

APPENDIX II – CONTENT INDEX FOR SUSTAINABILITY REPORTING GUIDELINES

The content index includes two parts: Part I are the KPIs for the Hong Kong Stock Exchange Environmental, Social and Governance Reporting Guide (HKEx ESG Guide) and Part II is according to GRI-G4 Indicators and Disclosures on Management Approach. We also made reference to the

International Association of Public Transport (UITP) Sustainability Charter Reporting Guide 1.0 and ISO26000.

Part I: HKEx ESG Guides Content Index

		Disclosure level			Website Location	External Assurance	Explanation
		Full	Partial	None			
General disclosures							
Aspect A1 Emissions and waste	Policies and compliance with laws and regulations relating to air quality and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.		X		Environment Management Approach Mitigation Waste Corporate Policies		In line with the outcomes of our materiality assessment , our sustainability report focuses on management of greenhouse gas (GHG) emissions and waste. However please note that policies and legal compliance relating to NO ₂ , SO ₂ and particulate matter emissions and discharges on land fall within the remit of our management processes for the Environment, including EIA and EMS.
Aspect A2 Use of resources	Policies on efficient use of resources, including energy, water and other raw materials.	X			Environment Management Approach Sustainable Resource Use		
Aspect A3 Environment and natural resources	Policies on minimising significant impacts on the environment and natural resources.		X		Environment Management Approach Sustainable Resource Use Mitigation Waste Climate Change Environmental Protection Corporate Policies Supply Chain Introduction		
Aspect B1 Employment	Policies and compliance with laws and regulations relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.		X		Corporate Policies Fair and Ethical Business Our People Staff Management Approach		

		Disclosure level			Website Location	External Assurance	Explanation
		Full	Partial	None			
Aspect B2 Health and safety	Policies and compliance with laws and regulations relating to providing a safe working environment and protecting employees from occupational hazards.	X			Safety Management Approach Staff and Contractor Safety		
Aspect B3 Development and training	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	X			Staff Management Approach Recruitment in Hong Kong Training and Development		
Aspect B4 Labour standards	Policies and compliance with laws and regulations relating to preventing child and forced labour.	X			Supply Chain Introduction		This Aspect applies to management of our supply chain only as there is no risk of child or forced labour occurring within our organisation.
Aspect B5 Supply chain management	Policies on managing environmental and social risks of the supply chain.	X			Supply Chain Introduction Engagement and Collaboration with Suppliers		
Aspect B6 Product responsibility	Policies; and compliance with laws and regulations relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.		X		Safety Management Approach Customer Safety Initiatives Customers Management Approach		In line with the outcomes of our materiality assessment , our sustainability report focuses on policies and compliance relating to health and safety. In addition, our privacy policy is available on our customer website.
Aspect B7 Anti-corruption	Policies and compliance with laws and regulations relating to bribery, extortion, fraud and money laundering.	X			Corporate Policies Code of Conduct Anti-Corruption and Whistle-Blowing		
Aspect B8 Community investment	Policies on community engagement to understand the needs of the communities where we operate and to ensure that our activities take into consideration the communities' interests.	X			Community Introduction		

