



# CHARTING

# THE COURSE

Positioned at the crossroads of global connectivity, SAGT is advancing global trade while pioneering a sustainable future. As the first Public Private Partnership Container Terminal in Sri Lanka we have propelled the Port of Colombo as a global transshipment hub.

Over a legacy of 26 years, sustainability has remained at the core of our operations and is embedded across the organisation through a Sustainability Management Framework. SAGT leads in the Port of Colombo and the region in terminal decarbonisation, digitisation and automation and fostering gender diversity.

Our employees are the driving force of our operations and are committed to delivering service excellence to our customers.

While we have set the benchmark for terminal productivity, the Company remains committed to transforming the Port of Colombo into a green transshipment hub for the region.



# **CONTENTS**



**ABOUT THIS REPORT** 



CEO'S **MESSAGE** 



**ABOUT SAGT** 



**KEY HIGHLIGHTS DURING THE YEAR** 



# **CORPORATE GOVERNANCE**

Corporate Governance	18
Risk Management Strategy	22
Sustainability Integration	27

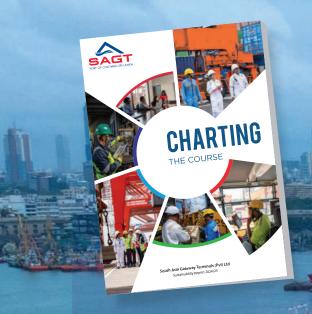


# **SUSTAINABILITY PERFORMANCE**

Operational Review40	0
Environmental Stewardship4	2
Labour Practices and Social Responsibility5	4
Independent Assurance Statement7	71
GRI Content Index79	6



# **ABOUT THIS REPORT**



This Sustainability Report published by South **Asia Gateway Terminals** (PVT) Ltd. (SAGT) marks the Company's sixth consecutive report, in its 26th year of operations and reaffirms its commitment to sustainability. Published in June 2025, it contains information pertaining to SAGT's progress in Sustainability, for the period 1st April 2024 to 31st March 2025. Its comparative performance of previous years, highlights the Company's continued progress in key sustainability areas, focusing on three key pillars: Environmental Stewardship, Social Responsibility and Responsible Operations.

### REPORT SCOPE AND BOUNDARY:

South Asia Gateway Terminals (PVT) Ltd Annual Sustainability Report 24/25 has been reported in accordance with the GRI Standards for the period 1st April 2024 to 31st March 2025. All previous reports published thus far by SAGT have been in accordance with the GRI sustainability Reporting Standards of 2021 and the GRI Universal Standards, and amendments to GRI Topics Specific Standards (2018, 2019 and 2020). A full list of the disclosures referenced in this report can be found on pages 35-36.

SAGT is located in the Port of Colombo and operates within the container terminal sector. As such this report focuses exclusively on the operations of SAGT in the Port of Colombo. The Company reports on Environmental, Social and Governance topics that are deemed material to the organisation, based on their potential impacts on its significant stakeholders as well as the risks and opportunities of such impacts and dependencies on the business.

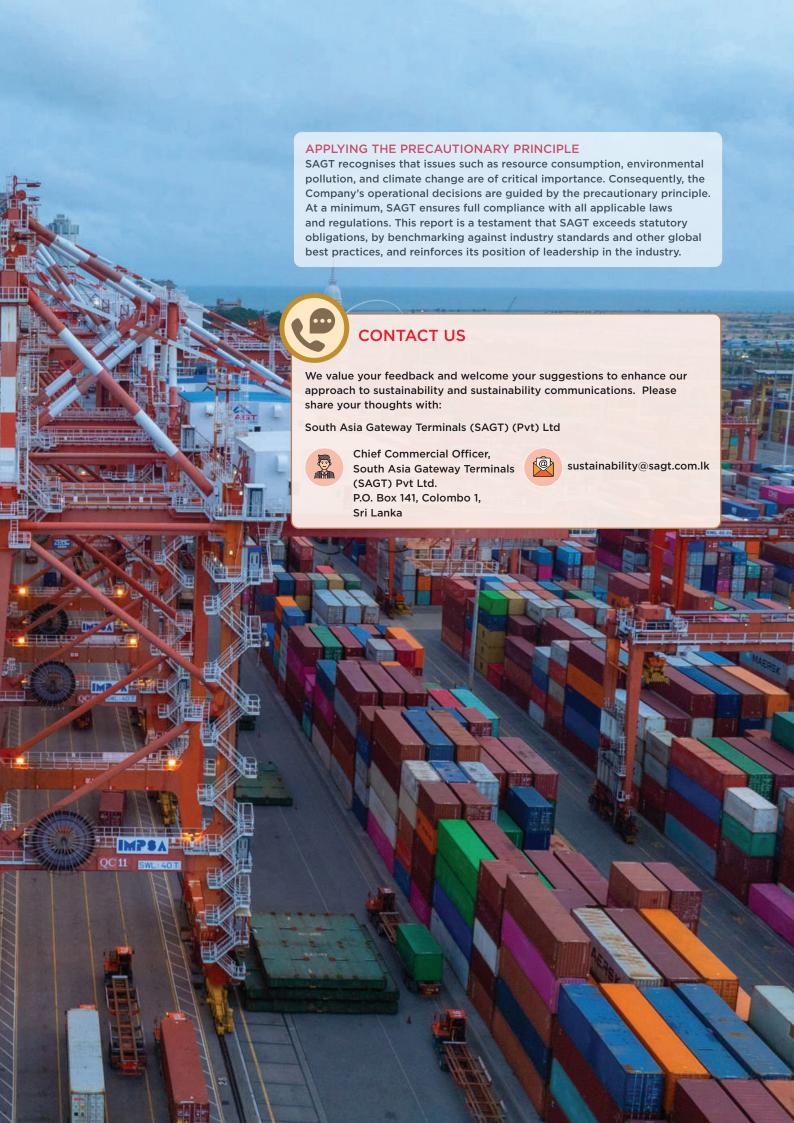
At SAGT, Sustainability is integrated into the day-to-day operations of the terminal through a comprehensive sustainability Management Framework (SMF). This framework includes stakeholder engagement, the identification of material topics, the robust sustainability strategy and management approaches to minimise negative impacts. Details of this integration are outlined in the "Sustainability Integration" section in pages 27-38 of this report. The report outlines the sustainability performance, strategies for improvement, and progress towards achieving preset goals throughout the year.

In addition, Corporate Governance and Enterprise Risk Management are critical elements that underpin SAGT's Sustainability Management Framework. This report provides a comprehensive overview of these areas.

### **ASSURANCE**

Whilst the information in this report has been reviewed internally by SAGT's senior management, the Company continues to adhere to its policy of undertaking external assurance for its annual Sustainability Reports. To this end, SAGT has obtained the services of DNV represented by DNV Business Assurance India (PVT) Ltd. to conduct an independent assurance based on AA1000AS – Type 2 moderate level. This assurance statement can be found on pages 71-75.

