S	EC R	egist	ratior	Nun	nber					
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Secondary License Type if Applicable

COMPANY NAME

М	Α	в	U	Н	Α	Y	Н	0	L	D	I	Ν	G	S	С	0	R	Ρ	0	R	Α	Т	I	0	Ν	

PRINCIPAL OFFICE (No./Street/Barangay/City/Town/Province)

Form Type

3	5	Т	н		F	L	0	0	R															
R	U	F	I	N	0		Ρ	A	С	I	F	I	С		Т	0	W	Ε	R					
6	7	8	4		Α	Y	Α	L	Α		Α	V	Ε	Ν	U	Ε								
М	Α	κ	Α	Т	I		С	I	Т	Y														

Department requiring the report

r onn rype	Department requiring the report	becondary Election Type, il Applicat	
	2019 SUSTAINABILITY REPO	RT	
	COMPANY INFORMATION		
Company's Email Address	Company's Telephone Number/s	Mobile Number	
mabuhayholdings@yahoo.com	750-2000		
No. of Stockholders	Annual Meeting (Month/Day)	Fiscal Year (Month/Day)	
-	CONTACT PERSON INFORMATION	-	
Name of Contact Person	Email Address	Telephone Number/s Mobile Nu	umber
GLORIA GEORGIA G. GARCI	A ggg.mhc@gmail.com	750-2000	
	CONTACT PERSON's ADDRES	S	

35th Floor, Rufino Pacific Tower, 6784 Ayala Avenue, Makati City

Note 1: In case of death, resignation or cessation of office of the officer designated as contact person, such incident shall be reported to the Commission within thirty (30) calendar days from the occurrence thereof with information and complete contact details of the new contact person designated.

Note 2: All boxes must be properly and completely filled-up. Failure to do so shall cause the delay in updating the corporation's records with the Commission and/or non-receipt of Notice of Deficiencies. Further, non-receipt of Notice of Deficiencies shall not excuse the corporation from liability for its deficiencies.



Sustainability Report

Contextual Information

Company Details	
Name of Organization	Mabuhay Holdings Corporation
Location of Headquarters	35th Floor, Rufino Pacific Tower, 6784 Ayala Avenue, Makati City 1223
Location of Operations	35th Floor, Rufino Pacific Tower, 6784 Ayala Avenue, Makati City 1223
Report Boundary: Legal entities (e.g. subsidiaries) included in this report*	Parent and Subsidiaries
Business Model, including Primary Activities, Brands, Products, and Services	Holding Company
Reporting Period	December 31, 2019
Highest Ranking Person responsible for this report	Esteban G. Peña Sy, President

Materiality Process

Mabuhay Holdings Corporation as a holding company regularly reviews our processes taking into consideration our current lean organization. With our size, structure, risk profile and nature of operations, we are committed to minimizing our negative impact to the economy, the environment and the society by enhancing our operations to align with the frameworks on sustainability.

In general, materiality shall be determined based on the following elements:

- Significant economic, environmental, and social impacts of the organization;
- Information that substantively influence the assessments and decisions of stakeholders, including investors;
- Matters that substantively affect the organization's ability to create value over the short, medium and long term.

Materiality Assessment Process

Our assessment process shall adopt the following steps:

Step 1 - Objective and Scope

The objective shall include the identification of relevant sustainability disclosures to allow stakeholders to make decisions based on these disclosures.

Step 2 - Identification and Categorization of Sustainability Issues

Sustainability issues shall be taken from board committee reports, risk management assessments, management meetings, government regulations, international standards, stakeholder feedback and complaints, media review, and external peer review.

Step 3 - Stakeholder Engagement

Stakeholders shall be engaged to enable the Company to have a grasp on the sustainability threats and opportunities that the Company may not be aware of.

Step 4 - Prioritization

Prioritization of disclosures that will be reported shall be based on the impact of such disclosure to the stakeholders and the capacity of the stakeholders to influence the Company regarding such disclosure.

