

PERFORMANCE BASED ON GRI STANDARDS

> GRI 102-40, 102-42

ECE's sustainability strategy focuses on a long-term approach and ongoing accountability, as the company is active not only in project development but also as a landlord and property manager, meaning it assumes responsibility for the long term. This has an impact on real estate planning and management and encompasses visitors, tenants, and investors, as well as other effects of the company's business activities. As an integrative part of urban planning, ECE wants to provide solutions to help cities achieve their goals of reducing CO₂ emissions.

To this end, ECE has clearly defined sustainability management structures, the core of which is a sustainability team consisting of a Sustainability Expert, Sustainability Manager, and Sustainability Team Leader. The latter reports to the Director Sustainability & Internal Services, who in turn acts as the point of contact for the eight-member ECE board – which includes the CEO. In addition, ECE has twelve sustainability coordinators from different sections who ensure that sustainability remains top of mind throughout the entire company. The Sustainability Team and the Director Sustainability & Internal Services strategically manage all of ECE's sustainability activities and monitor the social, economic, and political environment. In addition, they promote knowledge sharing within the company, coordinate sustainability projects throughout the group, and document progress to the board at least once every six months. Furthermore, an external sustainability advisory board has been monitoring ECE's sustainability activities since 2011. ECE maintains a dialog with its stakeholders to ensure that its sustainability strategy continues to

evolve and improve. The focus here is on tenant partners, investors, and visitors to the centers.

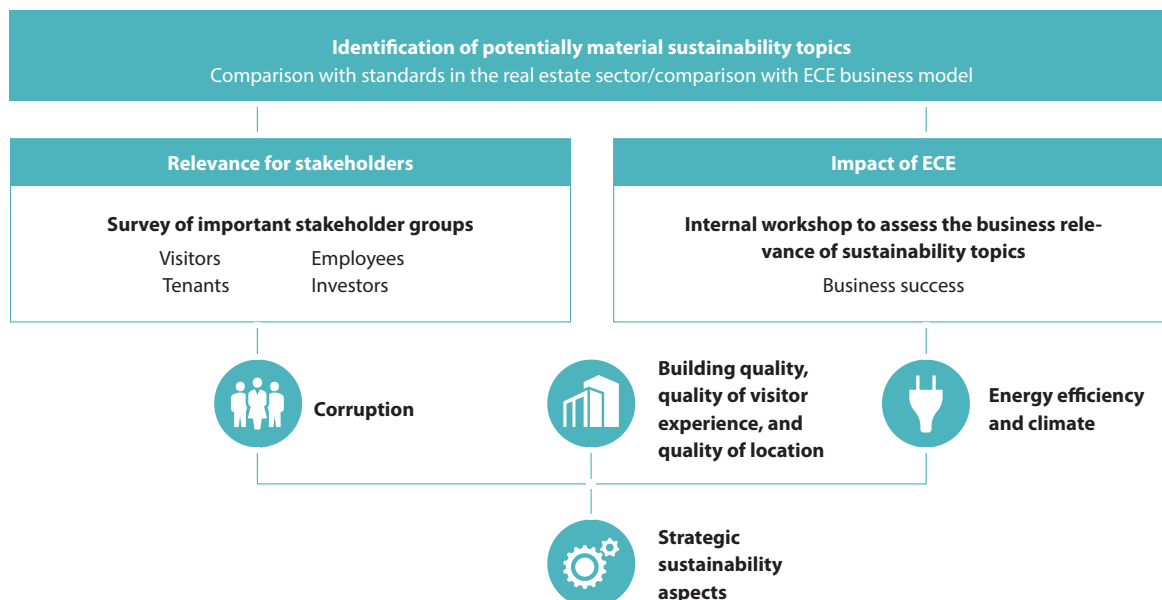
BECOMING MORE SUSTAINABLE TOGETHER

> GRI 102-43

ECE promotes a continuous dialog with its stakeholders through a variety of different formats. Information on sustainability activities is provided to employees on a regular basis, for example on a dedicated page on the intranet or through a communication campaign featuring the "Sustainables," ECE's sustainability heroes who were designated as such to raise employees' awareness of the issue. In addition, ECE has been sharing information on sustainability with tenants via two different formats since 2013: at the Retail Technical Meeting's annual events, where the focus is on technical topics such as energy efficiency and certification criteria, and at the sustainability forum, which focuses on joint workshops and knowledge sharing. To foster an ongoing dialog with investors, ECE also invites them to its roundtable event to discuss political regulations. Visitors can learn about the individual shopping centers' sustainability activities on their websites, and "Umdenkzettel" posters hanging in the centers call attention to the topic and what ECE is doing to become a more sustainable company.

