

CEO's Statement

I am pleased to present our annual Environment, Social and Governance (ESG) report, which outlines the actions taken that demonstrate our continued commitment to sustainable practices, community enhancement and corporate governance. Our efforts this past year reflect a dedication to not only improving our operational performance but also improving sustainability and ensuring positive impacts in the communities where we operate.

Codan endeavours to enhance the well-being of the communities we are part of. A notable highlight was our Tree Planting Day, during which our employees and volunteers successfully planted 500 trees, contributing to local biodiversity and environmental health.

Our engagement with the United Nations Global Compact (UNGC) remains an important part of our ESG strategy. This allows us to leverage the resources and expertise offered by the UNGC to deepen our knowledge and improve our practices. This partnership supports our ongoing efforts to align our operations with globally recognised sustainability principles. It also allows us to interact with peer organisations to reinforce that we are top of class with our initiatives.

In addition to the continued support of charities with whom we have been aligned for many years, this year we are proud to have provided financial support to two additional remarkable local charities: Catherine House and Youth Opportunities. Our contributions to Catherine House have helped provide essential services and support to women experiencing homelessness, offering them a safe place and the resources needed to rebuild their lives. Similarly, our support for Youth Opportunities has empowered young people with the skills, confidence, and opportunities they need to succeed in life. These partnerships are integral to our mission of fostering strong, resilient communities, and we are humbled to contribute to their vital work.

Understanding and managing our greenhouse gas (GHG) emissions is critical to our environmental responsibility. We continue to engage with external specialists to assist us with a comprehensive exercise to rebaseline our GHG footprint for FY23 and to calculate FY24. This rebaselining ensures that our reporting is transparent and reflects our true environmental impact, allowing us to set more precise targets for future reductions. We also engaged with internal stakeholders to identify and investigate GHG reduction opportunities and prepare for the transition to mandatory climate-related reporting. This proactive approach ensures that we remain at the forefront of sustainability practices and are well prepared to meet regulatory requirements.

The Codan Founders PhD Scholarship program is, at the time of writing this statement, actively seeking its first candidate through a detailed application process. We are resolute in our belief that investing in education, innovation and research is pivotal to driving long-term, sustainable growth.

We are proud of the strides we have made this year. Our commitment to ESG principles is a continuous journey, and we are dedicated to making meaningful and measurable progress. We will continue to work diligently to meet our sustainability goals, enhance our community relationships, and uphold the highest standards of corporate responsibility.

Thank you for your continued support as we strive to make a lasting, positive impact on our world.



Sincerely,

Alf Ianniello
Managing Director and CEO

ESG Framework



ENVIRONMENT



Review our global environmental footprint to establish the timeframe and financial implication of making a GHG net zero statement.

Support initiatives that create a positive environmental impact both in business operations and in the wider community.



SOCIAL



Encourage, promote and develop all students, regardless of gender, age, family status, culture, ethnicity or religion to pursue a career in STEM.

Target Community Programs that assist disadvantaged groups within the communities our businesses operate.

Empower and support a connected and high-performing workforce to deliver long term value creation.



GOVERNANCE



Remain committed to conducting business in an honest, ethical and accountable way and in accordance with our core values.

Upholding a strong governance program, including a Sustainability Council, dedicated to identifying and managing risks, issues and opportunities that are important to our business and stakeholders for long term value.

About this Report

This ESG Report seeks to provide information regarding the material aspects of Codan's sustainability practises across Codan and its controlled entities during the financial year ended 30 June 2024 (FY24). The ESG Report (Report) is published on 20 September 2024 and forms part of Codan's Annual Report.

This Report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option. For a full list of disclosures referenced in this Report, please refer to the GRI Content Index available within the ESG report. The information contained within this report has been compiled with the contribution of various leaders across the business and has been approved by the Codan Board. Please note this Report has not been externally assured.

We welcome any feedback and questions you may have on the information presented and encourage you to contact us at sustainability@codan.com.au.

List of Material topics

- Environment
- Social – Our People
- Social – Our Community
- Governance – Corporate Governance Statement
- Governance – Business Ethics / Behaviour
- Governance – Our Supply Chain
- Governance – Cyber Security
- Governance – Tax

All data referenced in this report is in AUD unless otherwise specified.

ESG REPORT

ENVIRONMENT



Climate Change

Codan remains committed to doing its part to mitigate climate change and adapt to a changing world.

Codan supports the goals of the Paris Agreement to limit the global temperature rise this century to well below 2°C above pre-industrial levels and to strive to limit this to 1.5°C.

In accordance with this commitment and in conjunction with the Environment pillar of Codan's ESG Framework, Codan is taking a diligent approach to understand its emissions profile and the actions required to reduce emissions.

In FY24 Codan:

- engaged external consultants to calculate the emissions associated with Codan's businesses and provide a baseline for global operations;
- developed an understanding of the largest sources of those emissions and assessed opportunities for emissions reductions;
- finalised a list of actions and timelines for emissions reduction opportunities;
- took additional steps to enhance Codan's governance of climate-related issues; and
- continued Codan's progressive alignment with the recommendations of the TCFD for effective management of climate-related risks and opportunities.



TCFD Disclosures

Progressing from TCFD towards ISSB IFRS Sustainability Standards

Codan is continuing to use the Task Force on Climate-Related Financial Disclosures (TCFD) Recommendations to structure its climate related disclosures in FY24. TCFD recommendations emerged as the leading global framework for companies and investors to assess climate-related risks and opportunities. The TCFD framework has been used as the backbone for the inaugural International Sustainability Standards Board (ISSB) International Financial Reporting Standards (IFRS) Sustainability Standards – IFRS S1 and IFRS S2 - which set a new global baseline for general sustainability and climate-related disclosures.

The incoming regime for mandatory climate-related reporting in Australia will be based on IFRS S1 and S2 and implemented by new Australian Sustainability Reporting Standards. Given these standards are yet to be finalised, Codan is using the TCFD Recommendations to progress its maturity in the practice and quality of climate-related disclosures. Once the Australian Sustainability Reporting Standards are finalised, Codan will assess what additional actions are required to meet these provisions.

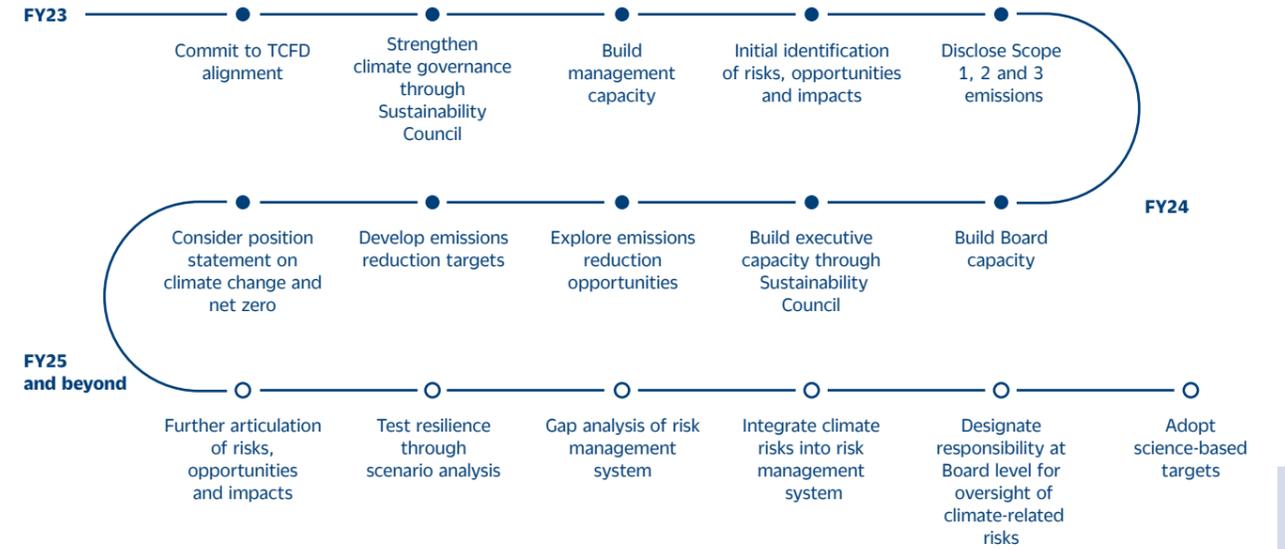
In FY24, Codan advanced along the planned milestones of its TCFD Roadmap. Detail of the actions taken in FY24 are provided in the sections below on Governance, Strategy, Risk Management, Metrics and Targets.

