



SUSTAINABILITY REPORT

2019



TOP GLOBAL LIMITED

#18-02 Tong Building, Singapore 238862

Tel: +65 6746 4333 Fax: +65 6746 4948

Registration No.198003719Z

Sustainability Report

CONTENTS	Page
1. Board Statement	2
2. About this Report	3
3. Organisational Profile	4
4. Governance	6
5. Sustainability Approach	8
6. Economic Performance	10
7. Market Presence	12
8. Human Capital	13
9. Energy Management	15
10. Customer Privacy	15
11. Compliance with Laws and Regulations	16
12. Global Reporting Initiative (GRI) content index	17

Board Statement

Dear Esteemed Stakeholders,

We are pleased to present Financial Year 2019 Sustainability Report for Top Global Limited (the “Company” or “Top Global”, together with its subsidiaries, the “Group”) which outlines our continued commitment to societal initiatives and sustainable long term growth in all sectors of business that we currently focus on.

In 2019, we saw the second hottest year in recorded history, the United Nation warned that without unpresented efforts to decarbonised, the climate crisis would reach critical status by 2030¹. The year also saw strong efforts by local governments in Indonesia and Singapore to promote sustainable economic growth in construction by releasing expansionary budgets² aiming to improve connectivity and replace aging infrastructure with sustainable green developments.

As part of our commitment to sustainable and equitable growth to achieve long-term value creation for all our stakeholders, we do not only look at market profits, but also our impact on the environment, and other stakeholders. We aim to invest more resources in environmentally friendly business processes, local communities and continue our transparency to stakeholders in all our business dealings.

On behalf of the Board of Directors (the “Board”) and Management of the Group, we would like to acknowledge all stakeholders who have been with us and contributed to our sustainability journey. The Group is pleased to share that we have received international recognition for our sustainability and hospitality efforts, with our properties garnering several new accolades. Going forward, we would continue to put sustainability as an integral part of our properties, communities, polices and processes to secure the long-term interests of our stakeholders and sustain the performance of Top Global.

¹ <https://news.un.org/en/story/2020/01/1055392>

² https://www.singaporebudget.gov.sg/docs/default-source/budget_2019/download/pdf/fy2019_budget_statement.pdf

About this Report

Report Background

As an advocate for sustainable developments, the Company is a strong supporter of continuous advancements in sustainability and is delighted to demonstrate our progress in sustainability practices in relation to environmental, social and governance (“ESG”) through our annual sustainability reports.

We prepared the sustainability report with reference to the Global Reporting Initiative (“GRI”) Standards: Core Option, the latest set of standards issued by the GRI Global Sustainability Standards Board. This report is also prepared in accordance with Rule 711A and 711B of the Singapore Exchange Securities Trading Limited (“SGX-ST”) Mainboard Listing Manual and makes references to the guideline set out in SGX-ST’s Practice Note 7F Sustainability Reporting Guide.

The data and information provided within this report has not been verified by an independent third party and we have relied on internal checks and verification for accuracy.

Scope

This report covers the operations of the Group in Singapore and Indonesia. Unless otherwise stated, the data and performance as disclosed in this report cover the period from 1 January 2019 to 31 December 2019, which is in line with our financial year (“FY”) period.

Reporting Principles

The report is prepared in accordance with GRI Principles for defining report content, including:

Materiality	Focusing on issues that impact business growth and are of utmost importance to stakeholders;
Stakeholder Inclusiveness	Taking into key stakeholders’ concerns and responding to stakeholder expectations and interests;
Sustainability Context	Presenting performance in the wider context of sustainability; and
Completeness	Including all information that is of significant economic, environmental and social impact to enable stakeholders to assess the Group’s performance.

Accessibility

As part of our environmental conservation efforts to go paperless, the Group will not print any hard copy of this report. An electronic version of this report is available at: www.topglobal.com.sg.

