

KEONG HONG HOLDINGS LIMITED



SUSTAINABILITY REPORT
2020



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CHAIRMAN AND CHIEF EXECUTIVE OFFICER'S MESSAGE

DEAR STAKEHOLDERS,

We are pleased to present our Sustainability Report for FY2020, our third since the sustainability reporting initiative was introduced. The report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards (Core option), the Singapore Exchange Securities Trading Limited (SGX-ST) Listing Rules (711A and 711B) and SGX-ST guidelines on sustainability reporting.

COVID-19 PANDEMIC – PUTTING TO TEST OUR SUSTAINABILITY INITIATIVES

If there is one thing the past year has taught governments, businesses and individuals is the fact that maintaining the ecological balance is vital for our planet's survival. While the actual cause of the corona virus has yet to be determined, environmentalists and scientists have pointed to the increasing incidence of pathogens crossing from animals to humans due to the disruption of ecosystems as human activity has often resulted in destruction of natural biodiversity. Whatever the case may be, the world is now paying the price of the Covid-19 pandemic. Our operations, as with almost every business globally, have been impacted by the pandemic, as highlighted in our Annual Report 2020. Fortunately for Keong Hong Holdings Limited ("Keong Hong" or "the Group"), we already had a robust system of safety measures and protocols in place for our operations, as workplace safety and health has always been a priority for us. While it was not an easy task, we managed to ramp these up to meet the stringent safe distancing and other workplace measures imposed by the Ministry of Health ("MOH"), Ministry of Manpower ("MOM"), the Building Construction Authority ("BCA") and other authorities, especially the Covid-Safe Restart Criteria, which mandates a safe workforce, worksite, accommodation and transportation. A safe management measures committee has been set up, with Safe Management and Safe Distancing Officers appointed to ensure strict compliance with BCA and MOM regulations, including ensuring the availability of all necessary personal protection and medical equipment.

We have taken similar measures in our operations in Maldives, to protect the health and wellbeing of our airport staff and passengers at Kooddoo Airport as well as hotel guests and staff at our two hotel properties, Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort in accordance with local Covid-19 laws and regulations. Additionally, our hotel and resort operator, Accor, has developed the Allsafe program, which is built around core pillars for the prevention of Covid-19, such as social distancing, disinfecting, personal hygiene and mandatory wearing of face masks in certain areas.

COMMITMENT TO CONTINUOUSLY IMPROVE OUR SUSTAINABILITY PRACTICES AND TARGETS

Covid-19 prevention measures aside, we have maintained our efforts at ensuring ongoing sustainable practices. Technology continues to play a vital role in improving efficiencies, minimising waste and enhancing performance. We have upgraded our digital capabilities with the aim of ultimately digitalising most of our operations. We have also enhanced our Design for Manufacturing and Assembly ("DfMA") technologies capacity with the completion of our factory extension and alterations which allows us to increase our Prefabricated Prefinished Volumetric Construction ("PPVC") and Prefabricated Bathroom Unit ("PBU") outputs.

We have met our sustainability targets for water and energy consumption, effluents and emissions production and use of recycled and green materials in our projects. Our efforts at embracing green practices have been recognised through the conferment of the BCA Green and Gracious Builder Award (Excellent) in 2020. We also continued to preserve the natural habitat and biodiversity of the environment, especially in our operations in the Maldives, where tremendous resources and effort have gone into our coral conservation programme.

CHAIRMAN AND CHIEF EXECUTIVE OFFICER'S MESSAGE

As a fair and inclusive employer and a responsible corporate citizen, our people and the community are also top-of-mind in our sustainability endeavours. We continued to provide training, re-skilling and upskilling and health and wellness initiatives for our staff and workers. We remained committed to providing opportunities for local suppliers and businesses where possible, and to supporting community and charitable initiatives particularly in the area of education.

As with previous years, our sustainability efforts would not have been possible without the collaboration of our stakeholders, especially our business partners and suppliers. With our resilient mindset, unceasing efforts and purposeful goals, 2021 will surely be brighter and better.

LEO TING PING RONALD

Chairman and Chief Executive Officer
Keong Hong Holdings Limited

KEONG HONG'S SUSTAINABILITY STORY

OUR MISSION

To be a forward-looking company with a commitment to corporate social responsibility, built on a strong foundation of transparency, governance and ethics that creates value for our stakeholders.

OUR VISION

To build a better world in an environmentally sustainable way and to improve the quality of the environment and the communities where we live and work.

SUSTAINABILITY PHILOSOPHY

The Group has established a good reputation in the building and construction and hotel management industries in Singapore and Maldives. The Group has leveraged on expansion opportunities, achieved new revenue streams and unlocked new capabilities and possibilities while at the same time keeping in mind our sustainability targets. Keong Hong has also been lauded for adopting highly innovative solutions to our construction projects to reduce wastage, increase efficiency and productivity.

Since December 2019, the outbreak of Covid has posed unprecedented challenges to the world. We faced health and safety risks arising from the pandemic this year. However, the Group remains highly vigilant to the potential impact on employees and workers and has taken effective occupational health and safety measures to protect their welfare. We have also implemented robust safety measures, such as strict safety guidelines, safety distancing, Thermal Temperature checks and wearing of masks at local projects and the Kooddoo Airport, Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort in Maldives to ensure the health and safety of our guests and employees.

In addition, the Group is committed to prevent pollution and injury in all its construction operations and to provide customers with reliable, prompt and quality service at competitive cost. We are committed to provide quality products and services to meet customer requirements through the timely delivery of projects complying with applicable legal and other requirements, quality workmanship, good safety standard and minimising impact to the environment.

Keong Hong is conscious of the impact that our projects have on the environment and shall continue monitoring and measuring these impacts. The Group will uphold our energy saving standards and invest in technologies to improve waste management and reduce emissions and effluents.

The Group will continue to ensure that our employees have a high standard of employee benefits and that there is both racial and gender diversity in our workforce to provide unique perspectives on issues that the Group faces. The Group will continue supporting charitable organisations to improve the welfare of the community.

SUSTAINABILITY TARGETS

Keong Hong strives to set a high standard of sustainable business operations in both Singapore and Maldives by investing in more new technologies, constantly seeking improvements and continuing strict compliance to our standards in daily operations.

We endeavour to provide an adequate occupational health and safety environment and continue stringent due diligence checks on our suppliers.

KEONG HONG'S SUSTAINABILITY STORY

The Group will strive to reduce our energy and water consumption, as well as our waste and effluents production. We will work towards further reducing the impact of our hotel and resort operations in Maldives on the surrounding ecosystem.

Below is a summary table of the Group's sustainability targets and performance during the reporting year.

Economic Targets for FY2021		
Segment	FY2021 Target	
Building and Construction	Productivity rate of 0.39 m ² /manday for Residential, 0.4 m ² /manday for Commercial, 0.41 m ² /manday for Institutional	
Operations and Investments in Maldives	100% of suppliers are local suppliers	
	Kooddoo Airport: 100% of workforce are local hires Mercure Maldives Kooddoo Hotel: 45% of workforce are local hires Pullman Maldives Maamutaa Resort: 45% of workforce are local hires	
Environmental Performance in FY2020		
	FY2020 Target	Performance Update
Building and Construction	Total cost of electricity, diesel consumption, generator rental and water to less than 0.8% of contract sum per project	Target met for 4 out of 5 projects: – National Skin Centre: 0.70% – Seaside Residences: 0.52% – Antares: 0.73% – Wilshire Residences: 0.77% – Sky Everton: 1.57% Sky Everton is at the early stage of construction and the cost is expected to come close to or below 0.8% at a later construction phase.
	Waste disposal cost less than 0.3% of contract sum per project	Target met for all 5 projects: – National Skin Centre: 0.07% – Seaside Residences: 0.14% – Antares: 0.18% – Wilshire Residences: 0.04% – Sky Everton: 0.23%
	Zero NEA/PUB summon for noise, silt and mosquito per project over 12 months window period of construction activities	Target met for all 5 projects
Operations and Investments in Maldives	Actively implement energy conservation practices and improve energy efficiency of operations	Energy consumption reduced by 17% at Kooddoo Airport
	Zero significant impact on water sources	There was no significant impact on water sources
Headquarter and Property Development	Actively implement energy conservation practices and improve energy efficiency of operations	Changed light fittings to LEDs and placed posters to educate staff ways to conserve energy and reduce carbon footprint.
Group-level	Zero incidents of environmental non-compliance	Achieved zero incidents of environmental non-compliance

KEONG HONG'S SUSTAINABILITY STORY

Environmental Targets for FY2021

Building and Construction	Total cost of electricity, diesel consumption, generator rental and water to less than 0.8% of contract sum per project	
	Waste disposal cost less than 0.3% of contract sum per project	
	Zero NEA/PUB summon for noise, silt and mosquito per project over 12 months window period of construction activities	
	Participate in 5 Green Mark certified projects	
Operations and Investments in Maldives	Actively implement energy conservation practices and improve energy efficiency of operations	
	Zero significant impact on water sources	
	Energy intensity Waste production Water consumption 100% of new suppliers screened using environmental criteria	
	Actively implement energy conservation practices and improve energy efficiency of operations	
Headquarter and Property Development	Actively implement energy conservation practices and improve energy efficiency of operations	
Group-level	Zero incidents of environmental non-compliance	

Social Performance in FY2020

Construction	Accident Frequency Rate below 1.3 and Accident Severity Rate below 85 per project per year	Target met for all 5 projects: Accident Frequency Rate: 0.31 Accident Severity Rate: 34.5
Group-level	Zero life loss at workplace	Achieved zero life loss at workplace
	Zero reportable occupational diseases at workplace	Achieved zero reportable occupational diseases at workplace
	Conduct at least 1 SGSecure briefing at workplace	Target met at group-level
	Zero incidents of socioeconomic non-compliance	Achieved zero incidents of socioeconomic non-compliance

Social Targets for FY2021

Operations and Investments in Maldives	Minimise transmission of Covid-19 among hotel and resort guests and employees	
	Zero incident of non-compliance with local Covid-19 safety regulations and internal guidelines	
	100% of new suppliers screened using social criteria	
Construction	Zero transmitted cases of Covid-19 among workers	
	Zero incident of non-compliance with Covid-19 safety regulations	
	Fatal Injury Rate below 2.9 and Major Injury Rate below 26.6 per project per year	
Group-level	Zero confirmed cases of Covid-19	
	Zero life loss at workplace	
	Zero reportable occupational diseases at workplace	
	Conduct at least 1 SGSecure briefing at workplace	
	Zero incidents of socioeconomic non-compliance	

KEONG HONG'S SUSTAINABILITY STORY

OUR ACHIEVEMENTS – NOTEWORTHY AWARDS

The Group, being fully committed to environmental protection, was a founding member of the Singapore Green Building Council in 2009, which leads private-public construction companies in achieving a world-class and sustainable environment in Singapore. The Council advocates green building design, practices and adoption of new technologies to drive environmental sustainability in the building and construction industry. In recognition of our achievements in environmental sustainability, the Group was awarded BCA Green And Gracious Builder Award (Excellent) in 2020. We also received the prestigious RoSPA Award in recognition of our achievements in health and safety management systems and culture.

As a testament of our commitment to service and quality, the recent achievements and awards received by the Group includes:

- BCA Green Mark Award (Platinum) for National Skin Centre (2020)
- BCA Construction Excellence Award for Parc Life Condominium (2020)
- RoSpa (Royal Society for the Prevention of Accidents) Health and Safety Silver Award (2020)
- Luxury New Hotel Award (Indian Ocean) for Pullman Maldives Maamutaa Resort (2020)
- The Edge Singapore Centurion Club (2019)
- World Luxury Hotel Award (2018) for Mercure Maldives Kooddoo Hotel
- BCA Green and Gracious (GGBS) (Excellence) (2018)
- BCA Green Mark Award (Platinum) for Raffles Hospital Extension (2017)
- Ministry of Manpower (MOM) Certificate of Merit for Safety Performance Awards
- bizSAFE Star Certificate
- ISO 9001:2015 and SS ISO 9001:2015 Certificate of Registration (Quality Management System) for design management and building construction services
- ISO 14001:2015 and SS ISO 14001:2015 Certificate of Registration (Environmental Management System)
- BCA A1 grading under the category CW01 for general building which allows us to tender for public sector construction projects of unlimited value with no restrictions for private sector construction projects.