Governance

Codan is committed to responsible and effective governance, which promotes the integrity and efficiency of our business and maximises shareholder value. In accordance with the Governance pillar of Codan's ESG Framework, we aim to uphold a strong governance program including the utilisation of a Sustainability Council. Codan is dedicated to identifying and managing risks, issues and opportunities that are important to its business and stakeholders, which will assist in creating long term value.

Codan took a number of steps in FY24 to enhance climate-related governance mechanisms and to develop subject command in climate-related issues at Board and Management levels.

CODAN'S TCFD ROADMAP



ESG REPORT ENVIRONMENT

Board oversight

In FY24, all members of the Board attended a session on climate-related risks, reporting and directors' duties. This session was conducted to build Board capacity as part of the implementation of Codan's TCFD Roadmap.

The Codan Board has overall responsibility for the oversight of group risks and opportunities, including sustainability and climate-related issues. The Audit and Risk Committee (**ARC**) is responsible for developing and monitoring risk management policies implemented by management. The Board has delegated responsibility to the ARC for all sustainability and climate-related risks. The ARC reports regularly to the Board on its activities.

Amendments were introduced to the ARC Charter in FY24 to specify that the ARC assists the Board in its oversight of financial and non financial risks including climate-related risks and other ESG factors. The ARC Charter also allocates responsibility to the ARC for reviewing and recommending to the Board any reporting to shareholders on matters considered material, including reporting on any material information about climate-related risks.

Other governance mechanisms have been introduced in FY24 to strengthen the way in which climate-related risks are overseen by the Board. Quarterly updates are provided to the Board by the General Counsel and Joint Company Secretary on all ESG initiatives, with a focus on climate-related actions. In FY24, these quarterly updates have also kept the Board informed of developments in mandatory climate-related reporting in Australia and the actions planned in FY24 and FY25 to prepare Codan for compliance with the new reporting requirements.

In addition to quarterly updates, the Board is informed of ESG and climate-related news as required.

Other climate related matters considered by the Board in FY24 were:

- the budget for planned actions in FY25 to prepare Codan for mandatory climate related reporting; and
- expenditure for measures that contribute to immediate or near term emissions reductions such as installation of additional solar panels and EV charging facilities.

Codan's General Counsel and Joint Company Secretary has reported to the ARC on the progress of FY24 targets under the TCFD Roadmap. The ARC will also review and approve the actions required to realise opportunities for emissions reduction.

Management

Management is responsible for the implementation of Codan's group risk management policies and procedures, including the implementation of Codan's ESG Framework and the recommendations of the Sustainability Council.

In accordance with its Terms of Reference, the Sustainability Council has an explicit responsibility to have regard to the physical risks of climate change for Codan's businesses and the risks and opportunities that may be material for Codan as the world transitions to a low carbon economy. Additionally, the Sustainability Council is committed to achieving a high standard of environmental performance and has oversight of the policies and operational controls of environmental, health and safety, and social risks.

Members of the Sustainability Council include Codan's General Counsel and Joint Company Secretary and Chief Human Resources Officer (**CHRO**). In FY24, management representatives from our overseas communications businesses were added as members of the Sustainability Council. The council also includes representatives from facilities, supply chain, and Minelab business units, ensuring that the council is appropriately represented from all parts of the business.

In FY24, a capacity building session was held with the Sustainability Council to build subject command in climate-related risks and opportunities and developments in climate related reporting.

As outlined in its Terms of Reference, the Council has 4 formal meetings each year and the meetings for FY24 were all well attended.

The CHRO is the executive representative on the Sustainability Council. The CHRO reports any material ESG and climate-related issues to the executive team. The General Counsel is the chair of the Sustainability Council and reports directly to the CEO and CFO on all ESG matters.

Strategy

In FY24, Codan invested significant time and resources to analyse Codan's emissions profile. External consultants facilitated engagement with representatives from Codan's business units, supply chain, facilities and logistics functions. Codan also engaged with its contract manufacturers. The objective was to explore the risks and opportunities of reducing the emissions associated with each business and function.

Findings from this analysis have informed Codan's understanding of the specific activities that can reduce emissions in Codan's operations and value chain. Further detail is provided below in the section on "Opportunities to Reduce Emissions".

In FY25, Codan will continue to develop this analysis. This will inform Codan's strategic decision making and approach to the development of emissions reduction targets and other measures to support the transition to a low carbon future.

Climate-related risks and opportunities

In FY23, Codan undertook an initial assessment of climate-related risks and opportunities relevant for its business, starting with a focus on contract manufacturing. The initial assessment found the following:

Physical risks

Risks are event driven (acute) and longer term shifts in climate patterns (chronic). The physical risks relevant to Codan's use of contract manufacturing sites include extreme weather events (acute) and sea level rise (chronic) resulting in flooding which could hinder access to production sites and disrupt distribution.

Transition risks

Risks that are driven by policy, legal, technology and market changes to mitigate and adapt to climate change. The transition risks relevant to Codan's use of contract manufacturing sites, which are low impact risks, include:

- market risks from rising energy costs resulting in increased production costs; and
- policy risks from carbon pricing resulting in increased production costs.

Opportunities

The TCFD also defines categories for climate-related opportunities that may arise for companies in the transition to a lower carbon economy. The initial assessment of opportunities conducted in FY23 related to:

- resource efficiency – potential collaboration with contract manufacturers to investigate opportunities to reduce operating costs by improving efficiency across production processes; and
- products – innovation to develop new products using more recycled materials.

ESG REPORT ENVIRONMENT

Resilience

In FY23, Codan commenced the process of engaging with contract manufacturers on energy and resource efficiency, emissions reduction plans and adaptation of their sites to physical risks. In FY24, Codan had discussions with our two largest manufacturers, Venture Corporation Limited (**Venture**) and Plexus Corporation (**Plexus**). Plexus is a member of the UNGC and shares Codan's public commitment to building a better world through sustainable and responsible business practices. In FY24, Plexus installed solar panels on its facility which contributed to reduced emissions for Codan's manufacturing. Venture has group wide green manufacturing initiatives that include:

- implementation of restriction of hazardous substances (**RoHs**) directive with RoHs certified equipment in its facilities;
- implementation of Ozone Depleting Substance (**ODS**) FREE Process Verification Scheme;
- control and management of emissions, noise and wastewater discharge in all of its facilities;
- establishment of waste management systems and recycling programs;
- resource conservation programs on the use of water, power, paper and other materials in its manufacturing facilities and offices; and
- promulgation of Venture's Environmental Policy and its programmes.

Initiatives that were achieved by both manufacturers in FY24 include:

- maintenance of ISO 14001 Environmental Management Systems certification;
- reducing emissions on the Codan production lines;
- no reporting of any environmental related incidents; and
- ongoing alignment with Codan's Modern Slavery and Human Rights Policy.

In FY25, Codan intends to conduct a more detailed assessment of climate-related risks and opportunities across Codan's businesses and value chain. This will enable Codan to reach conclusions on the risks and opportunities that can reasonably be expected to affect Codan's prospects. Climate-related scenarios will be used to further analyse the short, medium and long-term impacts of risks and opportunities and the implications for Codan's strategy and planning. Codan expects to continue this work into FY26 and beyond.

Risk Management

The Board has overall responsibility for the establishment and oversight of Codan's risk management system.

Risk management policies are established to identify and analyse the risks faced by the Codan group, to set appropriate limits and controls, and to monitor risk and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions and Codan's activities.

The ARC oversees how management monitors compliance with Codan's group risk management policies and procedures and reviews the adequacy of the Risk Management Framework in relation to group risks.

Certain climate-related physical and transition risks are addressed in the Codan Group Risk Register. These relate to business continuity, interruption of material supply, technology risk, reputation, and policy risks. Controls include the ongoing review of Codan's Business Continuity Plan, continued investment in R&D, governance of ESG issues through the Sustainability Council and the ESG Framework, and continued public reporting of Codan's sustainability performance.

