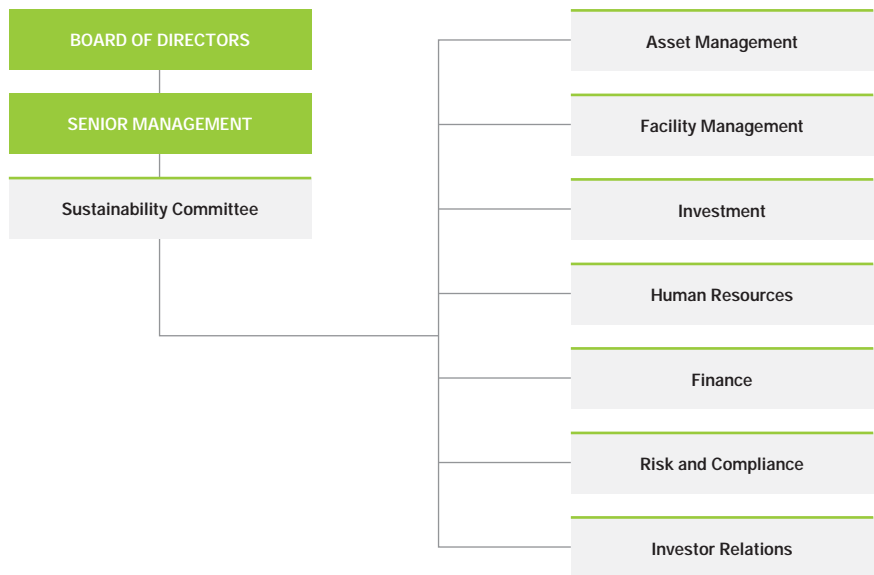
More details on Keppel DC REIT’s corporate governance guidelines and practices can be found on pages 143 to 163.

## EXTERNAL STANDARDS AND STRATEGIC MEMBERSHIPS

GRI 102-12 | 102-13

Together with the Keppel Group, the Manager supports initiatives that promote good corporate governance and best practices.

## SUSTAINABILITY MANAGEMENT STRUCTURE



Keppel Capital is a signatory of the United Nations Global Compact and is committed to the Compact’s 10 universal principles, which include human rights, labour, environment and anti-corruption.

Keppel DC REIT is a member of the REIT Association of Singapore (REITAS), which strives to enhance the operating and regulatory environment of the Singapore REIT (S-REIT) industry. Mr Chua Hsien Yang, the Chief Executive Officer of the Manager, serves as the Vice President of REITAS, and is also the Chairman of its Regulatory sub-committee.

Through Keppel Capital, the Manager also supports the Investor Relations Professionals Association of Singapore (IRPAS), which promotes best practices in investor relations through enhancing professional competencies. The Keppel Group supports the Securities Investors Association (Singapore) (SIAS), an organisation promoting good corporate governance and the empowerment of the investment community through investor education.

In Dublin, Keppel DC Ireland is a member of the Large Industry Energy Network (LIEN). Supported by the Sustainable Energy Authority of Ireland, LIEN is a collaborative group of companies that work together to improve energy management and implement sustainable energy solutions. LIEN members are required, among others, to develop an energy management programme, set and review energy targets, as well as report their energy performance annually.

## COMMITMENT TO STAKEHOLDERS

GRI 102-42 | 102-43

Key stakeholders, determined by their ability to affect or be affected by the REIT’s business practices and sustainability performance, were identified as part of the initial materiality assessment to map out Keppel DC REIT’s sustainability reporting framework. This ensures that all relevant perspectives are considered as part of the assessment.

The Manager maintains a dialogue with stakeholders to gather valuable feedback and address their queries and concerns. The Manager is also committed to ensuring that information is provided to the REIT’s stakeholders in a transparent and timely manner.

This ongoing engagement process allows the Manager to adapt emerging ESG risks and capitalise on opportunities in the prevailing business environment, as well as refine its efforts to create greater sustainability impact.

## MATERIALITY ASSESSMENT

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

Materiality is a core aspect of effective sustainability reporting. The Manager aligns its materiality framework with the principles of the SGX Sustainability Reporting Guide and the GRI Reporting Principles for defining report content. This report addresses the economic, as well as the ESG issues that are relevant and significant to Keppel DC REIT and its key stakeholders.

The materiality assessment identifies and prioritises key sustainability issues from the perspectives of internal and external stakeholders. The results are shown in the Materiality Matrix on the following page. External stakeholders' perspectives are obtained from feedback and responses to information requests received from stakeholders including investors, clients and business partners.

The results of the materiality assessment showed that the interests of Keppel DC REIT and its stakeholders are closely aligned, though issues relating to labour practices, safety and health were considered more significant to internal stakeholders than external stakeholders.

The Manager's stakeholder engagement approach is summarised in the table below.

After being deemed material, each issue is categorised into Highly Critical, Critical and Important issues. This report focuses on the Highly Critical and Critical issues which are reported in greater detail and given specific targets to guide the Manager in its sustainability efforts. Important issues are monitored internally and assessed for significance to be considered for reporting.

Among the Highly Critical and Critical issues, the Manager believes that economic performance, compliance, labour practices, employment, business ethics, safety and health and transparency are significant throughout


the business, while aspects such as building and service quality, energy efficiency, water management and sustainable procurement are more relevant to the investment and asset management parts of the business. These issues and targets help guide the REIT's sustainability strategy.

Keppel DC REIT's performance against its materiality issues are periodically monitored by the Manager. Should an emerging issue become relevant or an existing issue become less material, the management and reporting scope will be adjusted accordingly. This process is guided by feedback, stakeholder engagements, industry trends and developments.