All methodologies, assumptions, indicators and estimations used in the compilation of this report follow the GRI standards and industry practices. Any restatements, along with underlying reasons are clearly stated in the relevant sections of this report.



# **CEO'S MESSAGE**



### Dear Stakeholder,

It is my pleasure to share with you the sixth Sustainability Report of South Asia Gateway Terminals (Pvt) Ltd (SAGT), now in our 26th year of operations. This report highlights the progress we have made on our sustainability journey during the financial year 2024/25. It also serves as a channel for communicating our policies, performance and best practices, encouraging external stakeholders to partner us in our efforts to advance sustainability within and beyond the boundaries of the terminal.

The Port of Colombo (PoC), operating as both, the primary transshipment hub in South Asia for container shipping and primary trade hub in Sri Lanka, can be considered a vital contributor to the country's economic progress. Since its inception in 1999, SAGT has set benchmarks for customer centric efficiency, productivity and reliability, thereby playing the primary role in propelling the PoC as a significant hub in the region.

Sri Lanka's fortuitous geographic positioning strategically astride the main east-west sea route, its global ranking among the Top 30 ports by volume and among the Top 10 by connectivity, further strengthen its positioning among other transshipment hubs in the region.

During the year, containerised trade saw an uptick due to increased volumes and ship traffic on the Asia-Europe trade lane in general and the PoC in particular, because of a majority of container shipping lines taking the longer sea-route to Europe via the Cape of Good Hope, against a Suez Canal transit, due to the Houthi led attacks on shipping in the Red Sea. The longer time taken resulted in more ships being deployed and more inventory in transit between production and consumption centres, thereby increasing overall container volumes. Additionally, India's growth and ever-expanding trade added further impetus to the growth in container volumes over Colombo.

In the 2024/25 financial year SAGT once again achieved a milestone 2 million TEUs against its design capacity of 1.1 million TEUs. This was previously achieved in 2018 and 2019 and marks the third time since inception that the Company has crossed this threshold. The achievement speaks volumes to the close attention that is paid to efficiency and productivity in which our customers are served and to the dedication of our employees and contractors towards providing them with a best-in-class service.

During the latter part of the reporting period, the first phase of the West Container Terminal (WCT) commenced operations, signifying the long overdue addition of much needed handling capacity to the Port of Colombo. Together with the added capacity from the East Container Terminal (ECT), when it does eventually begin operations, this expansion will contribute immensely to the long-term growth of the Port of Colombo by





increasing capacity and strengthening the Port's operational capability and value proposition as a regional transshipment hub.

# TOWARDS A FULLY INTEGRATED SUSTAINABILITY MODEL

Sustainability at SAGT continues to be guided by a comprehensive four pillared strategy.

Our Sustainability Management
Framework ensures that the
sustainability policies, principles
and practices are integrated at all
levels of SAGT's business operations,
were, guided by our commitment
to minimise harmful impacts on the
environment, we continually invest
in operating in a manner that aim to
reduce the consumption of fossil fuels,
electricity and groundwater whilst
minimising waste generation.

In line with this commitment, SAGT has continued to prioritise implementing energy-efficient technologies by investing in reducing electricity consumption from the grid through the use of rooftop solar energy, by closely intertwining peak operations demand with off-peak power periods whenever





Milestone 2 million TEUs achieved in 2024/25

possible and by replacing fossil fueldriven equipment with state-of-the-art, fuel saving hybrid technologies.

Our decarbonisation objectives are aimed at alignment with those of our key customers and the goals on the path to Net Zero that are promulgated by the International Maritime Organisation (IMO), to which Sri Lanka is a signatory and to which the PoC is bound to work to achieve. This aims to reduce the Carbon intensity of the Maritime industry by 40% in 2030, by 80% by 2040 and to achieve net zero emissions by 2050.

SAGTs carbon footprint of 18,469 MTCO<sub>2</sub>eq in 2024/25 was an increase of 19.5% compared to the previous year, mainly due to increased containers handled. The increased volume resulted in greater equipment utilisation, which in turn meant that SAGTs carbon intensity (kgCO<sub>2</sub>eq per box move) increased by a marginal 1% in 2024/25 compared to the previous year. Notwithstanding the year-on-year movement on carbon intensity, the Company achieved a 22% reduction in carbon intensity over the last six years, since the time we began measuring and reporting on emissions.

As has been reported previously, this reduction has been largely driven by the conversion of 22 Rubber Tyred Gantry Cranes (RTGs) from fully diesel powered to hybrid diesel-battery powered, during this period. Given the tangible improvement in operating efficiency and the substantial savings in diesel consumption and resultant reduction in emissions experienced with the converted machines, the Company invested in converting another six RTGs to hybrids during the year, thereby increasing the number of hybrid machines from 22 to 28.

During the year, the Company completed the installation of rooftop solar panels on our administration buildings. Once operational in the 2025/26 financial year, it is expected that rooftop solar on the premises will provide circa 3%-5% of our annual energy usage, thus positively contributing to our emissions saving through reduced off-take of electricity from the national grid. We are currently evaluating the feasibility of extending solar power generation to the rooftops of all gatehouses as the well, towards creating a concept of wholly renewable powered 'greengates', as a first of their kind in the Port of Colombo

In 2024/25 SAGT withdrew 52,488m3 of water which is a 26% reduction compared to 2023/24. This is largely attributable to identifying and fixing underground water leaks. The Company also continues to drive awareness campaigns for its staff and contractors on the importance of reducing freshwater usage in the washrooms and showers, where the largest consumption occurs. Further reduction in groundwater withdrawal is planned through investment in an Effluent Treatment Plant (ETP) that will enable reuse of treated effluent for selected terminal activities. The proposed ETP can generate approximately 60 cubic meters of treated clean water daily which is approximately 42% of the Company's current daily usage. The project is currently pending site approval and once obtained, is scheduled for implementation in FY 2025/26.

Moving beyond the boundaries of the terminal, the Company is also committed to restoring and protecting the natural environment and ecosystems that have a direct impact on the primary goal of decarbonisation. Towards this, SAGT

# **CEO'S MESSAGE**



has contributed to restoring 5 acres of the Yagirala Forest Reserve in the South of Sri Lanka in partnership with the Centre for Sustainability (CFS) of the University of Sri Jayewardenepura. Strengthening its partnership with CFS further, the Company kickstarted the restoration of five acres of the Benthara River Mangrove Complex in Iththapana. The three-year project once completed will have introduced 2,000 mangrove saplings contributing to carbon sequestration, restoring the ecosystem and providing means of income for the local community. The Company also continues to partner the Marine Environment Protection Authority (MEPA) for continued protection of the marine environment and prevent coastal pollution. Through these projects, SAGT places strong emphasis on raising awareness among its staff on the importance of environmental conservation and ecosystem restoration by providing staff volunteer opportunities. During the year, SAGT employees collectively contributed 756 hours to volunteering activities.

We continued to invest in enhancing the value of our people, particularly in the face of rapidly changing environments, driven by digitisation and automation. Reflecting the growing importance of training, the Company significantly increased its investments into training and development of our workforce during the year, resulting in a 42% increase in training hours compared to the previous year. Employee training included areas such as health and safety, leadership and technical skills development. This investment not only enhances the value we derive from our employees but also the value we create for them.