We will continue our sustainability development efforts and improve the quality of our service, and our target is to achieve BCA Conquas Assessment rating of at least 95, achieve a 90% passing rate for joint inspections within 1 re-inspection and to complete every project on time.

We also participated in the CultureSAFE program to cultivate a progressive and prevalent Workplace Safety and Health (WSH) culture in the organisation beyond merely executing WSH practices. By actively promoting a safety awareness culture, we continue to reaffirm our management's commitment to an accident-free work culture. This ensures that every employee inherently believes in our WSH values and continues to implement and improve on WSH practices.

ORGANISATION PROFILE

Keong Hong Holdings Limited is listed on the Main Board of the Singapore Exchange Securities Trading Limited. The Group's principal activities include building construction, property and hotel investment and development. Its building construction services include a broad range of residential, commercial, institutional, industrial and infrastructural projects for both private and public sectors. The Group also has property and hotel development and investment projects in Singapore, Japan and Maldives.

The Group made its maiden foray into property development in Singapore in 2012 through a joint venture with Frasers Property (formerly known as Frasers Centrepoint Limited) to develop Twin Waterfalls Executive Condominium. Its subsequent residential developments include SkyPark Residences, The Amore, Parc Life, Seaside Residences and The Antares.

Keong Hong also ventured into hotel development and investment in 2013 with Mercure Maldives Koodoo Hotel and Pullman Maldives Maamutaa Resort in Maldives. In Singapore, the Group owns various joint hotel and mixed-use development projects – Hotel Indigo Singapore Katong, Holiday Inn Express Singapore Katong and Katong Square.

In 2016, the Group acquired the first of its two commercial properties in Japan.

Led by a qualified and experienced management team with a staff strength of over 300, Keong Hong has built a strong reputation and record of accomplishment over the last 37 years for its commitment to quality and service standards.

BUILDING AND CONSTRUCTION

Keong Hong is a provider of a broad range of building construction services to both private and public sectors for residential, commercial, institutional, industrial and infrastructural projects.

The Group's innovative technologies and technical capabilities, supported by our commitment to quality, safety, timely delivery and customer service, are our key strengths that differentiate us from our industry peers, and is the reason for our ability to secure projects from our repeat clients. The Group has pioneered several innovative technologies and processes in the construction industry that are widely used today, such as the Silent Jack-In Spun Piling System in Residential project and Intelligent Computerised Auto-Climb Peripheral Platform.

Leveraging on our technical capability and a vast array of experience gained over the years, Keong Hong has morphed into a Design and Build main contractor capable of taking on complex projects with full responsibility in design development for Structure, Mechanical & Electrical Services. For hotel and resorts development, our expertise extends to include Architectural design.

As a Design and Build main contractor, we have been able to extend our job horizon beyond that of conventional construction projects. We have established ourselves as a reputable main contractor with proven capability in the Design and Build of Condominium Projects, Hotel and Resorts Projects, Alternative Design using Top Down Construction Methodology for Complex Basement for Commercial and Institutional Projects. Our design and build and construction expertise are often harnessed through our joint ventures to create value added propositions that have won us many development projects, for example, SkyPark Residences, Amore, Parc Life, Seaside Residences, The Antares and Sky Everton.

Listed below are some completed projects involving Design and Build and their design scope:

- IBIS Hotel@ Bencoolen Street (TOP 2006, full Design and Build, include Architecture)
- Martin Place Residences Condominium (TOP 2011, Design and Build in Structure and M&E Services)
- SIM University Extension (TOP 2011, Design and Build for deep Basement near existing campus)
- Park Hotel Alexandra (TOP 2014, Design and Build in Structure and M&E Services)
- Twin Waterfalls EC (TOP 2015, Design and Build in Structure and M&E Services)

ORGANISATION PROFILE

- SkyPark Residences EC (TOP 2016, Design and Build in Structure and M&E Services)
- Amore EC (TOP 2017, Design and Build in Structure and M&E Services)
- Mercure Maldives Kooddoo Hotel (TOP 2017, Full Design and Build, include Architecture & Interior Design)
- Raffles Hospital Extension (TOP 2018, Design and Build for deep Basement near existing MRT line and an operational hospital)
- Parc Life EC (TOP 2018, Design and Build in Structure and M&E Services)
- Pullman Maldives Maamutaa Resort (TOP 2019, Full Design and Build, include Architecture & interior Design)

Listed below are the Group's on-going and recently completed building construction projects:

Project	Sector	Year of TOP	Remarks
Punggol Regional Sports Centre	Sports/ Institutional	2023 (estimated)	A joint venture Singapore Sports Council project with Hyundai Engineering & Construction Co Ltd under Hyundai-Keong Hong JV Limited Partnership. The development will consist of 5,000-seater football stadium, a swimming complex with five pools, an indoor sports hall with 20 badminton courts and a team sports hall with three convertible basketball courts. It will also include a gym, fitness studio, sheltered tennis and futsal courts, a water activity centre and an archery training centre.
Sky Everton	Residential	2023 (estimated)	A 36-storey private residential luxurious condominium project which is part of Singapore's Master Plan of a waterfront living. The highlights of this projects are 2 high-void sky gardens located at the 14th and 24th storey and a cantilevered Horizon Infinity Pool. Innovative methods have been implemented in this project, such as the use of the Ultra High Performance Concrete (UHPC) for our PBUs developed by our joint venture company K&H Innovation System Pte Ltd.
Wilshire Residences	Residential	2022 (estimated)	Another residential project with KH Land (subsidiary of Keong Hong) as the main contractor. Ultra High Performance Concrete (UHPC) for our PBUs developed by our joint venture company K&H Innovation System Pte Ltd will be installed in this project.
The Antares	Residential	2022 (estimated)	A joint venture property development project, with Keong Hong taking a 35% stake. KH Land is also the main contractor, leveraging on its Design and Build experience and capability to offer value-add for the joint venture partners. This will be the first KH Land project to use Ultra High Performance Concrete (UHPC) PBU developed by our joint venture company K&H Innovation Systems Pte Ltd.

ORGANISATION PROFILE

Project	Sector	Year of TOP	Remarks
National Skin Centre	Medical/ Healthcare	2021 (estimated)	Keong Hong's first advanced precast project using precast columns, precast beams, precast hollow core slabs and in-situ concrete topping.
Seaside Residences	Residential	2021	As the project is sited next to Victoria School, social and environmental impacts are important considerations. In addition to regulatory peripheral sound barrier, Keong Hong installed sound curtains and air coolers in classes to further mitigate environmental impact.

PROPERTY DEVELOPMENT

Keong Hong made forays into property development since 2012. Since then, the Group has developed 6 residential projects in Singapore. Our strategy to partner reputable property developers to jointly undertake residential development projects enables the Group to share resources with business partners and manage any business risks associated with property development projects.

Property	Type	Ownership
Twin Waterfalls	Executive condominium	20%
SkyPark Residences	Executive condominium	20%
The Amore	Executive condominium	15%
Parc Life	Executive condominium	20%
Seaside Residences	Private condominium	20%
The Antares	Private Condominium	35%

PROPERTY INVESTMENT

The Group's expansion into hotel and property investments provides a steady recurring income to sustain its future growth. We intend to grow our commercial and hospitality assets to form a more substantial portion of our earnings.

Keong Hong embarked on its first hotel investment in 2013. To date, our hotel and property investment portfolio includes two commercial buildings in Osaka, Japan, two hotels in Singapore, one resort and one hotel in the Maldives.

Country	Property	Ownership
Singapore	Hotel Indigo Singapore Katong	20%
	Holiday Inn Express Singapore Katong	
Maldives	Mercure Maldives Kooldoo Hotel	49%
	Pullman Maldives Maamutaa Resort	
Japan	4-4-10 Honmachi Osaka	100%
	1-2-6 Minamihorie Osaka	

ETHICS AND INTEGRITY

ANTI-CORRUPTION *(GRI 205-1, 205-2, 205-3)*

Keong Hong works diligently to ensure our employees adhere to the highest standards of ethics and integrity and comply with applicable regulations and professional codes of conduct.

Keong Hong adopts a strong stance against corruption and requires all employees to practise equal treatment, unbiased professionalism and non-discriminatory actions in relation to all business dealings. We have established clear guidelines and procedures for our employees. Our “No Gift/Cash Policy” is communicated to all our employees, vendors, subcontractors, service providers and relevant stakeholders. Keong Hong requires that no employees accept gifts, benefits and/or cash from all vendors, suppliers, subcontractors etc. Keong Hong has established a list of policies as regards gifts and entertainment. The Group does not condone our Business Associates or any parties dealing with our group to engage in the practice of giving cash, gifts and benefits to any employees of Keong Hong.

All key personnel are required to sign an Annual Declaration of Independence Form to avoid situations where conflict of interests might arise. This requirement is mandatory for all new employees as well.

There were zero confirmed incidents of corruption in FY2020.

EMPLOYEE ANTI-GAMBLING POLICY

At Keong Hong, we are committed to promoting a productive and healthy work environment for all our employees. This includes the well-being of our employees. As such, we have implemented an Employee-Gambling policy to curb gambling activities in the Group and ensure that our employees and workers have participated in Organisation Facilitated Casino Self-Exclusion. All new employees and workers will have to participate in the Casino Self-Exclusion as part of employment requirement. Our initiative for Organization-Facilitated-Casino-Self-Exclusion has received full support and participation from our company workforce, including directors and workers.

GOVERNANCE AND STATEMENT OF THE BOARD

The Board is supported by the management’s Sustainability Task Force (STF) which comprises heads of different business units and is chaired by Mr. Er Ang Hooa (Executive Director) who oversees achievement of all sustainability targets and report to the Board. The Task Force reviews the Group’s sustainability objectives and monitors the sustainability performance.



The Board considers sustainability issues as part of our strategic formulation, and approves the material environmental, social and economic topics identified. The Board also oversees that the factors identified are managed and monitored.

The Taskforce has reviewed the option for external assurance of its sustainability report. The Taskforce has assessed that external assurance is not required for this year as the Group wishes to progressively strengthen the sustainability reporting framework.

Keong Hong adopts a precautionary approach in strategic decision making and daily operations by implementing a comprehensive Enterprise Risk Management (ERM) framework which is aligned with the requirements of COSO Internal Controls Integrated Framework. An annual Group-wide risk assessment exercise is conducted to update the firm’s risk profile in the ERM framework and reflects changing business risk exposures and addresses the significant and relevant risks to the Group.

Please refer to the ‘Corporate Governance Report’ in the Annual Report for more details.