## ENGAGEMENTS WITH KEY STAKEHOLDER GROUPS


GRI 102-40 | 102-44

 <b>EMPLOYEES</b>
<p><b>Objectives</b> Build talent pool through continual investments in training and development, as well as employee welfare.</p>
<p><b>Key Topics</b> Employees' personal and professional growth; sharing of ideas; culture of recognition and appreciation; self-directed learning.</p>
<p><b>Mode of Engagement</b> Involvement in different employee interest groups; dialogue sessions with senior leaders; employee engagement survey; appreciation day, health and wellness month; quarterly town halls; career day; leadership programmes; team building activities.</p> <p>More details on pages 73 to 76.</p>

 <b>CLIENTS</b>
<p><b>Objectives</b> Build deeper relationships with existing and prospective clients.</p>
<p><b>Key Topics</b> Building and service quality; health, safety, and environmental matters.</p>
<p><b>Mode of Engagement</b> Annual survey; onsite audit; meetings and functions with clients.</p> <p>More details on pages 70 to 72.</p>

 <b>INVESTORS</b>
<p><b>Objectives</b> Ensure timely and accurate disclosure of information.</p>
<p><b>Key Topics</b> Business strategy and corporate developments; financial performance.</p>
<p><b>Mode of Engagement</b> General meetings; local and overseas investor roadshows; quarterly analyst teleconferences; corporate website; email feedback; meetings and conference calls.</p> <p>More details on pages 18 to 20.</p>

 <b>BUSINESS PARTNERS</b>
<p><b>Objectives</b> Align suppliers to our values to enhance operational resilience.</p>
<p><b>Key Topics</b> Compliance; collaboration; health, safety, and environmental matters.</p>
<p><b>Mode of Engagement</b> Safety and operations workshops; annual reviews and feedback sessions.</p> <p>More details on pages 67 to 72.</p>

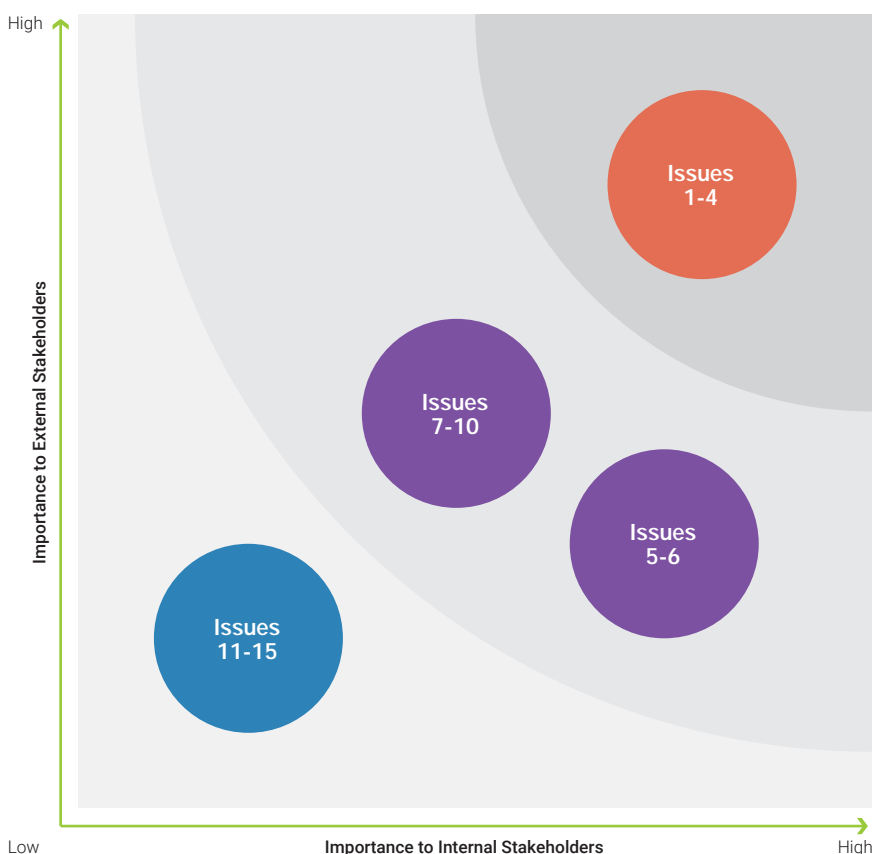
 <b>GOVERNMENTS</b>
<p><b>Objectives</b> Collaborate and work alongside on issues of mutual interest.</p>
<p><b>Key Topics</b> Feedback on new guidelines; opportunities for business collaboration.</p>
<p><b>Mode of Engagement</b> Meetings; site visits and functions.</p> <p>More details on pages 64 and 56.</p>

MANAGING SUSTAINABILITY

KEY MATERIAL ISSUES

Disclosure Number	Page Reference	Targets
Economic Performance	53 to 58	Maximise returns while maintaining financial flexibility and long-term sustainability
Building and Service Quality (including Client Privacy and Physical Security)	72	Obtain satisfactory score and above from key accounts during annual feedback
Compliance	71	Zero violation of laws and regulations of the countries where we operate
Energy Efficiency	67 to 69	Enhance operational efficiency to optimise water and energy consumption; as well as embed green initiatives to enhance energy and water efficiency
Water Management	68 to 69	
Labour Practices and Employment	73 to 75	Raise level of employee engagement and increase average training hours
Safety and Health	75 to 76	Zero-incident workplace
Business Ethics	70 to 72	Zero corruption
Transparency	64 to 65	Utilise multiple platforms to enhance stakeholder outreach and communication
Sustainable Procurement	72	Full compliance with local laws among our suppliers

MATERIALITY MATRIX\*



- Highly Critical Issues**
  1. Economic Performance
  2. Building and Service Quality (including Client Privacy and Physical Security)
  3. Compliance
  4. Energy Efficiency
- Critical Issues**
  5. Labour Practices and Employment
  6. Safety and Health
  7. Business Ethics
  8. Transparency
  9. Water Management
  10. Sustainable Procurement
- Important Issues**
  11. Material Use
  12. Effluents and Waste Management
  13. Anti-child and Anti-forced Labour
  14. Ethical Marketing
  15. Community Engagement and Development

\* The issues within each tier have not been ranked.

## ENVIRONMENTAL STEWARDSHIP

### EMBRACING GREEN PRACTICES AND TECHNOLOGIES, THE MANAGER ENSURES ENERGY AND WATER EFFICIENCY AND REDUCED GREENHOUSE GAS EMISSIONS.

#### CLIMATE ACTION

GRI 103-1 | 103-2 | 103-3

Data centres require high power to operate the IT equipment and to ensure that reliable cooling infrastructure are maintained under optimal environmental conditions in accordance with the clients' service level requirements.

The Manager is committed to address climate change as part of its Corporate Social Responsibility efforts, through clean technology, energy management optimisation and efforts to safeguard continuity against extreme weather.

