APC Group, Inc. Sustainability Reporting Template

Contextual Information

Company Details	
Name of Organization	APC Group, Inc. (APC or the "Company")
Location of Headquarters	G/F MyTown New York Bldg., General E. Jacinto St. corner
	Capas St., Brgy. Guadalupe Nuevo, Makati City
Location of Operations	APC's Principal Address is at G/F MyTown New York Bldg.,
	General E. Jacinto St. corner Capas St., Brgy. Guadalupe Nuevo,
	Makati City
Report Boundary: Legal entities	Within APC only (parent only)
(e.g. subsidiaries) included in this	
report	
Business Model, including	Originally organized to engage in the oil and gas exploration and
Primary Activities, Brands,	development in the Philippines, APC was incorporated in the
Products, and Services	Philippines and are registered with the Philippine Securities and
	Exchange Commission (SEC) on October 15, 1993. The SEC
	approved the change in the primary purpose of the Company to
	that of a holding company on April 30, 1997.
	The Company's shares of stock are publicly traded in the
	Philippine Stock Exchange, Inc. (PSE).
Reporting Period	January 1 to December 31, 2020
Highest Ranking Person	Mr. Jackson T. Ongsip, President and Chief Executive Officer,
responsible for this report	

Materiality Process

Explain how you applied the materiality principle (or the materiality process) in identifying your material topics.

To identify our Company's material economic, environmental, social, and governance (EESG) topics, we underwent through the following process:

	1	2	3	4	5
Steps Taken	Build Corporate Capacity	Review of Business Model with Senior Management and Employees	Identify Material Topics	Prioritize Material Topics	Process Review

Description	Participation and attendance to SEC workshop on sustainability reporting, and internal training	Review of vision, operations, policies and practices, and identification of aspects which have critical impaction on the EESG		Engagement with internal and external stakeholders through dialogues and online surveys	
Materiality N	1atrix				
Influence on Stakeholder Decision and Assessment MEDIUM HIGH			•	1 - E 2 - I - I 3 - C 4 - C F 5 - H	LEGEND Economic Performance ndirect Economic Impact Compliance Corporate Governance and Risk Management Human Resource Development and Welfare Local Community Development
Гом		MEDIUM		HIGH	
LOW	Signifiance o	MEDIUM of Impact on the Ec	onomy, Society, and Envir		

ECONOMIC

Economic Performance

<u>Direct Economic Value Generated and Distributed</u>

Disclosure	Amount	Units
Direct economic value generated (revenue)	1,250,487	PhP
Direct economic value distributed:	8,661,434	
a. Operating costs	5,322,760	PhP
b. Employee wages and benefits	2,458,262	PhP

c.	Payments to suppliers, other operating costs	0	Php
d.	Dividends given to stockholders and interest payments	0	PhP
	to loan providers		
e.	Taxes given to government	880,412	PhP
f.	Investments to community (e.g. donations, CSR)	0	PhP

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Primary business operations and supply chain caused by the organization	Employees, investors/shareholders, and suppliers/business partners, government	While not yet operating, the Company acknowledges the importance of sustainability to its businesses. It aims to create a direct economic impact through the economic value it will eventually distribute to its stakeholders in its primary business operations and supply chain.
		To be able to uphold its sustainable programs, APC, through its parent company, Belle Corporation ("Belle"), has adopted a global standard guiding principle aligned to the United Nations Global Compact to ensure proper implementation current practices and to seek for further developments.
		Led by our Management, the Company pursues to reach out to its stakeholders in order to recognize their interests.
		Alongside with Belle, and other cosubsidiaries, and as part of the SM Group, the Company anchored its sustainable development strategy to the seventeen (17) Sustainable Development Goals of the United Nations.
		This approach intends to have a strategic and diverse portfolio of businesses that delivers stable and reliable economic returns, which take into consideration social development and environmental protection.