Feedback

Top Global strongly encourages stakeholders to provide constructive feedback and suggestions on any aspects of the Group’s sustainability journey. Please address all feedback to <https://www.topglobal.com.sg/contact.html> to help the Group improve.

Organisational Profile

Organisation Background

Top Global was incorporated on 9 October 1980. Headquartered in Singapore, the Company was listed on SESDAQ (now known as Catalist) on 21 June 2001. On 24 December 2012, the Group successfully transferred to the Mainboard of SGX-ST.

The Group currently focuses on the following businesses.

Real Estate Development

We offer avant-garde projects and integrated support services in the region. The Group also owns a controlling stake in an Indonesian company – PT Suryamas Dutamakmur Tbk (“Suryamas”), listed on IDX Bursa Efek Indonesia since 1995. Suryamas is in real estate development of residential and commercial properties cum township. Together with Suryamas, the Group has completed numerous projects. These projects include The Quinn and The Maisons (R Maison and E Maison) in Singapore; Rancamaya Gold Estate, Harvest City and Royal Tajur in Indonesia. Top Global’s growth strategy is to explore joint ventures and collaborations with other real estate players in the region to expand its project and market presence.

Property Investment and Leasing

Going beyond its Real Estate Development business, Top Global has experience in managing a wide space of properties across the region, including but not limited to hostels, hotels, service apartments, co-living spaces, recreational facilities. The Group takes great interest and passion in injecting life into properties, believing that each property deserves its own identify and creative disposition. Furthermore, through our know-how and the use of a digital ecosystem, we help property owners optimize the true potential of their assets.

Smart Solutions

Top Global Smart Solutions business focuses on the hospitality industry. Our modular suite of technology solutions comes in services and applications that are seamlessly integrated, easy to implement, taking care of both front and back end operations. These solutions are targeted to help the under-served fragmented segment within the hospitality market to increase efficiency and productivity.

Recreation and Resort

Suryamas operates an international award winning Gold course in Bogor, Jakarta. It was designed by Ted Robinson in 1993. We also run a 4-star hotel and resort there. The Group sets to bring together contemporary luxury and serenity in a stunning setting that serves a mark of distinction from other resorts. It is still one of the country’s most prestigious golf and country club today. Top Global will continue to expand our footprint in Real Estate development and Smart Solutions, aiming to become one of the leaders in these segments.

Organisational Profile

Organisation Background (Cont'd)

The Group strives to deliver quality developments and efficient services, ensuring customer satisfaction, profitability and its growth. The Group also takes pride in inculcating its employees on the best management practices to reduce its environmental footprint through reduction in construction materials and wastage of materials. The Group is committed to integrate sustainability into its decision making processes to ensure that needs and concerns of various stakeholders are considered in the development of its corporate strategy. Sustainable business practices are promoted at workplace and dealings with suppliers and customers as the Group believes that enhancing sustainable values may at the same time enhances business performance.

Awards and Accolades

In addition to those awarded before 2018, the Group is proud to have garnered several new awards and accolades in FY2019 across multiple business segments.

1. R Hotel Rancamaya Golf & Resort nominated at 2019 Annual World Golf Awards for Indonesia's best Golf Course and Golf Hotel.
2. Royal Tajur's "Green Design" award by Green Property Awards in 2018 for the housing project integrate balance between residential, supporting facilities, commercial areas, mixed use and natural beauty.
3. R Hotel Rancamaya's "2018 Traveler's Choice Award" the highest honour bestowed by TripAdvisor.

Governance

Risk Management and Internal Controls

Supported by the Audit Committee (“AC”), the Board oversees the Group’s system of internal controls and risk management. The AC’s primary function is to support the Board in ensuring the integrity of financial reporting and providing assurance that there are appropriate checks and balances in place.

Comprehensive Standard Operating Procedures (“SOP”) for key business processes are distributed to employees as guidelines for employees to follow in minimising operational risks. These SOPs are reviewed and updated regularly as to keep up-to-date with industry best practices.

