



**NEW TOYO**  
International Holdings Ltd

SUSTAINABILITY REPORT  
**2020**

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# MESSAGE FROM THE BOARD OF DIRECTORS

“ Our business and our sustainability are based on the same fundamentals, an unwavering focus on optimal efficiency and superior quality that guarantees customer satisfaction while promoting the interests of all our stakeholders. ”

## DEAR STAKEHOLDERS,

We have always looked beyond productivity and profitability to focus on long-term sustainability as we endeavour to be a company dedicated to leaving behind the best legacy for our future generations. The foundation of our sustainability approach is an overall risk strategy framework for sustainability management with comprehensive measures in place governing environmental, social and governance matters. This overarching framework ensures our business practices adhere to our commitment to abide by the fundamental principles of sustainability. This commitment also matches our customers’ recognition of the importance of sustainability in their supply chains. As a result, this enhances our reputation and relationship among our stakeholders. It also places emphasis on embedding sustainability within the company that governs our responsible stewardship of the environment. Not only does this allow us to bolster compliance with all applicable environmental laws and regulations, it helps to provide for our employees’ welfare at the same time.

Our pledge to focus on sustainability begins in our initial production processes and reflects an on-going commitment to embed sustainability upwards and throughout the entire supply chain, by working alongside with relevant stakeholders to reduce environmental impacts and to promote employee prosperity and safety in the Group.

We believe that developing a strong foundation of environmental sustainability is contingent on effective planning and a responsible and efficient



use of raw materials, thereby reducing waste. The Group’s success is also dependent on our employees; therefore their welfare, safety and security are our utmost priority. It is also vital that we empower and enable local communities in the regions we operate in, especially relevant in our low-cost based operations in some of ASEAN’s rapidly-developing economies, such as Vietnam.

At its heart, this sustainability report highlights our commitment to ensure sustainability is integrated within the company. It outlines our approach to sustainability, from the implementation of our strategies in our business practices to how we encourage performance in the achievement of our targets, all while ensuring the safety and welfare of our employees. We are driven by our sustainability ambitions and remain focused on creating long-term sustainable value for all our key stakeholders.

# ABOUT NEW TOYO

“ For the past 40 years, New Toyo has built a reputation as a respectable value-added supplier of quality products and services. We continuously endeavour to improve productivity and align with current trends in the packaging industry as we strive to be the supplier of choice for our customers. ”



## OUR VISION

To be the preferred supplier of consistently high-quality packaging materials

New Toyo International Holdings Ltd (“New Toyo”) is a leading regional supplier and key player in the provision of high-quality specialty packaging materials to the tobacco, food and beverage, wine, liquor and cosmetics industries in Asia Pacific. New Toyo was founded in 1975, and its listing on the Mainboard of the Singapore Exchange dates back to 4 April 1997. Stemming from our headquarters in Singapore, we have employees numbering 1,257 as our operations and activities are positioned regionally to strategically provide tailored solutions to both our local and global clients. The backbone of our solid manufacturing base consists of multiple facilities in key geographical locations in four countries, Singapore, Malaysia, Vietnam and Dubai. This regional presence allows us to provide timely support to our customers in these markets, promoting our Group’s focus on fulfilling customer needs and perfecting the quality of our products.

New Toyo has two core business divisions:

The **Specialty Papers (“SP”)** division focuses on providing laminated and/or coated paper and paperboards in reel form or in sheets for customers in the food and beverage, alcohol, tobacco and cosmetics industries. These products are primarily used in the packaging of cigarettes, food, beverages, wine and liquor, tissues and cosmetics, as well as for labelling and gift-wrapping.

The **Printed Cartons and Labels (“PCL”)** division offers mainly gravure and lithography printing. Gravure printing is a specialised high-speed printing process essential to the printing of high quality paper prints, mainly for cigarette packaging. Lithography or offset printing is primarily for the supply of folded cartons and labels for rapid selling consumer goods.

In addition, the Group has a trading business that centres on the sale of raw materials, paper products and equipment.

# OUR SUSTAINABILITY ETHOS

“ To do our part to Safeguard our Environment and better the lives of Our People and the Communities where we Work and Live. ”

At New Toyo, we adopt a proactive approach towards embedding sustainability practices into our business. We continuously evaluate how to run our operations in a more productive and efficient manner, and how to ensure ongoing engagement with key stakeholders in order to grow and nurture a positive influence on future generations and our relationship with them. We recognise that prioritising sustainability issues is crucial to our reputation in the market and to our bonds with each and every one of our stakeholders.

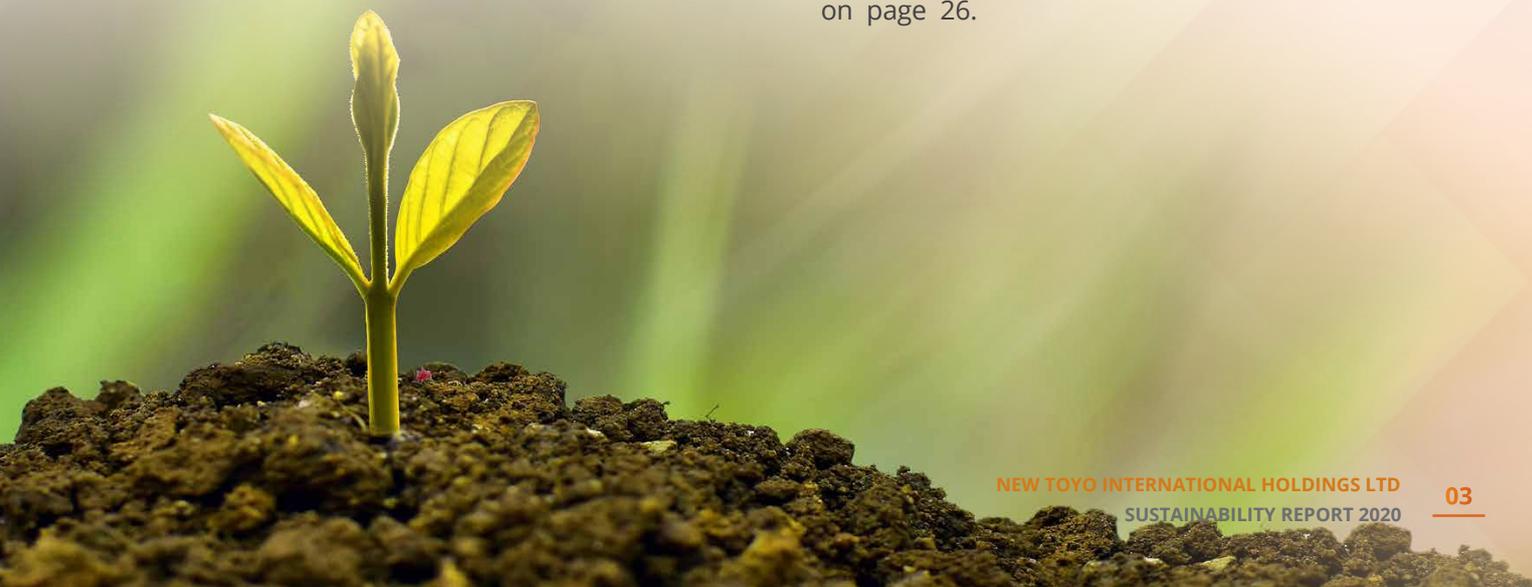
**Our approach** to sustainability encompasses the supply chain in its entirety, from raw materials and conversion to the eventual provision of products for our customers. Through effective planning, this has allowed us to limit the use of natural resources needed to produce paper, paper board and aluminium foil. This is made possible because of our constant strive for improvement and therefore the emphasis we place on continuously reviewing our processes.

We require all of our suppliers to read and formally acknowledge that they would adhere to the New Toyo's Supplier Code of Conduct policy ("Supplier CoC"), so as to ensure alignment throughout our supply chain.

The Supplier CoC encourages our suppliers to regard sustainability not only as a set of rules for compliance and prompts them to view sustainability as a key underlying principle guiding the conduct of business. The Supplier CoC provides guidelines on numerous issues, from ethics in business dealings and adherence to applicable laws and regulations, and environmental stewardship.

Aligning with these principles, we proudly reiterate that, according to our expectations, no product of ours has been restricted in any of the markets where we operate.

It is our belief that a responsible conduct of business involves maintaining the right attitude and mind-set to enhance ethical and responsible behaviour. For additional details on our management of raw materials and engagement with suppliers, please refer to Materials and Responsible Sourcing on page 26.



# HOW WE CREATE VALUE SUSTAINABLY

In our pursuit to deliver quality products and services, we believe in ensuring that sustainability underpins our entire supply chain, from the raw materials we use to the distribution of final products to our customers. By integrating sustainability throughout our manufacturing process, we aim to create value for our stakeholders through a safe and environmentally sound approach.

## 1. OUR INPUTS

### Materials We Use

#### Base materials

Proactive planning allows us to obtain base materials that closely match the dimensions of our final products' specifications. We thereby reduce wastage and consequently consume fewer natural resources.

#### Other raw materials

We always encourage our customers to use water-based inks as they are more environmentally friendly.