Sustainability management at ECE includes regularly integrating stakeholders into the process. This is why ECE once again collected data on the relevant stakeholders' views on sustainability through a survey of tenants, visitors, and investors in 2020. //

> GRI 102-44, 102-46, 102-47



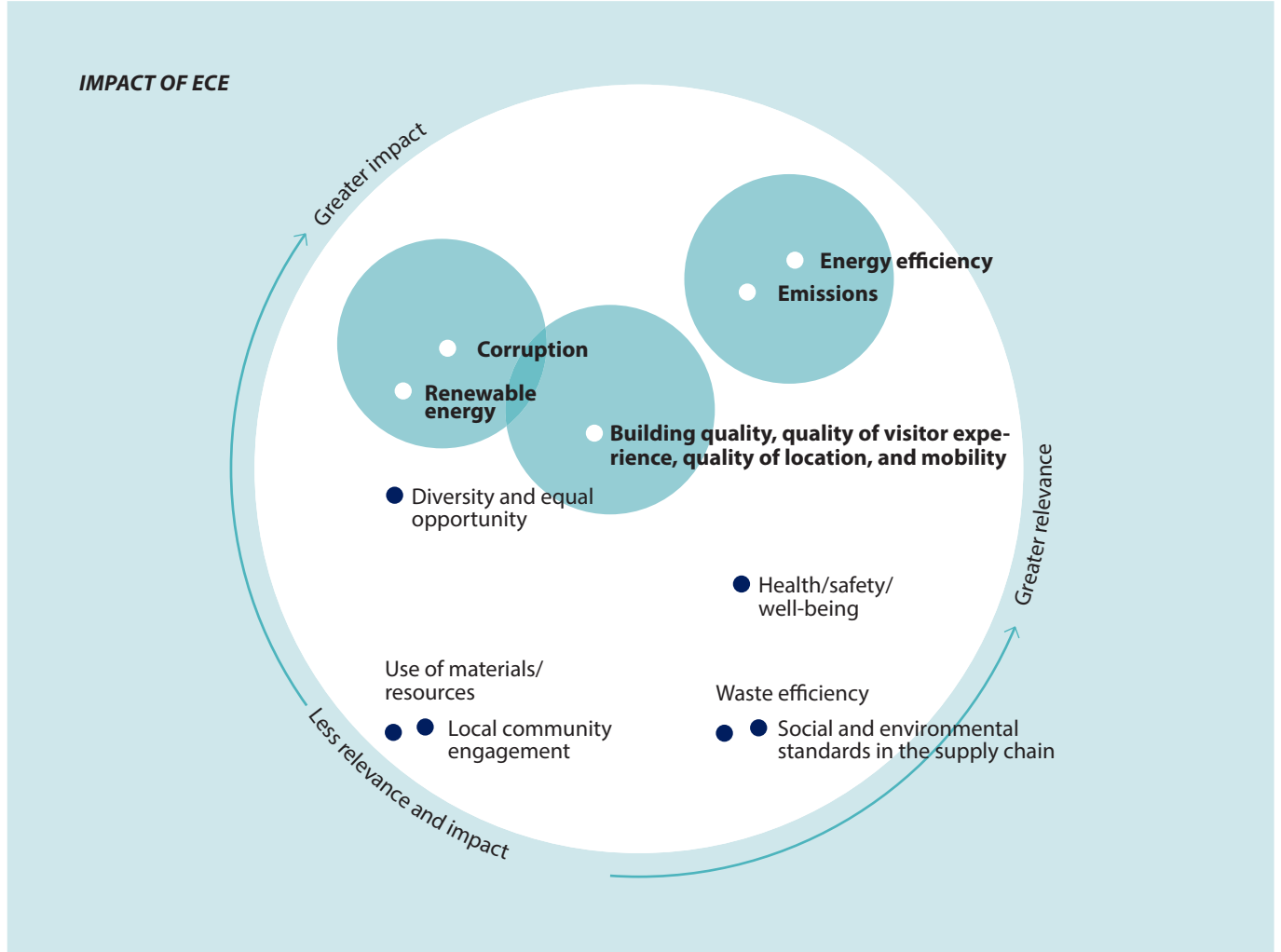
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MATERIALITY ASSESSMENT

> GRI 102-44, 102-46, 102-47, 102-49

Based on a multistage materiality and impact assessment, ECE defined and evaluated sustainability topics relevant to the company from both an external stakeholder and internal perspective. As a result, “energy ef-

ficiency and climate,” “corruption,” and “building quality, quality of visitor experience, and quality of location” form the primary focus of ECE’s sustainability efforts and are grouped into three main areas of activity.