What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach
Credit, liquidity and equity price risks; environmental risks which could hamper the exploration works, and put its employees in danger	Subsidiaries; employees; business partners; suppliers; host communities	The Board reviews and approves while the Management implements policies which protect the interest of the Company and that of the subsidiaries and other stakeholders. Programs and policies on safety are established and observance to such by the employees and business partners is required APC shall maintain a safe, productive and conducive workplace and comply with all applicable health, safety and environmental laws. The Company shall endeavor to adhere to sustainable practices that ensure the protection of the environment and shall seek to deliver maximum growth with minimal and responsible consumption of
What are the Opportunity/ies	Which stakeholders are	http://www.apcaragorn.net/index.php/corporate-governance/code-of-conduct-and-ethics Management Approach
Identified?	affected?	тападетен Арргоаст
Increase of APC's shareholder value for partners and investors by seeking other renewable energy development investment opportunities	Employees, host community members, suppliers/business partners, and investors/shareholders	To be open to partnerships or joint ventures as the Company pursues exploration work program for its Kalinga project, which will provide jobs to the locals

Climate-related risks and opportunities ¹

Governance	Strategy	Risk Management	Metrics and Targets	
Not material				
Recommended Disclosures				
Not material				
Not material				

¹ Adopted from the Recommendations of the Task Force on Climate-Related Financial Disclosures. The TCFD Recommendations apply to non-financial companies and financial-sector organizations, including banks, insurance companies, asset managers and asset owners.

Not material	
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Procurement Practices

Proportion of spending on local suppliers

- Not material to the Company

Disclosure	Quantity	Units
Percentage of procurement budget used for significant locations	Not material	%
of operations that is spent on local suppliers		

	Which stakeholders are affected?	Management Approach
Not material		
<u>-</u>	Which stakeholders are affected?	Management Approach
Not material		
• • • • • • • • • • • • • • • • • • • •	Which stakeholders are affected?	Management Approach
Not material		

Anti-corruption

<u>Training on Anti-corruption Policies and Procedures</u>

Disclosure	Quantity	Units
Percentage of employees to whom the organization's anti-	100	%
corruption policies and procedures have been communicated to		
Percentage of business partners to whom the organization's	100	%
anti-corruption policies and procedures have been		
communicated to		
Percentage of directors and management that have received	100	%
anti-corruption training		
Percentage of employees that have received anti-corruption	100	%
training		

What is the impact and where	Which stakeholders are	Management Approach
does it occur? What is the	affected?	

organization's involvement in the impact?		
Established anti-corruption policies,	Employees, host	In order to provide continued protection
standards, and practices due to	community members,	to the interests of its stakeholders, the
information campaigns	suppliers/business	Board is regularly presented with updates
	partners, and	on best corporate governance practices
	investors/shareholders	and instructs the Management to update
	·	and cascade the policies to the employees
		for implementation.
		The Board has approved a policy on
		whistle-blowing that encourages
		employees to participate and work
		towards creating an environment where
		concerns can be freely raised for possible
		violations of the Company's Code of
		Business Conduct and Ethics, policies and
		laws without fear of retaliation.
		http://www.apcaragorn.net/index.php/c
		orporate-governance/company-policies
What are the Risk/s Identified?	Which stakeholders are	Management Approach
what are the histy's facilities.	affected?	management Approach
Reputational risk	Employees,	The Company regularly reviews, updates
1	Employees,	The company regularly reviews, apacies
	suppliers/business	and cascades its good governance
		and cascades its good governance policies. It also ensures its strict
	suppliers/business	and cascades its good governance policies. It also ensures its strict implementation, and application of
	suppliers/business	and cascades its good governance policies. It also ensures its strict
What are the Opportunity/ies	suppliers/business partners Which stakeholders are	and cascades its good governance policies. It also ensures its strict implementation, and application of
What are the Opportunity/ies Identified?	suppliers/business partners	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit.
Identified? To maintain and increase	suppliers/business partners Which stakeholders are	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit.
Identified? To maintain and increase stakeholders' trust and confidence	which stakeholders are affected? Employees, host community members,	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit. Management Approach The Company actively updates and cascades to its employees its policies,
Identified? To maintain and increase stakeholders' trust and confidence to the Company, which can possibly	which stakeholders are affected? Employees, host community members, suppliers/business	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit. Management Approach The Company actively updates and cascades to its employees its policies, processes, and procedures, especially on
Identified? To maintain and increase stakeholders' trust and confidence to the Company, which can possibly influence potential investors and	which stakeholders are affected? Employees, host community members, suppliers/business partners, and	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit. Management Approach The Company actively updates and cascades to its employees its policies, processes, and procedures, especially on corporate governance, particularly on
Identified? To maintain and increase stakeholders' trust and confidence to the Company, which can possibly influence potential investors and business partners, and be	which stakeholders are affected? Employees, host community members, suppliers/business	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit. Management Approach The Company actively updates and cascades to its employees its policies, processes, and procedures, especially on
Identified? To maintain and increase stakeholders' trust and confidence to the Company, which can possibly influence potential investors and business partners, and be recognized a strong supporter of	which stakeholders are affected? Employees, host community members, suppliers/business partners, and	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit. Management Approach The Company actively updates and cascades to its employees its policies, processes, and procedures, especially on corporate governance, particularly on anti-corruption.
Identified? To maintain and increase stakeholders' trust and confidence to the Company, which can possibly influence potential investors and business partners, and be	which stakeholders are affected? Employees, host community members, suppliers/business partners, and	and cascades its good governance policies. It also ensures its strict implementation, and application of sanctions as it deems fit. Management Approach The Company actively updates and cascades to its employees its policies, processes, and procedures, especially on corporate governance, particularly on

