

TIL ENVIRO LIMITED

達力環保有限公司

(Incorporated in the Cayman Islands with limited liability)

Stock Code : 1790

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2018



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ABOUT THIS REPORT

TIL Enviro Limited (the “Company” together with its subsidiaries, collectively, “we”, “us”, “our” or the “Group”) is pleased to present our first annual Environmental, Social and Governance Report (the “Report”) to provide an overview of the Group’s management of significant issues affecting the operation, including environmental, social and governance (“ESG”) issues.

The Board has overall responsibility for the Group’s ESG strategy and reporting. The Board is responsible for evaluating and determining the Group’s ESG-related risks and ensuring that appropriate and effective ESG risk management and internal control systems are in place.

REPORTING PERIOD

The Report illustrated the Group’s initiative and performance on the environmental and social aspects for the period from 1 January 2018 to 31 December 2018 (the “Reporting Period”).

REPORTING SCOPE

This Report covers the Group’s main subsidiary, namely Taliworks (Yinchuan) Wastewater Treatment Co., Ltd* (達力(銀川)污水處理有限公司), in Yinchuan (being the capital city of Ningxia) which is principally engaged in the wastewater treatment business in the People’s Republic of China (the “PRC”).

REPORTING BASIS

This Report was prepared in accordance to the Environmental, Social, and Governance Reporting Guide (“ESG Reporting Guide”) set out in Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “Listing Rules”). The Group has complied with the disclosure requirements of the “comply or explain” provisions set out in the ESG Reporting Guide. In view of our first time disclosure of certain key performance indicators (“KPIs”), which is considered as material by the Group, during the Reporting Period, the Group will continue to optimize and improve the disclosure of KPIs. This Report was prepared and published in both English and Chinese. In the event of contradiction or inconsistency, the English version shall prevail. For more information on our corporate governance, please refer to the “Corporate Governance Report” on pages 32 to 43 of the annual report of the Company for the year ended 31 December 2018.

STAKEHOLDERS ENGAGEMENT

The Group emphasized on the participation of its key stakeholders, including employees, customers, government and suppliers etc. All of them had a substantial impact on the success of the Group’s businesses or activities.

In compiling the Report, the Group consulted its internal stakeholders to monitor and manage its impact on all aspects of the environment and society. Besides, the Group has established various engagement channels for its stakeholders to understand their concerns regarding the Group’s operation. The Group believes that stakeholders’ engagement has significant level of influence in developing sustainable strategies to fulfill social responsibilities, which is the basis for the Group’s strategy formulation and decision-making.

The Group welcomes feedback from stakeholders on our sustainability initiatives as stated in the Report. Please do not hesitate to send your feedback to us at info@tilenviro.com.

* For identification purposes only

A. ENVIRONMENTAL ASPECTS

ASPECT A1: EMISSIONS

To demonstrate commitment to sustainable development and compliance with laws and regulations relating to environmental protection, the Group endeavors to minimise the environmental impact of the business activities and maintain green operations and green office practices.

The Group's wastewater treatment business is an environmental protection business. We currently operate and manage a total of four wastewater treatment facilities with a designed capacity of approximately 375,000 m³ per day with average treated water quality higher than the highest treated wastewater standard in the National Wastewater Discharge Standards (GB18918-2002) ("Class IA standard"). As a wastewater treatment service provider, the Group is subjected to various laws and regulations regarding environmental protection and the discharged standard of treated wastewater from our wastewater treatment plants. For the upgrading and expansion work at our wastewater treatment plants, we have engaged a licensed environmental impact assessment consultant to assist us in preparing the environmental impact assessment report to the relevant government authorities for approval prior to the commencement of the construction works. For our provision of wastewater treatment services, we have duly obtained a pollutant discharge permit for each of our wastewater treatment plants in accordance with the PRC law. Pursuant to the concession agreement signed with Yinchuan Construction Bureau (the "Concession Agreement"), we are also obliged to ensure the wastewater treated by our facilities meet the relevant discharge standards. For this purpose, we have implemented various quality control measures as detailed in "Aspect B6: Product Responsibility" in this Report.

