

GRI content index 2019

GRI matrix

See Annex to the Sustainability Report 2019 at www.cembra.ch/sustainability.

GRI overview

As a result of our engagement with our main stakeholders, we made some changes to the most relevant corporate responsibility themes in 2019: Firstly, we added the subject «environmental stewardship». Secondly, we framed «privacy and data protection» as a sub-aspect of «business integrity» and renamed «people and development» (formerly «personnel management and development»).

Material Topic	Description	GRI Standard
Customer orientation	Responsible products and servicesCustomer satisfaction	Additional Disclosures: Customer Orientation (Cembra Annual Report 2019 p. 32-33)
Quality and integrity of products and distribution	 Product safety Responsible treatment of customers Access to finance 	GRI 417 Marketing and Labelling
People and development	 Recruitment Education and development Work-life balance and health promotion Diversity management Corporate culture and values 	GRI 401 Employment GRI 404 Training and Education GRI 405 Diversity and Equal Opportunity
Environmental stewardship	 Environmental management of Cembra's operations, incl. energy and emissions Vehicle financing (product offering) 	GRI 302 Energy GRI 305 Emissions
Business integrity	 Compliance with laws and regulations Governance and risk management practices Ethical business conduct Privacy and data security 	GRI 205 Anti-corruption GRI 418 Customer Privacy



General Disclosures

Number	Description	Additional content, references, or reasons for omission
Organicat	ional Profile (2016)	
102-1	a. Name of the organisation.	Cembra Money Bank AG (Cembra)
102-2	a. A description of the organisation's activities.	Cembra is a leading Swiss provider of financing solutions and services. For details see Cembra AR 2019 page 5.
102-2	b. Primary brands, products, and services, including an explanation of any products or services that are banned in certain markets.	Cembra AR 2019 page 5 (Product markets) Cembra AR 2019 page 56 (Group structure and shareholders)
102-3	a. Location of the organisation's headquarters.	Cembra Money Bank AG Bändliweg 20 CH-8048 Zürich
102-4	a. Number of countries where the organisation operates, and the names of countries where it has significant operations and/or that are relevant to the topics covered in the report.	Cembra has operations in Switzerland only.
102-5	a. Nature of ownership and legal form.	Public limited company For details, see Cembra AR 2019 page 56 (Group structure and shareholders)
102-6	a. Markets served, including:i. geographic locations where products and services are offered;ii. sectors served;iii. types of customers and beneficiaries.	i. Switzerlandii. all sectors servediii. private and corporate customersFor details, see page 5 (About Cembra)
102-7	a. Scale of the organisation, including: i. total number of employees; ii. total number of operations; iii. net sales (for private sector organisations) or net revenues (for public sector organisations); iv. total capitalization (for private sector organisations) broken down in terms of debt and equity; v. quantity of products or services provided.	i. page 3 (Key figures and profile) ii. page 56 (Group Structure) iii. page 108 (Financial Report) iv. Page 110 (Financial Report) v. Page 11-17 (Product markets)
102-8 102-8 102-8 102-8 102-8	a. Total number of employees by employment contract (permanent and temporary), by gender. b. Total number of employees by employment contract (permanent and temporary), by region.	2% of all employees. Page 38 (People and development) Since Cembra operates in Switzerland only employee indicators are not broken down into regions.
102-8	c. Total number of employees by employment type (full-time and part-time), by gender. d. Whether a significant portion of the organisation's activities are performed by workers who are not employees. If applicable, a description of the nature and scale of work	Page 43 (People and development) The vast majority of workers are employees of Cembra.