#### Emissions<sup>a</sup>

GRI 305-1 | 305-2

Greenhouse Gas (GHG) emissions from the REIT consist primarily of Scope 1 direct emissions from fuel consumption and Scope 2 indirect emissions from grid electricity consumption. The majority of Keppel DC REIT's electricity is supplied from the grid, and fuel consumption is mostly diesel from backup generators.

Emissions are calculated based on methodologies from the internationally accepted GHG Protocol standards. Gases included in the calculation are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O), with totals expressed in units of tonnes of carbon dioxide equivalent (tCO<sub>2</sub>e). In 2019, Scope 1 GHG carbon emissions from the use of diesel totaled 1,033 tCO<sub>2</sub>e, while Scope 2 GHG emissions from electricity consumption was about 132,431 tCO<sub>2</sub>e<sup>b</sup>. Together, GHG emissions totaled 133,464 tCO<sub>2</sub>e in 2019, higher than 2018's total GHG emission of 111,428 tCO<sub>2</sub>e due primarily to the full year data contribution from KDC SGP 5 where clients ramped up their activities.

<sup>a</sup> The GHG emission Scopes 1 and 2 are defined by the GHG Protocol. Scope 1 refers to emission from company owned and operated facilities, machines, vehicles, etc. Scope 2 refers to emission from sources external to the company, but which provide the company with a service such as power plants and other utilities.

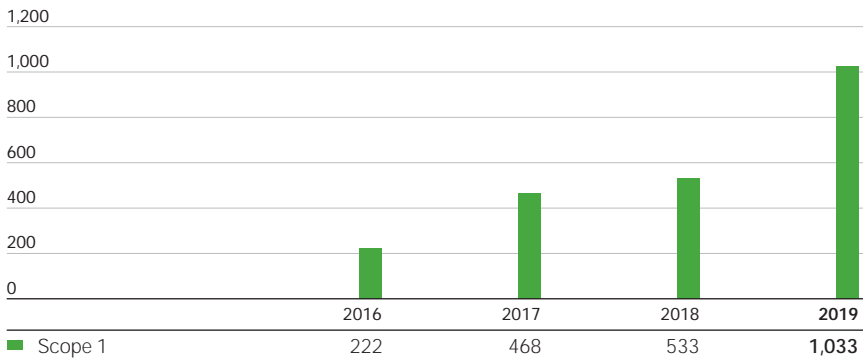
<sup>b</sup> The emissions factors and Global Warming Potential rates used were as defined by the UK Department for Environment, Food & Rural Affairs and the National Environment Agency of Singapore.

Electricity purchased for Keppel DC Dublin 1 and Keppel DC Dublin 2 (in image) are 100% renewable.

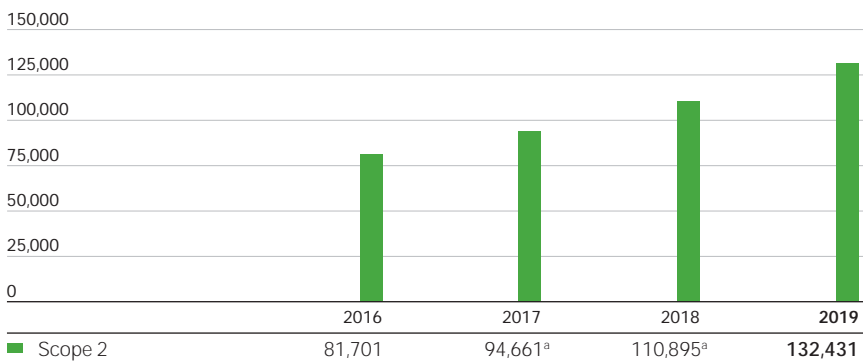


ENVIRONMENTAL STEWARDSHIP

CARBON EMISSIONS PER ANNUM (Scope 1) (tCO<sub>2</sub>e)



CARBON EMISSIONS PER ANNUM (Scope 2) (tCO<sub>2</sub>e)



<sup>a</sup> Scope 2 numbers have been restated for previous years to exclude KDC DUB 1 and KDC DUB 2 as they source 100% of electricity from renewable source. See GRI Content Index on pages 77 to 79 for the updated figures that show emissions only from non-renewable sources for 2018.



Electricity and water data are analysed on a regular basis to inform investment and business decisions.

To reduce GHG emissions, the Manager implements advanced energy management and uses clean energy sources. The electricity purchased for KDC DUB 1 and KDC DUB 2 are 100% renewable, generated by wind energy.

ENVIRONMENTAL MANAGEMENT

Sustainable management of data centres is a crucial aspect of the Manager’s strategy to grow business value into the future. Electricity and water data are compiled from utility bills while fuel data is compiled from onsite meter readings. These data are analysed on a regular basis to help inform investment and business decisions.

Energy Consumption

GRI 103-1 | 103-2 | 103-3 | 302-1

In 2019, Keppel DC REIT’s colocation facilities consumed a total of 1,233,647 GJ of energy, comprising consumption of electricity 1,219,070 GJ and diesel fuel 14,577 GJ. Out of the total electricity consumed, about 223,099 GJ or 18.1% of electricity was sourced from renewable sources.

The Manager is committed to improving energy efficiency in the long term. While overall electricity usage is expected to increase as the REIT’s asset base grows, the Manager will continue to assess and implement new measures to optimise energy efficiency and usage intensity.

Water Consumption

GRI 103-1 | 103-2 | 103-3 | 303-1

Data centres require water to support the chilled water-cooling systems, which are necessary to maintain ideal environmental conditions for mission-critical IT equipment.

The REIT consumed a total of 361,256 m<sup>3</sup> of water, which was measured through direct metering. About 99% of consumption was from municipal sources. This represents a 6% increase from 2018’s total consumption of 341,126 m<sup>3</sup>, due primarily to the full year data contribution from KDC SGP 5 where clients ramped up their activities.



Water resources are carefully managed through constant monitoring of consumption rates, implementing strategies to improve water usage intensity and evaluating subsequent performance. For instance, the majority of the REIT's colocation assets are equipped with water recirculation technology to minimise water consumption.

