

(Incorporated in the Cayman Islands with limited liability)

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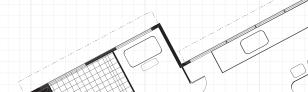


## 1 WHO WE ARE



Founded in 2009, Sanbase Corporation Limited and its subsidiaries (collectively referred to as "Sanbase" or the "Group") provide a wide range of integrated interior fit-out solutions for clients whose offices are predominately situated at Grade A offices in Hong Kong and the People's Republic of China (the "PRC").

Over the past decade, the Group has devoted itself to high-quality, cost-effective and timely renovation and fitting-out project management. Expanding to serve over 120 prominent companies, predominantly financial institutions, insurance companies, and other multinational companies, the Group strives to continuously optimize its services catering to clients' needs.





## 2 ABOUT THIS REPORT

### 2.1 REPORTING STANDARD, PERIOD AND SCOPE

This is Sanbase's second Environmental, Social and Governance ("**ESG**") report, and is prepared in accordance with the Environmental, Social, and Governance Reporting Guide, set out in Appendix 20 of the Rules Governing the Listing of Securities on the GEM of The Stock Exchange of Hong Kong Limited.

This report covers the ESG-related activities from 1 April 2018 to 31 March 2019 (the "Reporting Period"). The scope of the report covers the Group's operations at offices of Hong Kong and the PRC, and over 180 construction sites. Our projects can be broadly categorized into (i) bare shell fit-out, (ii) restacking, (iii) reinstatement, (iv) design, (v) churn work, (vi) maintenance and others.







#### 2.2 CONTACT INFORMATION

We place great value on comments and suggestions from our stakeholders. If you have any comments or suggestions, please contact us at:

16/F, Loon Kee Building, 267–275 Des Voeux Road Central, Hong Kong

Email: ir@sanbase.com.hk

Website: sanbase.com.hk



## 3 MESSAGE FROM THE CHAIRMAN

#### Dear stakeholders,

On behalf of the board of directors (the "**Directors**"), I am pleased to present you our second publication of the ESG report. It highlights the progress we have made in our sustainable development during the Reporting Period. Balancing environmental stewardship, social well-being and business growth, Sanbase strives to lay the groundwork to reinforce our management approach to corporate sustainability.

As one of the leading renovation and fitting-out service providers, Sanbase is committed to maintaining operational excellence through comprehensive supply chain management and meticulous quality assurance. This year we continued to strictly adhere to the **ISO 9001:2015 Quality Management System** standards for high-quality products and service to the satisfaction of clients.

To show care and support to the community, the Group puts our resources and professional expertise in renovation and fitting-out to good use. In this regard, we are thrilled to support the Bus Regeneration Programme, which converts retired buses into learning space for local schools by providing free floor laying and handrail colouring services. Additionally, we pursue constant efforts to foster community engagement through volunteering and donations.

With the people-centric core value, the Group equips its employees with on-the-job training and on-going coaching in order to facilitate their professional development and help the business flourish. Besides, safety and well-being of our employees are our top priority so we endeavor to maintain the highest level of occupational health and safety under the framework of OHSAS 18001:2007 Occupational Health & Safety Management System.

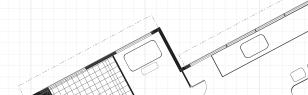
In response to the pressing issue of climate change and other types of pollution, Sanbase, as a responsible company, is dedicated to protecting our environment and minimizing carbon footprint throughout our business operation. On account of the proactive formulation of our environmental policy in accordance with ISO 14001:2015 Environmental Management Systems, we guarantee energy efficiency, proper waste management and full compliance with relevant laws and regulations.

Last but not least, I would like to extend my sincere gratitude to all of our stakeholders, particularly our employees. With their hard work and support, Sanbase embarks on another fruitful and sustainable year. Building on this success, we pledge to work together to continue paving the way for a greener working and living environment in the years to come.

