



TKC METALS
Strength in vision

SURVIVING THE NEW NORMAL

2021 ANNUAL SUSTAINABILITY REPORT



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CONTEXTUAL INFORMATION



Company Details

Name of the Organization:	TKC Metals Corporation (TKC Metals)
Location of Headquarters:	Unit 201, 2 nd Floor W Tower Condominium 39 th Street Fort Bonifacio Global City, Taguig City, Philippines 1630
Location of Operations:	TKC Metals, through its subsidiaries, owns and operates steel manufacturing in these locations: <ul style="list-style-type: none">▪ Iligan City, Lanao del Norte, Philippines 9200▪ Zhangzhou Development Zone, Zhangzhou, Fujian Province, China 363105
Report Boundary: <i>Legal Entities (e.g. Subsidiaries) included in this Report</i>	This third annual sustainability performance report of the holding company, TKC Metals, specifically covers subsidiaries that own and operate steel manufacturing facilities for TKC Metals: <ul style="list-style-type: none">▪ Treasure Steelworks Corporation (TSC)▪ Zhangzhou Stronghold Steel Works Co. Ltd. (ZZS)
Business Model, including Primary Activities, Brands, Products, & Services:	TKC Metals is a publicly listed company in the Philippine Stock Exchange (PSE) as an operating and holding company primarily engaged in the manufacturing and distribution of various steel and metal products. Operationally, TKC Metals undertakes the exclusive marketing and sales of steel billets manufactured in the billet making facility owned and operated by TSC.  TSC owns and operates a billet making plant and blast furnace facility within a 20 – hectare complex located in Iligan City, Lanao del Norte, Philippines. The facility complex is previously owned by the former <i>National Steel Corporation</i> and is the largest billet making plant in the Philippines in terms of installed rated capacity. The facility has a production capacity of 300,000 metric tons per annum and is currently under shutdown operations. TKC Metals also has an effective controlling equity share in ZZS, an overseas steel pipe manufacturing company incorporated and based in Zhangzhou, Fujian Province, China.  ZZS is a majority –owned and controlled subsidiary of TKC Metals established in Zhangzhou, Fujian Province, China on 13 June 2005 with a registered capital of USD 40 Million. ZZS manufactures and distributes various steel pipe products in China and other export markets and is the first steel pipe producer in Fujian Province. ZZS manufactures Electric Resistance Welded (ERW) and spiral welded pipes for general construction and water transmission and, prospectively, seamless pipes for the oil & gas development industry. These steel pipes are used in oil, gas, and liquid transport, and in structural applications such as ports, shipyards, roads, and bridges. Currently, ZZS has an annual production of 40,000 metric tons of polyethylene (PE) – coated spiral welded and ERW pipes. ZZS is strategically located in <i>Zhangzhou Development Zone</i> , a special economic zone in Fujian Province, enjoying a logistical advantage and access to both domestic and export markets.
Reporting Period:	01 January 2021 – 31 December 2021
Highest Ranking Person Responsible for this Report:	Mr. Domingo S. Benitez Jr. <i>President & Chief Operating Officer (COO)</i>