**Conservation Efforts**

The Manager works in collaboration with its facility managers, including Keppel Data Centres Holding, the data centre division of its sponsor Keppel Telecommunications & Transportation (Keppel T&T), to implement initiatives aimed at reducing environmental impact while complying with all local environmental regulations.

Some of these energy and water conservation measures include:

- Technology-refresh on key equipment including chillers, cooling towers, and Diesel Rotary Uninterruptible Power

Supply devices, to improve energy performance and lengthen the life span of the equipment.

- Ongoing asset enhancement works at KDC DUB 1 aims to improve the energy and water efficiency system. These include the replacement of computer room air conditioning (CRAC) with newer and better performance units, which will reduce both electricity and water usage.

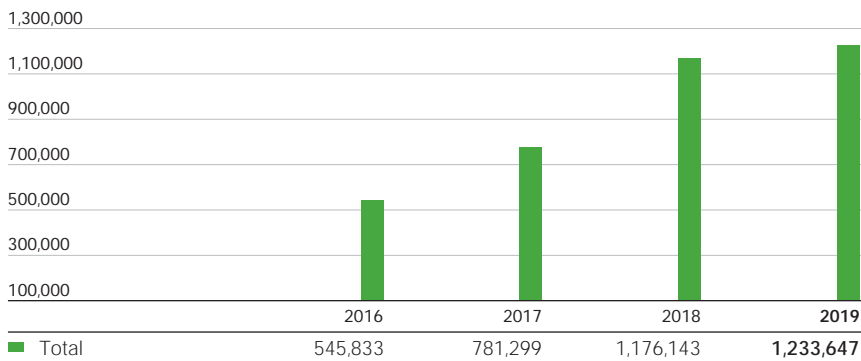
**Environmental Compliance**

GRI 103-1 | 103-2 | 103-3 | 307-1

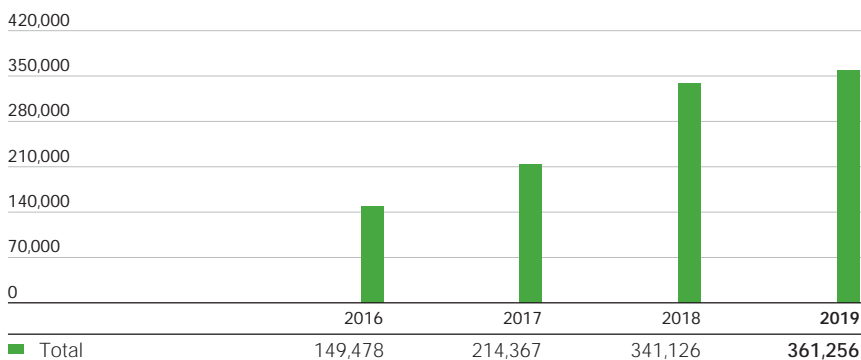
The Manager exercises responsibility in reducing the REIT's environmental impact and conserving resources, and ensures adherence and compliance with all applicable national and international environmental regulations and guidelines across its operations.

In 2019, there were zero cases of non-compliance with environmental laws and regulations.

**ENERGY CONSUMPTION PER ANNUM (GJ)**



**WATER CONSUMPTION PER ANNUM (m³)**



## RESPONSIBLE BUSINESS

**THE MANAGER IS COMMITTED TO UPHOLD STRONG CORPORATE GOVERNANCE, MINIMISE RISKS, ENSURE RESPONSIBLE SUPPLY CHAIN PRACTICES AND DELIVER QUALITY SOLUTIONS.**

### ECONOMIC SUSTAINABILITY

GRI 102-7 | 103-1 | 103-2 | 103-3 | 201-1

The Manager's primary responsibility is to provide Keppel DC REIT's Unitholders with regular and stable distributions, as well as achieve long-term growth while maintaining an optimal capital structure.

In implementing this strategy, material ESG issues are managed as financially material risks and opportunities. The Manager understands that ESG issues such as energy efficiency can reduce costs while employee engagement can improve staff retention.

Keppel DC REIT continued to deliver distribution per Unit (DPU) growth to its Unitholders in 2019. Results of financial performance are communicated through quarterly and annual reports, as well as

various stakeholder engagement platforms. The financial performance highlights can be found on pages 8 to 9. More information on Keppel DC REIT's economic strategies and asset enhancement initiatives can be found on pages 3 and 58, as well as pages 32 to 35 respectively.

### CORPORATE GOVERNANCE AND RISK MANAGEMENT

GRI 102-16 | 102-11 | 418-1

The Manager is committed to upholding sound corporate governance as it is key to Keppel DC REIT's ongoing journey towards achieving business excellence.

The oversight role of the Keppel DC REIT Board, with a majority of independent directors, brings objectivity to the Board in its decision making and safeguards the rights and interests of Unitholders.

At Singapore Corporate Awards 2019, Keppel DC REIT was conferred the Silver Award for Best Investor Relations in the REITs and Business Trusts category.



The Manager is committed to the timely and accurate disclosure of material information, and employs various platforms of engagement with the investment community.

More information on Keppel DC REIT's corporate governance guidelines and practices are available on pages 143 to 163.

The Manager adopts a holistic and systematic risk management framework that identifies, evaluates and manages risks throughout its decision-making processes. Sustainability factors are among the key risks considered when evaluating investment opportunities and business operations.

The Manager adopts a comprehensive risk management framework that assesses both traditional corporate risks as well as emerging ESG and meta risks. Considerations of long-term sustainability are factored into the evaluation of potential investments and business opportunities. External risks, such as interest rate fluctuation and foreign currency exposure are also closely monitored and mitigated where appropriate.

Keppel DC REIT's Risk Management Framework is designed to safeguard long-term value. The framework ensures that the Manager and the facility managers are adequately prepared to handle and adapt to potential threats and disruptions to business continuity.

Sustainability and business continuity are intricately linked and therefore integral to the Keppel DC REIT Enterprise Risk Management Framework. The framework ensures that the Manager and the facility managers address and manage potential threats and disruptions to business.

The Manager is committed to reduce the environmental impact of its operations and has included environmental and social aspects in its robust risk management processes. For more details on Keppel DC REIT's risk management strategy, please refer to pages 59 to 60.