### Our Expertise and Capabilities

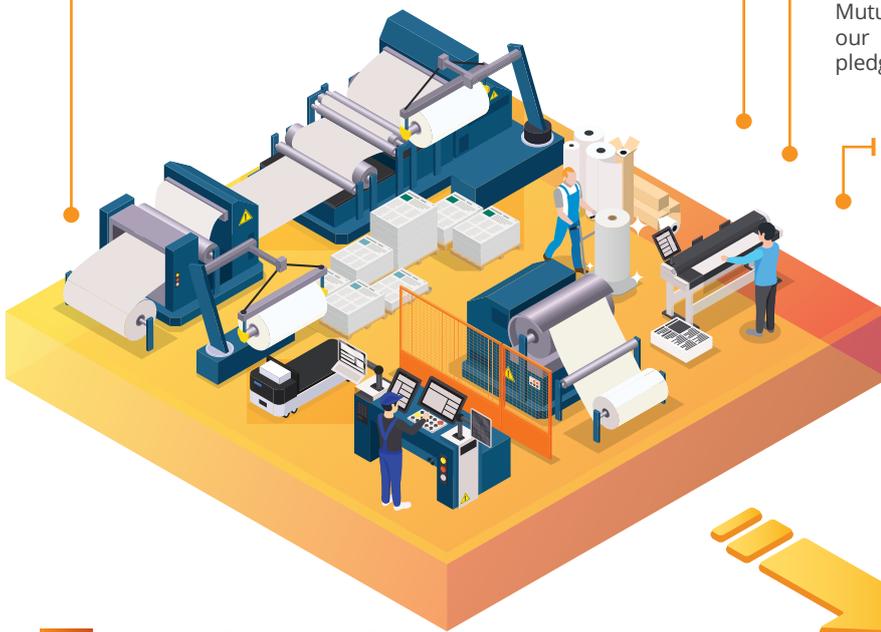
Totalling more than 40 years of experience, New Toyo has established a reputation as a value-added provider of quality products and services. We uphold our commitment to upgrade our technology and to focus on employee development through rigorous training programmes that enhance productivity.

### Our Relationships with Customers

Mutually beneficial and long-term relationships with our customers are built through an unwavering pledge to quality and customer service excellence.

### Our Safety Culture

The safety and well-being of our employees are prioritised by adopting procedures to minimise potential hazards and risks.



## 2. HOW WE MANAGE OUR MANUFACTURING PROCESS

### People

#### Personnel planning

Operational efficiency and productivity are achieved through meticulous and well-considered planning and procedures.

#### Job scheduling

Appropriate personnel and manpower resources scheduling allows for sufficient rest for staff between and before their shifts. Healthy work practices are instilled in all operations to enhance efficiency while also providing for employee well-being and reducing accident and injury risks.

#### Electricity

Machine maintenance is regularly scheduled with the intent to minimise machine downtime and in turn, leads to a reduced carbon footprint. As our machineries consume additional electricity when switching from a disconnected to a running mode, as compared to running continuously, a reduction in machine downtime enable us to minimise environmental impacts.

#### Water

In comparison with the typical manufacturing plant, our manufacturing facilities require less water as our water usage is less intensive than other heavy industries. Regardless, environmental concerns remain a top priority at New Toyo, and we monitor our water consumption patterns closely to find ways to minimise water usage where feasible.



### 3. HOW WE DISTRIBUTE

#### On-Time-In-Full Delivery

We reduce necessity for last minute urgent deliveries by providing on-time and full delivery of orders, consequently limiting our environmental impact.

#### Strategically Located Facilities

Our customers receive immediate assistance due to our robust manufacturing base and facilities strategically placed in the Asia Pacific and Middle East. Our regional representation means we are always an arm's reach from our customers. This results in reduced distances and travel times for product delivery, in turn bringing down costs and minimising our environmental impact.

#### Delivery Planning

To decrease our carbon footprint, freight delivery is optimised by efficient use of container capacity and increased coordination with our customers.

#### Quality

Quality products are guaranteed as our production plants have achieved ISO 9001 certification. The assurance of quality leads to a reduced consumption of resources as fewer internal and external rejects translates into savings on materials, energy, transport and labour needed for rectification and replacement.

#### Waste Management

Licensed and locally registered contractors are requisitioned for waste disposal to provide proper adherence to local laws and conditions.

#### Packaging

All items are securely packed and enclosed, leading to products that retain their quality during the delivery journey even when facing exposure to the elements. Rejects on the customer end are thus reduced, which limits consumption of raw materials, energy, transport and labour costs incurred when replacing damaged products.

## VALUE WE CREATE



### Resource Efficiency

Energy intensity ratio maintained below **500** kilojoules (kJ) annually.



### Customer Satisfaction

Maintained **4** out of **5** customer satisfaction rating.



**Job Creation for the Local Community**  
**44** new employee hires.

# ABOUT THIS REPORT

“ Our stakeholders’ expectations are upheld by going beyond regulatory compliance to conduct business sustainability. Our sustainability methods align with our customers’ practices over four decades, emphasising honesty, integrity and a dedication to excellence. ”

Subsequent to our first report in 2018, our sustainability report serves as a complement to the annual report. The reporting scope for financial year 2020 covers four countries of operation – Singapore, Malaysia, Vietnam and Dubai.

This sustainability report focuses on the three core areas of environmental, social and governance (“ESG”) topics prioritised by our stakeholders. Detailed information on our material ESG topics and the ways our operations interact with society and the environment are provided in the following sections.

The present sustainability report focuses on how the SP division is representative of our material ESG topics, with our PCL division reported in a separate report by our subsidiary, Tien Wah Press Holdings (“TWPH”) as TWPH is listed on Bursa Malaysia and subject to Bursa’s sustainability reporting requirements<sup>1</sup>. Absent as well from this report, is the Trading division as it functions as an intermediary in the buying and selling of materials, with minimal sustainability impact. Periodic reviews of the materiality of the Trading division as part of a due diligence process are considered for potential inclusion in future sustainability reports.

Our stakeholder engagement exercise compiles feedback on our material ESG topics gathered through various stakeholders, with a focus on stakeholder inclusiveness, completeness and balanced reporting. For more details, please refer to our Materiality section on page 14.

Guided by best practices, our sustainability reporting aligns with the Global Reporting Initiative (“GRI”) Standards framework for clear specifications that ensure reporting accuracy and enable us to benchmark our performance against peers. This report has been prepared in accordance with the GRI Standards: Core option. In aligning with previous years’ reports, external assurance has not been sought with this choice re-evaluated as necessary into future reports where relevant and prudent. Sustainability remains a cornerstone of our organisation, and we endeavour to embed key sustainability-related metrics into our management systems. Our ongoing efforts will allow us to enhance our sustainability reporting further by remaining cognisant of the changing business environment and adopting relevant KPI where necessary to safeguard our organisation’s long-term sustainability.

A complete and transparent perspective of our Group’s performance inclusive of environmental, social and economic factors can be accessed by reviewing this report together with our most recent annual report, which provides details of our financial performance and our approach to corporate governance and risk management. Please refer to our 2020 annual report at [newtoyo.com](http://newtoyo.com) for further information.

Standard units of measurement are employed for this report. Any necessary and applicable conversion factors, in addition to the computational basis for certain metrics, are provided in respective sections.

Please address any queries in connection to this report to [enquiry@newtoyo.com](mailto:enquiry@newtoyo.com).

<sup>1</sup> For more information on PCL’s Sustainability Approach and Statement, please refer to the TWPH website or link at <https://www.tienwah.com/annual-report>.

# SUSTAINABILITY KEY HIGHLIGHTS

## Our Customers



Product Quality

(2019: 4 out of 5)



Quality of Packaging  
for product supplied

(2019: 4 out of 5)

2020

0

No. of customer complaints  
concerning breaches of customer  
privacy and losses of customer data

(2019: 0)

Rating scale of 1 (lowest) to 5 (highest)

## Our People

	By Gender				By Region							
	Male		Female		Singapore		Malaysia		Vietnam		Dubai	
	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
No. of work-related injuries resulting in fatality <sup>2</sup>	NA	NA	NA	NA	0	0	0	0	0	0	0	0
No. of high-consequences work-related injuries (excluding fatalities) <sup>2</sup>	NA	NA	NA	NA	NA <sup>3</sup>	0						
No. of recordable work-related injuries	16	8	0	0	11	0	5	5	0	1	0	2
Absentee Rate	1.4%	1.8%	0.6%	0.5%	4.5%	4.7%	1.3%	1.3%	0.4%	0.4%	0%	4.2%
Total number of new employee hires	72	40	22	4	11	5	22	16	58	21	3	2
New employee hires rate	14.4%	8.8%	4.4%	0.9%	2.2%	1.1%	4.4%	3.5%	11.6%	4.6%	0.6%	0.5%
Total number of employee turnover	121	46	29	9	12	10	26	16	111	29	1	0
Employee turnover rate	24.2%	10.2%	5.8%	2.0%	2.5%	2.3%	5.2%	3.5%	22.1%	6.4%	0.2%	0%
Average hours of training per employee	9.7	4.7	9.1	4.3	NA	NA	NA	NA	NA	NA	NA	NA

<sup>2</sup> Disclosure by gender is not required.

<sup>3</sup> 2020 is the first year in which this number is tracked.

# SUSTAINABILITY KEY HIGHLIGHTS

Our People										
	By Year		By Region							
	In Total		Singapore		Malaysia		Vietnam		Dubai	
	2019	2020	2019	2020	2019	2020	2019	2020	2019	2020
 Injury rate (per million man-hours worked)	9.5	6.3	49.0	0	9.1	10.2	0	2.0	0	30.8

Age Group							
	<30 years		30 to 50 years		>50 years		
	2019	2020	2019	2020	2019	2020	
 Total number of new employee hires	60	20	32	21	2	3	
 New employee hires rate	12.0%	4.4%	6.4%	4.6%	0.4%	0.7%	
 Employee turnover rate	15.3%	5.8%	13.9%	4.2%	0.8%	2.2%	

By Region								
	Singapore		Malaysia		Vietnam		Dubai	
	2019	2020	2019	2020	2019	2020	2019	2020
 Total number of new employee hires	11	5	22	16	58	21	3	2
 New employee hires rate	2.2%	1.1%	4.4%	3.5%	11.6%	4.6%	0.6%	0.5%
 Employee turnover rate	2.5%	2.3%	5.2%	3.5%	22.1%	6.4%	0.2%	0%

Average hours of training per employee (by employee category)	2019	2020
 Senior Management	22.0	24.0
 Management	17.8	6.8
 Senior	11.4	2.9
 Junior	6.4	2.7
 Non-clerical	8.6	4.8

No. of discrimination incidents	2019	2020
Number of discrimination incidents	0	0

Our Environment*		
	2019	2020
Percentage of recycled input materials used for manufacture of primary products	10.2%	5.0%
Scrap materials sent for recycling	2,761 Tonnes	1,743 Tonnes
Energy intensity ratio (per dollar revenue)	425 Kilojoules	472 Kilojoules
Water obtained from municipal water supplies	29.4 Mega Litres	21.2 Mega Litres
Instances of non-compliance with environmental laws and regulations	0	0
Instances of non-compliance with laws and regulations in the social and economic area	0	0

Responsible Sourcing		
	2019	2020
No. of legal actions for anti-competitive, anti-trust and monopoly practices	0	0

\* Disclosures under Our Environment are voluntary.