<u>Incidents of Corruption</u>

Disclosure	Quantity	Units
Number of incidents in which directors were removed or	0	#
disciplined for corruption		
Number of incidents in which employees were dismissed or	0	#
disciplined for corruption		
Number of incidents when contracts with business partners	0	#
were terminated due to incidents of corruption		

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Primary business operations and supply chain caused by the organization and through its business relationship	Employees, host community members, suppliers/business partners, and investors/shareholders	In order to provide continued protection to the interests of its stakeholders, the Board is regularly presented with updates on best corporate governance practices and instructs the Management to update and cascade the policies to the employees for implementation.
		The Board has approved a policy on whistle-blowing that encourages employees to participate and work
		towards creating an environment where concerns can be freely raised for possible
		violations of the Company's Code of Business Conduct and Ethics, policies and laws without fear of retaliation.
		http://www.apcaragorn.net/index.php/c orporate-governance/company-policies
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach
Reputational risk	Employees,	The Company regularly reviews, updates
	suppliers/business	and cascades its good governance
	partners, investors,	policies. It also ensures its strict
	shareholders	implementation, and application of sanctions as it deems fit.
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach

To maintain and increase
stakeholders' trust and confidence
to the Company, which can possibly
influence potential investors and
business partners, and be
recognized a strong supporter of
good governance practices

Employees, host community members, suppliers/business partners, and investors/shareholders

The Company actively updates and cascades to its employees its policies, processes, and procedures, especially on corporate governance, particularly on anti-corruption.

http://www.apcaragorn.net/index.php/corporate-governance/company-policies

ENVIRONMENT

Resource Management

Energy consumption within the organization:

- Not material to the Company

Disclosure	Quantity	Units
Energy consumption (renewable sources)	Not material	GJ
Energy consumption (gasoline)	Not material	GJ
Energy consumption (LPG)	Not material	GJ
Energy consumption (diesel)	Not material	GJ
Energy consumption (electricity)	Not material	kWh

Reduction of energy consumption

- Not material to the Company

Disclosure	Quantity	Units
Energy reduction (gasoline)	Not material	GJ
Energy reduction (LPG)	Not material	GJ
Energy reduction (diesel)	Not material	GJ
Energy reduction (electricity)	Not material	kWh
Energy reduction (gasoline)	Not material	GJ

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Not material		
•	Which stakeholders are affected?	Management Approach
Not material		
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach
Not material		

Water consumption within the organization

Disclosure	Quantity	Units
2.00.000.0	~,	UU

Water withdrawal	Not material	Cubic
		meters
Water consumption	Not material	Cubic
		meters
Water recycled and reused	Not material	Cubic
		meters

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Not material		
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach
Not material		
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach
Not material		

Materials used by the organization

Disclosure	Quantity	Units
Materials used by weight or volume		
renewable	Not material	kg/liters
non-renewable	Not material	kg/liters
Percentage of recycled input materials used to manufacture the organization's primary products and services	Not material	%

•	Which stakeholders are affected?	Management Approach
Not material		
•	Which stakeholders are affected?	Management Approach
Not material		

• • • • • • • • • • • • • • • • • • • •	Which stakeholders are affected?	Management Approach
Not material		

