

SUSTAINABILITY REPORT

BOARD STATEMENT

The Board is pleased to present the second Sustainability Report (“the Report”) of Intraco Limited and its subsidiaries (“Intraco” or “the Group”). This Report is a culmination of the Group’s commitment towards incorporating sustainability into its business operations through the presentation of economic, environmental, social and governance (“ESG”) performance throughout the year.

Building on last year’s materiality assessment findings, the Group conducted this year’s review by focusing on the most pressing ESG issues impacting the business and its stakeholders. The Group has put in place stronger controls and processes to manage the material ESG factors, which in turn demonstrate Intraco’s commitment to sustainability and addressing its stakeholders’ primary concerns.

Corporate governance remains an area of priority. Due to the Group’s ongoing efforts to promote greater transparency, governance and integrity, Intraco has risen up the rankings in the latest publication of the Singapore Governance and Transparency Index (“SGTI”) 2018 from 295 to 83. These efforts include enhancing the information available on the website, maximising transparency in its Annual Report and professionalising investor relations communications. SGTI is a leading index-survey conducted annually by NUS Business School (Centre for Governance, Institutions and Organisations, CGIO) to assess the quality of corporate governance practices for all Singapore-listed companies.

The Board oversees the sustainability efforts of the Group and determines the ESG factors material to the Group. Other responsibilities of the Board include incorporating ESG elements into the strategy formulation process and integrating them into the Group’s daily business operations across all entities.

In FY2018, the Board approved the Terms of Reference (“TOR”), which sets out the Sustainability Steering Committee’s (“SSC”) objectives and responsibilities in relation to sustainability matters including:

- The development and regular review of the sustainability vision, mission and strategy;
- The development and review of the sustainability framework;
- The development, review and implementation of the Group’s sustainability policies, practices and initiatives;
- The development of the annual Sustainability Report;
- Regular reporting to Board on sustainability-related matters; and

- Managing and escalating, if needed, any other sustainability-related matters.

The Sustainability Task Force (“STF”) assists the SSC in driving the sustainability programme at Intraco.

ABOUT THIS REPORT

The Report presents Intraco’s commitment, governance, sustainability policies, performance and targets in managing the ESG factors during the financial year 1 January 2018 to 31 December 2018. This Report complies with SGX Listing Rules 711A and 711B and refers to the Global Reporting Initiative (“GRI”) Standards 2016. The sustainability framework adopted by the Group will be reviewed every 12 months. The Report references the following GRI disclosures:

- Disclosure 201-1 (a) from GRI 201: Economic Performance 2016;
- Disclosure 302-3 (a-d) from GRI 302: Energy 2016;
- Disclosure 307-1 (b) from GRI 307: Environmental Compliance 2016;
- Disclosure 403-2 (a) from GRI 403: Occupational Health and Safety 2016;
- Disclosure 404-1 (a) and 404-2 (a) from GRI 404: Training and Education 2016;
- Disclosure 405-1 (b) from GRI 405: Diversity and Equal Opportunity 2016;
- Disclosure 414-1 from GRI 414: Supplier Social Assessment 2016;
- Disclosure 416-2 (b) from GRI 416: Customer Health and Safety 2016; and
- Disclosure 419-1 (b) from GRI 419: Socioeconomic Compliance 2016.

This Report considers the key business activities and the associated sustainability concerns. The following entities which are based in Singapore are covered in this Report:

- Intraco Trading Pte Ltd (“Intraco Trading”);
- Intrawave Pte Ltd (“Intrawave”); and
- K.A. Group Holdings Pte Ltd and its subsidiaries (“K.A. Group”).

Intraco is fully committed to engaging its stakeholders and welcomes feedback on this Report and any aspects concerning its sustainability. Please send your comments and suggestions to admin@intraco.com because engaging with each of you is essential to operating Intraco’s business responsibly.

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SUSTAINABILITY APPROACH

Intraco's sustainability approach is based on its long-term commitment to create value for its stakeholders and achieve sustainable growth. The Group continues to grow and diversify its businesses whilst consistently ingraining corporate responsibility and sustainability across every aspect of its business.