During the year, SAGT also began the journey to embrace LEAN principles to further strengthen our commitment to innovation, continuous improvement and employee driven process improvements. The initiative, implemented with the oversight and guidance from the APMT Global LEAN Academy, aims to give all staff a solid understanding of LEAN management principles, key tools, and practical problem-solving techniques using methodologies like KAIZEN and 5S.

Giving practical effect to our aspirations to prioritise the wellbeing of our staff at all levels, in 2024, SAGT became the first port sector organisation in Sri Lanka to introduce a paternity leave policy going well beyond statutory obligations. Many, new fathers who work in the Company have availed themselves of the offer of 21 days of fully paid paternity leave.

which is above the regular entitlement, with great appreciation.

Investing in future leaders, the Company continues to support the educational endeavours of its employees' children. During the period under review, the Company distributed 702 packs of school supplies to all employee's children. Moreover, 16 scholarships in the form of cash bursaries were provided to children who performed well in grade five scholarship exams and to students who gained entry into state universities.

Within the Social Responsibility pillar of our sustainability strategy, SAGT assisted the Iththapana District Hospital to uplift their facilities by providing essential items for improving conditions and facilities in the wards. A team from our engineering department visited the hospital and assisted with much needed repairs to the premises to improve conditions at the hospital.

Given the high-risk nature of operations, the safety and wellbeing of all stakeholders is a key priority to the Company and is embedded within our core values. To further improve the convenience of its safety processes, the Company successfully launched a phased implementation



Team SAGT Volunteering at the Iththapana Mangrove Complex Project Site

of a digital Safety Management System (SMS) which consolidates all safety related process into one digital platform.

The Company conducts annual, mandatory safety refresher training for all employees and contractors. In addition to this specialised safety trainings are provided to the members of the Emergency Response Team (ERT) and employees working in high-risk areas. Daily toolbox meetings are also held to educate and raise awareness amongst its workforce on the importance of adhering to safe workplace practices. The Company's Occupational Safety and Health (OSH) Committee which consists of a cross section of employees continues to work on creating a culture of safety within the workplace.

Despite this focus and attention on safety, an unfortunate accident on the premises during the fourth quarter of the reporting year, tragically resulted in a fatality. The deceased was a highly experienced technician employed by a third-party contractor who succumbed to his injuries in hospital following an accident on the terminal. This tragic and deeply regrettable incident underscored the necessity of inculcating a culture of a deep and personal commitment to safety at the level of every individual as the bedrock of a safe and secure workplace.

Our commitment to foster a diverse workforce particularly by expanding the participation, scope and opportunity for women in the company and industry as a whole, remains a cornerstone of our diversity initiatives.

The Company promptly initiated a thorough investigation, collaborating with external experts and the relevant government and statutory authorities to identify the root causes of the incident and thereafter worked with the deceased's employer to ensure that his immediate family was supported through this tragedy. Thereafter, a comprehensive audit of SAGT's safety policies, procedures, and practices was undertaken by the Regional Head of Safety at APM Terminals.

Beyond this, the company had seven recordable work-related incidents leading to a total of 72 lost workdays.

# Committed to a diverse, equitable and inclusive workplace

Our commitment to foster a diverse workforce particularly by expanding the participation, scope and opportunity for women in the company and industry as a whole, remains a cornerstone of our diversity initiatives. However, needlessly discriminatory labour laws and archaic and anachronistic Port regulations that prevent women from entering the Port premises after 6:00PM have hindered progress towards expanding equal career opportunities for women in the ports and shipping industry.

During the year under review, we adopted a more proactive approach and over several months, sought and obtained special approval to employ female executives into select shiftbased roles within the operations team. The approval was obtained following an inspection of the premises and facilities by the Labour Commissioner, consequent to which, SAGT employed twelve female graduates into shiftbased roles within the terminal industry in Sri Lanka for the first time. We are confident that this will pave the way for more such employment within all the terminals in the port of Colombo, thus breaking down long-standing barriers and creating meaningful pathways for women in the industry.

### Governance

SAGT continues to operate within a robust governance framework in line with global best-practices. The Board is comprised entirely of non-executive

directors, two of whom are women, and the Audit Committee directly oversees the internal audit functions.

The Board provides overall strategic direction to the CEO and the Management team and sets the tone at the top by promoting professional and ethical standards and corporate values that cascade down to senior management and other employees of the Company. The Employee Code of Conduct and the Supplier Code of Conduct are some of the governance policies through which the Company achieves its objectives. SAGT was a pioneering entity within the Port of Colombo to introduce a Whistleblowing policy and a policy against Sexual Harassment, while adhering to the precautionary principle with respect to operational and investment decisions. There were no changes to the Company's governance structure or processes during the year.

### LOOKING AHEAD:

Since inception in 1999, SAGT has continued to set benchmarks in the Port of Colombo in operational efficiency. We have also committed ourselves to be the standard-bearers in the Port of Colombo by leading the way in integrating sustainability into our business practices.

With the planned capacity expansion at the Port of Colombo, we remain optimistic about the long-term growth of the Port's throughput and its value proposition to stakeholders. The emergence of regional transshipment hubs, particularly in India, reflects the continued trade growth in South Asia which is complementary to Colombo's continued growth.

Volatile geopolitical dynamics continue to influence global trade flows. Although likely to be resolved sooner rather than later, the ongoing trade disputes among the world's major trading economies are likely to reshape global trade patterns introducing further complexities to supply chains. Within this context, an increasing strategic focus on the South Asian region is likely to boost intra-Asia trade and thereby bolster potential changes in the traditional east-west trade lanes.

# **CEO'S MESSAGE**

In this backdrop, SAGT will look to continuing to upgrade its operational capabilities by adding 4 new ship-toshore cranes with twin lift capabilities into its fleet in the coming years. Additionally, the year ahead, will see big strides in improving efficiency, productivity and overall governance through the realisation of substantial, planned investment in digitisation across the organisation in line with global best practices. Within SAGT, this will be through the implementation of digital and OCR (optical character recognition) technologies that will see the deployment of fully automated gates and partially automated quayside operations to automatically scan and detect container condition and information. Deployment of this leading, world class technology will remove several manual intensive processes at the gate and quayside and significantly enhance the safety, accuracy and efficiency of these operational processes. Beyond this and in active engagement with the Sri Lanka Ports Authority and the other terminals in the port, plans are well underway to introduce a digitised, integrated Vehicle Booking System (VBS) for all container trucks engaged in inter-terminal transfers, imports and exports. Once implemented, the system will improve efficiency and traceability whilst significantly enhancing productivity and saving costs for truck operators and their customers, by reducing truck turnaround times within the terminals and in the port as a whole.

