

# Gearing Towards Resiliency



## 2023 Annual Sustainability Report



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## Statement of Use

TKC Metals Corporation (TKC Metals) has reported the information cited in this GRI Content Index for the period 01 January 2023 – 31 December 2023 with reference to the GRI Standards

## GRI 1 Used

GRI 1: Foundation 2021

 Standards	Disclosure	Location
GRI 2: General Disclosure 2021	2 – 1: Organizational Details	The Reporting Organization, page 5
GRI 2: General Disclosure 2021	2 – 2: entities, included in the Organization's Sustainability Reporting	The Reporting Organization, page 5
GRI 2: General Disclosure 2021	2 – 3: Reporting Period, Frequency, and Contact Point	The Reporting Organization, page 6
GRI 2: General Disclosure 2021	2 – 4: Restatements of Information	The Reporting Organization, page 6
GRI 3: Material Topics 2021	3 – 1: Process to Determine Material Topics	Materiality Process, page 6
GRI 3: Material Topics 2021	3 – 2: List of Material Topics	Materiality Process, page 7
GRI 201: Economic Performance 2016	201 – 1: Direct Economic Value Generated & Distributed	Economic Value Generated & Distributed, page 8
GRI 205: Anti – Corruption 2016	205 – 2: Communication & Training About Anti – Corruption Policies & Procedures	Training on Anti – Corruption Policies & Procedures, page 9
GRI 205: Anti – Corruption 2016	205 – 3: Confirmed Incidents of Corruption & Actions Taken	Incidents of Corruption, page 10
GRI 306: Waste 2020	306 – 3: Waste Generated	Solid & Hazardous Wastes, pages 13 - 14
GRI 306: Waste 2020	306 – 4: Waste Diverted from Disposal	Solid Waste, page 13
GRI 306: Waste 2020	306 – 5: Waste Directed to Disposal	Solid & Hazardous Wastes, pages 13 - 14
GRI 401: Employment 2016	401 – 1: New Employee Hires & Employee Turnover	Employee Hiring & Benefits, page 18
GRI 401: Employment 2016	401 – 2: Benefits Provided to Full – Time Employees that are Not Provided to Temporary or Part – Time Employees	Employee Hiring & Benefits, pages 18 - 19





GRI Standards	Disclosure	Location
GRI 401: Employment 2016	401 - 3: Parental Leave	Employee Hiring & Benefits, pages 18 - 19
GRI 404: Training & Education 2016	404 - 1: Average Hours of Training per Year per Employee	Employee Training & Development, page 20
GRI 405: Diversity & Equal Opportunity 2016	405 - 1: Diversity of Governance Bodies & Employees	Diversity & Equal Opportunity, page 22
GRI 403: Occupational Health & Safety 2018	403 - 9: Work - Related Injuries	Occupational Health & Safety, page 23
GRI 403: Occupational Health & Safety 2018	403 - 10: Work - Related Ill - Health	Occupational Health & Safety, page 23
GRI 418: Customer Privacy 2016	418 - 1: Substantiated Complaints Concerning Breaches of Customer Privacy & Losses of Customer Data	Customer Privacy, page 27

# Content Index

# Contextual Information

## Context of the Report

This 2023 Annual Sustainability Performance Report of TKC Metals Corporation (TKC Metals) has been prepared in accordance with the Notice to Publicly – Listed Companies (PLCs) regarding the implementation of the Revised Sustainability Reporting Guidelines and Sustainability Report (SuRe) Form issued by the Corporate Governance and Finance Department (CGFD) of the Philippines Security and Exchange Commission (SEC), maintaining the compliance of TKC Metals with the provisions of SEC Memorandum Circular No. 4, Series of 2019.

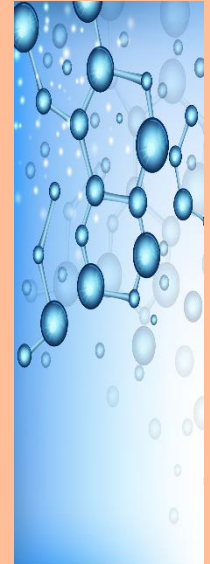
Following a key decision of TKC Metals Board of Directors for the planned disposal of Treasure Steelworks Corporation (TSC), TKC Metals continues to optimize its operations as TSC remained to be in ceased operations within the 2023 reporting period, commencing 01 January 2023 and ending on 31 December 2023, covering TKC Metals as the holding company and TSC as the subsidiary.

Disclosures of TKC Metals in this report made reference to the 2021 Global Reporting Initiative (GRI) Standards and are based in the assessed highly material topics. Data of some disclosure topics are from TSC. This is reflective of TKC Metals materiality and its relevance to the operations of TKC Metals, as well as the maturity of data collection systems that are currently in place as a reporter on sustainability performance. Specific information on such disclosures is provided in the coming sections of this report.

## The Reporting Organization

<b>Name of the Organization:</b>	<b>TKC Metals Corporation (TKC Metals)</b>
<b>Location of Headquarters:</b>	Unit 201, 2 <sup>nd</sup> Floor W Tower Condominium 39 <sup>th</sup> Street, Fort Bonifacio Global City, Taguig City, Philippines 1630
<b>Location of Operations:</b>	<b>TKC Metals</b> , through its subsidiary, <b>Treasure Steelworks Corporation (TSC)</b> , owns and operates a steel manufacturing facility situated in Iligan City, Lanao del Norte, Philippines 9200
<b>Reporting Boundary:</b> <i>Legal Entities (e.g. Subsidiaries) Included in this Report</i>	This 2023 Annual Sustainability Report covers <b>TKC Metals</b> as a holding company and specifically includes and covers <b>TSC</b> for the entire reporting period





**Business Model, Including Primary Activities, Brands, Products, & Services:**



TKC Metals is a publicly - listed company (PLC) in the Philippines Stock Exchange (PSE) as an operating and holding company primarily engaged in the business of manufacturing and distributing various steel and metal products. TKC Metals operationally undertakes the exclusive marketing and sales of steel billets manufactured in the billet making facility owned and operated by TSC.