### **COMPLIANCE, ANTI-BRIBERY AND ANTI-CORRUPTION MEASURES**

GRI 103-1 | 103-2 | 103-3 | 205-2 | 205-3 | 206-1 | 307-1 | 419-1

The Manager is committed to upholding strong ethical business practices. The Manager believes that anti-bribery and anti-corruption measures are important in protecting the REIT's brand equity and ensuring business continuity. The Manager

regularly communicates key policy requirements to all employees and directors.

As part of the onboarding process, all new employees are required to declare conflicts of interest and are briefed on the Keppel Group Code of Conduct, Anti-bribery Policy and Whistle-blowing procedures.

These policies are communicated and reinforced to all employees on an annual basis through exercises such as online training courses and declarations of adherence to Keppel Group policies. Employees are required to declare any conflicts of interest at least annually and as necessary throughout the year.

In addition, these policies are readily available to employees through an online portal. Internal and external audits are conducted to ensure compliance with all relevant regulations pertaining to ethical business practices. Controls are put in place to ensure that all financial, operational, compliance and information technology processes are conducted ethically. Additional details of such policies are available on pages 59 to 60.

It is a requirement for all Keppel employees and Board members to receive communication and training on anti-corruption policies and procedures annually. Employees are also reminded to avoid business dealings with partners who may be viewed as unethical, illegal or otherwise inconsistent with applicable policies.

The Manager complies with all relevant laws and regulations where it operates. Its zero-tolerance policy on bribery translates to a target of zero incidents of corruption as well as zero violations of laws, regulations and voluntary standards related to ESG issues. The Manager's stance includes policies and regulations related to anti-competitive behaviour, anti-corruption, as well as socioeconomic and environmental compliance.

The Manager is not aware of any reportable instances of non-compliance, corruption or violations of laws, regulations and voluntary standards pertaining to the environment and the provision, use, health and safety of products and services of the Manager.

The Manager's efforts and initiatives were recognised at the 2019 Securities Investors Association Singapore (SIAS) where Keppel DC REIT was conferred the Most Transparent Company Award under the REITs and Business Trusts category.

## RESPONSIBLE BUSINESS

### SUPPLY CHAIN AND RESPONSIBLE PROCUREMENT

GRI 102-9 | 103-1 | 103-2 | 103-3

Keppel DC REIT's supply chain comprises primarily mechanical and electrical equipment suppliers and facility management service providers for physical security, technical maintenance and cleaning services. Keppel DC REIT contributes to the local economy by procuring locally-sourced products and working with local suppliers and partners, which also facilitates logistical efficiency.

A reliable and responsible supply chain helps optimise operations and safeguard business continuity. To ensure best practices and high quality services throughout the supply chain, the Manager assesses the track record, quality and reputation of potential suppliers and partners. In addition, sustainability policies, performance, procedures, accreditations and certifications are also considered in the assessment to mitigate supply chain risks.

In 2019, one new supplier was added to the supply chain.

In 2016, the Keppel Group implemented the Keppel Supplier Code of Conduct to implement Keppel's sustainability values across the REIT's supply chain. Key suppliers are required to abide by the code, which outlines expectations related to business conduct, anti-corruption,

labour practices, safety and health, as well as environmental management.

Safe work method statements outline agreed practices with suppliers. They are continually reviewed, updated and aligned with the suppliers and partners.

There were no known instances of supplier non-compliance with any applicable regulations regarding human rights and labour practices. There were no operations or suppliers with significant risks of forced or compulsory labour practices.

### PRODUCT QUALITY AND SAFETY

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

#### Building and Service Excellence

Keppel DC REIT's portfolio comprises high technical specifications and operational resilience that aligns with international standards. The REIT's global clientele includes internet enterprises, financial institutions, and information technology services with strict service-level requirements for high operational resilience. A breakdown of the REIT's client profile by trade sector is available on page 32 to 52.

Data centres involve mission critical operations where clients' privacy, physical security and minimal downtime of the facilities are of utmost importance.

The premises and clients' IT systems are well protected with robust round-the-clock

physical security systems against the risk of unauthorised entry. Standard operating procedures within the facilities mandate that all visitors must be pre-approved and registered in advance with clients or the Manager. Processes and measures such as the non-display of client directories or logos at the facilities are also in place to safeguard clients' privacy.

The Manager places strong emphasis on Business Continuity Management (BCM) to ensure the resilience of the REIT's data centres. BCM exercises are carried out regularly to prepare for, prevent and mitigate risks through measures such as robust power outage scenario planning, as well as fire and influenza pandemic drills.

To ensure operational excellence, all equipment are routinely repaired and tested. Maintaining strict operating processes and standards for high infrastructure quality enables the Manager to support clients' needs and ensure operational excellence.

The Manager collects annual feedback from its colocation clients relating to the physical security, building and service standards of the facilities. In 2019, the Manager achieved above-average ratings. In addition, there were zero reported cases of contractual breaches of customer privacy, and operations across all facilities complied with local regulations and standards.

A list of accreditations and certifications attained by Keppel DC REIT's assets is shown below.  
GRI 102-12

### SUSTAINABILITY AWARDS, ACCREDITATIONS AND CERTIFICATIONS

Asset	Award/Accreditation/Certification
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	SS 564 Part-1:2013 Energy & Environment Management System
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	ISO 50001:2011 Energy Management System
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	SS 507:2015 Standard for Business Continuity/Disaster Facilities Recovery Services (BC/DR)
KDC SGP 1 and KDC SGP 3	SS 577:2012 Water Efficiency Management System
KDC SGP 1, KDC SGP 2, and KDC SGP 3	Water Efficient Building by PUB
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	ISO 46001:2019 – Water Efficiency Management Systems (WEMS)
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	Biz Safe Level Star
KDC SGP 2	BCA-IMDA Green Mark for Data Centres 2015 Gold <sup>PLUS</sup> Award
KDC SGP 3	BCA-IMDA Green Mark for Data Centres 2014 Platinum Award
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	ANSI/TIA-942-B:2017 – Rated 3
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	ISO 45001:2018 Occupational Health and Safety Management Systems
KDC SGP 1, KDC SGP 2, KDC SGP 3, KDC SGP 5, Basis Bay DC and Gore Hill DC	ISO/IEC 27001:2013 Information Security Management System
KDC DUB 1 and KDC DUB 2	ISO 27001:2013 Information Security Management System
KDC SGP 1, KDC SGP 2, KDC SGP 3, KDC SGP 5 and KDC DUB 1	ISO 9001:2015 Quality Management System
KDC DUB 1 and KDC DUB 2	ISO 37001:2016 Anti-Bribery Management System
KDC SGP 1, KDC SGP 2, KDC SGP 3 and KDC SGP 5	ISO 14001:2015 Environmental Management System

## PEOPLE AND COMMUNITY

### THROUGH ENGAGING AND EMPOWERING ITS PEOPLE AND THE COMMUNITY, THE MANAGER BUILDS A SUSTAINABLE BUSINESS.

The Manager recognises that people are at the core of its business. Investing in a motivated and competent workforce helps to ensure sustainable business value.