	performed by workers who are not employees.	
	e. Any significant variations in the numbers	Being active in the financial sector, there are
	reported in Disclosures 102-8-a, 102-8-b, and	no seasonal variations in employee numbers
	102-8-c (such as seasonal variations in the tourism	at Cembra.
	or agricultural industries).	
	f. An explanation of how the data have been	Employment data is managed in a
	compiled, including any assumptions made.	centralised system by the Human Resources
		Department. The data reported is valid as of
		31.12.2019 including all registered
		mutations at this point of time. No
		assumptions were made
102-9	a. A description of the organisation's supply	Page 5 (About Cembra)
	chain, including its main elements as they relate to	Page 49 (Business integrity)
	the organisation's activities, primary brands,	
	products, and services.	
102-10	a. Significant changes to the organisation's size,	i. none
	structure, ownership, or supply chain, including:	ii. Cembra extended its portfolio through the
	i. Changes in the location of, or changes in,	acquisition of cashgate AG in September
	operations, including facility openings, closings,	2019
	and expansions;	iii. none
	ii. Changes in the share capital structure and other	
	capital formation, maintenance, and alteration	For details, see page 9 (Significant
	operations (for private sector organisations);	developments) and page 56 (Group Structure
	iii. Changes in the location of suppliers, the	and shareholders)
	structure of the supply chain, or relationships with	and shareholders)
	suppliers, including selection and termination.	
102-11	a. Whether and how the organisation applies the	Pages 38-44 (People and development),
	Precautionary Principle or approach.	Pages 45-46 (Environmental stewardship),
	The state of the s	Pages 47-53 (Business Integrity)
102-12	a. A list of externally-developed economic,	Principles for responsible lending in
	environmental and social charters, principles, or	Switzerland
	other initiatives to which the organisation	Marketing convention for consumer credit in
	subscribes, or which it endorses.	Switzerland
		Marketing convention for credit cards in
		Switzerland
		Energy Agency of the Swiss Private Sector
		(EnAW)
		For details see page 35 (Customer
		information), page 35 (Marketing and sales)
		and page 45 (Energy Agency)
102-13	a. A list of the main memberships of industry or	Swiss Banking Association,
	other associations, and national or international	Economisuisse
	advocacy organisations.	Konsumfinanzierung Schweiz
	.,	Leasing Association
		Digital Switzerland
<u> </u>	<u>L</u>	<u> </u>



Strategy	(2016)	
102-14	a. A statement from the most senior decision- maker of the organisation (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organisation and its strategy for addressing sustainability.	Page 28 (Letter from the Chairman)
Ethics an	nd integrity (2016)	
102-16	a. A description of the organisation's values, principles, standards, and norms of behavior.	Page 29 (Our approach to corporate responsibility) Pages 47-53 (Business Integrity)
Governar	nce (2016)	
102-18 102-18	 a. Governance structure of the organisation, including committees of the highest governance body. b. Committees responsible for decision-making on economic, environmental, and social topics. 	Page 57 (structure), pages 61-74 (Board of Directors, pages 75 -79 (Management Board) Audit and Risk Committee, Compensation and Nomination Committee, Risk and Controllership Committee, Sustainability Committee (starting in 2020)
Stakehol	der engagement (2016)	
102-40	a. A list of stakeholder groups engaged by the organisation.	Page 30 (Our approach to sustainability) The Group's most relevant stakeholders are defined as customers, employees, shareholders, business-related associations and authorities, and non-governmental organisations
102-41	a. Percentage of total employees covered by collective bargaining agreements.	There is no collective bargaining agreement in place and Cembra does not evaluate employees' membership in trade unions.
102-42	a. The basis for identifying and selecting stakeholders with whom to engage.	Cembra engaged primarily with stakeholders who are influenced by its operations or who have relevant impacts on the company.
102-43	a. The organisation's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	Page 30 (Our approach to sustainability) Page 32 (Customer orientation) Code of Conduct (Customer complaints) Page 37 (Customer complaints process) Page 6 (Annual General Meeting)
102-44	a. Key topics and concerns that have been raised through stakeholder engagement, including:i. how the organisation has responded to those key topics and concerns, including through its reporting;ii. the stakeholder groups that raised each of the key topics and concerns.	Page 31 (Our approach to sustainability) Over the past year, the topic of environmental stewardship was raised by various stakeholders in informal discussions and through different feedback channels with Cembra. As a reaction to the growing importance of this topic, Cembra has