TSC owns and operate a billet making plant and a blast furnace facility in a facility complex situated in Iligan City, Lanao del Norte, Philippines. The facility complex was previously owned by the former National Steel Corporation and is the largest billet making plant in the Philippines in terms of installed rated capacity. TSC billet making plant has an annual production capacity of 300,000 metric tons per annum and has remained under a ceased operations status quo since 2013.

<b>Reporting Period:</b>	01 January 2023 – 31 December 2023
<b>Highest Ranking Person Responsible for this Report:</b>	Mr. Efren A. Realeza CFO

**Materiality Process**

TKC Metals adapted the subsequent approach in determining and assessing its material topics:

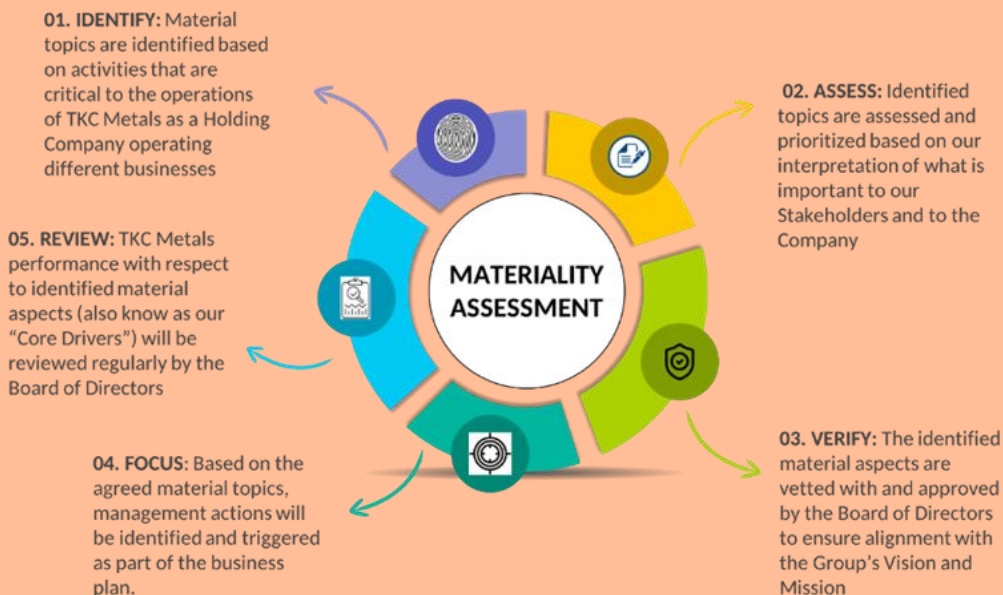


Figure 1 TKC Metals Materiality Assessment Approach

Contextual Information



# Contextual Information

TKC Metals has identified and assessed the following highly material topics:

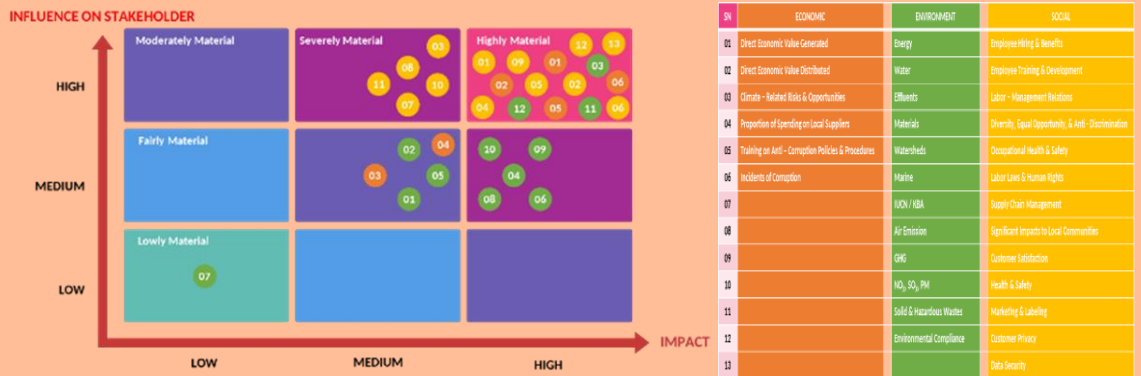
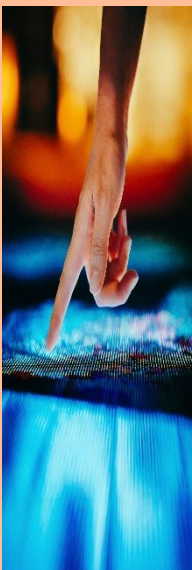


Figure 2 TKC Metals Materiality Matrix

These identified and assessed highly material topics are prioritized and became the Core Drivers of our Sustainability Framework.



Figure 3 TKC Metals Sustainability Framework





# Economic

## Economic Performance

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/2017tkcmanualforcorporategovernance.pdf>.

### Economic Value Generated & Distributed

DISCLOSURE	UNIT	AMOUNT				
		2019	2020	2021	2022	2023
<b>Direct economic Value Generated (Revenue)</b>	PHP	566,764,589.00	512,050,821.00	1,155,152,942.00	203,575,434.00	0.00
<b>Direct Economic Value Distributed:</b>						
a. Operating Cost	PHP	165,515,708.00	134,736,868.00	157,505,390.00	137,659,035.00	40,575,519.00
b. Employee Wages & Benefits	PHP	39,809,851.00	43,850,708.00	56,544,390.00	43,465,343.00	13,457,528.00
c. Payments to Suppliers, Other Operating Costs	PHP	44,536,367.00	25,521,155.00	35,766,865.00	44,105,194.00	16,296,852.00
d. Dividends Given to Stakeholders & Interest Payments to Loan Providers	PHP	68,461,849.00	55,402,784.00	55,566,736.00	42,130,500.00	26,487,131.00
e. Taxes Given to Government	PHP	12,707,801.00	9,962,221.00	9,627,161.00	7,958,007.00	16,813,132.00
f. Investment to Community (e.g. Donations, CSR)	PHP	0.00	0.00	0.00	0.00	0.00

#### WHAT IS THE IMPACT & WHERE DOES IT OCCUR?

#### WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?

The impact of 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.