To build a sustainable business, the Board and Management make business decisions guided by its core values of integrity, trustworthiness, teamwork, performance, passion and professionalism. Sustainability is part of the Group's strategic priorities and Management works collaboratively with its stakeholders to identify their concerns and key business issues. Intraco believes that proactive management of ESG risks and opportunities can help deliver better performance and strengthen the relationship with stakeholders.

STAKEHOLDER ENGAGEMENT

The Group's stakeholders play an important role in its sustainability journey. Intraco's vision and the success of its business is closely aligned with the interests and requirements of its key stakeholders. The Group identifies and engages its various stakeholders in order to have a better understanding of their concerns relating to the business.

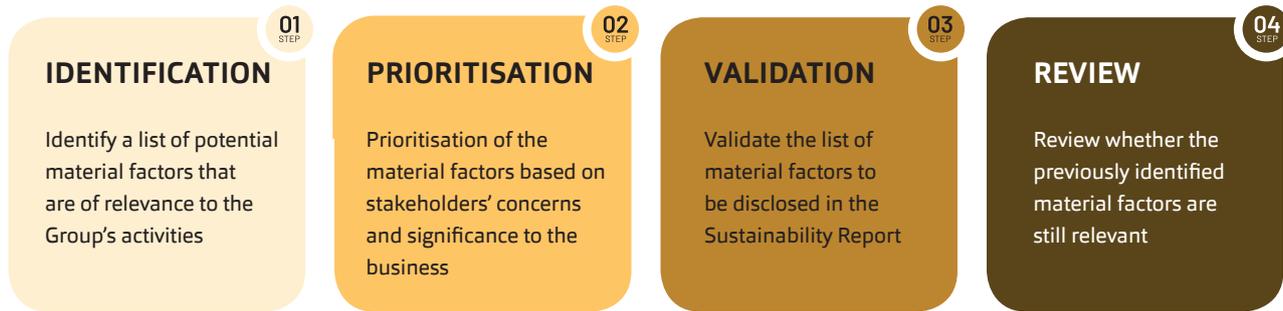
These key stakeholders include customers, suppliers, employees, investors and regulators. The Group adopts both formal and informal channels of communication to understand the needs of key stakeholders, and incorporate these into its corporate strategy.

Stakeholder Group	Key Topics and Concerns	Engagement Methods	Frequency
Customers	<ul style="list-style-type: none"> Customer Health and Safety Pricing and quality of products and services 	<ul style="list-style-type: none"> Frontline interaction by sales managers Email queries Contact form on company website Customer feedback 	When applicable
Employees	<ul style="list-style-type: none"> Training and Education Personal development Work environment Fair compensation and benefits 	<ul style="list-style-type: none"> Open dialogue among teams Training and development programmes Employee social events Employee feedback mechanism 	Regularly
Shareholders	<ul style="list-style-type: none"> Economic performance Shareholders' returns 	<ul style="list-style-type: none"> Annual General Meeting Annual Report SGX Corporate Announcements Company website Press releases 	Periodically
Suppliers	<ul style="list-style-type: none"> Product quality requirements Certificate of Analysis requirements 	<ul style="list-style-type: none"> Face-to-face meetings Supplier assessment 	Periodically
Government and Regulators	<ul style="list-style-type: none"> Compliance with SGX Listing Rules Fair market practices Regulatory and Legal compliance 	<ul style="list-style-type: none"> Meetings and consultations Regular reports 	Periodically

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MATERIALITY ASSESSMENT AND REVIEW

The Group’s materiality assessment begins with a systematic process to identify, prioritise and validate the ESG factors that balance between business perspectives with that of its stakeholders.



Intraco conducted a materiality assessment in FY2017 in a workshop involving the SSC and the Board with the help of an external consultant.

This year, a materiality review was conducted based on the results of the previous year’s materiality assessment. Factors that were deemed material last year were reviewed to ensure their relevance. During the review this year, a new material factor, Acquisition, was identified in addition to the seven material factors.



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The material factors for this year are presented in the table below.