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MATERIAL ASPECTS

> GRI 102-47

Based on the materiality assessment, the company identified the following aspects as material for reporting purposes and assessed their impact. They can be categorized into corresponding sustainability topics according to the Global Reporting Initiative (GRI) framework:



1. EMPLOYEES BY TYPE OF EMPLOYMENT (AS OF DECEMBER 31)

Number of ECE employees	2018	2019
Full-time, total	2,665	2,571
Full-time, women	1,075	1,025
Full-time, men	1,590	1,546
Part-time, total	672	719
Part-time, women	628	664
Part-time, men	44	55
Inactive, total	107	131
Inactive, women	88	106
Inactive, men	19	25
Vocational trainees, total	28	29
Vocational trainees, women	17	21
Vocational trainees, men	11	8
Permanent contract, total	3,383	3,219
Permanent contract, women	1,746	1,654
Permanent contract, men	1,637	1,565
Temporary contract, total	-	202
Temporary contract, women*	-	141
Temporary contract, men*	-	61

* The figures as of the reporting date of December 31, 2018 cannot be determined retroactively for temporary employment contracts concluded in 2018. The company does not have any employees subject to collective bargaining agreements.

2. EMPLOYEES BY REGION (AS OF DECEMBER 31)

Number of ECE employees	2018	2019
National	2,548	2,584
International	896	837
At headquarters*	1,359	1,363
Total workforce	3,444	3,421
Women	1,791	1,795
Men	1,653	1,626

*Excluding inactive employees.

3. EMPLOYEE AGE STRUCTURE (AS OF DECEMBER 31)

Number of ECE employees	2018	2019
Women 50+	462	489
Men 50+	523	560
Women 40–49	541	543
Men 40–49	531	509
Women 30–39	542	506
Men 30–39	461	428
Women under 30	246	257
Men under 30	138	129

4. NEW EMPLOYEES BY REGION AND GENDER (ANNUALIZED) > **GRI 102-41**

ECE hired a total of 411 new employees in 2019 (2018: 373), while 457 left the company (2018: 475). The turnover rate stood at 13.1 percent (2018: 13.4 percent).

ECE offers its employees a company pension plan, parental leave, and a group accident insurance policy including disability and invalidity coverage for employees in specific positions. Employees with temporary contracts can also participate in the company pension plan.

Number of ECE employees	2018	2019
New hires, women, national	146	140
New hires, men, national	109	135
New hires, women, international	70	84
New hires, men, international	48	52
New hires, women, headquarters	88	85
New hires, men, headquarters	54	67
New hires, women, total	216	224
New hires, men, total	157	187

5. EMPLOYEE DEPARTURES BY REGION AND GENDER (ANNUALIZED)

Number of ECE employees	2018	2019
Departures, women, national	148	144
Departures, men, national	140	133
Departures, women, international	110	88
Departures, men, international	77	92
Departures, women, headquarters	72	73
Departures, men, headquarters	59	61
Departures, women, total	258	232
Departures, men, total	217	225

6. EMPLOYEE TURNOVER RATE (ANNUALIZED)

Rate [%]	2018	2019
Employee turnover, national	11.0%	10.7%
Employee turnover, international	20.0%	20.4%
Employee turnover, total	13.4%	13.1%

7. SICK LEAVE RATE (ANNUALIZED)

Rate [%]	2018	2019
Sick leave rate, national	4.0%	3.6%

8. PARENTAL LEAVE (ANNUALIZED)

Number of ECE employees	2018	2019
On parental leave, total	221	220
Women	166	170
Men	55	50
Returned from parental leave	202	203
Women	148	157
Men	54	46
Return rate (women)	89.2%	92.4%
Return rate (men)	98.2%	92.0%
Returned from parental leave and are still with the company after 12 months	187	197
Women	141	154
Men	46	43
Retention rate (women)	84.9%	90.6%
Retention rate (men)	83.6%	86.0%

9. WOMEN IN MANAGEMENT POSITIONS (AS OF DECEMBER 31)

Rate [%]	2018	2019
Women in management positions, total	28.7%	27.1%
– Team leader	55.7%	55.6%
– Technical Manager	0.8%	0.8%
– HoD/CM	40.9%	39.6%
– Director/Senior Director	19.7%	16.4%
– Managing Director	28.6%	28.6%



Climate change not only poses major challenges for companies, it also affects every individual's quality of life – now and in the future. Real estate plays a key role in this regard. In Germany, buildings account for approximately one third of CO₂ emissions nationwide.