The AC ensures that periodic independent internal audits are carried out on key business processes testing effectiveness and adherence to the SOPs and internal controls in place.

Supply Chain Management

At Top Global, we recognise that our businesses in properties development and hospitality industry have significant direct or indirect environmental and social impacts throughout our supply chain. We have a diverse group of suppliers. Our suppliers range from contractors, service providers, and suppliers of physical goods or services.

We believe in fair and transparency with our business practices, as reflected in our Group’s Procurement Policies which set clear guidelines on the selection process. We use a range of factors including portfolios, pricing, quality, sustainability concerns such as environmental impact of products or services, etc to evaluate the performance of suppliers. Our practice benefits all stakeholders as not only does this ensure that the Group receives quality goods and services at value for money, it also inculcates our suppliers in reducing environmental footprint throughout our supply chain, in particular our businesses in properties development and hospitality industry.

Progressing forward, the Group aims to continue engaging our key suppliers in exploring industry best practice, environmental friendly technology, and helping us to uphold our commitment to social and environmental responsibility.

Corporate Governance

It is Top Global’s commitment to conduct business activities in a transparent, ethical and sustainable manner. We will continue our fundamental approach in our commitment to maximise long term sustained economic returns for shareholders through sound and effective corporate business practices, and a prudent business risk approach.

The Group understands the importance of cooperating with regulatory bodies. Top Global has complied with the principles and guidelines set out in the Code of Corporate Governance 2018 and the Listing Manual of the Singapore Exchange Securities Trading Limited.

In line with industry best practices, Top Global promotes constructive dialog between stakeholders and provides avenues for stakeholders to raising their grievances. In addition to an open-door policy encouraging employees to consult with management, the Group has established and formalised a Whistleblowing Policy & Procedure which is available at our

Governance

Corporate Governance (Cont'd)

corporate website (http://www.topglobal.com.sg/whistleblowing_policy.html). A Whistleblowing Committee chaired by an independent director has been formed to investigate any whistleblower complaints relating to possible improprieties in matters of financial reporting and other matters. They will decide on the cases to be escalated to the Audit Committee and the Chairman of the Board of Top Global.

The Whistleblowing Committee consists of the following members:

Chairman	Members
Independent Director & Chairman of the Audit Committee	Chief Operating Officer Financial Director Internal Control Head Human Resource Director Finance Manager

The contact details of the Whistleblowing Committee are as follows:

Address : 302 Orchard Road, #18-02 Tong Building, Singapore 238862
Telephone : (65) 6746 4333
Email : whistleblowing@topglobal.com.sg

Sustainability Governance

It is the Group's priority to integrate sustainability into its businesses strategies and processes. Where possible, the Group incorporate sustainability considerations in its decision-making processes.

Our sustainability efforts are led by the Group's senior management who ensures that the Group's business objectives are in line with its commitments to sustainable development. Senior management is responsible for on-going communication to the Board.

The Group's senior management determined focus areas where the Group can have the greatest economic, environmental and social impact, as well as the areas that are most important to the Group's stakeholders.

The Group has taken efforts to seek the opinion of many stakeholders either in a casual or formal way. The Group aspires to understand the needs and expectation of the Group's key stakeholders and strive to build mutual beneficial relationships.

Sustainability Approach

Stakeholders Engagement



Top Global values all stakeholders as integral parts of our business. We work closely and regularly with our stakeholders, evaluate valid feedback, steer the Group’s business practices toward more progressive, environmentally friendly equitable goals.