Category	Material Factors	Description	Detailed Information	Entities
Economic 	Economic Performance	Economic value generated by the organisation for its shareholders	Financial Review page 26 and Financial Statements, page 84 Sustainability Report, page 32	<ul style="list-style-type: none"> • K.A. Group • Intrawave • Intraco Trading
	Acquisition	Business growth through potential merger and acquisition activities and the due diligence process.	Sustainability Report, page 32	<ul style="list-style-type: none"> • K.A. Group • Intrawave • Intraco Trading
Environment 	Energy	Electricity usage for daily operations	Sustainability Report, page 32	<ul style="list-style-type: none"> • K.A. Group • Intrawave • Intraco Trading
Social 	Customer Health and Safety	Health & Safety considerations for customers' policies for product and service quality control	Sustainability Report, page 33	<ul style="list-style-type: none"> • K.A. Group • Intrawave • Intraco Trading
	Supplier Social Assessment	Procurement practices to select suppliers who maintain quality and comply with regulatory requirements	Sustainability Report, page 34	<ul style="list-style-type: none"> • K.A. Group • Intrawave • Intraco Trading
	Occupational Safety	Address and mitigate occupational safety risks through policies and safety trainings	Sustainability Report, page 34	<ul style="list-style-type: none"> • K.A. Group • Intrawave
	Employees' Well-being ¹	Employees' well-being, training and education as well as a positive and conducive workplace environment	Sustainability Report, page 36	<ul style="list-style-type: none"> • K.A. Group • Intrawave • Intraco Trading
Governance 	Compliance with Laws and Regulations	Compliance with local legislations	Corporate Governance Report, page 41 Sustainability Report, page 37	<ul style="list-style-type: none"> • K.A. Group • Intrawave • Intraco Trading

¹ Employees' Well-being is mapped to the GRI factor Training and Education

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ECONOMIC

Economic Performance

Intraco strives to achieve an inclusive growth for the Group, shareholders, employees and society at large and in doing so, grow in an ethical and responsible manner. Strong economic performance enables the Group to continue delivering sustainable dividends to investors, providing rewards to employees and gaining confidence from stakeholders.

Intraco believes that strategic growth plans coupled with sound financial management processes are key to delivering sustainable economic performance. In 2018, Intraco has implemented a number of initiatives that contribute to the long-term sustainability of our businesses, including:

- Embarking on a new North East MRT Line ("NEL") Extension Project;
- Setting up a representative office in Indonesia for the trading business with new hires of local employees. This initiative received the endorsement and a grant from Enterprise Singapore;
- Looking into establishing trading opportunities in China and Australia;
- Formulating plans to restart operations through its Wholly Foreign-Owned Enterprise ("WFOE") in Shanghai;
- Increasing marketing efforts for the fire-proofing products and services under the K.A. Group in the region including Vietnam, Myanmar and Malaysia;
- Improving cash and working capital management to minimise cost and maximise returns; and
- Introducing and implementing better cost control and cost management measures.

Despite the weak market conditions and tough business environment, Intraco continued its effort to drive further improvement in financial returns through proactive management of its investments across the businesses. The Group grew its revenue by 26.8%, increased its profit after tax by 21.3% and achieved 23.6% corporate cost savings in FY2018. The Group also maintained a strong balance sheet

with an increase of 32.3% in cash and cash equivalents at the end of 2018 compared to 2017. Looking ahead, the Group will continue its strategy to expand its businesses into new markets and review its investment portfolio constantly.

For more information on economic performance, please refer to the Operations and Financial Review and Financial Statements of this Annual Report.

Acquisition

Acquisition was identified as a material factor to align with the Group's business strategy, including focus on quality and business growth. Besides identifying organic growth opportunities, the Group is continuously on the lookout for new Merger and Acquisition ("M&A") and partnership opportunities. The Board and Management actively review its portfolio of investments with a view of establishing the right time to unlock maximum value for all shareholders.

Potential M&A opportunities that have been assessed by the Management and met the criteria set by the Investment Committee ("IC") are presented to the IC for evaluation and approval. The IC provides advisory support to the Management for all M&A as well as other capital investment and financial commitment matters. Due diligence is mandated and performed by an external service provider on both legal and financial aspects. Intraco recognises that the way a company handles ESG issues can affect its long-term performance and its valuation and will consider ESG assessment as part of the due diligence for any future potential targets.

ENVIRONMENT

2018 was announced as the Year of Climate Action by the Ministry of Environment and Water in Singapore. Intraco is committed to play its part in this initiative through reducing its energy consumption and carbon footprint.