		decided to address environmental
		management in its current report in a
		separate chapter.
		See page 30
Reporting	practice (2016)	
102-45	a. A list of all entities included in the	Page 56 (Group Structure and shareholders)
102-45	organisation's consolidated financial statements or	
	equivalent documents.	
	b. Whether any entity included in the	As the acquisition of cashgate AG was not
	organisation's consolidated financial statements or	completed before 2 September 2019, the
	equivalent documents is not covered by the report.	activities and figures of cashgate AG are not covered in the 2019 corporate responsibility report. The information provided in the Chapter "People and development" is not applicable to temporary employees and employees of Swissbilling SA. For details, see page 30 (Our approach to
		sustainability)
102-46	a. An explanation of the process for defining the	Page 29 (Our approach to sustainability)
102-46	report content and the topic Boundaries.	
	b. An explanation of how the organisation has	Page 29 (Our approach to sustainability)
	implemented the Reporting Principles for defining	
100.15	report content.	
102-47	a. A list of the material topics identified in the	Page 31 (Our approach to sustainability)
102 49	process for defining report content.	No contato con anto
102-48	a. The effect of any restatements of information given in previous reports, and the reasons for such	No restatements
	restatements.	
102-49	a. Significant changes from previous reporting periods in the list of material topics and topic Boundaries.	See page 31 (Our approach to sustainability)
102-50	a. Reporting period for the information provided.	1 January 2019 – 31 December 2019
102-51	a. If applicable, the date of the most recent	Annual Report 2018, published 21 March
10201	previous report.	2019
102-52	a. Reporting cycle.	Annual
102-53	a. The contact point for questions regarding the	Marcus Händel,
	report or its contents.	Head of Investor Relations and
		Sustainability
		investor.relations@cembra.ch
102-54	a. The claim made by the organisation, if it has prepared a report in accordance with the GRI Standards, either:i. 'This report has been prepared in accordance with the GRI Standards: Core option';	This report has been prepared in accordance with the GRI Standards: Core option
	ii. 'This report has been prepared in accordance	
	ii. This report has been prepared in accordance	



	with the GRI Standards: Comprehensive option'.	
102-55 102-55	a. The GRI content index, which specifies each of the GRI Standards used and lists all disclosures included in the report.	This document
	b. For each disclosure, the content index shall include: i. the number of the disclosure (for disclosures covered by the GRI Standards); ii. the page number(s) or URL(s) where the information can be found, either within the report or in other published materials; iii. if applicable, and where permitted, the reason(s) for omission when a required disclosure cannot be made.	i. the number of the disclosure is indicated in the index. Mainly, the report is based on GRI Standards 2016. ii. Page numbers, URL(S) and further references are marked and interlinked. iii. reasons for omissions are provided where applicable.
102-56 102-56	a. A description of the organisation's policy and current practice with regard to seeking external assurance for the report.	No external assurance of the sustainability and GRI report
	b. If the report has been externally assured: i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process; ii. The relationship between the organisation and the assurance provider; iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organisation's sustainability report.	Not applicable

Economy

Number	Description	Additional content, references, or reasons
		for omission
GRI 205:	Anti-corruption (2016)	
103-1	a. An explanation of why the topic is material.	Pages 47-53 (Business Integrity)
	b. The Boundary for the material topic, which	
	includes a description of:	Cembra operates in Switzerland only. The
	i. where the impacts occur;	country is ranked among the least corrupt in
	ii. the organisation's involvement with the	Transparency International's worldwide
	impacts. For example, whether the organisation	index https://www.transparency.org/cpi2018
	has caused or contributed to the impacts, or is	(No 3 of 180 in 2018).
	directly linked to the impacts through its business	The subject is covered and considered to be
	relationships.	material in regard of Cembra's exposure to
	c. Any specific limitation regarding the topic	money laundering risks.