Step 5 - Process and Review

The top management shall review and approve the disclosures that will be reported by the Company to ensure integrity and credibility.

ECONOMIC

Economic Performance

Direct Economic Value Generated and Distributed

Disclosure	Amount	Units
Direct economic value generated (revenue)	80,207,974	PhP
Direct economic value distributed:		
a. Operating costs	242,375,985	PhP
b. Employee wages and benefits	8,295,824	PhP
c. Payments to suppliers, other operating costs	6,040,754	Php
d. Dividends given to stockholders and interest payments to loan providers	0	PhP
e. Taxes given to government	1,480,888	PhP
f. Investments to community (e.g. donations, CSR)	10,000	PhP

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach				
Not applicable	1 5 0	ompany, taking into account the size, ture of operations, provides negligible impact				
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach				
Not applicable		ompany, taking into account the size, ture of operations, provides negligible impact				
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach				
Not applicable	The Company as a holding company, taking into account the siz structure, risk profile and nature of operations, provides negligib to economy.					

Governance	Strategy	Risk Management	Metrics and Targets
Disclose the organization's governance around climate-related risks and opportunities	Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material	Disclose how the organization identifies, assesses, and manages climate-related risks	Disclose the metrics and targets used to assess and manage relevant climate- related risks and opportunities where such information is material
Recommended Disclosures	3		
a) Describe the board's oversight of climate- related risks and opportunities	a) Describe the climate- related risks and opportunities the organization has identified over the short, medium and long term	a) Describe the organization's processes for identifying and assessing climate- related risks	a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process
The Company's Manual on Corporate Governance states: The Company should be socially responsible in all its dealings with the communities where it operates. It shall ensure that its interaction serve its environment and stakeholders in a positive and progressive manner that is fully supportive of Its comprehensive and balanced development. The Company shall recognize and place an importance on the Interdependence between business and society, and promote a mutually beneficial relationship, that allows the company to grow its business while contributing to the advancement of the society where it operates.	The increased awareness and studies on climate change have affected our considerations on business models and opportunities in the pipeline. We understand the changing paradigms and we take these into serious account in strategizing and financial planning matters.	The Company adopted the following measures to manage climate related risks: a. Climate risk management is an integral part of the project cycle. b. Continuous enhancement of board/ management/ employee competencies on climate related initiatives and actively developing climate risk management activities.	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, any project we intend to pursue in the short, medium and long- term periods will also include our sustainability efforts.
b) Describe management's role in assessing and managing climate- related risks and opportunities	b) Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy and financial planning.	b) Describe the organization's processes for managing climate- related risks	b) Describe the targets used by the organization to manage climate- related risks and opportunities and performance against targets

The Company's Manual on Corporate Governance states: The Company should be socially responsible in all its dealings with the communities where it operates. It shall ensure that its interaction serve its environment and stakeholders in a positive and progressive manner that is fully supportive of Its comprehensive and balanced development. The Company shall recognize and place an importance on the Interdependence between business and society, and promote a mutually beneficial relationship, that allows the company to grow its business while contributing to the advancement of the society where it operates.	The Company's increased awareness on matters related to climate change has an impact on our future business ventures for which we take account and consider.	We adopted measures to manage climate related risks: a. Climate risk management is included as an integral part of the project cycle which includes climate risk screening at the early stage. b.Continuously enhancing competencies of the board, management and employees and developing climate risk management activities within the organization.	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, any project we intend to pursue in the short, medium and long- term periods will also include our sustainability efforts.
	c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios including a 2°C or lower scenario	c) Describe how processes for identifying, assessing, and managing climate- related risks are integrated into the organization's overall risk management	
	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, any project we intend to pursue in the short, medium and long- term periods will also include our sustainability efforts. We cannot categorically indicate the degree of resilience our strategies. We are committed to climate related matters and seriously considers these issues.	On any project we are considering, it is important to us to anticipate future trends.	