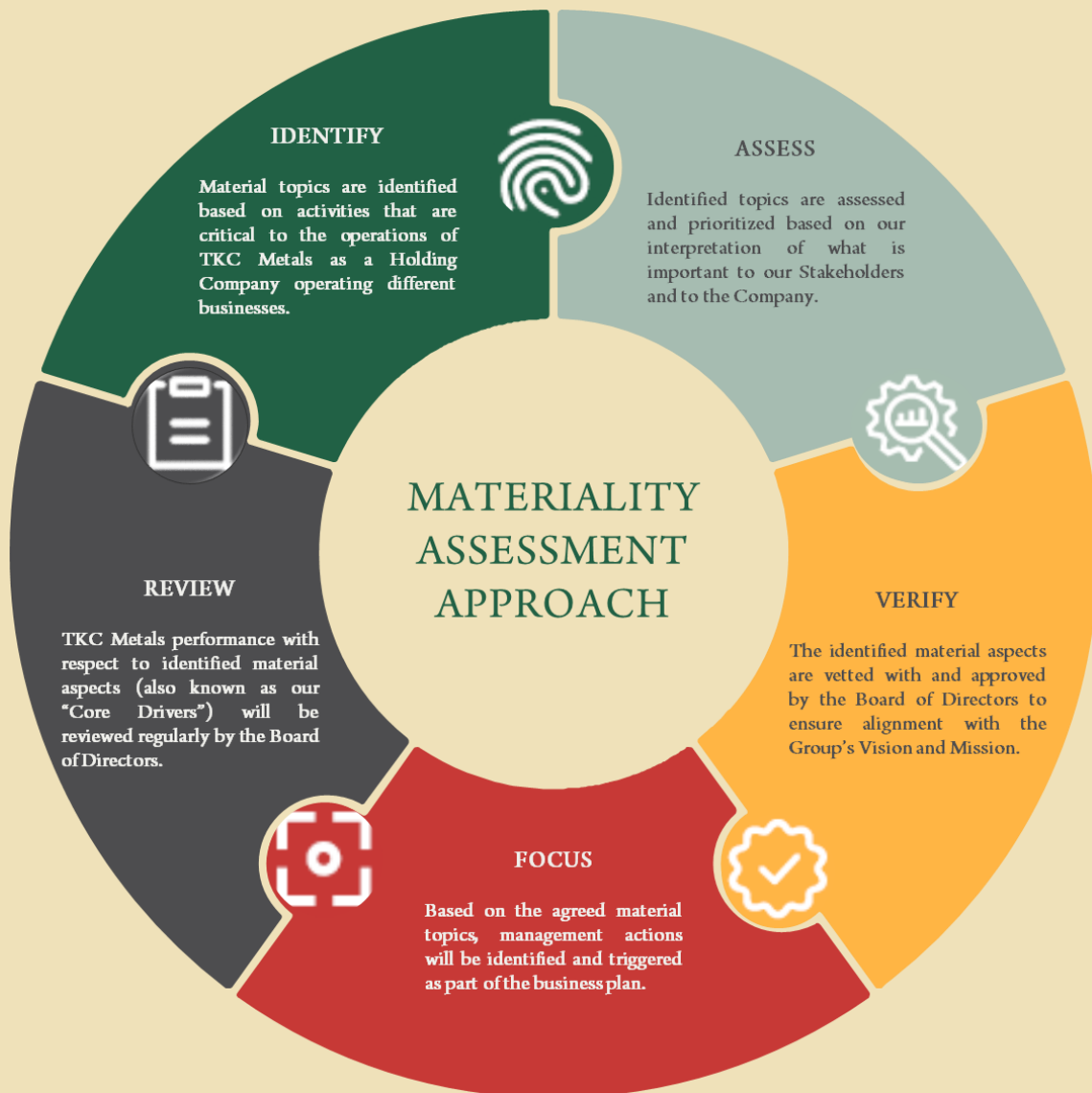
Materiality Process

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

**See Disclosure 3-1 (GRI 3: Material Topics 2021)*

TKC Metals prepared this annual sustainability performance report in compliance with the Philippine Securities & Exchange Commission (SEC) Memorandum Circular No. 4, Series of 2019 and made reference to the Global Reporting Initiative (GRI) Standards for the reporting period stated above.

TKC Metals has adapted the subsequent approach to assess its material topics:



TKC Metals has identified and prioritized the following *Core Drivers* for the Company and its Stakeholders as duly reflected in its Sustainability Framework based on the Materiality Assessment.



INVESTMENT MANAGEMENT

Direct Economic Value Generated (Revenue), Direct Economic Distributed



GOOD GOVERNANCE

Training on Anti – Corruption Policies & Procedures, Incidents of Corruption



RESPONSIBLE BUSINESS

Solid & Hazardous Wastes, Effluents, Environmental Compliance, Diversity, Equal Opportunity, & Anti - Discrimination



RISK MANAGEMENT

Occupational Health & Safety, Customer Privacy, Data Security



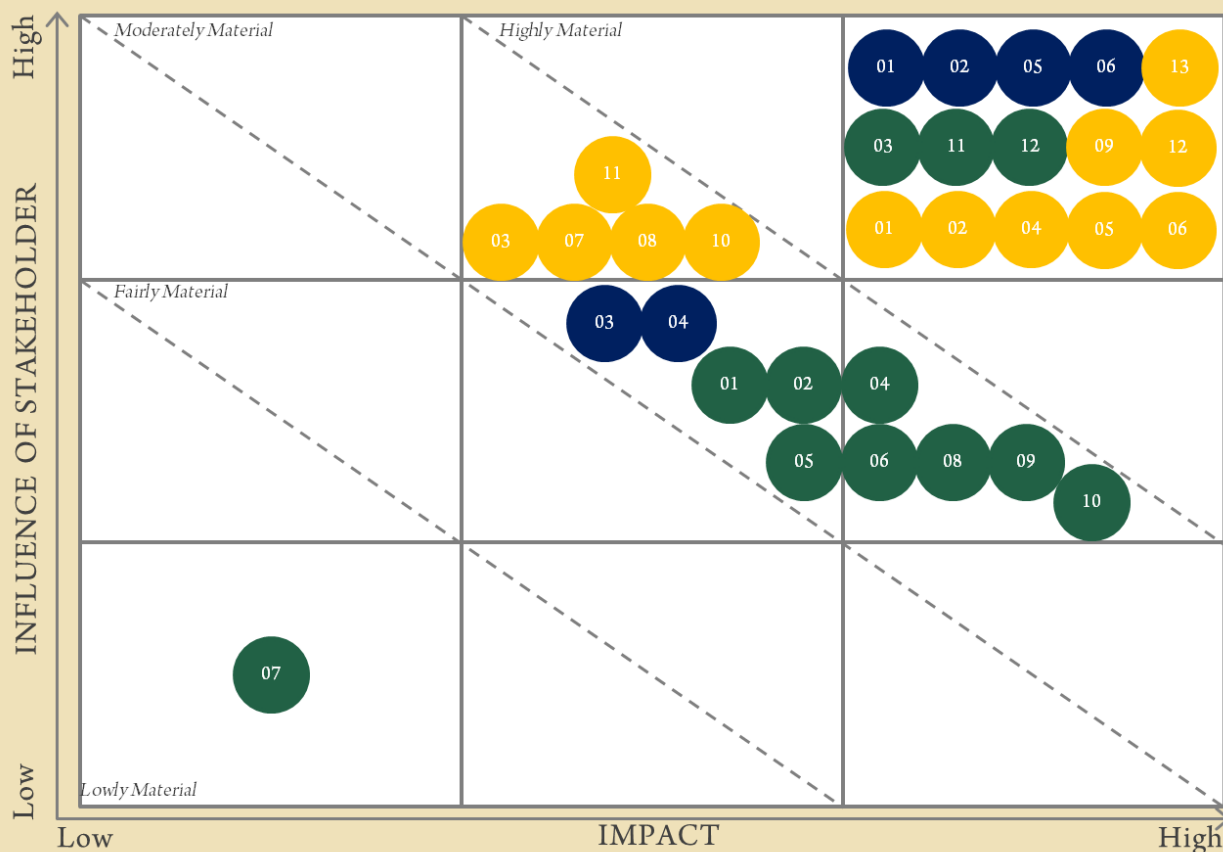
CUSTOMER EXPERIENCE

Customer Satisfaction



EMPLOYEE WELFARE

Employee Hiring & Benefits, Employee Training & Development, Labor Standards & Human Rights



ECONOMIC	ENVIRONMENT	SOCIAL
01 Direct Economic Value Generated	01 Energy	01 Employee Hiring & Benefits
02 Direct Economic Value Distributed	02 Water	02 Employee Training & Development
03 Climate – Related Risks & Opportunities	03 Effluents	03 Labor – Management Relations
04 Proportion of Spending on Local Suppliers	04 Materials	04 Diversity, Equal Opportunity, & Anti - Discrimination
05 Training on Anti – Corruption Policies & Procedures	05 Watersheds	05 Occupational Health & Safety
06 Incidents of Corruption	06 Marine	06 Labor Standards & Human Rights
	07 IUCN / KBA	07 Supply Chain Management
	08 Air Emission	08 Significant Impacts to Local Communities
	09 GHG	09 Customer Satisfaction
	10 NO _x , SO _x , PM	10 Health & Safety
	11 Solid & Hazardous Waste	11 Marketing & Labeling
	12 Environmental Compliance	12 Customer Privacy
		13 Data Security

Disclosures of TKC Metals are based on the assessed highly material topics in the uppermost quadrant of the matrix represented by the color – coded numbers described in the table.