# OUR APPROACH

Sound business strategies underpin and guarantee our Group's capacity to create and leverage growth opportunities. Proactively integrating sustainability throughout our operations is a testimony of our commitment towards sustainability awareness and its vital role in strengthening our appeal to our customers.

## OUR CORE VALUES



### Our Sustainability Journey

2017: Where We Were	2018: Setting KPIs on our Material Issues	2019: Where We Are Now and What We Have Achieved	2020: How we maintain and remain relevant
<ul style="list-style-type: none"> <li>✓ Establishment of the Sustainability Reporting Committee</li> <li>✓ Inaugural sustainability report published in accordance with GRI Standards: Core Option</li> <li>✓ Scope: SP Division in Singapore, Malaysia, Vietnam</li> </ul>	<ul style="list-style-type: none"> <li>✓ Second sustainability report published in accordance with GRI Standards: Core Option</li> <li>✓ Reviewed performance against KPIs for material issues environmental, social and governance ("ESG") topics</li> <li>✓ Established FY2019 targets for material ESG topics</li> <li>✓ Scope: SP Division in Singapore, Malaysia, Vietnam and Dubai</li> </ul>	<ul style="list-style-type: none"> <li>✓ Third sustainability report published in accordance with GRI Standards: Core Option</li> <li>✓ Reviewed 2019 results against target KPIs set for material ESG topics in 2018</li> <li>✓ Scope: SP Division in Singapore, Malaysia, Vietnam and Dubai</li> </ul>	<ul style="list-style-type: none"> <li>✓ Fourth sustainability report published in accordance with GRI Standards: Core Option</li> <li>✓ Revised disclosures in accordance with the GRI Standards 2018 update to ensure compliance with the revised version of GRI 303 and GRI 403</li> <li>✓ Reviewed 2020 results against target KPIs set for material ESG topics in 2019</li> <li>✓ Scope: SP Division in Singapore, Malaysia, Vietnam and Dubai</li> </ul>

# OUR APPROACH

## NEW TOYO'S SUSTAINABILITY STRATEGY

Sustainability targets are met by our business via our sustainability strategy, which promotes sustainable growth and rewards aligned with our efforts and investments in the present and future.

 SUSTAINABILITY GOALS	 STRATEGY
<b>TO BE THE SUPPLIER OF CHOICE</b>	<ul style="list-style-type: none"> <li>✓ Increase product satisfaction</li> <li>✓ Increase packaging satisfaction</li> <li>✓ Refer to page 15 for more information on Our Customers</li> </ul>
<b>TO BE ENVIRONMENTALLY CONSCIOUS</b>	<ul style="list-style-type: none"> <li>✓ Improve energy efficiency</li> <li>✓ Use recycled materials where possible</li> <li>✓ Minimise wastage</li> <li>✓ Refer to pages 22-24 for more information on Environment</li> </ul>
<b>TO BE THE EMPLOYER OF CHOICE</b>	<ul style="list-style-type: none"> <li>✓ Improve training hours</li> <li>✓ Keep health and safety incidents to a minimum</li> <li>✓ Refer to pages 16-21 for more information on Our People</li> </ul>
<b>TO BE A PROACTIVE CORPORATE CITIZEN</b>	<ul style="list-style-type: none"> <li>✓ Invest in the community through social giving</li> <li>✓ Refer to page 25 for more information on Community</li> </ul>

## GOVERNANCE

### SUSTAINABILITY GOVERNANCE STRUCTURE



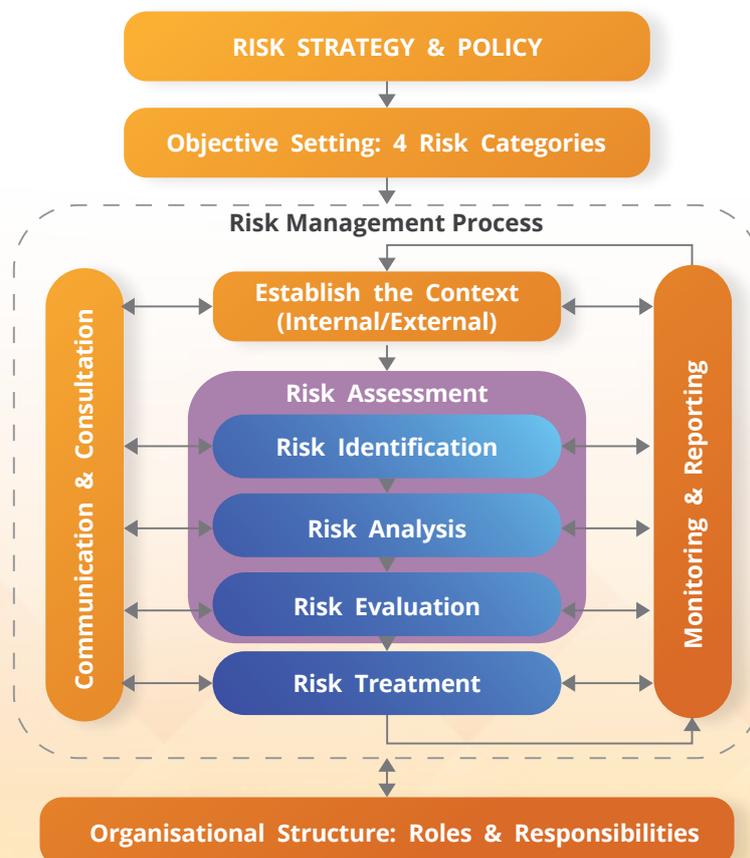
# OUR APPROACH

As a long-term approach to creating value, sustainability has been increasingly embraced by leading corporations. Recognising this, we launched the Sustainability Reporting Committee (“SRC”) in early 2017 to steer and supervise the growth of New Toyo’s sustainability policies and practices. Guided by this implementation, the Board is responsible for the oversight of New Toyo’s overall sustainability practices, and the SRC’s updates to the Group Chief Executive Officer and the Chief Financial Officer keep the Board abreast of relevant sustainability issues. The Board is responsible for ensuring sustainability is upheld in a diligent manner throughout all levels of the organisation. The Board reviews all identified material ESG topics when considering decision to New Toyo’s strategic planning and development.

Our outlook on sustainability is enhanced by our well-established governance structures and proactive method of risk management. Please refer to the Corporate Governance Statement in our 2020 Annual Report for further details regarding our corporate structures, practices and policies.

## Risk Management

Our Enterprise Risk Management (“ERM”) structure is a tool that allows us to capture emerging opportunities and to mitigate adverse effects of strategic, financial, operational and compliance risks. Sustainability topics are identified accordingly in the event that such risks emerge. We recognise that each business unit operates within a unique business environment, with a distinctive set of risks and opportunities. With this in mind, it is recommended that we follow ERM in spirit and substance, rather than in form, while attending to the unique circumstances and requirements encountered by each unit. Please see the Risk Management and Internal Controls section in our 2020 Annual Report for further information on our practices and policies.



# OUR APPROACH

## Business Continuity Management

At New Toyo, sustainability functions are a vital aspect to progressively manage challenges within the community, environment and business to reduce the impacts of adverse events on our people and the local community, and to minimise any form of disruption in our supply to our customers.

Business continuity management considers options to:

- Ensure our employees' safety and well-being are of utmost importance
- Enable containment actions to control damage to the factory, personnel and surrounding areas
- Reduce harm to production equipment due to emergencies, such as a fire
- Minimise disruption to operations and damage to factory resources
- Redirect shipments to alternative production facilities should our customers experience disruptions at their site
- Facilitate immediate information sharing on matters of emergency response and safety

This plan is checked frequently each year to ensure its robustness and continued viability and reliability.

## Ethical Standards

Our clients can be assured that we focus on reliability, dependability and transparency through the adoption of ethical standards in our business practices, including all liaisons with clients, suppliers and investors. This augments the stability of our entire supply chain, resulting in long-term sustainability. Ethical standards are followed strictly, particularly when it comes to anti-competitive behaviour, anti-trust and monopoly issues and customer privacy. All employees acknowledge that they have read, comprehend and follow our Code of Conduct ("Code") as a way of prompting them to rigorously adhere to ethical standards. The Code is a key inclusion in each new employee's orientation session. This covers all measures of compliance with relevant laws, rules and regulations, including matters related to insider trading, fraud and anti-counterfeiting. These policies form the basis of our anti-corruption ethos as stressed in the Code.

Alongside the Code, our whistle-blowing policy provides an avenue for employees to relay concerns connected to possible financial reporting infringements or other relevant matters. Each employee is familiarised with this policy on his or her introduction to the company.

All employees are provided means to raise any matters they may have in good faith to New Toyo's designated receiving officer, the chairman of the Audit Committee. An open avenue of contact values respect for anonymity and underlines our pledge of a workplace where employees are able to share concerns without fear.

Our Employee Handbook provides all New Toyo employees with guidance on ethical matters, particularly addressing policies and procedures for data protection and confidentiality. The handbook is acknowledged by each new worker as he or she begins with the company.

In line with our expectations, no incidents of non-compliance with laws and regulations in the social and economic areas occurred for year 2020. In addition, there were no recorded incidents of breaches of customer privacy or losses of customer data, and no legal actions were brought against New Toyo anti-competitive behaviour or anti-trust and monopoly practices. We endeavour to continue adhering to this perfect record as ensuring compliance minimises the company's exposure to risk in the form of reputational damage.