As part of Codan's commitment to increasing alignment with the TCFD recommendations, and to prepare Codan for compliance with mandatory climate-related financial reporting in future years, Codan intends to develop processes to ensure that climate-related risks are identified and managed as part of Codan's risk management system. In the coming years, Codan intends to undertake a gap analysis of the existing risk management system and recommendations for integrating climate-related risk.

Metrics and Targets

Codan engaged external consultants to assess and calculate the Scope 1, 2 and 3 emissions for its Australian operations in FY23. This emissions data was included in Codan's FY23 Annual Report. In FY24, Codan re-engaged the same external consultants to assess and calculate Scope 1, 2 and 3 emissions on a consolidated basis for the Codan group. Emissions data for FY23 was also rebaselined which is detailed below.

The FY24 carbon footprint assessment for Codan follows the operational control approach under the GHG Protocol guidelines and covers Scope 1, 2 and 3 emissions for Codan's global operations. Consequently, the Scope 1 and 2 emissions disclosed are related to all Australian and overseas facilities. Scope 3 emission disclosures are based on upstream and downstream emissions in the value chain and all emission sources are included to the extent deemed relevant under the GHG Protocol's guidance. Please note that the activities and emission sources included for Scope 1 and 2 GHG emissions differ from those presented in the FY23 Annual Report. This is because the FY23 Annual Report does not include the emissions activity relevant for the rebaselining exercise.

Codan and external consultants also conducted an analysis of the opportunities for emissions reduction across Codan's businesses. Further detail is provided below in the section on "Opportunities to reduce emissions".

Emissions data

The FY24 assessment follows the standards and guidelines of:

- the Greenhouse Gas Protocol (GHG Protocol); and
- GHG reporting standards recommended by the TCFD.

The FY24 assessment has expanded to include Codan's global operations and therefore includes relevant Scope 1, 2 and 3 emissions from overseas operations that form part of the company's value chain both upstream and downstream.

FY23 Rebaseline

In an effort to refine the carbon footprint for FY23 as published in Codan's FY23 Annual Report, a rebaselining exercise was conducted to account for the following:

- the initial baseline footprint focused on Australian operations which has been expanded to encompass global Codan emissions;
- embodied impact from materials was recategorised from "Processing of Sold Products" to "Purchased Goods and Services" to align with the GHG Protocol's guidance; and
- Zetron's emissions from purchased goods and services (embodied materials) and use of sold products.

Codan's global carbon footprint calculations for FY23 decreased by 21% as a result of the rebaselining exercise. This is a more accurate assessment of Codan's carbon footprint for FY23 and over time, we expect that there will be further adjustments of the calculated GHG footprint as we refine our data collection and calculation process. Codan's intention is to provide the most accurate data as can be reasonably determined using best practice. All further references to the FY23 footprint, are to the rebaselined FY23 footprint.

Table 1 : Rebaselined footprint summary

Emissions Scope	FY23 Annual Report	Rebaselined	
	Footprint (tCO ₂ -e)	FY23 Footprint (tCO ₂ -e)	% Change
1	260	1,433	451%
2	716	948	32%
3	66,135	50,601	- 23%
TOTAL	67,111	52,982	- 21%



Emissions Boundaries

The purpose of an emissions boundary is to define the organisational and operational boundaries for a GHG inventory, indicating which GHG emissions sources and activities are included in the inventory, and those that are excluded. The emissions boundary is a key component of GHG accounting and reporting, as it helps ensure that the inventory is comprehensive and consistent with recognised GHG accounting standards, such as the GHG Protocol.

This report presents Codan's initial proposed Emissions Boundary (Figure 1) which provides a basic indication of the GHG Protocol emissions categories that are included or excluded from the carbon footprint.

Figure 1: Codan's Emissions Boundary

Inside emissions boundary (included)

Scope 1

- Company facilities
- Company vehicles

Scope 2

- Company facilities electricity

Scope 3

- Business travel
- Capital Goods
- Upstream Transport and Distribution
- Downstream Transport and Distribution
- Employee commuting
- Upstream leased assets
- Processing of sold products
- Use of sold products
- End of Life treatment of sold products
- Purchased goods and services
- Waste generated in operations
- Fuel & Energy related activities (not accounted for in Scope 1 & 2)

Outside emissions boundary (excluded)

- Downstream leased assets
- Franchises
- Investments

Total Emissions FY24

Codan's total GHG emissions assessed for FY24 is 54,357 tCO₂-e.

Figure 2: Breakdown of GHG Emissions by Scope

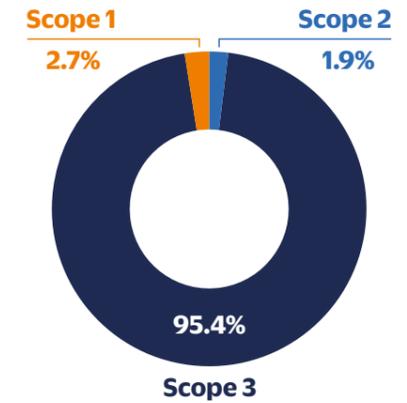


Table 2: Total GHG Emissions by Scope

Scope	FY24 (tCO ₂ -e)	FY23 (tCO ₂ e)
1	1,485	1,433
2	1,037	928
3	51,835	50,601
TOTAL	54,357	52,982

Figure 3: Year on Year GHG Emissions by GHG Protocol Category (tCO2e). Percentages shown are of total emissions for FY24.

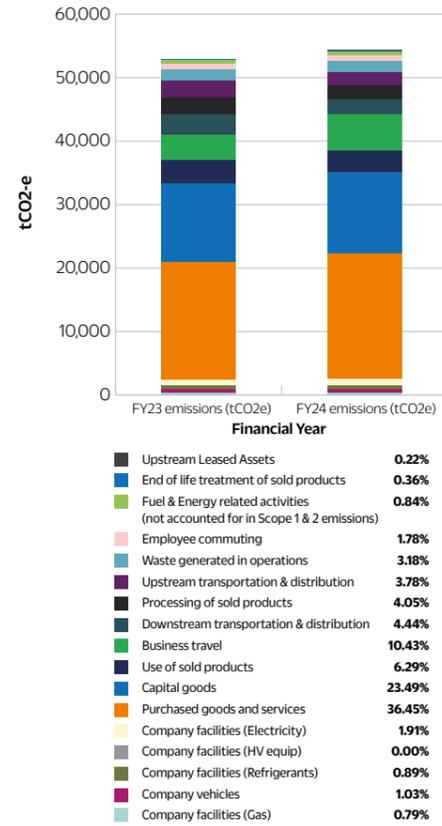


Figure 4: Scope 1 GHG Emissions by Source. Percentages shown are of total emissions for FY24.

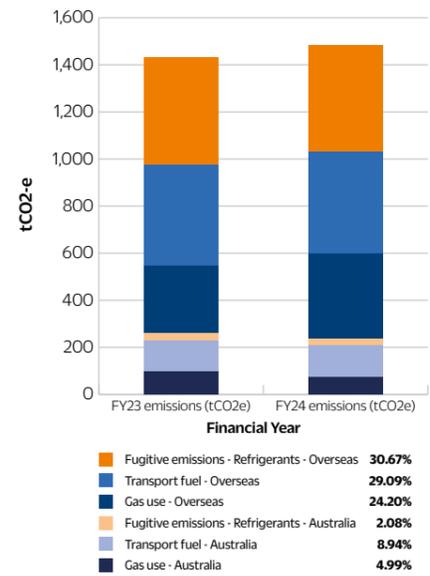


Figure 3 shows the year-on-year variation of total emissions between FY23 and FY24, and breakdown by GHG Protocol category. Overall, emissions have increased by 2.6% from FY23 to FY24, noting that FY24 was a year of significant growth for Codan with revenues up over 20% versus FY23.

Scope 1 Emissions

The Scope 1 GHG emissions for Australian facilities are from:

- 56% transport fuel;
- 31% natural gas; and
- 13% fugitive emissions of refrigerants.