Data for some disclosure topics in this annual sustainability performance report are from specific subsidiary(ies) of TKC Metals and not all Companies within the Group. This is reflective of its materiality and relevance to the operations of TKC Metals and the maturity of data collection systems that are currently in place as a reporter on sustainability performance. We have provided specific information on such disclosures in the coming sections of this report

ECONOMIC



Economic Performance

Economic Value Generated & Distributed

DISCLOSURE	UNIT	AMOUNT		
		2019	2020	2021
Direct Economic Value Generated (Revenue)	PHP	566,764,589.00	512,050,821.00	1,155,152,942.00
Direct Economic Value Distributed:				
a. Operating Costs	PHP	165,515,708.00	134,736,868.00	157,505,390.00
b. Employee Wages & Benefits	PHP	39,809,851.00	43,850,708.00	56,544,390.00
c. Payments to Suppliers, Other Operating Costs	PHP	44,536,367.00	25,521,155.00	
d. Dividends given to Stakeholders & Interest Payments to Loan Providers	PHP	68,461,849.00	55,402,784.00	55,566,736.00
e. Taxes given to Government	PHP	12,707,801.00	9,962,221.00	9,627,161.00
f. Investments to Community (e.g. Donations, CSR)	PHP	0.00	0.00	0.00

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?

WHICH STAKEHOLDERS ARE AFFECTED?

MANAGEMENT APPROACH

The impact of the economic performance happens at multiple levels including influence on shareholder value, amount of money spent to develop local businesses (Suppliers), amount of money spent to develop local community (CSR), and most importantly, the ability to support nation building through taxes, wherein TKC Metals has a direct involvement as it is primarily liable for its economic direction and the outcomes of its operations.

Affected Stakeholders are:

- Shareholders & Investors
- Employees
- Business Partners (Suppliers, Vendors, Contractors, etc.)
- Government Regulators
- Local Community

TKC Metals, under the strict stewardship and guidance of its Management, has consistently ensured and delivered a profitable performance for its key stakeholders through the implementation of a more proactive business methodologies, as well as pursuing a more competitive sales and marketing approach, thus, surviving the challenges of the new normal.

In addition, the Organization has proactively managed its production and operating cost to be maintained within the established budget, ensuring a cost – efficient production environment.

WHAT ARE THE RISKS IDENTIFIED?

WHICH STAKEHOLDERS ARE AFFECTED?

MANAGEMENT APPROACH

The unfavorable level of corporate performance coupled with a weak balance sheet position enhances the exposure of TKC Metals to market volatility, creating an unlikely negative impression in the business community, which may eventually lead into a thorough evaluation and assessment of the Organization's economic ability.

Affected Stakeholders are:

- Shareholders & Investors
- Employees
- Business Partners (Suppliers, Vendors, Contractors, etc.)
- Government Regulators
- Local Community

TKC Metals proactively and regularly review and update its operations and administrative controls and policies for implementation to ensure a stable cash flow management or outsource capital investment to infuse and start, revive, improve, and diversify the operations of its subsidiaries.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
TKC Metals has identified the opportunity to increase its production capacity, as well as the ability to implement a very competitive sales and marketing strategy through the hiring and retaining competent employees and generating the required capital infusion.	Affected Stakeholders are: <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	TKC Metals has proactively addressed its working capital requirements to ensure the successful achievement of its targeted level of operations through hiring of experts, competent professional employees, and consultant to fill in key positions. Furthermore, the Organization continuously conducts its proactive market research and evaluation in determining consumer preference, appetite, and demands, as well as in identifying current market trends to support the increase in the Organization's level of operations.

The policy of TKC Metals on **economic performance** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Anti – Corruption

Training on Anti – Corruption Policies & Procedures

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Percentage of Employees to whom the Organization's Anti – Corruption Policies & Procedures have been Communicated To	%	83.00	50.00	33.33
Percentage of Business Partners to whom the Organization's Anti – Corruption Policies & Procedures have been Communicated To	%	83.00	66.67	33.33
Percentage of Directors that have Received Anti – Corruption Training	%	2.00	47.33	0.00
Percentage of Employees that have Received Anti – Corruption Training	%	72.00	33.33	0.00

Incidents of Corruption

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Number of Incidents in which Directors were Removed or Disciplined for Corruption	#	0	0	0
Number of Incidents in which Employees were Dismissed or Disciplined for Corruption	#	2	3	0
Number of Incidents when Contracts with Business Partners were Terminated due to Incidents of Corruption	#	0	1	0