Ecosystems and biodiversity (whether in upland/watershed or coastal/marine)

- Not material to the Company

Disclosure	Quantity	Units
Operational sites owned, leased, managed in, or adjacent to,	(identify all sites)	
protected areas and areas of high biodiversity value outside	Not material	
protected areas		
Habitats protected or restored	Not material	На
IUCN2 Red List species and national conservation list species	(list)	
with habitats in areas affected by operations	Not material	

P1111	Which stakeholders are affected?	Management Approach
Not material		
<u>-</u>	Which stakeholders are affected?	Management Approach
Not material		
• • • • • • • • • • • • • • • • • • • •	Which stakeholders are affected?	Management Approach
Not material		

Environmental impact management

Air Emissions

GHG

Disclosure	Quantity	Units
Direct (Scope 1) GHG Emissions	Not material	Tonnes
		CO2e

² International Union for Conservation of Nature

Energy indirect (Scope 2) GHG Emissions	Not material	Tonnes
		CO2e
Emissions of ozone-depleting substances (ODS)	Not material	Tonnes

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Not material		
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach
Not material		
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach
Not material		

<u>Air pollutants</u>

Disclosure	Quantity	Units
NOx	Not material	kg
SOx	Not material	kg
Persistent organic pollutants (POPs)	Not material	kg
Volatile organic compounds (VOCs)	Not material	kg
Hazardous air pollutants (HAPs)	Not material	kg
Particulate matter (PM)	Not material	kg

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Not material		
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach
Not material		
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach

Not material	

Solid and Hazardous Wastes

Solid Waste

- Not material to the Company

Disclosure	Quantity	Units
Total solid waste generated	Not material	kg
Reusable	Not material	kg
Recyclable	Not material	kg
Composted	Not material	kg
Incinerated	Not material	kg
Residuals/Landfilled	Not material	kg

•	Which stakeholders are affected?	Management Approach
Not material		
	Which stakeholders are affected?	Management Approach
Not material		
"	Which stakeholders are affected?	Management Approach
Not material		

<u>Hazardous Waste</u>

Disclosure	Quantity	Units
Total weight of hazardous waste generated	Not material	kg
Total weight of hazardous waste transported	Not material	kg

		Management Approach
	affected?	
organization's involvement in the		
impact?		
Not material		

•	Which stakeholders are affected?	Management Approach
Not material		
• • • • • • • • • • • • • • • • • • • •	Which stakeholders are affected?	Management Approach
Not material		

<u>Effluents</u>

- Not material to the Company

Disclosure	Quantity	Units
Total volume of water discharges	Not material	Cubic
		meters
Percent of wastewater recycled	Not material	%

	Which stakeholders are affected?	Management Approach
Not material		
•	Which stakeholders are affected?	Management Approach
Not material		
"	Which stakeholders are affected?	Management Approach
Not material		

Environmental compliance

Non-compliance with Environmental Laws and Regulations

Disclosure	Quantity	Units
Total amount of monetary fines for non-compliance with	Not material	PhP
environmental laws and/or regulations		
No. of non-monetary sanctions for non-compliance with	Not material	#
environmental laws and/or regulations		
No. of cases resolved through dispute resolution mechanism	Not material	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Not material		
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach
Not material		
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach
Not material		

SOCIAL

Employee Management

Employee Hiring and Benefits

Employee data

Disclosure	Quantity	Units
Total number of employees ³	3	
a. Number of female employees	1	#
b. Number of male employees	2	#
Attrition rate ⁴	0%	rate
Ratio of lowest paid employee against minimum wage	1:2.19	ratio

Employee benefits

List of Benefits	Y/N	% of female employees who availed for the	% of male employees who availed for the
		year	year
SSS	Υ	100%	50%
PhilHealth	Υ	0%	50%
Pag-ibig	Υ	0%	50%
Parental leaves	Υ	0%	0%
Vacation leaves	Y	100%	100%
Sick leaves	Y	100%	100%

³ Employees are individuals who are in an employment relationship with the organization, according to national law or its application (GRI Standards 2016 Glossary)

Attrition are = (no. of new hires – no. of turnover)/(average of total no. of employees of previous year and total no. of employees of current

year)