The Scope 1 GHG emissions for overseas facilities are from:

- 36% fugitive emissions of refrigerants;
- 35% transport fuel; and
- 29% natural gas use.

Emissions increased during FY24 when compared to FY23, however, there was an improvement in data quality where invoices were used to calculate emissions for some overseas sites. Activity from other overseas locations were estimated using the same assumptions from FY23.

Scope 2 Emissions

Electricity consumed at Mawson Lakes was 1,028,705kWh during FY24 of which 35% was renewable electricity sourced from solar generated on site and the grid.

Overall, electricity use at Mawson Lakes decreased by 3.1% when compared to FY23, however, residual non-renewable electricity consumption increased by 0.5%. The remaining electricity consumed in Australia was 279,074kWh in Brisbane, of which 18.7% was renewable electricity sourced involuntarily from the jurisdictional LRET portion of the grid.

The combined voluntary and involuntary emissions avoided total 686 tCO2e for FY24. This is due to 69% of consumption being sourced from renewable electricity sources. The breakdown of these emissions avoided are:

- 165 tCO2e for on-site solar at Mawson Lakes;
- 354 tCO2e for grid purchased 100% renewable electricity at DTC UK in Whiteley; and
- 167 tCO2e for the jurisdictional LRET portion of the grid in Australia.

During FY24, there was an improvement in data quality and emission factors for a number of overseas sites which were either estimated or not included last year and may explain the increase in these emissions.

Scope 3 Emissions

Purchased goods and services are the biggest driver of Scope 3 emissions, resulting in 38% of total scope 3 emissions for FY24. Key activities within purchased goods and services include embodied impact of materials and spend on office equipment and low value assets.

Figure 5: Scope 2 Emissions by Source (tCO2e) sections above line show avoided emissions from renewable.

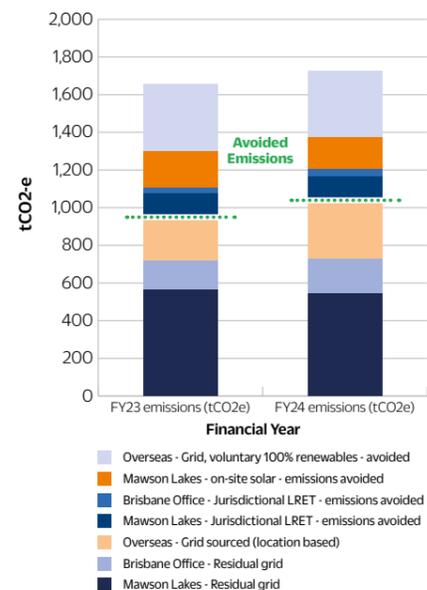


Figure 6: Scope 1 and 2 Energy Use (kWh). Percentages shown are of total activity for FY24.

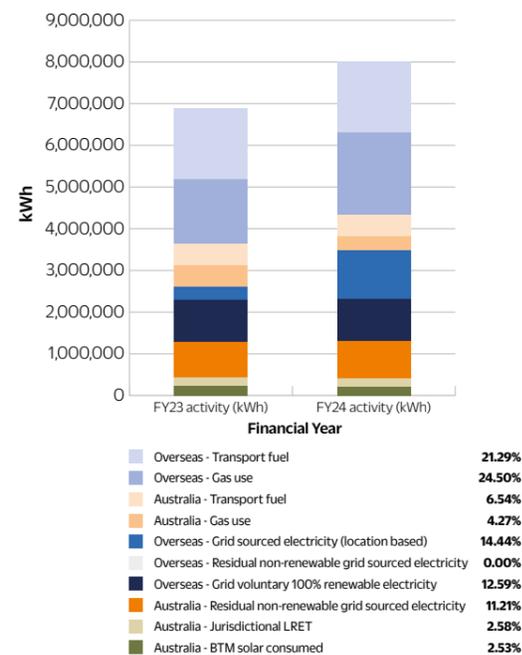
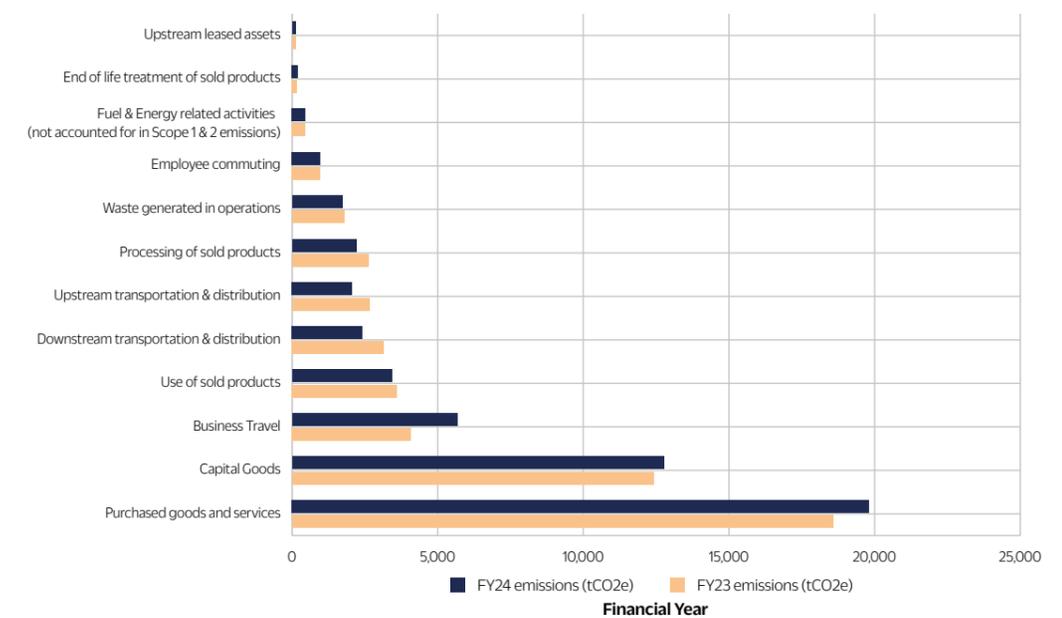


Figure 7: Scope 3 Emissions by GHG Protocol Category.



ESG REPORT ENVIRONMENT



Opportunities to reduce emissions

Working with external consultants over the course of FY24, Codan completed an assessment of emissions reduction opportunities. The assessment involved the participation of internal stakeholders representing the key functions of Codan's business activities. Stakeholder sessions were conducted with Codan business units, as well as supply chain, facilities and logistics functions. The purpose of these discussions was to explore the risks and opportunities in relation to reducing the emissions associated with each business and function. In addition, discussions took place with Plexus and Venture on the risks and opportunities related to reducing emissions from Codan's use of contract manufacturing.

Findings from this process led to the preparation of a list of priority actions to reduce emissions. The stakeholder groups were re-engaged to review these actions and discuss feasibility and timelines. Additional discussion took place with Codan's CEO and CFO to consider the operational implications of the actions and timeframes and confirm which actions to recommend to the ARC for approval.

The opportunities for emissions reduction that are under consideration for the short term include:

- installation of additional electric vehicle charging stations at the Mawson Lakes office;
- creation of an Uber "Business Corporate Account" to utilise electric and low emission vehicles when on business travel;
- use of renewable energy electricity packages for all offices;
- increase percentage of sea freight used compared to air freight; and
- use electric, hybrid or low carbon vehicles when replacing existing fleet vehicles.

On review and approval by the ARC in FY25, Codan will start taking the necessary actions to realise these opportunities. These are the actions that have been identified in the short term. We recognise that there is more that will be required in the future, and we will continue to investigate and assess other opportunities.

Additional analysis and monitoring will be conducted so that Codan has sufficient data to develop and set public emissions reduction targets.

In relation to DTC's UK operations, a carbon reduction plan was established in FY23 to meet stakeholder and regulatory expectations in the UK. The DTC carbon reduction plan was reviewed and updated in FY24. Ongoing monitoring of the DTC carbon reduction plan will form part of Codan's overall monitoring of the implementation of emissions reduction actions across the group.