### **ACKNOWLEDGEMENTS**

These have been and will undoubtedly remain challenging and exciting times and SAGT as a key component of Sri Lanka's vital gateway and trade infrastructure will do our part to lead from the front. This is only made possible because of several key stakeholders and people. I would like to record my heartfelt appreciation to our Customers for their continuing confidence in us, to the entire team at SAGT and all our contractor partners for their tireless efforts, passion and commitment, to the Board of Directors and my colleagues on the SMT for their wholehearted and constant support, to the Trade Unions represented in the Company for their responsible partnership, to our suppliers for their loyalty and inspiration. I also extend my gratitude to the Sri Lanka Ports Authority, other Government agencies, stakeholders, and the wider community for their unstinted support.

Romesh David

Chief Executive Officer



# **ABOUT SAGT**



# **OUR VISION**

TO BE THE MOST TRUSTED
GATEWAY IN THE INDIAN
OCEAN



# **OUR PURPOSE**

EMPOWERING SRI LANKA'S HUB ASPIRATIONS



# **OUR MISSION**

- TO ENSURE THE SAFE TURNAROUND OF SHIPS WITHIN AN OPTIMAL TIME, OPERATING 24X7, 365 DAYS A YEAR.
- TO EMPOWER EMPLOYEES BY PROVIDING
   AN EXEMPLARY WORK ENVIRONMENT
   EVERY DAY WHILST FOSTERING
   SUSTAINABLE AND ACCOUNTABLE GROWTH
   AS A UNIFIED TEAM.
- TO CONTINUOUSLY ADOPT BEST PRACTICES AND TECHNOLOGIES ACROSS THE BUSINESS.

Situated on the main East-West shipping route, the Port of Colombo (PoC) offers easy access to the Bay of Bengal region, including India, Bangladesh, Pakistan, and the Maldives, serving as a leading transshipment hub in South Asia. SAGT is one of four container terminals within PoC offering seamless connectivity with the Port's new deep-draft basin. Therefore, SAGT is strategically positioned to offer integrated port solutions and has played a vital role in enhancing the capacity of PoC.

SAGT holds the distinction of being the largest private sector investment in Sri Lanka at the time of inception, and the nation's first public-private partnership container terminal with a majority local shareholders.

# **OUR VALUES**

THE COMPANY'S FOUNDING PRINCIPLES ARE
REPRESENTED THROUGH FIVE CORE VALUES, WHICH
IN TURN GUIDE SAGT'S VISION AND ARE EMBEDDED
ACROSS THE ORGANISATION'S MISSION, PURPOSE,
CODE OF CONDUCT AND ITS OTHER POLICIES:



**SAFETY** 



TRUST & INTEGRITY



**EXCELLENCE** 



**TEAM WORK** 





### RESPONSIBILITY, ETHICS AND INTEGRITY:

OWNERSHIP STRUCTURE

SAGT continues to uphold its role as a responsible corporate citizen, striving for operational excellence and delivering exceptional service across the organisation. This commitment extends to its stakeholders and value chain, with a focus on environmental stewardship, social responsibility and strong corporate governance. By prioritising these principles SAGT positively impacts its main stakeholder groups including businesses and local economies.

The Company enacts responsible and ethical business practices through a range of policies and standards including its Code of Business Conduct and Ethics, Supplier Code of Conduct, Environmental policies, and various sustainability and employee related policies which include the Health & Safety, Whistleblower policy and policy against sexual harassment and discrimination and other environmental related policies.

### **SOUTH ASIA GATEWAY TERMINALS** 16m · 30-year BOT investment 940m 15m 540 **ACCESS COMMENCED** · First Public Private **QUAY ALONGSIDE** REEFER **CHANNEL** Partnership (PPP) LENGTH DEPTH **POINTS** 1999 LENGTH operator in the Ports & Shipping sector 10 31 80 QUAY PRIME **RUBBER TYRED CRANES GANTRY CRANES MOVERS SHAREHOLDER**

30

INTER TERMINAL

2

SAFETY CAGES FOR



# **KEYHIGHLIGHTS DURING THE YEAR**



# **GENDER EQUALITY**

A significant milestone was achieved with the approval to integrate female employees into select shift-based roles within the Operations Department. As of January 1, 2025, SAGT successfully onboarded 12 graduate females to work on a shift basis, marking a progressive step toward greater gender inclusion in operational functions.

This is part of SAGT's ongoing commitment to provide equal opportunity for women in the industry. In 2019, SAGT made history by hiring its first female engineer. Today, women are employed across all departments, continuing this progressive path.



### Decarbonisation

During the year SAGT continued to leverage energy efficient technology and electrification to decarbonise operations.

6 RTG cranes were retrofitted with hybrid technology bringing the total number of hybridised cranes from 22 to 28. Hybridisation of an additional 6 cranes can save over 250,000 liters of diesel based on fuel consumption for the reporting year.

SAGT invested in a rooftop solar panel array to increase reliance on renewable energy within its administration building. The 460kW on-grid solar system has the potential to generate 5% of the Company's annual electricity consumption.

# SAGT is committed towards restoring the natural environment driving green progress.

During the year SAGT commenced its mangrove restoration project in collaboration with the Centre for Sustainability of the University of Sri Jayewardenepura. While such reforestation events contribute towards the restoration of natural environments and ecosystems, they also contribute towards offsetting a portion of the terminals carbon footprint once the forests reach full maturity.

In March 2025, volunteers from Team SAGT visited the site and assisted with preparing the land area for planting.





# **SUSTAINABILITY HIGHLIGHTS**

		2023/2024	2024/2025	% Difference
Employees				
Total Employees		636	667	4.9%
Female Employee Ratio Total Workforce (including contr		4.4%	6.3%	43.0%
Total Workforce (including contr	ractor's personnel)	1,419	1,468	3.5%
New Hires  Total Attrition (No.s)		21	93	342.9%
Total Attrition (No.s)		37	42	13.5%
Attrition Rate %  Total Training Hours		5.8%	6.3%	8.2%
		19,848	28,098	41.6%
Average Training Hours		31.2	42.1	35.0%
		0	0	0.0%
Incidents of Discrimination Occupational Health and Safety	<i>(</i>			
Total Incidents of Occupational I	Injuries	3	7	133.3%
		0	1	0.0%
Fatalities High-Consequence Injuries  Proportion Injuries		0	0	0.0%
Recordable Injuries		3	6	100.0%
No. of Lost Days		23	72	213%

<sup>\*</sup>All Social and Governance indicators are reported for employees only, excluding the contractual workforce, except for GRI 403

\*Lost days reported include only SAGT permanent employees. Lost days for third-party contractors are not considered, as they fall outside SAGT's direct operational control.