**WONG Sai Chuen** 

Chairman, Chief Executive Officer and Executive Director

Hong Kong, 17 September 2019





## 4 OPERATIONAL EXCELLENCE

Placing strong emphasis on quality of products and operational efficiency, Sanbase scrutinized every process from procurement to production to ensure that high-quality products and services were delivered to the satisfaction of clients. During the Reporting Period, the Group was committed to incorporating comprehensive supply chain management as well as stringent quality control into its daily business practice.

#### 4.1 MANAGING THE SUPPLY CHAIN

Sanbase believes that proper and systematic supply chain management is crucial for delivering premium interior fitting out services to the clients and sustaining its business growth in the long run. With its internally formalized and approved sub-contractor list as well as multiple price quotations, Sanbase wisely selected vendors and sub-contractors offering reliable, cost-effective and high-quality services. The Group also reviewed and confirmed that the vendors and sub-contractors not only possessed the necessary licenses and qualifications, but also complied with labor and environmental standards.

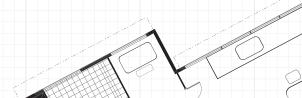
In addition to eligible sub-contractors, the quality of raw materials is another key factor in determining the standards of the Group's service. Hence, Sanbase had its well-defined internal control policy in place to procure suitable raw materials by considering their quality, pricing and environmental performance.

#### 4.2 ASSURING QUALITY OF SERVICES AND PRODUCTS

In an effort to fulfil product responsibility and maintain consistent product quality, Sanbase has implemented the ISO 9001:2015 Quality Management System since 2014. The quality management system elucidates requirements for consistent improvement of quality assurance in design, development, production, installation and services concerning renovation and fitting-out works.

Upon the completion of projects by the sub-contractors and vendors, the Group then conducted formal periodic reviews and quality evaluation in a bid to assess and keep track of the performance of the sub-contractors and vendors on a regular basis.



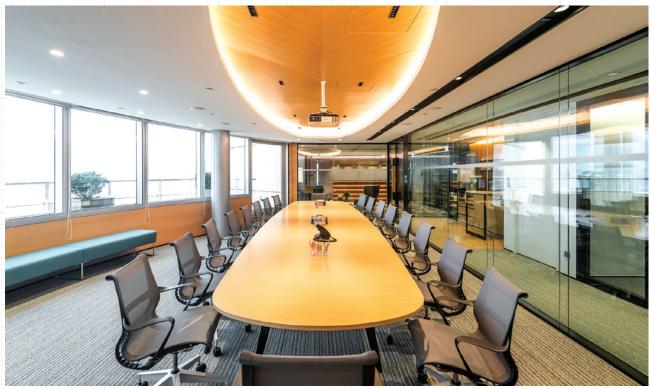




## **4 DPERATIONAL EXCELLENCE**











With meticulous quality assurance, the Group was not aware of any incidents of non-compliance with the laws and regulations concerning health and safety, advertising, labelling and privacy matters relating to products and services provided during the Reporting Period.



## **5 COMMUNITY INVESTMENT**

On top of product responsibility, the Group also proactively shouldered social responsibility and fostered community integration. In this regard, Sanbase, as a devoted integrated interior fit-out service provider, made the most of its resources to lend the community a helping hand. By giving back to the community through donation and active participation in a wide variety of activities, the Group strives to continue engaging the community, and spreading love and care in the Group and also the society.

#### **5.1 ENGAGING THE COMMUNITY**

Case Study: Supporting Bus Regeneration Programme

The Group believes that every industry has its own way of putting the community forward and making a positive impact on the society. As one of the responsible interior fit-out service providers, Sanbase hopes to improve the lives of others by carrying out various high-quality fit-out works for them in a charitable way.

In a new initiative with The Kowloon Motor Bus Co (1933) Ltd, the Group was honored to support Bus Regeneration Programme, which aimed to turn retired buses to learning space for local schools and non-profit organizations. Through providing free floor laying and handrail colouring services, the Group built a comfortable learning environment for the students at Sam Shui Natives Association Huen King Wing School in January 2019.