		Disclosure level			Website Location	External Assurance	Explanation
		Full	Partial	None			
Other comply or explain provisions							
Aspect A1 Emissions and waste							
A1.1	The types of emissions and respective emissions data.			X			Emissions of NO2, SO2 and particulate matter from gaseous fuel and vehicles are not determined to be <u>Highly material issues</u> for our organisation.
A1.2	Greenhouse gas emissions in total (in tonnes) and where appropriate, intensity (e.g. per unit of production volume, per facility).	X			<u>Mitigation</u> <u>Environmental Performance</u>	#	
A1.3	Total hazardous waste produced (in tonnes) and where appropriate, intensity (e.g. per unit of production volume, per facility).	X			<u>Environmental Performance</u>	#	
A1.4	Total non-hazardous waste produced (in tonnes) and where appropriate, intensity (e.g. per unit of production volume, per facility).		X		<u>Waste</u> <u>Environmental Performance</u>		In line with the outcomes of our <u>materiality assessment</u> , our sustainability report provides information on construction and general waste from railway extension projects, as well as metals recycling from railway operations. We are working in the medium-term to provide more information about the breakdown of waste.
A1.5	Description of measures to mitigate emissions and results achieved.	X			<u>Mitigation</u> <u>Environmental Performance</u>		
A1.6	Description of how hazardous and non-hazardous wastes are handled, reduction initiatives and results achieved.		X		<u>Waste</u>		With regards to chemical waste, mostly associated with spent oil and used batteries, the Company complies with the Hong Kong Waste Disposal (Chemical Waste) (General) Regulation (Cap. 354) and works with registered contractors who possess a valid Chemical Waste Collector License as required by Hong Kong Environmental Protection Department (EPD).
Aspect A2 Use of resources							
A2.1	Energy consumption by type (e.g. electricity, gas or oil) in total (kwh in '000s) and intensity (e.g. per unit of production volume, per facility).	X			<u>Sustainable Resource Use</u> <u>Environmental Performance</u>		
A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).		X		<u>Water Consumption</u> <u>Environmental Performance</u>		In line with the outcomes of our <u>materiality assessment</u> , our sustainability report provides information on water consumption in railway operations and in management and investment properties.
A2.3	Description of energy use efficiency initiatives and results achieved.	X			<u>Energy Saving Measures</u>		

		Disclosure level			Website Location	External Assurance	Explanation
		Full	Partial	None			
A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency initiatives and results achieved.		X		Water Consumption		Sourcing water that is fit for purpose and water efficiency initiatives are not determined to be Highly <u>material issues</u> for our organisation.
A2.5	Total packaging material used (in tonnes), and if applicable, with reference to per unit produced.			X			Use of packaging material is not determined to be a Highly <u>material issue</u> for our organisation.
Aspect A3 The environment and natural resources							
A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	X			Environment Introduction Sustainable Resource Use Climate Change Environmental Protection Corporate Policies Supply Chain Introduction		
Recommended disclosures							
Aspect B1 Employment							
B1.1	Total workforce by gender, employment type, age group and geographical region.	X			Our People Social Performance		We disclose data on full-time employees of the Company in Hong Kong, including staff of our Hong Kong subsidiary Ngong Ping 360 but excluding part-time staff and staff of other subsidiaries. Our sustainability report also provides additional information about the employees of our international subsidiaries in Shenzhen , Stockholm and Melbourne .
B1.2	Employee turnover rate by gender, age group and geographical region.	X			Our People Social Performance		
Aspect B2 Health and safety							
B2.1	Fatality number and rate.	X			Staff and Contractor Safety Performance Safety Targets and Performance	#	
B2.2	Lost days due to work injury.	X			Staff and Contractor Safety Performance Safety Targets and Performance	#	
B2.3	Description of occupational health and safety measures adopted how they are implemented and monitored.	X			Safety Management Approach Staff and Contractor Safety		

		Disclosure level			Website Location	External Assurance	Explanation
		Full	Partial	None			
Aspect B3 Development and training							
B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management, etc.).	X			Social Performance	#	
B3.2	The average training hours completed per employee by gender and employee category.	X			Staff Training and Development Programmes Social Performance	#	
Aspect B4 Labour standards							
B4.1	Description of measures to review employment practices to avoid child and forced labour.		X		Supply Chain Introduction Supply Chain Assessment		This Aspect applies to management of our supply chain only as we believe there is no risk of child or forced labour occurring within our organisation.
B4.2	Description of steps taken to eliminate such practices when discovered.			X			No such practices have been discovered.
Aspect B5 Supply chain management							
B5.1	Number of suppliers by geographical region.	X			Social Performance	#	
B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	X			Supply Chain Introduction Supply Chain Assessment		
Aspect B6 Product responsibility							
B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.			X	Train Service Performance	*	This KPI is not relevant to our businesses. We report on our transport service delivery performance to demonstrate our commitment to providing safe and reliable services to our customers. Refer to Train Service Performance section for more details.
B6.2	Number of products and service related complaints received and how they are dealt with.		X		Customers Management Approach		
B6.3	Description of practices relating to observing and protecting intellectual property rights.			X			Intellectual property is not determined to be a Highly material issue for our organisation.