#### WHICH STAKEHOLDERS ARE AFFECTED?

Affected stakeholders includes:

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

#### MANAGEMENT APPROACH

Following a key decision of the Board of Directors (BOD) of TKC Metals for the planned divestment of the shares, interest, and control of TKC Metals over Treasure Steelworks Corporation (TSC), TKC Metals has continuously and consistently ensured its delivery of a profitable performance for its key stakeholders through the effective implementation of proactive business methodologies geared towards a more cost-effective 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 market volatility exposure of TKC Metals, thus, creating an unlikely negative impression in the business community. These unlikely negative impressions in the business community may eventually result in a thorough evaluation and assessment of the economic ability of TKC Metals.	Affected stakeholders includes: <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	Under the strict supervision and guidance of its BOD, TKC Metals proactively reviews and update its operations and administrative controls and policies for implementation on a regular basis, ensuring a stable cash flow management or a steadily available 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
The ability of TKC Metals to increase its production capacity, as well as the ability of TKC Metals to implement a more competitive sales and marketing strategy are among the identified opportunities. These opportunities can possibly be exploited by TKC Metals through the generation of the required capital infusion, as well as through retaining and hiring competent employees.	Affected stakeholders includes: <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively conducts a market research and evaluation on a regular basis. The market research and evaluation aims to determine consumer preferences, appetite, and demands, as well as to identify current market trends that will support the planned increase in its level of operations.</p> <p>Synergistically, TKC Metals proactively addresses its working capital requirements, ensuring that its targeted level of operations is successfully achieved through the hiring of experts, competent professional employees, and consultants, who will fill in key positions.</p>



## Anti - Corruption

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/2017tkcmanualforcorporategovernance.pdf>

### Training on Anti - Corruption Policies & Procedures

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Percentage of Employees to whom the Organization's Anti - Corruption Policies & Procedures have been Communicated To	%	83.00	50.00	33.33	33.33	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	33.33	33.33

Economic

# Economic

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Percentage of Directors that have Received Anti - Corruption Training	%	2.00	47.33	0.00	0.00	0.00
Percentage of Employees that have Received Anti - Corruption Training	%	72.00	33.33	0.00	0.00	0.00

## Incidents of Corruption

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Number of Incident in which Directors were Removed or Disciplined for Corruption	#	0	0	0	0	0
Number of Incidents in which Employees were Dismissed or Disciplined for Corruption	#	2	3	0	0	0
Number of Incidents when Contracts with Business Partners were Terminated due to Incidents of Corruption	#	0	1	0	0	0

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

Corruption can occur across various functions in an organization. It has significant impact on the reputation and competitiveness of TKC Metals, detrimentally affecting the morale of our employees. Corruption may also adversely impact our relationship with our business partners (Suppliers, Vendors, Contractors, etc.) and may eventually result in a diminished Shareholder value.

### WHICH STAKEHOLDERS ARE AFFECTED?

Affected stakeholders includes:

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

### MANAGEMENT APPROACH

The 2017 Manual of Corporate Governance and the 2019 I - ACGR of TKC Metals embodies the existing policies, rules, and regulations of TKC Metals on anti - corruption. These policies, rules, and regulations on anti - corruption are being strictly implemented and monitored by TKC Metals. The level of compliance of TKC Metals BOD, Management Officers, and Employees on these existing policies, rules, and regulations are being proactively monitored on a regular basis.

### WHAT ARE THE RISKS IDENTIFIED?

The unfavorable level of corporate performance coupled with a weak balance sheet position enhances the market volatility exposure of TKC Metals, thus, creating an unlikely negative impression in the business community. These unlikely negative impressions in the business community may eventually result in a thorough evaluation and assessment of the economic ability of TKC Metals.

### WHICH STAKEHOLDERS ARE AFFECTED?

Affected stakeholders includes:

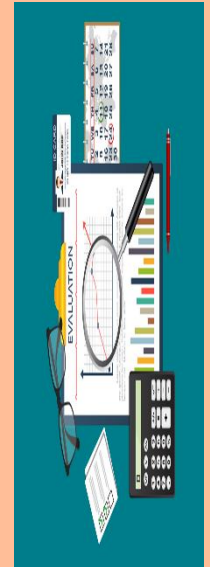
- Shareholders & Investors
- Employees
- Business Partners (Suppliers, Vendors, Contractors, etc.)
- Government Regulators
- Local Community

### MANAGEMENT APPROACH

The 2017 Manual of Corporate Governance and the 2019 I - ACGR of TKC Metals clearly states the strategic direction of TKC Metals towards the implementation of programs for safeguarding and protecting the interests, assets, and properties of TKC Metals in order to achieve its established financial targets.



WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>The need to significantly increase the level of awareness of TKC Metals Directors, Management Officers, Employees, and Business Partners (Suppliers, Vendors, Contractors, etc.) in its anti - corruption policy, rules, regulations, and practices through a comprehensive training and awareness programs, as well as the need to attract, employ, and retain highly qualified and competent personnel are among the identified opportunities.</p>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively ensures its compliance to the SEC and PSE mandated trainings for Directors and Key Management Officers.</p> <p>Synergistically, TKC Metals proactively pursue a suitable risk and anti - corruption training programs for its Directors, Management Officers, and Employees.</p>



# Economic

## Water & Effluents

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/2017tkcmanualforcorporategovernance.pdf>

### Effluents

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Total Volume of Water Discharged	Cubic Meters	11,395.00	0.00	1,800.00	1,626.39	1,626.39
Percent of Wastewater Recycled	%	0.00	0.00	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
<p>Improperly managed effluents may impact TKC Metals at multiple levels, which may include:</p> <ul style="list-style-type: none"> <li>▪ Potential loss in revenue due to imposition of monetary fines and non - monetary sanctions</li> <li>▪ Potential loss of reputation due to potential revocation of Environmental Compliance Certificate (ECC) and License to Operate (LTO)</li> <li>▪ Potential impacts to the health and safety of the Local Community where TKC Metals operates</li> </ul>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively implements an Environmental Management System (EMS) in accordance with the requirements of ISO 14001:2015, ensuring the continued compliance of TKC Metals to all applicable environmental laws, rules, and regulations.</p> <p>Synergistically, TKC Metals continues to employ a third party environmental management consultant, who guides TKC Metals in ensuring its continued environmental compliance and in managing its water consumption and wastewater discharges, as well as the designation of a dedicated Pollution Control Officer (PCO), who ensures the consistent monitoring of water consumption and wastewater discharges and the consistent implementation of good environmental practices, including the adaptation of the most feasible water conservation and wastewater reduction programs.</p>