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>Corruption can occur across various functions in an Organization and has significant impact on the Company's reputation and competitiveness, detrimentally affects the Employee's morale, may adversely impact the Company's relationship with Business Partners (Suppliers, Vendors, Contractors, etc.), and may eventually diminish Shareholder value.</p>	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals strictly implements, monitors, and measures the level of compliance of the Organization's Board of Directors, Management Officers, and Employees on its existing policies, rules, and regulations on anti – corruption as embodied in TKC Metals 2017 Manual of Corporate Governance and in TKC Metals 2019 I – ACGR.</p>
<p>TKC Metals needs to be cognizant of the risk of ensuring the integrity and commitment of adherence to the existing anti – corruption policies, rules, regulations, and practices during the employment of TKC Metals Directors, Management Officers, and Employees and while working with Small and Medium Enterprises (SMEs) as Business Partners (Suppliers, Vendors, Contractors, etc.).</p>	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals clearly states in its 2017 Manual of Corporate Governance and in its 2019 I – ACGR the Organization's strategic direction towards the introduction of programs in safeguarding and protecting the interest, assets and properties of the Organization in order to achieve its established financial targets.</p>
<p>TKC Metals has identified the need to employ and retain competent employees, as well as to significantly increase training and awareness of TKC Metals Directors, Management Officers, Employees, and Business Partners (Suppliers, Vendors, Contractors, etc.) in the Organization's Anti – Corruption Policy, rules, regulations, and practices.</p>	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals continues to proactively ensures its compliance to the required Securities and Exchange Commission (SEC) and Philippine Stock Exchange (PSE) trainings for Directors and Key Management Officers and has planned to pursue a suitable risk and anti – corruption training programs for the Organization's Directors, Management Officers, and Employees.</p>

The policy of TKC Metals on **anti - corruption** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>

ENVIRONMENT



Water & Effluents

Effluents

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Total Volume of Water Discharged	Cubic Meters	11,395	0	1,800
Percent of Wastewater Recycled	%	0	0	0

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>Improperly managed effluents may affect TKC Metals at multiple levels including:</p> <ul style="list-style-type: none"> ▪ Potential loss in revenue due to imposition of monetary fines and non – monetary sanctions; ▪ Potential loss of reputation due to potential revocation of Environmental Compliance Certificate (ECC) and License to Operate (LTO); and ▪ Potential impacts to the health and safety of the Local Community where TKC Metals operates. 	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals continues to proactively ensure its continued compliance to all applicable local and international environmental laws, rules, and regulations, through the proactive implementation of an EMS, which is certified to be in accordance with the requirements of ISO 14001:2015 and the designation of a dedicated PCO, who monitors the water consumption and wastewater discharges of TKC Metals, as well as ensure the consistent implementation of good environmental practices for water and wastewater management, including the adaptation of the most feasible water conservation and wastewater reduction programs.</p> <p>TKC Metals further continues to employ third party environmental management consultant, who guides the Organization in managing its water consumption and wastewater discharges, as well as ensuring its continued environmental compliance.</p>

WHAT ARE THE RISKS IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>Scarcity of water supply in the Local Community resulting in limited access to clean and safe water.</p>	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals continues to proactively ensure its continued compliance to all applicable local and international environmental laws, rules, and regulations, through the proactive implementation of an EMS, which is certified to be in accordance with the requirements of ISO 14001:2015 and the designation of a dedicated PCO, who monitors the water consumption and wastewater discharges of TKC Metals, as well as ensure the consistent implementation of good environmental practices for water and wastewater management, including the adaptation of the most feasible water conservation and wastewater reduction programs.</p>

The dedicated PCO monitors the proper and effective implementation of feasible water conservation and wastewater reduction programs.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
Exploring opportunities to recycle generated wastewater.	Affected Stakeholders are: <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	Guided by its existing EMS and its firm commitment to minimize its environmental footprint, TKC Metals plans to undertake a comprehensive study to recycle its generated wastewater.

The policy of TKC Metals on **water & effluents** is embedded on TKC Metals 2017 **Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Solid & Hazardous Wastes

Solid Waste

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Total Solid Waste Generated	kg	11,395	27,760	102,073
Reusable	kg	0	0	4,873
Recyclable	kg	0	27,400	96,840
Composted	kg	0	0	0
Incinerated	kg	0	0	0
Residuals / Landfilled	kg	360	360	360

Hazardous Waste

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Total Weight of Hazardous Waste Generated	kg	0	0	103
Total Weight of Hazardous Waste Transported	kg	0	0	0

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>The generation of solid and hazardous wastes is inevitable in the operations of any Organization. The generated solid and hazardous wastes present potential impacts to human health and the immediate surroundings of the Community where TKC Metals operates, if improperly managed.</p>	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals continues to proactively ensure its continued compliance to all applicable local and international environmental laws, rules, and regulations, through the proactive implementation of an Environmental Management System (EMS), which is certified to be in accordance with the requirements of ISO 14001:2015 and the designation of a dedicated Pollution Control Officer (PCO), who fulfills the responsibility of managing the environmental compliance of TKC Metals, as well as ensuring the consistent implementation of good environmental practices for solid and hazardous wastes management, including planning, rolling, out, and implementation of feasible waste reduction programs.</p> <p>TKC Metals further continues to employ third party environmental management consultant, who guides the Organization in managing its generated solid and hazardous wastes, as well as ensuring its continued environmental compliance.</p>

WHAT ARE THE RISKS IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>The incidental exposure of the Local Community to improperly manage solid and hazardous wastes due to road traffic accident and accidental release or spill, which may adversely impact tourism opportunities and may result into long – term ill – health effects for exposed individuals that may eventually lead into limited access to decent life / livelihood.</p>	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals continues to proactively ensure its continued compliance to all applicable local and international environmental laws, rules, and regulations, through the proactive implementation of an EMS, which is certified to be in accordance with the requirements of ISO 14001:2015 and the designation of a dedicated PCO, who fulfills the responsibility of managing the environmental compliance of TKC Metals, as well as ensuring the consistent implementation of good environmental practices for solid and hazardous wastes management, including planning, rolling, out, and implementation of feasible waste reduction programs.</p> <p>The dedicated PCO proactively ensure the appropriate handling, transportation, treatment, and safe disposal of all generated solid and hazardous wastes.</p>

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
Exploring opportunities for the optimization of diverting wastes away from the landfill, which supports the goal of TKC Metals to minimize its environmental footprint.	Affected Stakeholders are: <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	Guided by its existing EMS and its firm commitment to minimize its environmental footprint, TKC Metals plans to develop and establish a Waste Data Collection System to properly implement the most suitable waste segregation scheme for the various waste streams of TKC Metals.