Investing in stable, long-term returns for our stakeholders remains our highest priority. Sustainability governance advocated throughout our operations enables us to align economic, environmental and social performance, in line with our core values and culture as directed by our top management's guidance.

## SOCIO-ECONOMIC COMPLIANCE TRACK RECORD

0 incidents of non-compliance with socio-economic laws and regulations  
(2019: 0 incidents)

### Stakeholder Engagement

How we engage our Key Stakeholders

Stakeholder Group	Engagement Methods and Frequency	Key Topics and Concerns	How New Toyo has responded
 Customers	<ul style="list-style-type: none"> <li>Annual Customer Satisfaction Survey</li> </ul>	Provide consistent product and service quality	See: Customer Satisfaction, page 15
 Suppliers	<ul style="list-style-type: none"> <li>Regular business meetings, emails and ad-hoc telephone calls</li> </ul>	Ensure safe working conditions and compliance with locally relevant laws and regulations	See: Responsible Sourcing, page 26
 Investors	<ul style="list-style-type: none"> <li>Annual general meetings</li> <li>Half-yearly results announcements</li> <li>Regular stock exchange releases online</li> </ul>	Give timely and regular updates on financial performance, business strategies and other investor related issues	See: Governance, Risk Management, pages 10-11 About This Report, page 6
 Board of Directors	<ul style="list-style-type: none"> <li>Regular Board and Board committee meetings (See: Corporate Governance Statement in our Annual Report)</li> </ul>	Guarantee business operations comply with laws and regulations	See: Ethical Standards, page 12 Environment, pages 22-24
 Employees	<ul style="list-style-type: none"> <li>Annual/On-going performance evaluation for all Employees</li> </ul>	Facilitate and increase employee commitment and loyalty	See: Our People, pages 16-21

We foster close relationships with our stakeholders by engaging them on matters of mutual importance and prioritised on a long-term basis via multiple avenues, such as regular customer surveys and shareholder meetings. To achieve this, stakeholder engagement is upheld as we pledge to position stakeholder considerations topmost among the material matters vital to us.

In accordance with our last sustainability exercise, we emphasise five stakeholder groups in relation to their influence and involvement with New Toyo:

- Customers
- Suppliers
- Investors
- Board of Directors
- Employees (represented by management personnel from our SP division units)

# OUR APPROACH

## Materiality

Traditional means of financial reporting are enhanced with additional measures as we honour our commitment to sharing *material* information with our stakeholders on important items. Material topics have an impact on how stakeholders perceive New Toyo, and can materially impact our long-term financial performance; consequently, the needs of stakeholders are prioritised when classifying the material ESG topics.

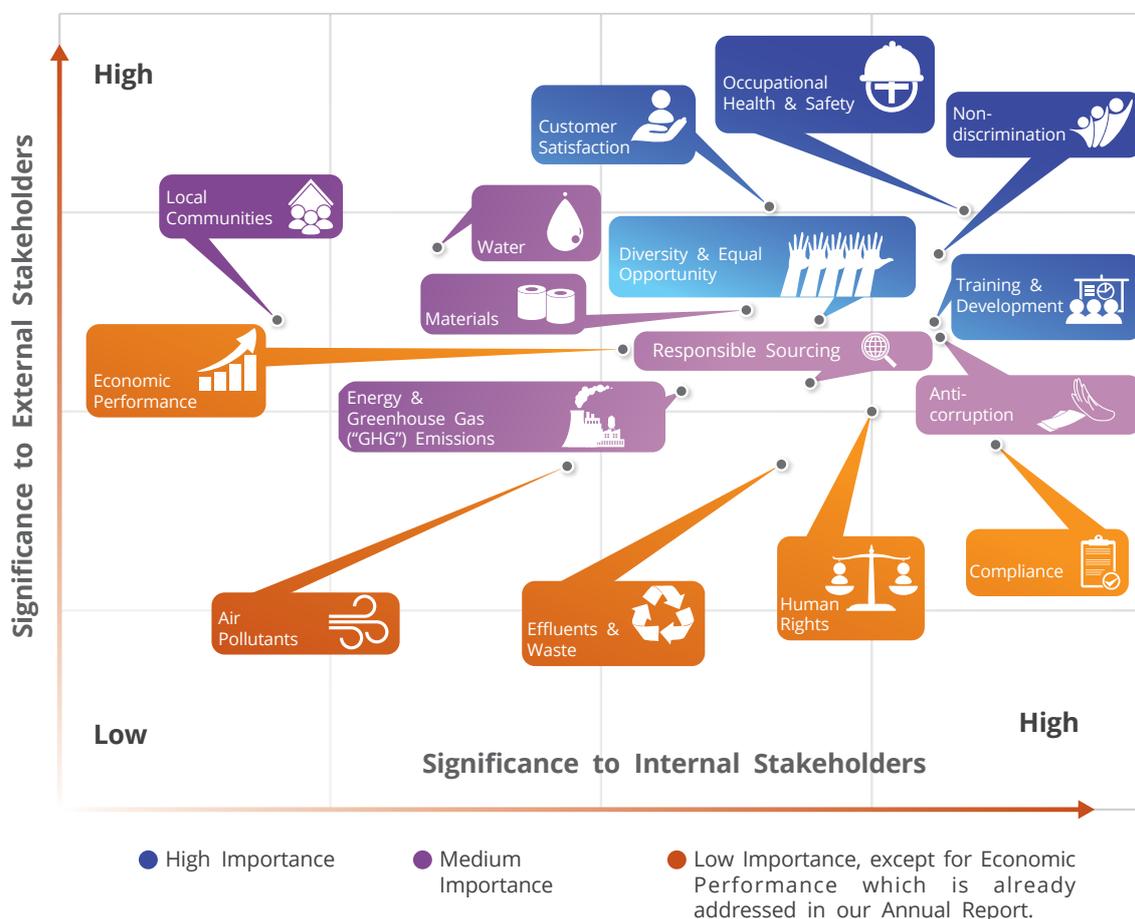
In the materiality assessment performance of year 2017, we worked with an independent sustainability consultant, and the survey results indicated our stakeholders were satisfied with our management of the material topics. In the formal process of the survey:

- Topics were first identified and validated by the Sustainability Reporting Committee;
- Stakeholders were invited to rank the topics by their significance;
- Material ESG topics were identified through means of a materiality assessment workshop with the presence of the Board and top management.

New Toyo has formulated the 2020 sustainability report according to these ESG topics and in accordance with the GRI Principles.

Targets for material topics identified as **High Priority**, as well as their corresponding control mechanisms, were built to benchmark our performance based on these targets. We are pleased to announce that all targets were achieved or maintained. Moving forward, we will continue to monitor and ensure we make continuous improvements on our material ESG topics.

Reviewing the materiality of ESG topics will ensure their continued relevance to future changes in the operational environment.



# OUR CUSTOMERS

“ Our customers are continually provided excellent services and quality products as we regard their satisfaction to be the measure of our success and enhancement of our reputation in the field. In order to maintain this status, we continuously interact with clients by engaging in proactive relations and soliciting feedback on the continuing strength of our interconnections. ”

Word of mouth marketing via our customers is a recognition and validation of our achievements. Being a global brand, we strive for excellence in customer service. Our highly satisfied and engaged customers allow us to stand out in the field of our competition and enable us to lead in capturing emerging opportunities. Customer tours of our operations and audits are welcome as they enable our customers to better understand our working environment, people and production activities.

An excellent customer experience begins with the first point of contact with the customer. As the relationship grows, we are able to identify the customers' needs and provide them with on time delivery of top-quality products and acclaimed after sales support.

Our goal is a smooth and timely delivery of product supply to our clients, but there are times when extenuating circumstances impact our operations, including those of our customers, and this may affect our ability to deliver to the intended destinations. Regionally challenging conditions, such as floods, earthquakes and political instability, may lead to scenarios that impact the supply chain. In line with our promise to our customers, we continuously monitor safety measures that mitigate and alleviate external risks. Our business continuity management system identifies contingency locations within the Group and our customers' supply chains. The effectiveness of these measures is regularly reviewed to allow us to efficiently and swiftly activate these procedures if the need arises. Such measures include sourcing alternative sites for raw materials and rerouting goods to ensure continuity of supply.

Based on our customers' feedback, the quality control department coordinates with relevant departments to jointly investigate and determine the primary source of the problem, followed by recommendations for appropriate actions to avoid future occurrences.

Our goal is to continually engage with customers to understand their needs and concerns. This is a material ESG topic ranked highly by our stakeholders, and vital to ensuring this is our annual customer satisfaction survey. In 2020, we posted an average rating of 4 out of 5 for our SP division on both product quality and the quality of packaging for products supplied, and we look forward to improving this rating.

Our business units are certified according to the ISO9001 Standard to guarantee that our products meet the needs of our customers while aligning with statutory and regulatory requirements:

- New Toyo Aluminium Paper Product Co., Pte Ltd: ISO9001 (2015)
- Paper Base Converting Sdn Bhd: ISO9001 (2015)
- New Toyo (Vietnam) Aluminium Paper Packaging Co., Ltd: ISO9001 (2015)

WE MAINTAINED OUR 'GOOD' PERFORMANCE RATING IN YEAR 2020.

# OUR PEOPLE

At New Toyo, we believe the success of our organisation is a result of our employees' performance. To enhance employee satisfaction and effectiveness, we encourage and foster a culture of inclusiveness and self-improvement throughout the organisation, and offer customised training and development opportunities to all our employees.