	2023/2024	2024/2025	% Difference
Material Usage and Waste Management			
RTG Tyres in No.s	57	52	-8.8%
PM Tyres in No.s	477	579	21.4%
Lubricants in Litres	49,824	66,439	33.3%
Rope in Kgs	76,981	111,003	44.2%
A4 Paper and Letterheads (No.s of 500-Page Reams)	1,145	962	-16.0%
Waste Generated (Kg)	1,006,490	1,384,637	37.6%
Waste Recycled, Recovered, or Reused (kg)	981,130	1,351,204	37.7%
Total Waste Sent to Landfill (Kg)*	0	0	0.0%
Total Hazardous Waste (Kg)	64,423	86,805	34.7%
Total Non-Hazardous Waste (Kg)*	942,073	1,297,832	37.8%
Total Electricity Used (kWh)	9,757,125	10,360,817	6.2%
Electricity kWh Per Box Moved	8.91	8.00	-10.2%
Total Diesel Consumed (Litres)	4,110,518	5,044,180	22.7%
Diesel Usage (L) Per Box Moved	3.8	3.9	3.7%
Total Petrol Consumed (Litres) **	306	345	12.9%
Petrol Usage (L) Per Box Moved	0.00028	0.00027	-4.6%
Total LPG Usage (Kg)	23,063	24,113	4.6%
Total Energy Consumed in GJ	184,694	220,647	19.5%
Total Energy in GJ Per Box Moved	0.169	0.170	1.0%
Scope 1 Carbon Footprint (MT CO <sub>2</sub> eq) ***	11,491	14,261	24.1%
Scope 2 Carbon Footprint (MT CO <sub>2</sub> eq)	3,963	4,209	6.2%
Total Carbon Footprint (MT CO <sub>2</sub> eq) ****	15,454	18,649	19.5%
Total Carbon Intensity (kg CO <sub>2</sub> eq per box moved) **** & ****	14.11	14.26	1.0%
Emissions of Nox, Sox, and other air emissions	Within CEA	Within CEA	
	tolerance limits	tolerance limits	
Water Withdrawn (m³) from non-water stressed areas	70,819	52,488	-25.9%
Water Withdrawn (L) Per Box Moved	64.7	40.5	-37.3%
Discharge Quality of Effluent	Within CEA	Within CEA	
	tolerance limits	tolerance limits	
Total Significant Fines Paid (LKR) ******	0	0	0.0%
No. of Significant Spills ******	0	1	100.0%

<sup>\*</sup>Waste process under further review

<sup>\*\*</sup> Total diesel consumed for FY 2023/24 has been restated including wider sources for greater accuracy.

<sup>\*\*\*</sup> Scope 1 GHG emissions for FY 2023/24 has been restated to include methane (CH2) and nitrous oxide (N2O) components, which were not accounted for in previous years. Further emissions from fire extinguishers and wider diesel consumption points have been included for greater accuracy.

<sup>\*\*\*\*\*</sup> Scope 2 carbon footprint has been restated to reflect the Average Emission Factor published by the Sustainable Energy Authority of Sri Lanka to ensure greater accuracy.

<sup>\*\*\*\*\*\*</sup> The denominator to calculate the carbon intensity are the boxes moves by quay cranes for the relevant reporting period (2023/24: 1,094,917 2024/25: 1,295,261)

<sup>\*\*\*\*\*\*</sup> Significant fines are fines over Rs. 1Mn and significant spills are spills over 1 m3



# **CORPORATE GOVERNANCE**



SAGT firmly believes that governance is not only a necessity but a guiding principle that shapes its journey towards sustained value creation for all involved, and as such, it has a robust governance framework in place.

The Corporate Governance structure ensures adherence to all Sri Lankan laws and regulations concerning its operations, including but not limited to environmental, labour and human rights standards. SAGT also aligns with international governance frameworks where applicable. In addition to these legal requirements, SAGT also adheres to regulations set forth by key authorities including the Sri Lanka Ports Authority, Sri Lanka Customs, the Board of Investment of Sri Lanka, the Central Bank of Sri Lanka, the Central Environmental Authority Marine Pollution Prevention Authority, Telecommunication Regulatory Commission of Sri Lanka, among others.

Governance policies such as the Employee Code of Conduct and the Supplier Code of Conduct clearly outline the Company's responsibilities for the benefit of employees and all stakeholders with whom the Company engages. SAGT was also the pioneering entity within the Port of Colombo to introduce and enforce a whistleblowing policy and a policy against sexual harassment. The Company also adheres to the precautionary principle regarding operational and investment decisions. Disclosures related to the management approach and the process applied to embed these ESG policies within the organisation are available online at www.sagt.com.lk.

All grievances from the company's significant stakeholders or other parties can be directly addressed to the management via the Company website or email. A detailed description of the Company's grievance handling mechanisms for each material topic is provided in the aforementioned disclosures on SAGT's management approach. Furthermore, the company has integrated sustainability into its supply chain by launching a supplier portal, and by implementing a Supplier Code of Conduct. The Company is also in the process of implementing supplier assessment surveys for its key suppliers on an annual basis.

# THE CHAIRMAN OF THE BOARD AND THE CEO



The CEO of SAGT reports to the Board of Directors which is led by an independent Chairman. The roles of the Chairman and the CEO are clearly defined, ensuring a clear segregation of powers. This structure helps prevent any concentration of authority ensuring that no decisions are solely made by the CEO or Chairman.

### THE BOARD OF DIRECTORS

The Board of Directors oversees the conduct of the Company and is responsible for:

- Providing direction and guidance for the formulation of high-level, medium-term and long-term strategies to spearhead the Company's sustainable growth.
- Approving annual plans and long-term business plans as recommended by the Executive Committee.
- Assessing and evaluating the performance of SAGT holistically from a financial, non-financial and risk management perspective and decisions undertaken in this regard including those of the Board, including risks arising from Climate Change
- Ensuring that key sustainability topics that are material to the organisation including the risks posed by Climate Change is integrated across management systems, internal control mechanisms, and risk management frameworks through delegation of the same to various Senior Management bodies as mentioned below
- Overseeing the mitigation of impacts arising from SAGT's material topics via the implementation of the ESG Management Framework, Risk Management Framework, Sustainability Policies and procedures and focused initiatives.
- Authorising changes to the Board as well as modifications to delegated authorities including the Executive

Scan to view SAGT Disclosure Management Approach



Committee and Chief Executive Officer (CEO).

- Approving major acquisitions, disposals and capital expenditure as recommended by the Executive Committee.
- Approving any amendments to the concession agreement with the Sri Lanka Ports Authority.
- Approving, in principle, the issuance of any equity/debt securities.

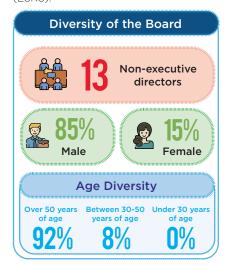
### **COMPOSITION**

The Board composition is formulated based on the shareholding structure of SAGTs shareholders.

The Board consists entirely of non-executive directors nominated by the shareholders. As they do not engage in the day-to-day operations, this structure effectively mitigates any potential conflicts of interest. Two members of the Board of Directors are female.

SAGT's Senior Management Team stays consistently updated on the evolving Sustainability reporting landscape. Additionally, memberships in various industrial bodies provide valuable insights into sustainability aspects related to shipping, logistics and reporting landscape, both from a local and global perspective.

Moreover, key management personnel collaborate closely with an external consultant to raise awareness about the evolving sustainability landscape, including new reporting requirements under IFRS, GRI Standards, as well as the recently introduced European Sustainability Reporting Standards (FSRS).