# The Group provided free laying and handrail colouring services in support of Bus Regeneration Programme











## **5 COMMUNITY INVESTMENT**

During the Reporting Period, Sanbase actively enrolled in various external community engagement activities so as to grasp the opportunities to serve all ages. Sanbase and its staff were dedicated to raising funds for the patients suffering from cancer and ongoing cancer research projects. The Group engaged its employees to join the fundraising walkathon entitled "Stride for a Cure" in November 2018 and succeeded in raising HK\$3,700.

Additionally, cordially invited by the University of Hong Kong and The Hong Kong Polytechnic University, Sanbase attended their Careers Fair in January and March 2019 respectively, where the Group shared with the university students its industry insights and advices on career planning.

# "Stride for a Cure" fundraising walkathon 2018



#### Careers Fair at PolyU and HKU 2019





During the Reporting Period, Sanbase also supported various charitable causes including TWGHs MK Cancer Treatment Subsidy Fund of Tung Wah Group of Hospitals, as well as Medecins Sans Frontieres (Doctors Without Borders) by making donations of totally HK\$65,000.



During the Reporting Period, the Group had spent a total of HK\$73,700 on the community and its employees have volunteered over 470 hours.





## **5 COMMUNITY INVESTMENT**

#### 5.2 FOSTERING EMPLOYEE RELATIONSHIP

Viewing its employees as an important part of the community where the Group operates, Sanbase is devoted to creating a friendly workplace and strengthening employees' sense of belonging to the corporation.

During the Reporting Period, Sanbase organized various activities such as Mid-Autumn Festival Dinner, Christmas Party, and other company events for employees. At these events, the Group was very keen to communicate with the employees, solicit their feedback about the Group, and appreciate their hard work. In addition, the Group's employees also attended the Chinese New Year Banquet organized by Hong Kong General Chamber of Commerce, sharing the joy of the festival.

#### **Christmas Party**



Chinese New Year Banquet of Hong Kong General Chamber of Commerce



Mid-Autumn Festival Dinner





## **6 PEOPLE-CENTRIC WORKPLACE**

Credits must be given to the Group's employees for the successful aforementioned community outreach. In addition, the Group believes that its employees are a bridge between its business and clients, providing premium fit-out services for the clients in a professional way. With people-oriented policies on various aspects including encouraging ethical employment and labor practice, reinforcing training and development, and building a safe working environment, Sanbase created a satisfactory workplace for its employee as best it could.

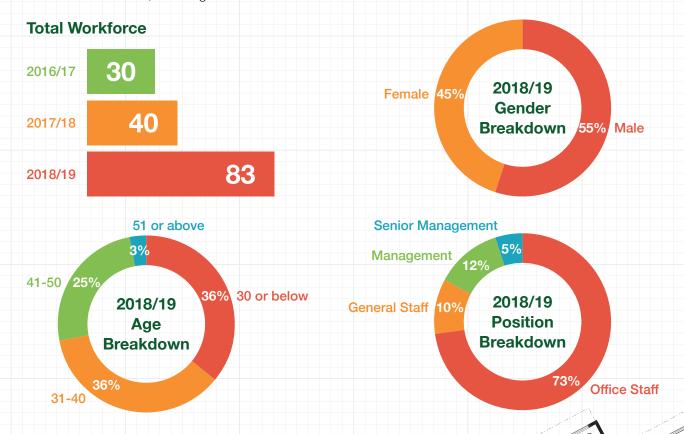
#### **6.1 PROMOTING ETHICAL EMPLOYMENT**

As a company advocating diversity and equal opportunities in the workplace, Sanbase sets out its equality policy, in which the Group appointed the human resources department to assess all existing and potential employees based solely on their individual ability to the jobs. The Group pursued efforts to create a workplace that is free from discrimination and harassment of any kinds such as age, gender, race, religion, sexual orientation and disability.

With zero tolerance of unfair, offensive and humiliating acts, the Group advises employees to bring suspicious issues relating to discrimination and harassment to the attention of the department head, the associate director or the Directors. This will be immediately followed by investigation and processing of the complaints.

Meanwhile, strongly committed to promoting work-life balance and thereby employees' well-being, Sanbase guaranteed reasonable working hours for employees and provided them with paid holidays as well as special leaves including maternity and paternity leave.

