

Cembra GRI Content Index 2020

References

The Cembra Annual Report 2020 (including the Sustainability Report 2020) is available at www.cembra.ch/financialreports. The Annex to the Sustainability Report 2020, this GRI Content Index 2020 and other sustainability-related disclosures are available at www.cembra.ch/sustainability.

Materiality Matrix

The materiality matrix was renewed in 2020 and it is disclosed in the Cembra Annual Report 2020 (“AR 2020”), page 31.

GRI-Overview

As a result of our engagement with our main stakeholders in 2020 (see Cembra Annual Report 2020, pages 31-32), no changes were made to the company’s most relevant sustainability themes in 2020.

Material Topic	Description	GRI Standard
Customer orientation	<ul style="list-style-type: none"> Responsible products and services Customer satisfaction 	Additional Disclosures: Customer Orientation (Cembra Annual Report 2019 p. 32-33)
Quality and integrity of products and services	<ul style="list-style-type: none"> Product safety Responsible treatment of customers Access to finance 	GRI 417 Marketing and Labelling
People and development	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Environmental management of Cembra’s operations, incl. energy and emissions Vehicle financing (product offering) 	GRI 302 Energy GRI 305 Emissions
Business integrity	<ul style="list-style-type: none"> 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
Organisational 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 2020 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 2020 page 5 (Product markets) Cembra AR 2020 pages 66-67 (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 2020 page 66-67 (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. Switzerland ii. all sectors served iii. private and corporate customers For details, see AR 2020 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. AR 2020 page 3 (Key figures and profile) ii. AR 2020 pages 66-67 (Group Structure) iii. AR 2020 page 115 (Financial Report) iv. AR 2020 page 120 (Financial Report) v. AR 2020 pages 11-17 (Product markets)
102-8	a. Total number of employees by employment contract (permanent and temporary), by gender.	See AR 2020 pages 41 and 49 (People and development) Approximately 2% of all employees have a temporary contract; see Annex to Sustainability Report 2020 page 6
102-8	b. Total number of employees by employment contract (permanent and temporary), by region.	Since Cembra operates in Switzerland only. Therefore, 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.	See AR 2020 page 47 (People and development) and Annex to Sustainability

		Report 2020 page 4 (Supplemental information: People and development)
	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 performed by workers who are not employees.	The vast majority of workers are employees of Cembra. In 2020, temporary workers from agencies accounted for 2% (2019: 2%) of the workforce. See AR 2020 page 41.
	e. Any significant variations in the numbers reported in Disclosures 102-8-a, 102-8-b, and 102-8-c (such as seasonal variations in the tourism or agricultural industries).	Being active in the financial sector, there are no seasonal variations in employee numbers at Cembra.
	f. An explanation of how the data have been compiled, including any assumptions made.	Employment data is managed in a centralised system by the Human Resources Department. The data reported is valid as of 31.12.2020 including all registered mutations at this point of time. No assumptions were made.
102-9	a. A description of the organisation's supply chain, including its main elements as they relate to the organisation's activities, primary brands, products, and services.	AR 2020 page 5 (About Cembra) AR 2020 pages 58-60 (Business integrity)
102-10	a. Significant changes to the organisation's size, structure, ownership, or supply chain, including: i. Changes in the location of, or changes in, operations, including facility openings, closings, and expansions; ii. Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organisations); iii. Changes in the location of suppliers, the structure of the supply chain, or relationships with suppliers, including selection and termination.	i. none ii. none iii. none For details, see AR 2020 page 9 (Significant developments) and page 66-67 (Group Structure and shareholders)
102-11	a. Whether and how the organisation applies the Precautionary Principle or approach.	AR 2020 pages 41-50 (People and development), AR 2020 pages 51-54 (Environmental stewardship), AR 2020 pages 55-63 (Business integrity)
102-12	a. A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organisation subscribes, or which it endorses.	Principles for responsible lending in Switzerland Marketing convention for consumer credit in Switzerland Marketing convention for credit cards in Switzerland Energy Agency of the Swiss Private Sector (EnAW) United Nations Global Compact