# The Executive Committee (ExCom) Under the delegated authority of

Under the delegated authority of the Board, the Executive Committee (ExCom) is responsible for:

- Reviewing annual and long-term business plans and recommending the same to the Board.
- Tracking actual progress against established plans.
- Ensuring operations are conducted within the framework of the Enterprise Risk Management (ERM) framework, including sustainability related risks and opportunities and risks related to climate change.
- Monitoring governance, compliance systems and ESG performance metrics on a quarterly basis
- Taking necessary action and decisions to minimise economic, environmental, and social impacts arising from the Company's operations.
- Reviewing major acquisitions, disposals and capital expenditures of an operational nature.

### COMPOSITION

The ExCom consists of three nominee directors including one female member representing John Keells Holdings, two nominee directors representing A P Moller/ Maersk, the CEO, and the Chief Financial Officer (CFO).

### The Audit Committee

The scope of functions and responsibilities of the Audit Committee are outlined within the Boardapproved terms of reference, which are reviewed annually by the SAGT Board. The Committee's responsibilities extend to the Company as a whole.

As per the Board-approved terms of reference, the role, duties and responsibilities of the Audit Committee are reviewed by the Board annually, and broadly include:

Reviewing the quarterly and annual financial statements to ensure their completeness, accuracy, transparency, integrity, and compliance with the Sri Lanka accounting standards as well as other applicable regulatory financial disclosure requirements.

- Evaluating the effectiveness and adequacy of the internal control and risk management systems of the Company and ensuring compliance with legal and regulatory requirements.
- Assessing the adequacy and effectiveness of the Company's internal control environment and ensuring ongoing improvements based on the recommendation of the Internal Audit, Risk and Compliance Division.
- Recommending the appointment or removal of External Auditors by assessing their performance, qualifications, expertise, resources, and independence as well as reviewing the terms of engagement and determining appropriate remuneration.

### COMPOSITION

The Audit Committee is composed of three Non-Executive Directors, with at least one member possessing significant, recent and relevant financial management and accounting experience along with a professional accounting qualification. The Head of the Internal Audit, Risk and Compliance division serve as the Secretary of the Audit Committee. Additionally, SAGT's CEO and Chief Financial Officer (CFO) are permanent invitees to all committee meetings.

### Remuneration of Employees

The remuneration of non-executive employees is determined through a Collective Agreement, which is signed with employee unions every three years. The remuneration of employee grades of executive and above is reviewed annually by a Career Committee, considering market rates, employee performance, responsibilities, competence and skills. This ensures fair and equal treatment of all executive staff. The process guarantees equal remuneration for all employees regardless of gender, race, sexual orientation, religion, cultural background or any other factor. Any changes to remuneration are based solely on factors such as performance, job level, experience and overtime hours.

# **CORPORATE GOVERNANCE**

# The Senior Management Team (SMT) and Management Committee (MC)

The formation of the SMT and MC aims to foster responsibility and accountability at a more granular level by assigning clear objectives to specific roles. Their responsibilities include:

- Regularly monitoring company-wide HSE practices and taking necessary corrective actions to cultivate a shared culture of health and safety.
- Conducting monthly operational reviews along with productivity and efficiency assessments.
- Performing quarterly reviews of SAGT's economic, environmental and social impacts arising from daily operations, including risks arising from Climate Change
- The MC is responsible for increasing engagement with various internal stakeholders and ensuring continuous employee engagement and empowerment.

The SMT and MC are responsible for monitoring and taking corrective action with respect to the Key Performance Indicators (KPIs) under SAGT's Sustainability Management Framework and Enterprise Risk Management (ERM) Framework. These include a range of indicators which also form the upward communication of critical concerns to the senior decision-making bodies.

- The Company's carbon footprint and impact on climate change
- Renewable energy and transition strategies for low carbon operations
- Water management,
- Energy consumption,
- Health and safety,
- Waste management
- Assessment of Physical and Transitional Risks of Climate Change along with the identified mitigation processes in the ERM Risk Register. This also includes the assessment of other Enterprise level risks outlined in the ERM Risk Register
- ESG KPI data is collated, analysed and presented to the MC on a monthly basis for review by the Company's Sustainability Division, overseen by the Chief Commercial Officer. The ESG KPIs covering the full scope

of SAGT's Material Topics, and the management and mitigation of SAGT's enterprise risks (Including that of Climate Change) are reviewed and addressed by the MC on a quarterly basis.

 The MC relies on quarterly reviews of these indicators to take corrective measures with respect to any potential environmental and social risks. These reviews also serve as the foundation for implementing various green initiatives across SAGT, systematically driving the company's sustainability agenda.

# COMPOSITION AND MEETING FREQUENCY:

The Senior Management Team (SMT) consists of ten members, including the CEO and relevant departmental General Managers and Deputy General Managers (HR, Operations, Commercial & Marketing, IT, Finance, and Engineering). Of the ten members one is female. The Management Committee consists of seventeen members including the CEO (who chairs the committee), the SMT and selected managers across the Company. Of the seventeen members of the MC, one is female.

The SMT and MC meet regularly to address key areas for discussion and drive continuous improvement. The Senior Management Team (SMT) convenes weekly while the Management Committee (MC) meets monthly. Attendance is mandatory for Committee members, unless a compelling reason for absence is provided. Meeting schedules are communicated to participants in advance.

The agendas for both SMT and the MC are structured to avoid duplication of effort, ensuring that discussions are complementary and support a seamless flow of information and accountability, both bottom-up and top-down.

A detailed overview of the Sustainability Management Framework is provided in the 'Sustainability Integration' section of this report, found on pages 30-31.

# GRI 205-1: OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION GRI 205-2 COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES GRI 205-3 CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN SAGT creates enhanced stakeholder

SAGT creates enhanced stakeholder value through its sustainable economic performance, which is driven by adhering to the highest standards of corporate governance, environmental stewardship, and social responsibility across its operations.

SAGT's activities are guided by the belief that ethical business practices are an organisational norm that is ingrained from top management down to every individual employee.

The Company's Code of Conduct serves as the primary tool for reinforcing ethics and integrity, including anticorruption policies and procedures, across the organisation. All new employees are made aware of the potential remedial and disciplinary actions for violating the Code and are required to read and acknowledge their acceptance upon receiving their letter of appointment. As a result, all 667 of SAGT's employees (100%) have received training on anti-corruption at the point of recruitment. In addition, all employees receive a physical copy of the Code of Conduct, which is also readily available on the intranet platform for reference. All 10 members (100%) of the Senior Management Team and all 13 Board Members (100%) have also read and understood SAGT's Code of Conduct.

SAGT's Whistleblowing Policy enable employees to report any breaches to the Code of Conduct with the assurance of confidentiality and anonymity. Alternately, employees are encouraged to report breaches or concerns directly to the CEO via email.