Boundary.	
a. An explanation of how the organisation Pages 47-	-53 (Business Integrity)
manages the topic.	
b. A statement of the purpose of the management	
approach.	
c. A description of the following, if the	
management approach includes that component:	
i. Policies	
ii. Commitments	
iii. Goals and targets	
iv. Responsibilities	
v. Resources	
vi. Grievance mechanisms	
vii. Specific actions, such as processes, projects,	
programs and initiatives	
1 3	-53 (Business Integrity)
evaluates the management approach, including:	55 (Business Integrity)
i. the mechanisms for evaluating the effectiveness	
of the management approach;	
ii. the results of the evaluation of the management	
approach;	
iii. any related adjustments to the management	
approach.	
	bers of the Board of Directors as
	ne Management Board are required
	to the Code of Conduct that
	relevant anti-corruption guidelines.
	S
Since Cer	mbra operates in Switzerland only
	mation is not broken down into
regions.	
	oyees are informed about and
	n compliance and anti-money
	ng and required to adhere to the
	Conduct that includes relevant anti-
	on guidelines.
For detai	ls, see page 40 (People and
developn	nent) and pages 47, 51 (Business
integrity))
Since Cer	mbra operates in Switzerland only
	mation is not broken down into
regions.	
	-51 (Business Integrity)
partners that the organisation's anti-corruption	J •
policies and procedures have been	



	business partner and region. Describe if the	
	organisation's anti-corruption policies and	
	procedures have been communicated to any	
	other persons or organisations.	
	d. Total number and percentage of governance	See GRI 205-2a.
	body members that have received training on	
	anti-corruption, broken down by region.	
Ecology	1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1	1
Number	Description	Additional content, references, or reasons
Nullibei	Description	for omission
		TOT OHIISSION
GRI 302:	Energy (2016)	
103-1	a. An explanation of why the topic is material.	Pages 45-46 (Environmental Stewardship)
	b. The Boundary for the material topic, which	1
	includes a description of:	
	i. where the impacts occur;	
	ii. the organisation's involvement with the	
	impacts. For example, whether the organisation	
	has caused or contributed to the impacts, or is	
	directly linked to the impacts through its business	
	relationships.	
	c. Any specific limitation regarding the topic	1
102.2	Boundary.	D 45 46 (E : 110 111)
103-2	a. An explanation of how the organisation	Pages 45-46 (Environmental Stewardship)
	manages the topic.	-
	b. A statement of the purpose of the management	
	approach.	_
	c. A description of the following, if the	
	management approach includes that component:	
	i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Pages 45-46 (Environmental Stewardship)
	evaluates the management approach, including:	
	i. the mechanisms for evaluating the effectiveness	
	of the management approach;	Please note that "environmental
	ii. the results of the evaluation of the management	stewardship" is a new topic in 2019 and that
	approach;	it was not part of the systematic internal
	iii. any related adjustments to the management	review processes (e.g. audits).
	approach.	It is planned that will be purcued for the
	approxim	2020 reporting period for the first time.
302-1	a. Total fuel consumption within the organisation	Page 45-46 (Environmental Stewardship)
302-1	from non-renewable sources, in joules or	1 age 45-40 (Environmental Stewardship)
	from non-renewable sources, in joules of	



	multiples, and including fuel types used.	
	b. Total fuel consumption within the organisation from renewable sources, in joules or multiples,	Page 45-46 (Environmental Stewardship)
	and including fuel types used. c. In joules, watt-hours or multiples, the total: i. electricity consumption ii. heating consumption iii. cooling consumption	Page 45-46 (Environmental Stewardship)
	iv. steam consumptiond. In joules, watt-hours or multiples, the total:i. electricity sold	Cembra does not sell energy to third parties.
	ii. heating sold iii. cooling sold iv. steam sold	Dagge 45 46 (Environmental Stawandship)
	e. Total energy consumption within the organisation, in joules or multiples.	Pages 45-46 (Environmental Stewardship)
	f. Standards, methodologies, assumptions, and/or calculation tools used.	Energy usage and emissions from energy are calculated based on the service charge invoices of our Zurich headquarters and converted into CO2 as of the ENaW conversion factors defined by the Federal Office for the Environment (Bundesamt für Umwelt). The gas and diesel usage of the company-owned lease fleet is calculated by the actual number of kilometres driven and converted into CO2 according to the official CO2 emissions per vehicle. The scope of these indicators is Cembra without acquisitions.
	g. Source of the conversion factors used.	See 302f
103-1	Emissions (2016) a. An explanation of why the topic is material. b. The Boundary for the material topic, which includes a description of: i. where the impacts occur; ii. the organisation's involvement with the impacts. For example, whether the organisation has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships. c. Any specific limitation regarding the topic Boundary.	Pages 45-46 (Environmental Stewardship)
103-2	a. An explanation of how the organisation manages the topic.b. A statement of the purpose of the management approach.c. A description of the following, if the	Pages 45-46 (Environmental Stewardship)