		Disclosure level			Website Location	External Assurance	Explanation
		Full	Partial	None			
B6.4	Description of quality assurance process and recall procedures.	X			Safety Management Approach A Safe System for All		
B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.		X		Please see explanation		Our privacy policy is available on our customer website. Implementation and monitoring of consumer data protection and privacy are not determined to be Highly material issues for our organisation.
Aspect B7 Anti-corruption							
B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	X			Social Performance		
B7.2	Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored.	X			Anti-Corruption and Whistle-Blowing		
Aspect B8 Community investment							
B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	X			Community Engagement Investing in Our Communities		
B8.2	Resources contributed (e.g. money or time) to the focus area.	X			Investing in Our Communities Social Performance		

#These KPIs have been assured by Deloitte.

*The KPIs have been assured by Bureau Veritas Certification.

Part II: GRI Content Index

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Strategy and Analysis							
G4-1	CEO statement	4.7, 6.2, 7.4.2			Chairman's Message CEO Letter		
G4-2	Key sustainability impacts, risks, and opportunities		Gov 10		Chairman's Message CEO Letter		
Organisational Profile							
G4-3	Name of the organisation				About MTR Corporation		
G4-4	Primary brands, products, and/ or services		Eco 2		About MTR Corporation Our Businesses		
G4-5	Headquarters				About MTR Corporation		
G4-6	Countries of operation				Our Businesses		
G4-7	Nature of ownership and legal form				About MTR Corporation		
G4-8	Markets served				Our Businesses		
G4-9	Scale of the organisation	6.3.10, 6.4.1-6.4.5, 6.8.5, 7.8	Eco 1		About MTR Corporation Economic and Financial Performance Highlights Our People Customers Introduction Consolidated Financial and Economic Performance Social Performance		
G4-10	Workforce profile		Soc 13, Soc 14, Eco 16		Our People Recruitment in Hong Kong		There are no significant variations in employment numbers, such as seasonal variations.
G4-11	Collective Bargaining		Gov 6, Gov 11, Soc 3		Staff Management Approach		
G4-12	Supply chain description				Value Chain Supply Chain Introduction Social Performance		

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
G4-13	Significant changes during the reporting period				Please refer to comment.		There were no significant changes during the reporting period.
G4-14	Precautionary approach		Gov 10		Corporate Governance Management Approach Risk Management		
G4-15	Externally-developed charters, principles or initiatives	6.3.10, 6.4.1-6.4.5, 6.8.5, 7.8			Corporate Governance Management Approach MTR External Charters and Memberships		
G4-16	Membership of external associations				Corporate Governance Management Approach MTR External Charters and Memberships		
Identified Material Aspects and Boundaries							
G4-17	Entities included in consolidated financial statements				Please refer to our Annual Report		
G4-18	Defining the report content		Gov 18		Value Chain, Materiality and Stakeholder Engagement		
G4-19	List of material aspects				Materiality List of Identified Material Aspects and Boundaries		
G4-20	Aspect boundary within the organisation	5.2, 7.3.2, 7.3.3, 7.3.4			Scope of this Report List of Identified Material Aspects and Boundaries		
G4-21	Aspect boundary outside the organisation				Scope of this Report List of Identified Material Aspects and Boundaries		
G4-22	Restatements of information				Please refer to comment.		There have been no restatements of information.
G4-23	Significant changes in the scope and aspect boundaries				Please refer to comment.		Our ESG Issue #20 (Conditions of work & social protection) has been mapped to GRI Aspect: Employment