During the Reporting Period, the Group has complied with all relevant laws and regulations relating to employment and labor standards, such as Employment Ordinance (Cap.57), Employees' Compensation Ordinance (Cap.282), and Minimum Wage Ordinance (Cap.608). At the end of the Reporting Period, the Group had a total of 83 staff, including Directors. The total workforce and its breakdowns are as follows:





## 6 PEDPLE-CENTRIC WORKPLACE

#### **6.2 ADVOCATING INTEGRITY AND ANTI-CORRUPTION**

Attaching great importance to business ethics and integrity, Sanbase had put in place anti-fraud policy. The policy not only defines misconduct and dishonesty, but it also empowers every employee to report any suspicious breach of the policy. Moreover, with the aim of proactively combating corruption in the workplace, supervisors have additional responsibilities for monitoring the existing anti-fraud practices and reviewing its effectiveness on a regular basis.

In order to enhance their ethical awareness and knowledge on anti-corruption law and to ensure all employees adhere to high standard of integrity, Sanbase organized the Independent Commission Against Corruption (ICAC) integrity training workshops for them. On account of robust and effective anti-corruption operation, the Group had complied with laws and regulations relating to bribery, extortion, fraud and money laundering, and no concluded legal cases regarding corrupt practices brought against the Group during the Reporting Period.

Additionally, to avoid infringement of human rights, the Group prohibited all use of child and forced labor. Therefore, the human resource department was responsible for verifying candidates' age by referring to their valid identity cards before the commencement of work. During the Reporting Period, there were no cases of non-compliance with laws and regulations related to child and forced labour.

#### **6.3 SAFEGUARDING OCCUPATIONAL HEALTH AND SAFETY**

Sanbase recognized workplace safety and health as an integral part of its business operations. With strict adherence to the framework of OHSAS 18001:2007 Health and Safety Management System, Sanbase maintained an accident rate of less than 1 accident per 100,000 man-hours during the Reporting Period by implementing the following work safety measures:





feedback and suggestions concerning site safety from frontline workers A



Assessing the effectiveness of current safety and health systems and objectives regularly to respond to the latest standards and practices

R



Rewarding the construction project teams and the respective subcontractors who have demonstrated workplace safety with annual Safety Awards

Ensuring frontline workers use appropriate personal protective equipment such as helmets, harnesses and goggles during work

\*

a site
contingency
plan which lists
out the steps
to request for
emergency
service from
corresponding
local
government
departments

Unveiling subcontractor safety performance reports to evaluate their provision of safety instruction and supervision



Leading safety committee meetings quarterly to engage delegates from project management, safety group and site management



## **6 PEOPLE-CENTRIC WORKPLACE**

In addition, to enhance employees' awareness of workplace hazards and equip them with occupational safety knowledge, the Group arranged induction safety and tool box training programmes for its employees from different units, the topics of which include but not limited to site housekeeping, safe use of different renovation tools and demolition work. During the Reporting Period, Sanbase offered a total of 99 hours of the safety training for its employees.



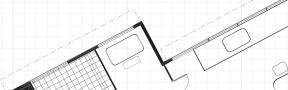
In compliance with the laws and regulations in relation to occupational safety and health, the Group was not aware of any work-related injuries or fatalities reported during the Reporting Period. The Group endeavors to continuously maintain a safe and healthy work environment and eliminate risks for employees' well-being.

#### **6.4 NURTURING TALENTS**

With the aim of encouraging employees to enrich their knowledge and keep abreast of changes and practices in the industry, Sanbase offered training sponsorship of conferences, forums and seminars that are deemed relevant to their jobs and beneficial to their professional development and operational efficiency of the Group.

During the Reporting Period, Sanbase had sponsored its employees for a total of 23.5 hours to attend external training programs from symposiums to courses and workshops. In addition, Sanbase also provided its staff with first aid certificate courses including the Hong Kong St. John Ambulance and the Hong Kong Red Cross to nurture first aiders and promote safety awareness in the workplace. The Group strives to continue reinforcing the employees with more professional knowledge.

