



mainroads
WESTERN AUSTRALIA

GRI Content Index and Supplementary Information



Sustainability Supplement for 2018 Annual Report

This supplement provides additional supporting disclosures for our 2018 Annual Report. It is intended that it clarifies sustainability within our context, provides further explanatory information on our most important issues and tracks these issues and topics back to the Global Reporting Initiative indicators.

Defining Sustainability

Sustainability, within our context is defined as a commitment to 'creating lasting benefits through an integrated consideration of social, environmental and economic aspects in all that we do'. Another way of stating this, is that we meet the needs of today without compromising the needs of future generations. Our interpretation of sustainability is based on the definitions within the [State Sustainability Strategy 2003](#). For further information refer to our [website](#).

Emergent Challenges & Trends

Road Safety has major social implications and we continue to endeavour to find ways reduce the burden on our communities. We are also increasingly aware that this also includes security. There is an increasing trend for vehicles to be used as a tool of terror during events and in crowded locations. The guidance we provide for traffic management for events that utilise our road space has been revised to improve security as a result of incidents that have occurred around the world, including in Australia.

Our works and operations impact communities that live and work within close proximity. Acquisition of property, noise and business continuity are examples of issues that need to be carefully managed, require stakeholder engagement and impact our role as good neighbours. This is an ongoing issue and we continue to evolve our approach to undertaking our works so that any negative impacts are minimised and we can also leverage any opportunities for stimulating local economies.

The increased use of recycled input materials for road construction is key to reducing our overall environmental burden. We have experienced a lower than expected uptake of the use of recycled materials from within our industry due to a risk that waste derived materials may attract the Landfill Levy. We are working with regulators to seek clarity on this issue and enable the use of recycled input materials within our projects.

Concern for public health and our workforce from construction related activities continues to be a concern to us, as it is to the broader community. The media continues to document times when the broader construction industry breaches public trust in the health security of the materials selected for use. We implement processes to ensure that the materials streams that are utilised for all aspects road construction are not imposing undue risk of exposure to contaminants, or substances that increase health risk. Responses includes our materials specifications, audits and other contract conditions.

We acknowledge the traditional custodians of Western Australia's lands and aim to protect Aboriginal cultural values wherever possible. We recognise that there is an unacceptable level of disadvantage in living standards, life expectancy, education, health and employment experienced by Aboriginal peoples. We are committed to making a change in our industry

and progressing reconciliation and we are increasing being ask to take the lead in our regional areas and contribute to increasing the level of aboriginal employment as a result of our contracts.

Climate change in Western Australia continues to impact network resilience. Much uncertainty remains as to what will be the extent of the impacts of climate changes on the road network. The difficulty in predicting what the impacts will be makes it difficult to determine the most appropriate response. For example, in South Western Australia we are expected to experience a number of general climate change risks which include decreasing winter rainfall, overall increased temperature, more hot spells, more extreme rainfall events and sea level rise. We have taken conservative steps to adapt new infrastructure to increases in sea level.

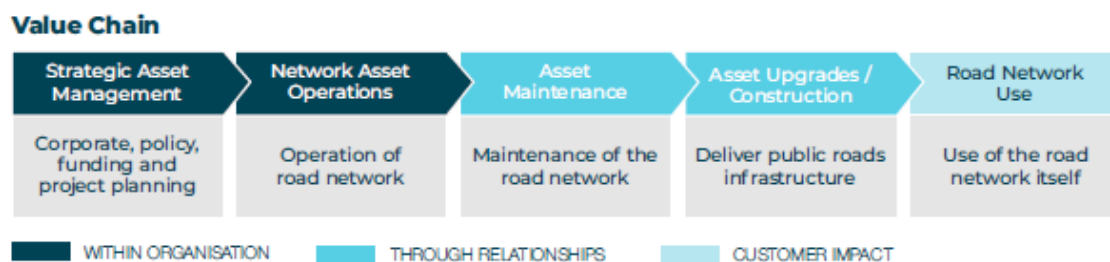
The expectation to contribute to climate change mitigation continues to take shape. Generally there is an expectation to contribute in this space. There has been a continued focus in reducing emissions from transport from key lobbyists in the climate space. Internationally, transport agencies are being delegated broader responsibility to improve air quality within urban areas including the reduction of greenhouse gas emissions from the use of transport networks. For us the expectation is how we can provide services that assist the economy to transition to lower emissions transport such as low and zero emissions vehicles.

Zero emission vehicles, such as electric vehicles, present many benefits for Western Australian Transport. Crucially, they allow transport to reduce its climate change impacts but also potentially improve amenity through lower noise, can be designed safer with lower centre of gravity vehicles, reduce air pollution and health impacts in urban areas and improve fuel security and transport affordability. However, large portions of our funding is linked to fuel excise which electric vehicles currently do not pay.