As an integrative part of urban planning, ECE wants to provide solutions to help cities achieve their goals of reducing CO₂ emissions. In this context, energy efficiency plays an important role. After all, properties consume energy for heating and lighting as well as for ventilation and cooling. ECE relies on numerous measures to increase energy efficiency. These include the use of modern lighting systems and intelligent lighting and ventilation concepts. The company's efficiency measures are backed by comprehensive energy controlling activities, which makes energy consumption transparent. With the help of such a system, ECE manages energy consumption efficiently and reduces emissions. Even before reducing CO₂ emissions was on everyone's lips, ECE elevated energy saving to one of its key objectives. ECE has introduced extensive measures to promote environmental management, contributing to the achievement of climate targets in the process. The company's shopping centers and headquarters are completely powered by electricity from renewable energy sources from certified suppliers.

To reduce the significant amount of energy required for artificial lighting and to save electricity, ECE relies on state-of-the-art lighting technologies. In this context, ECE engineers work closely with the Technical Managers at the centers. This makes it possible to combine the results of analyses and the development of innovative concepts with on-site experience and test them in the real world. In the process, internal experts like the ECE lighting designers are consulted and lighting systems are used that marry energy efficiency and outstanding lighting quality. Using the green lease framework, ECE is pushing ahead with additional sustainability measures in the lease areas. The handbook for tenant fit-out shows retail partners in the building how to install environmentally friendly materials and resource-friendly technology. In addition, ECE promotes forward-looking mobility concepts in urban areas by making spaces in its parking garages available for electric charging stations that shoppers can use to charge their electric vehicles. //

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ENERGY CONSUMPTION

ECE tracks the energy consumption of its shopping centers, corporate headquarters, and as a result of employee travel. A total of 88 shopping centers in Germany were included in the calculation of energy and emission data as well as water consumption.

TOTAL CONSUMPTION, ECE HEAD-QUARTERS (IN MWH)	2018	2019	DIFFERENCE TO PRIOR YEAR
Power	2,541.83	2,323.02	-8.6
District heating	4,314.60	4,224.90	-2.1
Gas	470.03	494.464	5.2

TOTAL CONSUMPTION, ECE CENTERS (IN MWH)	2018	2019	DIFFERENCE TO PRIOR YEAR IN %
Power	325,247.00	315,334.153	-3.0
District heating	160,963.50	161,584.859	0.4
Gas	63,761.89	65,170.309	2.2

The figures are not adjusted for climate conditions.

SPECIFIC CONSUMPTION, ECE CENTERS (KWH/M2)	2018	2019	DIFFERENCE TO PRIOR YEAR IN %
Power	12.03	11.67	-3.0
Heating	3.79	3.82	0.9
Gas	15.82	15.49	-2.1

Large-scale modernization measures and the installation of energy-efficient LED lighting are helping continuously reduce the amount of electricity consumed.

All of ECE's shopping centers in Germany were powered by green electricity in 2019. Data was projected based on two previous annual cycles.

GREENHOUSE GAS EMISSIONS

ECE has been purchasing electricity generated from renewable sources from certified suppliers since 2008. This applies throughout Germany to both the company's shopping centers and its headquarters in Hamburg. Reference values based on the German energy mix were used to calculate greenhouse gas emissions. The use of green power produces 0 kg of CO₂. The reported figures show the emissions generated during the production of the electricity (hydropower).

tCO ₂ EQUIVALENT	2018	2019*	DIFFERENCE TO PRIOR YEAR
Scope 1			
Gas	103.31	108.68	5.2
Scope 2			
Power	8.86	8.10	-8.6
District heating	1,268.30	1,242.94	-2.0

kgCO₂ EQUIVALENT/m², HEAD-QUARTERS	2018	2019	DIFFERENCE TO PRIOR YEAR IN %
Scope 1			
Gas	15.50	17.10	10.3
Scope 2			
Power	0.18	0.19	5.5
District heating	18.16	18.36	1.1

tCO₂ EQUIVALENT, CENTERS	2018	2019	DIFFERENCE TO PRIOR YEAR IN %
Scope 1			
Gas	14,014.8	14,324.38	2.2
Scope 2			
Power	5,313.46	1,099.65	-79.3
District heating	47,316.06	47,498.7	0.4

All of ECE's shopping centers in Germany were powered by green electricity in 2019. In 2018, a total of three centers were still powered by conventional electricity. The figures apply to the company's 88 centers in Germany.

kgCO₂ EQUIVALENT/m², CENTERS	2018	2019	DIFFERENCE TO PRIOR YEAR IN %
Scope 1			
Gas	2.36	2.41	2.2
Scope 2			
Power	1.97	0.41	-79.3
District heating	7.97	8.01	0.4

All of ECE's shopping centers in Germany were powered by green electricity in 2019. In 2018, a total of three centers were still powered by conventional electricity. The figures apply to the company's 88 centers in Germany.