The Manager is committed to build up its talent pool through continual investments in training and development, as well as staff welfare. This is accomplished by focusing efforts in five key areas:

1. Making a difference: Provide platforms for employees to contribute in their own meaningful way
2. Having a voice: Allow sharing of ideas on improvement
3. Feeling valued: Build a culture of recognition and appreciation
4. Growing a career: Enhance career through self-directed learning
5. Inspiring to grow: Inspire others through leading by example

#### LABOUR PRACTICES, TALENT MANAGEMENT AND HUMAN RIGHTS

##### Profile of Employees

GRI 102-7 | 102-8 | 103-1 | 103-2 | 103-3 | 405-1

As of 31 December 2019, the Manager has a total headcount of 20 full-time permanent employees. In 2019, the dedicated Investment, Asset Management and Finance headcounts are seconded from Keppel Capital to the Manager. The Manager added 16 secondees consisting of 12 males

and four females, of whom 12 were between 30-50 years old and four were under 30 years old. There was a voluntary resignation of a male between 30-50 years old. All staff were recruited locally and are based in Singapore.

The Manager continues to be supported by Keppel Capital's workforce in functions such as Investor Relations, Risk and Compliance, Human Resources, Information Technology, Legal and Corporate Secretarial.

As of 31 December 2019, the Board consists of seven directors, one of whom is female.

##### Diversity and Inclusion

GRI 102-41 | 103-1 | 103-2 | 103-3 | 405-1

The Manager's commitment to diversity and inclusion is based on the belief that this can foster innovation and business value when a multitude of cultures, values and perspectives work together.

Recruitment and advancement opportunities are based purely on merit, competence and job fit. The Manager is fully committed to equal opportunities, regardless of race, religion, gender, marital status or age. This policy ensures that all candidates are treated fairly and that the most suited candidates are selected to advance their careers. As at 31 December 2019, the workforce is 30% female and 70% male.

Keppel DC REIT cultivates a motivated and competent workforce.



PEOPLE AND COMMUNITY

The Manager strives to uphold the Employer’s Pledge of Fair Employment Practices which is guided by the five principles below:

1. Recruit and select employees on the basis of merit (such as skills, experience or ability to perform the job), and regardless of age, race, gender, religion, marital status and family responsibilities or disability;
2. Treat employees fairly and with respect, and implement progressive human resource management systems;
3. Provide employees with equal opportunities to be considered for training and development based on their strengths and needs to help them achieve their full potential;
4. Reward employees based on their ability, performance, contribution and experience; and
5. Abide by labour laws and adopt the Tripartite Guidelines on Fair Employment Practices.

As a member of the Keppel Group, the Manager adopts the Keppel Group Statement on Diversity and Inclusion. This statement outlines diversity considerations that are incorporated into the Keppel Group Code of Conduct, as well as put into practice in staff recruitment, retention, development and performance, thereby fostering an inclusive and harmonious workplace. It also articulates and reinforces the Group’s policy on non-discrimination, reinforcing core values of people-centredness and collective strength. The rules apply to all employees and are consistent with the Corporate Statement on Human Rights of the Keppel Group that is available online on Keppel Corporation’s website.

There were zero reported incidences of discrimination raised by the Manager’s employees in 2019. None of the Manager’s employees are under any collective bargaining agreements.

**Provision of Benefits**

The Manager complies with all relevant regulations regarding employee benefits.

All permanent employees of the Manager are provided with group insurance plans, medical coverage, leave entitlements and contributions to the local pension fund i.e. the Central Provident Fund in Singapore.

Employees also enjoy competitive and sustainable compensation, paternity and maternity leave, leave for childcare, marriage, compassionate grounds, and examination, as well as additional benefits such as flexible credit points that are awarded to employees for redemption on a host of benefits such as wellness classes or healthcare subsidies. These benefits form part of the Manager’s strategy of attracting and retaining top talent.

**Performance Management**

GRI 103-1 | 103-2 | 103-3 | 404-3

The Manager operates under a performance-based human resource strategy designed to align individual and collective goals. This strategy fosters a culture of motivation, promotes high-performance, as well as the fair distribution of benefits and opportunities, thus optimising long-term value for all stakeholders. This strategy is supported by a robust performance management system based on regular performance and career development reviews. The system is designed to recognise merit by offering opportunities for advancement, promotion, recognition of achievements, compensation, training and other conditions of employment.

During reviews, supervisors and employees discuss performance objectives based on targets that are aligned with the four key areas of the Manager’s scorecard, which are Financial, Process, Customers & Stakeholders and People. Each year, 100% of employees receive performance and career development reviews.

**Succession Planning and Talent Management**

The Manager implements succession planning and talent management as a key tool to ensure business continuity. These plans are reviewed with the senior

management biannually and shared with the board, to ensure high potential employees are well poised for advancement and leadership.

In addition, the Manager leverages the Keppel Group’s talent management processes, which are centralised at the corporate level.

Keppel Group’s Human Resources organises and manages performance data across business units to ensure a fair and in-depth review of talent. It also develops talent through various leadership and executive development programmes such as the Keppel Young Leaders and Advanced Leaders Programme. These platforms develop high-potential employees at different levels, spur innovative thinking and harness the collective strengths of business units across the Keppel Group.

The Keppel Leadership Institute was launched in 2015, and exemplifies the Group’s commitment to develop future leaders to take on new leadership responsibilities, tackle emerging business challenges and capitalise on the opportunities of the future.