Our Sustainability Impacts across our Supply Chain Activities

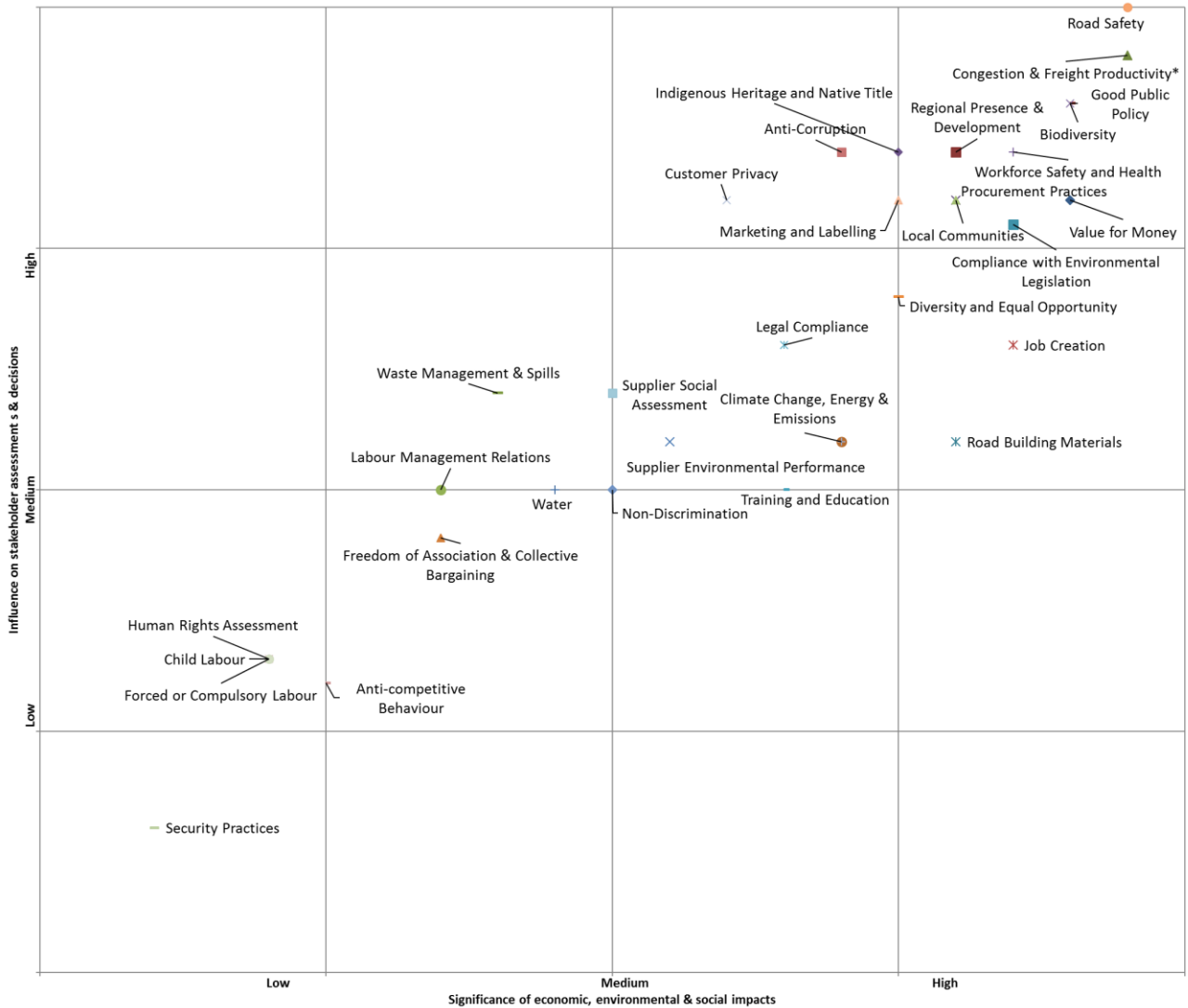
Main Roads is custodian of the State road network in Western Australia. We invest in, operate and maintain the road network for the good of all Western Australians and the road user. Aspects of the services we deliver we delegate responsibility for delivery to other organisations. Activities such as construction and maintenance of infrastructure assets are outsourced to civil contractors.

The graphic below describes at a high level the activities that Main Roads undertakes to deliver its services to the community and how this translates into Main Roads material issues for Sustainability. It also describes at which point Main Roads has the capacity to influence or manage the issue and at what stage the impact of the issue takes place.



Addressing our most important material issues

Material Aspects for Sustainability - 2018



The results of our Materiality review are demonstrated in the above graphic. The chart is a visualisation of what our stakeholders are interested in and what our greatest impacts to sustainability are. The following is a description of our some of our key aspect areas and includes what our key impacts, risks and opportunities are.

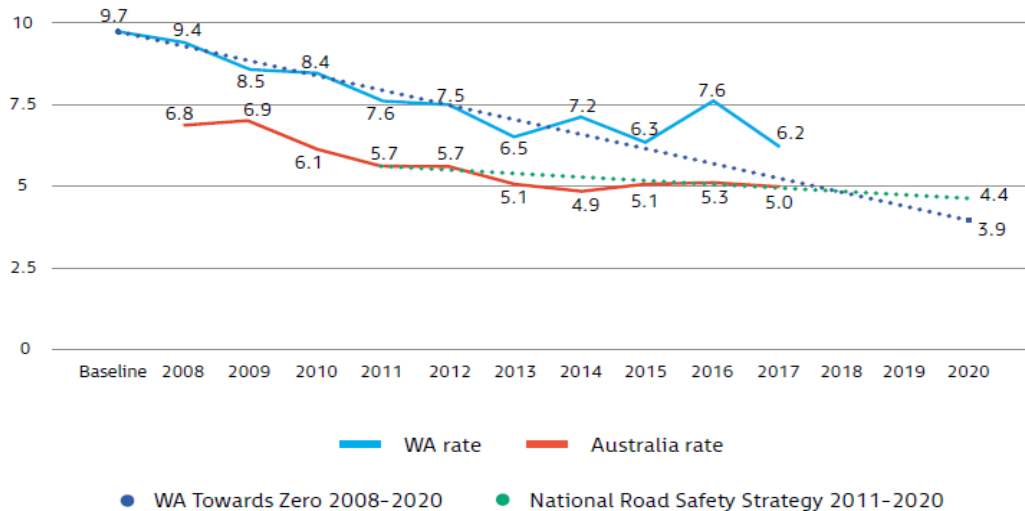
Road Safety (Customer Health and Safety)

There is a safety risk associated with the use of the road network. Western Australia is the worst performing mainland Australian state with 6.2 road deaths per 100,000 population per year; over 40% above the national average. Our performance is similarly poor when deaths per 100 million vehicle kilometres travelled is used. We believe no one should die or be seriously injured on the



State's road network, and we will manage the network to minimise the likelihood of road trauma to all road users.

Figure 1. Fatality rates per 100,000 population¹



¹Denominators from Australian Bureau of Statistics. (2017). Australian demographic statistics, Australia, June 2017, (Catalogue No. 3101.0). Retrieved from <http://www.abs.gov.au/ausstats/abs@.nsf/mf/3101.0>

²Department of Infrastructure, Regional Development and Cities (BITRE). Australian Road Deaths Database, December 2017. Retrieved from https://bitre.gov.au/statistics/safety/files/BITRE_ARDD_Fatalities_December_2017.xlsx

Being the state road agency in Western Australia we are custodians of the approach to road safety in road infrastructure. We are expected to be systematically addressing the priority high risk areas across the road network. In Western Australia, through the Road Safety Commission, we have adopted a Safe System philosophy to our road Safety Strategy 'The Road Towards Zero'. The Safe System acknowledges that human error within the transport system is inevitable, and that when it does occur the system makes allowance for these errors so as to minimise the risk of serious injury or death.