STAKEHOLDER ENGAGEMENT

We engage with all of our stakeholders through a variety of channels to update them about Keong Hong's developments and gather their feedback. We identify stakeholders as groups that have an impact, or have the potential to be impacted by our business, as well as external organisations that have expertise in topics that we consider material. The feedback we receive from our stakeholders helps us to determine our material topics and identify our focus areas as the following:

Stakeholders	Engagement Platforms	Issues of Concern	Section Reference
Employees	<ul style="list-style-type: none"> Well-structured and open annual performance appraisal system to link performance with remuneration Safety training and timely updates on Covid-19 	<ul style="list-style-type: none"> Remuneration and Benefits Training and Development Ethics and Conduct Safety measures against Covid-19 Safe accommodation for workers 	<ul style="list-style-type: none"> Our People, Our Assets Safety Measures Against Covid-19
Suppliers and Subcontractors	<ul style="list-style-type: none"> Weekly update with contractors on occurrence of accidents Mass toolbox meeting 	<ul style="list-style-type: none"> Health and Safety Environmental Compliance 	<ul style="list-style-type: none"> Managing our Suppliers
Guests	<ul style="list-style-type: none"> Safety declaration Safety briefing on Covid-19 safety measures 	<ul style="list-style-type: none"> Sustainable operations Guest health and safety Safety measures against Covid-19 for guests 	<ul style="list-style-type: none"> Safety Measures Against Covid-19 in Maldives
Customers	<ul style="list-style-type: none"> Annual Reports Corporate profile 	<ul style="list-style-type: none"> Quality of tenants' living conditions Data Privacy 	<ul style="list-style-type: none"> Protecting Customer Privacy and Data
Industrial Organisations	<ul style="list-style-type: none"> Annual Reports Conferences and Seminars 	<ul style="list-style-type: none"> Bargaining power and supply chain sustainability 	<ul style="list-style-type: none"> Financial Assistance Received from Government
Governments & Regulators	<ul style="list-style-type: none"> SGX quarterly announcements Annual Reports Sustainability Reporting Ongoing dialogues 	<ul style="list-style-type: none"> Environmental compliance with National Environmental Agency Regulatory and Industrial requirements under Building and Construction Authority and Ministry of Manpower Compliance with MOM safety measures against Covid-19 	<ul style="list-style-type: none"> Fines or Penalty Safety Measures Against Covid-19 Injuries and Incidents
Community	<ul style="list-style-type: none"> Community Services Engagement 	<ul style="list-style-type: none"> Environmental Impact Social Development Community engagement programme 	<ul style="list-style-type: none"> Giving Back to Our Community Market Presence
Shareholders and investors	<ul style="list-style-type: none"> Annual Reports Investor Relations Management 	<ul style="list-style-type: none"> Economic Performance Anti-corruption 	<ul style="list-style-type: none"> Anti-Corruption Annual Report

REPORTING PRACTICE

Keong Hong's sustainability report has been produced in accordance with the GRI Standards "Core" option covering our Group's performance from 1 October 2019 to 30 September 2020.

The GRI Standards represent global best practices for reporting on economic, environmental and social topics. The report also incorporates the primary components of report content as set out by the SGX's "Comply or Explain" requirements on sustainability reporting under Listing Rule 711B. The Group has assessed that external assurance is not required as the Group is laying the foundations for a sustainability reporting framework this year. This report supplements the Group's FY2020 Annual Report and is available online at: <https://www.keonghong.com>.

Detailed section references with GRI Standards can be found on the GRI Index Page.

Keong Hong's material topics are identified based on their impact on our internal and external stakeholders, as outlined in the Stakeholder Engagement Section. (● = Singapore, ● = Maldives)

Our property investments in Japan are office rentals and not significant. As such, we did not include operations in Japan in this report.

Material Topics	Applicable Segments			
	Building and Construction	Operations and Investments in Maldives	Headquarter and Property Development	Group-Level
ECONOMIC				
Economic Performance	●			
Market Presence		●		
Indirect Economic Impacts	●	●		
Procurement Practices		●		
Anti-corruption				● ●
ENVIRONMENTAL				
Materials	●			
Energy	●	●	●	
Water	●	●		
Biodiversity		●		
Emission	●	●	●	
Effluents and Waste	●	●		
Environmental Compliance	●	●		
Supplier Environment Assessment	●	●		

REPORTING PRACTICE

Material Topics	Applicable Segments			
	Building and Construction	Operations and Investments in Maldives	Headquarter and Property Development	Group-Level
SOCIAL				
Employment				● ●
Occupational Health and Safety				● ●
Training and Education				● ●
Diversity and Equal Opportunity				● ●
Non-discrimination				● ●
Child Labour		●		
Forced or Compulsory labour		●		
Local Communities				● ●
Supplier Social Assessment	●	●		
Customer Health and Safety		●		
Customer Privacy		●		
Socioeconomic compliance				● ●

BUILDING AND CONSTRUCTION

DEVELOPING TECHNOLOGY

GRI 203-1, 203-2

Our construction projects have brought about indirect economic benefits to the local community. Our construction projects require the expertise of direct/indirect suppliers and specialists – concrete, reinforcement, tiles/stone and furniture which generates business opportunities within and among the supply chain.

We have upgraded our digital capability in Building Information Modelling (BIM), Virtual Design and Construction (VDC) and Virtual Reality (VR). We are proud to be one of the pioneers in adopting the Digit-alpha capability transformation Programme, a pilot project with VR as a core module sponsored by Info-communications Media Development Authority (IMDA). With the Digit-alpha Programme, we hope to streamline our operations and transform our business processes to improve our workforce productivity and achieve business growth.

We have also adopted Design for Manufacturing and Assembly (DfMA) technologies, including Prefabricated Prefinished Volumetric Construction (PPVC), Prefabricated Bathroom Unit (PBU) and Mechanical Electrical Plumbing (MEP) module which improve productivity at construction sites, as the manufacturing of these building components can be completed off-site in a safe and controlled environment. Notably, DFMA was used extensively in the National Skin Centre project, such as integrating horizontal MEP module at the passenger lift lobby, vertical MEP module at the air handling unit (AHU), as well as inter-connecting piping and combined services MEP in the risers.



DfMA – Pre-connection between Mechanical, electrical and plumbing service modules

BUILDING AND CONSTRUCTION

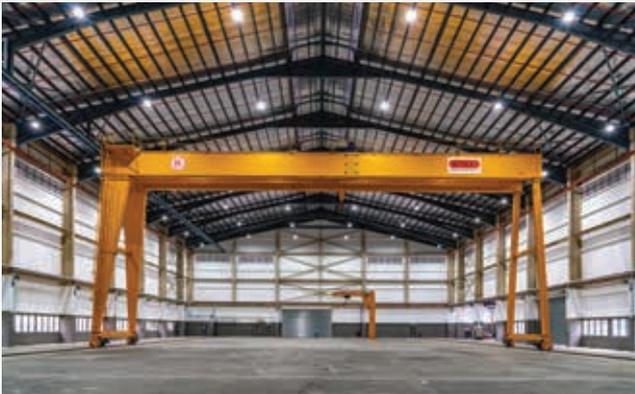
K&H Innovative Systems Pte Ltd, a joint venture between Keong Hong Construction Pte Ltd and Ho Lee Construction Pte Ltd, has obtained the Certificate of Accreditation from Singapore Concrete Institute for its Light Weight Concrete PBU systems. We have started production of PBUs for our ongoing projects at factory space at our Headquarter. The factory space at our Headquarter has capacity to produce 1,700 PBUs in a year, currently the factory space is producing PBUs for The Antares project.



PBU fitting out facility at 9 Sungei Kadut Street 2

BUILDING AND CONSTRUCTION

Our new factory at 20 Chin Bee Drive that underwent major Additions and Alterations (A&A) works is equipped with a 45-ton double gantry crane with 14-meter clear lifting height and a 5-ton Jib Crane. It has enough capacity to produce PPVC for 10 dwelling units in 14 days or 130 PBUs in 10 days which works out to be 500 dwelling units of PPVC or 4,680 PBUs in a year. The adoption of PPVC and PBU will help to significantly reduce our reliance on labour, speed up construction and minimize dust and noise pollution in our construction projects as more activities are done off-site.



PPVC fitting out facility at 20 Chin Bee Drive

In addition, high productivity software based on mobile and cloud technology have been used to enhance productivity on-site. For example, we used Novade Quality in the Seaside Residence project to manage the defect rectification process during quality inspections, handover and defect liability period for building projects. More of such high productivity software shall be utilised for our ongoing and future projects.

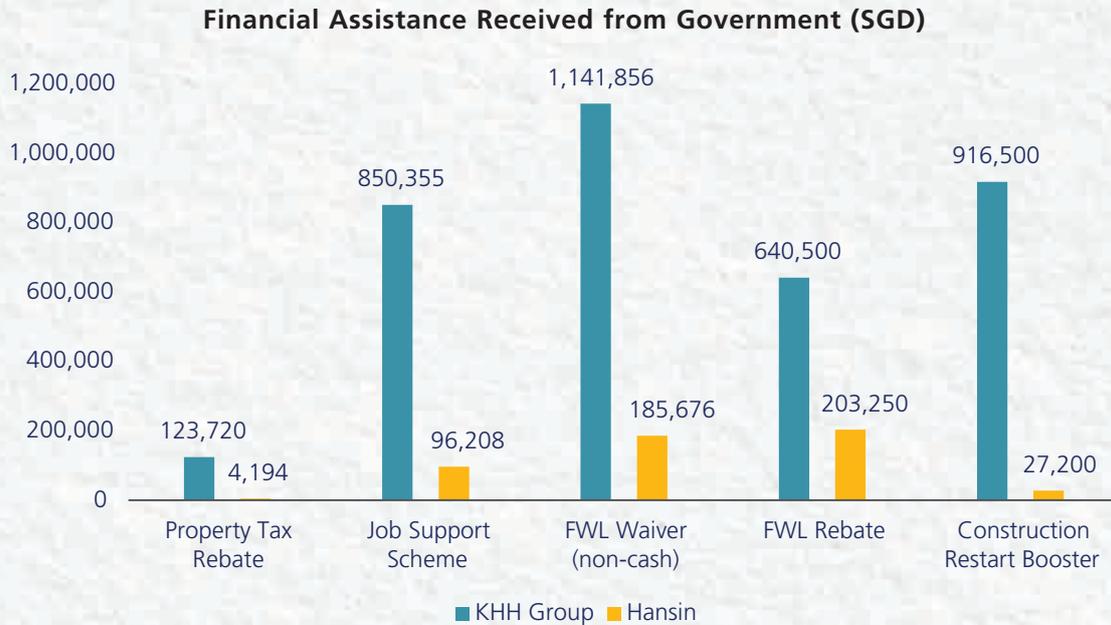
BIM 360 is another cloud-based software adopted by our company to connect project teams and data in real-time, flowing from design to construction. This technology supports informed decision-making and leads to more efficient and effective work processes.

Keong Hong will continue to innovate and implement new technologies in our operations to benefit our business, our industry and the community.

BUILDING AND CONSTRUCTION

FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT

GRI 201-4



In FY2020, the Group received \$4,189,459 government grant in total from five sources, namely Property Tax Rebate, Job Support Scheme, Foreign Worker Levy (FWL) Waiver (non-cash), FWL Rebate and Construction Restart Booster. These grants have been utilised as Covid-19 relief funds to implement safe management measures, such as building temporary living quarters (TLQ), construction temporary quarters (CTQ) and arrangement of foreign workers’ dormitory shifting. In addition, the funds are used for salary/wages, meals, transport, medical check-up, surviving working capital and site expenses during the Circuit Breaker and to mitigate the adverse impact of the lockdown on revenue generation.

RECYCLED INPUT MATERIALS

GRI 301-2

The Group has undertaken methods to recycle input materials in our projects to reduce wastage and ensure sustainable operations.

At Keong Hong, we are committed to using eco-friendly and recycled materials in our construction projects wherever possible. We conscientiously use green concrete to replace Ordinary Portland Cement for the construction of permanent structures in our Amore and Seaside Residences projects, and 10% of the green concrete is used for superstructure works. Together with our use of green material, this translates into reduction in carbon footprint for the construction projects as the materials can be recycled. Notably, our Raffles Hospital extension project received a Green Mark Platinum rating, which is a testament to our corporate commitment to green practices.

In addition, to minimise wastage, we implement predominantly aluminium system formwork which includes self-climbing formwork, vertical safety screen, table form, metal wall and slab formwork for all construction projects on-site, as aluminium can be reused with minimal wastage. We also use recycled construction materials like recycled timber and plywood for safety barricade, recycled steel hollow section for fabrication and recycled earth control measure tank and filtration systems to control water discharge drainage for temporary works.

We used green materials extensively in the National Skin Centre, with the concrete used comprising 36% green concrete and 0.04% green cement. National Skin Centre has received a Green Mark Platinum rating.