## Our Employees

Our workforce comprised 452 members within our SP division at the end of 2020. This represented numbers of male and female employees at 359 and 93 respectively in our workforce. Most of these employees are assigned to the production factory floor and are engaged in physical work. Consequently, the company attracts a majority of male employees as is often the case in the manufacturing industry. (see Figure 1.1)

All workers are full-time employees, aside from three part-time female staff. 24.8% are engaged for fixed-term or temporary contracts ranging one and three years. 37.1% of our workforce in Malaysia and 100% of our workforce in Vietnam are engaged through collective bargaining agreements. Following our interest to safeguard worker rights, we adopt the SA8000 Standard at our Vietnam operations. This Standard highlights our aim to develop, maintain and apply socially acceptable practices in the workplace.

Total Employees by Employment Contract and Gender in 2020 (Figure 1.1)

	 Male	 Female	 Singapore	 Malaysia	 Vietnam	 Dubai
<b>PERMANENT</b>	<b>265</b> (2019: 237)	<b>75</b> (2019: 78)	<b>74</b> (2019: 80)	<b>116</b> (2019: 112)	<b>150</b> (2019: 123)	<b>-</b> (2019: -)
<b>FIXED-TERM/ TEMPORARY EMPLOYEES</b> <small>(Fixed-term refers to contract-based; eg. 1 to 3 years contract)</small>	<b>94</b> (2019: 159)	<b>18</b> (2019: 28)	<b>1</b> (2019: -)	<b>35</b> (2019: 36)	<b>56</b> (2019: 134)	<b>20</b> (2019: 17)

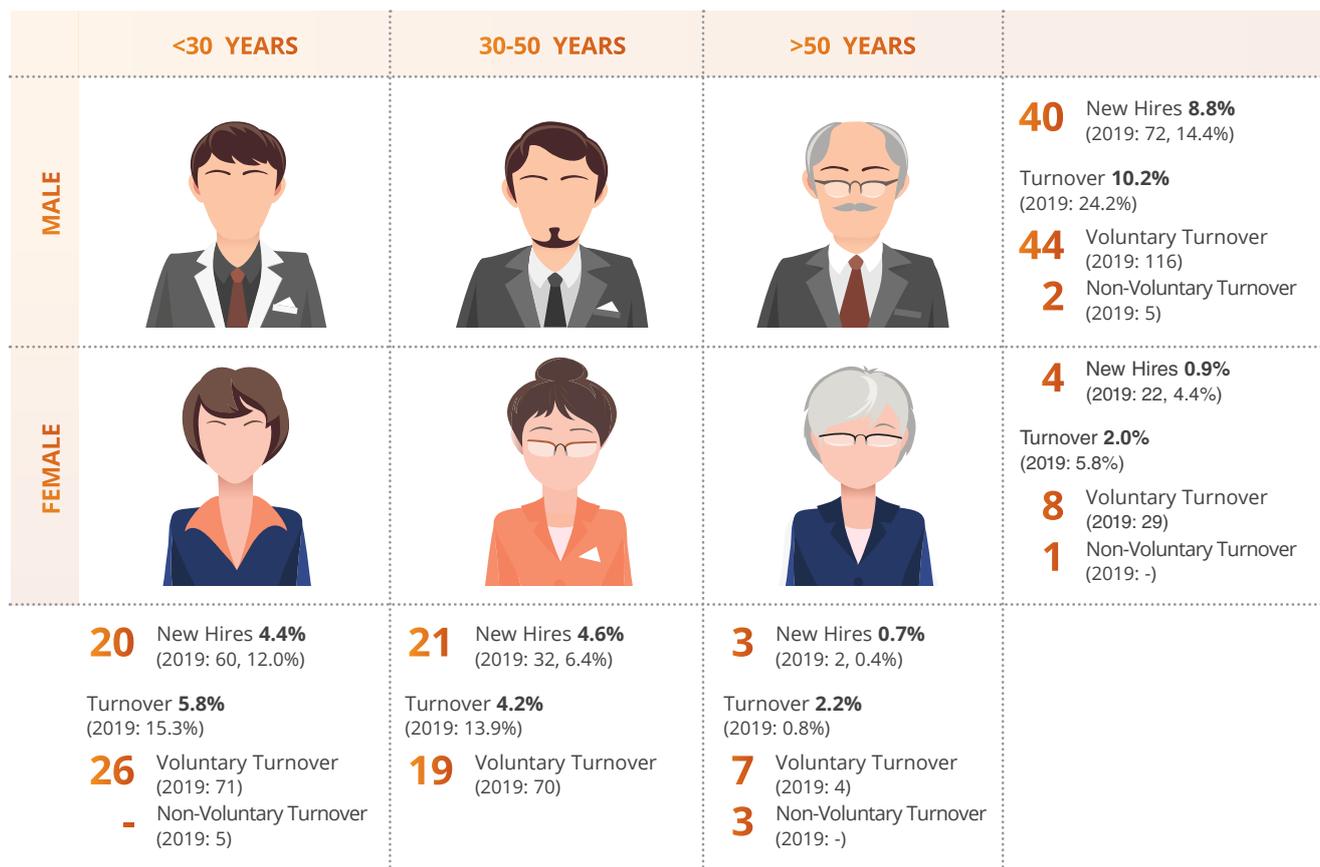
## Employee Attrition and New Hire Rates

Remuneration and career progression opportunities are pegged at competitive rates in order to attract and retain our valued staff. In 2020, employee turnovers and new hires were at 12.2% and 9.7% respectively. The employee turnover rate decreased in year 2020 due to the group's restructuring exercise which provided upticks in production efficiency.

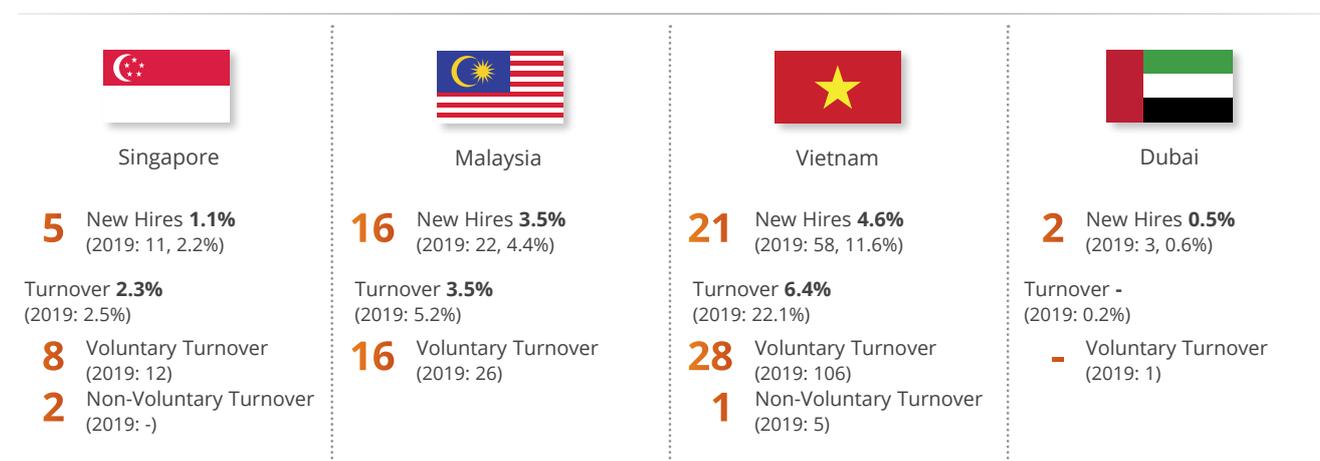
# OUR PEOPLE

Overall employee turnover rate decreased by 17.8% in year 2020 (in 2019: 30.0%). This was mainly due to operations stabilising subsequent to the restructuring in the prior year (see Figure 1.3), and the turnover was largely from Vietnam as a result of cessation of our core paper business operations in the 4th quarter of 2019.

Total Employee Hires and Employee Turnover<sup>4</sup> by Age Group and Gender (Figure 1.2)



Rate of New Hires and Employee Turnover<sup>4</sup> by Region (Figure 1.3)



<sup>4</sup> New hire and turnover rate by gender and region are both based on total new hire and employee turnover figures in the SP division.

# OUR PEOPLE

## Diversity and Equal Opportunity

At New Toyo, we establish a work environment that is inclusive and respectful of each employee, and we do not discriminate based on age, gender, ethnicity, nationality or sexual orientation. We evaluate the performance of newly hired and present employees in terms of merit, qualifications and work performance. The feedback, suggestions and concerns of our employees are highly valued and taken regardless of each employee's position as we strive to create a workplace that enables and promotes diversity of talent.

Our business resilience is strengthened by monitoring and responding appropriately to changes in the composition of our supply chain. This is only made possible by maintaining a diverse pool of talents who feel empowered to contribute their input safely and with comfort and dignity. Emphasising diversity and inclusion fosters stronger relationships with our customers as we understand and consider their priorities in terms of differing social, ethnic and geographical backgrounds.

WE CONTINUE TO MAINTAIN THE BALANCE BETWEEN  
GENDER AND AGE IN YEAR 2020.

## Anti-Discrimination and Harassment-Free Environment

New Toyo upholds a workplace culture of mutual cooperation where each worker is given due respect. Absence of discrimination, including all forms of abuse or harassment, is prioritised and stringent measures are in place to prevent and settle any incident should it arise. This includes discrimination based on age, ancestry, marital status, national origin, race, religion, gender or veteran status, among others. Harassment is considered as abusive, insulting or offensive behaviour, such as sexual advances, speech with sexual comments and attempted procurement of sexual favours.

## Grievance Mechanism

In the event that an employee experiences or witnesses any form of discrimination or harassment, he or she may immediately approach our Group Legal department, and the reporting party is guaranteed absolute confidentiality. Our managers undertake timely submission of any incident and will promptly inform the company's senior management or our Human Resources department in the event that an incident of harassment or discrimination occurs. The relevant policies are provided for in the Employee Handbook Recruitment Policy and Guidelines on Selection and Hiring. Human Resources evaluate hiring processes to ensure discrimination is avoided and maintains statistical data that is provided to the Group HR Admin Manager quarterly. No reported incidents of discrimination occurred during 2020.