The policy of TKC Metals on **solid & hazardous wastes** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Environmental Compliance

Non – Compliance with Environmental Laws & Regulations

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Total Amount of Monetary Fines for Non – Compliance with Environmental Laws and / or Regulations	PHP	0.00	0.00	0.00
No. of Non – Monetary Sanctions for Non – Compliance with Environmental Laws and / or Regulations	#	0	0	0
No. of Cases Resolved through Dispute Resolution Mechanism	#	0	0	0

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION’S INVOLVEMENT IN THE IMPACT?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
Failure to comply with all applicable local and international environmental laws, rules, and regulations impacts the quality of life of the Local Community, as well as the reputation, brand image, and revenue performance of TKC Metals.	Affected Stakeholders are: <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	TKC Metals continues to proactively ensure its continued compliance to all applicable local and international environmental laws, rules, and regulations, through the proactive implementation of an EMS, which is certified to be in accordance with the requirements of ISO 14001:2015 and the designation of a dedicated PCO, who fulfills the responsibility of managing the environmental compliance of TKC Metals, as well as ensure the consistent implementation of good environmental practices. TKC Metals further continues to employ third party environmental management consultant, who guides the Organization in ensuring its continued environmental compliance.

WHAT ARE THE RISKS IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>The impacts of non – compliance to any applicable local and international environmental laws, rules, and regulations happens at multiple levels including:</p> <ul style="list-style-type: none"> ▪ Gradual degradation of the existing environment; ▪ Potential decline in the associated opportunities for tourism; ▪ Potential loss in revenue due to imposition of monetary fines and non – monetary sanctions; ▪ Potential loss of reputation due to potential revocation of ECC and LTO; and ▪ Potential impacts to the health and safety of the Local Community where TKC Metals operates. 	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>TKC Metals continues to proactively ensure its continued compliance to all applicable local and international environmental laws, rules, and regulations, through the proactive implementation of an EMS, which is certified to be in accordance with the requirements of ISO 14001:2015 and the designation of a dedicated PCO, who fulfills the responsibility of managing the environmental compliance of TKC Metals, as well as ensure the consistent implementation of good environmental practices.</p> <p>TKC Metals further continues to employ third party environmental management consultant, who guides the Organization in ensuring its continued environmental compliance.</p>

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>Exploring opportunities to significantly minimize the identified significant environmental aspects and risks, as well as empower Employees environmental training and awareness programs.</p>	<p>Affected Stakeholders are:</p> <ul style="list-style-type: none"> ▪ Shareholders & Investors ▪ Employees ▪ Business Partners (Suppliers, Vendors, Contractors, etc.) ▪ Government Regulators ▪ Local Community 	<p>Guided by its existing EMS and its commitment to minimize its environmental footprint, TKC Metals continues to pursue its plan to adapt, roll out, and implement feasible risk reduction strategies and programs aimed to significantly reduce the potential impacts of the identified significant environmental aspects and risks.</p> <p>TKC Metals also proactively continue to pursue its plan to adapt the most feasible environmental training and awareness programs for its Employees and Business Partners (Suppliers, Vendors, Contractors, etc.), which was disrupted by the prevailing COVID-19 pandemic.</p> <p>TKC Metals further continues to employ third party environmental management consultant, who guides the Organization in ensuring its continued environmental compliance.</p>

The policy of TKC Metals on **environmental compliance** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

SOCIAL



Employee Management

Employee Hiring & Benefits

Employee Data

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Total Number of Employees ¹				
a. Number of Female Employees	#	22	29	29
b. Number of Male Employees	#	66	61	63
Attrition Rate ²	rate	10.5	15.8	23.3
Ratio of Lowest Paid Employee Against Minimum Wage	ratio	1:1.59	1:1.59	1:1.59

¹Employees are individuals who are in an employment relationship with the Organization, according to national law or its application (GRI Standards 2016 Glossary)

²Attrition Rate = $\frac{\text{Total no. of New Hires} - \text{Total No. of Turnovers}}{\text{Total No. of Employees of Previous Year} + \text{Total Number of Employees of Current Year}}$

³Ratio = Minimum Wage : Lowest Paid Employee

Employee Benefits

DISCLOSURE	Y / N			% EMPLOYEES WHO AVAILED					
				FEMALE			MALE		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
SSS	Y	Y	Y	95.45	31.82	33.33	90.91	12.12	33.33
PhilHealth	Y	Y	Y	90.91	31.82	33.33	87.88	12.12	33.33
PAG - IBIG	Y	Y	Y	95.45	31.82	33.33	90.91	12.12	33.33
Parental Leaves	Y	Y	Y	0.00	0.00	0.00	0.00	0.00	0.00
Vacation Leaves	Y	Y	Y	95.45	90.91	66.67	92.48	87.88	66.67
Sick Leaves	Y	Y	Y	63.68	68.22	33.38	80.38	87.89	33.38
Medical Benefits (Aside from PhilHealth)	Y	Y	Y	0.00	59.09	33.33	0.00	75.76	33.33
Housing Assistance (Aside from PAG - IBIG)	Y	Y	Y	14.70	0.00	0.00	22.73	0.00	0.00
Retirement Fund (Aside from SSS)	Y	Y	Y	0.00	0.00	0.00	0.02	0.02	0.07
Further Education Support	Y	N	N	0.00	0.00	0.00	0.00	0.00	0.00
Company Stock Options	N	N	N	0.00	0.00	0.00	0.00	0.00	0.00
Telecommuting	Y	Y	Y	4.55	4.55	33.33	4.61	6.06	16.67
Flexible Work Arrangement (FWA)	Y	Y	Y	9.09	9.09	33.33	12.15	12.15	33.40

**WHAT IS THE IMPACT & WHERE DOES IT OCCUR?
WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE
IMPACT?**

MANAGEMENT APPROACH

Non – competitive employment benefits will eventually result in limiting the ability of TKC Metals to hire and retain the best talents and may lead to attrition and Employees of TKC Metals seeking employment elsewhere.

The sustained compliance of TKC Metals with the requirements of all relevant and existing labor laws, rules, and regulations of the Department of Labor and Employment (DOLE) and all other appropriate government entities is attributed to the commitment of TKC Metals to establish, implement, and maintain relevant company policies that manage, protect, and care for the welfare and benefits of the Employees, ensuring their continuous engagement, retention, and best performance.