The Safe System approach is based on four key cornerstones:

- Safer vehicles
- Safer speeds
- Safer drivers
- Safer roads and roadsides

For Main Roads we are applying the Safe System approach to our roads and roadsides and the speeds that are set on the road network to make road environments more forgiving of human error. This approach flows through most aspects of what we do including project prioritisation, road design and design standards and road safety auditing.

The adoption of ROSMA will help us meet our state and national targets for road trauma reduction. It is built in line with ISO 39001 for Road Traffic Safety and drives best practice in the application of Safe System principles to projects and activities. ROSMA was launched in June 2016 and hundreds of employees have completed ROSMA operator training. Main Roads is committed to implementation of the state strategy – Road Safety Strategy Towards Zero 2008-2020 through the establishment of road safety as one of its cornerstones in our corporate plan. Our commitment to road safety is defined in the [Main Roads Road Safety policy](#).

Furthermore, the way our communities currently use and access the road network has adverse impacts on human health. For example, it is recognised that globally, every year more people die from vehicle emissions than from road accidents. Improving transport mode choice has implications for improved health and more active life styles. With 60 per cent of Australian adults getting less than the recommended 30 minutes of moderate intensity physical activity every day. Providing facilities for active transport can be one way of addressing the issue.

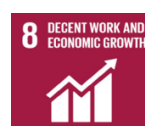
For further information on our performance refer to the references in the [Customer Health and Safety section](#) of the GRI table.

Congestion and Freight Productivity (In-direct Economic Performance)

It is one of our core objectives to reduce the negative impacts to our community and economy from congestion of the road network and provide better access for our freight customers to improve that sectors productivity. We do this through prioritising which projects are delivered to manage congestion, managing road traffic policies and practices, such as traffic signal timing, that facilitate safe and efficient movement of traffic on the road network and managing all planned and unplanned events on the network to optimise traffic flow and minimise disruptions on the road network.

Road related expenditure makes up approximately 8% of total State government spending. The right infrastructure investments with high cost benefit ratios can unlocked greater economic benefits throughout our value chain for all Western Australians.

Main Roads considers indirect economic impacts from investment and non-investment during project selection phase. We use a needs identification framework using Customer Levels of Service, which includes consideration of safety, travel experience, accessibility, amenity and reliability, to highlight deficiencies on the network. This method ensures we aren't just looking at asset deficiencies – recognises that an asset in itself does create value but it's the outcome that the asset delivers. This framework also ensures our rural and remote communities are consistently considered in the identification of needs and project selection. Further we consider access to community infrastructure (schools, hospitals, stadiums etc.) through collaboration with the relevant government agency (Health department, Education Department, Sport and Recreation).



Main Roads adopts the Treasury Prioritisation Methodology to prioritise potential projects (for an investment decision) and for projects (for a funding decision). Business case guidelines detail the minimum requirements from investments from both a State and Commonwealth perspective. We include in-direct economic benefits that are outside the scope of the usual benefit cost assessment described above by including wider economic benefits in submissions.

Main Roads has adopted a post project evaluation framework to measure project success – to ensure we are achieving the intended KPI's and outcomes from project investment. This Benefit Realisation Framework is endorsed by ATAP and is a key feature of ISCA's Rating Tool, V2.0.

For further information on our performance refer to the references in the [Economic Performance section](#) of the GRI table.

Good public policy

As a Statutory Authority it is key we ensure clear and transparent relationships between the elected government to prevent any undue influence in the administration of the public function and to ensure the swift and efficient implementation of government policies and strategies.



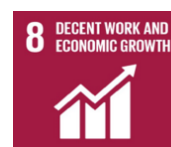
The Public Sector Commission provides direction and guidance to Main Roads on what constitutes good governance in the Public Sector. A number of mechanisms are in place to inform agencies of direction and disseminate information. This includes Commissioners Instructions and Public Sector Commissioners Circulars.



For further information on our performance refer to the references in the [Public Policy section](#) of the GRI table.

Value for Money (Direct economic impacts)

We must make the most effective use of the government (both State and Commonwealth) funding we receive to deliver our road network services. This include contributing to overall economic growth. The road network and construction industry has many flow on effects for our economy. Our investments are considered to have a multiplier of 2.3 for jobs creation. That is, for every direct job created by our investments, a further 2.3 are created throughout the economy as a whole. Improvements in road network efficiency can also lead to increases in the competitiveness of industries that rely on transport.



There are also potentially negative in-direct economic impacts for over optimising for road based transport that are related to equity. In Western Australia, low-income households are spending approximately 12 per cent of their income on utility bills and fuel each week, compared with 2.9 per cent for high-income households. WA's average fuel spend is \$63 per week which is higher than all other states, except NT.

For further information on our performance refer to the references in the [In-direct Economic Impacts section](#) of the GRI table.

Workforce Safety & Health

A predominant amount of our workforce is directly engaged in road construction activities. Our contract workforce work environment interfaces with the road environment, moving traffic and heavy machinery. The construction industry itself is characterised by activities that are considered high risk from a safety perspective. According to Safe Work Australia the construction industry is consistently among the top few industries with the highest number of serious incidents. It has the fifth highest incidence rate of all industries.

We aim to influence safe practice throughout our business including on our projects and for road maintenance where we have a principal-contractor relationship. We require our contractors to provide safety related information including the reporting of serious incidents and reporting to our external bodies such as WorkSafe or EnergySafe if required.

Each project provides a Monthly Safety Indicator report that includes information that is collated to form our corporate dashboard:

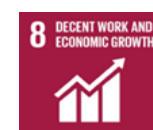
- Number of Lost Time Injuries
- Number of serious incidents
- Serious incidents that were reported in 24 hours
- Contractor hours
- Number of hazards closed out within 30 days.

The safety of Main Roads staff and those working directly and indirectly on road within its jurisdiction is managed within the scope of our Safety Health and Wellbeing management system that is being maintained in accordance with AS 4801:2001 Occupational Health and Safety Management System and in compliance with the Occupational Safety and Health Act 1984.

Main Roads WA maintains road safety stats related to people working that are under the direct and indirect control of Main Roads, through the Workers' Compensation and Injury Management Regulations 1982. Any statistics and details for fatal and serious injuries will be picked up through police reporting mechanism and be processed by Road Safety Branch.