As for new hires, the Group assigned the department delegates to conduct on-going coaching and give corresponding performance feedback to them. Meanwhile, the Group provided staff with formal review and appraisal at least once a year in the hope of facilitating professional development and addressing work-related needs of employees.





## **7 ENVIRONMENTAL PROTECTION**

Striking a balance between business growth and sustainable development, Sanbase was dedicated to embedding environmental protection in its daily operating practice. The Group had identified several environmental issues that were regarded as relatively material to its operation, including energy usage, greenhouse gas emissions and non-hazardous waste generation. Together with employees, Sanbase pledges to optimize resources while minimizing the environmental impacts in the future.

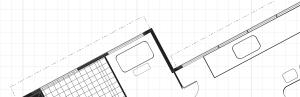
#### 7.1 DUR ENVIRONMENTAL POLICY

According to ISO 14001:2015 Environmental Management Systems, the Group formulated environmental policy to ensure proper environmental stewardship and that all on-site activities and office operation comply with all relevant environmental legal standards. The environmental policy was outlined below:

- Setting up site environmental inspection checklist to ensure proper implementation of related measures on various environmental aspects
- Continuously reinforcing the Group's environmental management system
- Promoting sustainable use of resources such as energy, water and paper
- Educating employees about environmental issues and applicable laws and regulations in respect of their work
- Developing appropriate emergency contingency plans as required by legislation to respond to significant environmental hazards

Not only was the policy implemented and communicated well at all levels within the corporation, its effectiveness was assessed yearly through knowledge sharing and management review meetings. As a result, during the Reporting Period, the Group had complied with the following laws and regulations:

Category	Relevant Laws and Regulations
General	Environmental Impact Assessment Ordinance (Cap. 499)
General	Hong Kong Planning Standards and Guidelines
	Air Pollution Control Ordinance (Cap. 311)
Air	Hong Kong Air Quality Objectives
	Air Pollution Control (Construction Dust) Regulation (Cap. 311R)
	Summary Offences Ordinance (Cap. 228)
	Factories and Industrial Undertakings Ordinance (Cap. 59)
	Waste Disposal Ordinance (Cap. 354)
Waste	Waste Disposal (Chemical Waste) (General) Regulations (Cap. 354C)
Waoto	Public Cleansing and Prevention of Nuisances (Regional Council) By-Law (Cap. 132BJ)
	Practice Note for Authorised Persons 144: Control of Environmental Nuisance from Construction Sites (August 1997)
	Public Health and Municipal Services Ordinance (Cap. 132)





## 7 ENVIRONMENTAL PROTECTION

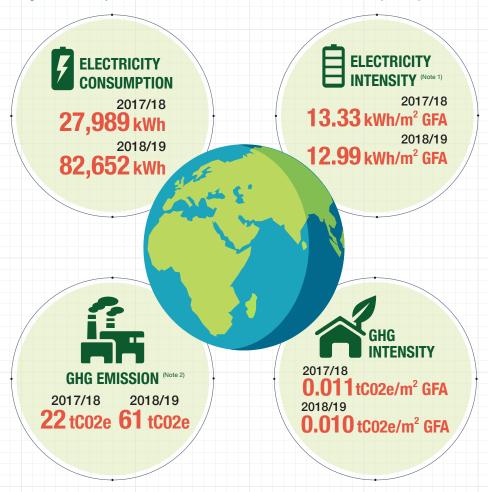
#### 7.2 ENERGY CONSUMPTION & GREENHOUSE GASES

Sanbase is aware that electricity is the major contributor of its energy usage, mainly incurring the Group's carbon footprint. Thus, the Group had taken a proactive approach to implement energy-saving initiatives for both on-site operation and site offices, from using low-impact LED lighting devices to switching off idling lightings and electrical appliances. Additionally, Sanbase showed support and actively participated in Earth Hour, the international "lights out" campaign held on 30 March 2019 with the aim of reducing its greenhouse gas emission.