		For details, see AR 2020 page 30 (Our approach to sustainability), page 37 (Marketing and sales), page 38 (Customer information) and page 52 (Energy Agency)
102-13	a. A list of the main memberships of industry or other associations, and national or international advocacy organisations.	Swiss Banking Association Economisuisse Konsumfinanzierung Schweiz Leasing Association
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.	AR 2020 page 28 (Letter from the Chairman)
Ethics and integrity (2016)		
102-16	a. A description of the organisation's values, principles, standards, and norms of behavior.	AR 2020 pages 29-33 (Our approach to sustainability) AR 2020 pages 55-63 (Business integrity) Code of Conduct (available at www.cembra.ch/governance)
Governance (2016)		
102-18 102-18	a. Governance structure of the organisation, including committees of the highest governance body.	AR 2020 page 66 (Structure), pages 80-84
	b. Committees responsible for decision-making on economic, environmental, and social topics.	Committees of the Board of Directors: - Audit and Risk Committee, - Compensation and Nomination Committee Committee on Management Level: - Sustainability Committee (since 2020). See AR 2020, page 30
Stakeholder engagement (2016)		
102-40	a. A list of stakeholder groups engaged by the organisation.	See AR 2020 page 31 (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. For details, see Annex to Sustainability Report 2020 section 5.7

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.	AR 2020 page 29 (Our approach to sustainability) AR 2020 page 34-35 (Customer orientation, regular NPS assessments, Customer complaints process and related figures) Code of Conduct (Customer complaints, available at www.cembra.ch/governance) AR 2020 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.	AR 2020 pages 29-33 (Our approach to sustainability) i. Renewed stakeholder engagement in AR 2020, page 31 ii. Comment on materiality matrix AR 2020, page 31
Reporting practice (2016)		
102-45	a. A list of all entities included in the organisation's consolidated financial statements or equivalent documents.	AR 2020 page 56 (Group Structure and shareholders)
102-45	b. Whether any entity included in the organisation's consolidated financial statements or equivalent documents is not covered by the report.	See AR 2020 page 30 (Coverage and reporting boundaries), and page 41 (coverage of employee data)
102-46	a. An explanation of the process for defining the report content and the topic Boundaries.	AR 2020 page 31-32 (Our approach to sustainability)
102-46	b. An explanation of how the organisation has implemented the Reporting Principles for defining report content.	AR 2020 page 31-32 (Our approach to sustainability)
102-47	a. A list of the material topics identified in the process for defining report content.	AR 2020 page 32 (Our approach to sustainability)
102-48	a. The effect of any restatements of information given in previous reports, and the reasons for such restatements.	Restatements of Scope 1 and Scope 2 carbon emissions, see AR 2020 page 51-52 for details, the effect and the reasons. This restatement is not material.
102-49	a. Significant changes from previous reporting periods in the list of material topics and topic Boundaries.	AR 2020 page 31-32 (Our approach to sustainability)
102-50	a. Reporting period for the information provided.	1 January 2020 – 31 December 2020
102-51	a. If applicable, the date of the most recent previous report.	Annual Report 2019, published 19 March 2020
102-52	a. Reporting cycle.	Annual

102-53	a. The contact point for questions regarding the report or its contents.	Marcus Händel, 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’; ii. ‘This report has been prepared in accordance with the GRI Standards: Comprehensive option’.	This report has been prepared in accordance with the GRI Standards: Core 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 index
	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.	AR 2020 pages 55-63 (Business Integrity) Cembra operates in Switzerland only. The country is ranked among the least corrupt in Transparency International's worldwide index https://www.transparency.org/en/cpi/2020/index (No 3 of 180 in 2020). The subject is covered and considered to be material in regard of Cembra's exposure to money laundering risks.
	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.	
103-2	a. An explanation of how the organisation manages the topic.	AR 2020 pages 55-63 (Business integrity)
	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 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.	AR 2020 pages 55-63 (Business integrity)
205-2	a. Total number and percentage of governance body members that the organisation's anti-corruption policies and procedures have been communicated to, broken down by region.	All members of the Board of Directors as well as the Management Board are required to adhere to the Code of Conduct (available at www.cembra.ch/governance) that includes relevant anti-corruption guidelines.