SHOPPING CENTER WATER CONSUMPTION

ECE has implemented various measures to reduce water consumption, both at its shopping centers and at its corporate headquarters – from water-efficient faucets to waterless urinals for new developments.

HEADQUARTERS	2018	2019	DIFFERENCE TO PRIOR YEAR IN %
Absolute water consumption (m ³)	20,595	20,063	-2.6
Specific water consumption (liters/employee)	15.3	14.9	-2.6

ANNUAL OVERVIEW OF GENERATED WASTE

ECE tracks its generation of the waste types scrap wood, plastic, glass, nonrecyclable waste, organic waste, paper, and electronic waste. An increase in commercial waste was observed as a result of the refurbishment work carried out during the reporting period. To reduce the environmental impact of its use of copy paper, ECE completely switched to Blue Angel-certified printing paper in 2017.

Type of waste	2018	2019	UNIT
Scrap wood	3.15	4.5	tons
Nonrecyclable waste	10.02	22.28	tons
Glass	3.9	3.56	tons
Electronic waste	2.377	9.68	tons
Plastic	6.11	14.85	tons
Paper	12.44	12.79	tons

CENTERS	2018	2019	DIFFERENCE TO PRIOR YEAR IN %
Absolute water consumption (m ³)	2,103,736	2,087,100	-0.8
Specific water consumption (liters/visitor)	2.0	2.0	0.0

RESPONSIBLE CORPORATE GOVERNANCE

ECE's corporate values serve as the basic framework that guides the way employees interact with each other and with investors, tenants, and other business partners. The ECE code of conduct sets out binding standards of conduct for all ECE employees. Clear compliance requirements for management and employees that apply throughout the company help ensure compliance with laws and regulations, reduce risks, and increase the company's performance. These include:

- Guidelines for donations and sponsorships
- Guidelines for handling grants
- Guidelines for reviewing business partners
- Corporate policy related to antitrust law

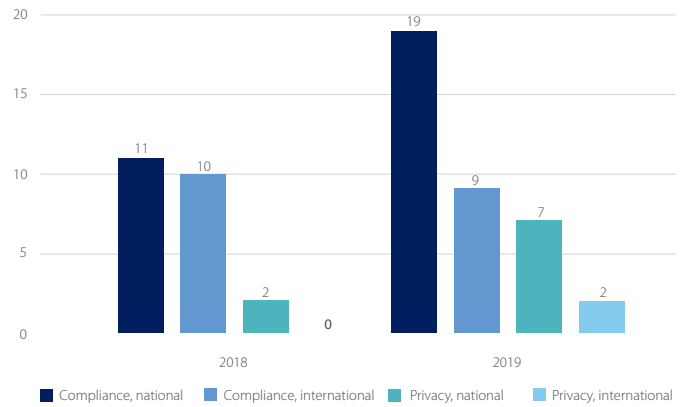
Both sustainability and compliance are an integral part of ECE's corporate values and are regularly addressed in management training courses, employee training courses, and during performance reviews.

Compliance is also a key element of the annual employee interviews that 100 percent of employees receive. Guiding questions are used to discuss aspects of daily work relevant to compliance.

Any violations of the standards laid down in the ECE code of conduct can be reported by employees and external parties via a compliance hotline. ECE employees also have access to ECE's BKMS[®] compliance system, which they can use to report any violations of the law or internal company policies – including anonymously, if they so desire. ECE introduced a compliance management system in order to implement the legal requirements and regulations, and this system was audited and certified by the Institute for Corporate Governance in the German Real Estate Industry (ICG) in 2014. The second and third audits including subsequent certification by ICG took place in March 2016 and November 2019.

ECE developed interactive in-person training sessions to convey in-depth knowledge of its compliance policies to senior management and specialist departments with increased compliance risk, and these sessions have been held regularly for selected employees in Germany and abroad since 2013. In addition, every employee in Germany and abroad is required to complete an online training course on the rules laid out in the code of conduct. This interactive online training session features case studies and raises employees' awareness of compliance risks during ECE's day-to-day business. //