Key Stakeholders	How to Engage Stakeholders	Key Topics
Employees	<ul style="list-style-type: none"> ❖ Informal gatherings ❖ Performance appraisals ❖ Corporate events ❖ Orientation and training programs. 	<ul style="list-style-type: none"> ❖ Target setting and skills development ❖ Staff morale and teambuilding ❖ Performance review ❖ Diversity in the workplace
Customers	<ul style="list-style-type: none"> ❖ Enquiry and feedback channels ❖ Customers satisfaction surveys 	<ul style="list-style-type: none"> ❖ Products quality assurance ❖ Sales quotation ❖ Post sales enquiry
Governments	<ul style="list-style-type: none"> ❖ Consultations ❖ Discussions with governmental agencies 	<ul style="list-style-type: none"> ❖ Regulatory Compliance ❖ Reporting deadlines ❖ Environmental initiatives
Shareholders	<ul style="list-style-type: none"> ❖ Announcements made in stock exchange portal ❖ Annual general meeting ❖ Annual reports 	<ul style="list-style-type: none"> ❖ Financial results ❖ Corporate governance practices ❖ Investor relations
Suppliers	<ul style="list-style-type: none"> ❖ Quotations ❖ Supplier evaluation 	<ul style="list-style-type: none"> ❖ Project enquiries ❖ Bidding criteria
Local Communities	<ul style="list-style-type: none"> ❖ Community outreach ❖ Feedback and enquiry channels 	<ul style="list-style-type: none"> ❖ CSR events ❖ Environmental concerns ❖ Noise concerns

Sustainability Approach

Material Topic Assessment

The selection of our material sustainability topics was conducted by engagement with our stakeholders. With expectations and concerns raised by our stakeholders, we conducted an internal workshop in discussing the relative materiality of each topics in economic, environmental and social aspects, by considering the impact on our businesses, as well as the level of expectation or concern raised by the stakeholders. We then plotted the topics on a materiality matrix, which was used to identify and prioritise our efforts. The assessment generated six material aspects that were identified as high importance for our stakeholders.

Topic	Relevance and Impacts	Mapped GRI Standards	Reference
Economic Performance 	Fulfilling the Board's duties to shareholders through sustained economic growth and returns.	GRI 201 – Economic Performance	<ul style="list-style-type: none"> Sustainability Report 2019 Page 10 Annual Report 2019 – Consolidated Statement of Comprehensive Income
Market Presence 	Hiring locals with living-wage jobs, uplifts local communities and strengthen the domestic economy.	GRI 202 – Market Presence 2016	<ul style="list-style-type: none"> Sustainability Report 2019 – Page 12
Human Capital 	Employees are our assets. Transparent and fair employment practices combined with attractive career advancement prospective ensures that we get and keep the best.	GRI 401 – Employment GRI 404 – Training and Education	<ul style="list-style-type: none"> Sustainability Report 2019 – Page 13
Energy Management 	Energy conservation initiatives to reduce carbon footprints which also reduce operational costs.	GRI 302 – Energy	<ul style="list-style-type: none"> Sustainability Report 2018 – Page 15
Customer Privacy 	Measures to protect customers' data and privacy	GRI 418 – Customer Privacy	<ul style="list-style-type: none"> Sustainability Report 2019 – Page 15
Compliance with Laws and Regulations 	Close monitoring and compliance with industry related laws and regulations	GRI 307 – Environmental Compliance GRI 419 – Socioeconomic Compliance	<ul style="list-style-type: none"> Sustainability Report 2019 – Page 16

Sustainability Topics

Economic Performance

Financial Highlights

Summary of Results	Financial Year	
	2018	2019
Revenue	S\$79.8 million	S\$58.4 million
Gross Profit	S\$33.5 million	S\$30.2 million
Other Gains	S\$4.6 million	S\$11.6 million
Net Profit	S\$1.8 million	S\$5.4 million

Decrease in revenue from sales of Singapore development properties combined with an expired hostel lease in Singapore were major factors in the Group's decreased revenue by S\$21.4 million or 26% for FY2019.

The Group's gross profit for FY2019 decreased by S\$3.4 million, but the gross profit margins was higher compared to FY2018. The increase in gross profit margin was mainly due to higher profit margin obtained from sale of development properties in FY2019 compared to FY2018.