#### Earth Hour 2019



## Electricity Consumption and Greenhouse Gas Emission (GHG) Performance



Note 1: GFA refers to Gross Floor Area in square meter

Note 2: Sanbase's greenhouse gas emission is derived from Scope 2 indirect emissions from purchased electricity by the offices of Hong Kong and the PRC

During the Reporting Period, the Group noticed increases in electricity consumption and GHG emission. This was mainly due to the difference in reporting scope, as in the number of offices during the Reporting Period, referring to two offices in Hong Kong and one office in the PRC, is greater than that during the previous reporting period. On a regular basis, the Group will review the applicable energy consumption and GHG emission indicators for monitoring the associated performance.



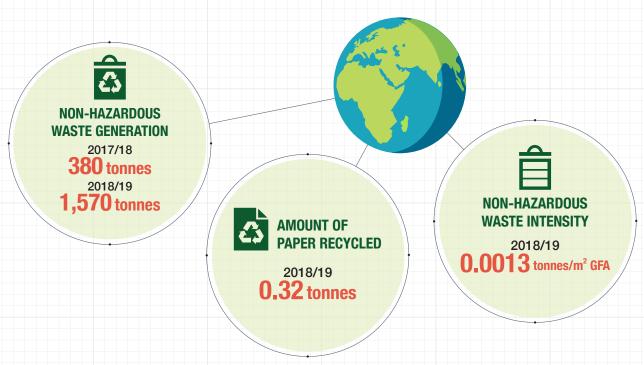
## 7 ENVIRONMENTAL PROTECTION

#### 7.3 WASTE MANAGEMENT

Sustainable management of waste is one of the key pillars underpinning environmental protection of Sanbase. The non-hazardous waste that the Group mainly generated in daily operation referred to paper, plastic and metal. Through proper classification and clean recycling with the use of recycling facilities at designated areas, Sanbase engaged employees to cut down on waste at source.

Particularly, the Group set up a waste paper collection box to promote reuse and recycling of paper at office. During the Reporting Period, the Group had recycled 0.32 tonnes of paper while 1,570 tonnes of general waste generated on site had undergone appropriate sorting, storage and treatment by qualified waste management and recycling companies.

Compared to the previous reporting period, the Group attributed an increase in generation of non-hazardous waste to rises in the number and scale of projects. The project area involved during the Reporting Period was 1.21 million m², which was 16% larger than that during the previous reporting period. As a result, it led to a boost in the Group's revenue as well, increasing from HK\$376 million in 2018 to HK\$650 million in 2019. The Group will strive to explore feasible means of waste management to reduce its waste footprint of business operation and products.



Recycling bins for sorting

Waste paper collection box for reuse and recycling



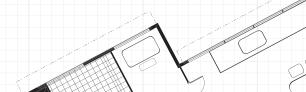




## 8 LOOKING FORWARD

The emerging importance of ESG drives our efforts to find effective solutions to steer Sanbase towards sustainable development. In the upcoming years, the Group will continue its pursuit of operational perfection and responsible business so as to provide our clients with efficient delivery of high-quality products and services while minimizing environmental impacts throughout our business and operation.

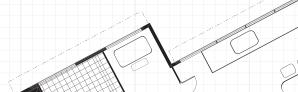
Owing to a series of measures and concerted endeavors over the past years, the Group has attained zero complaints about product quality, zero work-related injuries and zero reported cases of non-compliance with all laws and regulations in relation to our business. Inspired by our duty of care towards the environment, the community and our employees, we are confident that the environmental and social initiatives will be successfully executed again in 2020 and beyond.