	management approach includes that component: i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Pages 45-46 (Environmental Stewardship)
	evaluates the management approach, including:	
	i. the mechanisms for evaluating the effectiveness	
	of the management approach;	
	ii. the results of the evaluation of the management	
	approach;	
	iii. any related adjustments to the management	
	approach.	
305-1	a. Gross direct (Scope 1) GHG emissions in	Page 46 (Environmental Stewardship)
	metric tons of CO2 equivalent.	
	b. Gases included in the calculation; whether	As confirmed by EnAW no other gases but
	CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	CO2 are taken into account.
	c. Biogenic CO2 emissions in metric tons of CO2	not applicable
	equivalent.	
	d. Base year for the calculation, if applicable,	Cembra compares its emissions over time.
	including:	For details, see page 46 (Environmental
	i. the rationale for choosing it;	Stewardship)
	ii. emissions in the base year;	
	iii. the context for any significant changes in	
	emissions that triggered recalculations of base	
	year emissions.	
	e. Source of the emission factors and the global	see 302f
	warming potential (GWP) rates used, or a	
	reference to the GWP source.	
	f. Consolidation approach for emissions; whether	Not applicable as scope is Zurich
	equity share, financial control, or operational	headquarters only
	control.	
	g. Standards, methodologies, assumptions,	see 302f
	and/or calculation tools used.	

Society

Number	Description	Additional content, references, or reasons
		for omission
CDI 401: E	mployment (2016)	
GRI 4UL. E		
103-1	a. An explanation of why the topic is material.	Page 38-44 (People and development)
	· · · · · · · · · · · · · · · · · · ·	Page 38-44 (People and development)



	1	<u> </u>
	i. where the impacts occur;	
	ii. the organisation's involvement with the	
	impacts. For example, whether the organisation	
	has caused or contributed to the impacts, or is	
	directly linked to the impacts through its business	
	relationships.	
	c. Any specific limitation regarding the topic	
	Boundary.	
103-2	a. An explanation of how the organisation	Page 38-44 (People and development)
	manages the topic.	
	b. A statement of the purpose of the management	
	approach.	
	c. A description of the following, if the	
	management approach includes that component:	
	i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Page 38-44 (People and development)
103 3	evaluates the management approach, including:	rage 30 11 (1 copie and development)
	i. the mechanisms for evaluating the effectiveness	
	of the management approach;	
	ii. the results of the evaluation of the management	
	approach;	
	iii. any related adjustments to the management	
401-1	approach. a. Total number and rate of new employee hires	Dage 29 (Deeple and devisionment)
401-1		Page 38 (People and development)
	during the reporting period, by age group, gender and region.	Navy ammlayas hims are not treated an
	gender and region.	New employee hires are not tracked or
		published in more detail regarding age,
	h Tatal acceptance of section 1	gender or region.
	b. Total number and rate of employee turnover	Page 38 (People and development) informs
	during the reporting period, by age group,	about overall turnover rates, including
	gender and region.	explanations. The indicators are not made
	<u> </u>	public in more detail.
GRI 404: T	raining and Education (2016)	
103-1	a. An explanation of why the topic is material.	Page 38-44 (People and development)
105-1	b. The Boundary for the material topic, which	1 age 50-44 (1 copie and development)
	-	
	includes a description of:	
	i. where the impacts occur;	
	ii. the organisation's involvement with the	
	impacts. For example, whether the organisation	
	has caused or contributed to the impacts, or is	