Energy

The Group's primary environmental impact lies in its energy consumption in the form of electricity usage. The efforts at reducing energy consumption include enhancing its infrastructure, monitoring and reporting on energy consumption as well as increasing employees' awareness on the significance of energy reduction.

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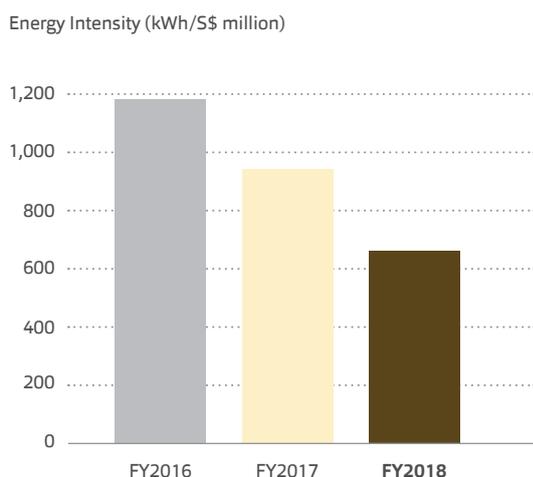
In the OG Albert Complex that houses Intraco’s Singapore office, it has maintained its Building and Construction Authority (“BCA”) Green Mark Gold certification. During the year, Intraco has enhanced its IT infrastructure to reduce the environmental footprint. This was achieved through regular maintenance and annual servicing of equipment and gradual phasing-out of old notebooks and desktops. Other forms of infrastructure enhancements which Intraco adopted include the practice of using more energy efficient facilities such as air-conditioners that are certified under the Singapore Energy Labelling Scheme or equivalent Certificate of Performance (“COP”). Occupancy sensors and LED lights have also been installed to reduce energy consumption.

Electricity from the local power grid is used for the operations of equipment, air-conditioning and lighting. These utilities usage are monitored and reported to management monthly.

The Group has put up reminders of energy conservation practices such as switching off lights and equipment when not in use, to encourage employees to play their part in reducing energy consumption.

Through the aforementioned energy consumption initiatives, the energy intensity in FY2018 has reduced 28% compared to the previous year as presented in the chart below:

Table 1a. Intraco Energy Intensity²



² The total energy consumption includes electricity consumption from all 3 entities – Intraco Trading, Intrawave and K.A. Group. The electricity consumption for Intrawave excludes electricity consumption at the North East MRT line Telecom Equipment Room as it is under the control of mobile operators. The electricity consumption of Intraco Trading and Intrawave is calculated based on gross floor area allocation in the shared office including the common areas.

The Group’s target for the following year is to maintain a yearly reduction in energy intensity and continue to monitor energy consumption and identify initiatives to reduce electricity consumption across all operations.

SOCIAL

Product Responsibility

Customer Health and Safety

The Group places emphasis on safeguarding the health and safety of its customers. In doing so, all health and safety risks are minimised and addressed not just within the Intraco group of companies but to its supply chain as well. The Group’s philosophy is to do things right the first time, and this has been implemented in relation to customers’ health and safety through compliance with relevant regulations.

K.A. Group

K.A. Group ensures that it adheres to the relevant health and safety industry-specific regulations by conducting regular quality control checks on its products and services. The K.A. Fireproofing Pte Ltd’s environmental management system has obtained ISO 14001:2015 certification by Certification International Singapore for the scope of supply and installation of fireproofing system to building and constructions site, along with the production and storage of fireproofing materials.

Intraco Trading

Intraco Trading (“ITPL”) conducts regular quality control checks on the products and services that it provides to its customers. In addition, ITPL continues its practice of obtaining a Certificate of Analysis (“COA”) from all of its suppliers.

For trades that require a more robust check, ITPL seek to obtain additional documents such as Europe ROHS Standards, REACH and US FDA for certain applications to provide the additional assurance for such products and to fulfil clients’ requirements.

ITPL takes a proactive role to go beyond requirements relating to the safety of its products. Apart from renewing the required licences, ITPL also takes the onus to educate its clients on the proper use of products and also warn them of any potential health and safety risks

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and precautions that they should undertake to minimise potential incidents related to its customers' health and safety, through trainings and/or manuals. Additionally, ITPL engages its clients to obtain feedback on health and safety related issues. This enables us to investigate identified issues and improve upon them.