NUMBER OF SUSPECTED CASES* OR INCIDENTS*

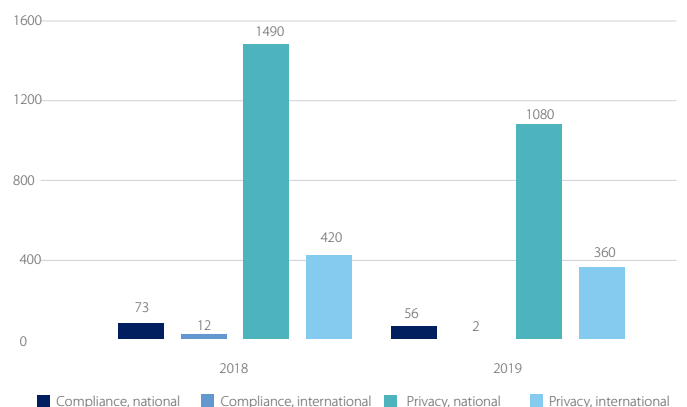


*Suspected compliance case: any indication of possible unlawful behavior on the part of ECE employees or third parties (external) acting on ECE's behalf or instructed by ECE employees.

**Privacy incident: detected violations of applicable privacy law and/or internal privacy policies

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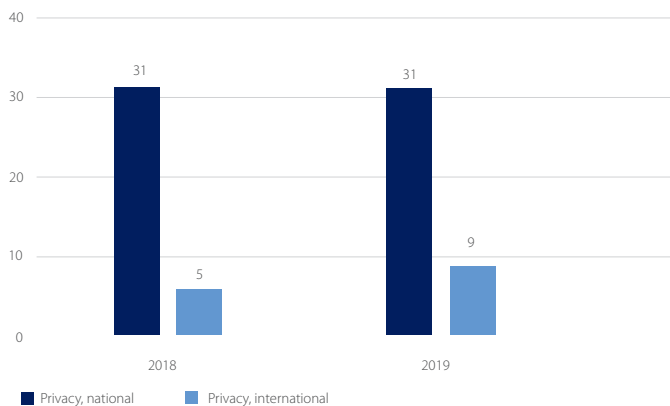
INQUIRIES*



* Since 2018, the focus of inquiries has been on legal, contractual, and other matters specific to individual shopping centers, particularly in the context of the GDPR (privacy/data protection), as well as on questions regarding the lawfulness of gifts/invitations and topics relating to conflicts of interest (compliance).

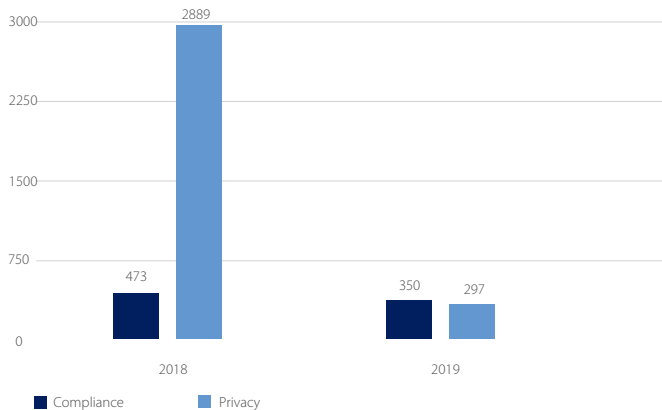
* Resulting CDS measures: Informational and training measures as well as the definition of standards, when appropriate.

ASSERTION OF RIGHTS BY DATA SUBJECTS UNDER THE GDPR*



* Includes requests for deletion of personal data in accordance with article 17 of the GDPR, objections to data processing in accordance with article 21 of the GDPR, and requests for information in accordance with article 15 of the GDPR.

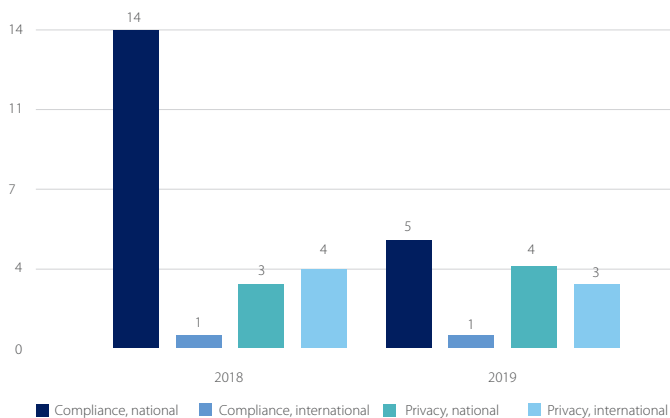
ONLINE TRAINING SEMINARS*



* All new employees (including temporary campus staff) are trained online. The number of employees trained in 2018 is significantly higher due to the rollout of the new GDPR online training.