WHAT ARE THE RISKS IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
Scarcity of water supply in the Local Community resulting in limited access to clean and safe water.	Affected stakeholders includes: <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively implements an Environmental Management System (EMS) in accordance with the requirements of ISO 14001:2015, ensuring the continued compliance of TKC Metals to all applicable environmental laws, rules, and regulations.</p> <p>Synergistically, TKC Metals has designated a dedicated Pollution Control Officer (PCO), who ensures the consistent monitoring of water consumption and wastewater discharges and the consistent implementation of good environmental practices, including the adaptation of the most feasible water conservation and wastewater reduction programs.</p>

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
Exploring opportunities for recycling generated wastewater.	Affected stakeholders includes: <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	Under the strict supervision and guidance of its BOD and guided by its existing EMS, as well as its firm commitment to minimize its environmental footprint, TKC Metals proactively undertakes a comprehensive study for recycling its generated wastewater.

## Solid & Hazardous Wastes

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/2017tkcmanualforcorporategovernance.pdf>

### Solid Waste

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Total Solid Waste Generated	kg	11,395.00	27,760.00	102,703.00	5,337.32	5,337.32
Reusable	kg	0.00	0.00	4,783.00	253.24	253.24
Recyclable	kg	0.00	27,400.00	96,840.00	5,032.63	5,032.63

# Environmental

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Composted	kg	0.00	0.00	0.00	0.00	0.00
Incinerated	kg	0.00	0.00	0.00	0.00	0.00
Residuals / Landfilled	kg	360.00	360.00	360.00	51.45	51.45

## Hazardous Waste

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Total Weight of Hazardous Waste Generated	kg	0.00	0.00	103.00	5.39	5.39
Total Weight of Hazardous Waste Transported	kg	0.00	0.00	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
<p>The generation of solid and hazardous wastes is inevitable in the day – to – day operations of any organization. Improperly managed generated solid and hazardous wastes presents potential impacts to human health and the immediate surroundings of the Local Community where TKC Metals operates.</p>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively implements an Environmental Management System (EMS) in accordance with the requirements of ISO 14001:2015, ensuring the continued compliance of TKC Metals to all applicable environmental laws, rules, and regulations.</p> <p>Synergistically, TKC Metals continues to employ a third party environmental management consultant, who guides TKC Metals in ensuring its continued environmental compliance and in managing its generated solid and hazardous wastes, as well as the designation of a dedicated Pollution Control Officer (PCO), who ensures the consistent management of TKC Metals environmental compliance and the consistent implementation of good environmental practices, including planning, rolling out, implementation, and monitoring of feasible waste reduction programs.</p>





WHAT ARE THE RISKS IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>The incidental exposure off the Local Community to improperly managed generated solid and hazardous wastes due to road traffic accident and accidental release or spill may:</p> <ul style="list-style-type: none"> <li>Adversely impact tourism opportunities</li> <li>Result into long - term ill - health effects for exposed individuals</li> <li>Eventually lead into limited access to decent life / livelihood</li> </ul>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>Shareholders &amp; Investors</li> <li>Employees</li> <li>Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>Government Regulators</li> <li>Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively implements an Environmental Management System (EMS) in accordance with the requirements of ISO 14001:2015, ensuring the continued compliance of TKC Metals to all applicable environmental laws, rules, and regulations.</p> <p>Synergistically, TKC Metals has designated a dedicated Pollution Control Officer (PCO), who ensures the consistent management of TKC Metals environmental compliance and the consistent implementation of good environmental practices, including planning, rolling out, implementation, and monitoring of feasible waste reduction programs. The dedicated PCO proactively ensures all generated solid and hazardous wastes is appropriately handled, transported, treated, and safely disposed.</p>



WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>In support with the goals of TKC Metals to minimize its environmental footprint, TKC Metals explores opportunities to optimize the diversion of its generated wastes away from the landfill.</p>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>Shareholders &amp; Investors</li> <li>Employees</li> <li>Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>Government Regulators</li> <li>Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD and guided by its existing EMS, as well as its firm commitment to minimize its environmental footprint, TKC Metals proactively plans to develop and establish a Waste Data Collection System for the proper implementation of the most suitable waste segregation scheme for our various generated waste streams.</p>

## Environmental Compliance

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/2017tkcmanualforcorporategovernance.pdf>

### Non - Compliance with Environmental Laws & Regulations

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Total Amount of Monetary Fines for Non - Compliance with Environmental Laws and / or Regulations	#	0	0	0	0	0

Environmental

# Environmental

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
No. of Non - Monetary Sanctions for Non - Compliance with Environmental Laws and / or Regulations	#	0	0	0	0	0
No. of Cases Resolved through Dispute Resolution Mechanism	#	0	0	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>Failure to comply with all applicable environmental laws, rules, and regulations impacts the quality of life in the Local Community where TKC Metals operates its business. It also has impacts on the reputation, brand image, and revenue performance of TKC Metals.</p>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively implements an Environmental Management System (EMS) in accordance with the requirements of ISO 14001:2015, ensuring the continued compliance of TKC Metals to all applicable environmental laws, rules, and regulations.</p> <p>Synergistically, TKC Metals continues to employ a third party environmental management consultant, who guides TKC Metals in ensuring its continued environmental compliance, as well as the designation of a dedicated Pollution Control Officer (PCO), who ensures the consistent management of TKC Metals environmental compliance and the consistent implementation of good environmental practices.</p>