In the course of business, ITPL also makes an effort to promote recycle materials in the fast-moving consumer goods ("FMCG") market segment.

During this reporting period, there were zero incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services. The Group aims to maintain this performance the following year.

Supplier Social Assessment

Maintaining the quality and safety of its products and services is quintessential to the success of Intraco's business. Thus, the Management's efforts to ensure product and services safety extend beyond the Group and to its suppliers. The Group conducts procurement assessment on its suppliers, prioritising quality and regulatory compliance as key considerations when assessing supplier social performance.

K.A. Group

K.A. Group has in place a master list of all its suppliers. The K.A. Board approves the engagement of new suppliers that are above S\$1 million. As a means of monitoring the quality of its products, all direct materials are checked for relevant certifications upon arrival. This year, 45% of new suppliers were screened. The remaining suppliers were not assessed as they were not deemed material. K.A. Group strives to screen more suppliers in future.

Intraco Trading

As a trading company, it is imperative to maintain the quality of its products so that ITPL is deemed trustworthy by clients. This is ensured as all suppliers are required to obtain a COA for quality assurance. Intraco is currently adopting a phased approach of developing a list of social criteria to assess major suppliers.

In 2018, all ITPL suppliers have obtained a COA. ITPL aims to continue the practice of purchasing materials from major suppliers with COA.

EMPLOYEES

Occupational Safety

Employees are Intraco's most important asset and are critical in achieving success for the business. Creating a safe and conducive environment for employees to work in will allow employees to feel at ease and thus enable them to perform at their best. The nature of Intraco's businesses pose several safety risks to its employees and precautionary measures are taken to minimise these risks through policies and processes.

The Group has an Occupational Health and Safety Policy Manual as well as an Office Safety and Security Manual which are provided to all employees. These manuals are updated and revised based on any changes to the Ministry of Manpower's regulations or any associated regulations, and feedback received from employees. The Group has in place an annually reviewed Operational Risk Framework and Contingency Plan or Emergency Manuals to ensure operations can be resumed with minimal disruption in the event of unexpected and adverse events.

As a means of ensuring the safety of the workplace, regular checks are conducted to identify any areas of potential risks. Safety inspections are conducted on equipment to make sure that they are in sound condition.

Intraco has in place an incident reporting system that encourages communication and discussions about occupational safety issues. The Group believes that ensuring safety is a dynamic process and maintaining a robust and proactive incident reporting system is crucial in achieving that. In case of emergency, first aid boxes and Automated External Defibrillator and Cardiopulmonary resuscitation ("AED + CR") machines are readily available in the office. When applicable, the Group provides workplace injury compensation for work accident occurred at work.

K.A. Group

At K.A. Group ("KA"), safety is ingrained in the company's core value. The company strives to maintain a safe work environment for its employees. K.A. Group has set in place a Quality, Operational Health and Safety and Environmental ("QOHSE") policy that specifies compliance with all local health and safety requirements. Supervisors are responsible in ensuring safety equipment are in place for employee on-site. All site workers and supervisors are

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K.A. Group (continued from previous page)

required to attend Workplace Safety Orientation (“WSOC”), a 2-day mandatory government course, before they are allowed to work at construction sites. Additionally, safety consciousness is permeated throughout the K.A. Group through regular briefings, daily checks, safety posters and a zero-tolerance towards safety accidents. Safety equipment on site and personal equipment are checked on a daily basis.

K.A. Group continues to be certified for its safety efforts as stipulated below:

- Lloyd’s Register Quality Assurance to Quality Management System Standards ISO 9001:2008 for the provision of passive fire protection application services for building and steel structures.
- SS506 Part 1:2009 and BS OHSAS 18001:2007 for the scope of supply and install of fireproofing system to building and construction, production and storage of fireproofing materials by Certification International Singapore for K.A. Fireproofing Pte Ltd’s occupational safety & health management system.
- bizSAFE Level Star Certificate by the Workplace Safety and Health Council.
- Complied with BCA Contractors Registration System (“CRS”) requirement for Fire Prevention and Protection Systems.