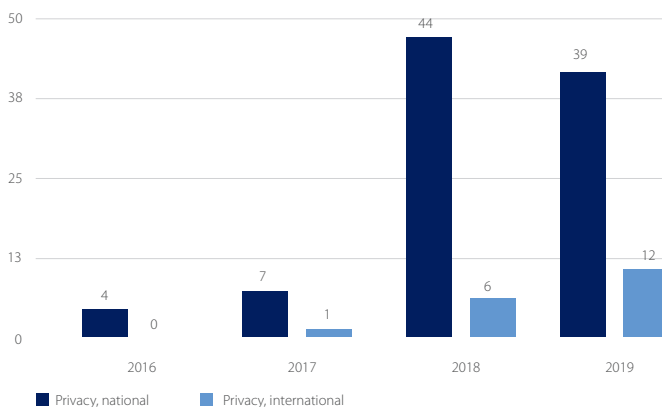
* Employees not yet trained (as of December 2019): compliance: 109 employees, privacy: 131 employees

IN-PERSON TRAINING SEMINARS*



* In-person training seminars are only held for certain groups of employees (sections), usually (1) based on risk potential aspects and/or in the event of a specific need (e.g. an increase in the number of suspected compliance cases in a section) and (2) if necessary, at the specific request of a section.

NUMBER OF PRIVACY AND IT SECURITY AUDITS AT CENTERS



BUILDING QUALITY, QUALITY OF VISITOR EXPERIENCE, QUALITY OF LOCATION, AND MOBILITY

Besides the economical use of building sites and land recycling, ECE's sustainability goals include the high durability and universal usability of buildings and their easy conversion and, if necessary, demolition. In addition, the use of environmentally friendly and nonhazardous substances and materials, comprehensive materials management, and the efficient use of energy also play an extremely important role.

At ECE, integrating sustainability aspects into every phase of the construction process is a key element of this strategy. After planning and building its shopping centers, the company remains active during their operation and assumes responsibility for the location. ECE pays particular attention to sustainability aspects during the construction and operation of new shopping centers as well as the modernization and expansion – i.e. the refurbishment – of its existing shopping centers.

ECE has published four handbooks on the sustainability aspects of shopping centers that have been adopted by the industry, and these serve as the basis for a comprehensive approach to sustainability. ECE actively involves tenants in this process and provides practical recommendations for ways to protect the environment and combat climate change. The handbooks, which were developed based on the results of workshops at the sustainability forum, include specific recommendations and checklists. The *Sustainable Shopping Centers* handbook serves as a guideline for the development of shopping centers from the planning stage onwards and outlines all of the sustainability measures that are necessary during the development of a project. *Sustainable Operation of Shopping Centers* supplements the previous

handbook and covers the work of Center Managers and Technical Managers. The *Electric Transportation* handbook provides information on the potential ways to integrate services related to charging stations for electric vehicles at the site, which the company plans to install at all of its shopping centers by 2025. The *Building Products for Tenant Fit-Out* handbook serves as a practical guide to designing stores in order to create environmentally and climate-friendly buildings.

In addition, ECE provides visitors to its shopping centers with information on the eco-friendly aspects of the centers. Since 2015, ECE has presented visitors with 15 topics ranging from waste separation to green power on "Umdenkzettel" posters. This information is also available to visitors on the shopping centers' websites.

ECE relies on internationally recognized certification systems to transparently present information on the quality of its buildings with respect to sustainability aspects. This includes certification by the German Sustainable Building Council (DGNB), which is awarded to both new buildings and buildings already in use. The certification system adopts a holistic approach, that covers not only environmental, but also social, economic, and technical criteria. Depending on the degree to which the building fulfills the DGNB's criteria, certification is awarded in bronze, silver, gold, or platinum. In addition to DGNB certification, ECE also relies on BREEAM certification for existing buildings and for buildings in other European countries. BREEAM is a certification system for buildings that is widely used on an international scale. In the BREEAM system, projects receive ratings that range from Pass, Good, Very Good, Excellent, to Outstanding. //

IMPACT ON HEALTH AND SAFETY

When constructing every new building and carrying out every major refurbishment, ECE assesses the potential for improvement in terms of sustainability. If possible, it has the positive performance of its buildings confirmed via recognized certifications. At the end of the reporting period, 58 of ECE's shopping centers, plus the basic

certificate not applicable to any particular location, had been awarded a main or pre-certificate from the German Sustainable Building Council (DGNB) or had been awarded BREEAM certification. They guarantee that in addition to energy efficiency and other environmental aspects, sociocultural aspects have also been taken into account.