WHAT ARE THE RISKS IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>The impacts of non - compliance to any applicable environmental laws, rules, and regulations happens at multiple levels and includes:</p> <ul style="list-style-type: none"> <li>▪ Gradual degradation of the existing environment</li> <li>▪ Potential decline in the associated opportunities for tourism</li> <li>▪ Potential loss in revenue due to imposition of monetary fines and non - monetary sanctions</li> <li>▪ Potential loss of reputation due to potential revocation of ECC and LTO</li> <li>▪ Potential impacts in the health and safety of the Local Community where TKC Metals operates</li> </ul>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD, TKC Metals proactively implements an Environmental Management System (EMS) in accordance with the requirements of ISO 14001:2015, ensuring the continued compliance of TKC Metals to all applicable environmental laws, rules, and regulations.</p> <p>Synergistically, TKC Metals continues to employ a third party environmental management consultant, who guides TKC Metals in ensuring its continued environmental compliance, as well as the designation of a dedicated Pollution Control Officer (PCO), who ensures the consistent management of TKC Metals environmental compliance and the consistent implementation of good environmental practices.</p>



WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	WHICH STAKEHOLDERS ARE AFFECTED?	MANAGEMENT APPROACH
<p>In support with the goals of TKC Metals to minimize its environmental footprint, TKC Metals explores opportunities to optimize the diversion of its generated wastes away from the landfill.</p>	<p>Affected stakeholders includes:</p> <ul style="list-style-type: none"> <li>▪ Shareholders &amp; Investors</li> <li>▪ Employees</li> <li>▪ Business Partners (Suppliers, Vendors, Contractors, etc.)</li> <li>▪ Government Regulators</li> <li>▪ Local Community</li> </ul>	<p>Under the strict supervision and guidance of its BOD and guided by its existing EMS, as well as its firm commitment to minimize its environmental footprint, TKC Metals proactively pursue its plan to adapt, roll out, implement, and monitor the most feasible environmental training and awareness programs for its employees and business partners (Suppliers, Vendors, Contractors, etc.) and the most feasible risk reduction strategies and programs to significantly reduce the potential impacts of its identified significant environmental aspects and risks.</p> <p>Synergistically, TKC Metals continues to employ a third party environmental management consultant, who guides TKC Metals in ensuring its continued environmental compliance.</p>



# Environmental

## Employee Management

### Employee Hiring & Benefits

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/2017tkcmanualforcorporategovernance.pdf>.

### Employee Data

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
<b>Total Number of Employees<sup>1</sup></b>						
a. Number of Female Employees	#	22	29	29	9	9
b. Number of Male Employees	#	66	61	63	18	18
Attrition Rate <sup>2</sup>	Rate	10.5	15.8	23.3	47.4	47.4
Ratio of Lowest Paid Employee Against Minimum Wage <sup>3</sup>	Ratio	1:1.59	1:1.59	1:1.59	1:1.59	1:1.59

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

<sup>2</sup>Attrition Rate =  $\frac{\text{Total Number of New Hires} - \text{Total Number of Turnovers}}{\text{Total Number of Employees for Previous Year} + \text{Total Number of Employees for Current Year}}$

<sup>3</sup>Ration = Minimum Wage : Lowest Paid Employee

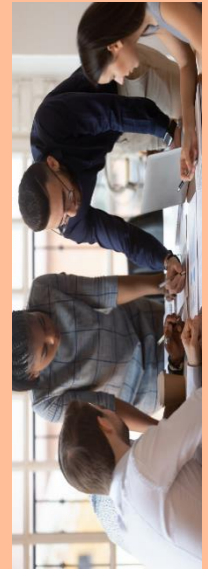
### Employee Benefits

DISCLOSURE	Y / N					% FEMALE EMPLOYEES WHO AVAILED				
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
SSS	Y	Y	Y	Y	Y	95.45	31.82	33.33	33.33	33.33
PhilHealth	Y	Y	Y	Y	Y	90.91	31.82	33.33	33.33	33.33
PAG - IBIG	Y	Y	Y	Y	Y	95.45	31.82	33.33	33.33	33.33
Parental Leaves	Y	Y	Y	Y	Y	0.00	0.00	0.00	0.00	0.00



DISCLOSURE	Y / N					% FEMALE EMPLOYEES WHO AVAILED				
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
Vacation Leaves	Y	Y	Y	Y	Y	95.45	90.91	66.57	66.57	66.57
Sick Leaves	Y	Y	Y	Y	Y	63.68	68.22	33.38	33.38	33.38
Medical Benefits (Aside from PhilHealth)	Y	Y	Y	Y	Y	0.00	59.09	33.33	33.33	33.33
Housing Assistance (Aside from PAG - IBIG)	Y	Y	Y	Y	Y	14.70	0.00	0.00	0.00	0.00
Retirement Fund (Aside from SSS)	Y	Y	Y	Y	Y	0.00	0.00	0.00	0.00	0.00
Further Education Support	Y	N	N	N	N	0.00	0.00	0.00	0.00	0.00
Company Stock Options	N	N	N	N	N	0.00	0.00	0.00	0.00	0.00
Telecommuting	Y	Y	Y	Y	Y	4.55	4.55	33.33	33.33	33.33
Flexible Work Arrangement (FWA)	Y	Y	Y	Y	Y	9.09	9.09	33.33	33.33	33.33

DISCLOSURE	Y / N					% MALE EMPLOYEES WHO AVAILED				
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
SSS	Y	Y	Y	Y	Y	90.91	12.12	33.33	33.33	33.33
PhilHealth	Y	Y	Y	Y	Y	87.88	12.12	33.33	33.33	33.33
PAG - IBIG	Y	Y	Y	Y	Y	90.91	12.12	33.33	33.33	33.33
Parental Leaves	Y	Y	Y	Y	Y	0.00	0.00	0.00	0.00	0.00
Vacation Leaves	Y	Y	Y	Y	Y	92.48	87.88	66.67	66.67	66.67
Sick Leaves	Y	Y	Y	Y	Y	80.38	87.89	33.38	33.38	33.38
Medical Benefits (Aside from PhilHealth)	Y	Y	Y	Y	Y	0.00	75.76	33.33	33.33	33.33
Housing Assistance (Aside from PAG - IBIG)	Y	Y	Y	Y	Y	22.73	0.00	0.00	0.00	0.00
Retirement Fund (Aside from SSS)	Y	Y	Y	Y	Y	0.02	0.02	0.07	0.07	0.07



Social

# Social

DISCLOSURE	Y / N					% MALE EMPLOYEES WHO AVAILED				
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
Further Education Support	Y	N	N	N	N	0.00	0.00	0.00	0.00	0.00
Company Stock Options	N	N	N	N	N	0.00	0.00	0.00	0.00	0.00
Telecommuting	Y	Y	Y	Y	Y	4.61	6.06	16.67	16.67	16.67
Flexible Work Arrangement (FWA)	Y	Y	Y	Y	Y	12.15	12.15	33.40	33.40	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 eventually limits the ability of TKC Metals to hire and retain the best talents. This may result to high attrition rates, wherein employees of TKC Metals seeks employment opportunities elsewhere.