SAGT's Anti-Corruption Policy within the Company's Code of Conduct outlines the guidelines and frameworks necessary for enforcing disciplinary action, thereby maintaining a zerotolerance approach towards corruption. As part of the Company's risk management process, SAGT assesses the risk of corruption at the level of all 9 (100%) Business Units. Based on the

results, preventative plans are enforced to mitigate such risks.

The risk management process is further supported by SAGT's internal audit process which monitors and evaluates the effectiveness of existing controls to prevent corruption. Any findings from the internal audit are reviewed by the Audit Committee, and any identified lapses in processes or controls are addressed for improvement. Incidents of corruption along with corrective actions are tracked and measured through a quarterly KPI.

During the year under review, no incidents of corruption were reported. Additionally, no fines or sanctions were imposed on SAGT for non-compliance with laws or regulations.

### Stakeholder Engagement

SAGT utilises both formal and informal channels to foster robust interactions with its stakeholders, an essential approach given the diverse nature of its stakeholder base

The Company maintains formal agreements with global and regional shipping lines ensuring operational interactions through daily engagements with their designated representatives. During the year under review the Company launched a customer satisfaction survey which will be disseminated quarterly going forward. Furthermore, SAGT actively engages with its capital providers including primary shareholders and financiers, going beyond legal disclosure requirements to maintain transparent and meaningful relationships.

SAGT's suppliers engage with the Company's Supply Chain Division on a daily basis. This division is committed to promoting sustainable practices actively engaging with its key suppliers to ensure compliance with the Company's sustainability objectives.

For more information on stakeholder engagement refer the 'Sustainability Integration' section found on pages 27-38 of this report.

SAGT has also implemented comprehensive policies, processes, and systems designed to support effective recruitment, development, empowerment and retention of

employees, thereby facilitating strong employee engagement.

# SAGT's employee engagement approach includes:

- Inclusive participation: involving all levels of employees in the formulation of departmental plans, guided by the top management and senior staff. This bottom-up approach empowers employees to contribute to policy development.
- Access to Leadership: SAGT's committee structure ensures that employees have direct access to management at all levels, fostering open communication and inclusivity.
- 3.Encouragement for employees to share new ideas and innovations:
  The Company has cultivated an environment that supports constructive criticism and feedback through its open-door policy, monthly town hall meetings and an annual employee opinion survey. These initiatives provide valuable input that informs more effective decisionmaking. The management encourages employees to come up with new ideas and innovations.

### Memberships and Associations

To support overall engagement with industry stakeholders and peers, SAGT collaborates closely with trade associations and business chambers to drive common goals that promote industry growth and foster a culture of sustainable development benefitting all stakeholders.

SAGT actively participates as a member in the following trade industry organisations:

- Ceylon Chamber of Commerce -Patron Member
- World Ocean Council Member
- European Chamber of Commerce & Industry Member
- Indo Lanka Chamber of Commerce & Industry - Executive Committee Member
- Sri Lanka, Australia, New Zealand Business Council - Executive Committee Member
- Sri Lanka China Business Council Member
- Sri Lanka Bangladesh Business Council - Member

- Sri Lanka Japan Business Council -Member
- Employers Federation of Ceylon Member
- United Nations Global Compact Network - Member
- American Chamber of Commerce -Member

In addition, SAGT's Senior Managers play an active role in supporting the industry in their respective roles as office-bearers in the following trade/industry associations:

- Chairman of the National Agenda Committee of Transport & Logistics – Ceylon Chamber of Commerce
- Senior Vice President of the Association of Human Resource Professionals
- President of the Sri Lanka, Australia, New Zealand Business Council
- Foundation Member- Sri Lanka Rugby (SLR)
- Member of the Logistics Advisory Committee of the Export Development Board, by appointment of the Minister of Trade
- Committee member of the Sri Lanka-China Business Council
- Immediate past president of the Indo Lanka Chamber of Commerce

SAGT also maintains partnerships with the following organisations:

- Chartered Institute of Logistics & Transport - Corporate Partner
- International Finance Corporation (IFC) - "SheWorks" Sri Lanka
   Partnership, Women in Work program
   Corporate Partner
- Institute of Chartered Shipbrokers Corporate Partnership
- Women's International Shipping & Trading Association (WISTA)
- Women in Logistics and Transport (WiLAT)
- Sri Lanka Shippers Council Corporate partnership
- Signatory to the Women's Empowerment Principles of UN Women and UN Global Compact Network

# **RISK MANAGEMENT STRATEGY**

Risk management is integrated into every aspect of SAGTs business, forming a core element of the Company's strategies and processes. It is central to shaping the Company's sustainability initiatives, operational framework, and governance practices. SAGT has developed a robust risk management system aimed at proactively identifying and addressing potential risks, ensuring the continued resilience and success of the business.

# THE INTERNAL AUDIT, RISK AND COMPLIANCE DIVISION:

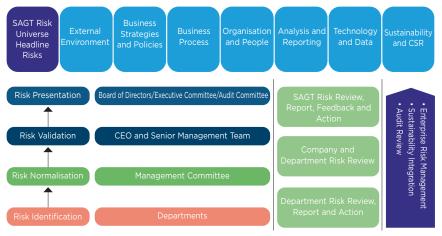
The responsibility for ensuring that SAGT adheres to its risk policies, procedures, and regulatory compliance requirements rests with the Internal Audit and Risk and Compliance Division. The Risk and Compliance Division is tasked with providing regular reports to the Audit Committee on the adequacy and effectiveness of the Company's internal control systems.

The Head of the Risk and Compliance Division presents updates and follow-up actions regarding significant matters to the Audit Committee each quarter. Additionally, the Head of the Audit Committee oversees all risk management activities collaborating with the Company's management to identify, assess, and address potential and significant risks. The Head of the Risk and Compliance Division is also responsible for obtaining formal assurances from Senior Management quarterly, regarding the effectiveness and status of internal controls and risk management systems, and confirming the Company's compliance with relevant laws and regulations.

The effectiveness and resource requirements of the Audit and Risk and Compliance Division are reviewed regularly by the Audit Committee, while the Company's audit functions are primarily outsourced to leading external professional firms.

### **ENTERPRISE RISK MANAGEMENT (ERM) PROCESS:**

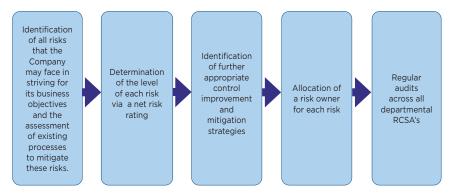
The Enterprise Risk Management (ERM) process at SAGT follows a bottom-up approach, starting at the departmental level. The Company adheres to process flow for risk management activities and reporting, as illustrated in the diagram below.