WE MAINTAINED ZERO DISCRIMINATION INCIDENTS  
FOR YEAR 2020.

## Open Communication

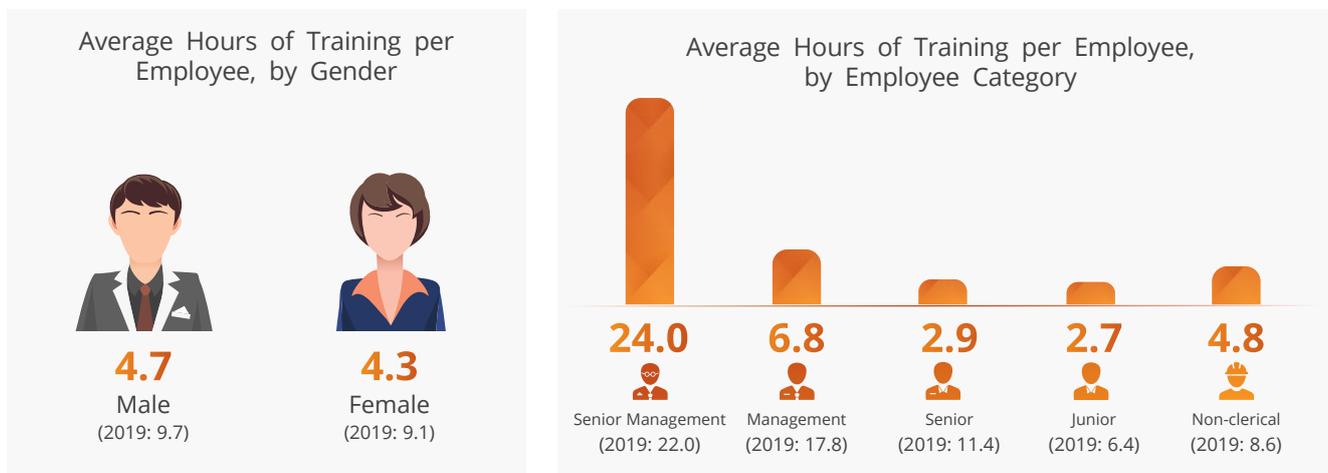
To ensure a feedback loop between employees and their reporting officers, we established a performance evaluation system which provided an avenue for open dialogue. As a result, we are able to provide recognition and incentives that commensurate with employee contributions, and encourage our employees to improve themselves through a customised training and development programme.

## Training and Development

At New Toyo, we believe in the importance of lifelong learning. We provide ample opportunities for our employees to grow professionally through skills upgrading and training. External and in-house career training programmes provide a means for our employees to excel in their roles and achieve their highest potential. Financial assistance is provided, which include subsidies for external courses should workers choose to pursue opportunities to further enhance their skillsets.

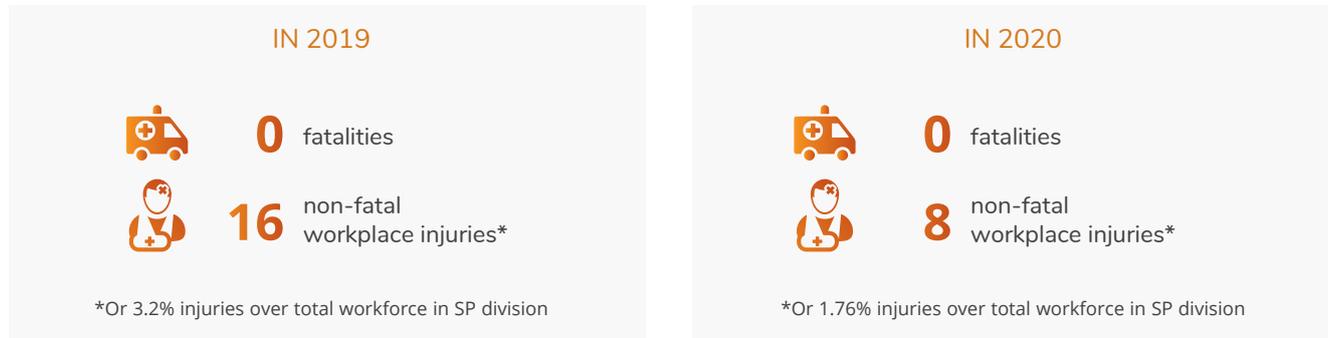
Where possible, we promote employees from within the organisation as and when individuals demonstrate the potential, drive and skills to fill emerging positions instead of recruiting externally. Our appraisal and profiling process enables us to identify the best candidates to take on leadership roles within the organisation. Human capital development continues to be a priority as we continue working on our growth strategies and capitalise on opportunities.

Average hours of Training by Gender and Employee Category in 2020 (Figure 1.4)



# OUR PEOPLE

## OCCUPATIONAL HEALTH AND SAFETY



We have revised our disclosures to begin aligning with the new GRI 403: Occupational Health and Safety 2018 Standard. It is important that we achieve this alignment as the health and safety of our employees are fundamental principles at the top of our agenda. Here at New Toyo, we are committed to make health and safety an integral part of our culture, and we have strict health and safety policies and systems in place to help us achieve that.

We have a robust risk management system that allows us to systematically identify, analyse, evaluate and treat different types of risk. This year, in line with the updated GRI standards, we have enhanced our system to include the identification of hazards and the assessment of risks, as well as the mitigative measures that are in place to eliminate hazards and minimise risks. Please refer to the Risk Management section on page 11 of the report for further information.

As our workforce is exposed to certain risks while operating in the factory setting, we continuously review and develop strict operating procedures to anticipate and prevent potential safety risks before, during, and after operations. Employees are required to observe and follow all safety and environmental regulations outlined, including those detailing the use of necessary safety equipment where relevant. We also have stringent requirements for reporting of incidents and injuries, as well as potential hazardous situations, which are then systematically investigated and reported on.

We recognise that it is our responsibility and duty to provide a safe and accident-free work environment for all our employees. While we acknowledge that no workplace risk, such as cuts, bruises and sprains, may be fully prevented, we make it our top priority to introduce precautionary measures to prevent, anticipate and reduce workplace accidents.

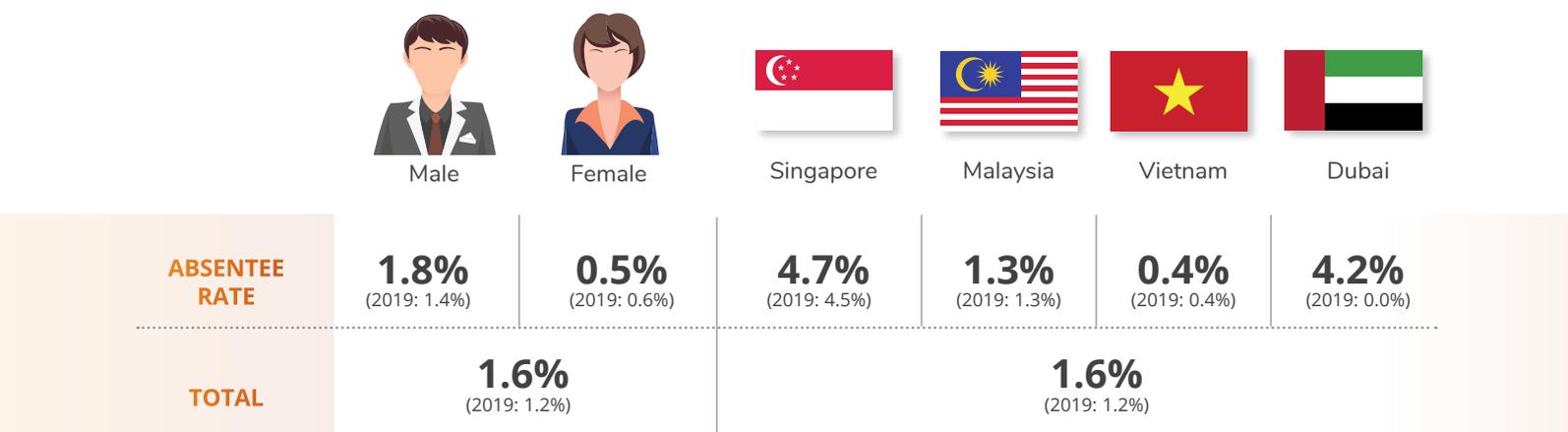
We also acknowledge the need to shift our focus from safety-only, towards equal emphasis on safety, health and well-being. Safety protocol refresher courses are mandatory and help to ingrain a culture of safety in our workplaces across our various operating regions. In addition, we provide necessary healthcare benefits to all employees such as annual medical check-ups.

Our low absentee rates speak volumes of our resolute commitment to ensure the highest standards and safety within the organisation.

Our absentee rate for FY2020 remained low as we prioritise a healthy lifestyle among our employees through promoting and providing relevant information on the importance of healthy living. Workplace safety training is regularly conducted for our employees upon joining and thereafter. This led to no work-related fatalities reported for FY2020.

# OUR PEOPLE

Absentee Rates by Region and Gender (Figure 1.5)



Injury Rates by Region and Year (Figure 1.6)



System of rules applied in recording and reporting accident statistics:

*(Additional information: We do not have other workers besides employees.)*

1. For 2020, we tracked Occupational Health and Safety performance in accordance with the metric prescribed by Singapore's Ministry of Manpower, in line with industry practice. 2019 rates are presented using the same per metrics for the purpose of comparison against 2020 rates.
2. Accident statistics are recorded and reported according to the Ministry of Manpower, the Occupational Safety and Health Malaysia and the Hazard Analysis and Critical Control Points of Singapore, Malaysia and Vietnam respectively. As such, aggregation is not meaningful.
3. Minor injuries are excluded in 'non-fatal workplace injuries' for all regions except Malaysia.