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing labor laws, rules, and regulations mandated by the Philippines Department of Labor and Employment (DOLE) and other appropriate government entities. The sustained compliance of TKC Metals is attributed to its commitment towards the establishment, implementation, maintenance, and monitoring of relevant company policies that manages, protects, and cares for the welfare and benefits of TKC Metals 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 and includes:

- Dissatisfaction of TKC Metals employees, resulting in shortage of critical skills and difficulty in sourcing qualified replacements
- Attrition / loss of TKC Metals employees to its competitors, resulting in an increased number of exiting employees
- Possible retirement

Under the strict supervision and guidance of its BOD, TKC Metals proactively identify and implement the most feasible above industry standard benefit packages and work set up to attract and retain qualified talents and employees, enhancing the corporate brand image of TKC Metals.

Synergistically, TKC Metals also proactively pursue the provision of the most suitable training and development programs for its employees.

### WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?

### MANAGEMENT APPROACH

The readily available pool of qualified talents looking for employment opportunities coupled with the new normal hybrid work set up and regular benchmarking with relevant industry performers is an opportunity that TKC Metals intends to exploit to be the employer of choice for prospective talents, further enhancing the corporate brand image of TKC Metals.

Under the strict supervision and guidance of its BOD, TKC Metals proactively identify and implement the most feasible above industry standard benefit packages and work set up to attract and retain qualified talents and employees, enhancing the corporate brand image of TKC Metals.



## Employee Training & Development

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/2017tkcmanualforcorporategovernance.pdf>



Total	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
<b>Total Training Hours Provided to Employees</b>						
a. Female Employees	hours	150	150	150	150	150
b. Male Employees	hours	150	150	150	150	150
<b>Average Training Hours Provided to Employees</b>						
a. Female Employees	hours/employee	6.82	5.17	7.50	7.50	7.50
b. Male Employees	hours/employee	2.27	2.27	3.19	3.19	3.19

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

### MANAGEMENT APPROACH

The impact of appropriately trained employees happens at multiple levels and includes:

- Influence on the ability of TKC Metals to operate at the highest business ethical standards
- Customer satisfaction
- Career advancement of the respective employee
- Promoting a safe and healthy workplace

Under the strict supervision and guidance of its BOD, TKC Metals proactively approves an annual Employee Learning & Development resources allocation based on the most suitable and most effective training & development programs and strategies.

Strategically, TKC Metals proactively analyze the training needs of the organization on a regular basis to identify specific skill gaps for sufficient allocation of resources and proactively prefers the utilization of online learning platforms.

### WHAT ARE THE RISKS IDENTIFIED?

### MANAGEMENT APPROACH

The drive to enforce the training and ensure its effectiveness coupled with the lack of commitment to proactively participate in the provided training are the identified risks in TKC Metals learning and development.

Under the strict supervision and guidance of its BOD, TKC Metals proactively approves an annual Employee Learning & Development resources allocation based on the most suitable and most effective training & development programs and strategies.

Strategically, TKC Metals proactively analyze the training needs of the organization on a regular basis to identify specific skill gaps for sufficient allocation of resources and proactively prefers the utilization of online learning platforms.

Social



# Social

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	MANAGEMENT APPROACH
The increased demand for self – development coupled with the growing demand for online training is the learning and development opportunity that TKC Metals intends to exploit.	Under the strict supervision and guidance of its BOD, TKC Metals proactively approves an annual Employee Learning & Development resources allocation based on the most suitable and most effective training & development programs and strategies.  Strategically, TKC Metals proactively analyze the training needs of the organization on a regular basis to identify specific skill gaps for sufficient allocation of resources and proactively prefers the utilization of online learning platforms.

## Diversity & Equal Opportunity

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/2017tkcmanualforcorporategovernance.pdf>.

DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
% of Female in the Workforce	%	25.00	32.22	31.52	33.33	33.33
% of Male in the Workforce	%	75.00	67.78	68.48	66.67	66.67
Number of Employees from Indigenous Communities and / or Vulnerable Sector <sup>4</sup>	#	0	42	3	3	3

<sup>4</sup>Vulnerable Sector includes Elderly, Persons with Disability (PWD), Vulnerable Woman, Refugees, Migrants, Internally Displaced Persons (IDPs), Persons 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?	MANAGEMENT APPROACH
Diversity and equal opportunity employment enhances the ability of TKC Metals to attract and retain preferred talents and helps bolster the reputation and corporate brand image of TKC Metals as an equal opportunity employer and an employer of choice for top talents.	Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its adaption of a systematic approach for continuously promoting and cultivating diversity and equal opportunity within TCK Metals employment lifecycle (talent acquisition, learning and development).



RE THE RISKS IDENTIFIED?	MANAGEMENT APPROACH
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Incidents of discrimination and harassment leads to voluntary separation of employees and negatively impacts the ability of TKC Metals to attract and retain top talents, tainting the reputation and corporate brand image of TKC Metals,

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its adaption of a systematic approach for continuously promoting and cultivating diversity and equal opportunity within TCK Metals employment lifecycle (talent acquisition, learning and development).



WHAT ARE THE OPPORTUNITY/IE IDENTIFIED?	MANAGEMENT APPROACH
Exploring opportunities for promoting a culture of diversity.	Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its adaption of a systematic approach for continuously promoting and cultivating diversity and equal opportunity within TCK Metals employment lifecycle (talent acquisition, learning and development).

## Workplace Conditions, Labor Standards, & Human Rights

### Occupational Health & Safety

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/2017tkcmanualforcorporategovernance.pdf>.

Total	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Safe Man - Hours	man - hours	32	32	56,000	56,000	56,000
Number of Work - Related Injuries	#	7	2	1	0	0
Number of Work - Related Fatalities	#	0	0	0	0	0
Number of Work - Related Ill- Health	#	0	0	0	0	0
Number of Safety Drills	#	4	4	2	2	2

# Social

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

The Occupational Health & Safety (OHS) performance of TKC Metals affects the quality of service it provides, impacts its operational costs, and influences the morale of its employees.