Medical benefits (aside from	Y	100%	100%
PhilHealth))			
Housing assistance (aside from Pag-	N	-	-
ibig)			
Retirement fund (aside from SSS)	Y	0%	0%
Further education support	N	-	-
Company stock options	N	-	-
Telecommuting	N	-	-
Flexible-working Hours	Υ	0%	100%
(Others)	Ν	-	-

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Primary business operations caused by the organization — Having an average of 7 years of retention among the employees	APC values and gives importance to its employees by empowering them and fulfilling their career aspirations to help progress their capabilities, and to encourage loyalty, dedication, passion and productivity at work. The Company also believes that investing in its people and developing a diverse talent pool are critical to its success and growth. APC provides resources, services and facilities to equip its employees with the necessary knowledge and skills to better perform their duties as well as offer them various opportunities to continuously enhance their professional knowledge and skills, and to improve themselves as individuals and as members of the community.
	The Company also exerts its best efforts to maintain a climate conducive to working and provides a substantial level of job security, benefits and personal rewards for their employees. The performance evaluation system has been designed and established to provide a common and equitable basis for evaluating the performance of individual employees. It also implements policies on promotions and salary adjustments in support of APC's aim to empower and fulfill career aspirations of employees.
What are the Risk/s Identified?	Management Approach

pay	developments and enhancements, particularly on employment, benefits and other perquisites.
To motivate talents, and to assure internal equity in	Constant exploration of human resource
What are the Opportunity/ies Identified?	Management Approach
	http://www.apcaragorn.net/index.php/corporate -governance/code-of-conduct-and-ethics
Higher attrition rate which could affect the business operations and delivery of services; additional costs to be incurred due to the need to train employees	APC treats its employees fairly by providing them with opportunities for career development and advancement based on merit, regardless of gender, age, religion.

Employee Training and Development

Disclosure	Quantity	Units
Total training hours provided to employees		
a. Female employees	0	hours
b. Male employees	0	hours
Average training hours provided to employees		
a. Female employees	0	hours/employee
b. Male employees	0	hours/employee

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Primary business operations caused by the organization — having a pool of specialized team players	APC values and gives importance to its employees by empowering them and fulfilling their career aspirations to help progress their capabilities, and to encourage loyalty, dedication, passion and productivity at work. The Company also believes that investing in its people and developing a diverse talent pool are critical to its success and growth. APC provides resources, services and facilities to equip its employees with the necessary knowledge and skills to better perform their duties as well as offer them various opportunities to continuously enhance their professional knowledge and skills, and to improve themselves as individuals and as members of the community.
	Upon being hired, an employee undergoes induction and orientation as may be determined

	by the Company. Each newly hired employee is
	introduced to the organization and is oriented on
	the personnel policies, quidelines and benefits
	, , , , , , , , , , , , , , , , , , , ,
	through a Corporate Orientation Program. An
	annual mandated Corporate Training is also done
	to refresh employees on Company Codes and
	Policies. Specific technical training and
	compliance to Continuing Professional
	Development are among Management's
	approach to ensure learning and development of
	employees.
What are the Risk/s Identified?	Management Approach
Higher attrition rate which could affect the business	APC treats its employees fairly by providing them
operations and delivery of services; additional costs to	with opportunities for career development and
be incurred due to the need to train employees	advancement based on merit, regardless of
	gender, age, religion.
	http://www.apcaragorn.net/index.php/corporate
	-governance/code-of-conduct-and-ethics
What are the Opportunity/ies Identified?	Management Approach
Obtaining home-grown professionals equipped for	Constant exploration of human resource
career advancement/succession	
cureer advancement/succession	developments and enhancements, particularly on

Labor-Management Relations

Disclosure	Quantity	Units
% of employees covered with Collective Bargaining	0	%
Agreements		
Number of consultations conducted with employees	0	#
concerning employee-related policies		