BUILDING AND CONSTRUCTION

ENERGY AND EMISSIONS MANAGEMENT

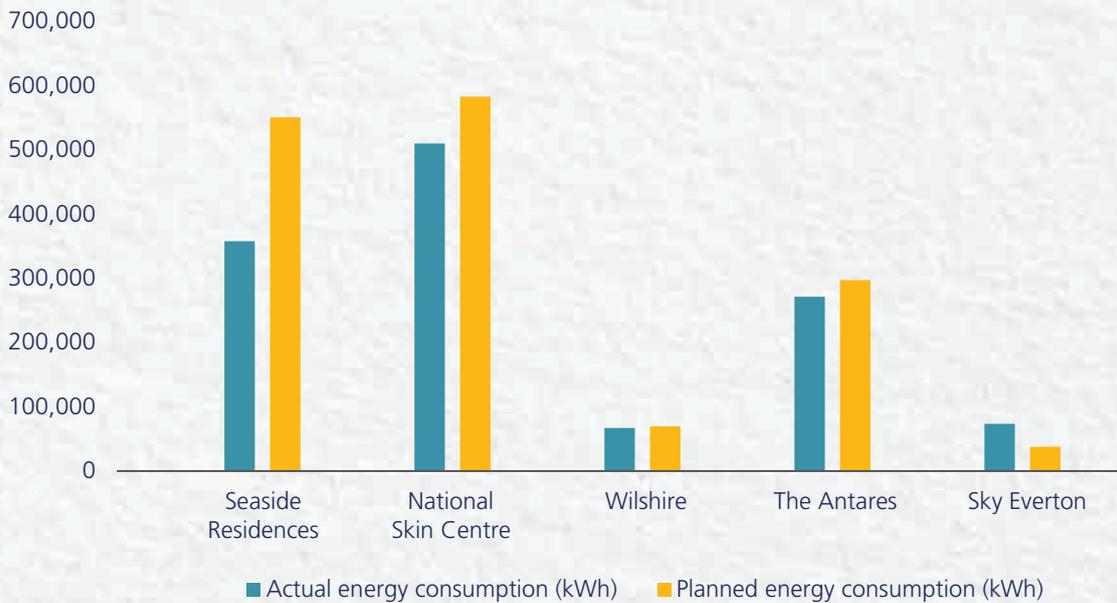
GRI 302-1, 302-4, 302-5, 305-2, 305-5

Keong Hong is committed to the preservation of the environment by championing Green and Gracious practices to reduce energy and water consumption as well as carbon dioxide emissions. We have received the Green and Gracious Excellence Award from BCA in recognition of our efforts.

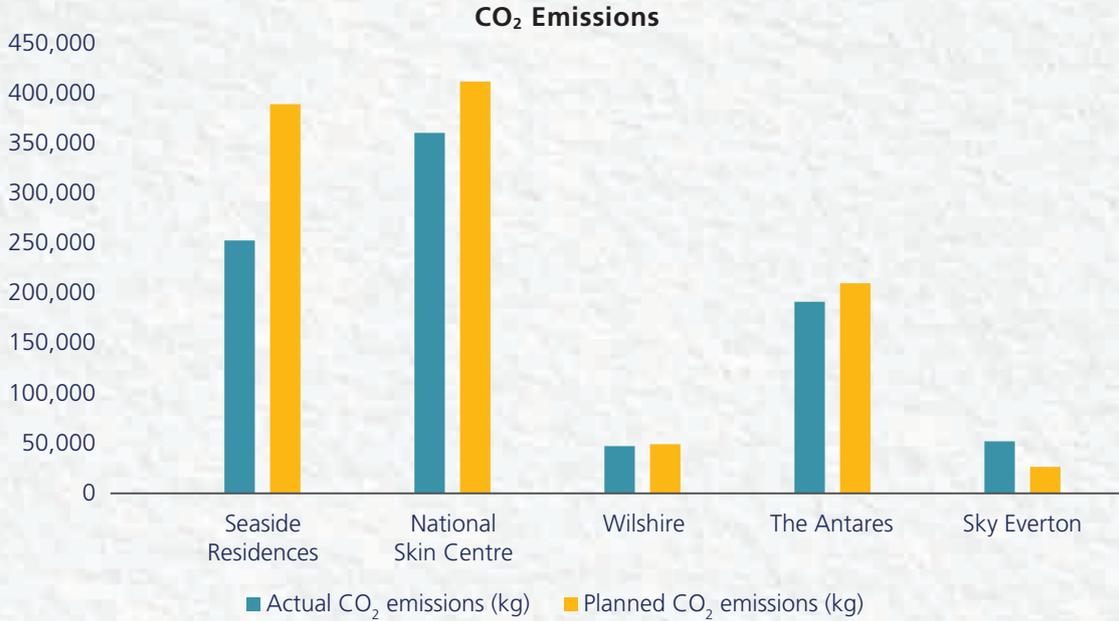
The Group endeavours to draw energy from renewable sources rather than non-renewable sources. This is to preserve the environment and meet compliance standards. The Group taps on solar energy to power noise meters and traffic warning signs. In addition, the Group uses green label appliances and energy efficient light fittings to reduce energy consumption and emissions.

The Group is committed to achieving our planned objectives and targets to ensure that we are operating sustainably. We strive to reduce energy consumption for all building and construction projects. See below for charts for energy consumption for ongoing projects:

Energy Consumption



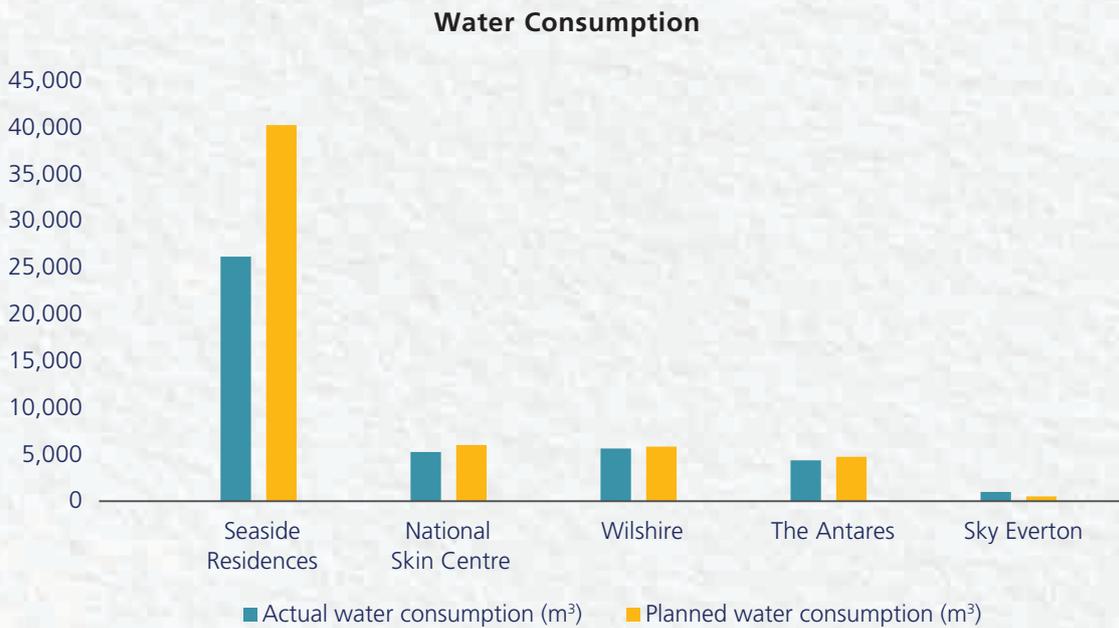
BUILDING AND CONSTRUCTION



WATER MANAGEMENT

GRI 303-1, 303-2, 303-3

At Keong Hong, we are committed to reducing water consumption at construction sites to ensure sustainable operations. As seen from the graph below, our water consumption is generally lower than planned, which is testimonial of our water conservation efforts. As the Sky Everton project is still at the early stage of construction, the actual water consumption is higher than planned. We expect the water consumption to come close to or below the planned water consumption at a later construction phase.



BUILDING AND CONSTRUCTION

We engage Qualified Erosion Control Professional (QECP) to design our Earth Control Measures (ECM) filtration and sediment control system such that part of the effluents discharge is reused for wash bay. This is an efficient way to conserve water as washing large volume of vehicles could mean high water consumption. Rainwater that is stored in the sump of the tank is also reused for the washing of vehicles entering or leaving the site. This allows us to conserve water used for washing of vehicles at our construction sites. We endeavour to implement more water conservation measures to further reduce water consumption on-site.

EFFLUENTS AND WASTE MANAGEMENT

GRI 306-1, 306-2, 306-5

Keong Hong endeavours to manage waste sustainably by implementing technologies and complying with the code of practice.

We minimise construction waste by harnessing advanced technology, including BIM, VDC and VR. These technologies pre-empt costly abortive works by first identifying clashes in a virtual environment before the project is actually built. High standard of workmanship and quality of works are also achieved through implementation of DfMA technology like PPVC and PBU by shifting work to a sheltered and controlled environment. Wherever feasible, construction materials used for our projects are Green Label certified from the Singapore Environmental Council. The Group implements on-site recycling policies to segregate different types of waste materials so they can be efficiently handled for disposal. Surface run-off water is treated before it is discharged to public drains.

Keong Hong is responsible in the disposal of its waste materials by using only approved methods to minimise any harm to the environment. Excess debris and general waste from construction are collected in designated bins for proper disposal by licensed disposal contractors. All left over scrap metal from reinforcement bar are segregated and disposed by licensed waste collectors. Timbers that are not reusable are periodically disposed of by a licensed contractor engaged by our appointed Environment Control Officer.

Waste Production



BUILDING AND CONSTRUCTION

NOISE AND VECTOR MANAGEMENT

GRI 413-1

The Group strives to manage noise arising from construction activities by using a set of permissible noise limits and Noise Management Plans (NMP) compliant with National Environment Agency (NEA) Noise Regulation. To achieve minimization of noise, the Group has engaged a noise control vendor to perform real time noise monitoring to ensure that the noise generated does not exceed the NEA permissible noise levels. Noise barriers are erected around the site to reduce noise from the construction equipment. Generators used on site are required to be 'silent' generators, so that noise generated is reduced.

The Group implements vector control plans at our sites to combat the issue of pest and mosquito breeding. Daily on-site housekeeping checks are conducted to control and pre-empt mosquito breeding. To further mitigate mosquito breeding, the Group engages pest control companies to manage our construction sites to clamp down on mosquito breeding. Allocation and implementation of proper disposal systems for construction debris and organic waste are in place to facilitate pest control.

MANAGING OUR SUPPLIERS

GRI 308-1, 308-2, 414-1, 414-2

At Keong Hong, we take pride in our efforts to ensure that our suppliers and subcontractors are selected based on high quality and environmentally friendly practices. Before awarding contracts, we evaluate our suppliers and subcontractors based on their track record, workmanship, ISO certifications, safety performance as well as Green and Gracious practices. We select those with satisfactory scores, and for some who are relatively new and failed the supplier assessment, we will monitor their site performance to ensure accountability and quality assurance.

During contract term, we continue to assess suppliers based on their compliance with material specification/standards, response to replacement of defective material/emergency and their Green and Gracious practices. As for subcontractors, we assess their technical capability, safe performance and Green and Gracious practices. These continuous assessments show our commitment to maintain quality and sustainability of our operations.

In addition, we also assess subcontractors and external service providers who procure materials and services for our contracts and project activities. We execute purchase control to ensure that they meet the needs of our project requirements during procurement. We go the extra mile in supplier management to ensure quality, accountability and sustainability in our supply chain.

We exercise stringent control at site level via biometric system to ensure that only valid work permit holders can gain entry to the project site. Regular checks are conducted by our HR executive to ensure that only workers with current worksite resident address are allowed to stay on-site. We mandate that our contractors and sub-constructors comply with labour regulations in Singapore.