**MANAGEMENT APPROACH**

Under the strict supervision and guidance of its BOD, TKC Metals proactively implement, maintain, and monitor an Occupational Health & Safety (OHS) management system in accordance with the requirements of ISO 45001:2018 to sustain its compliance with all applicable and relevant OHS requirements based on applicable, relevant, and existing OHS laws, rules, and regulations. The sustained compliance of TKC Metals proactively maintains a safe, healthy, and labor - oriented work environment, identifying and controlling OHS hazards in the workplace.

**WHAT ARE THE RISKS IDENTIFIED?**

Incidents of fatality, serious injury, and / or damage to property results in increased operational costs and adverse impacts on the confidence of TKC Metals shareholders and investors, significantly damaging the reputation and corporate brand image of TKC Metals and negatively affecting its relationship with the Local Community where TKC Metals operates

**MANAGEMENT APPROACH**

Under the strict supervision and guidance of its BOD, TKC Metals proactively implement, maintain, and monitor an Occupational Health & Safety (OHS) management system in accordance with the requirements of ISO 45001:2018 to sustain its compliance with all applicable and relevant OHS requirements based on applicable, relevant, and existing OHS laws, rules, and regulations. The sustained compliance of TKC Metals proactively maintains a safe, healthy, and labor - oriented work environment, identifying and controlling OHS hazards in the workplace.

**WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?**

The proactive allocation of sufficient resources for promoting and providing a safe and healthy workplace resulting in a boosted morale of TKC Metals employees is the identified opportunity intended to be exploited.

**MANAGEMENT APPROACH**

Under the strict supervision and guidance of its BOD, TKC Metals proactively implement, maintain, and monitor an Occupational Health & Safety (OHS) management system in accordance with the requirements of ISO 45001:2018 to sustain its compliance with all applicable and relevant OHS requirements based on applicable, relevant, and existing OHS laws, rules, and regulations. The sustained compliance of TKC Metals proactively maintains a safe, healthy, and labor - oriented work environment, identifying and controlling OHS hazards in the workplace.

**Labor Laws & Human Rights**

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/2017tkcmanualforcorporategovernance.pdf>



DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Number of Legal Actions or Employees Grievance Involving Forced or Child Labor	#	0	0	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**



DISCLOSURE	Y / N					IF YES, CITE REFERENCE IN COMPANY POLICY				
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
Forced Labor	N	N	Y	Y	Y	N / A	N / A	Staff Manual	Staff Manual	Staff Manual
Child Labor	N	N	Y	Y	Y	N / A	N / A	Staff Manual	Staff Manual	Staff Manual
Human Rights	N	N	Y	Y	Y	N / A	N / A	Staff Manual	Staff Manual	Staff Manual

WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION’S INVOLVEMENT IN THE IMPACT?	MANAGEMENT APPROACH
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Incidents of non-compliance to any applicable, relevant, and existing labor and social laws, rules, and regulations negatively influences the ability of TKC Metals to attract and retain top talents, negatively impacting the reputation and corporate brand image of TKC Metals as an employer of choice.

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing labor laws, rules, and regulations mandated by the Philippines Department of Labor and Employment (DOLE) and other appropriate government entities. The sustained compliance of TKC Metals is attributed to its commitment towards the establishment, implementation, maintenance, and monitoring of relevant company policies that manages, protects, and cares for the welfare of TKC Metals employees against unfair labor practices such as child labor, forced labor, and human rights violations.

Synergistically, TKC Metals proactively pursue the adaption of an industry recognized system of reporting, identification, investigation, monitoring, and resolving incidents of labor laws and human rights violations.

WHAT ARE THE RISKS IDENTIFIED?	MANAGEMENT APPROACH
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Failure to comply with the applicable, relevant, and existing labor and social laws, rules, and regulations negatively influences the ability of TKC Metals to attract and retain top talents, negatively impacting the reputation and corporate brand image of TKC Metals and resulting in a scrutiny of DOLE and other relevant government entities.

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing labor laws, rules, and regulations mandated by the Philippines Department of Labor and Employment (DOLE) and other appropriate government entities. The sustained compliance of TKC Metals is attributed to its commitment towards the establishment, implementation, maintenance, and monitoring of relevant company policies that manages, protects, and cares for the welfare of TKC Metals employees against unfair labor practices such as child labor, forced labor, and human rights violations.

Synergistically, TKC Metals proactively pursue the adaption of an industry recognized system of reporting, identification, investigation, monitoring, and resolving incidents of labor laws and human rights violations.

Social

# Social

WHAT ARE THE OPPORTUNITY/IES IDENTIFIED?	MANAGEMENT APPROACH
Benchmarking for the adaption and implementation of good labor practices from relevant industry.	Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing labor laws, rules, and regulations mandated by the Philippines Department of Labor and Employment (DOLE) and other appropriate government entities. The sustained compliance of TKC Metals is attributed to its commitment towards the establishment, implementation, maintenance, and monitoring of relevant company policies that manages, protects, and cares for the welfare of TKC Metals employees against unfair labor practices such as child labor, forced labor, and human rights violations.

## Customer Management

### Customer Satisfaction

The policy of TKC Metals on customer satisfaction is embedded on TKC Metals 2017 Manual on Corporate Governance

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DISCLOSURE	SCORE					DID A THIRD PARTY CONDUCT THE CUSTOMER SATISFACTION STUDY? (Y / N)				
	2019	2020	2021	2022	2023	2019	2020	2021	2022	2023
Customer Satisfaction	83	0	0	0	0	N	N	N	N	N



WHAT IS THE IMPACT & WHERE DOES IT OCCUR? WHAT IS THE ORGANIZATION'S INVOLVEMENT IN THE IMPACT?	MANAGEMENT APPROACH
The level of customer satisfaction affects the overall performance of TKC Metals. Dissatisfied customers and / or customers experiencing inconveniences oftentimes become physically and / or verbally abusive, affecting the servicing employee(s) and exposing them to physical, mental, and / or emotional stress.	Under the strict supervision and guidance of its BOD, TKC Metals proactively adapts a customer mindset framework that identifies and addresses the needs and expectations of TKC Metals customers and strictly observe, adhere, and implement all applicable, relevant, and existing company policies, rules, and regulations, ensuring continued customer satisfaction.  Synergistically, TKC Metals proactively approves sufficient customer management resource allocation and pursue the adaption of an industry recognized system of reporting, identification, investigation, monitoring, and resolving customer concerns.