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Stakeholder Engagement							
G4-24	List of stakeholder groups engaged		Gov 6		Materiality		
G4-25	Identification and selection of stakeholders		Gov 6		Value Chain Materiality		
G4-26	Approaches to Stakeholder Engagement	5.3,	Gov 6		Value Chain Materiality		
G4-27	Key topics and concerns raised through stakeholder engagement and how the organisation has responded				Value Chain Materiality		
Report Profile							
G4-28	Reporting period				Scope of this Report		
G4-29	Date of most recent previous report				About this Report		
G4-30	Reporting cycle				About this Report		
G4-31	Contact point for questions	7.5.3, 7.6.2,			Contact Us		
G4-32	In accordance' option and GRI Content Index		Gov 18		About this Report		
G4-33	External assurance		Gov 3		Independent Assurance	#	
Governance							
G4-34	Governance structure	6.2, 7.4.3, 7.7.5	Gov 1, Gov 2, Gov 5	Organisational governance structure and process (1)	Corporate Governance Introduction		
Ethics and Integrity							
G4-56	Values, principles, standards and norms of behaviour	4.4, 6.6.3	Gov 5, Gov 11	Fair operating practices (2)	Vision, Mission and Values Corporate Policies Fair and Ethical Business		

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Specific Standard Disclosures for Material Aspects							
Economic Performance							
G4-DMA	Disclosure of management approach				Financial and Economic Performance Introduction		
G4-EC2	Risks and opportunities due to climate change	6.5.5,	Gov 10	Climate change (26)	Climate Change		
G4-EC4	Financial assistance received from Government	-		Payment from government/ tax payment (30)	Materiality Rail plus Property Model		
Indirect Economic Impacts							
G4-DMA	Disclosure of management approach				Community Introduction Value Chain		
G4-EC7	Development and impact of infrastructure investments and services supported	6.3.9, 6.8.1-6.8.2, 6.8.7, 6.8.9		Access to essential services (12)	Our Businesses Community Introduction Customers Introduction Train Service Performance Building Our Future Introduction		
Procurement Practices							
G4-DMA	Disclosure of management approach		Gov 13		Supply Chain Introduction		
Energy							
G4-DMA	Disclosure of management approach		Env 1		Environment Management Approach		
G4-EN3	Energy consumption within the organization	6.5.4,	Env 3, Env 4		Sustainable Resource Use Environmental Performance		
G4-EN5	Energy intensity	6.5.4,			Sustainable Resource Use		
G4-EN6	Reduction of energy consumption	6.5.4, 6.5.5	Env 20	Sustainable resource use (25)			
G4-EN7	Reductions in energy requirements of products and services	6.5.4, 6.5.5			Energy Saving Measures		

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Water							
G4-DMA	Disclosure of management approach		Env 1		Environment Management Approach		All water is sourced from municipal water supplies.
G4-EN8	Total water withdrawal by source	6.5.4		Sustainable resource use (25)	Water Consumption Environmental Performance		
Biodiversity							
G4-DMA	Disclosure of management approach		Env 1, Env 2	Biodiversity (27)	Environment Management Approach Ecology Corporate Policies		
G4-EN11	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	6.5.6			Ecology		
G4-EN13	Habitats protected or restored	6.5.6			Ecology		
Emissions							
G4-DMA	Disclosure of management approach		Env 1		Environment Management Approach Mitigation Corporate Policies		Offsets are not used to meet reduction targets.
G4-EN15	Direct greenhouse gas (GHG) emissions (Scope 1)	6.5.5	Env 7			#	
G4-EN16	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	6.5.5	Env 7	Climate change (26)	Mitigation Environmental Performance	#	
G4-EN17	Other indirect greenhouse gas (GHG) emissions (Scope 3)	6.5.5	Env 7			#	