# ENVIRONMENT

“ We endeavour to be responsible stewards of the environment and are committed to adhere to and comply with all applicable laws and regulations related to environmental issues. ”

We believe every organisation has a fundamental obligation and responsibility towards environmental stewardship. The importance of environmental matters and their impact cannot be underestimated. We meticulously and diligently ensure we adhere to all environmental laws and regulations. As a commitment towards long-term sustainability, we actively obtain feedback from our key stakeholders to reduce the environmental impact of our activities.

Zero incidents of non-compliance with environmental laws and regulations, including incidents related to air toxins, effluents and waste were noted this year. Our goal is to maintain this admirable performance into the future as we further develop our businesses.

Our machines operate by utilising more electricity when switching from a disconnected to a running mode. Consequently, we align our manufacturing cycles efficiently to keep unnecessary starts and stops to a minimum. Maintaining the machines on schedule enables us to keep them running optimally while reducing the likelihood of a breakdown, thus contributing to a lower carbon footprint. Additionally, we advise our customers to use water-based inks as they are more environmentally friendly.

Our environmental policies and programmes are regularly upgraded to ensure their relevance and importance.

WE ALWAYS DO OUR BEST TO BE A RESPONSIBLE MANUFACTURER THAT CARES FOR ENVIRONMENTAL ISSUES BY EMBRACING GREEN PRACTICES.

In year 2018, we devised a set of KPIs for all relevant business units, encompassing key areas such as materials utilisation, work scheduling, machine upkeep and staffing to ensure a high level of efficiency is maintained. These KPIs are closely monitored to ensure the standards of efficiency we are known for is maintained and improved on.

For our annual sustainability report, we have opted for the eco-friendly option of e-distribution. Copies of this report and future sustainability reports can be downloaded from our website at: <http://www.newtoyo.com/investannualreport.htm>.

ENVIRONMENTAL COMPLIANCE TRACK RECORD  
The result remains the same with Zero incidents reported.

## Water

Water scarcity is a complex issue that affects every continent, including tropical regions such as Malaysia, Dubai and Singapore, where we base our operations in. With the impact of a rising global population compounded by natural disasters brought about by climate change, an increasing number of regions are reaching the limit where water services can be delivered at a sustainable level. Though water is not identified as a material topic for New Toyo's operations as our water use is not as intensive as that of other heavy industries, we acknowledge the importance of better stewardship of water resources, and strive to understand our impact on both the environment and the local communities. For this year, we have updated our disclosures to be aligned with the new GRI 303: Water and Effluents 2018 Standard. This allows us to properly assess the impact of our use of water resource across the whole product supply chain, particularly in water-stressed regions.

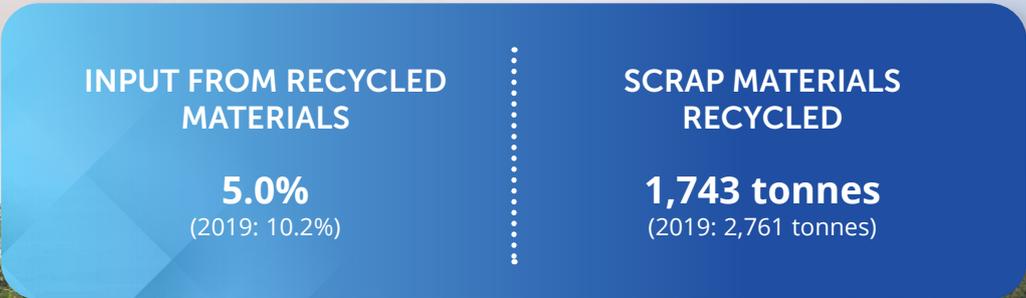
Water is supplied by municipal water sources for all our operations. The total volume of water used in 2020 decreased to 21.2 mega litres, down from 29.4 mega litres in 2019. This was mainly due to efficiencies in water usage associated with production activities in Vietnam.

## Materials

Our products are manufactured using pre-processed raw materials that do not require our own processing of paper pulp. At the same time, we recognise that the production of paper materials does leave an environmental footprint that may impact local communities. We therefore implement an appropriate resource conservation plan to alleviate this.

As we are a responsible and dedicated company, we steadfastly adhere to the mottos of Our Approach and Our Sustainability Ethos and actively seek to limit our impact on the environment through effective planning and excellent product delivery. Our products remain of the highest quality, even as we commit to a responsible use of materials in our operations. Keeping the number of rejects low (both internally and externally), provides a direct impact on material, energy, labour and transportation costs involved in replacing faulty products. These measures allow us to minimise wastage and attain an optimal level of operational efficiency that enhances value for our customers, shareholders and the environment.

One of our strategies to reduce environmental impact is the use of recycled paper cores to package our materials wherever possible. For the present year, 5.0% (2019: 10.2%) of input materials were paper cores made from recycled materials. For our operations, resulting materials of recyclable quality amounted to 1,743 metric tonnes (2019: 2,761 metric tonnes) of scrap materials sent for processing during 2020.



# ENVIRONMENT

## Energy and Greenhouse Gas Emissions

Setting the bar high on limits to energy consumption and reduction of greenhouse gas emissions give us an opportunity to increase operational efficiency, while also being environmentally friendly as we find means to enhance energy efficiency and the use of renewable fuel sources. This contributes to global efforts in reducing the effects of climate change. Our sustainability reports provide access to our headline figures and trend data as we continue to monitor and reduce our carbon footprint.

New Toyo's internal Energy Conservation Policy and Procedure, published since 2011, is obligatory reading for all headquartered employees as it provides a guide on ways our employees can promote energy conservation. The guidelines include measures such as setting air conditioning systems to 24°C, keeping doors closed, turning off lights and enabling the power management features of personal computers, as well as other means to reduce energy consumption where feasible. Following this guide, our employees can show their support for our initiative to improve our energy and emissions profile.

Our supply, manufacturing and distribution processes are closely monitored and kept at an optimal level in order to control our carbon footprint. For instance, we ensure containers are fully loaded to their ideal safe capacity wherever possible. Our energy intensity for 2020 was 472 kilojoules per dollar revenue. We endeavour to maintain our future energy usage within a reasonable range.

Our energy intensity calculations include fuel<sup>5</sup> and electricity consumed in our factories, with electricity consumption counted by our electricity billing. We source fuel in diesel form and biomass (from compressed wood tablets), which is considered an environmentally friendly form of energy.

Where possible, we promote the use of energy efficient products.

### ENERGY INTENSITY

**472 kilojoules**

(2019: 425 kilojoules)

<sup>5</sup> Fuel properties are sourced from Greenhouse Gas (GHG) Protocol's Emission Factors from Cross Sector Tools (March 2017 version)

“ By supporting and maintaining our commitment to local neighbourhoods, we build a valued reputation in the regions we operate. Over the years, we have given back to our communities through various initiatives, such as donations, involvement in social work and other community services. ”

## Charitable Donations and Sponsorship

We acknowledge the role that our communities play in our success as an organisation, and we give back to our communities accordingly. We sponsor charitable activities and committed pledges to non-profit organisations devoted to supporting community well-being. Our Sponsorship and Corporate Donation Policy guides us as we establish priorities and rationales for sponsorships and corporate donations. Non-profits focusing on education, community development, environmental improvement, humanitarian and social projects, and economic development rank foremost when receiving our support.

The following requirements are in place for a non-profit organisation to participate:

- be recognised as a charity or non-profit organisation and have a charter to that effect;
- be tax exempt;
- have administrative fees of less than 20% of overall expenses; and
- ensure that our support will improve the quality of life in the community.

We will not consider the provision of funding for the following types of requests:

- organisations without a non-profit status;
- political organisations, candidates or campaigns;
- lobbying groups;
- sponsorships/donations for individual purposes; and
- solicitations that discriminate on the basis of age, race, gender, sexual orientation or national origin.

## Our Community Engagement

We have been making several donations since year 2017 to various non-profit organisations and local communities such as National Heart Centre Singapore, Vietnam Red Cross Society, and Xiamen Haicang District Education Foundation in our efforts to better society.



# RESPONSIBLE SOURCING

“ As a responsible business partner, we ensure our suppliers formally agree and adhere to our Supplier’s Code of Conduct as it forms a core principle to guarantee we conduct business with appropriate contacts. ”

Our major customers have taken measured steps to embrace sustainability and become leaders of sustainability. With sustainability gaining priority by our customers, our goal is to meet their high standards using appropriate procurement from a social and environmental perspective. New Toyo’s Supplier CoC provides guidance in important areas such as ethics in business dealings, adherence to applicable laws and regulations, and environmental stewardship, and we welcome our suppliers to embed these measures in their business operations.