Regarding other gains, the Group recorded a strong showing, increasing the gains 150% amounting to S\$7 million. These gains were largely attributable to gain on bargain purchase of S\$7.7 million recognised on the acquisition of subsidiaries, and partially offset by a decrease in fair value gain recognised on financial assets.

The Group achieved a 3-fold increase in net profit for FY2019 when compared to FY2018. This translate to an increase of S\$3.6 million from S\$1.8 million in FY2018 to S\$5.4 million in FY2019. This significant increase can be largely traced to income tax expenses decreasing by S\$4.4 million in FY2019 from S\$2 million over provision of tax, absence of S\$1 million under provision of tax expenses from prior years, a S\$ 1.1 million decrease in current income tax, and S\$0.3 million in tax provision.

Subsequent Reporting for 2020

The start of 2020 has seen a harsh blow dealt to the tourism sector globally with the outbreak of the Covid-19 resulting in travel restrictions and quarantine orders implemented in many countries. This will undoubtedly severely impact the Singapore and Indonesia economies with the hospitality sector likely to bear the brunt of it. The property development sector was also affected due to the restrictions greatly reducing the number of foreign workers allowed to enter the country. The Group will continue to monitor the situation closely and make careful decisions with regards to businesses concerns.

The Group plans to increase focus in the following areas for further growth and development:

- Real estate development: The Group hopes to continue generating profits in subsequent years by closely monitoring the opportunities arising in relation to the overall

Sustainability Topics

development plans of our residential projects in Rancamaya, Royal Tajur and Harvest City respectively.

- **Recreation and Resort:** The Group strives to minimise the financial impact which is expected to bring on to the Group's golf and country club and hotel operations in Indonesia in near future, by continues to monitor the global situation regarding Covid-19 and develop alternative business solutions to mitigate the impact.
- **Smart Solutions and Property Investment and Leasing:** The Group plans to capitalise on the potential opportunity where hotels in Singapore are expected to take advantage of the lull period to carry out upgrading work and be prepared for the upturn. The Group strives to see the increase of revenue contribution in these segments by continue innovating and developing eco-friendly application solutions that help conserving resources at hospitality industries and properties managed by the Group.

Sustainability Topics

Market Presence

The Group has a significant presence in both Singapore where we are headquartered and Indonesia where we have a significant operations presence there with multiple current ongoing property development projects.

The communities in which we operate in, are the cornerstone of the Group. Without their support we would not be where we are currently. We follow a merit-based non-discriminatory policy, hiring from the local community whenever possible. The Group also demonstrates our commitment to our employees by providing them with more than just an equitable living wage. The Group also provides employees with safe working environments, and ample opportunity for career advancement.

Our employees at Singapore are all paid fair wage in accordance with the Ministry of Manpower's regulatory requirements. As an employer, we have been fulfilling our obligations in making statutory Central Provident Fund ("CPF") contributions in a timely manner.

Indonesian employees, which accounts for over 90% of the Group's workforce, have their salaries benchmarked against Indonesia's minimum wage as the baseline. Being merit based, the Group pays employees based on performance, qualification, skills, and experience. The Group also gladly contributes to Badan Penyelenggara Jaminan Sosial ("BPJS"), Indonesia's social security which covers employees' insurance, old age benefits, pensions and healthcare.

Whenever possible, the Group values promoting from within the local community. This is demonstrated with the majority of senior management in both Singapore and Indonesia being sourced from the local community. We have kept to our commitment of empowering the local community by increasing the number of local senior management staff in Singapore from 9 (90%) to 13 (81%), and in Indonesia 100% of the Group's senior management staff are local, a continuation from FY2018 reporting.

Subsequent Reporting for FY2020

The Group plans to continue with our merit base approach of hiring from the local community. The Group is also exploring ways to collaborate with local and online employment agencies to increase outreach to local communities regarding career opportunities.