The Group has implemented measures in the operation of our business to ensure strict compliance with the relevant laws and regulations in the PRC, including but not limited to PRC Environmental Protection Law* (《中華人民共和國環境保護法》) and the PRC Law on Prevention and Control of Water Pollution* (《中華人民共和國水污染防治法》). Such measures and procedures include, amongst other things, waste gases emission, wastewater treatment and solid waste management:

Emissions:	Source:	Measures:
Waste gases	Waste gases emissions were mainly derived from malodorous gases generated during the wastewater treatment process.	<ul style="list-style-type: none">— In upgrading and expanding the wastewater treatment plant, the Group adopted advanced sewage treatment technology and equipment, and optimized the layout of facilities such as building a covers around the treatment plant to reduce the odor.— Afforestation work in the sewage treatment plant area and its surroundings is enhanced to reduce the influence of odor on the environment.

* For identification purposes only

A. ENVIRONMENTAL ASPECTS

Emissions:	Source:	Measures:
Wastewater	Inflow of wastewater from the external pipeline network in Yinchuan.	<ul style="list-style-type: none"> — The discharge of the treated wastewater were required to fulfill relevant standards, such as Urban Wastewater Treatment Plant Discharge Standards* (城鎮污水處理廠污染物排放標準) (GB18918–2002), before being ultimately discharged into the Yellow River. — The Group adopted intercept processing to improve the efficiency of pollutant treatment in the wastewater. — The Group has laboratories situated within certain wastewater treatment plants, where regular laboratory analyses are performed on the water samples collected at the inflow and outflow of each of our wastewater treatment plants as mentioned in “Aspect B6: Product Responsibility” in this Report.
Solid waste	The solid waste mainly consist of sludge, chemical sample waste and household waste generated from the treatment process.	<ul style="list-style-type: none"> — In order to dispose of the large amount of sludge generated in the wastewater treatment process in a “harmless, reduced and resource-based” way, the sludge, upon concentration and dehydration and other treatments by the Group, was transported to disposal sites designated by the local government. — The Group strictly abides by the standardized management regulations for solid waste produced in the course of production, experimentation, or inspection and maintenance, then performs sorted collection, centralized storage, regular reporting, and compliant disposal.

During the Reporting Period, there was no material breach or non-compliance with the applicable laws and regulations related to environmental protection.

Regarding hazardous and non-hazardous wastes, our hazardous waste produced mainly consists of chemical sample waste in daily operation. Non-hazardous waste includes mainly sludge and household waste. The Group has a strict classification system for different types of wastes. Each type of wastes has specific storage location and collection procedures. There is a precaution implemented for the leakage of waste to prevent pollution. Wastes are separately stored and handled with the ledger for record.

During the Reporting Period, the Group generated/consumed no significant hazardous waste and packaging materials due to its business nature.

* For identification purposes only

A. ENVIRONMENTAL ASPECTS

Our wastewater treatment process helped to reduce the emission of large amount of Chemical Oxygen Demand ("COD"), ammonia, phosphorus and other substances in urban sewage and protected the natural environment. During the Reporting Period, the main effluents such as COD, ammonia and phosphorus were 42%, 77% and 70%, respectively, which were lower than the emission limits of Class IA standard (lowest percentage is disclosed among the 4 wastewater treatment plants). During the Reporting Period, the Group's main wastewater and solid waste were as follows:

Type of discharge	Unit	Figures
Total discharge of urban sewage reaching wastewater discharge standards	m ³	11,339,562
COD reduction for urban sewage discharge	tonnes	5,472,590
Discharge of COD from urban sewage	tonnes	492,086
Ammoniacal nitrogen reduction for urban sewage discharge	tonnes	334,527
Discharge of ammoniacal nitrogen from urban sewage	tonnes	109,527
Phosphorus reduction for urban sewage discharge	tonnes	94,435
Discharge of phosphorus from urban sewage	tonnes	4,987
Non-hazardous waste (i.e. Sludge)	tonnes	104,220
Intensity of non-hazardous waste	tonnes/m ²	0.24