WHAT ARE THE RISKS IDENTIFIED?

MANAGEMENT APPROACH

The overall competitiveness of TKC Metals is affected by multiple factors including:

- Employees dissatisfaction, which may result to shortage on critical skills, as well as difficulty in looking for qualified replacements;
- Attrition / loss of Employees to completion, which may result in an increase number of exiting Employees; and
- Possible retirement.

TKC Metals continues to pursue the enhancement of its corporate image and branding through the proactive identification and implementation of the most feasible above industry – standard benefit packages and work set up to attract and retain qualified talents and Employees.

TKC Metals further pursue the proactive provision of the most suitable training and development programs for its Employees.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

MANAGEMENT APPROACH

With the increased reliance on technology and the reality of an economic uncertainty amidst the prevailing COVID-19 pandemic, TKC Metals has identified the opportunity to exploit the growing acceptance of work from home set up coupled with the current surge of potential talents searching employment opportunities, as well as to benchmark with relevant industry performers to identify means of further enhancing the brand image of TKC Metals as the Organization of choice for prospective talents possessing the desired qualifications of TKC Metals.

TKC Metals continues to pursue the enhancement of its corporate image and branding through the proactive identification and implementation of the most feasible above industry – standard benefit packages and work set up to attract and retain qualified talents and Employees.

The policy of TKC Metals on **employee hiring & benefits** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Employee Training & Development

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Total Training Hours Provided to Employees				
a. Female Employees	hours	150	150	150
b. Male Employees	hours	150	166	150

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Average Training Hours Provided to Employees				
a. Female Employees	hours/employee	6.82	5.17	7.50
b. Male Employees	hours/employee	2.27	2.27	3.19

**WHAT IS THE IMPACT & WHERE DOES IT OCCUR?
WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?**

The impact of appropriately trained Employees happens at multiple levels, including influence on the ability of TKC Metals to operate at the highest business ethical standards, Customer satisfaction, career advancement of the respective Employee, and promoting safe and healthy workplace.

MANAGEMENT APPROACH

The provision for Employee learning and development opportunities amidst the prevailing COVID-19 pandemic has been a challenge for every Organization. As such, TKC Metals adapts the most suitable and most effective training programs and strategies, including the continuous utilization of online learning platforms and continues to proactively analyze the training needs of the Organization and identify specific skill gaps.

In addition, the Management of TKC Metals annually allocates and approved sufficient resources for Employee learning and development.

WHAT ARE THE RISKS IDENTIFIED?

The lack of commitment from Employees to proactively participate in the provided training and the drive to enforce the training and ensure its effectiveness.

MANAGEMENT APPROACH

TKC Metals adapts the most suitable and most effective training programs and strategies, including the continuous utilization of online learning platforms and continues to proactively analyze the training needs of the Organization and identify specific skill gaps.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

With the increased reliance on technology and the reality of an economic uncertainty amidst the prevailing COVID-19 pandemic, TKC Metals has identified the opportunity to exploit the growing demand for online training coupled with an increase on self – development.

MANAGEMENT APPROACH

TKC Metals adapts the most suitable and most effective training programs and strategies, including the continuous utilization of online learning platforms and continues to proactively analyze the training needs of the Organization and identify specific skill gaps.

The policy of TKC Metals on **employee training & development** is embedded on TKC Metals 2017 **Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Diversity & Equal Opportunity

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
% of Female Workers in the Workforce	%	25.00	32.22	31.52
% of Male Workers in the Workforce	%	75.00	67.78	68.48
Number of Employees from Indigenous Communities and / or Vulnerable Sector ¹	#	0	42	3

¹Vulnerable Sector includes Elderly, Persons with Disability (PWDs), Vulnerable Women, Refugees, Migrants, Internally Displaced Persons (IDPs), People Living with HIV & Other Diseases, Solo Parents, and the Poor or Base of the Pyramid (BOP: Class D & E)

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?

Diversity and equal employment enhances the ability of TKC Metals to attract and retain preferred talents, as well as its reputation as an equal opportunity employer. These practices help bolster the status of TKC Metals as an employer of choice for top talent.

MANAGEMENT APPROACH

TKC Metals continues to proactively pursue the adaption of a systematic approach to continuously promote and cultivate diversity and equal opportunity within TKC Metals employment lifecycle (talent acquisition, learning and development), which was disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE RISKS IDENTIFIED?

Incidents of discrimination and harassment may lead to the voluntary separation of employees and will reflect negatively on the reputation and brand image of TKC Metals. These incidents will negatively impact the ability of TKC Metals to attract and retain top talents.

MANAGEMENT APPROACH

TKC Metals continues to proactively pursue the adaption of a systematic approach to continuously promote and cultivate diversity and equal opportunity within TKC Metals employment lifecycle (talent acquisition, learning and development), which was disrupted by the prevailing COVID-19 pandemic.

TKC Metals further continues to pursue the adaption of an industry – standard recognized system for reporting, identifying, investigating, monitoring, and resolving any incidents of discrimination and harassment, which was also disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

Exploring opportunities to promote a culture of diversity.

MANAGEMENT APPROACH

TKC Metals continues to proactively pursue the adaption of a systematic approach to continuously promote and cultivate diversity and equal opportunity within TKC Metals employment lifecycle (talent acquisition, learning and development), which was disrupted by the prevailing COVID-19 pandemic.

The policy of TKC Metals on **diversity & equal opportunity** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Workplace Conditions, Labor Standards, & Human Rights

Occupational Health & Safety

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
Safe Man - Hours	man - hours	32	32	56,000
No. of Work – Related Injuries	#	7	2	1
No. of Work – Related Fatalities	#	0	0	0
No. of Work – Related Ill – Health	#	0	0	0
No. of Safety Drills	#	4	4	2

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?