## 9 ESG CONTENT INDEX

Aspect / Description / KPI		Statement/Section	Page No.
	A. ENVIRONME	NTAL	
A1 Emissions			
A1	General Disclosure - Information on: (a) the policies; and (b) compliance	7 Environmental Protection	14
A1.1	The types of emissions and respective emissions data.	7.2 Energy Consumption & Greenhouse Gases	15
A1.2	Greenhouse gas emissions in total (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	7.2 Energy Consumption & Greenhouse Gases	15
A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Hazardous waste is regarded as not material to the Group's operation since the Group does not directly deal with any hazardous waste. Therefore, the relevant data are not disclosed.	N/A
A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	7.3 Waste Management	16
A1.5	Description of measures to mitigate emissions and results achieved.	7.1 Our Environmental Policy	14
A1.6	Description of how hazardous and non-hazardous wastes are handled, reduction initiatives and results achieved.	7.3 Waste Management	16
A2 Use of Resources			
A2	General Disclosure - Policies	7 Environmental Protection	14
A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	7.2 Energy Consumption & Greenhouse Gases	15
A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	The water consumption is not disclosed since the water usage of the main business activities was supplied by the clients/properties and not provided to the Group.	N/A
A2.3	Description of energy use efficiency initiatives and results achieved.	7.2 Energy Consumption & Greenhouse Gases	15
A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency initiatives and results achieved.	As water was solely provided by municipal utility provider, there were no particular issues with regards to sourcing water. Therefore, the relevant data are not disclosed.	N/A





## S ESG CONTENT INDEX

Aspect	/ Description / KPI	Statement/Section	Page No.		
A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Packaging material is not material to the Group's operation because the Group does not produce any packaging material. Therefore, the relevant data are not disclosed.	N/A		
A3 The	Environment and Natural Resources				
A3	General Disclosure - Policies	7 Environmental Protection	14		
A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	7 Environmental Protection	14		
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B1	General Disclosure - Information on: (a) the policies; and (b) compliance	6.1 Promoting Ethical Employment	11		
B1.1	Total workforce by gender, employment type, age group and geographical region.	6.1 Promoting Ethical Employment	11		
B1.2	Employee turnover rate by gender, age group and geographical region.	Not disclosed	N/A		
B2 Hea	B2 Health and Safety				
B2	General Disclosure - Information on: (a) the policies; and (b) compliance	6.3 Safeguarding Occupational Health and Safety	12-13		
B2.1	Number and rate of work-related fatalities.	6.3 Safeguarding Occupational Health and Safety	12-13		
B2.2	Lost days due to work injury.	6.3 Safeguarding Occupational Health and Safety	12-13		
B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	6.3 Safeguarding Occupational Health and Safety	12-13		
B3 Dev	elopment and Training				
B3	General Disclosure - Policies	6.4 Nurturing Talents	13		
B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Not disclosed	N/A		
B3.2	The average training hours completed per employee by gender and employee category.	Not disclosed	N/A		
B4 Lab	B4 Labour Standards				
B4	General Disclosure - Information on: (a) the policies; and (b) compliance	6.2 Advocating Integrity and Anti- corruption	12		
B4.1	Description of measures to review employment practices to avoid child and forced labour.	6.2 Advocating Integrity and Anti- corruption	12		
B4.2	Description of steps taken to eliminate such practices when discovered.	6.2 Advocating Integrity and Anti- corruption	12		



## S ESG CONTENT INDEX

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B5 Supply Chain Management						
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	B5.1	Number of suppliers by geographical region.	Not disclosed	N/A		
	B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	4.1 Managing the Supply Chain	6		
+	B6 Proc	duct Responsibility				
	B6	General Disclosure - Information on: (a) the policies; and (b) compliance	4.2 Assuring Quality of Services and Products	6		
	B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Not applicable	N/A		
	B6.2	Number of products and service related complaints received and how they are dealt with.	There were no complaints received during the Reporting Period.	N/A		
	B6.3	Description of practices relating to observing and protecting intellectual property rights.	Not applicable	N/A		
	B6.4	Description of quality assurance process and recall procedures.	4.2 Assuring Quality of Services and Products	6		
	B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	Not applicable	N/A		
	B7 Anti-Corruption					
	B7	General Disclosure - Information on: (a) the policies; and (b) compliance	6.2 Advocating Integrity and Anti- corruption	12		
	B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	6.2 Advocating Integrity and Anti- corruption	12		
	B7.2	Description of preventive measures and whistle- blowing procedures, how they are implemented and monitored.	6.2 Advocating Integrity and Anti- corruption	12		
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