		Since Cembra operates in Switzerland only the information is not broken down into regions.
	b. Total number and percentage of employees that the organisation’s anti-corruption policies and procedures have been communicated to, broken down by employee category and region.	All employees are informed about and trained in compliance and anti-money laundering and required to adhere to the Code of Conduct (available at www.cembra.ch/governance) that includes relevant anti-corruption guidelines. For details, see AR 2020 page 44 (People and development) and pages 61 (Business integrity) Since Cembra operates in Switzerland only, the information is not broken down into regions.
	c. Total number and percentage of business partners that the organisation’s anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organisation’s anti-corruption policies and procedures have been communicated to any other persons or organisations.	AR 2020 pages 55-63 (Business Integrity)
	d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.	See GRI 205-2a.

Ecology

Number	Description	Additional content, references, or reasons for omission
GRI 302: Energy (2016)		
103-1	a. An explanation of why the topic is material.	AR 2020 pages 32 (Our approach to sustainability) and 51-54 (Environmental stewardship)
	b. The Boundary for the material topic, which includes a description of: <ul style="list-style-type: none"> 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 manages the topic.	

	<p>b. A statement of the purpose of the management approach.</p> <p>c. A description of the following, if the management approach includes that component:</p> <ul style="list-style-type: none"> 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 	AR 2020 pages 51-54 (Environmental stewardship) and Annex to Sustainability Report 2020 pages 7-8
103-3	<p>a. An explanation of how the organisation evaluates the management approach, including:</p> <ul style="list-style-type: none"> 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. 	AR 2020 pages 51-54 (Environmental stewardship)
302-1	<p>a. Total fuel consumption within the organisation from non-renewable sources, in joules or multiples, and including fuel types used.</p>	AR 2020 page 52-53 (Environmental stewardship)
	<p>b. Total fuel consumption within the organisation from renewable sources, in joules or multiples, and including fuel types used.</p>	AR 2020 pages 52-53 (Environmental stewardship)
	<p>c. In joules, watt-hours or multiples, the total:</p> <ul style="list-style-type: none"> i. electricity consumption ii. heating consumption iii. cooling consumption iv. steam consumption 	AR 2020 pages 52-53 (Environmental stewardship)
	<p>d. In joules, watt-hours or multiples, the total:</p> <ul style="list-style-type: none"> i. electricity sold ii. heating sold iii. cooling sold iv. steam sold 	Cembra does not sell energy to third parties.
	<p>e. Total energy consumption within the organisation, in joules or multiples.</p>	AR 2020 pages 52-53 (Environmental stewardship)
	<p>f. Standards, methodologies, assumptions, and/or calculation tools used.</p>	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

		<p>converted into CO2 according to the official CO2 emissions per vehicle.</p> <p>Business air travel figures are based on actual flights, distance travelled, travel class and are converted into CO2 emissions according to the conversion factors of a leading Swiss carbon offsetting consulting agency.</p>
	g. Source of the conversion factors used.	See GRI 302-1f
GRI 305: Emissions (2016)		
103-1	a. An explanation of why the topic is material.	AR 2020 pages 51-54 (Environmental stewardship)
	<p>b. The Boundary for the material topic, which includes a description of:</p> <ul style="list-style-type: none"> 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 manages the topic.	AR 2020 pages 51-54 (Environmental stewardship) and Annex to Sustainability Report 2020 pages 7-8
	b. A statement of the purpose of the management approach.	
	<p>c. A description of the following, if the management approach includes that component:</p> <ul style="list-style-type: none"> 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	<p>a. An explanation of how the organisation evaluates the management approach, including:</p> <ul style="list-style-type: none"> 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. 	AR 2020 pages 51-54 (Environmental stewardship)
305-1	a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.	AR 2020 pages 51, 53 (Environmental stewardship)

	b. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all.	CO ₂
	c. Biogenic CO ₂ emissions in metric tons of CO ₂ equivalent.	not applicable
	d. Base year for the calculation, if applicable, including: i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.	Cembra compares its emissions over time. For details, see AR 2020 pages 51, 53 (Environmental Stewardship)
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	see GRI 302-1f
	f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	Not applicable as scope is Zurich headquarters only
	g. Standards, methodologies, assumptions, and/or calculation tools used.	see GRI 302-1f