Therefore our strategy for reducing fatal and serious injury on the state road network is focused on the areas that Main Roads can directly influence, which are:

- Ensuring that projects implemented on the state road network are assessed, selected, developed and delivered with the aim of reducing death and serious injury
- Developing and delivering effective road safety treatment programs
- Operate and implement policies that manage the risk of being killed or seriously injured on our roads or while working directly or indirectly for Main Roads



For further information on our performance refer to the references in the [Occupational Health & Safety section](#) of the GRI table.

Biodiversity

We acknowledge that our actions have the potential to cause negative environmental impacts to Western Australia's unique environment. Our State is widely recognised as having unique and special flora and fauna species, which can be impacted by our operations. Our road network also transects sensitive and protected environmental areas. Details of these areas and threatened species is available on our [website](#).



We use the precautionary principle in our approach to environment and heritage and aim to avoid and minimise impacts wherever possible. The precautionary principle is built into our internal processes and Western Australian environmental legislation.

We manage our operations using a systematic approach in which all our activities are screened for potential environmental impacts. Environmental impacts can include positive or negative changes to the values of our environment. Values impacted might be: physical, that is, land, water and air; biological meaning flora and fauna; cultural and heritage related Aboriginal and European values; and socio-economic and human-health values.

If potential impacts are negligible then the activity is implemented using standard management measures. If potential impacts are identified, the activities require further impact assessment.

We operate on a hierarchy of avoid, minimise, reduce and offset our environmental impacts. This is achieved primarily through changes in scope and design, and the development and implementation of an Environmental Management Plan (EMP) and an Offset Proposal.

Where the environmental impacts are likely to be significant we refer our projects to be assessed by the relevant regulators such as the Commonwealth Department of the Environment and Energy (DotEE), the Western Australian Environmental Protection Authority (EPA), or the Western Australian Department of Water and Environmental Regulation (DWER). The regulator will decide whether or not to assess the project. Where the regulator does not assess the project, it is implemented in accordance with the relevant EMP. Where the regulator assesses the project, it is subject to a comprehensive Environmental Impact Assessment and may be open to extensive public and community consultation. We do not implement those projects assessed by the regulators until they are approved, and the relevant approval conditions have been met.

We work closely with the Western Australian Department of Biodiversity, Conservation and Attractions to identify suitable environmental offsets and obtain approval. Offsets approved by DotEE can be identified in the project's approval conditions which are available on the DotEE website. Offsets that are approved by the EPA or DWER are advertised on the Government of Western Australia Environmental Offsets Register which is available on DWER's website.

For further information on our performance refer to the references in the Environment section of the GRI table.

Regional Presence & Development (Market Presence)

We operate across a vast and isolated State. Our rural operations can have significant impacts on regional towns' communities and their economies. In many instances, our regional presence presents the opportunity to positively impact indigenous communities as a higher proportion of our regional population is indigenous compared to in the metropolitan area. Increasingly our project funding conditions include stringent indigenous employment targets and requirements.

The regional towns in which are operations are located have comparatively low populations and therefore smaller economies. Our business activities can contribute to the economic activity of any of our regions but the impacts are more significant in our regional locations. Fly in, Fly out operations across all industries continues to be a key trend impacting regional towns and makes our continued commitment to regionally based services all the more important.

For key facts and figures relating to the level of service and investment in our regional areas please refer to our [Regional Digest](#).

For further information on our performance refer to the references in the [Market Presence section](#) of the GRI table.

Compliance with Environmental Legislation

Main Roads activities may be subject to both State and Federal Environmental Legislation. In some circumstances our projects depend upon being granted environmental approvals to proceed. We may face penalties, reputational damage or lose stakeholder and community confidence if we do not comply with our stringent environmental obligations.

For further information on our performance refer to the references in the [Compliance section](#) of the GRI table.

Local Communities

We understand major infrastructure projects can create significant change and disruption, with issues such as land acquisition, environmental impacts and construction traffic affecting our reputation and performance as a good neighbour. Whilst it's not always possible to achieve universal satisfaction we work closely with our stakeholders and the community, to reach mutually-beneficial outcomes wherever possible, based on the established principles of openness, transparency and proactivity.



A major impact of delivering State significant infrastructure is we sometimes need land which is already utilised for other purposes such as residential property. Land is acquired by negotiation or formal taking action under the powers contained in the Land Administration Act 1997. Land required is previously identified within the Metropolitan Region Scheme or a Planning Control Area.

The process of acquiring land can have significant community and social impacts which need to be managed. Main Roads will initiate land purchases by voluntary negotiations when funding is available. In some cases, where construction is imminent, acquisition may take place by formal taking action. Property owners are entitled to compensation and have the power to object to the Minister of Transport. Generally land is acquired two years prior to construction.

Our team of communications specialists works closely with Project Directors, Directorates, regional offices and stakeholder engagement groups to develop and deliver consistent, valuable and centralised communication on projects, works and events in our road network. In addition we design and manage the construction of projects to minimise direct and indirect disruption within our local communities.

For further information on our performance refer to the references in the [Local Communities section](#) of the GRI table.

Climate Change and Carbon Emissions.

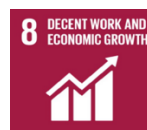
Current models for climate change predictions have the world on track for between a 2-4 degree change in global temperatures by 2070. It is anticipated that a 1 m sea level rise would result from a 4 degree increase in global temperatures. There are implications directly for our assets and the customers or communities we serve. We face four key physical climate change risks:

- Generally higher temperatures, more rainfall in the north and less rainfall in the south;
- Increases in the frequency, duration and magnitude of extreme heatwaves;
- Increased intensity of storms; and
- Sea level rise.

Risks to our business include:

- Decreased network reliability (i.e. travel delays)
- Increased occurrence of physical damage to our assets
- Redundancy of assets due to Sea Level rise

The development, operation and use of a road network consumes energy and generates emissions in numerous forms which is a contributing factor for climate change. The largest contributing factor for carbon emission generation is the use of the road network itself. Road transport makes up 15% of Australia's total emissions and has been the highest growing source of emissions since 1990 (BITRE 2015). We estimate that the road network generates



carbon emissions of a rate of 295.6 t CO₂ per million vehicle kilometres travelled (MKVT). In 2016-17 MVKT was 29,434 and thus emissions were approximately 8.7M t CO_{2-e} from use of the road network.