Procurement Practices

Proportion of spending on local suppliers

Disclosure			Quantity	Units		
Percentage of procurement budget used operations that is spent on local supplie			100	%		
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Ma	nagement Approach			
Not applicable	The Company as a holding company, taking into account the siz structure, risk profile and nature of operations, provides negligit to economy.					
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach				
Not applicable	The Company as a holding co structure, risk profile and nat to economy.	-				
What are the Opportunity/ies Identified?	Which stakeholders are affected?Management Approach					
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, provides negligible imp to economy.					

Anti-corruption

Training on Anti-corruption Policies and Procedures

Disclosure			Quantity	Units		
Percentage of employees to whom the policies and procedures have been com			100	%		
Percentage of business partners to who corruption policies and procedures hav			not applicable	%		
Percentage of directors and manageme corruption training		100	%			
Percentage of employees that have reco		100	%			
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Ma	nagement Approach			
Not applicable	The Company as a holding c structure, risk profile and nat to economy.					
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach				
Not applicable	The Company as a holding c structure, risk profile and nat to economy.					
What are the Opportunity/ies Identified?						
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, provides negligible impact to economy.					

Incidents of Corruption

Disclosure			Quantity	Units		
Number of incidents in which directors corruption	were removed or disciplined	for	0	#		
Number of incidents in which employe for corruption	es were dismissed or disciplin	ed	0	#		
Number of incidents when contracts w terminated due to incidents of corruption		#				
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?Management Approach					
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risks in terms of corruption.					
What are the Risk/s Identified?	Which stakeholders are affected?	Ma	nagement Approach			
Not applicable	The Company as a holding constructure, risk profile and nat terms of corruption.	-		· · · · · · · · · · · · · · · · · · ·		
What are the Opportunity/ies Identified?	Which stakeholders are affected?Management Approach					
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in terms of corruption.					

ENVIRONMENT

Resource Management

Energy consumption within the organization:

Disclosure	Quantity	Units
Energy consumption (renewable sources)	0	GJ
Energy consumption (gasoline)	0	GJ
Energy consumption (LPG)	0	GJ
Energy consumption (diesel)	0	GJ
Energy consumption (electricity)	0	kWh

Reduction of energy consumption

Disclosure	Quantity	Units
Energy reduction (gasoline)	N/A	GJ
Energy reduction (LPG)	N/A	GJ
Energy reduction (diesel)	N/A	GJ
Energy reduction (electricity)	N/A	kWh
Energy reduction (gasoline)	N/A	GJ

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, only consumes purchased electricity equivalent to the use of lights and office equipment like computers. We do not directly consume fuel within the organization, or by sources we own or control.		
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach		
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risks in terms of energy consumption practices.		
What are the Opportunity/ies Identified?	Which stakeholders are affected?Management Approach		
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in terms of energy consumption practices other than conserving electricity consumption in its day to day use of the lights and computers.		

Water consumption within the organization

Disclosure			Quantity	Units
Water withdrawal	Water withdrawal		N/A	Cubic meters
Water consumption			N/A	Cubic meters
Water recycled and reused			N/A	Cubic meters
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Man	nagement Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in terms of water consumption. Water consumption within the organization are mainly for general cleaning of office premises.			impact in
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risks in terms of water consumption.			
What are the Opportunity/ies Identified?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in terms of water consumption.			

Materials used by the organization

Disclosure	Quantity U			Units
Materials used by weight or volume				
• renewable			0	kg/liters
• non-renewable			0	kg/liters
Percentage of recycled input materials organization's primary products and se			0	%
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.			
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.			
What are the Opportunity/ies Identified?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.			

Ecosystems and biodiversity (whether in upland/watershed or coastal/marine)

Disclosure	osure Quantity			Units
	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		None	
Habitats protected or restored			None	ha
IUCN Red List species and national co habitats in areas affected by operations			None	
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.			
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.			
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Ma	nagement Approach	

Environmental impact management

Air Emissions

<u>GHG</u>

Disclosure		Quantity	Units	
Direct (Scope 1) GHG Emissions			0	Tonnes CO ₂ e
Energy indirect (Scope 2) GHG Emissi	ons		0	Tonnes CO ₂ e
Emissions of ozone-depleting substanc	es (ODS)		0	Tonnes
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected? Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.			
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.			
What are the Opportunity/ies Identified?	Which stakeholders are Management Approach affected?			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.			