Society

Number	Description	Additional content, references, or reasons for omission
GRI 401: Employment (2016)		
103-1	a. An explanation of why the topic is material.	AR 2020 pages 41-50 (People and development)
	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.	
103-2	a. An explanation of how the organisation manages the topic.	AR 2020 pages 41-50 (People and development)
	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	

	<ul style="list-style-type: none"> vi. Grievance mechanisms vii. Specific actions, such as processes, projects, programs and initiatives 	
103-3	<ul style="list-style-type: none"> a. An explanation of how the organisation evaluates the management approach, including: <ul style="list-style-type: none"> 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. 	AR 2020 pages 41-50 (People and development)
401-1	<ul style="list-style-type: none"> a. Total number and rate of new employee hires during the reporting period, by age group, gender and region. 	AR 2020 page 49 for number of new employee hires, by age group 50+ and by gender. 100% of new employees were hired in Switzerland.
	<ul style="list-style-type: none"> b. Total number and rate of employee turnover during the reporting period, by age group, gender and region. 	AR 2020 page 42 (Human resources management) informs about overall turnover rates, including explanations. The indicators are not made public in more detail.
GRI 404: Training and Education (2016)		
103-1	<ul style="list-style-type: none"> a. An explanation of why the topic is material. 	AR 2020 page 41-50 (People and development)
	<ul style="list-style-type: none"> b. The Boundary for the material topic, which includes a description of: <ul style="list-style-type: none"> 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. 	
	<ul style="list-style-type: none"> c. Any specific limitation regarding the topic Boundary. 	
103-2	<ul style="list-style-type: none"> a. An explanation of how the organisation manages the topic. 	AR 2020 pages 44-45 (Development and training)
	<ul style="list-style-type: none"> b. A statement of the purpose of the management approach. 	
	<ul style="list-style-type: none"> c. A description of the following, if the management approach includes that component: <ul style="list-style-type: none"> 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 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.	AR 2020 page 41-50 (People and development)
404-1	a. Average hours of training that the organisation's employees have undertaken during the reporting period, by: i. gender; ii. employee category.	AR 2020 pages 44-45 (Development and training) Training indicators are not further broken down by gender or employee category within the organisation.
GRI 405: Diversity and Equal Opportunity (2016)		
103-1	a. An explanation of why the topic is material.	AR 2020 pages 41-50 (People and development)
	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.	
103-2	a. An explanation of how the organisation manages the topic.	AR 2020 pages 49-50 (Diversity and equal pay) and page 63 (The "Flexible Work Arrangement Framework") and Annex to Sustainability Report 2020 page 6
	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 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.	AR 2020 pages 41-50 (People and development)

405-1	a. Percentage of individuals within the 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).	i.49% See AR 2020 page 49 (Diversity and equal pay), and Annex to Sustainability Report 2020 section 5.3 Board of Directors: AR 2020 page 71 Management Board AR 2020 page 85
	b. Percentage of employees per employee category 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).	See AR 2020 pages 49 (Diversity and equal pay) and Annex to Sustainability Report 2020 sections 5.2 to 5.4 (Supplemental information: People and development)
GRI 417: Marketing and Labeling (2016)		
103-1	a. An explanation of why the topic is material.	AR 2020 pages 34-35 (Customer orientation) and pages 36-40 (Quality and integrity of products)
	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.	
103-2	a. An explanation of how the organisation manages the topic.	AR 2020 pages 34-35 (Customer orientation) and pages 36-40 (Quality and integrity of products), Annex to Sustainability Report pages 2-3
	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 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	AR 2020 pages 34-35 (Customer orientation) and pages 36-40 (Quality and integrity of products)