What is the impact and where does it occur? What	Management Approach
is the organization's involvement in the impact?	
Primary business operations caused by the	Open communication lines amongst the
organization and through the business relationship –	Company's directors and management, and
effective cooperation between the management and	management and employees are maintained.
labor workforce	
	It is also a goal and part of the mission of the
	Company to enhance the positive atmosphere of
	open communication and the maintenance of a
	productive work environment conducive to high

	performance and harmonious employer-employee relationship.
What are the Risk/s Identified?	Management Approach
Disagreements between management and employees leading to disruption of business operations and ultimately suspension of services	Code of Business Conduct and Ethics (the "CBCE") was established to serve as a guideline for employee discipline and forms the grounds for disciplinary actions. The CBCE was also put in place to serve as a guide for directors, management, employees and other concerned stakeholders relative to the performance of their duties and responsibilities, as well as for all business dealings with the Company. http://www.apcaragorn.net/index.php/corporate-governance/code-of-conduct-and-ethics
What are the Opportunity/ies Identified?	Management Approach
A clear and unified impartment of directions to attain the Company's goals	Preserved communication mechanisms, and continuous look-out improvement

Diversity and Equal Opportunity

Disclosure	Quantity	Units
% of female workers in the workforce	33%	%
% of male workers in the workforce	67%	%
Number of employees from indigenous communities and/or	0	#
vulnerable sector*		

^{*}Vulnerable sector includes, elderly, persons with disabilities, vulnerable women, refugees, migrants, internally displaced persons, people living with HIV and other diseases, solo parents, and the poor or the base of the pyramid (BOP; Class D and E).

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Primary business operations caused by the organization — Variety of equally-treated individuals with diverse approach and viewpoint to realize a common goal	The Company provides equal opportunities for its employees, regardless of age, gender, or creed and adopted policies, which promote and observe diversity to and equality throughout the organization.
	http://www.apcaragorn.net/index.php/corporate -governance/company-policies

	APC encourages respect amongst its employees by setting policies and codes that support diversity in the workplace. It adheres to labor standards that support vulnerable sectors of the community (RA 9710), (RA 9262), and etc.
What are the Risk/s Identified?	Management Approach
Discrimination in the workplace	Whether in selection of the countries and markets where the Company operates, hiring and promotion of employees, selection of suppliers and contractors – the Company decides on the basis of merit and value to shareholders and does not discriminate on the basis of race, ethnicity, religion, or gender.
	All board members, officers, and employees are prohibited from practicing any form of discrimination or harassment in the workplace. This obligation to refrain from such behavior extends to contractors, vendors, suppliers, or visitors, to the extent that their conduct affects the work environment.
	http://www.apcaragorn.net/index.php/corporate-governance/code-of-conduct-and-ethics
What are the Opportunity/ies Identified?	Management Approach
Capturing different perspectives and ideas, with equal appreciation, with the intention of achieving the Company's goals	Interminable improvement of the Company's policies on governance, particularly on diversity and equality

Workplace Conditions, Labor Standards, and Human Rights

Occupational Health and Safety

Disclosure	Quantity	Units
Safe Man-Hours	8,670*	Man-hours
No. of work-related injuries	0	#
No. of work-related fatalities	0	#
No. of work related ill-health	0	#
No. of safety drills	2	#

^{*}full year

What is the impact and where does it occur? What	Management Approach
is the organization's involvement in the impact?	

Primary business operations caused by the	Strict compliance of the Company's safety, health
organization – having active and fit employees, and	and welfare policy.
harm-free working environment	
	The Company provides medical/clinical benefits to all employees. Employees are entitled to a free standard check up in the Medical Clinic and are provided the available medicine supplies at the Company Clinic.
	The Company also implements and conducts various health-related activities and programs including but not limited to Drug-Free Workplace, Family Welfare Program, HIV and AIDS Prevention and Control in the Workplace Program, Workplace Policy on Hepatitis B, Program on Tuberculosis Prevention and Control in the Workplace, Covid 19 tests, and the like.
What are the Risk/s Identified?	Management Approach
Due to the nature of our operations, the risk of injury is minimal.	While there is nominal risk identified, continuous review and updating, as needed, of requirements to compliance is done
What are the Opportunity/ies identified?	Management Approach
A more motivating and secured working atmosphere for the employees	Continuing feedback mechanisms to consider/acknowledge insights from employees

Labor Laws and Human Rights

Disclosure	Quantity	Units
No. of legal actions or employee grievances involving forced	0	#
or child labor		

Do you have policies that explicitly disallows violations of labor laws and human rights (e.g. harassment, bullying) in the workplace?