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Effluents And Waste							
G4-DMA	Disclosure of management approach		Gov 15, Env 1		Environment Management Approach		
G4-EN23	Total weight of waste by type and disposal method	6.5.3		Prevention of pollution (24)	Waste Environmental Protection		This indicator is partially disclosed because complete information about the breakdown of waste is not available. In regards to chemical waste, mostly associated with spent oil and used batteries, the Company complies with the Hong Kong Waste Disposal (Chemical Waste) (General) Regulation (Cap. 354) and works with registered contractors who possess a valid Chemical Waste Collector License as required by Hong Kong Environmental Protection Department (EPD).
Products And Services							
G4-DMA	Disclosure of management approach		Gov 8, Env 1		Environment Introduction Sustainable Resource Use		
G4-EN27	Mitigation of environmental impacts of products and services	6.5.3, 6.5.4, 6.5.5, 6.7.5		Sustainable products & services (9)	Climate Change Environmental Protection Corporate Policies Supply Chain Introduction		
Compliance - Environmental							
G4-DMA	Disclosure of management approach		Gov 8		Environment Management Approach		
G4-EN29	Non-compliance with environmental laws and regulations	4.6		Prevention of pollution (24)	Social Performance		
Supplier Environmental Assessment							
G4-DMA	Disclosure of management approach		Gov 13, Eco12	Promoting social responsibility in the value chain (29)	Supply Chain Introduction		
Environmental Grievance Mechanisms							
G4-DMA	Disclosure of management approach				Corporate Policies Anti-Corruption and Whistle-Blowing		

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Employment							
G4-DMA	Disclosure of management approach			Employment practices (19)	Staff Management Approach		
G4-LA1	New employee hires and employee turnover	6.4.3	Soc 4, Soc 13		Staff Introduction Social Performance	#	
Occupational Health And Safety							
G4-DMA	Disclosure of management approach		Gov 6, Gov 7, Gov 8, Gov 9, Soc 7		Safety Management Approach Staff and Contractor Safety		
G4-LA5	Workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	6.4.6			Staff Management Approach		Workers' health and safety is addressed through the formal consultation mechanism, including Joint Consultative Committees representing all staff.
G4-LA6	Injury, occupational diseases, lost days, and absenteeism, and work-related fatalities	6.4.6, 6.8.8	Soc 16, Soc 17	Employee and contractor health and safety (22)	Staff and Contractor Safety Performance Safety Targets and Performance	#	We disclose this indicator with breakdown by divisions rather than gender because this presentation is more relevant to understanding our businesses.
Training And Education							
G4-DMA	Disclosure of management approach			Employee development and training (23)	Staff Management Approach Recruitment in Hong Kong		
G4-LA9	Average hours of training	6.4.7	Soc 8		Training and Development Social Performance	#	
Diversity And Equal Opportunity							
G4-DMA	Disclosure of management approach			Diversity and equal opportunity (16)	Fair and Ethical Business Staff Management Approach		
G4-LA12	Composition of governance bodies and breakdown of employees	6.2.3, 6.3.7, 6.3.10, 6.4.3	Soc 13		Our People Corporate Governance Management Approach Social Performance		