	<p>approach;</p> <p>iii. any related adjustments to the management approach.</p>	
417-3	<p>a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by:</p> <p>i. incidents of non-compliance with regulations resulting in a fine or penalty;</p> <p>ii. incidents of non-compliance with regulations resulting in a warning;</p> <p>iii. incidents of non-compliance with voluntary codes.</p>	<p>i. none</p> <p>ii. none</p> <p>iii. none (see AR 2020 page 48)</p>
	<p>b. If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient.</p>	See GRI 417-3a
GRI 418: Customer Privacy (2016)		
103-1	<p>a. An explanation of why the topic is material.</p> <p>b. The Boundary for the material topic, which includes a description of:</p> <p>i. where the impacts occur;</p> <p>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.</p> <p>c. Any specific limitation regarding the topic Boundary.</p>	AR 2020 page 59 (Privacy and data protection)
103-2	<p>a. An explanation of how the organisation manages the topic.</p> <p>b. A statement of the purpose of the management approach.</p> <p>c. A description of the following, if the management approach includes that component:</p> <p>i. Policies</p> <p>ii. Commitments</p> <p>iii. Goals and targets</p> <p>iv. Responsibilities</p> <p>v. Resources</p> <p>vi. Grievance mechanisms</p> <p>vii. Specific actions, such as processes, projects, programs and initiatives</p>	AR 2020 page 55-63 (Business integrity)
103-3	<p>a. An explanation of how the organisation evaluates the management approach, including:</p> <p>i. the mechanisms for evaluating the effectiveness of the management approach;</p> <p>ii. the results of the evaluation of the management</p>	AR 2020 page 55-63 (Business integrity)

	<p>approach;</p> <p>iii. any related adjustments to the management approach.</p>	
418-1	<p>a. Total number of substantiated complaints received concerning breaches of customer privacy, categorized by:</p> <p>i. complaints received from outside parties and substantiated by the organisation;</p> <p>ii. complaints from regulatory bodies.</p>	Indicators are not disclosed due to confidentiality constraints; substantiated complaints are reported to the regulator
	<p>b. Total number of identified leaks, thefts, or losses of customer data.</p>	Indicators are not disclosed due to confidentiality constraints; substantiated complaints are reported to the regulator
	<p>c. If the organisation has not identified any substantiated complaints, a brief statement of this fact is sufficient.</p>	Indicators are not disclosed due to confidentiality constraints; substantiated complaints are reported to the regulator
<p>Additional Disclosures: Customer Orientation</p>		
103-1	<p>a. An explanation of why the topic is material.</p>	AR 2020 pages 34-35 (Customer orientation)
	<p>b. The Boundary for the material topic, which includes a description of:</p> <p>i. where the impacts occur;</p> <p>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.</p>	
	<p>c. Any specific limitation regarding the topic Boundary.</p>	
103-2	<p>a. An explanation of how the organisation manages the topic.</p>	AR 2020 pages 34-35 (Customer orientation)
	<p>b. A statement of the purpose of the management approach.</p>	
	<p>c. A description of the following, if the management approach includes that component:</p> <p>i. Policies</p> <p>ii. Commitments</p> <p>iii. Goals and targets</p> <p>iv. Responsibilities</p> <p>v. Resources</p> <p>vi. Grievance mechanisms</p> <p>vii. Specific actions, such as processes, projects, programs and initiatives</p>	
103-3	<p>a. An explanation of how the organisation evaluates the management approach, including:</p> <p>i. the mechanisms for evaluating the effectiveness of the management approach;</p> <p>ii. the results of the evaluation of the management approach;</p>	AR 2020 pages 34-35 (Customer orientation)

	iii. any related adjustments to the management approach.	
Disclosure	a. Customer satisfaction (Net Promoter Score)	AR 2020 page 34 (Customer orientation)

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