Sustainability Topics

Human Capital

Employment Policy

Meritocracy is key not only in hiring but retaining top talent at Top Global. The Group is transparent in communicating with employees the expectations the Group has of them and their key performance indicators. These performance indicators were carefully crafted to be objective, measurable and in line with Top Global's business goals. All employees undergo annual performance review with respective superior, to better understand areas that they excel in and areas for improvement in order to achieve career progression.

Employee Benefits

The Group supports employee's mental and physical wellbeing through promoting family centric work-life balance integration for fulltime employees. In addition to leave benefits mandated by governmental regulations, the Group goes above and beyond by encouraging employees to utilise additional welfare benefits such as compassionate, paternity and childcare leave provided to them. In FY2019, 3 male employees and 10 female employees were entitled to parental leave and all have taken the entitled parental leave. All the employees returned to work after the parental leave ended. The return to work rate was 100% for both gender and retention rates of employees that took parental leave were 100% for male and 100% for female.

Training and Development

The Group advocates for employees to continuously cultivate their thirst for knowledge and skill development. During FY2019, management organised a slew of training programs available for employees to attend, including and not limited to Applied Revenue Management in Hotel Industry, Leadership Development Program, Presentation and Conduct Effective Meeting, Negotiation and Personal Evaluation, and Working Culture and Motivation.

All new employees are also mandated to attend training programs and workshops designed to familiarise them with the working environment, culture, equipment and applications at their disposal. This facilitates new employees in better understanding the Group's business objectives and provides trainings on proper workplace health, safety and operations requirements.

The Group also supports employees who decide to undertake external training courses to develop their skills and knowledge, through a reimbursement fund employees can apply to.

Throughout FY2019, each employee accumulated an average of 8 hours of training, similar to the 8 hours of training per employee recorded in FY2018.

Employee Code of Conduct

Within the employee handbook is a set of Employees Code of Conduct that all employees have agreed to adhere by upon joining us. The Code of Conduct is comprehensive, covering anti-discrimination, anti-corruption and workplace harassment policies. The Group has also established and communicated a framework that provides avenues for employees to voice their grievances and concerns. On top of the direct channels of communications available,

Sustainability Topics

employees were educated on the Group's Whistleblowing Policy, as an additional avenue to report more serious incidents securely, and without fear of reprisal from direct supervisors.

Subsequent Reporting for FY2020

The Group is committed to ensuring that employees have transferable skills and are adaptable to rapidly changing challenges of the modern era. We will be reviewing training programs and training funds available to employees and updating them as we see fit. During the much impacted Covid-19 situation, we strive to maintain operational and financial stability by reviewing remuneration and benefits of employee as well as alternative working arrangement.

Employee Statistic

Employee Turnover

Region	Female (FY2018)	Female (FY2019)	Male (FY2018)	Male (FY2019)
Singapore	23.57%	37.84%	30.52%	21.05%
Indonesia	12.00%	32.75%	20.64%	14.75%

New Employee Hires

Region	Female (FY2018)	Female (FY2019)	Male (FY2018)	Male (FY2019)
Singapore	27	10	26	12
Indonesia	53	55	104	79

By Category

Region	Female (FY2018)	Female (FY2019)	Male (FY2018)	Male (FY2019)
Management level and above	20	23	44	46
Executives	163	154	244	249
General worker	47	36	293	283

By Employment Type, Region

Employment Type	Singapore	Indonesia
Permanent	40	419
Contract	3	329

By Employment Type

Region	Female (FY2018)	Female (FY2019)	Male (FY2018)	Male (FY2019)
Permanent	132	128	329	331
Contract (Freelance)	98	85	252	247

Sustainability Topics

Energy Management

With the advent of climate change upon us, environmental sustainability is at the forefront of a sizeable number of investors' minds. As an established and reputable property developer, the Group understands the importance of our role in ensuring energy efficiency when developing property and managing our hotels and resorts, not only to reduce our buildings' carbon footprint, but also being responsible to customers and guests in reducing maintenance costs. Since 2018, The Group has also been tracking our buildings' energy consumption as a gauge for areas where energy saving measures could be effective. In FY2019, the Group's operation in Singapore had consumed 147,013 Kwh of electricity while its operation in Indonesia had consumed 601,252 Kwh of electricity. Compared with FY2018 of 179,395³ Kwh and 636,934 Kwh at Singapore and Indonesia respectively, this is a 18% fall in electricity usage in Singapore and 6% fall in Indonesia. This is in line with our FY2018 objective of monitoring and reducing consumption.