For further information on our performance refer to the references in the [Economic Performance](#) and [Energy section](#) of the GRI table.

Project Communications and Public Trust (Marketing and Labelling)

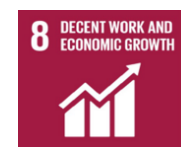
Our engagement approach in delivering infrastructure projects is determined by the community's level of influence over a project, with early, interactive and face-to-face engagement generally favoured to ensure community input is used to shape key decisions at the earlier stages of planning. As a project progresses through development and into construction, our engagement programs evolve with the focus on ensuring communities are well informed about the nature of our work and the measures we have in place to manage the impacts of construction. Engaging at an earlier point within the project lifecycle enables us to integrate natural opportunities for regular evaluation following each phase of community input. Structured evaluations of our strategies are included at the end of the Planning, Development and Procurement stages of the project lifecycle, and again at six-monthly intervals during the construction period.



For further information on our performance refer to the references in the [Marketing and Labelling section](#) of the GRI table.

Indigenous Heritage and Native Title

We acknowledge the traditional custodians of Western Australia's lands and aim to protect Aboriginal cultural values wherever possible. We recognise that there is an unacceptable level of disadvantage in living standards, life expectancy, education, health and employment experienced by Aboriginal peoples. We are committed to making a change in our industry and progressing reconciliation and we are increasing being ask to take the lead in our regional areas and contribute to increasing the level of aboriginal employment as a result of our contracts.



Our Reconciliation Action Plan 2017-19 is driven by our Diversity Working Group and focuses on:

- building even stronger relationships with Aboriginal people and communities
- creating greater understanding for ourselves and our partners of Aboriginal heritage and cultures providing opportunities for Aboriginal people through our activities and our industry.



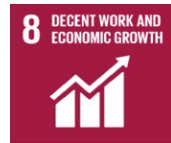
For further information on our performance refer to the references in the [Rights of Indigenous Peoples section](#) of the GRI table.

Procurement Practices

We rely on our supply chain to deliver tasks critical to our overall success. We engage with a large number of suppliers of varying characteristics. In 2017-18 we engaged directly with over 4,500 suppliers and made in the order of \$1.962 billion in payments. We are aware that our terms of payment can impact the cash flow and solvency of various businesses and seek to minimise those impacts. We also leverage our relationship with our suppliers to deliver priority government policy which includes training, indigenous engagement and supporting local business.

The State Supply Commission Policy on sustainable procurement requires us to demonstrate that we have considered sustainability in our procurement of goods and services. We have gone beyond the requirements of this policy to reflect this in not only our processes for procuring goods and services but also in procuring works. We apply the Western Australian Government's Buy Local Policy where we consider and give preference to local providers in our purchases as the benefits to industry development and employment are recognised. Buy Local Policy clauses are also included in all our tender documents and tender assessments. In addition we promote social procurement initiatives such as: direct purchasing from Aboriginal Businesses; using WA Disability Enterprises to provide works, goods and services; and giving recognition to our contractors who employ Aboriginal people and businesses. In 2018 we introduced contractual requirements for Contractors to employ Aboriginal People and subcontract to Aboriginal Businesses. This includes mandating minimum employment and subcontracting percentages that must be met in the delivery of works.

For further information on our performance refer to the references in the [Procurement Practices section](#) of the GRI table.



General Disclosures

Disclosure	Response or Reference within content	External Assurance	GRI Link
Organizational profile			
102-1 Name of the organization	Main Roads Western Australia	No	p. 7
102-2 Activities, brands, products, and services	About Us: Extent of operations	No	p. 7
102-3 Location of headquarters	About Us, Contact Information	No	p. 7
102-4 Location of operations	About Us, Website Link - Regional Offices, Project Sites, Facts and Figures	No	p. 8
102-5 Ownership and legal form	About Us, Enabling Legislation	No	p. 8
102-6 Markets served	About Us, Extent of Operations	No	p. 8
102-7 Scale of the organization	About Us, Our People: Our Profile	No	p. 8
102-8 Information on employees and other workers	Our People: Our Profile, About Us: Extent of Operations	No	p. 9
102-9 Supply chain	About Us: Extent of operations	No	p. 10
102-10 Significant changes to the organization and its supply chain	Achieving Government Goals: Changes since last report	No	p. 11
102-11 Precautionary Principle or approach	Environment: Environment Management	No	p. 12
102-12 External initiatives	Governance: Our Governance Model, Integrated Management System; Managing the Environment: Environmental Management System; Road Management: Road Safety	No	p. 13
102-13 Membership of associations	Website Link - Sustainability: Behaviour ARRB Group; Austroads Ltd Board; CEEID CEO Group; National Engineers Registration Board; PATREC Board; ROADS foundation board; World Road Association (PIARC) Council; UWA Engineering Foundation Advisory Board; Transport Certification Australia Ltd Board; Roadside Conservation Committee; Infrastructure Sustainability Council of Australia; Australian Asphalt Pavement Association; Engineers Australia; IPWEA	No	p. 13
Strategy			

102-14 Statement from senior decision-maker	Managing Directors Review	No	p. 14
102-15 Key impacts, risks, and opportunities	What is Driving Us ; Our Sustainable Approach: Addressing our Most Material Issues ; Risk Management	No	p. 15
Ethics and integrity			
102-16 Values, principles, standards, and norms of behaviour	Website Link - Code of Conduct, Keeping WA Moving Our Business Model ; Additional Governance Disclosures: Conduct and Ethics	No	p. 16
102-17 Mechanisms for advice and concerns about ethics	Additional Governance Disclosures: Integrity Framework, Corruption Prevention, Conduct and Ethics	No	p. 17
Governance			
102-18 Governance structure	Our Governance Model , Governing Bodies , Executive Committees ; Our Structure	No	p. 18
102-19 Delegating authority	Governing Bodies: Corporate Executive, Executive Committees ; Additional Governance Disclosures: Delegation of Authority	No	p. 18
102-20 Executive-level responsibility for economic, environmental, and social topics	Governing Bodies: Corporate Executive, Executive Committees ;	No	p. 19
102-21 Consulting stakeholders on economic, environmental, and social topics	Improving Customer Experience	No	p. 19
102-22 Composition of the highest governance body and its committees	Our Leaders ; Governing Bodies: Executive Committees	No	p. 19
102-23 Chair of the highest governance body	Governing Bodies: Corporate Executive	No	p. 20
102-25 Conflicts of interest	Conflicts of Interest	No	p. 21
102-26 Role of highest governance body in setting purpose, values, and strategy	Our Governance Model , Governing Bodies , Executive Committees ; Our Business Model	No	p. 21
102-27 Collective knowledge of highest governance body	Governing Bodies: Corporate Executive ; Our Sustainable Approach and Defining Materiality	No	p. 21