Ongoing environmental management

Our global head office is located in the Technology Park precinct of South Australia and houses approximately 230 staff (**Head Office**). It is currently awarded a 5.0 star NABERS energy rating. The fit for purpose space is fitted with solar panels and electric vehicle charging stations providing free energy to staff. We maintain an effective Environmental Management System that is integral to our business process and is accredited to AS/NZS ISO 14001 Environmental Management Systems.

All waste (including all business and production waste) produced by Head Office totalled 62 MT was 100% diverted from landfill in FY24 with 6.74 MT recycled. Head Office separates waste for collection by type including food waste and organics, e-waste, cardboard, batteries and secure documents.

Head office had a total water consumption of 9926kl which was all taken from city water services.

In FY24, Codan introduced a new Environment and Biodiversity Policy which recognises the importance of biodiversity conservation and protection. Codan is monitoring the voluntary corporate reporting trends on nature and biodiversity risk, and the uptake of the Taskforce on Nature-related Financial Disclosures (**TNFD**) Recommendations. As these reporting practices emerge, Codan will determine whether to commence voluntary reporting using the TNFD.

We are mindful of our indirect environmental impact within our supply chain. Our Supplier Code of Conduct encourages our suppliers to develop a more sustainable business by minimising their environmental impact. Our two largest contract manufacturers (Plexus and Venture) are accredited with ISO 14001 Environmental Management Systems. Both have confirmed their sites reported no environmental incidents for FY24.

Codan products are RoHS certified. The goal of RoHS is to reduce the environmental effect and health impact of electronics. The legislation's primary purpose is to make electronics manufacturing safer at every stage of an electronic device's life cycle. Codan products are also fitted with a Waste Electrical and Electronic Equipment (WEEE) Sticker which encourages consumers to dispose of the product thoughtfully when at the end of its life cycle.



Our People

Our Core Values have been a long-standing set of shared principles that shape the culture in the Codan community and contribute to our people achieving our organisational goals. In April 2024 we relaunched our Core Values, which included some small changes to reflect the organisation we are today, and the organisation we aspire to be. The statements that accompany each value were refined to reflect a stronger employee focus.

In relaunching the Core Values through our inaugural CEO e-communication, our employees were able to hear from our CEO who shared his observations and aspirations for the Core Values to shape the future of Codan.

"We recognise the vital importance of our Core Values in shaping the future of Codan. They are not just words on a wall, they are the guiding principles that inform our decisions, shape our interactions, and shape our identity as a company. By embracing these Core Values, we create a culture of excellence, collaboration and integrity that sets us apart. Together, we will strive for excellence, build enduring relationships with our customers and each other, and continue to innovate and lead in our industry."

Alf Ianniello – Codan CEO

We also had the privilege to interview employees from across our global organisation and capture their sentiments and perspectives of the Core Values in their work and personal lives. Despite the growth that the business has seen in recent years, it was clear that the Core Values bring us together and reflects all our people in all our offices globally. This was summed up by our Chief Human Resources Officer (CHRO):

"Regardless of which office you work in, which region you live, or which of our businesses you're part of. Whether you're a long tenured employee or just starting your journey with us, I'm looking forward to seeing new ways our Core Values are reflected in how you do your work, and how you interact with each other and with our customers."

Marjolijn Woods – Codan CHRO

Engagement Survey

In September 2023, we launched a company-wide Employee Engagement Survey with 85% participation. Our engagement score, which is a measure of people's connection and commitment to the company and its goals, was 72% favourable. A significant contributor to this score, was that 85% of our employees reported they would recommend Codan as a great place to work.

Our employee footprint has grown enormously since our previous employee survey, and it was important to validate what is important to our current workforce. While the engagement score was strong, we had key areas for action and work continues to progress these at all levels of the business. The key Codan Group actions are for our leadership to provide strong communication of a vision, greater access to career opportunities, and confidence in our leaders to take action following the survey.

Some of the activities to address these actions, include the development of an Internal Communications Framework, which offers a clearly defined structure and schedule for communications to all levels and regions throughout the organisation. The Internal Communications Framework includes the CEO e-communication used to relaunch the Core Values mentioned above. For career growth, we have launched a global newsletter promoting internal vacancies, greater focus on development objectives in the performance review process, and a new talent and succession planning framework. A reward and recognition program is also under development.



TRUST AND INTEGRITY



HIGH PERFORMANCE



CUSTOMER DRIVEN



CAN-DO



ESG REPORT SOCIAL

Diversity, Equity and Inclusion (DEI)

Research shows that a diverse workforce is strongly linked to high performing teams, and we see evidence of that at Codan across our global workforce. Work has commenced to develop DEI strategy which will include broad consultation with employees through focus groups and stakeholder interviews. This project will enable us to continue to ensure that our people continue to reflect diversity in our business, through gender, age, family status, culture, race, ethnicity, sexuality, religion and beliefs. We are also committed to providing an environment where all our employees can succeed and meet their potential, feel part of a team and contribute to Codan's success.

Gender representation	FY24		FY23	
	Female %	Male %	Female %	Male %
Board	40%	60%	40%	60%
Senior Executive	17%	83%	17%	83%
Senior Management	24%	76%	24%	76%
Other	24%	76%	26%	74%
Whole workforce	24%	76%	25%	75%

Health and Wellbeing

Our Health & Fitness Improvement Program is an initiative to provide health and wellbeing opportunities and activities to our employees. This was held again in our Head Office location and was also offered in our global offices, where the program was tailored to reflect the local culture, environment and climate.

Our Head Office location at Mawson Lakes offered the opportunity to attend sessions including the very popular ergonomic assessments for workstations, skin checks, 1-on-1 nutrition consultations, short health checks for blood glucose and blood pressure, and seated massages. There was also a series of seminars from health professionals, covering topics including work life balance, stress management, resilience, and financial wellness. One key activity that has sustained beyond the 12-week program are the walking groups at lunch time and after work, which sees our objective to build new connections and providing support to colleagues in action.

Our Zetron division organised a team from each of their global offices to participate in the "911der" Women Virtual 5K walk, to support a community providing mental health and wellness resources, training, career development, outreach, and research to 911 responders. The Zetron office in Victoria (Canada) launched a health initiative for employees providing a selection of fresh fruit daily which has been welcomed.

In the Zetron UK office, a wellness day was coordinated onsite with several activities on offer including zinc taste testing, an education session on sleep, as well as body composition testing, which measured factors including fat, muscle, BMI, metabolic rate and age. This was followed by a session with a qualified nutritionist where the results were discussed in detail by providing the opportunity for employees to learn and understand their health risk factors, metabolic age, and most importantly, what steps they can take in terms of nutrition and other habits to bring about improvements.

Development and Learning

Codan's in-house mentoring program remains a key development opportunity in the organisation with strong interest from employees across the group for both the mentor and mentee roles. This program is a meaningful way to connect our employees across regions and business units, while offering the opportunity for learning from others' experience and perspectives. Many relationships between mentors and mentees have sustained beyond the mentoring program, while also providing real opportunities for collaboration that would otherwise not have been possible.

A key project has been our Human Resources Information System (HRIS) which is due to be launched early in FY25. This project will enable us to move from using disparate systems to a single platform to deliver performance, talent and succession, and learning and development to our global workforce. The HRIS will allow us to capture inputs more securely and consistently, and track progress against development activities to ensure development and succession outcomes are realised. Our framework for succession planning and talent mapping has been developed and was piloted earlier this year, bringing a more focused and structured approach to this activity.

	FY24	FY23
Learning & Development (\$000)	658	306



ESG REPORT SOCIAL

In addition to the scholarships that Codan provides through a number of South Australian institutions, we have also fostered our long standing relationships with local universities to provide meaningful work experience for future engineers in our Head Office location. Codan offers selected candidates a four year apprenticeship at Head Office, and also offers internships across the business.

Zetron Canada continues to partner with the University of Victoria, with 5 co-op students currently undertaking placements. The co-op program has a strong history of resulting in permanent employment for students post-graduation. The Zetron US and Brisbane offices both currently have an intern within their marketing and engineering teams respectively.