The Group reduced our electricity consumption through leveraging technology. We continued installation of motion sensors in properties managed by the Group. These sensors would activate electric appliances only when people are in the vicinity of the properties' facilities. This conserves electricity especially at night when there is no one around using the facilities. We also continue our replacement of filament lights with Light-Emitting Diode ("LED") and Compact Fluorescent Light ("CFL") that uses up to 75% less energy.

Subsequent Reporting for FY2020

The Group continues our commitment to monitor and analyse our energy consumption, research new innovative solutions to optimise usage and reduce our carbon footprint, to monitor electricity utilisation rates and take conscientious efforts to conserve electricity consumption. Going forward, the Group would also continue to take the initiative in reminding employees to conserve electricity when not in use, and when replacing equipment and accessories, to select the environmentally friendly option where feasible.

Customer Privacy

We value the privacy of all our customers and take the utmost effort in ensuring their data is safeguarded. As part of our business operations, we collect customer data both for regulatory requirements such as law enforcement and operational purposes like reservations and billing particularly in hospitality services and property management.

We have strict protocols established inside our data protection policy, disseminated to all employees, in addition to actively monitoring compliance to local laws and regulation. Customer data used for business purposes would only be accessible to the small segment of authorised employees that require them to better serve the customer. We periodically review and update the access rights to fit business needs, and we have embedded an audit trail into the systems to be able to track data accessed by employees if needed.

In addition, we require explicit documented consent from customers before collecting their data, and we ensure customers are provided information on what is the purpose of the data

³ Note: Due to the closure of hostel operations in FY2019, electricity consumption for FY2018 has been adjusted accordingly for comparative purposes.

Sustainability Topics

collected. The information is stored within our secured information technology system that includes safeguarding measures including limited access rights, firewalls, and a strict internet usage policy.

The Group is appreciative of the dedication from employees to protect customers' data, and are delighted to announce that in FY2019, we have maintained our target of zero reported breaches of customer privacy nor any substantiated complaints concerning loss of customers' data.

Subsequent Reporting for FY2020

The Group remains committed to safeguard our customers' data and privacy and continues to maintain our high standards of zero reported of breaches of customer privacy.

Compliance with Laws and Regulations

Top Global maintains a positive reputation with all stakeholders as a law-abiding Group that is transparent and fair with our business dealings.

The Group's corporate governance practices include robust, regularly reviewed and updated internal controls combined with active monitoring of changes to laws and regulations in the countries the Group operates in. These measures ensure that there are preventive, detective and mitigative controls in place to reduce the risks of material breaches of local laws and regulations.

The Group is proud to announce that for the FY2019, there were zero incidences of non-compliance to local laws and regulations in the environmental, social and economic aspects issued to the Group in line with previously stated goals.

Subsequent Reporting for FY2020

We strive to maintain zero reported incident of non-compliance compliance to the laws and regulations in the environmental, social and economic aspects, through regular monitoring of any changes and new developments of the related laws and regulations.