Major air pollutants emission from vehicles during the Reporting Period were as follows:

Type of Air Pollutants	Air Pollutant Emission (kg)
Sulphur Oxides (SO _x)	164.72
Nitrogen Oxides (NO _x)	4,023.70
Particulate Matter (PM)	224.65

During the Reporting Period, the greenhouse gas ("GHG") emission from the operation is set out below:

Type of GHG emissions	Equivalent CO ₂ emission (kg)
Scope 1 Direct emissions	801,400.23
Scope 2 Indirect emissions	37,809,124.22
Total	38,610,524.45
Intensity (kg/m²)	88.69

Note:

The calculation of the GHG gas is based on the "A Corporate Accounting and Reporting Standard" from The GHG Protocol.

Scope 1: Direct emissions from vehicles that are owned by the Group

Scope 2: Indirect emissions from the generation of purchased electricity consumed by the Group

Scope 3 is not disclosed as it is an optional disclosure and the corresponding emission is not controlled by the Group

A. ENVIRONMENTAL ASPECTS

ASPECT A2: USE OF RESOURCES

The Group places high priority on the efficient use of resources. The major resources used by the Group are electricity, water and paper. The Group strives to improve the efficient use of natural resources, such as minimising waste/emissions and implementing effective recycling program. Practical measures are implemented as follows.

Electricity

Electricity saving measures such as electrical appliances were encouraged to be set at energy saving mode where possible. The offices' air conditioning systems were set at 25°C. For office computers, the monitors were automatically set to idle mode if left unattended within 20 minutes or less. Also, power supply should be switched off when they were not in use. Preference was given to office equipment with relatively high energy efficiency.

Energy consumption by the Group during the Reporting Period is set out as below:

Type of energy	Energy consumed (kWh)
Unleaded Petrol	258,211.44
Diesel	2,751,318.92
Compressed Natural Gas ("CNG")	128,639.44
Purchased electricity	46,340,958.00
Total	49,479,127.80
Energy intensity (kWh/m²)	113.66

Water

The Group did not encounter any problems in sourcing water for its plants usage. Recycled water generated by the Group is sold to customers for industrial use and landscaping purposes, with sales of recycled water amounting to approximately 4,679,873 m³ in 2018. The Group encourages the staff to reduce water wastage, for example, by emphasizing the water saving initiatives in the offices, advocating employees to turn off faucets timely and eliminating the phenomenon of running water. The Group also promotes the use of water saving sanitary and water distribution appliances. During the Reporting Period, the total consumption of the water and water intensity per area of plants were 213,800 m³ and 0.49 m³/m², respectively.

Fuel consumption for motor vehicles

The Group actively identified aged vehicles and modified their engines from petrol/diesel type to CNG type with less emissions.

ASPECT A3: THE ENVIRONMENT AND NATURAL RESOURCES

The Group raises staff's awareness on environmental issues through education and training and enlists employees' support in improving the Group's performance, promotes environmental awareness amongst the customers, business partners and shareholders and support community activities in relation to environmental protection and sustainability and evaluates regularly and monitors past and present business activities impacting upon health, safety and environmental matters. With the integration of policies and measures mentioned in sections "Aspect A1: Emissions" and "Aspect A2: Use of Resources", the Group strives to minimise the impacts to the environment and natural resources.

B. SOCIAL ASPECTS

ASPECT B1: EMPLOYMENT

The Group believes that a key to our success is our ability to recruit, retain, motivate and develop talented and experienced staff members. We endeavor to attract and retain appropriate and suitable personnel to serve our Group. Our Group assesses the existing employees on a continuous basis and will determine whether additional personnel are required to cope with the business development of our Group. The Group's employment handbook sets out our standards for compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.