Table 2a. K.A. Group workplace injuries and fatalities



Intrawave

Intrawave specialises in the design and building of radio coverage infrastructure for telecommunication operators and hence safety is important for Intrawave. Intrawave is in compliance with all local health and safety requirements while sub-contractors are engaged to do periodic maintenance of equipment. Employees, sub-contractors and customers are provided health and safety training courses.

Due to the nature of its work with Singapore’s North East MRT line (“NEL”), the Group’s employees working on NEL are required to pass training courses conducted by SBST (“NEL Operator”) or training refresher course conducted once every three years. SBST’s approval on risks identification/assessment and control of any health and safety risk were also obtained before work commences in NEL. To enhance compliance with these regulatory requirements and attain long-term integrity from stakeholders, the Group has its own Engineering person in-charge (“EPIC”) and Track Protection Officer (“TPO”) qualified by SBST and will be responsible for the safe and efficient execution of engineering works in the NEL premises.

Overall, in 2018, the Group has achieved its target of maintaining zero workplace fatalities or permanent disabilities, zero workplace injuries and zero significant incidents of non-compliance resulting in regulatory breaches under the Workplace Safety and Health Act. Intrawave aims to continue to maintain the same performance next year.

Table 2b. Intrawave workplace injuries and fatalities



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Employees' Well-being

Intraco's employees' invaluable skills, knowledge and experience has enabled the Group to achieve the stellar results thus far. The Group believes in equipping its employees with the relevant knowledge and skill to enhance business performance. This includes building a company culture that is centred on each employee's well-being and development.

Employees' Benefits and Welfare

The Board and Management want all employees to enjoy a positive working environment by providing them with benefits and welfare initiatives that enhance their health and social wellness.

The Group initiated a policy of purchasing insurance for both personal accident insurance and group term life insurance for all employees this year. These insurance policies are reviewed and renewed annually by the Human Resource department depending on the adequacy of the coverage for employees.

The Group provides all of its employees with medical benefits and leave, including Maternity Leave and Paternity Leave as well as medical and dental insurance.

As a means of providing a healthy work-life balance for its employees, Management invites external vendors to conduct inspirational seminars on topics such as positive thinking. Emphasis on out-of-hours social activities is another initiative that the Group have set in place for all employees.

To facilitate team-building and demonstrate staff appreciation, the Group held celebrations on special occasions such as Chinese New Year, Hari Raya and Deepavali. Additionally, the various divisions organised regular team lunches to celebrate small wins or welcome new joiners. There were regular lunch gatherings meals and events organised during the year to create a positive work environment. A blood donation drive was also organised to give back to the community.

Training and Education

Knowledge is key as the Group navigates this ever-changing business landscape. Intraco's employees are provided with equal opportunities and their learning and development experiences are based on their respective strengths and needs to achieve their career goals and

reach their fullest potential. The Group encourages its employees to attend trainings and expand their exposure through job rotation and job enlargement to stay ahead of the competition.

In 2018, the Group's employees received an average of 7.18 hours of training each. Intraco's employees are provided with technical training on topics such as corporate tax planning, financial reporting, financial statements and Government and Service Tax ("GST"). Trainings on soft skills such as presentation skills, Microsoft Excel reporting skills and writing impactful business correspondence are provided for all employees. Intraco's management staff attend external seminars and conferences such as Corporate Governance Code Briefing and SID Directors' Conference 2018. In the year ahead, the Group aims to continue providing all employees with equal opportunity and access to relevant trainings according to their learning needs and career goals.

Positive Workplace Environment

The Group understands the importance of a positive workplace environment on employees' behaviour and sense of belonging. The Board and Management promotes such culture through regular engagement with all employees.

The Board and Management organised a Strategy Session in July 2018 to review the strategy and long-term direction of the Group. The Board also organised a Corporate Governance and Compliance session in May 2018 to align and reinforce organisation goals, vision and core values. There was regular staff engagement including monthly team meetings and 1-to-1 conversations, to keep employees informed on the latest updates, align goals and continuously establish ways to improve the organisation.