CERTIFICATES RECEIVED IN 2020

Shopping

Special properties and districts



		
SILVER	GOLD	PLATINUM

+1 BASIC CERTIFICATE



			
BRONZE	SILVER	GOLD	PLATINUM



	
VERY GOOD	EXCELLENT



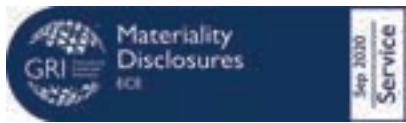

GOLD



	
SILVER	PLATINUM

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GRI CONTENT INDEX



This report was submitted to the GRI for review by the GRI Materiality Disclosures Service. The GRI Services team has confirmed that the materiality disclosures (GRI 102-40 – 102-49) are correctly positioned in the report.

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Disclosure	Page number/URL	Comment/omission
GRI 101: Foundation 2016		
GRI 102: General Disclosures 2016		
102-1 Name of the organization		ECE Projektmanagement G.m.b.H. & Co. KG
102-2 Activities, brands, products, and services	pp. 3, 90 - 91	
102-3 Location of headquarters		Hamburg
102-4 Location of operations	p. 90	Subsidiaries
102-5 Ownership and legal form	p. 90	G.m.b.H. & Co. KG
102-6 Markets served	p. 90	Subsidiaries and joint ventures
102-7 Scale of the organization	pp. 90 - 91	
102-8 Information on employees and other workers	p. 94	
102-9 Supply chain	p. 96	
102-10 Significant changes to the organization and its supply chain		No changes
102-11 Precautionary principle or approach	pp. 96, 98	
102-12 External initiatives	p. 100	
102-13 Membership of associations		Memberships
102-14 Statement from senior decision-maker	pp. 2 - 3	
102-15 Key impacts, risks, and opportunities	pp. 3, 72 - 73, 92	
102-16 Values, principles, standards, and norms of behavior	p. 98	
102-18 Governance structure	p. 92	Management Board and Supervisory Board
102-40 List of stakeholder groups	p. 92	
102-41 Collective bargaining agreements	p. 94	
102-42 Identifying and selecting stakeholders	p. 92	
102-43 Approach to stakeholder engagement	p. 92	
102-44 Key topics and concerns raised	pp. 92 - 93	
102-45 Entities included in the consolidated financial statements		Subsidiaries and joint ventures
102-46 Defining report content and topic Boundaries	pp. 92 - 93	
102-47 List of material topics	pp. 92 - 93	
102-48 Restatements of information		No restatements
102-50 Reporting period	p. 93	2018 - 2019

Disclosure	Page number/URL	Comment/omission
102-51 Date of most recent report		March 2018
102-52 Reporting cycle		Biannual
102-53 Contact point for questions regarding the report	p. 106	
102-54 Claims of reporting in accordance with the GRI Standards		The sustainability report was prepared in accordance with the GRI Standards using the "Core" option.
102-55 GRI content index	pp. 102 - 105	
102-56 External assurance		None

Material topics

GRI 205: Anti-Corruption 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)	p. 98	
205-2 Communication and training about anti-corruption policies and procedures	pp 98, 99	
GRI 302: Energy		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)	pp. 72 - 75, 96	
302-1 Energy consumption within the organization	p. 96	
GRI 303: Water 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)	p. 97	
303-1 Water withdrawal by source	p. 97	
GRI 305: Emissions 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)	pp. 72 - 73, 92, 96	
305-1 Direct (Scope 1) GHG emissions	p. 96	
305-2 Energy indirect (Scope 2) GHG emissions	p. 96	
305-4 GHG emissions intensity	p. 97	
305-5 Reduction of GHG emissions	p. 76	
GRI 306: Effluents and Waste 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)	p. 97	
306-2 Waste by type and disposal method	p. 97	
GRI 401: Employment 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)	pp 84, 87	
401-1 New employee hires and employee turnover	pp 94, 95	
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	p. 94	
401-3 Parental leave	p. 95	

GRI 403: Occupational health and safety 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)		p. 87
403-2: Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities		With the exception of the information in section 7 (p. 95), no other data is available.
GRI 404: Training and Education 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)		pp 84, 85
404-1 Average hours of training per year per employee		p. 84
404-2 Programs for upgrading employee skills and transition assistance programs		pp 84, 85
GRI 413: Local Communities 2016		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)		p. 78
413-1 Percentage of operations with implemented local community engagement, impact assessments, and/or development programs		pp. 46, 71, 79 - 80
GRI 416: Customer health and safety		
GRI 103: Management Approach 2016 (including 103-1, 103-2, 103-3)		pp. 6 - 9, 101
416-1 Percentage of significant product and service categories for which health and safety impacts are assessed for improvement		pp. 6 - 9, 101