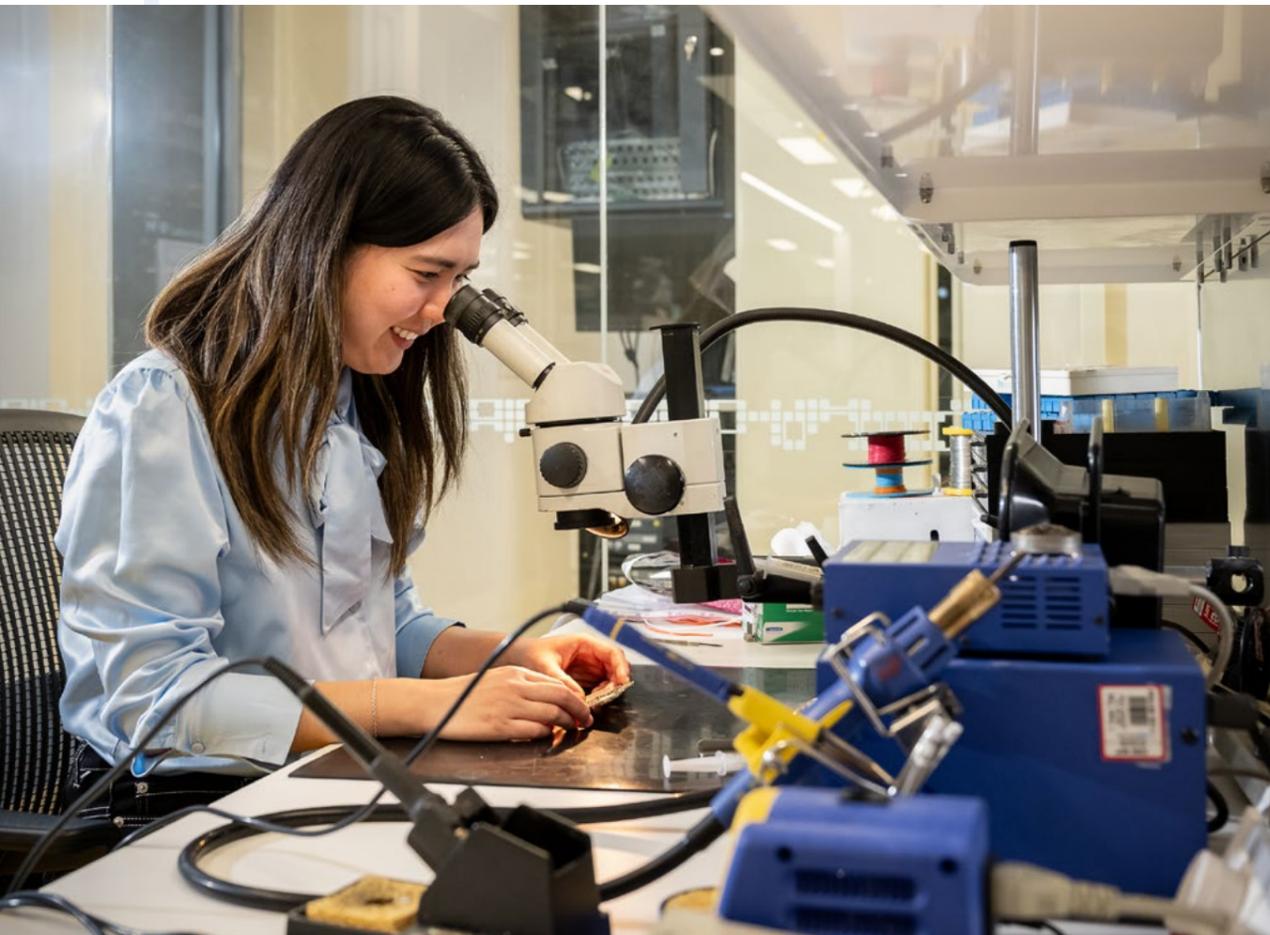
DTC UK continue their established four year apprenticeship framework, which offers a qualification at the end of the tenure to school leavers across a number of disciplines. This is also complemented by their ongoing focus to include graduate positions in the workforce profile, providing an internal talent pipeline.

Codan continued their support of the South Australian Node of the Australian National Fabrication Facility (ANFF-SA) Microengineering School, hosting industry tour groups to showcase career opportunities in manufacturing.

WHS

We maintain an effective Work Health and Safety System that is integral to our business processes and are accredited to OHSAS 18001 and AS/NZS 4801 Occupational Health and Safety Management Systems. FY24 reporting is now extended to capture all global locations, with all Codan sites encouraged to report near misses and incidents. Our positive reporting culture allows us to anticipate and proactively address safety concerns.

Workplace Health & Safety Statistics	FY24	FY23
Lost Time Injuries	1	1
Near Misses	3	1
Incidents	49	15
Fatalities	0	0



Our Community

Employing over 200 engineers across the Codan group, STEM disciplines are a large part of our business operations. To further future proof our talent pipeline, an ongoing commitment is to encourage, promote, and develop all students, regardless of gender, age, family status, culture, ethnicity, and religion to pursue a career in STEM. Across all our offices, we have continued to engage with local universities, including exhibiting at various career fairs and networking events to promote and discuss the career opportunities we have available within the Codan Group.

In November 2023, Codan, in collaboration with the University of Adelaide, officially launched the Codan Founders Scholarship program.

Codan is extremely proud to honour and continue to build the legacy established by our founders; Mr Ian Wall, Mr Jim Bettison and Mr Alastair Wood. Their legacy at Codan is integral to our people and the success of our business, with an ever present commitment to innovation and growth. Each of our founders were pioneers in engineering excellence, delivering innovative products that truly made a difference in the world. In working with the University of Adelaide, where each of our founders began their journeys, we aim to honour the impact they had as engineers and innovators. The PhD program is a multi-year commitment, each of which will take approximately three years to complete. We aim to develop projects with the University for each of these scholarships across our core business units and their respective technology and product offerings. Through the program, we are seeking to attract and introduce elite students to the way in which Codan's world class engineering teams operate. As part of the program, the students will spend time at Codan to work with and experience our engineering teams in action. This is an integral part of the program, to ensure genuine cross learning between Codan and the PhD students. Codan values the importance of innovation and development of novel Intellectual Property in creating life changing products for its customers. In partnering with an esteemed institution like the University of Adelaide, with its world leading Faculty of Sciences, Engineering and Technology, we are confident that our investment will allow us access to the most highly talented students with whom we can partner to develop more groundbreaking and innovative technologies.



Pictured: Jessica Gallagher, University of Adelaide Deputy Vice-Chancellor External Engagement and Codan Managing Director and CEO Alf Ianniello.

Codan continues to support the Undergraduate STEM Scholarship for Women with the University of South Australia. Available to second year female students enrolled in a full-time or part-time eligible STEM undergraduate program, the scholarship is valued at up to \$15,000 over three years. It also provides a paid work experience component to complement the financial assistance and extend the scholarships value by providing practical work based experience, mentoring, and a potential pathway to employment. Codan also participated in the University of South Australia STEM Girls Academy Creative Challenge. The challenge is based on the problem solving mindset "Design Thinking" and combines a series of steps which can guide you to think as a designer, sparking ideas that can lead to innovation. Through the STEM Girls Academy, students learn this methodology in a series of workshops, where they are guided and mentored by industry professionals to solve a problem presented to them. Codan's challenge workshops were led by Vanessa Nery, Technical Author at Domo Tactical Communications and Joey MacDougall, In-House Legal Counsel at Codan.

We also continued to support the Codan Playford Trust honours scholarship. The \$10,000 scholarship is awarded annually to an outstanding student commencing third year, fourth year or Honours in electronic engineering, signal processing or physics, with an interest in sensing systems. The successful applicant has the opportunity to undertake paid work experience at Codan. The aim is to help the student develop skills and knowledge and enhance their industry experience. The students will work on projects in a collaborative environment, actively contributing and drawing on the experience of others.

ESG REPORT SOCIAL

Being a socially conscious and responsible organisation is a part of Codan's corporate identity. Our mission is to target community programs that assist disadvantaged groups within the communities our businesses operate.

	FY24	FY23
Donations (\$000) inclusive of product donations	387	230



Codan is a proud major sponsor of Youth Opportunities. Youth Opportunities supports young people to develop the lifelong skills, habits and confidence to thrive. Through this sponsorship, Codan will provide 40 young people in Northern Adelaide the opportunity to participate in the Youth Opportunities Elevate Personal Leadership Pathway program, and award 2 Educational Scholarships. This wellbeing and leadership program offered to Year 10 students, will help them to develop the skills to overcome adversity, build resilience and optimism, and prepare for their future while also providing access to opportunities which reduce barriers to achieving their potential.