ENVIRONMENTAL COMPLIANCE

GRI 307-1

The Group's compliance polices and regulations take into consideration data collected on Energy, Water, and Waste Disposal. This data is analysed for the various projects for project cost optimisation and resources.

Keong Hong has committed to a set of guidelines to manage environmental pollution at all our project sites. We are committed to controlling the combined cost of water, electricity, diesel consumption and generator rental to less than 0.8% of contract sum per project, as well as keeping waste disposal cost to less than 0.3% of contract sum per project.

There were zero incidents of non-compliance with environmental laws and regulations in FY2020.

OPERATIONS AND INVESTMENTS IN MALDIVES

SAFETY MEASURES AGAINST COVID-19 IN MALDIVES

GRI 416-1, 416-2

KOODDOO AIRPORT

The Group is committed to safeguard our employees and passengers at the Kooddoo Airport from the risk of contracting Covid-19. In order to ensure their safety, adequate Covid-19 safety measures have been implemented that are in accordance with local Covid-19 laws and regulations. The airport Management has conducted a comprehensive safety risk assessment to ensure that proper mitigation and preventive measures are in place.

The key safety measures implemented are as follows:

- Face masks, gloves and personal protective equipment (PPE) (if required) shall be worn strictly at all times;
- Frequent handwashing and minimum safety distancing of 1m between individuals;
- Common contact points are frequently cleaned and disinfected;
- Access to airport terminals will be limited to passengers, crew members and staff on duty;
- Staff and passengers accessing the Airport Terminal Building will be subject to no-touch Thermal Temperature checks; and
- Designated isolation rooms to quarantine suspect Covid-19 cases.

In FY2020, there were 0 cases of Covid-19 infection among our Kooddoo airport staff and there was no incident of non-compliance with local Covid-19 safety laws and regulations.

MERCURE MALDIVES KOODDOO HOTEL AND PULLMAN MALDIVES MAAMUTAA RESORT

The hotel and resort operator, Accor, has developed the Allsafe program that safeguards both guests and staff safety. All hotels and resorts are required to localise the Allsafe program and implement local SOPs around the 16 core pillars. The core pillars include social distancing, disinfecting, hand washing, mandatory wearing of face masks for all staff in guest areas, as well as maximum guest number in outlets and on buggies. The hotel and resort act in strict compliance with the local Covid-19 laws and regulations and the Allsafe guidelines.

Furthermore, an independent Audit for Allsafe compliance has been performed at the Kooddoo Hotel on 21 October 2020 and at the Maamutaa Resort on 19 October 2020 to ensure that the Allsafe guidelines have been implemented strictly.

In FY2020, there were 0 cases of Covid-19 infection among our hotel and resort staff and there was no incident of non-compliance with local Covid-19 safety laws and regulations as well as Allsafe guidelines.

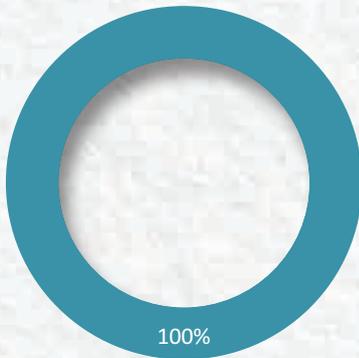
OPERATIONS AND INVESTMENTS IN MALDIVES

MARKET PRESENCE

GRI 202-2

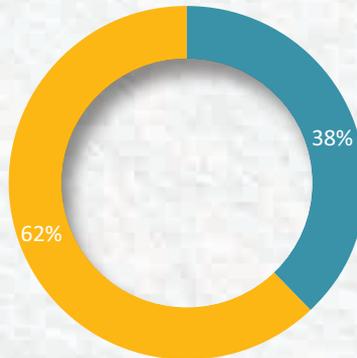
Keong Hong strives to empower the local community through increasing employment opportunities for airport, resort and hotel operations in Maldives. 100% of the staff at the Kooddoo Airport are hired from the local community, including all senior management staff. For our Maldives operations, the proportion of employees hired from the local community are as below:

Proportion of employees hired from local community for Kooddoo Airport



■ Local community

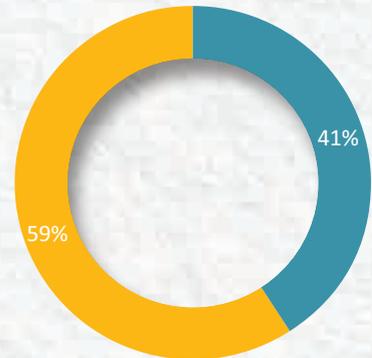
Proportion of employees hired from local community for Mercure Maldives Kooddoo Resort



■ Local community

■ Others

Proportion of employees hired from local community for Pullman Maldives Maamutaa Resort



■ Local community

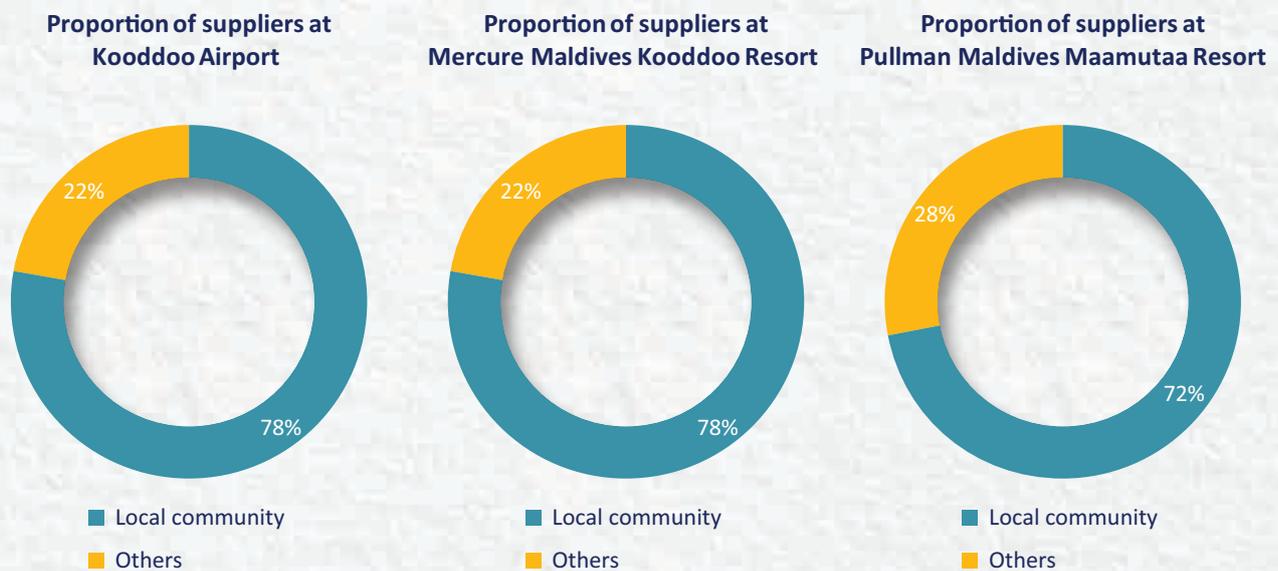
■ Others

OPERATIONS AND INVESTMENTS IN MALDIVES

DEVELOPING TECHNOLOGY & INDIRECT ECONOMIC IMPACTS

GRI 203-1, 203-2, 204-1

Keong Hong has implemented various practices to ensure that we benefit the local economy and businesses during our operations. We endeavour to create more business opportunities for local suppliers. As such, we make a conscientious effort to procure from local suppliers directly, such as consumables, fire-fighting and medical equipment. In FY2020, the proportion of local suppliers engaged are as below:



In addition, with our Kooddoo Airport expansion, the airport can accommodate more planes including private jets. Locals also have more convenient means of transport, and tourists can travel to resorts near Kooddoo via transit at the airport. This will help to promote the local tourism industry development and create more jobs for the locals. To date, 196 Maldivians are hired for the resorts and airport operations, and we intend to continue improving airport facilities to meet future demand.

ENERGY AND EMISSIONS MANAGEMENT

GRI 302-1, 302-3, 302-4, 305-2, 305-4, 305-5

The Group closely monitors operations in Maldives to ensure effective implementation of energy conservation measures. Some examples include using LED lights instead of incandescent bulbs to conserve energy and creating staff awareness by placing signage to sensitise employees to inherently enforce environmentally friendly practices.

Kooddoo Airport

In FY2020, total energy consumption was 287,255 kWh and total CO₂ emissions were 100 kg at Kooddoo Airport. The energy consumption in FY2020 reduced by 17% from FY2019.

Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort

We endeavour to conserve energy consumption whenever possible, and we have plans to install false ceilings or glass partitions and monitor sensors in public toilets, fitness centre and other areas of the Resort and Hotel to conserve energy.

OPERATIONS AND INVESTMENTS IN MALDIVES

We have installed and started operating the solar energy system at Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort. Solar Panels are installed on the roof of Back of House (BOH) buildings. The estimated capacity of the solar system installed is 900 kWp, of which 240 kWp is designated for Mercure Maldives Kooddoo Hotel and 660 kWp for Pullman Maldives Maamutaa Resort. With this system in place, the amount of diesel required to power the Resort has greatly reduced.



Solar panels installed at the Pullman Maldives Maamutaa Resort

Pullman Maldives Maamutaa Resort

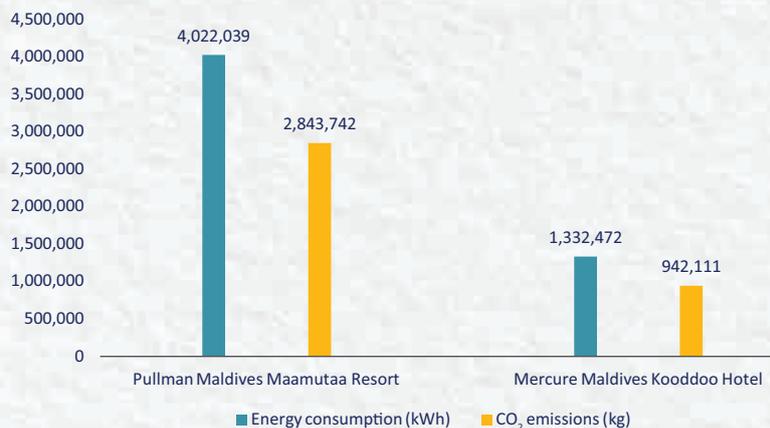
- Complete mechanical, electrical and plumbing system controlled and monitored via Building Management System (BMS) - regulate energy consumption
- Programmable dimming and switching system at all Front of House buildings - control energy consumption
- Control outdoor pathway lightings via daylight sensors and BMS - reduce energy consumption
- 4 prime powered generators with an auto synchronising and auto load sharing sytem to generate energy – monitor energy usage and shut down some generators during low energy demand periods to save on energy consumption
- Step-up and step-down substations to distribute power to each building - increase efficiency of power consumption

Mercure Maldives Kooddoo Hotel

- LED lights and solar panels installed – reduce energy usage and emissions during operations
- 3 generators with alternators - increase efficiency of power consumption

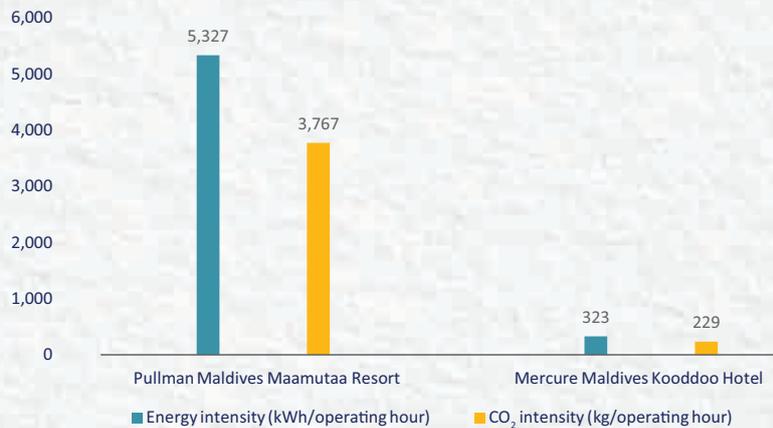
In FY2020, the energy consumption and intensity at the Maamutaa Resort and Kooddoo Hotel as follows:

Energy Consumption and CO₂ Emissions



OPERATIONS AND INVESTMENTS IN MALDIVES

Energy and CO₂ Intensity



The CO₂ emissions and intensity as follows:

Building	CO ₂ emissions (kg)	CO ₂ intensity (kg/operating hour)
Pullman Maldives Maamutaa Resort	2,843,742	3,767
Mercure Maldives Kooddoo Hotel	942,111	229

Both resorts operated from January to March 2020 and closed from 1 April due to the Covid-19 pandemic. Mercure Maldives Kooddoo Hotel reopened from 1 August 2020, while Pullman Maldives Maamutaa Resort reopened from 1 October 2020.