Topic	Y/N	If Yes, cite reference in the company policy
Forced labor	Υ	The Company's Code of Business Conduct and Ethics
Child labor	Υ	espouses the adherence to compliance with best
Human Rights	Y	corporate governance practices and standards, and applicable laws, rules and regulations. This covers ethical practices such as but not limited to support for diversity and non-discrimination, employee

welfare, among others. The Company also has policies, which are regularly updated and uploaded in its website.
http://www.apcaragorn.net/index.php/corporate- governance/code-of-conduct-and-ethics
http://www.apcaragorn.net/index.php/corporate-governance/company-policies

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Good standing for moral values for recognizing labor	Pursue observance to pertinent rules, and regular
laws and human rights	look-out for relevant issuances.
	http://www.apcaragorn.net/index.php/corporate
	-governance/manual-on-corporate-governance
What are the Risk/s Identified?	Management Approach
Risk of violation of labor laws leading to possible filing	APC adheres to labor laws and protection of
of lawsuits; loss of confidence from investors;	human rights as much as violations done by
demoralized employees	employees are not tolerated.
	http://www.apcaragorn.net/index.php/corporate
	-governance/manual-on-corporate-governance
What are the Opportunity/ies Identified?	Management Approach
To further the employees and other stakeholders'	Issuance of certification of full compliance, and
certainty and optimism towards the Management's	confirmation of data with zero complaints,
labor laws and human rights initiatives	through various reports

Supply Chain Management

- Not material to the Company

Do you have a supplier accreditation policy? If yes, please attach the policy or link to the policy:

Do you consider the following sustainability topics when accrediting suppliers?

Topic	Y/N	If Yes, cite reference in the supplier policy
Environmental performance	Not material	
Forced labor	Not material	

Child labor	Not material	
Human rights	Not material	
Bribery and corruption	Not material	

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not material	
What are the Risk/s Identified?	Management Approach
Not material	
What are the Opportunity/ies Identified?	Management Approach
Not material	

Relationship with Community

Significant Impacts on Local Communities

Operations with significant (positive or negative) impacts on local communities (exclude CSR projects; this has to be business operations)	Location	Vulnerable groups (if applicable)*	Does the particular operation have impacts on indigenous people (Y/N)?	Collective or individual rights that have been identified that or particular concern for the community	Mitigating measures (if negative) or enhancement measures (if positive)
Not material					

^{*}Vulnerable sector includes children and youth, elderly, persons with disabilities, vulnerable women, refugees, migrants, internally displaced persons, people living with HIV and other diseases, solo parents, and the poor or the base of the pyramid (BOP; Class D and E)

For operations that are affecting IPs, indicate the total number of Free and Prior Informed Consent (FPIC
undergoing consultations and Certification Preconditions (CPs) secured and still operational and provide
a copy or link to the certificates if available:

Certificates	Quantity	Units

FPIC process is still undergoing	Not material	#
CP secured	Not material	#

What are the Risk/s Identified?	Management Approach
Not material	
What are the Opportunity/ies Identified?	Management Approach
Not material	

Customer Management

Customer Satisfaction

- Not material to the Company

Disclosure	Score	Did a third party conduct the customer satisfaction study (Y/N)?
Customer satisfaction	Not material	

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not material	
What are the Risk/s Identified?	Management Approach
Not material	
What are the Opportunity/ies Identified?	Management Approach
Not material	

Health and Safety

Disclosure	Quantity	Units
No. of substantiated complaints on product or service	Not material	#
health and safety*		
No. of complaints addressed	Not material	#

^{*}Substantiated complaints include complaints from customers that went through the organization's formal communication channels and grievance mechanisms as well as complaints that were lodged to and acted upon by government agencies.

What is the impact and where does it occur? What	Management Approach
is the organization's involvement in the impact?	

Not material	
What are the Risk/s Identified?	Management Approach
Not material	
What are the Opportunity/ies Identified?	Management Approach
Not material	

Marketing and labelling

- Not material to the Company

Disclosure	Quantity	Units
No. of substantiated complaints on marketing and	Not material	#
labelling*		
No. of complaints addressed	Not material	#

^{*}Substantiated complaints include complaints from customers that went through the organization's formal communication channels and grievance mechanisms as well as complaints that were lodged to and acted upon by government agencies.