The impact of Occupational Health and Safety (OHS) performance influences Employee morale, impacts operational costs, and affects the quality of service that TKC Metals provides.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure its continued compliance to OHS requirements based on all applicable local and international laws, rules, and regulations through the proactive implementation of an OHS Management System, which is certified to be in accordance with the requirements of ISO 45001:2018 and the proactive identification and control of health and safety hazards in the workplace, including maintaining a labor – oriented work environment.

WHAT ARE THE RISKS IDENTIFIED?

Fatality, serious injury, and / or damage to property will likely lead to increased operational costs, negatively affect relationships with the Local Community, have an adverse impact on the confidence of Shareholders and Investors, and significantly damage the brand image and reputation of TKC Metals.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure its continued compliance to OHS requirements based on all applicable local and international laws, rules, and regulations through the proactive implementation of an OHS Management System, which is certified to be in accordance with the requirements of ISO 45001:2018 and the proactive identification and control of health and safety hazards in the workplace, including maintaining a labor – oriented work environment.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

Boosting Employee morale through allocating sufficient resources to promote and provide a healthy and safe workplace.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure its continued compliance to OHS requirements based on all applicable local and international laws, rules, and regulations through the proactive implementation of an OHS Management System, which is certified to be in accordance with the requirements of ISO 45001:2018 and the proactive identification and control of health and safety hazards in the workplace, including maintaining a labor – oriented work environment.

The policy of TKC Metals on **occupational health & safety** is embedded on TKC Metals 2017 **Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Labor Laws & Human Rights

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
No. of Legal Actions or Employees Grievance Involving Forced or Child Labor	#	0	0	0

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

TOPIC	Y / N			IF YES, CITE REFERENCE IN COMPANY POLICY		
	2019	2020	2021	2019	2020	2021
Forced Labor	N	N	Y	Not Applicable	Not Applicable	Staff Manual
Child Labor	N	N	Y	Not Applicable	Not Applicable	Staff Manual
Human Rights	N	N	Y	Not Applicable	Not Applicable	Staff Manual

WHAT IS THE IMPACT & WHERE DOES IT OCCUR?
WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?

Non – compliance to any relevant and existing local and international labor and social laws, rules, and regulations have a negative influence on the reputation of TKC Metals as an employer of choice and its ability to attract and retain top talents.

MANAGEMENT APPROACH

The sustained compliance of TKC Metals with the requirements of all relevant and existing labor and social laws, rules, and regulations of the Department of Labor and Employment (DOLE) and all other appropriate government entities is attributed to the commitment of TKC Metals to establish, implement, and maintain relevant company policies that manage, protect, and care for the welfare of the Employees against unfair labor practices such as child labor, forced labor, and human rights violations.

TKC Metals further continues to pursue the adaption of an industry – standard recognized system for reporting, identifying, investigating, monitoring, and resolving any incidents of non – compliance to any relevant and existing local and international labor and social laws, rules, and regulations, which was disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE RISKS IDENTIFIED?

Failure to comply with the relevant and existing local and international labor and social laws, rules, and regulations have a negative influence on the reputation and brand image of TKC Metals and its ability to attract and retain top talents. Failure to comply may

MANAGEMENT APPROACH

The sustained compliance of TKC Metals with the requirements of all relevant and existing labor and social laws, rules, and regulations of the Department of Labor and Employment (DOLE) and all other appropriate government entities is attributed to the commitment of

likewise lead into scrutiny from DOLE and other relevant government entities.

TKC Metals to establish, implement, and maintain relevant company policies that manage, protect, and care for the welfare of the Employees against unfair labor practices such as child labor, forced labor, and human rights violations.

TKC Metals further continues to pursue the adaption of an industry – standard recognized system for reporting, identifying, investigating, monitoring, and resolving any incidents of non – compliance to any relevant and existing local and international labor and social laws, rules, and regulations, which was disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

MANAGEMENT APPROACH

Benchmarking with other relevant Organizations to ensure the implementation of the relevant industry’s good labor practices.

The sustained compliance of TKC Metals with the requirements of all relevant and existing labor and social laws, rules, and regulations of the Department of Labor and Employment (DOLE) and all other appropriate government entities is attributed to the commitment of TKC Metals to establish, implement, and maintain relevant company policies that manage, protect, and care for the welfare of the Employees against unfair labor practices such as child labor, forced labor, and human rights violations.

The policy of TKC Metals on **labor laws & human rights** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Customer Management

Customer Satisfaction

DISCLOSURE	SCORE			DID A THIRD PARTY CONDUCT THE CUSTOMER SATISFACTION STUDY (Y / N)?		
	2019	2020	2021	2019	2020	2021
Customer Satisfaction	83	0	0	N	N	N

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?

The overall performance of TKC Metals is affected by the satisfaction of its Customer. Customers experiencing inconvenience may become physically or verbally abusive that affects the servicing Employee(s) and exposed them to physical, mental, and / or emotional stress.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure the continued satisfaction of its Customers through the adaption of a Customer mindset framework that identifies and addresses Customers' needs and expectations, as well as the strict observation, adherence, and implementation of all existing Company policies, rules, and regulations regarding Customer satisfaction.

TKC Metals, under the stewardship of its Management, proactively allocate and approve sufficient resources for customer management and further continues to pursue the adaption of an industry – standard recognized system for reporting, identifying, investigating, monitoring, and resolving Customer concerns, which was disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE RISKS IDENTIFIED?

Dissatisfied Customers due to changes in the needs and expectations of the Customers affects the overall business reputation of TKC Metals.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure the continued satisfaction of its Customers through the adaption of a Customer mindset framework that identifies and addresses Customers' needs and expectations, as well as the strict observation, adherence, and implementation of all existing Company policies, rules, and regulations regarding Customer satisfaction.

TKC Metals, under the stewardship of its Management, proactively allocate and approve sufficient resources for customer management and further continues to pursue the adaption of an industry – standard recognized system for reporting, identifying, investigating, monitoring, and resolving Customer concerns, which was disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

Appropriately informed and well – motivated Employees are a testimony to the fact that TKC Metals is operating at the highest standard of business ethics.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure the continued satisfaction of its Customers through the adaption of a Customer mindset framework that identifies and addresses Customers' needs and expectations, as well as the strict observation, adherence, and implementation of all existing Company policies, rules, and regulations regarding Customer satisfaction.