**Training and Development**

GRI 103-1 | 103-2 | 103-3 | 404-1

The Manager invests in its workforce. Various training and education programmes are implemented to develop valuable skill sets and allow employees to adapt to

**AVERAGE TRAINING HOURS BY GENDER**

Female		29.2
Male		26.7


**AVERAGE TRAINING HOURS BY EMPLOYEE CATEGORY**

Managerial		26.0
Executive		27.8

 **EMPLOYEE DEVELOPMENT**

**Objectives**  
Nurture, develop and empower staff to realise their best potential

**Approach**  
Performance management, talent management, learning and development

 **EMPLOYEE WELL-BEING**

**Objectives**  
Enhance overall staff wellness

**Approach**  
Promote wellness to foster a healthy workforce

 **EMPLOYEE ENGAGEMENT**

**Objectives**  
Foster a cohesive identity within the company and provide open feedback channels

**Approach**  
Encourage open two-way communication, rewards and recognition system, as well as team-building

industry trends and evolving business landscapes. Training opportunities are customised based on employees' respective responsibilities, career stages, ambitions and potential.

To ensure employees stay competitive in the changing landscape, leadership programmes such as the Advanced Leaders Programme, designed in conjunction with INSEAD, promote strategic thinking and equip employees with skills to better use their judgement to make decisions. For emerging leaders, a residential leadership programme was designed in collaboration with Nanyang Technology University to build competence to transit from operational leadership to strategic leadership.

Training and education management is measured based on the average hours of training that each employee receives. In 2019, the average number of training hours per full-time employee was 27.4 hours.

To further increase engagement and awareness, Keppel Capital also organised its inaugural Career Day on 28 June 2019. The aim of the event was to encourage employees to take charge of their own learning and career development. At the Career Day booths, employees learned how to plan their career and initiate conversations on their career goals, gained a deeper understanding of their individual working styles, and were introduced to various learning platforms that they can sign up for via Workday and Udemy.

### Employee Engagement

Engaging employees fosters motivation, productivity and high morale in the workplace.

All Keppel Group entities participated in the Keppel Group's 2019 Employee Engagement Survey. The survey is designed to measure employee engagement, employee satisfaction and collect feedback to continually improve policies, processes and the satisfaction of employee needs. The survey was administered by an external consultant. The Manager saw 100% participation rate by its employees. Results of the survey were used to improve engagement initiatives and gain insights into its employees' perspectives. The survey results showed high levels of engagement and satisfaction among the Manager's employees, and provided insights for the Manager to implement new initiatives or improve existing ones.

To promote interaction, the workplace includes a bistro-style pantry, as well as discussion and relaxation zones throughout the office. To boost employees' morale, events such as Appreciation Day provide



senior management a chance to thank everyone for their hard work. To foster greater collaboration and recognition among employees, a digital platform known as K'Kudos was launched to enable employees to appreciate those who have gone the extra mile.

### OCCUPATIONAL HEALTH AND SAFETY

#### Employee Wellness

The Keppel Group and the Manager implemented various activities to promote health and physical well-being. Examples include providing employees with fruits, regular health screening programmes as well as lunch time health talks. At the Group level, the annual Keppel Games engage employees in friendly competitions across the organisation to promote exercise and teamwork. Other corporate activities were conducted throughout the year to further build bonds between team members.

As a key aspect of general well-being, the Manager believes in the importance of strong family relationships. Employees are encouraged to spend quality time with their families. The Manager participates in family initiatives such as 'Eat with Your Family Day' organised by the Centre for Fathering, a non-profit organisation that promotes the importance of family ties and recognises families as the basic unit of society. To further encourage family bonding time, corporate passes are provided for popular family destinations such as the Singapore Zoo and River Safari.

The Manager is committed to providing a work environment that promotes productivity, collaboration and overall well-being. For example, the Manager's office in Singapore incorporated an Indoor Air Quality management system to monitor air quality and ventilation, and ergonomic furniture are provided.

#### Health and Safety

GRI 103-1 | 103-2 | 103-3 | 403-2

Safety is one of Keppel's core values. The Manager is committed to provide a safe work environment for all employees and stakeholders. The Manager targets zero workplace health and safety incidents. To achieve this goal, the Manager works closely with the facility managers to implement industry best practices. Periodic inspections and maintenance of facilities and equipment are conducted by qualified specialists who help to ensure proper implementation of all relevant safety standards.

All the REIT's assets are equipped with fire protection systems to ensure safety and business continuity. All visitors, employees, and clients are briefed on emergency evacuation routes and procedures in the event of a fire. Evacuation routes are also shown throughout the facility at different locations.

In the rare case of an incident, all details are documented through a systematic incident reporting system to be thoroughly

PEOPLE AND COMMUNITY



In 2019, the Manager and other Keppel Capital volunteers undertook about 1,380 hours of community service.

reviewed by senior management and relevant safety personnel. This information is used to identify root causes, corrective measures and any additional preventative measures to minimise the risk of similar incidents occurring. This information is also used to evaluate the effectiveness of the Manager’s health and safety management response.

In 2019, there were zero fatalities and reportable health and safety incidents.

The Manager will continue to uphold high safety standards, implement best practices, and foster a strong safety culture. Keppel Capital introduced a Health & Wellness Month in October, which consisted of a series of talks and events such as booths selling healthy snacks, fruits and other health-related products.

In order to heighten safety awareness, a series of safety and wellness events were also conducted at the Group-level. Some of these are listed below:

**SAFETY EVENTS**

<b>Office Safety Site Inspection</b>	Conducted safety inspection of Keppel Capital’s office.
<b>Fire Safety Awareness Training</b>	Invited speaker from FIRE Specialist Rescue Centre Singapore to raise awareness of Fire Safety among Keppel Capital staff.
<b>Global Safety Timeout (GSTO)</b>	GSTO is held annually to promote a strong safety culture.
<b>Ministry of No Accident Health Talk</b>	Health talk for Keppel Capital employees about improving the quality of life, through making informed dietary choices, adopting an active lifestyle and promoting work-life balance.
<b>Waves of Safety Messages</b>	Keppel Capital HSE Committee members contribute to daily safety message postings on Yammer, an enterprise social online network.

**COMMUNITY DEVELOPMENT**

GRI 201-1

The Manager believes in doing well by doing good. As a responsible corporate citizen, the Manager supports initiatives that uplift the community. The Manager works with Keppel Capital to give back to the community.