WHAT ARE THE RISKS IDENTIFIED?	MANAGEMENT APPROACH
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The changing needs and expectations of TKC Metals customers , resulting in their dissatisfaction and affecting the overall business performance, reputation, and corporate brand image f TKC Metals.

Under the strict supervision and guidance of its BOD, TKC Metals proactively adapts a customer mindset framework that identifies and addresses the needs and expectations of TKC Metals customers and strictly observe, adhere, and implement all applicable, relevant, and existing company policies, rules, and regulations, ensuring continued customer satisfaction.

Synergistically, TKC Metals proactively approves sufficient customer management resource allocation and pursue the adaption of an industry recognized system of reporting, identification, investigation, monitoring, and resolving customer concerns.

WHAT ARE THE OPPORTUNITY/IE IDENTIFIED?	MANAGEMENT APPROACH
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Operating at the highest business ethical standard from well – motivated and appropriately informed employees

Under the strict supervision and guidance of its BOD, TKC Metals proactively adapts a customer mindset framework that identifies and addresses the needs and expectations of TKC Metals customers and strictly observe, adhere, and implement all applicable, relevant, and existing company policies, rules, and regulations, ensuring continued customer satisfaction.

Synergistically, TKC Metals proactively approves sufficient customer management resource allocation and pursue the adaption of an industry recognized system of reporting, identification, investigation, monitoring, and resolving customer concerns.

### Customer Privacy

The policy of TKC Metals on customer privacy is embedded on TKC Metals 2017 Manual on Corporate Governance

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DISCLOSURE	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Number of Substantiated Complaints <sup>5</sup> on Customer Privacy	#	0	0	0	0	0
Number of Complaints Addressed	#	0	0	0	0	0
Number of Customers, Users, and Account Holders whose Information is Used for Secondary Purposes	#	0	0	0	0	0

<sup>5</sup>Substantiated Complaints include complaints from customer 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

Social

# Social

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

Protecting the privacy of TKC Metals customers is its topmost priority and values the confidence of both the local and business community were TKC Metals operates. TKC Metals immediately takes serious actions to address incidents of breaches to customer privacy.

**MANAGEMENT APPROACH**

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing customer and data privacy and security laws, rules, and regulations. The sustained compliance of TKC Metals is attributed to its commitment towards the adaption of the most suitable and most effective customer and data privacy and security policies and procedures based on industry standards.

Synergistically, TKC Metals proactively approves sufficient resource allocation for the effective implementation of TKC Metals customer and data privacy and security policies and procedures, as well as proactively pursue the adaption of an industry recognized system for customer and data privacy and security audits and training and development programs.

**WHAT ARE THE RISKS IDENTIFIED?**

Incidents of breaches to customer privacy oftentimes results in the loss of trust and confidence of TKC Metals shareholders and investors, employees, customers, business partners (Suppliers, Vendors, etc.), government regulators, and local community, significantly damaging the reputation and corporate brand image of TKC Metals.

**MANAGEMENT APPROACH**

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing customer and data privacy and security laws, rules, and regulations. The sustained compliance of TKC Metals is attributed to its commitment towards the adaption of the most suitable and most effective customer and data privacy and security policies and procedures based on industry standards.

Synergistically, TKC Metals proactively approves sufficient resource allocation for the effective implementation of TKC Metals customer and data privacy and security policies and procedures, as well as proactively pursue the adaption of an industry recognized system for customer and data privacy and security audits and training and development programs.

**WHAT ARE THE OPPORTUNITY/IE IDENTIFIED?**

Operating at the highest business ethical standard from well – motivated and appropriately informed employees

**MANAGEMENT APPROACH**

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing customer and data privacy and security laws, rules, and regulations. The sustained compliance of TKC Metals is attributed to its commitment towards the adaption of the most suitable and most effective customer and data privacy and security policies and procedures based on industry standards.

Synergistically, TKC Metals proactively approves sufficient resource allocation for the effective implementation of TKC Metals customer and data privacy and security policies and procedures, as well as proactively pursue the adaption of an industry recognized system for customer and data privacy and security audits and training and development programs.





## Data Security

The policy of TKC Metals on data security is embedded on TKC Metals 2017 Manual on Corporate Governance

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Total	UNIT	QUANTITY				
		2019	2020	2021	2022	2023
Number of Data Breaches, Including Leaks, Thefts, and Losses of Data	#	0	0	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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Protecting the privacy and security of TKC Metals data is its topmost priority and values the confidence of both the local and business community where TKC Metals operates. TKC Metals immediately takes serious actions to address incidents of breaches to customer privacy.

Under the strict supervision and guidance of its BOD, TKC Metals proactively sustained its compliance with the requirements of all applicable, relevant, and existing customer and data privacy and security laws, rules, and regulations. The sustained compliance of TKC Metals is attributed to its commitment towards the adaption of the most suitable and most effective customer and data privacy and security policies and procedures based on industry standards.

Synergistically, TKC Metals proactively approves sufficient resource allocation for the effective implementation of TKC Metals customer and data privacy and security policies and procedures, as well as proactively pursue the adaption of an industry recognized system for customer and data privacy and security audits and training and development programs.

WHAT ARE THE RISKS IDENTIFIED?	MANAGEMENT APPROACH
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Incidents of breaches to customer privacy oftentimes results in the loss of trust and confidence of TKC Metals shareholders and investors, employees, customers, business partners (Suppliers, Vendors, etc.), government regulators, and local community, significantly damaging the reputation and corporate brand image of TKC Metals.

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Social

# Social

## WHAT ARE THE OPPORTUNITY/IE IDENTIFIED?

Operating at the highest business ethical standard from well – motivated and appropriately informed employees

## MANAGEMENT APPROACH

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**TKC METALS**  
Strength in vision