The Group entered into separate labour contracts with each of our employees in accordance with the applicable labour laws of the PRC. The package includes basic wages, over-time work allowances, bonuses, social insurance and housing funds, retirement benefits and other staff benefits. We conduct annual review of the performance of our employees for determining the level of bonus, salary adjustment and promotion of our employees. The Group recruits employees from the open market based on various factors, such as their work experience, educational background, qualifications or certifications possessed. We believe that the above arrangement can maintain good relationship with our employees.

During the Reporting Period, there was no material labour dispute brought against the Group or its employees.

Below is a detailed breakdown of our employees by gender, age group and employment category as at 31 December 2018:

	Number of staff	% of total
By gender		
Male	104	68
Female	48	32
Total	152	100
By age group		
30 or below	43	28
31–40	60	40
41–50	40	26
51 or above	9	6
Total	152	100
By employment category		
General and Technical Staff	136	89
Middle-level	13	9
Senior management	3	2
Total	152	100

B. SOCIAL ASPECTS

Below is a detailed breakdown of our employees turnover rate by gender and age group during the Reporting Period:

Turnover rate by gender

Male	34%
Female	23%

Turnover rate by age group

30 or below	58%
31–40	13%
41–50	13%
51 or above	Nil

ASPECT B2: HEALTH AND SAFETY

The Group places emphasis on occupational health and work safety in our four wastewater treatment plants. Pursuant to the national and local health and safety laws and regulations in the PRC, we are required to provide our employees with a safe working environment. Therefore, we have established comprehensive work place safety policies and guidelines for our employees. Each of our wastewater treatment facilities maintains its own emergency reporting system in case of safety hazards. Our employees are provided with protective gears and clothing within our wastewater treatment plants. We also conduct regular inspection and maintenance checks on our equipment to ensure that they are in compliance with the applicable national or industrial standards in respect of their design, manufacturing, installation and use. Regarding insurance, the Group contributes to social insurance for its employees in accordance with the applicable laws and regulations. We have also maintained property all risks insurance, machinery breakdown insurance, employer's liability insurance and public liability insurance for the operation of our wastewater treatment plants.

During the Reporting Period, there were no material non-compliance cases noted in relation to health and safety laws and regulations.

ASPECT B3: DEVELOPMENT AND TRAINING

The Group recognises the importance of providing training for the development of our employees. To ensure the performance quality of our employees and their health and safety at work place and to familiarise our employees with our quality control systems, we offer relevant in-house training to our staff at our wastewater treatment facility. We also encourage our employees in attending external industry-related trainings by providing subsidy as established in our employment handbook.

Below is a detailed breakdown of the percentage of employees trained by gender and employment category during the Reporting period:

Trained employee by gender

Male	95%
Female	98%

Trained employee by employment category

General and Technical Staff	99%
Middle-level	85%
Senior management	Nil

B. SOCIAL ASPECTS

The average training hours for employees by gender and employment category during the Reporting Period are as follows:

Average training hours by gender	Hours per employee
Male	23.48
Female	8.75
Average training hours by employment category	
General and Technical Staff	19.85
Middle-level	12.46
Senior management	Nil

ASPECT B4: LABOUR STANDARDS

The Group strictly complies with relevant labour laws and regulations in the PRC. The Group prohibits the use of child labour and forced labour that violate fundamental human rights and also poses threat to sustainable social and economic development. Employment contracts and other records, documenting all relevant details of the employees (including age) are properly maintained for verification by relevant statutory body upon request.

During the Reporting Period, we did not identify any issues related to child labor or forced labor within the Group.

ASPECT B5: SUPPLY CHAIN MANAGEMENT

The Group works closely with its suppliers who are committed to high quality, environmental, health and safety standards. Our principal suppliers were construction contractors, design institutes and supervision agencies engaged by us to carry out our contemplated upgrading and expansion works, suppliers of chemicals used in our wastewater treatment processes and suppliers of materials for equipment maintenance and replacements. It is our general policy to maintain a list of approved suppliers in order to avoid over-relying on a single supplier. We have stable business relationships with our suppliers and they are familiar with our demand on quantity and requirements as to the quality of the materials and equipment required by us.