TKC Metals, under the stewardship of its Management, proactively

allocate and approve sufficient resources for customer management and further continues to pursue the adaption of an industry – standard recognized system for reporting, identifying, investigating, monitoring, and resolving Customer concerns, which was disrupted by the prevailing COVID-19 pandemic.

The policy of TKC Metals on **customer satisfaction** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Customer Privacy

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
No. of Substantiated Complaints ¹ on Customer Privacy	#	0	0	0
No. of Complaints Addressed	#	0	0	0
No. of Customers, Users, and Account Holders whose Information is Used for Secondary Purposes	#	0	0	0

¹Substantiated 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 & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION’S INVOLVEMENT IN THE IMPACT?

TKC Metals values the privacy of its Customers and take it seriously to immediately address incident(s) of breach(es) to Customer privacy as it affects the confidence of both Local and Business Community.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure its continued compliance to all applicable and existing local and international Customer and data privacy and security laws, rules, and regulations through the adaption of the most suitable and most effective industry – standard Customer and data privacy and security policies and practices.

TKC Metals, under the stewardship of its Management, proactively allocate and approved sufficient resources for the effective implementation of Customer and data privacy and security policies and practices and further continues to pursue the adaption of an industry – standard recognized system for Customer and data privacy and security audit, as well as the most suitable and most effective Customer and data privacy and security training programs. These plans were disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE RISKS IDENTIFIED?

Any breach to Customer privacy negatively influence the reputation and brand image of TKC Metals that may lead to the loss of trust and confidence of Shareholders and Investors, Employees, Customers, Business Partners (Suppliers, Vendors, Contractors, etc.), Government Regulators, and Local Community.

MANAGEMENT APPROACH

TKC Metals continues to proactively ensure its continued compliance to all applicable and existing local and international Customer and data privacy and security laws, rules, and regulations through the adaption of the most suitable and most effective industry – standard Customer and data privacy and security policies and practices.

TKC Metals, under the stewardship of its Management, proactively allocate and approved sufficient resources for the effective implementation of Customer and data privacy and security policies and practices and further continues to pursue the adaption of an industry – standard recognized system for Customer and data privacy and security audit, as well as the most suitable and most effective Customer and data privacy and security training programs. These plans were disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

MANAGEMENT APPROACH

Appropriately informed and well – motivated Employees are a testimony to the fact that TKC Metals is operating at the highest standard of business ethics.

TKC Metals continues to proactively ensure its continued compliance to all applicable and existing local and international Customer and data privacy and security laws, rules, and regulations through the adaption of the most suitable and most effective industry – standard Customer and data privacy and security policies and practices.

TKC Metals, under the stewardship of its Management, proactively allocate and approved sufficient resources for the effective implementation of Customer and data privacy and security policies and practices and further continues to pursue the adaption of an industry – standard recognized system for Customer and data privacy and security audit, as well as the most suitable and most effective Customer and data privacy and security training programs. These plans were disrupted by the prevailing COVID-19 pandemic.

The policy of TKC Metals on **customer privacy** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

Data Security

DISCLOSURE	UNIT	QUANTITY		
		2019	2020	2021
No. of Data Breaches, including Leaks, Thefts, and Losses of Data	#	0	0	0

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?	MANAGEMENT APPROACH
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TKC Metals values the privacy and security of its data and take it seriously to immediately address incident(s) of breach(es) as it affects the confidence of both Local and Business Community.

TKC Metals continues to proactively ensure its continued compliance to all applicable and existing local and international Customer and data privacy and security laws, rules, and regulations through the adaption of the most suitable and most effective industry – standard Customer and data privacy and security policies and practices.

TKC Metals, under the stewardship of its Management, proactively allocate and approved sufficient resources for the effective implementation of Customer and data privacy and security policies and practices and further continues to pursue the adaption of an industry – standard recognized system for Customer and data privacy and security audit, as well as the most suitable and most effective Customer and data privacy and security training programs. These plans were disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE RISKS IDENTIFIED?	MANAGEMENT APPROACH
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Any breach to data security negatively influence the reputation and brand image of TKC Metals that may lead to the loss of trust and confidence of Shareholders and Investors, Employees, Customers, Business Partners (Suppliers, Vendors, Contractors, etc.), Government Regulators, and Local Community.

TKC Metals continues to proactively ensure its continued compliance to all applicable and existing local and international Customer and data privacy and security laws, rules, and regulations through the adaption of the most suitable and most effective industry – standard Customer and data privacy and security policies and practices.

TKC Metals, under the stewardship of its Management, proactively allocate and approved sufficient resources for the effective implementation of Customer and data privacy and security policies and practices and further continues to pursue the adaption of an industry – standard recognized system for Customer and data privacy and security audit, as well as the most suitable and most effective Customer and data privacy and security training programs. These plans were disrupted by the prevailing COVID-19 pandemic.

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	MANAGEMENT APPROACH
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Appropriately informed and well – motivated Employees are a testimony to the fact that TKC Metals is operating at the highest standard of business ethics.

TKC Metals continues to proactively ensure its continued compliance to all applicable and existing local and international Customer and data privacy and security laws, rules, and regulations through the adaption of the most suitable and most effective industry – standard Customer and data privacy and security policies and practices.

TKC Metals, under the stewardship of its Management, proactively allocate and approved sufficient resources for the effective implementation of Customer and data privacy and security policies

and practices and further continues to pursue the adaption of an industry – standard recognized system for Customer and data privacy and security audit, as well as the most suitable and most effective Customer and data privacy and security training programs. These plans were disrupted by the prevailing COVID-19 pandemic.

The policy of TKC Metals on **data security** is embedded on TKC Metals **2017 Manual on Corporate Governance** <https://tkcmetals.com.ph/sites/default/files/field/pdfpreview/2017tkcmanualofcorporategovernance.pdf>.