<u>Air pollutants</u>

Disclosure			Quantity	Units
NO _x			0	kg
SO _x			0	kg
Persistent organic pollutants (POPs)			0	kg
Volatile organic compounds (VOCs)			0	kg
Hazardous air pollutants (HAPs)			0	kg
Particulate matter (PM)			0	kg
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.			

What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.		
What are the Opportunity/ies Identified?	Which stakeholders are affected?Management Approach		
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.		

Solid and Hazardous Wastes

<u>Solid Waste</u>					
Disclosure			Quantity		Units
Total solid waste generated				0	kg
Reusable		0 kg		kg	
Recyclable				0	kg
Composted				0	kg
Incinerated				0	kg
Residuals/Landfilled				0	kg
What is the impact and where does it occur? What is the organization's involvement in the impact? Not applicable	Which stakeholders are affected?Management ApproachThe Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in				
	relation to this matter.		1		1
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach				
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.				
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Ma	nagement	Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.				

Hazardous Waste

Disclosure	Quantity	Units
Total weight of hazardous waste generated	0	kg
Total weight of hazardous waste transported	0	kg

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.		
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach		
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.		
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.		

Effluents

Disclosure		Quantity	Units	
Total volume of water discharges		0	Cubic meters	
Percent of wastewater recycled			0	%
What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are Man affected?		nagement Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.			
What are the Risk/s Identified?	Which stakeholders are affected?Man		nagement Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.			
What are the Opportunity/ies Identified?	Which stakeholders are affected?Management Approach			
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.			

Environmental compliance Non-compliance with Environmental Laws and Regulations

Disclosure	Quantity	Units
Total amount of monetary fines for non-compliance with environmental laws and/or regulations	0	PhP
No. of non-monetary sanctions for non-compliance with environmental laws and/or regulations	0	#
No. of cases resolved through dispute resolution mechanism	0	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.	
What are the Risk/s Identified?	Which stakeholders are affected?Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.	
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.	

SOCIAL

Employee Management

Employee Hiring and Benefits

Employee data

Disclosure	Quantity	Units
Total number of employees		
a. Number of female employees	3	#
b. Number of male employees	4	#
Attrition rate	0%	rate
Ratio of lowest paid employee against minimum wage	N/A	ratio

Employee benefits

List of Benefits	Y/N	% of female employees who availed for the year	% of male employees who availed for the year
SSS	Y	0	0
PhilHealth	Y	0	0
Pag-ibig	Y	0	0
Parental leaves	Y	0	0
Vacation leaves	Y	3	3
Sick leaves	Y	3	3
Medical benefits (aside from PhilHealth))	Y	0	0
Housing assistance (aside from Pag-ibig)	N	0	0
Retirement fund (aside from SSS)	Y	0	0
Further education support	N	0	0
Company stock options	N	0	0
Telecommuting	N	0	0
Flexible-working Hours	Y	0	0
(Others)		0	0

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.
What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.

Employee Training and Development

Disclosure	Quantity	Units
Total training hours provided to employees		
a. Female employees	0	hours
b. Male employees	0	hours
Average training hours provided to employees		
a. Female employees	0	hours/employee
b. Male employees	0	hours/employee

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.
What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.

Labor-Management Relations

Disclosure	Quantity	Units
% of employees covered with Collective Bargaining Agreements	0	%
Number of consultations conducted with employees concerning employee-related policies	0	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.
What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.

Diversity and Equal Opportunity

Disclosure	Quantity	Units
% of female workers in the workforce	43	%
% of male workers in the workforce	57	%
Number of employees from indigenous communities and/or vulnerable sector	2	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.
What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.