102-31 Review of economic, environmental, and social topics	Our Sustainable Approach and Defining Materiality	No	p. 23
102-32 Highest governance body's role in sustainability reporting	Our Sustainable Approach and Defining Materiality	No	p. 23
Stakeholder engagement			
102-40 List of stakeholder groups	Welcome: Reporting Journey; Improving Customer Experience, Website Link - Your Customer Needs	No	p. 29
102-41 Collective bargaining agreements	99.98%	No	p. 30
102-42 Identifying and selecting stakeholders	Welcome: Reporting Journey; Improving Customer Experience	No	p. 31
102-43 Approach to stakeholder engagement	Improving Customer Experience	No	p. 31
102-44 Key topics and concerns raised	Improving Customer Experience	No	p. 32
Reporting practice			
102-45 Entities included in the consolidated financial statements	Financial Statements	Yes	p. 33
102-46 Defining report content and topic Boundaries	Our Sustainable Approach and Defining Materiality	No	p. 34
102-47 List of material topics	Our Sustainable Approach and Defining Materiality	No	p. 35
102-48 Restatements of information	Nothing material	No	p. 35
102-49 Changes in reporting	Nothing material	No	p. 36
102-50 Reporting period	Welcome	No	p. 36
102-51 Date of most recent report	Welcome	No	p. 36
102-52 Reporting cycle	Welcome	No	p. 37
102-53 Contact point for questions regarding the report	Welcome: Comments and Feedback; Contact Information	No	p. 37

102-54 Claims of reporting in accordance with the GRI Standards	Welcome: Reporting Journey	No	p. 37
102-55 GRI content index	Website Link	No	pp. 38-39
102-56 External assurance	Performance and Financials	Yes	pp. 41-42

GRI Standard	Disclosure	Reference and Link	Omission			External Assurance	GRI Link
			Part Omitted	Reason	Explanation		
Material Topics							
GRI 200 Economic Standard Series							
Economic Performance							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Supplement, Addressing our Most Important Material Issues	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Governance and Managing Risk; Performance Measures; Financial and Other Disclosures	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Achieving Government Goals; Performance Measures	No identified omissions			No	p. 11
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Financial Statements	No identified omissions			Yes	pp. 6-8
	201-2 Financial implications and other risks and opportunities due to climate change	Managing the Environment: Climate Change	The information is currently unavailable	Climate change risk or impact not specified No cost of actions to mitigate risk	The cost of actions to mitigate risk is often an absorbed project cost and it is prohibitive to differentiate from regular	No	pp. 9-10

					project upgrade costs		
	201-3 Defined benefit plan obligations and other retirement plans	Financial Statements	No identified omissions			Yes	p. 11
	201-4 Financial assistance received from government	Financial Statements	No identified omissions			Yes	p. 12
Market Presence							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Supplement, About Us , Addressing our Most Important Material Issues: Local Communities, Regional Presence and Development , Website link - Our Regions	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Sustainability Supplement	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Our Regions , Achieving Government Goals	No identified omissions			No	p. 11
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	To be eligible for permanent appointment to the Western Australia public sector it is essential that applicants are an Australian citizen or have permanent resident status in Australia.	The Standard Disclosure or part of the Standard Disclosure is not applicable	Not expressed as a percentage	It not policy to hire applicants who are not permanent residents	No	p. 8
Indirect Economic Impacts							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Supplement, About Us , Addressing our Most Important Material Issues , Website link - About Us , Traffic Congestion Management Program	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Achieving Government Goals ; Performance Measures ; Financial and Other Disclosures	No identified omissions			No	pp. 8-10

	103-3 Evaluation of the management approach	Achieving Government Goals; Performance Measures	No identified omissions			No	p. 11
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Achieving Government Goals; Website link - facts and figures	No identified omissions			No	p. 6
Procurement Practices							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Addressing our Most Important Material Issues; Financial and Other Disclosures	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Financial and Other Disclosures, Website Link - Contracting to Main Roads	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Financial and Other Disclosures	No identified omissions			No	p. 11
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Sustainable Procurement and Buy Local	No identified omissions			No	p. 7
Anti-corruption							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Additional Governance Disclosures	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Additional Governance Disclosures	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Additional Governance Disclosures	No identified omissions			No	p. 11
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Additional Governance Disclosures Main Roads is continuing to assess all business units to identify and rate fraud and corruption risks	No identified omissions			No	p. 7

	205-2 Communication and training about anti-corruption policies and procedures	Additional Governance Disclosures All metropolitan and regional offices have received presentations on anticorruption policies and procedure	No identified omissions			No	p. 8
	205-3 Confirmed incidents of corruption and actions taken		No identified omissions				p. 9
GRI 300 Environmental Standards Series							
Materials							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Managing the Environment: Materials for Road Building	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Managing the Environment: Approach to Minimising our Impacts	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Managing the Environment: How we stay on track and accountable	No identified omissions			No	p. 11
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Managing the Environment: Materials for Road Building	No identified omissions			No	p. 6
	301-2 Recycled input materials used	Managing the Environment: Materials for Road Building	No identified omissions			No	p. 7
	301-3 Reclaimed products and their packaging materials	Managing the Environment: Materials for Road Building	No identified omissions			No	p. 8
Energy							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Emissions and Energy, Sustainability Supplement, Website Link - Environmental Footprint	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Carbon Reduction Plan, Road Efficiency, Community Access	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Emissions and Energy, Sustainability Assessment in Projects and Operations	No identified omissions			No	p. 11