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not material	
What are the Risk/s Identified?	Management Approach
Not material	
What are the Opportunity/ies Identified?	Management Approach
Not material	

Customer privacy

Disclosure	Quantity	Units
No. of substantiated complaints on customer privacy*	Not material	#
No. of complaints addressed	Not material	#
No. of customers, users and account holders whose	Not material	#
information is used for secondary purposes		

^{*}Substantiated complaints include complaints from customers that went through the organization's formal communication channels and grievance mechanisms as well as complaints that were lodged to and acted upon by government agencies.

What is the impact and where does it occur? What is the organization's involvement in the impact?	Management Approach
Not material	
What are the Risk/s Identified?	Management Approach
Not material	
What are the Opportunity/ies Identified?	Management Approach
Not material	

Data Security

- Not material to the Company

Disclosure	Quantity	Units
No. of data breaches, including leaks, thefts and losses	Not material	#
of data		

•	Management Approach
is the organization's involvement in the impact?	
Not material	
What are the Risk/s Identified?	Management Approach
Not material	
What are the Opportunity/ies Identified?	Management Approach
Not material	

Compliance

Non-compliance with Laws and Regulations

Disclosure	Quantity	Units
Total amount of monetary fines for non-compliance with laws	0	PhP
and/or regulations		
No. of non-monetary sanctions for non-compliance with laws	0	#
and/or regulations		
No. of cases resolved through dispute resolution mechanism	0	#

What is the impact and where does it occur? What is the organization's involvement in the impact?	Which stakeholders are affected?	Management Approach
Full compliance with the Company's Manual on Corporate Governance, which that adheres compliance with best corporate governance practices and standards, and applicable laws, rules and regulations.	Employees, host community members, suppliers/business partners, investors/shareholders, and regulators	The Board has been identifying areas of continuing education on corporate governance topics. To keep the Board and key officers well-informed of good governance practices and standards, regular annual education programs are conducted in coordination with its parent company and training providers duly accredited by the SEC, while employees and business partners are being informed of the Company's governance-related policies and practices upon on-boarding and timely updates.
What are the Risk/s Identified?	Which stakeholders are affected?	Management Approach
Although laws and regulations are enacted for the common benefit, changes to these laws and regulations may create negative effects to the operating and financial condition of APC.	Employees, host community members, suppliers/business partners, investors/shareholders, and regulators	In order to mitigate, the Company continues to exercise fiscal prudence and adopts what it considers conservative financial and operational controls.
What are the Opportunity/ies Identified?	Which stakeholders are affected?	Management Approach
to the Company, which can possibly	Employees, host community members, suppliers/business partners, and investors/shareholders	The Company continues to seek for improvements on its policies, processes, procedures on corporate governance and sustainability as it affirms its commitment to the enhancement of its stakeholder value.

Local Community Development

Disclosure	Quantity	Units	
Number of direct beneficiaries of corporate social responsibility		Not material	#
initiative/s			
Number of communities benefitted from corporate s responsibility initiative/s	Not material	#	
	Management Approach		
What is the impact and where does it occur? What is the organization's involvement in the impact?			
Not material			
What are the Risk/s Identified?	Management Approach		
Not material			
What are the Opportunity/ies Identified?	Management Approach		
Not material			

UN SUSTAINABLE DEVELOPMENT GOALS

Product or Service Contribution to UN SDGs

Key products and services and its contribution to sustainable development.

Key Products and	Societal Value /	Potential Negative	Management Approach
Services	Contribution to UN SDGs	Impact of Contribution	to Negative Impact
Please refer to the	SDG 1: No Poverty	In spite the Company's	To pay taxes which help
Business Model,		contributions, it can	provide sustainable and
including Primary	P880,412 taxes paid in	only cover limited areas	inclusive growth.
Activities, Brands,	2020		
Products, and	SDG 8: Decent Work and	Insufficient	The Company prioritizes
Services, under	Economic Growth	opportunities for	the welfare of its
Contextual		vulnerable sector	employees, recognizes
Information of this	P1.3M revenues		its top performers and
Report	generated in 2020		provides a safe and
			healthy working

	environment. It also aspires to be an employer of choice by providing benefits, career growth, training and work-life balance, engagement programs, among others.
	APC also developed various policies (please refer to the following links) to implement and ensure that overall employee and other stakeholders' welfare and interests are being valued.

^{*} None/Not Applicable is not an acceptable answer. For holding companies, the services and products of its subsidiaries may be disclosed.