In 2019, Keppel Capital continued to support its adopted charity, Muscular Dystrophy Association (Singapore) (MDAS), a self-help organisation committed to uplift the lives of people with muscular dystrophy. Keppel Capital has been a partner of MDAS since 2016 and believes that a long-term partnership with the organisation would enable it to more meaningfully contribute and make a difference.

Together with Keppel Capital, the Manager participated in several workshops with MDAS beneficiaries during the year, which include Coffee Art on Canvas, Clay Making, as well as Prata Flipping.

The Manager also joined Keppel Capital in other volunteer activities. During the Keppel Community Month in August, Keppel Capital hosted about 50 seniors at an Urban

Gardening event at Thye Hua Kwan Senior Services @ Taman Jurong. In October, Keppel Capital, in collaboration with Keppel T&T, spent Children’s Day bowling with about 60 children from New Life Children and Student Care Centre.

In Ireland, the team took part in the DCs for Bees event organised by Host in Ireland, the first industry-wide initiative which aims to reverse the rapid decline of the bee population in Ireland through the creation of safe habitats for bees. Together with participants from 19 other companies in the data centre industry, about 2,000 saplings were planted. The saplings, comprising a mix of native Oak, Birch and Rowan, will grow into trees that will provide food and shelter for animals, birds and insects, including bees.

In 2019, the Manager and other Keppel Capital volunteers dedicated about 1,380 hours of community service to engage with community members and improve the lives of the underprivileged. In addition, the Manager contributed \$25,000 to Keppel Care Foundation to support various philanthropic programmes.



## GRI CONTENT INDEX

This report has been prepared in accordance with GRI standards: Core option.

GRI Standard	Disclosure Number	Disclosure Title	Page Reference
GRI 101: Foundation 2016			
<b>Organisational Profile</b>			
GRI 102: General Disclosures 2016	102-1	Name of the organisation	Backcover
	102-2	Activities, brands, products, and services	3, 32 to 52
	102-3	Location of headquarters	Backcover
	102-4	Location of operations	3, 22 to 23, 36 to 40, 63
	102-5	Ownership and legal form	3, 10 to 11
	102-6	Markets served	24 to 31
	102-7	Scale of the organisation	2, 8 to 9, 22 to 23, 73
	102-8	Information on employees and other workers	73
	102-9	Supply chain	72
	102-10	Significant changes to organisation and its supply chain	4 to 7, 17, 32
	102-11	Precautionary Principle or approach	59 to 60, 70 to 71
	102-12	External initiatives	64, 72
	102-13	Membership of associations	64
<b>Strategy</b>			
102-14	Statement from senior decision-maker	62	
<b>Ethics and Integrity</b>			
102-16	Values, principles, standards, and norms of behaviour	Inside Front Cover, 3, 61 to 62, 64, 156	
<b>Governance</b>			
102-18	Governance structure	10 to 11, 64	
<b>Stakeholder Engagement</b>			
102-40	List of stakeholder groups	65	
102-41	Collective bargaining agreements	74	
102-42	Identifying and selecting stakeholders	64 to 65	
102-43	Approach to stakeholder engagement	64 to 65	
102-44	Key topics and concerns raised	65	
<b>Reporting Practice</b>			
102-45	Entities included in the consolidated financial statements	22 to 23, 32	
102-46	Defining report content and topic Boundaries	63	
102-47	List of material topics	66	
102-48	Restatements of information	Scope 2 GHG emissions do not include that of KDC DUB 1 and KDC DUB 2 as these assets use 100% renewable sources for electricity generation. Therefore, 2018 figures have been restated as these were included in the calculations last year. Old figure: 139,888 tCO <sub>2</sub> e New figure: 110,895 tCO <sub>2</sub> e	
102-49	Changes in reporting	No changes	
102-50	Reporting period	63	
102-51	Date of most recent report	The 2018 sustainability report was published in March 2019.	
102-52	Reporting cycle	63	
102-53	Contact point for questions regarding the report	63	
102-54	Claims of reporting in accordance with the GRI Standards	63	
102-55	GRI content index	77 to 79	
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<b>Economic Performance</b>			
GRI 201: Economic Performance 2016	103-1	Explanation of the material topic and its Boundary	3 to 7, 53, 63, 70
	103-2	The management approach and its components	3 to 7, 54 to 58, 66, 70
	103-3	Evaluation of the management approach	3 to 7, 70
	201-1	Direct economic value generated and distributed	2, 8 to 9, 53 to 58, 76
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GRI 204: Procurement Practices 2016	103-1	Explanation of the material topic and its Boundary	63, 72
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<b>Anti-Corruption</b>			
GRI 205: Anti-Corruption 2016	103-1	Explanation of the material topic and its Boundary	59 to 60, 63, 66, 71 to 72
	103-2	The management approach and its components	66, 71 to 72
	103-3	Evaluation of the management approach	71 to 72
	205-2	Communication and training about anti-corruption policies and procedures	71 to 72
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GRI 206: Anti-Competitive Behaviour 2016	103-1	Explanation of the material topic and its Boundary	63, 71
	103-2	The management approach and its components	66, 71
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GRI 302: Energy 2016	103-1	Explanation of the material topic and its Boundary	63, 68
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<b>Water</b>			
GRI 303: Water 2016	103-1	Explanation of the material topic and its Boundary	63, 68 to 69
	103-2	The management approach and its components	66, 68 to 69
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<b>Emissions</b>			
GRI 305: Emissions 2016	103-1	Explanation of the material topic and its Boundary	63, 67
	103-2	The management approach and its components	66, 67 to 68
	103-3	Evaluation of the management approach	67
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<b>Environmental Compliance</b>			
GRI 307: Environmental Compliance 2016	103-1	Explanation of the material topic and its Boundary	69
	103-2	The management approach and its components	66, 69
	103-3	Evaluation of the management approach	69
	307-1	Non-compliance with environmental laws and regulations	69

GRI Standard	Disclosure Number	Disclosure Title	Page Reference
<b>CATEGORY: SOCIAL</b>			
<b>Employment</b>			
GRI 401: Employment 2016	103-1	Explanation of the material topic and its Boundary	64, 73 to 74
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<b>Occupational Health and Safety</b>			
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	103-2	The management approach and its components	67, 75 to 76
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