For procurement of materials and equipment and construction-related services within the scope of our contemplated upgrading and expansion works, we must go through tender processes irrespective of the purchase or subcontracting amounts. During such process, a tender document will be issued by us to the suppliers who are invited to submit their tenders. A tender committee with several members will be established, comprising a majority of independent third party representatives chosen by balloting from a pool of local industry experts selected by the local government, and the remaining being representative(s) from us. Such tender committee will evaluate the bids taking into consideration the factors including but not limited to qualification, expertise, price, past performance, quality of material and payment terms of the bidders. Such committee will then rank the bidders based on the result of evaluation. Generally, we will enter into the procurement contract with the bidder who has the highest ranking.

For procurement of materials and equipment not related to our contemplated upgrading and expansion works, we have established a centralised internal procurement policy for the selection of suppliers. Depending on the type of materials, equipment or services to be procured, if the purchase amount is expected to exceed a certain threshold, we will invite multiple suppliers to provide quotations for our selection.

Thus, we believe that there are no significant environmental and social risks for our management decision on supply chain management during the Reporting Period.

B. SOCIAL ASPECTS

ASPECT B6: PRODUCT RESPONSIBILITY

Quality control

The Group has actively pursued strict and standardised quality control procedures and monitoring systems such that the operators will carry out routine inspection on our wastewater treatment plants. This is to ensure stable operations and avoid any disruption to our operations.

Quality control team

Our quality control team consists of 10 members, with one of them being the quality control manager, all of whom possess relevant academic qualifications and the necessary industry experience to perform laboratory analyses on incoming and outflowing wastewater.

Examination of water quality

We have laboratories situated within certain of our wastewater treatment plants, where regular laboratory analyses are performed on the water samples collected at the inflow and outflow of each of our wastewater treatment plants. The water samples are collected on a regular basis from the wastewater treatment plants. In the event the levels of pollutants in the incoming wastewater were found to have exceeded the designed parameters, our technical team will be alerted and take necessary measures to ensure the outflow water quality meets the relevant standards. If the pollutants in the incoming wastewater significantly exceed the design of products such that our outflow water quality may be affected, we will promptly report to the relevant governmental authorities. Under the Concession Agreement, we shall not be liable for not meeting the relevant discharge standard and in case we suffer any loss due to such kind of incident not caused by our own fault, we are entitled to compensation from local government.

Online real-time monitoring by government

Each of our wastewater treatment facilities has a sensor installed at its outflow pipes which transmits the key parameter data directly to the local environmental protection bureau for monitoring the quality of wastewater treated by our facilities on real-time basis. Such online real-time sensors and meters are maintained and controlled by independent third parties designated by the local government.

Inspection of chemicals

Certain chemicals are used by us during wastewater treatment process. Our quality control team will perform regular analysis on such chemicals procured by us to ensure the quality is up to standard. Any substandard quality of chemicals will be reported to the plant manager and/or our senior management for investigation and decision making together with follow up actions. This is to ensure our treated wastewater meets all the prescribed discharge standard/parameters.

B. SOCIAL ASPECTS

Regular inspection

For every two hours, inspections are carried out by our operating team in order to avoid disruptions to our operations. Any unusual circumstances will be reported to the manager of the plant and/or our senior management for investigation and decision-making together with follow up actions and report to environmental related government authorities, if necessary. Electronic tracking devices are installed at various locations within the plant to ensure that such regular inspections are carried out on schedule.

Regular maintenance of instruments and equipment

To avoid disruptions to our operations, our in-house team of technicians will carry out regular repair and maintenance on all the facilities and equipment. In some occasions where we need external supports on the repair and maintenance works, we will hire external specialists to help us perform necessary repair and maintenance in order to avoid any disruption to our operations.