GRI 302: Energy 2016	302-1 Energy consumption within the organization	Emissions and Energy	No identified omissions			No	pp. 6-7
	302-2 Energy consumption outside of the organization	Emissions and Energy	No identified omissions			No	pp. 8-9
	302-3 Energy intensity	Emissions and Energy	No identified omissions			No	p. 10
	302-4 Reduction of energy consumption	Emissions and Energy	No identified omissions			No	p. 11
	302-5 Reductions in energy requirements of products and services	Emissions and Energy, Sustainability Assessment in Projects and Operations	No identified omissions			No	p. 12
Water							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Sustainability Supplement, Website Link - Environmental Footprint	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Sustainability Supplement, Website Link - Environmental Footprint	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Sustainability Supplement, Website Link - Environmental Footprint	No identified omissions			No	p. 11
GRI 303: Water 2016	303-1 Water withdrawal by source	Sustainability Supplement, Website Link - Environmental Footprint	No identified omissions			No	p. 6
	303-3 Water recycled and reused	Sustainability Supplement, Website Link - Environmental Footprint	No identified omissions				p. 8
Biodiversity							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Managing the Environment: Our Unique Environment	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Managing the Environment: Approach to Minimising our Impacts, Website Link - Environmental Management at Main Roads	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Managing the Environment: How we stay on track and accountable	No identified omissions			No	p. 11

GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Managing the Environment: Our Unique Environment , Website - Projects website, Project Sustainability Reports	No identified omissions			No	p. 7
	304-2 Significant impacts of activities, products, and services on biodiversity	Managing the Environment: Our Unique Environment , Website - Projects website, Project Sustainability Reports	No identified omissions			No	p. 8
	304-3 Habitats protected or restored	Managing the Environment: Our Unique Environment	No identified omissions			No	p. 9
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Managing the Environment: Our Unique Environment	No identified omissions			No	p. 10
Emissions							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Emissions and Energy , Sustainability Supplement, Website Link - Environmental Footprint	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Carbon Reduction Plan , Road Efficiency , Community Access	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Emissions and Energy , Sustainability Assessment in Projects and Operations	No identified omissions			No	p. 11
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Emissions and Energy	No identified omissions			No	pp. 7-8
	305-2 Energy indirect (Scope 2) GHG emissions	Emissions and Energy	No identified omissions			No	pp. 9-10
	305-3 Other indirect (Scope 3) GHG emissions	Emissions and Energy , Sustainability Assessment in Projects and Operations	No identified omissions			No	pp. 11-12

	305-4 GHG emissions intensity	Emissions and Energy	No identified omissions			No	p. 13
	305-5 Reduction of GHG emissions	Emissions and Energy	No identified omissions			No	p. 14
Effluents and Waste							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Managing the Environment : Management of Environmental Incidents, Materials for Road Building, Waste Management: Roadsides, Buildings and Facilities	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Managing the Environment : Management of Environmental Incidents, Materials for Road Building, Waste Management: Roadsides, Buildings and Facilities	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Managing the Environment : Management of Environmental Incidents, Materials for Road Building, Waste Management: Roadsides, Buildings and Facilities	No identified omissions			No	p. 11
GRI 306: Effluents and Waste 2016	306-2 Waste by type and disposal method	Managing the Environment : Materials for Road Building	No identified omissions			No	p. 7-8
	306-3 Significant spills	Managing the Environment : Management of Environmental Incidents	No identified omissions			No	p. 9
Environmental Compliance							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Managing the Environment , Website Link - Environment and Heritage	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Managing the Environment	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Managing the Environment	No identified omissions			No	p. 11
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	Managing the Environment : Management of Environmental Incidents	No identified omissions			No	p. 6

Supplier Environmental Assessment								
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Managing the Environment, Our Value Chain, Extent of Operations	No identified omissions			No		pp. 6-7
	103-2 The management approach and its components	Managing the Environment, Website Link - Prequalification Process	No identified omissions			No		pp. 8-10
	103-3 Evaluation of the management approach	Managing the Environment: How We Stay On Track and Accountable	No identified omissions			No		p. 11
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	Managing the Environment: Management of Environmental Incidents	No identified omissions			No		p. 8
GRI 400 Social Standards Series								
Employment								
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Workforce, Addressing our Most Important Material Issues: Regional Presence and Development, Our People	No identified omissions			No		pp. 6-7
	103-2 The management approach and its components	Our People	No identified omissions			No		pp. 8-10
	103-3 Evaluation of the management approach	Our People: Key Performance Indicators, Our Profile	No identified omissions			No		p. 11
GRI 401: Employment 2016	401-1 New employee hires and employee turnover		The information is currently unavailable	Alternate indicator reported	Our system are only able to report against this indicator in this manner	No		p. 7
	401-3 Parental leave	Website link - Benefits	The information is currently unavailable	Return to work rates Number of people accessing	System to capture people accessing parental leave, and	No		p. 9

				parental leave	return to work rates is under development		
Labour/Management Relations							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<u>Our People</u> : Sustaining our Workforce, Career Conversations After a successful negotiation process Main Roads registered three Enterprise Bargaining Agreements (AWU, APEA, CSA) with the WA Industrial Relations Commission that expired in February 2018. The agreements reflect our business requirements while recognising the needs of our employees.	No identified omissions			No	<u>pp. 6-7</u>
	103-2 The management approach and its components	<u>Our People</u> : Sustaining our Workforce, Career Conversations	No identified omissions			No	<u>pp. 8-10</u>
	103-3 Evaluation of the management approach	<u>Our People</u> : Sustaining our Workforce, Career Conversations	No identified omissions			No	<u>p. 11</u>

GRI 402: Labour / Management Relations 2016	402-1 Minimum notice periods regarding operational changes	All Main Roads industrial instruments provide for consultation mechanisms and notification of change requirements. During the last year Main Roads has undergone significant organisational change. These changes have been managed in accordance with the notification of change requirements. All agreements provide for the establishment of a Joint Consultative Committee which is the conduit for regular consultation. Updates of the status of organisational change are provided as a specific agenda item at these meetings. Updates of the status of organisational change are provided as a specific agenda item at these meetings. The agreements do not provide a specific period for notice. However, we notify employees and the unions as soon as practicable of any changes. Typically, between eight to 20 weeks' notice is given.	No identified omissions			No	p. 6
Occupational Health and Safety							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Enhancing Safety, Health and Wellbeing: Safety Context, Safety at Project Sites	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Enhancing Safety, Health and Wellbeing: Safety, Health and Wellbeing Framework	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Enhancing Safety, Health and Wellbeing: Key Performance Indicators	No identified omissions			No	p. 11