	directly linked to the impacts through its business relationships.	
	c. Any specific limitation regarding the topic Boundary.	
103-2	a. An explanation of how the organisation	Page 38-44 (People and development)
	manages the topic.	
	b. A statement of the purpose of the management	
	approach.	
	c. A description of the following, if the	
	management approach includes that component:	
	i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Page 38-44 (People and development)
	evaluates the management approach, including:	
	i. the mechanisms for evaluating the effectiveness	
	of the management approach;	
	ii. the results of the evaluation of the management	
	approach;	
	iii. any related adjustments to the management	
	approach.	
404-1	a. Average hours of training that the	Page 40 (People and development)
	organisation's employees have undertaken during	
	the reporting period, by:	Training indicators are not further broken
	i. gender;	down by gender or employee category
	ii. employee category.	within the organisation.
GRI 405:	Diversity and Equal Opportunity (2016)	
103-1	a. An explanation of why the topic is material.	Page 38-44 (People and development)
105 1	b. The Boundary for the material topic, which	1 age 50 11 (1 copie and development)
	includes a description of:	
	i. where the impacts occur;	
	ii. the organisation's involvement with the	
	impacts. For example, whether the organisation	
	has caused or contributed to the impacts, or is	
	directly linked to the impacts through its business	
	relationships.	
	c. Any specific limitation regarding the topic	
	Boundary.	
103-2	a. An explanation of how the organisation	Page 38-44 (People and development)
103-2		1 age 30-44 (1 copie and development)
	manages the topic.	
	b. A statement of the purpose of the management	
	approach.	



	c. A description of the following, if the	
	management approach includes that component:	
	i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Page 38-44 (People and development)
	evaluates the management approach, including:	
	i. the mechanisms for evaluating the effectiveness	
	of the management approach;	
	ii. the results of the evaluation of the management	
	approach;	
	iii. any related adjustments to the management	
	approach.	
405-1	a. Percentage of individuals within the	Pages 61-68 (Board of Directors)
	organisation's governance bodies in each of the	
	following diversity categories:	
	i. Gender;	
	ii. Age group: under 30 years old, 30-50 years	
	old, over 50 years old;	
	iii. Other indicators of diversity where relevant	
	(such as minority or vulnerable groups).	
	b. Percentage of employees per employee	Page 43 (People and development)
	category in each of the following diversity	1 age 43 (1 copic and development)
	categories:	
	i. Gender;	
	1	
	ii. Age group: under 30 years old, 30-50 years	
	old, over 50 years old;	
	iii. Other indicators of diversity where relevant	
	(such as minority or vulnerable groups).	
GRI 417: N	larketing and Labeling (2016)	
103-1	a. An explanation of why the topic is material.	Pages 34-37 (Quality and integrity of
	b. The Boundary for the material topic, which	products) and pages 32-33 (Customer
	includes a description of:	orientation)
	i. where the impacts occur;	, , , , , , , , , , , , , , , , , , ,
	ii. the organisation's involvement with the	
	impacts. For example, whether the organisation	
	has caused or contributed to the impacts, or is	
	directly linked to the impacts through its business	
	relationships.	
	c. Any specific limitation regarding the topic	
	Boundary.	
103.2	•	Pages 34.37 (Quality and integrity of
103-2	a. An explanation of how the organisation	Pages 34-37 (Quality and integrity of