During the Reporting Period, there was no disputes between our Group and our customers in respect of the quality of work performed by us and there were no cases of non-compliance against laws and regulations related to products responsibilities.

ASPECT B7: ANTI-CORRUPTION

To ensure the workplace operates in a fair and transparent manner, the Group has formulated whistleblowing policy to avoid suspected corruption and provided channels such as by letter, fax, meeting, email or phone call for employees to report suspected corruption. If there is any suspected case related to corruption, employees are encouraged to report it through the mentioned channels. All these practical actions enhance the sense of belonging and fair play among our various stakeholders.

The Group has been in strict compliance with law and regulation related to anti-corruption. During the Reporting Period, there was no any legal case regarding corrupt practices brought against the Group or its employees.

ASPECT B8: COMMUNITY INVESTMENT

As a socially responsible company, the Group is committed to understanding the needs of the communities in which we operate. The Group strives to develop long-term relationship with our stakeholders and seek to make contributions to programmes that have a positive impact on community development.

During the Reporting Period, the Group organised an activity in delivering souvenirs to the traffic policemen and sanitation workers who held their posts in the cold winter as an expression of gratitude. Our management took the initiative to lead our employees to actively participate in experiencing the daily work routines of the traffic policemen and sanitation workers.

REFERENCES TO THE ESG REPORTING GUIDE

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
A. Environmental			
Aspect A1: Emissions			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer, relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	Emissions	3–5
KPI A1.1	The types of emissions and respective emissions data.	Emissions	5
KPI A1.2	Greenhouse gas emissions in total and intensity.	Emissions	5
KPI A1.3	Total hazardous waste produced and intensity.	No material hazardous waste produced during the Reporting Period	N/A
KPI A1.4	Total non-hazardous waste produced and intensity	Emissions	5
KPI A1.5	Description of measures to mitigate emissions and results achieved.	Emissions	3–4
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, reduction initiatives and results achieved.	Emissions	4

REFERENCES TO THE ESG REPORTING GUIDE

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Aspect A2: Use of Resources			
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	Use of Resources	6
KPI A2.1	Direct and/or indirect energy consumption by type in total and intensity.	Use of Resources	6
KPI A2.2	Water consumption in total and intensity.	Use of Resources	6
KPI A2.3	Description of energy use efficiency initiatives and results achieved.	Use of Resources	6
KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency initiatives and results achieved.	Use of Resources	6
KPI A2.5	Total packaging material used for finished products and with reference to per unit produced.	No packaging material was produced during the Reporting Period	N/A
Aspect A3: The Environment and Natural Resources			
General Disclosure	Policies on minimizing the issuer's significant impact on the environment and natural resources.	Emissions and Use of Resources	6
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	Emissions, Use of Resources and The Environment and Natural Resources	6

REFERENCES TO THE ESG REPORTING GUIDE

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
B. Social (Note)			
Employment and Labour Practices			
Aspect B1: Employment			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfare.	Employment	7–8
Aspect B2: Health and Safety			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer, relating to providing a safe working environment and protecting employees from occupational hazards.	Health and Safety	8
Aspect B3: Development and Training			
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	Development and Training	8–9
Aspect B4: Labour Standards			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	Labour Standards	9

REFERENCES TO THE ESG REPORTING GUIDE

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Operating Practices			
Aspect B5: Supply Chain Management			
General Disclosure	Policies on managing environmental and social risks of the supply chain	Supply Chain Management	9
Aspect B6: Product Responsibility			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer, relating to health and safety, advertising, labeling and privacy matters relating to products and services provided and methods of redress.	Product Responsibility	10–11
Aspect B7: Anti-corruption			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer, relating to bribery, extortion, fraud and money laundering.	Anti- Corruption	11
Community			
Aspect B8: Community Investment			
General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	Community Investment	11

Note:

Pursuant to Appendix 27 of the Listing Rules, KPIs in this section are recommended disclosures only.