"My main career goal is to become a successful lawyer, assisting people and communities in need of legal support. Receiving this laptop is life changing for me. Having a laptop will make it easier for me to follow my student studies and work on assignments, research, and projects. It will enable me to invest more time in my education, personal development, and community engagement efforts. By supporting my education, the laptop will directly contribute to my goal of becoming a lawyer. The laptop's impact will benefit not only me but also those I'm committed to helping. This support will help me achieve my career aspirations and empower me to become a more impactful leader in my community."

**Zainab, Salisbury High school,
Codan Educational Scholarship Recipient.**



Each year, Zetron holds an annual "Shoot for the Stars" golf tournament, benefiting Behind the Badge foundation. All proceeds from the event go directly to the Behind the Badge Foundation, an organisation supporting the agencies, families, and communities of law enforcement officers that are seriously injured or killed in the line of duty.

Shoot for the Stars has grown each year and become engrained in Zetron culture, with many employees contributing as volunteers and supporters. Over 11 years, Zetron Shoot for the Stars events have raised more than \$400,000 for the foundation.

"Everyday law enforcement works on behalf of our communities to serve and protect us all and we are honoured to play a small part in helping survivors of line of duty tragedies and their families through the amazing work of the Behind the Badge Foundation. Over the years, Shoot for the Stars has become so much more than a one day event for us. It's an important gathering that brings together our employees, partners, and community to show our pride and appreciation for those who sacrifice so much to serve."

**Scott French, Zetron President
and Executive General Manager.**



Codan is a long-time proud supporter of Variety - the Children's Charity (**Variety**). 2024 marks our 36th year of gold sponsorship of the Variety Bash, Australia's largest and longest running charity motoring event through the Australian outback. Codan participates in the event with its own Variety Bash vehicle and oversees the radio communications in the lead up to the event. In addition, Codan is responsible for manning the control centre to facilitate the communication and tracking of all official vehicles, mobile workshops and mobile doctors, for a safe and successful Variety Bash. Codan employees conduct site surveys ahead of the Variety Bash to ensure the remote site provides reliable communications along the Variety Bash route, as well as provide HF radio operator training, assist with radio installations and attend Variety Bash meetings.



Codan hosted its fourth annual charity golf day in South Australia, where key stakeholders were invited to register a team to participate in a fun filled day on the course. Over \$112,000 was raised inclusive of key stakeholder and Codan donations, and this amount was donated and distributed evenly amongst three chosen charities, namely: Variety, Hutt St Centre and KickStart for Kids.

This year, Codan was proud to extend its support to Catherine House, South Australia's only homelessness and recovery service for women. Catherine House provides crisis and long term accommodation, mental health programs, access to education and employment opportunities and other support services to women experiencing homelessness in the state. Over \$2,000 was raised for Catherine House through donations by employees at an International Women's Day morning tea held at our Mawson Lakes headquarters, in addition to the investment that Codan made to its programs.

Aligning with our ESG commitment to support initiatives that create a positive environmental impact on the wider community, Codan partnered with Hills Biodiversity to plant 500 native trees and plants at the Mt Barker Springs Water Reserve in the Adelaide Hills. Thirty years ago, the Mt Barker Springs site, also known as Drivers' Rest, was thriving with native grasses, forbs and sedges. Recently the land has been heavily grazed, reducing native vegetation and enabling exotic plants to thrive and the soil to degrade. A significant regeneration project is now underway at the site, led by Hills Biodiversity, which is focused on restoring the native grassland and enhancing the local biodiversity of Mt Barker Springs. Contributing to this important restoration project was a fulfilling experience for our employees.



Corporate Governance Statement

Codan's corporate governance statement, which was approved by the Board on 21 August 2024, is available on the company's website and may be accessed at <https://codan.com.au/who-is-codan/corporate-governance/>

Business Ethics/Behaviour

Codan's Code of Conduct provides a framework for employee conduct, with guidance around expected and acceptable standards of behaviour that are aligned with our Core Values, and which allow us to work together to achieve the goals of the business. The Code of Conduct and Core Values are included in induction packs for new starters.

An essential part of our culture of "Trust & Integrity", one of Codan's four Core Values, is underpinned by our "Speak Up" culture. This culture encourages staff to raise issues or conduct that concerns them. Our "Speak Up" culture is reinforced by our Code of Conduct, Core Values and Whistleblower Protection Policy. We take all reports of harassment, discrimination, bullying and any form of misconduct very seriously. Our grievance procedure facilitates the appropriate investigation and resolution of complaints. There were no workplace grievances registered globally during FY24.

At Codan, we take compliance seriously. We have a strong, fit for purpose compliance program run by our in house Legal & Compliance department. Staff training is a critical part of this program and is compulsory for all employees and forms part of our induction program. This induction includes training on Anti-Bribery and Anti-Corruption (ABAC), Modern Slavery, Whistleblower Protection and Code of Conduct. Our training program is risk-appropriate, with additional tailored training sessions conducted for staff in high-risk roles.

ABAC remains a material topic for our business, as we acknowledge some of our businesses operate in high-risk environments. Our ABAC program and ABAC Policy is reviewed annually to ensure it remains fit for purpose and in line with best in practice anti-bribery compliance programs. Key aspects of the program involve a risk driven due diligence process for third party business partners, regular training for high-risk staff and a selection of third parties, and an approval based gratuities register. Internal audits are conducted on high-risk transactions.

Codan's sanctions compliance program is a groupwide approach that uses enhanced due diligence measures, external resources, monitoring and approval procedures to ensure we meet our global sanctions obligations.

Codan's modern slavery program is continually reviewed in line with our Modern Slavery and Human Rights Policy. To seek continual best practice, Codan has also joined the UNGC's Modern Slavery Communities of Practice, which allows discussions across different industries and organisation size, to share ideas. Codan produces a Modern Slavery Statement designed to meet the disclosure requirements of the Australian Modern Slavery Act 2018 (Cth). In undertaking its risk assessment with respect to Modern Slavery, Codan has again identified that its main risk lies with its major third-party contract manufacturers. Presently, this includes Venture and Plexus. Both are based in Penang, Malaysia and manufacture more than 60% of Codan product.

Codan's supply and procurement team are in regular contact with Plexus and Venture and have undertaken numerous discussions around their approaches to modern slavery. Codan's Supply Chain Manager and Legal Counsel also visited both sites to conduct an in-person audit, following on from the in-person audit conducted in FY23. These audits allowed us to see first hand that our contract manufacturers share the same expectations with respect to modern slavery compliance.

We have a Supplier Code of Conduct and Supplier Terms and Conditions that include Modern Slavery clauses. In FY24, the Supplier Code of Conduct was revised to include requirements for suppliers to abide by Codan's Conflict Mineral Policy and comply with the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at work. We have systems in place to carry out daily online searches on our highest risk suppliers for any adverse media, including modern slavery topics, and to date we have had no adverse "hits". Codan is not aware of any supplier non-compliance with social expectations or any contractor fatalities in FY24.

	FY25 Target	FY24 Actual	FY23
ABAC Policy violations	NIL	NIL	NIL
ABAC Internal audits	2	2	2
Sanction breaches and fines	NIL	NIL	NIL
Modern Slavery breaches	NIL	NIL	NIL



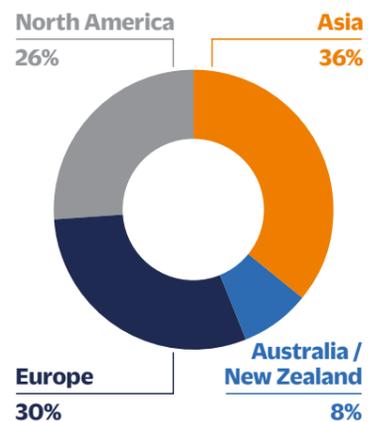
ESG REPORT GOVERNANCE

Our Supply Chain

Codan has an extensive global supply chain in place, sourcing product and material from most regions in the world. We partner with suppliers who meet stringent quality standards, are innovative and work in safe and responsible ways. Our dealings with our suppliers reflect Codan's core values, and as such, we have built collaborative, honest and trusting relationships which have resulted in reliable supply over the long term.