The Board and CEO focused on aligning performance with incentivisation and setting clear KPIs and growth targets. Data such as employee turnover and absence rate, number of training days etc. is monitored to help us better grasp employee morale. HR conducts exit interviews for all voluntary cessation of service amongst valued employees. Furthermore, the annual 360-appraisal process and regular feedback process allows Management to gain a better understanding of each employee's strengths and weaknesses as well as assess their fit with the working culture within their respective departments.

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GOVERNANCE

Compliance with Laws and Regulations

Intraco believes in achieving strong corporate governance whilst operating with a high level of integrity and ethics. As a responsible corporate citizen, the Group is compliant with the laws and regulations as presented below.

Employment Act

The Group abides by the requirements in the Employment Act, including the welfare of employees, CPF contributions, provision of paid annual leave and sick leave. Additionally, Intraco supports National Servicemen (“NSmen”) as they devote their services to Singapore’s national defence effort. Thus, the Group provides NSmen within the company flexible leave arrangement to accommodate such arrangements.

Employees are recruited solely based on their merits, such as skills, experience, ability, organisational and job fit. The Group’s Human Resource department ensures equal training and development opportunities for all regardless of their ethnicity, religion, gender, marital status or age.

Intraco aims to treat all employees fairly and with utmost respect and part of this effort is to ensure all employees are issued employment contracts that clearly stipulate their employment terms and conditions. In addition to abiding by labour laws, the Group adopts Singapore’s Tripartite Guidelines on Fair Employment Practices.

Anti-Child and Anti-Forced Labour

At Intraco, there is zero tolerance towards Child Labour and Forced Labour. Measures and efforts have been put in place to ensure that no unethical labour practices happen within the Group’s operations. To do so, the Group complies with Singapore’s Employment Act, Retirement Act, Workplace Safety and Health Act, and Factories Act.

In FY2018, there were zero incidents and grievances of child and forced labour reported. Intraco targets to continue to maintain zero incidents and grievances of child and forced labour being reported.

Diversity and Inclusiveness

The Group seeks to ensure diversity within its teams as it provides equal employment opportunities for all regardless of their ethnicity, religion, gender, marital status or age. The wealth of experience and skills that come along with a diverse team is important as it navigates the tumultuous business landscape. There was an increase in the percentage of female employees from 22% in FY2017 to 25% in FY2018. There is a recognition that there are certain sectors in the Group’s businesses, such as fire protection solutions businesses, which tend to attract larger proportions of male employees, due to the job nature.

Chart 1a. Percentage of employees by age group:

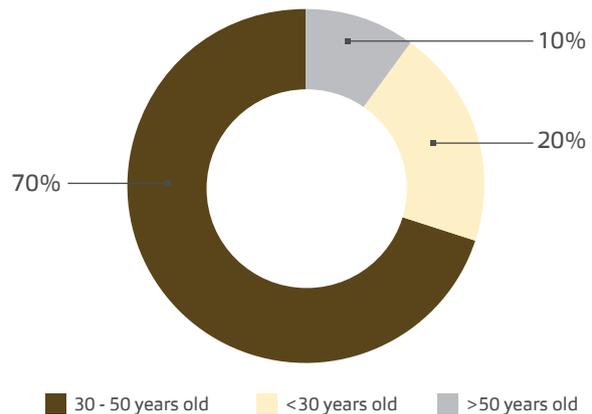


Chart 1b. Percentage of employees by gender

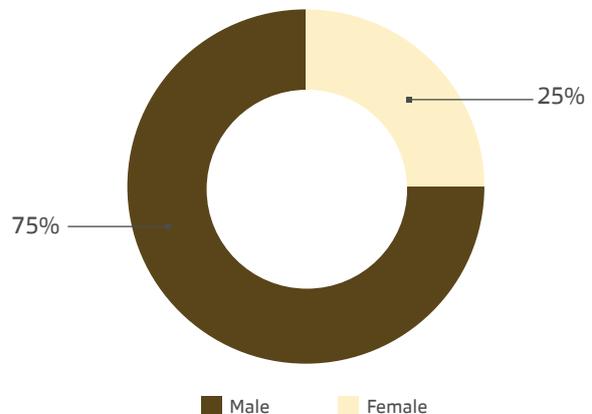


Chart 1c. Percentage of employees by employee category