Sustainability Report – GRI Content Index

GRI Standard/ Disclosure	Page Reference and Reasons for Omission, if applicable
102-1 Name of the organisation	Cover Page
102-2 Activities, brands, products, and services	Sustainability Report 2019: Page 4
102-3 Location of headquarters	Sustainability Report 2019: Page 4
102-4 Location of operations	Sustainability Report 2019: Page 4 Annual Report 2019 Page 6-9
102-5 Ownership and legal form	Sustainability Report 2019: Page 4
102-6 Markets served	Sustainability Report 2019: Page 4 Annual Report 2019 Page 6-9
102-7 Scale of the organisation	Sustainability Report 2019: Page 4 Annual Report 2019 Page 49-55
102-8 Information on employees and other workers	Sustainability Report 2019: Page 14
102-9 Supply chain	Sustainability Report 2019: Page 6
102-10 Significant changes to the organisation and its supply chain	There are no significant changes to the Group's size, structure, ownership or supply chain in this reporting period.
102-11 Precautionary principle or approach	Sustainability Report 2019: Page 6
102-12 External initiatives	The Group does not subscribe to any significant external initiatives
102-13 Membership of associations	No main memberships of industry or other associations, and national or international advocacy organisations maintained at organisational level
102-14 Statement from senior decision maker	Sustainability Report 2019: Page 2
102-16 Values, principles, standards, and norms of behaviour	Sustainability Report 2019: Page 4
102-18 Governance structure	Annual Report 2019: Page 10-12
102-40 List of stakeholder groups	Sustainability Report 2019: Page 8
102-41 Collective bargaining agreements	The management has not adopted any collective bargaining agreement
102-42 Identifying and selecting stakeholders	Sustainability Report 2019: Page 8
102-43 Approach to stakeholder engagement	Sustainability Report 2019: Page 8
102-44 Key topics and concerns raised	Sustainability Report 2019: Page 9
102-45 Entities included in the consolidated financial statements	Annual Report 2019: Page 96-106
102-46 Defining report content and topic boundaries	Sustainability Report 2019: Page 3
102-47 List of material topics	Sustainability Report 2019: Page 9
102-48 Restatements of information	Sustainability Report 2019: Page 15
102-49 Changes in reporting	There is no changes in reporting
102-50 Reporting period	Sustainability Report 2019: Page 3
102-51 Date of most recent report	30 May 2019
102-52 Reporting cycle	Sustainability Report 2019: Page 3
102-53 Contact point for questions regarding the report	Sustainability Report 2019: Page 3
102-54 Claims of reporting in accordance with the GRI Standards	Sustainability Report 2019: Page 3
102-55 GRI content index	Sustainability Report 2019: Page 17-18
102-56 External assurance	Sustainability Report 2019: Page 3

Sustainability Report – GRI Content Index

GRI Standard/ Disclosure	Page Reference and Reasons for Omission, if applicable
103-1 Explanation of the material topic and its boundaries	Sustainability Report 2019: Page 9-16
103-2 The management approach and its components	Sustainability Report 2019: Page 9-16
103-3 Evaluation of the management approach	Sustainability Report 2019: Page 9-16
GRI 201: Economic Performance	
201-1 Direct economic value generated and distributed	Sustainability Report 2019: Page 10-11
GRI 202: Market Presence	
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Sustainability Report 2019: Page 12
202-2 Proportion of senior management hired from the local community	Sustainability Report 2019: Page 12
GRI 302: Energy	
302-1 Energy consumption within the organization	Sustainability Report 2019: Page 15
GRI 307: Environmental Compliance	
307-1 Non-compliance with environmental laws and regulations	Sustainability Report 2019: Page 16
GRI 401: Employment	
401-1 New employees hires and employee turnover	Sustainability Report 2019: Page 14
401-2 Benefits provided to full time employees that are not provided to temporary or part-time employee	Sustainability Report 2019: Page 13
401-3 Parental leave	Sustainability Report 2019: Page 14
GRI 404: Training and Education	
404-1 Average hours of training per year per employee	Sustainability Report 2019: Page 13
404-2 Programs for upgrading employee skills and transition assistance program	Sustainability Report 2019: Page 13
GRI 418: Customer Privacy	
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Sustainability Report 2019: Page 15-16
GRI 419: Socioeconomic Compliance	
419-1 Non-compliance with laws and regulations in the social and economic area	Sustainability Report 2019: Page 16