Our supply chain is responsive to the changing needs of our customers and markets. All Codan suppliers must provide agility, flexibility and speed to market. At the end of our supply chain are global distribution centres located in the UAE, USA, Malaysia, Poland, Brazil, Mexico, India and Australia, which ensure product is regionally distributed for the fastest route to market.

Codan Group supplier spend



Codan has 1,000 active suppliers across the Codan Group, with supplier spend circa \$161 million across mostly electronic components, as well as cables, antennas, plastics and packaging.



Cyber Security

As a global technology company, safeguarding our intellectual property and confidential information is paramount to maintaining trust with our customers, suppliers and partners. As the probability of cyber-attacks increases the risks and becomes more complex, Codan has adopted a risk-based framework to protect our assets. Cyber risks are regularly reported to the Codan Board and Audit and Risk Committee. Relevant organisational policies and standard operating procedures are in place and are regularly reviewed to ensure they remain commensurate with the external risk.

During FY24, Codan completed penetration testing and regular vulnerability assessments to highlight potential system vulnerabilities. Continued staff awareness training as well as rolling this program out to recently acquired companies.

In FY24, Codan had no known major security incidents or events that resulted in loss of confidential information or intellectual property.

Tax

As part of our commitment to meeting our global taxation obligations in a transparent and open manner, we conduct our tax affairs within a robust tax risk management policy and framework overseen by the Board.

Codan's tax governance process is documented in our Tax Risk Management Policy and Framework. This framework is based on the philosophy of managing tax risk through a well-planned approach built around the following principles:

- a transparent and accountable relationship with local country tax authorities;
- the payment of the legally correct amount of tax in a timely manner;
- the systematic identification of significant tax sensitive transactions ahead of time;
- the documentation of tax processes to facilitate review and minimise the impact of changes in personnel;
- defined channels for the reporting of tax information to the Board;
- internal controls, with effectiveness of those controls assessed on a regular basis;
- Codan should not enter any transaction where there is a material risk that any legislative general anti-avoidance provisions will be applied by a Court; and
- Codan will not promote tax exploitation schemes.

The Board has delegated oversight of Codan's taxation affairs and the framework to the Audit and Risk Committee. The framework requires the Committee to attest to the Board on a yearly basis that it has effective policies and processes in place to manage tax risk.

The CFO has overall responsibility for the group's taxation affairs, including enforcing policies and implementing strategies approved by the Board, developing and implementing systems that identify, assess, manage and monitor tax risks, monitoring the appropriateness, adequacy and effectiveness of tax risk management systems and reporting on tax risk and management to the Board.

The CFO is also responsible for the maintenance of in-house tax resources with appropriate qualifications and experience in taxation matters, to oversee that Codan's obligations globally are discharged in a legally correct and timely basis and that the tax risk management controls set out in the framework operate in an effective and robust manner.

The framework requires management to consult with reputable local country external tax advisors where appropriate to ensure compliance with local country obligations. KPMG is engaged to review the numbers disclosed in the "Tax Note" in the Annual Report each year, as part of the half-year review and full-year audit. We apply arms'-length principles to our international related party dealings, engaging with external advisors with appropriate expertise to ensure our compliance with transfer pricing laws globally.

As part of our commitment to our tax risk management policy and framework, we adopted the recommendations of the Board of Taxation's Tax Transparency Code with effect from 30 June 2021. To this end, the board has directed that each year the Annual Report should contain sufficient information to comply with Part A of the Code. The Part A disclosures required of Codan by the Code are:

- Codan's Australian and global effective tax rates;
- a reconciliation of the accounting profit to income tax expense;
- a reconciliation from income tax expense to current year income tax payable; and
- identification of material temporary and non-temporary differences.

The Part A financial information can be found in the Taxation Note (Note 7) of the Notes to the Financial Report on page 99 of this Annual Report. As Codan's business has continued to diversify, and in line with the success of our communications business, the activities and assets which generate our income have become more balanced and spread across the globe. In FY24, we paid \$7.1 million corporate income tax in Australia which is approximately a third of our global corporate income tax contribution. Our shareholders continue to benefit from the generation of Australian franking credits from Australian tax paid.



GLOBAL REPORTING INITIATIVE (GRI) STANDARDS : CORE OPTION

CONTENT INDEX

Statement of use: Codan Limited has reported the information cited in this GRI content index for the period 01 July 2023 to 30 June 2024 with reference to the GRI Standards.

GRI 1 used: GRI 1: Foundation 2021

GRI Standard	Disclosure	Location
GRI 2: GENERAL DISCLOSURES 2021	2-1 Organizational details	Codan Limited
	2-2 Entities included in the organization's sustainability reporting	Annual Report > Financial Statements Note 22 Group Entities page 108
	2-3 Reporting period, frequency and contact point	Annual Report > ESG Report > About this report section page 31
	2-4 Restatements of information	Not applicable
	2-5 External assurance	Annual Report > ESG Report > About this report section page 31
	2-6 Activities, value chain and other business relationships	Annual Report > Financial Statements Note 2 Segment Activities page 95 Modern Slavery Statement accessible https://codan.com.au/who-is-codan/corporate-governance/
	2-9 Governance structure and composition	Annual Report > ESG Report > Corporate Governance Statement page 52
	2-10 Nomination and selection of the highest governance body	Annual Report > ESG Report > Corporate Governance Statement page 52
	2-11 Chair of the highest governance body	Annual Report > ESG Report > Corporate Governance Statement page 52
	2-19 Remuneration policies	Annual Report > Remuneration Report - Audited pages 63 - 76
	2-20 Process to determine remuneration	Annual Report > Remuneration Report - Audited pages 63 - 76
	2-26 Mechanisms for seeking advice and raising concerns	Annual Report > ESG Report > Business Ethics / Behaviour section page 52
	2-27 Compliance with laws and regulations	Annual Report > ESG Report > Corporate Governance Statement page 52
2-28 Membership associations	During FY24, Codan Group employees held board positions on the following industry associations: Director, Export Council of Australia	
2-29 Approach to stakeholder engagement	Annual Report > ESG Report > About this report section page 31	
2-30 Collective bargaining agreements	Not applicable	

GLOBAL REPORTING INITIATIVE (GRI) STANDARDS : CORE OPTION

CONTENT INDEX

GRI Standard	Disclosure	Location
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Annual Report > ESG Report > About this report section page 31
	3-2 List of material topics	Annual Report > ESG Report > About this report section page 31
	3-3 Management of material topics	Annual Report > ESG Report > About this report section page 31
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Annual Report > ESG Report > Business Ethics / Behaviour section page 52
	205-2 Communication and training about anti-corruption policies and procedures	Annual Report > ESG Report > Business Ethics / Behaviour section page 52
	205-3 Confirmed incidents of corruption and actions taken	Annual Report > ESG Report > Business Ethics / Behaviour section page 52
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Annual Report > ESG Report > Environment section pages 32 - 43
	302-2 Energy consumption outside of the organization	Annual Report > ESG Report > Environment section pages 32 - 43
	302-3 Energy intensity	Annual Report > ESG Report > Environment section pages 32 - 43
	302-4 Reduction of energy consumption	Annual Report > ESG Report > Environment section pages 32 - 43
	302-5 Reductions in energy requirements of products and services	Annual Report > ESG Report > Environment section pages 32 - 43
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Annual Report > ESG Report > Environment section pages 32 - 43
	305-2 Energy indirect (Scope 2) GHG emissions	Annual Report > ESG Report > Environment section pages 32 - 43
	305-3 Other indirect (Scope 3) GHG emissions	Annual Report > ESG Report > Environment section pages 32 - 43
	305-4 GHG emissions intensity	Annual Report > ESG Report > Environment section pages 32 - 43
	305-5 Reduction of GHG emissions	Annual Report > ESG Report > Environment section pages 32 - 43
	305-6 Emissions of ozone-depleting substances (ODS)	Not disclosed
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Not disclosed