GRI 403: Occupational Health and Safety 2016	403-1 Workers representation in formal joint management-worker health and safety committees	<u>Governing Bodies</u> : Corporate Safety Health and Wellbeing Committee 100% of the organisation and integrated business partners (ISP's) are formally represented by SHW Committees.	No identified omissions			No	p. 7
	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	<u>Enhancing Safety, Health and Wellbeing</u> : Key Performance Indicators	The information is currently unavailable	Current system does not capture LTFR of entire workforce	Current system and reporting does not capture this information	No	pp. 8-9
Training and Education							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	<u>Our People</u> : Our Profile, Sustaining our Workforce	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	<u>Our People</u> : Developing our Employees, Website Link - Learning and Development	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	<u>Our People</u> : Key Performance Indicators, Developing our Employees ; Financial and Other Disclosures : Government Building Training Policy	No identified omissions			No	p. 11
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	<u>Our People</u> : Key Performance Indicators, Developing our Employees ; Financial and Other Disclosures : Government Building Training Policy , Website Link - Learning and Development , Road Management: Road Safety Audit Online	No identified omissions			No	p. 8
	404-3 Percentage of employees receiving regular performance and career development reviews	<u>Our People</u> : Key Performance Indicators	No identified omissions				p. 9

Diversity and Equal Opportunity							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our People Promoting Diversity and Equal Opportunity , Website Link - Diversity	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Our People: Promoting Diversity and Equal Opportunity , Website Link - Diversity	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Our People: Key Performance Indicators , Women in Leadership , Aboriginal Employment	No identified omissions			No	p. 11
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Our Workforce , Our Leaders	No identified omissions			No	p. 6
Non-discrimination							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our People Promoting Diversity and Equal Opportunity , Website Link - Diversity , Pedestrians and Cyclists	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Our People Promoting Diversity and Equal Opportunity , Website Link - Diversity , Pedestrians and Cyclists	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Our People: Key Performance Indicators ; Community Access: Key Performance Indicators , Improving Customer Experience: Community Perception Survey	No identified omissions			No	p. 11
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	No incidents of discrimination	No identified omissions			No	p. 6

Freedom of Association and Collective Bargaining							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our employees are covered by enterprise bargaining agreements between the Commissioner of Main Roads and each of the unions. The process of negotiation and registration provides opportunities for key stakeholders to provide input into the provisions of the agreements. In particular recognising the needs of employees and Main Roads' business. All employees are free to join unions and we recognise the integral role of unions in the agreement making process.	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	As above	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach		No identified omissions			No	p. 11
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	We allow freedom and association on all our sites and operations	No identified omissions			No	p. 6
Rights of Indigenous Peoples							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Addressing our Most Important Material Issues , Website Link - Action Plans , Heritage	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Our People : Reconciliation Action Plan, Aboriginal Employment; Managing the Environment : Management of Aboriginal Heritage Sites in Road Projects, Website Link - Action Plans , Heritage	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Our People : Reconciliation Action Plan, Aboriginal Employment; Managing the	No identified omissions			No	p. 11

		Environment: Management of Aboriginal Heritage Sites in Road Projects, Website Link - Action Plans, Heritage					
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	Managing the Environment: Management of Aboriginal Heritage Sites in Road Projects	No identified omissions			No	p. 7
Local Communities							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Addressing our Most Important Material Issues; Improving Customer Experience: Engaging with Local Communities	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Improving Customer Experience: Engaging with Local Communities	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Improving Customer Experience: Key Performance Indicators, Community Perception Survey	No identified omissions			No	p. 11
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Improving Customer Experience: Engaging with Local Communities, Projects	No identified omissions			No	pp. 7-8
	413-2 Operations with significant actual and potential negative impacts on local communities	Interactive Map, Website Link - Projects	No identified omissions			No	pp. 9-10
Supplier Social Assessment							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Improving Customer Experience: Engaging with Local Communities, Enhancing Safety, Health and Wellbeing: Safety at Project Sites, Sustainable Procurement and Buy Local, Website Link - Prequalification	No identified omissions			No	pp. 6-7

	103-2 The management approach and its components	Improving Customer Experience: Engaging with Local Communities, Enhancing Safety, Health and Wellbeing: Safety at Project Sites, Sustainable Procurement and Buy Local, Website Link - Prequalification	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Improving Customer Experience: Engaging with Local Communities, Enhancing Safety, Health and Wellbeing: Safety at Project Sites, Sustainable Procurement and Buy Local, Website Link - Prequalification	No identified omissions			No	p. 11
GRI 414: Supplier Social Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	Improving Customer Experience: Engaging with Local Communities, Enhancing Safety, Health and Wellbeing: Safety at Project Sites, Sustainable Procurement and Buy Local, Website Link - Prequalification	No identified omissions			No	p. 8
Public Policy							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Addressing our Most Important Material Issues	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Governance	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Overall Performance	No identified omissions			No	p. 11
GRI 415: Public Policy 2016	415-1 Political contributions	Not Applicable	No identified omissions			No	p. 6
Customer Health and Safety							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Addressing our Most Important Material Issues: Road Safety, Road Management: Road Safety, Website Link - Road Safety	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Road Management: Road Safety, Road Safety, Website Link - Management System, Policy & Guidelines, Safe System Approach	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Road Safety: Key Performance Indicators	No identified omissions			No	p. 11

GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	Road Management: Road Safety, Website link - Crash Investigation, Road Safety Auditing, Management System	No identified omissions			No	p. 7
Marketing and Labelling							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Improving Customer Experience: Open and Transparent Communication, Website Link - <u>Our Commitments to You</u>	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Improving Customer Experience	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Improving Customer Experience	No identified omissions			No	p. 11
GRI 417: Marketing and Labelling 2016	417-1 Requirements for product and service information and Labelling	Website Link - Our Commitments to You	No identified omissions			No	p. 6
Customer Privacy							
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Additional Governance Disclosures: Customer Privacy: Website Link - <u>Privacy</u>	No identified omissions			No	pp. 6-7
	103-2 The management approach and its components	Additional Governance Disclosures: Customer Privacy: Website Link - <u>Privacy</u>	No identified omissions			No	pp. 8-10
	103-3 Evaluation of the management approach	Additional Governance Disclosures: Customer Privacy	No identified omissions			No	p. 11
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	No complaints	No identified omissions			No	p. 6