Workplace Conditions, Labor Standards, and Human Rights Occupational Health and Safety

Disclosure	Quantity	Units
Safe Man-Hours	Not applicable	Man-hours
No. of work-related injuries	Not applicable	#
No. of work-related fatalities	Not applicable	#
No. of work related ill-health	Not applicable	#
No. of safety drills	2	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.
What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach

Not applicable	The Company as a holding company, taking into
	account the size, structure, risk profile and nature of
	operations, has negligible opportunities in relation to
	this matter.

Labor Laws and Human Rights

Disclosure	Quantity	Units
No. of legal actions or employee grievances involving forced or child labor	0	#

Do you have policies that explicitly disallows violations of labor laws and human rights (e.g. harassment, bullying) in the workplace?

Торіс	Y/N	If Yes, cite reference in the company policy
Forced labor	N	
Child labor	N	
Human Rights	N	

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.
What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.

Supply Chain Management

Do you have a supplier accreditation policy? If yes, please attach the policy or link to the policy:

Not Applicable.

Do you consider the following sustainability topics when accrediting suppliers?

Торіс	Y/N	If Yes, cite reference in the supplier policy
Environmental performance	Ν	
Forced labor	N	

Child labor	N	
Human rights	Ν	
Bribery and corruption	N	

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.
What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.

<u>Relationship with Community</u>

Significant Impacts on Local Communities

Operations with significant (positive or negative) impacts on local communities (exclude CSR projects; this has to be business operations)	Location	Vulnerable groups (if applicable)*	Does the particular operation have impacts on indigenous people (Y/N)?	Collective or individual rights that have been identified that or particular concern for the community	Mitigating measures (if negative) or enhancement measures (if positive)
NONE	NONE	NONE	Ν	NONE	NONE

Certificates	Quantity	Units
FPIC process is still undergoing	NOT APPLICABLE	#
CP secured	NOT APPLICABLE	#

What are the Risk/s Identified?	Management Approach
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.
What are the Opportunity/ies Identified?	Management Approach

Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature o	
	operations, has negligible opportunities in relation to this matter.	

Customer Management

Customer Satisfaction

Disclosure	Score	Did a third party conduct the customer satisfaction study (Y/N)?
Customer satisfaction	None	Ν

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.	
What are the Risk/s Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.	
What are the Opportunity/ies Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.	

Health and Safety

Disclosure	Quantity	Units
No. of substantiated complaints on product or service health and safety	0	#
No. of complaints addressed	0	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.	
What are the Risk/s Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.	
What are the Opportunity/ies Identified?	Management Approach	

	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.
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Marketing and labelling

Disclosure	Quantity	Units
No. of substantiated complaints on marketing and labelling	0	#
No. of complaints addressed	0	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.	
What are the Risk/s Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.	
What are the Opportunity/ies Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.	

Customer privacy

Disclosure	Quantity	Units
No. of substantiated complaints on customer privacy	0	#
No. of complaints addressed	0	#
No. of customers, users and account holders whose information is used for secondary purposes	0	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.	
What are the Risk/s Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.	
What are the Opportunity/ies Identified?	Management Approach	

Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of
	operations, has negligible opportunities in relation to this matter.

Data Security

Disclosure	Quantity	Units
No. of data breaches, including leaks, thefts and losses of data	0	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible impact in relation to this matter.	
What are the Risk/s Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible risk in relation to this matter.	
What are the Opportunity/ies Identified?	Management Approach	
Not applicable	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible opportunities in relation to this matter.	

UN SUSTAINABLE DEVELOPMENT GOALS

Product or Service Contribution to UN SDGs

Key products and services and its contribution to sustainable development.

Key Products and	Societal Value /	Potential Negative	Management Approach to
Services	Contribution to UN SDGs	Impact of Contribution	Negative Impact
Rental of office spaces	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible societal value/ contribution to UN SDGs.	The Company as a holding company, taking into account the size, structure, risk profile and nature of operations, has negligible potential negative impact of contribution to UN SDGs.	The Company manages its day to day with a general concept of responsibility, sustainability and consciousness.