	manages the topic.	products) and pages 32-33 (Customer
	b. A statement of the purpose of the management	orientation)
	approach.	
	c. A description of the following, if the	
	management approach includes that component:	
	i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Pages 34-37 (Quality and integrity of
	evaluates the management approach, including:	products) and pages 32-33 (Customer
	i. the mechanisms for evaluating the effectiveness	orientation)
	of the management approach;	
	ii. the results of the evaluation of the management	
	approach;	
	iii. any related adjustments to the management	
	approach.	
417-3	a. Total number of incidents of non-compliance	i. none
	with regulations and/or voluntary codes	ii. none
	concerning marketing communications, including	iii. none (see Annual Report page 48)
	advertising, promotion, and sponsorship, by:	
	i. incidents of non-compliance with regulations	
	resulting in a fine or penalty;	
	ii. incidents of non-compliance with regulations	
	resulting in a warning;	
	iii. incidents of non-compliance with voluntary	
	codes.	
	b. If the organisation has not identified any non-	See GRI 417-3a
	compliance with regulations and/or voluntary	
	codes, a brief statement of this fact is sufficient.	
CDI 440: 0	uctomor Privacy (2016)	
103-1	ustomer Privacy (2016)	Page 50 (Business integrity)
103-1	a. An explanation of why the topic is material.	rage 50 (Business integrity)
	b. The Boundary for the material topic, which includes a description of:	
	*	
	i. where the impacts occur;	
	ii. the organisation's involvement with the	
	impacts. For example, whether the organisation	
	has caused or contributed to the impacts, or is	
	directly linked to the impacts through its business	
	relationships.	
	c. Any specific limitation regarding the topic	
102.2	Boundary.	Page 50 (Paging of the St.)
103-2	a. An explanation of how the organisation	Page 50 (Business integrity)



	manages the topic.	
	b. A statement of the purpose of the management	
	approach.	
	c. A description of the following, if the	
	management approach includes that component:	
	i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Page 50 (Business integrity)
103 3	evaluates the management approach, including:	rage 50 (Business integrity)
	i. the mechanisms for evaluating the effectiveness	
	of the management approach;	
	ii. the results of the evaluation of the management	
	approach;	
	iii. any related adjustments to the management	
	approach.	
418-1	a. Total number of substantiated complaints	Confidentiality constraints; substantiated
410-1	received concerning breaches of customer	complaints are reported to the regulator
	privacy, categorized by:	complaints are reported to the regulator
	i. complaints received from outside parties and	
	substantiated by the organisation;	
	ii. complaints from regulatory bodies.	
	b. Total number of identified leaks, thefts, or	Confidentiality constraints, substantiated
	losses of customer data.	Confidentiality constraints; substantiated
		complaints are reported to the regulator
	c. If the organisation has not identified any	Confidentiality constraints; substantiated
	substantiated complaints, a brief statement of	complaints are reported to the regulator
	this fact is sufficient.	
Additional	Disclosures: Customer Orientation	
103-1	a. An explanation of why the topic is material.	Page 32-33 (Customer orientation)
100 1	b. The Boundary for the material topic, which	2 age 52 55 (Customer offentation)
	includes a description of:	
	i. where the impacts occur;	
	ii. the organisation's involvement with the	
	impacts. For example, whether the organisation	
	has caused or contributed to the impacts, or is	
	directly linked to the impacts through its business	
	relationships.	
	c. Any specific limitation regarding the topic	
102.2	Boundary.	D 22.22 (G)
103-2	a. An explanation of how the organisation	Page 32-33 (Customer orientation)
	manages the topic.	
	b. A statement of the purpose of the management	



	approach.	
	c. A description of the following, if the	
	management approach includes that component:	
	i. Policies	
	ii. Commitments	
	iii. Goals and targets	
	iv. Responsibilities	
	v. Resources	
	vi. Grievance mechanisms	
	vii. Specific actions, such as processes, projects,	
	programs and initiatives	
103-3	a. An explanation of how the organisation	Page 32-33 (Customer orientation)
	evaluates the management approach, including:	
	i. the mechanisms for evaluating the effectiveness	
	of the management approach;	
	ii. the results of the evaluation of the management	
	approach;	
	iii. any related adjustments to the management	
	approach.	
Disclosure	a. Customer satisfaction (Net Promoter Score)	Page 32 (Customer orientation)

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