WATER MANAGEMENT

GRI 303-1, 303-2, 303-3

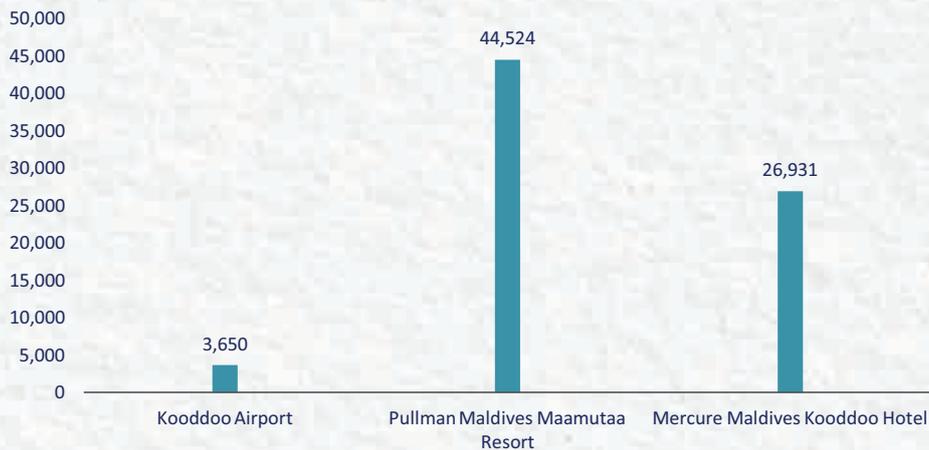
We recycle water via desalination methods through Reverse Osmosis (RO).

Mercure Maldives Kooddoo Hotel	Pullman Maldives Maamutaa Resort	Kooddoo Airport
<ul style="list-style-type: none"> • 2 RO fresh water machines to produce fresh water • 2 treated water tanks of 150,000 litres each and 1 sewerage treated water tank of 150,000 litres to store the treated water 	<ul style="list-style-type: none"> • 2 RO fresh water machines to produce fresh water • 5 treated water tanks of 150,000 litres each and 1 sewerage treated water tank of 150,000 litres to store the treated water 	<ul style="list-style-type: none"> • Monitor RO plant operations and water consumption on a regular basis – ensure efficient water conservation

OPERATIONS AND INVESTMENTS IN MALDIVES

The Group will continue to preserve all water sources and minimise any adverse impact caused by water withdrawal by constructing more desalination plants in the near future to achieve self-sufficiency for water demands on the islands.

Actual Water Consumption (m³)



In FY2020, there was no significant impact on any water sources.

EFFLUENTS AND WASTE MANAGEMENT

GRI 306-1, 306-2, 306-5

To ensure proper management of sludge and effluents, the Group has constructed a sewer network grid over the island with a gravity flow system, as opposed to the conventional pump system used in previous projects which was less energy-efficient.

Division of waste type generated at our Kooddoo Airport, Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort are completed at the waste management building which is equipped with incinerators, compactors and bottle crushers. We ensure that proper transportation and waste disposal methods are used in accordance to the type of waste.

Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort

At Mercure Maldives Kooddoo Hotel, sewage is disposed via a computerised chemical digestive system whereby sewage is pumped via a 150,000 litre capacity sewage treatment plant to process it into sludge. On the other hand, sewage at Pullman Maldives Maamutaa Resort is disposed via Membrane Bioreactor system whereby sewage is pumped via a 300,000 litre capacity sewage treatment plant to process it into sludge. Once the sludge is dried, it is sent to a nearby waste management centre and used for landfill. This system is established for both Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort, and complies with local standards and accepted code of practices.

We take care in wastewater disposal to ensure that we do not harm the environment during operations. At our properties, rejected brine from our RO plants are instantly mixed with the water column to reduce its concentration to negligible amounts before being discharged into the lagoon, thus this discharge has no effect on the surrounding environment. Sewerage is also recycled into portable water to be stored for irrigation usage, and only excess sewerage is discharged into the sea.

OPERATIONS AND INVESTMENTS IN MALDIVES

In FY2020, the waste production at Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort are as below:



Bottling room, bottle washer, pre-bottle washing, filters (left to right)



Bottling tap, water-filled bottles, glass bottles used in Mercure Maldives Kooddoo hotel and rooms (left to right)

In our effort to minimise plastic wastage, we own water bottling facilities at both Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort which effectively cleans glass bottles and fills the bottles up with clean filtered potable water. These glass bottles of water have replaced plastic bottles in the rooms, thereby reducing plastic waste generated.

OPERATIONS AND INVESTMENTS IN MALDIVES



Organic waste composting machine at Pullman Maldives Maamutaa Resort

Both Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort are equipped with its own organic waste composting machine that processes daily food waste ingredients into organic fertilisers. By applying only organic compost, it improves the overall soil structure.

We have also reached out to local residents and companies to recycle used cooking and generator oil. Our organisation is consistently looking for new options to help improve environmental sustainability.

Kooddoo Airport

In FY2020, the average daily waste generation at Kooddoo Airport was 150 kg, which remains at the same level compared to last year.

MANAGING BIODIVERSITY

GRI 304-2, 304-3

Keong Hong endeavours to protect and preserve the environment during our operations, by putting initiatives in place to ensure we operate sustainably.

The Group has engaged specialists to preserve the vibrant biodiversity of the environment in Maldives. Before excavation and construction commence, our specialists will transplant corals from all project sites to safe areas. The Group has plans to set up a coral conservation programme at the resort which includes a coral garden and coral nursery to preserve the coral reef. We endeavour to maintain the good condition of the coral colonies in the vicinity of our operations. Planting of corals under the rooms will only commence after all construction activities are completed to prevent any unnecessary coral stress and bleaching.

OPERATIONS AND INVESTMENTS IN MALDIVES



Coral nursery

Due to the high volume of marine recreation activities at Pullman Maldives Maamutaa Resort, the Group has undertaken several initiatives to manage environmental impacts for all operations in Maldives. To circumvent any damage to the coral reef through the use of boats and marine equipment, the Group has imposed rules on boat operators on the island such as anchoring, boat operation, boat sewage and garbage disposal. For tourists engaging in recreational activities, strict rules on activities such as fishing, marine wildlife viewing, snorkelling, diving and scuba, have been established and enforced.

In an effort to ensure that our environmental protection efforts are regulated and implemented properly, we went the extra mile to perform Environmental Impact Assessment (EIA) on the Pullman Maldives Maamutaa Resort project, and we successfully attained EIA approval in 2015. The EIA addendum was submitted and approved prior to the commencement of coral gardening works and revision of Concept Masterplan for both Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort. As such, proper precautionary measures have been implemented to guarantee environmental and biodiversity sustainability during operations.

In FY2020, we transplanted corals from our coral nursery to the Ocean Water Villa and Underwater villa to showcase our coral nursery to the guests from the comfort of their rooms. Marine life, including lionfish, octopus and boxfish were added for biodiversity.

OPERATIONS AND INVESTMENTS IN MALDIVES



Installed customised viewing panels and planted corals on concrete bases with fishes for guest viewing

Our Island Marine Biologist regularly assesses the condition and growth of the coral colonies under the Ocean Villa's viewing panel and the coral garden, and coral predators are removed once spotted. The coral garden in front of the two Ocean Villas were observed to be under stress due to the rising temperature at the beginning of 2020. In the recent survey conducted in July 2020, the coral garden was found to be recovering beyond expectations and growing at an unprecedented pace, and the overall quantity of fishes has also increased. The recovery is mostly due to the monsoon rain and wind that lowered the water temperature by 1-2 degree Celsius.

OPERATIONS AND INVESTMENTS IN MALDIVES



Coral garden in front of the Ocean Villas

We also initiated a small scale sponge garden experiment on the northern side of the Ocean Villas to explore its growth conditions and ideal technique, collect feedbacks from different species and identify the ideal candidates for a potential larger project.

OPERATIONS AND INVESTMENTS IN MALDIVES



Phat Chameleon Garden

In addition to coral nurseries, we built an organic farm at both properties to minimise negative impacts on the surrounding environment. Our organic farm at Pullman Maldives Maamutaa Resort, Phat Chameleon Garden, measures at an estimated area of 900 sqm and it is loaded with exotic and delicious variety of tropical fruits and vegetables. The farm offers many fruits trees like *Persea Americana* (Avocado), *Manikara zapota* (Chiku), *Averrhoa carambola* (Star Fruit) and *Annona muricata* (Soursop). Organic farming is an agricultural system that adopts ecologically based pest controls and biological fertilisers derived mainly from animal and plant wastes. It reduces negative environmental impacts caused by the use of chemical pesticides and synthetic fertilisers in conventional agriculture, and it has numerous ecological benefits.

OPERATIONS AND INVESTMENTS IN MALDIVES



Natural Lake at Pullman Maldives Maamutaa Resort

The Pullman Maldives Maamutaa Resort has a Natural Lake that has an estimated area of 4,000 sqm. It is surrounded with well-preserved thick and dense vegetation and is the key feature of the island. In addition, the Pullman Maldives Maamutaa Resort is equipped with a SolarBee water purifier system that treats the lake water. The water purifier operates on solar power and has a large area of influence over the lakes and source of raw water.

Sludge is produced and collected from the surface of the natural lake. This sludge is then compiled and dried to become bio solid compost which will then be used as fertiliser for landscaping.



Compile of sludge to become compost

OPERATIONS AND INVESTMENTS IN MALDIVES

MANAGING OUR SUPPLIERS

GRI 308-1, 308-2, 408-1, 409-1, 414-1, 414-2

Mercure Maldives Kooddoo Hotel and Pullman Maldives Maamutaa Resort

When selecting suppliers, we entrust the recommendations from our internationally renowned hotel operator, AccorHotel (Accor), with their abundance of experience in the Maldives region. We evaluate and select suppliers that are approved and recommended by our hotel operator.

The suppliers have gone through stringent checks to ensure that they are in compliance with local regulations and sourcing of raw materials are done ethically and in an environmentally friendly manner. We also regularly review the supplies procured to ensure that sustainable products are used. For instance, at Pullman Maldives Maamutaa Resort, the procured bed sheets, duvet and pillow covers are eco-friendly textile products certified according to Oeko-Tex Standard 100 technology. The Oeko-Tex Standard 100 is a globally uniform testing and certification system for textile products which covers multiple human-ecological attributes, and textile products may be certified according to Oeko-Tex Standard 100 only if all components strictly meet the required ecological criteria without exception. This shows our commitment to ensure a sustainable supply chain.

We have plans to start screening suppliers ourselves instead of through our hotel operator for future jobs to ensure quality, accountability and social responsibility within our supply chain.