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Supplier Assessment For Labour Practices							
G4-DMA	Disclosure of management approach		Gov 11, Gov 13, Eco 12	Promoting social responsibility in the value chain (29)	Supply Chain Introduction		
Labour Practices Grievance Mechanisms							
G4-DMA	Disclosure of management approach		Soc 3	Conditions of work & social protection (20)	Corporate Policies Anti-Corruption and Whistle-Blowing Staff Management Approach		
Investment							
G4-DMA	Disclosure of management approach			Supply chain human rights risk (28)	Supply Chain Introduction		
Non-Discrimination							
G4-DMA	Disclosure of management approach				Fair and Ethical Business Staff Management Approach		
Supplier Human Rights Assessment							
G4-DMA	Disclosure of management approach		Gov 11, Gov 13, Eco 12	Promoting social responsibility in the value chain (29)	Supply Chain Introduction		
Human Rights Grievance Mechanisms							
G4-DMA	Disclosure of management approach		Gov 11	Human rights grievances mechanism (15)	Anti-Corruption and Whistle-Blowing		
Local Communities							
G4-DMA	Disclosure of management approach		Soc 6		Community Introduction		
G4-S01	Local community engagement, impact assessments, and development programs	6.3.9, 6.5.1-6.5.2, 6.5.3, 6.8	Soc 15	Community involvement and development (31)	Community Engagement Community Railway Investing in Our Communities		

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Anti-Corruption							
G4-DMA	Disclosure of management approach		Gov 12		Corporate Policies Anti-Corruption and Whistle-Blowing		
G4-S05	Confirmed incidents of corruption and actions taken	6.6.1-6.6.2 6.6.3		Anti-corruption (3)	Anti-Corruption and Whistle-Blowing		
Public Policy							
G4-DMA	Disclosure of management approach				Value Chain Fair and Ethical Business New Railway Lines		
G4-S06	Total value of political contributions	6.6.1-6.6.2, 6.6.4		Responsible political involvement (4)	Please refer to comment.		As a matter of policy and as stated in the Company's Code of Conduct , we do not make political contributions in Hong Kong or any other location.
Anti-Competitive Behaviour							
G4-DMA	Disclosure of management approach				Corporate Policies Anti-Corruption and Whistle-Blowing		
G4-S07	Legal actions for ant-competitive behaviour, anti-trust, and monopoly practices	6.6.1-6.6.2, 6.6.5, 6.6.7		Fair competition (5)	Please refer to comment.		The Company was not involved in legal actions concerning anticompetitive behaviour, antitrust and monopoly practices during 2016.
Compliance - Society							
G4-DMA	Disclosure of management approach		Gov 11		Corporate Governance Management Approach Fair and Ethical Business		
G4-S08	Non-compliance with laws and regulations	4.6		Organizational Governance structure and process (1)	Social Performance		

2016	General Standard Disclosures	ISO26000	UITP	MTR Sustainability Reporting Issue (Issue #)	Website location	External Assurance	Notes, including reasons for omissions
Customer Health And Safety							
G4-DMA	Disclosure of management approach		Gov 8, Gov 9		Safety Management Approach Customer Safety Initiatives		
G4-PR1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	6.7.1-6.7.2, 6.7.4, 6.7.5, 6.8.8		Customer education (7) Customer health and safety (8)	Customer Safety Safety Targets and Performance		All service categories are under continuous assessment for improvement of health and safety.
Product Service And Labelling							
G4-DMA	Disclosure of management approach		Soc 3		Anti-Corruption and Whistle-Blowing Community Engagement Customers Management Approach		
G4-PR5	Results of surveys measuring customer satisfaction	6.7.1-6.7.2 6.7.6		Customer service, support and complaint handling (10)	Please refer to comment.		Customer satisfaction is measured through regular surveys and research and reflected in the Service Quality Index and Fare Index. Please refer to our Annual Report 2016
Customer Privacy							
G4-DMA	Disclosure of management approach		Gov 11	Customer data protection & privacy (11)	Please refer to comment.		Our privacy policy is available on our customer website.
Compliance - Product Responsibility							
G4-DMA	Disclosure of management approach		Gov 8		Customers Management Approach		
G4-PR9	Non-compliance with laws and regulations concerning the provision and use of products and services	4.6, 6.7.1-6.7.2, 6.7.6	Soc 3	Access to essential services, including avoidance of service disruption (12)	Train Service Performance		All service categories are under continuous assessment for improvement of health and safety.

#These KPIs have been assured by Deloitte.