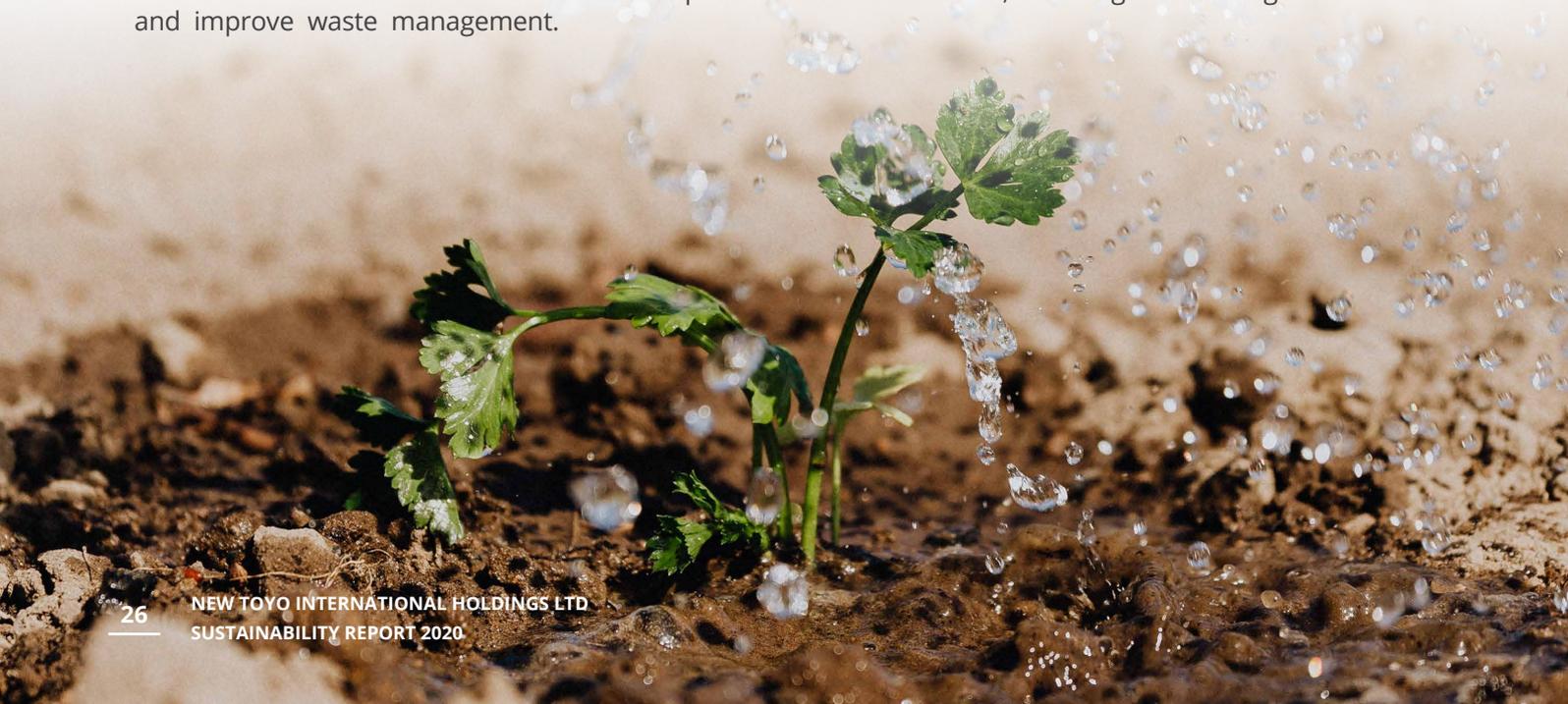
## Ethics in Business Dealings

Ethical business dealings are fundamental to the long-term success of a business. We depend on our suppliers to embed measures and mechanisms within their organisation which serve to prevent conflicts of interest, excessive gifts and entertainment, bribery and corruption. The company’s established code of conduct includes items related to ethical conduct, including conflicts of interest within or beyond the Group. It also provides policies on the acceptance of gifts, hospitality or other favours that all our employees pledge to abide by and strictly adhere to.

Finally, to maintain trust in our business relationships, we pledge to always act with integrity, and actively seek to promote a transparent and fair business environment in all the regions we operate in.

## Environment

At New Toyo, environmental matters are regarded with the same importance as all other business concerns. All suppliers are required to be responsible stewards of the environment and emphatically follow all applicable environmental laws and regulations. We encourage our suppliers to proactively source for new methods to limit the consumption of natural resources, reduce greenhouse gas emissions and improve waste management.



# GRI CONTENT INDEX

GRI Standard (2016) Title	Disclosure Number	Disclosure Title	Page No.
General Disclosures	102-1	Name of the organisation	About New Toyo, p. 2
	102-2	Activities, brands, products and services	About New Toyo, p. 2
	102-3	Location of headquarters	About New Toyo, p. 2
	102-4	Location of operations	About New Toyo, p. 2
	102-5	Ownership and legal form	About New Toyo, p. 2
	102-6	Markets served	About New Toyo, p. 2
	102-7	Scale of the organisation	About New Toyo, p. 2  Annual report > Statements of Financial Position, Consolidated Income Statement  Quantity of products has not been disclosed as this information is trade sensitive.
	102-8	Information on employees and other workers	Our Employees, p. 16  Data have been obtained using HR personnel files.
	102-9	Supply chain	Our Sustainability Ethos, p. 3
	102-10	Significant changes to the organisation and its supply chain	Annual report > Chairman's Message, Group CEO's Business Review
	102-11	Precautionary Principle or approach	Risk Management, p. 11
	102-12	External initiatives	Customer Satisfaction, p. 15 Environment, p. 22
	102-13	Membership of associations	Not applicable
	102-14	Statement from senior decision-maker	Message from Board of Directors, p. 1
	102-16	Values, principles, standards and norms of behaviour	Governance, Risk Management, Ethical Standards, p. 10-12
	102-18	Governance structure	Governance, p. 10-11
	102-40	List of stakeholder groups	Stakeholder Engagement, p. 13
	102-41	Collective bargaining agreements	Our Employees, p. 16 More information will be available in future reports.
	102-42	Identifying and selecting stakeholders	Stakeholder Engagement, p. 13
	102-43	Approach to stakeholder engagement	Stakeholder Engagement, p. 13
	102-44	Key topics and concerns raised	Stakeholder Engagement, p. 13
	102-45	Entities included in the consolidated financial statements	Annual Report > Notes to the Financial Statements About This Report, p. 6
	102-46	Defining report content and topic Boundaries	Materiality, p. 14
	102-47	List of material topics	Materiality, p. 14
	102-48	Restatements of information	Not applicable
	102-49	Changes in reporting	Not applicable

# GRI CONTENT INDEX

GRI Standard (2016) Title	Disclosure Number	Disclosure Title	Page No.
General Disclosures	102-50	Reporting period	About This Report, p. 6
	102-51	Date of most recent report	Not applicable
	102-52	Reporting cycle	About This Report, p. 6
	102-53	Contact point for questions regarding the report	About This Report, p. 6
	102-54	Reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option.  See also: About This Report, p.6
	102-55	GRI content index	GRI Content Index, p. 27-30
	102-56	External assurance	About This Report, p. 6
<b>Material Topics</b>			
<b>Anti-competitive Behaviour</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Ethical Standards, p. 12
	103-2	The management approach and its components	Ethical Standards, p. 12
	103-3	Evaluation of the management approach	Annual Report > Corporate Governance Statement: Risk Management and Internal Controls
Anti-Competitive Behaviour	206-1	Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	Ethical Standards, p. 12
<b>Materials</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Materials, p. 23
	103-2	The management approach and its components	Materials, p. 23
	103-3	Evaluation of the management approach	Environment, p. 22
Materials	301-2	Recycled input materials used	Materials, p. 23
<b>Energy</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Energy and Greenhouse Gas Emissions, p. 24
	103-2	The management approach and its components	Energy and Greenhouse Gas Emissions, p. 24
	103-3	Evaluation of the management approach	Environment, p. 22
Energy	302-3	Energy intensity	Energy and Greenhouse Gas Emissions, p. 24

# GRI CONTENT INDEX

GRI Standard (2016) Title	Disclosure Number	Disclosure Title	Page No.
<b>Water</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Water, p. 23
	103-2	The management approach and its components	Water, p. 23
	103-3	Evaluation of the management approach	Environment, p. 22
Water	303-3	Water withdrawal by source	Water, p. 23
<b>Environmental Compliance</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Ethical Standards, p. 12 Environment, p. 22
	103-2	The management approach and its components	Risk Management, p. 11 Environment, p. 22
	103-3	Evaluation of the management approach	Annual Report > Corporate Governance Statement: Risk Management and Internal Controls
Environmental Compliance	307-1	Non-compliance with environmental laws and regulations	Environment, p. 22
<b>Employment</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Our People, p. 16
	103-2	The management approach and its components	Our Employees, p. 16-21
	103-3	Evaluation of the management approach	Employee Attrition and New Hire Rates, p. 16-17
Employment	401-1	New employee hires and employee turnover	Employee Attrition and New Hire Rates, p. 16-17
<b>Occupational Health and Safety</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Occupational Health & Safety, p. 20-21
	103-2	The management approach and its components	Occupational Health & Safety, p. 20-21
	103-3	Evaluation of the management approach	Occupational Health & Safety, p. 20-21
Occupational Health and Safety	403-2	Types of injury and rates of injury, absenteeism and number of work-related fatalities	Occupational Health & Safety, p. 20-21
	403-9	Hazard identification, risk assessment and incident investigation	Accident Severity Rate and Accident Frequency Rate are omitted from disclosure as NTH's manufacturing facility is significantly smaller than other manufacturers in the benchmarking group; hence, with a small base, any injury is highly significant.

# GRI CONTENT INDEX

GRI Standard (2016) Title	Disclosure Number	Disclosure Title	Page No.
<b>Training and Education</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Our People, p. 16-21
	103-2	The management approach and its components	Training and Development, p. 19
	103-3	Evaluation of the management approach	Training and Development, p. 19
Training and Education	404-1	Average hours of training per year per employee	Training and Development, p. 19
<b>Non-discrimination</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Diversity and Inclusion, p. 18 Anti-Discrimination and Harassment-Free Environment, p. 18
	103-2	The management approach and its components	Anti-Discrimination and Harassment-Free Environment, p. 18
	103-3	Evaluation of the management approach	Anti-Discrimination and Harassment-Free Environment, p. 18
Non-discrimination	406-1	Incidents of discrimination and corrective actions taken	Anti-Discrimination and Harassment-Free Environment, p. 18
<b>Customer Privacy</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Ethical Standards, p. 12
	103-2	The management approach and its components	Ethical Standards, p. 12
	103-3	Evaluation of the management approach	Annual Report > Corporate Governance Statement: Risk Management and Internal Controls
Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Ethical Standards, p. 12
<b>Socioeconomic Compliance</b>			
Management Approach	103-1	Explanation of the material topic and its Boundary	Ethical Standards, p. 12
	103-2	The management approach and its components	Ethical Standards, p. 12
	103-3	Evaluation of the management approach	Annual Report > Corporate Governance Statement: Risk Management and Internal Controls
Socioeconomic Compliance	419-1	Non-compliance with laws and regulations in the social and economic area	Ethical Standards, p. 12

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