In addition, Accor ensures strict compliance with the local legal framework, as well as various fundamental documents including International Labour Organisation's fundamental conventions and the ten principles of the United Nations Global Compact. As such, Accor exercises strict due diligence when assessing their suppliers and service providers to ensure they are not at risk for incidents of child labour or forced or compulsory labour. In the event of non-compliance with local labour laws, Accor would immediately sever all ties with the supplier or service provider in question.

We entrust Accor with the hotel supplier management as they have expertise in that area. Majority of our suppliers are approved and recommended by our hotel operator. The suppliers have gone through stringent checks to ensure there is no child or prisoner labour. We have plans to start screening suppliers ourselves for future jobs to ensure quality and accountability.

Kooddoo Airport

To ensure compliance with Maldives labour regulations, our HQ key personnel regularly visit the Kooddoo Airport site to conduct operational audit with the assistance of our local legal advisor.

ENVIRONMENTAL COMPLIANCE

GRI 307-1

There were zero incidents of non-compliance with local environmental laws and regulations in FY2020.

PROTECTING CUSTOMER PRIVACY AND DATA

GRI 418-1

The Group takes utmost care in protecting our customers' privacy and data and is in compliance with the Personal Data Protection Act (2012). There were no reported breaches in FY2020.

HEADQUARTER AND PROPERTY DEVELOPMENT

ENERGY AND EMISSIONS MANAGEMENT

GRI 302-4, 305-5

The Group adopts energy-efficient features such as occupancy sensors for toilets, LED lights at corridors and green label products for photocopier machines to conserve daily energy usage. Energy efficient structures, such as energy-efficient refrigerator and air-conditioning system, lift system with VVVF (Variable Voltage Variable Frequency) and sleep mode features, and ductless fans in the basement are installed to reduce energy consumption. We also use power grid power instead of a diesel generator to reduce emissions and save energy.

OCCUPATIONAL HEALTH AND SAFETY

SAFETY MEASURES AGAINST COVID-19

GRI 403-1, 403-2, 403-3, 403-4

In FY2020, the Covid-19 outbreak resulted in a global pandemic which posed as a serious threat to our staff and workers. During these unsettling times, we stay committed to prioritising their safety and providing them with a safe working environment. We have set up a safe management measures (SMM) committee which includes Safe Management Officers (SMO) and Safe Distancing Officers (SDO) to ensure that we strictly comply with the Ministry of Manpower (MOM) regulations regarding Covid-19. The SMO and SDO will monitor the health conditions of all staff and workers on a daily basis and ensure that PPE and medical equipment (e.g. thermometers, disposable gloves, surgical masks and hand sanitisers) are adequately prepared.



Implementation of safe management measures at worksites

OCCUPATIONAL HEALTH AND SAFETY



Implementation of safe management measures at worksites

With the current Covid-19 pandemic, we have conducted a comprehensive safety risk assessment and briefed all employees on the SMM to ensure strict enforcement. Targeting the risk areas, we have implemented SMM which meet the Covid-Safe Restart Criteria under BCA, namely to ensure a safe workforce, safe worksite and safe accommodation and transportation. Some of the SMM include safety distancing, biweekly testing of workers for Covid-19, segregation of workers of different projects to minimise transmission risks, segregation of dormitories into zones to enforce segregation of workforce on site, biometric scanning and temperature monitoring using temperature screening face recognition systems. In addition, the SMO and SDO will assist and supervise workers to ensure that all workers comply with safety distancing measures and any other preventive actions advised by the Authorities. We keep abreast with the latest health advisories issued by BCA, Ministry of Health (MOH), MOM and other government agencies as the situation evolves and take precautions to protect our staff, workers and visitors. We have evacuation procedures in place to facilitate employees' access to the nearest hospital and Public Health Preparedness Clinic (PHPC) in case of suspect Covid-19 cases and emergencies.

As at 30 September 2020, we had 205 foreign workers under our care. In FY2020, there were 2 direct incidents of Covid-19 transmission among foreign workers. We took the immediate conservative approach of stepping up the quarantine for the rest of the workers who are either in close proximity or using the same common areas as the 2 positive cases, at separate government facilities. This resulted in approximately 95 workers being quarantined and having 1,330 man-days lost. However, our aggressive approach in stemming the Covid-19 transmission resulted in subsequent zero further cross infections among the rest of the workers and we were able to proceed on with our project works, after the 2-week quarantine hiatus. In addition, there was no reported incident of non-compliance with local Covid-19 laws and regulations regarding the living and working conditions of our foreign workers.

OCCUPATIONAL HEALTH AND SAFETY

VISION TOWARDS AN ACCIDENT-FREE WORK CULTURE

GRI 403-1, 403-4, 403-5, 403-9

We have a Health and Safety Committee with joint management-worker representation to facilitate a positive health and safety culture. It is the responsibility of our workers that they observe all safety precautions and comply with our Safety Rules and Regulations. We implement strict safety policies on-site by mandating trainings such as Safety Induction Training and Safe Work Practices Demonstration for all workers before they are allowed to commence work on-site to help us achieve our goal of an accident-free work culture.

We believe that positive safety culture starts from the top. We have implemented the Construction Safety Audit Scoring System (ConSASS) to audit the Safety and Health Management System at our Group and worksites. We have developed the CultureSAFE programme to help us build a positive Workplace Safety and Health culture, mind-set and attitude beyond infrastructure and level of competency.

We organise a bi-annual Safety Award day for all personnel to celebrate safety milestones and reward individuals who demonstrate exemplary workplace safety behaviour and contribute to project safety. We also recite the safety pledge and conduct safety quizzes during the ceremony to promote safety awareness and inculcate safety knowledge among workers. The ceremony serves to encourage all staff and workers to continue working towards achieving our workplace health and safety targets and prioritising safety.

Keong Hong actively participated in the sharing of safety experiences gained from projects with the construction community. We were invited by Ministry of Health Holding to share our experience of utilising innovation and technology to enhance site safety at their Healthcare Infrastructure Projects Division (HIPD) Annual Workplace Safety and Health Officers Dialogue 2019.



Keong Hong was invited by Ministry of Health Holding to share experience on utilising innovation and technology to enhance safety on site at their Healthcare Infrastructure Projects Division (HIPD) Annual Workplace Safety and Health Officers Dialogue 2019

OCCUPATIONAL HEALTH AND SAFETY

In addition, we go the extra mile to perform a Pledging ceremony for all personnel before each project to formalise our commitment towards health and safety. The ceremony is led by the Group's CEO and involves senior management and representatives of subcontractors and workers. The Safety and Health Pledge is signed by everyone and posted on the entrance of the worksite. Together, we pledge to promote safety and strive for zero accident at our project sites.

INJURIES AND INCIDENTS

GRI 403-2, 403-

In FY2020, our Workplace Fatal Injury Rate is 0 and Major Injury Rate is 0.35, both well below the industrial average¹ of 2.9 and 26.6² respectively. Our safety performance in FY2020 is in line with our aim of meeting the following Occupational Health and Safety Objectives:

- Maintain formal certification of our ISO 45001:2018 safety management system and BizSafe Star
- Zero fatality
- Zero Stop Work Order
- Zero MOM demerit points
- Strive for zero reportable accident
- Reduce Workplace Fatal Injury Rate to below Industrial Standard (2.9) per project per year
- Reduce Major Injury Rate to below Industrial Standard (26.6) per project per year

To lower the risk of incidents and diseases, high-risk areas namely water bodies and food waste that attract pests such as mosquitos, flies and rodents were identified. Thereafter, we implemented corresponding preventive measures, such as constructing surface and subsoil drainage to control mosquito breeding at water bodies, and engaging NEA-approved licensed contractors to dispose food wastes and preventing food from rotting at our worksites.

1 Ministry of Manpower. (2019). *Workplace Safety and Health Report 2019*. <https://www.mom.gov.sg/-/media/mom/documents/safety-health/reports-stats/wsh-national-statistics/wsh-national-stats-2019.pdf?la=en&hash=6D52E18A099E8E83EA4F8836981F3463>

2 Workplace Injury Rate = $\frac{\text{No. of Fatal or Major Workplace Injuries}}{\text{No. of Workers}} \times 100,000$

OUR PEOPLE, OUR ASSETS

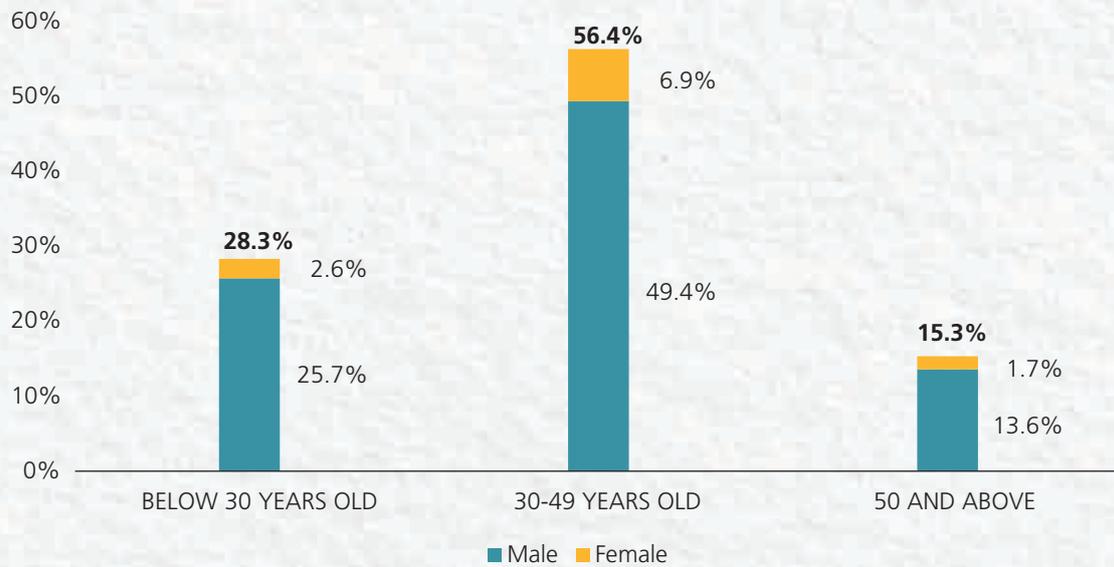
Keong Hong embraces diversity and our employee come from various walks of life. This inclusive diversity drives innovation and increases productivity and competitive advantages in our organization. We endeavour to make our workplace fair for all our staff and workers. We provide training opportunities for staff development through continuous learning and skills improvement. We strive to provide sufficient welfare standards for all our employees.

EMPLOYEE DIVERSITY

GRI 401-1, 405-1, 406-1

We value the experience and knowledge of our senior staff as well as the passion and adaptability of the younger staff. We had a total strength of 178 staff as at 30 September 2020. We have a diversified workforce consisting of employees coming from different countries such as the United Kingdom, Philippines, China, Thailand, Malaysia, Myanmar, Bangladesh and India.

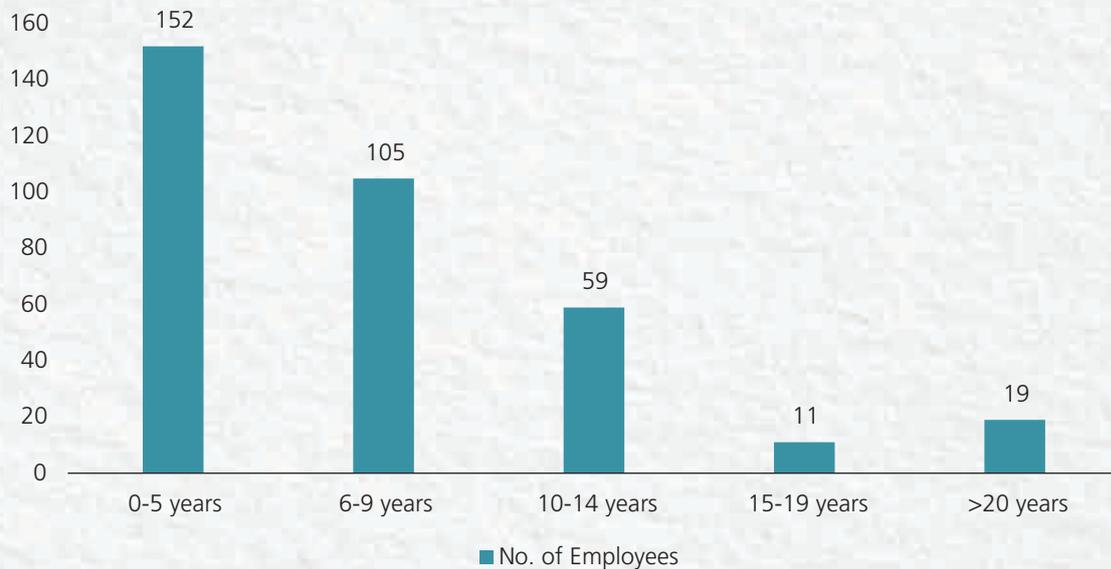
Our Workforce



In FY2020, our new hire rate was 17.17% and attrition rate was 14.68%.

OUR PEOPLE, OUR ASSETS

Employee Years of Service



We hold employee satisfaction and appreciation in high regard, and we recognise long-serving employees with annual long service awards. As we embrace diversity and encourage inclusivity, we employ workers from 8 other countries. We also recognise the contributions of all employees equally and fairly. As such, there were no incidents of discrimination in our organization, and more than half of our construction workers have been with the company for over 5 years. With 89 employees with more than 10 years of service, this is a testament of our exemplary labour management.

EMPLOYEE BENEFITS

GRI 401-2, 401-3

At Keong Hong, we prioritise the welfare of our staff and workers by entitling them to a range of benefits including healthcare and insurance, parental leave and retirement benefits where eligible as we believe in a comprehensive welfare system for our employees. Long service employees are rewarded with increases in annual paid leave. Medical benefits, dental claims and fully paid Executive Health Screenings are extended to all employees.

Every female employee is entitled up to a maximum 16 weeks of paid maternity leave while male employees are entitled up to 2 weeks of paid paternity leave. Employee's entitlement to childcare leave is in accordance to the Children Development Co-Savings Act. Adoptive parents are entitled to 12 weeks of paid adoption leave to care for their adopted infants. 2 staff took parental leave in FY2020.

The physical and mental wellbeing of our staff is integral to their career development as well as the sustainability of our growth. As such, we implemented initiatives such as building a gym facility and Cosy Corner at our Headquarters for employees to exercise regularly and enhance their work-life balance. In addition, we regularly organise recreational events such as cricket and hockey games and festival celebrations for all staff and workers, including our sub-con workers, to promote bonding and social well-being.

OUR PEOPLE, OUR ASSETS



Workers' Quarters at 9 Sungei Kadut Street 2 – clean, spacious and organised living conditions

To help promote a clean and healthy living environment for our workers, our HR executive carries out weekly inspections of workers' living quarters to ensure that they are well-maintained.

TRAINING AND CAREER DEVELOPMENT

GRI 404-1, 404-2, 404-3

Keong Hong has provided various trainings to upgrade our workforce and ensure that our staff and workers are equipped with sufficiently high standard of knowledge, skills, abilities and motivation to meet our present and future objectives and challenges.



Our upgrading programmes include certification courses for Green Mark Manager and Specialist Diploma in Construction Productivity to ensure our staff can contribute to the sustainability development of our business. We also focus on production related trainings such as Good Industry Practices, Building Information Modelling (BIM) Management and BIM (Architecture track) to further improve the quality of our business productions.

Other than providing our employees with training programs, we also sponsor deserving candidates for scholarships in tertiary education. For example, the recent scholarship recipient graduated from University of West England last year with a Master degree in Construction Project Management. We continue our ITE scholarship by sponsoring 3 ITE students for the year 2020 as part of our support for the government initiative for the ITE Work-Learn Technical Diploma programme. We pledge to continue with our efforts in developing and upgrading our staff and workers.

In FY2020, we had two new BIM modellers who successfully completed a 3-month Career Trial under the Workforce Development Agency and Ministry of Family Development which encourages employers to train and hire person with disability (PWD). Both have been trained and are now our permanent employees.

OUR PEOPLE, OUR ASSETS

Besides employees in Singapore, we also provide trainings for our staff in Maldives that are essential to their jobs. At Kooddoo Airport, all staff are trained to use SMS, a software that enables them to better manage the airport using data collected from the field. Other than training programs to make operations more efficient, we also conducted AVSECOM awareness training program for all staff to educate them on aviation security so as to enforce proper national security measures at the airport. Selected staff are also sent for Fire Fighting Training Course as part of the Aviation requirement. As we prioritise workplace safety, employees from the Safety department received basic and advanced incident investigation trainings to equip them with the knowledge and skills to conduct safety inspections so as to identify and manage hazards and potential risks.

GIVING BACK TO OUR COMMUNITY

GRI 413-1

Since the Group's beginning, we have recognised that giving back to our community is an ongoing commitment and a significant part of our efforts to make a difference to society. For many years, the Group has funded charitable organisations that focus on caring for the underprivileged, community chests, societies and religious communities. In FY2020, the Group has donated over S\$31,000 to various charitable organisations and beneficiaries which include the Singapore Contractors Association Ltd (SCAL) Covid-19 fund launched by SCAL to help the construction sector tide through Covid-19. The Fund aims to provide eligible companies with relief to ease their financial difficulties, particularly during this Circuit Breaker period where companies continue to incur operation costs, and expenses associated with taking care of their foreign employees placed under Stay-Home Notice (SHN).

We also made donations to other charitable and social causes such as Singapore Association for Mental Health and The Singapore Scout Association. The Group places emphasis on dedicating resources towards the development of local communities and future leaders by investing in educational institutes and bursaries.

The Group has also been channelling a significant part of our efforts and resources into developing the talent pool for our industry. In FY2020, the Group has donated over \$1,156 to bursaries and educational institutes. We have awarded scholarships and bursaries to deserving recipients for their pursuit of tertiary education.

More recently, we have worked closely with United Nations Development Programme (UNDP) to achieve global Sustainable Development Goals (SDGs) to create sustainable localised solutions to the population. We have received several appreciation letters commending our efforts and commitment to the UNDP. Both resorts in Maldives have achieved platinum status in Planet 21, Accor's sustainable green platform.

Keong Hong will continue with our contributions to the community and fulfil our duty as a socially responsible corporation.

FINES OR PENALTY

GRI 419-1

There were zero incidents of non-compliance with socioeconomic laws and regulations in FY2020.

SGX FIVE PRIMARY COMPONENTS INDEX

S/N	Primary Component	Section Reference
1	Material Topics	<ul style="list-style-type: none"> • Economic, Environmental and Social Topics • Stakeholder Engagement
2	Policies, Practices and Performance	<ul style="list-style-type: none"> • Chairman's Message • Keong Hong's Sustainability Story • Economic, Environmental and Social Topics
3	Board Statement	<ul style="list-style-type: none"> • Governance and Statement of the Board
4	Targets	<ul style="list-style-type: none"> • Keong Hong's Sustainability Story
5	Framework	<ul style="list-style-type: none"> • Reporting Practice

GRI STANDARDS CONTENT INDEX

GRI Standards	Disclosure Content	Section Reference
102-1	Name of the organisation	Organisation Profile
102-2	Activities, brands, products, and services	Organisation Profile
102-3	Location of headquarters	Organisation Profile
102-4	Location of operations	Organisation Profile
102-5	Ownership and legal form	Organisation Profile
102-6	Markets served	Organisation Profile
102-7	Scale of the organisation	Organisation Profile
102-8	Information on employees and other workers	Organisation Profile
102-9	Supply chain	Organisation Profile
102-10	Significant changes to the organisation and its supply chain	Organisation Profile
102-11	Precautionary Principle or approach	Organisation Profile
102-12	External initiatives	Organisation Profile
102-13	Membership of associations	Organisation Profile
102-14	Statement from senior decision-maker	Chairman and Chief Executive Officer's Message
102-15	Key impacts, risks, and opportunities	Chairman and Chief Executive Officer's Message, Keong Hong's Sustainability Story
102-16	Values, principles, standards, and norms of behaviour	Ethics and Integrity
102-17	Mechanisms for advice and concerns about ethics	Ethics and Integrity
102-18	Governance structure	Governance and Statement of the Board
102-40	List of stakeholder Companies	Stakeholder Engagement
102-42	Identifying and selecting stakeholders	Stakeholder Engagement
102-43	Approach to stakeholder engagement	Stakeholder Engagement
102-44	Key topics and concerns raised	Stakeholder Engagement
102-46	Defining report content and topic boundaries	Reporting Practice
201-4	Financial assistance received from government	Financial Assistance Received from Government
202-2	Proportion of senior management hired from the local community	Market Presence
203-1	Infrastructure investments and services supported	Developing Technology & Indirect Economic Impacts
203-2	Significant indirect economic impacts	Developing Technology & Indirect Economic Impacts
204-1	Proportion of spending on local suppliers	Developing Technology & Indirect Economic Impacts
205-1	Operations assessed for risks related to corruption	Anti-corruption
205-2	Communication and training on anti-corruption policies and procedures	Anti-corruption
205-3	Confirmed incidents of corruption and actions taken	Anti-corruption
301-2	Recycled input materials used	Recycled Input Materials

GRI STANDARDS CONTENT INDEX

GRI Standards	Disclosure Content	Section Reference
302-1	Energy consumption within the organisation	Energy and Emissions Management
302-4	Reduction of energy consumption	Energy and Emissions Management
302-5	Reductions in energy requirements of products and services	Energy and Emissions Management
303-1	Water withdrawal by source	Water Management
303-2	Water sources significantly affected by withdrawal of water	Water Management
303-3	Water recycled and reused	Water Management
304-2	Significant impacts of activities, products, and services on biodiversity	Managing Biodiversity
304-3	Habitats protected or restored	Managing Biodiversity
305-2	Energy Indirect Greenhouse Gas Emissions (Scope 2)	Energy and Emissions Management
305-5	Reductions in Greenhouse Gas Emissions	Energy and Emissions Management
306-1	Total water discharged by quality and destination	Effluents and Waste Management
306-2	Waste by type and disposal method	Effluents and Waste Management
306-5	Water bodies affected by water discharges and/or runoff	Effluents and Waste Management
307-1	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	Environmental Compliance
308-1	Percentage of new suppliers that were screened using environmental criteria	Managing Our Suppliers
308-2	Significant actual and potential negative environmental impacts in the supply chain and actions taken	Managing Our Suppliers
401-1	New employee hires and employee turnover	Employee Diversity
401-2	Benefits provided to full time employees that are not provided to temporary or part-time employees	Employee Benefits
401-3	Parental leave	Employee Benefits
404-1	Average hours of training per year per employee	Training and Career Development
404-2	Programmes for upgrading employee skills and transition assistance programmes	Training and Career Development
404-3	Regular performance and career development review	Training and Career Development
405-1	Diversity of governance bodies and employees	Employee Diversity
406-1	Incidents of discrimination and corrective actions taken	Employee Diversity
408-1	Operations and suppliers at significant risk for incidents of child labour	Managing our Suppliers
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	Managing our Suppliers
413-1	Operations with local community engagement, impact assessments, and development programmes	Giving Back to Our Community Noise and Vector Management

GRI STANDARDS CONTENT INDEX

GRI Standards	Disclosure Content	Section Reference
414-1	New suppliers that were screened using social criteria	Managing our Suppliers
414-2	Negative social impacts in the supply chain and actions taken	Managing our Suppliers
416-1	Assessment of the health and safety impacts of product and service categories	Safety Measures Against Covid-19 in Maldives
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Safety Measures Against Covid-19 in Maldives
418-1	Substantiated complaints concerning breaches of customer privacy and customer data loss	Protecting Customer Privacy and Data
419-1	Non-compliance with laws and regulations in the social and economic area	Fines or Penalty