Operational Units/Management Bodies

Report Content

Company risks are identified, documented, and recorded through departmental Risk Control Self-Assessment (RCSA) documents, which are then consolidated into a company-wide RCSA. These risks are assessed and managed in the following manner:



### **RISK IDENTIFICATION:**

Risk events are occurrences that could significantly hinder SAGT's ability to achieve its predetermined objectives if they take place. SAGT classifies risk events into three levels:

- Common Risks: These are risks commonly identified across departments during their respective RCSAs. Identified risks are then incorporated into the Company's consolidated risk grid and assigned an appropriate rating.
- Department-specific Risks: These are risks that apply specifically to individual departments, reflecting unique challenges or circumstances within those areas.
- 3. Core Risks: These are risks that could have a catastrophic impact on the Company, both internally and externally. While the likelihood of such risks occurring is typically very low or even zero, their occurrence would pose a significant threat to the sustainability or long-term viability of the business.

The key risks are summarised below along with their corresponding ratings:

Key Risks	Rating
Health and safety	
Natural disasters and climate change impacts	
Global competition	
Cyber security risk	
Fires and explosions	
Regulatory compliance	
Supplier governance risk	
Breakdown of internal controls	
The macroeconomic and political environment	

Ultra High High	Medium	Low	Insignificant
-----------------	--------	-----	---------------

### **RISK RATING:**

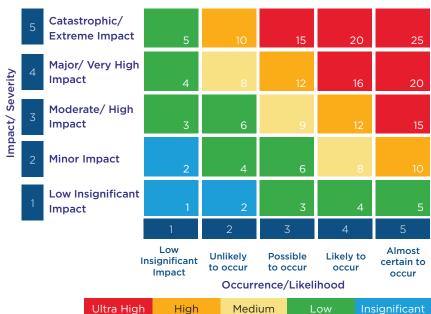
SAGT applies the rating system outlined below to determine each risk event's level of risk

- Likelihood of occurrence: the probability of occurrence is rated from 1 to 5
- The severity of impact: the impact to business is rated from 1 to 5
- The Velocity of Risk: the speed at which the impact of the risk would hit the organisation

Identified risks are evaluated using a matrix that considers both "Impact to the Company" and "Likelihood of Occurrence." Each risk is then assigned a score based on this assessment and documented in the Risk Control Self-Assessment (RCSA). Risks are categorised on a scale ranging from "Insignificant" to "Ultrahigh" to ensure effective risk management and mitigation.

The Company's residual risk is defined as the overall risk level assigned, upon considering existing risk control and mitigation measures.

### **GUIDELINE FOR RATING RISKS**



## RISK MITIGATION, MONITORING AND REPORTING:

Each risk event is assigned a corresponding mitigation action within the risk management framework, classified as either preventive, detective, or corrective. The designated Risk Owner is responsible for managing the specific risk and overseeing the development and implementation of plans to mitigate it.

The Company's departmental-level RCSAs undergo quarterly reviews, which are managed by individual departments. These departments are responsible for conducting the reviews and communicating their findings to the Management Committee for appropriate action. This process ensures that individual risk ratings are continuously updated and consolidated within the Company's overall RCSA for the quarter.

The Head of Internal Audit and Compliance monitors and analyses any variations and changes within the SAGT risk rating system. This involves risk profiling, tracking and incident reporting.

The Senior Management Team (SMT) and the Executive Committee (ExCom) analyse and review both Company-specific risks and risks common to the sector and industry, involving the Audit Committee as needed for further insights and decisions.

# **RISK MANAGEMENT STRATEGY**

The below table summarises the risk description, ratings and mitigatory actions for the organisation's key risks.

Safety incidents may cause serious injuries or fatalities, leading to service disruptions     Damage to property or equipment can impact operational continuity	Mandatory Safety Induction Program for employees, contractors, and visitors.  Contractor Management Program comprising weekly meetings and discussions with critical contractor groups employed within the terminal.  Regular safety drills and trainings for employees and contractors to bolster incident readiness.
serious injuries or fatalities, leading to service disruptions  Damage to property or equipment can impact operational continuity	with critical contractor groups employed within the terminal.  Regular safety drills and trainings for employees and contractors to bolster
Damage to property or equipment can impact operational continuity	
operational continuity •	
	Safety procedures are reviewed and updated periodically.
High Risk	Safety training carried out for relevant staff and contractors as and when required.
•	Regular Audits and inspections on health and safety procedures.
•	Mandatory safety refresher for employees and contractors annually.
	Management safety walks are conducted by cross functional teams to identify and rectify potential health and safety risks.
	Insurance covers are in place for key terminal assets.
	Risk assessments are mandatory for all work taken up within the terminal.
	Periodic review of standard operating procedures and risk assessments.
•	Technology adaptation to minimise human machine interaction.
Natural Disasters and Climate Change Impacts	Business continuity plan along with a comprehensive disaster recovery plan, health and safety processes and port infrastructure in place.
	Weather conditions are actively monitored.
• Operational disruptions due to	Key equipment are fitted with tie down mechanisms to prevent catastrophic damage.
extreme weather events     Potential damage to critical	Employees and contractors are trained to handle emergency situations through trainings, drills etc.
machinery and infrastructure	Relevant insurance policies are in place.
employees and contractors	Transition to a low-carbon operation is guided by both financial and non-financial evaluation criteria, with the Finance Division assessing payback periods and ROI before implementing transition strategies.
Increased operational and recovery costs	Further details on page 26
High Risk	raither details on page 20
Global Competition •	Maintaining strong relationships with key stakeholders to the business
Loss of transshipment business	
to other terminals in the region	
leading to negative impacts in profitability	
High Risk	practices
Cyber Security Risk •	IT Policy, data security process and data backup procedures are in place
Compromised critical business     and customer data may lead	Implementation of a Security Operation Centre to monitor cyber activities 24/7.
and customer data may lead to service disruptions and	Policy and security controls undergo continuous assessment.
reputational loss	3
Potential exposure to legal action	provided during the assessments are implemented to improve risk mitigation processes.
High Risk	

Risk Description and Rating	Mitigatory Actions
Fire/ Explosion	Business Continuity Plan, Disaster Recovery Plan and evacuation plans in place.
Serious lost time injuries/ fatalities to employees and contractors resulting in service	<ul> <li>Pre-planned fire drills are conducted with employees and contractors on a periodic basis.</li> <li>The Emergency Response Team is trained for handling emergencies.</li> </ul>
disruption.	Fire alarm system is in place in the building, yard and on key equipment.
<ul> <li>Property/ equipment damage leading to service disruptions.</li> </ul>	
Increased costs	<ul> <li>Fire inspections are conducted on an annual basis by an external party.</li> <li>Hazardous cargo within the terminal premises is monitored daily.</li> </ul>
Medium Risk	
	Insurance covers are in place for key terminal assets
Regulatory Compliance	Adhere to procedures and continuously review and update standards
Regulatory violations may lead to legal, financial, and reputational consequences	<ul> <li>Benchmark against international standards</li> <li>Maintain critical activity calendar for renewal of license and certification</li> </ul>
Breach of concession terms could result in a complete halt of operations	
Medium Risk	
Supplier Governance Risk	A supplier code of conduct is in place which is included on all supplier contracts
Negative impact to Company reputation due to legal, regulatory compliance and privacy issues	<ul> <li>All significant suppliers are registered on SAGTs vendor management portal</li> <li>Periodic review of supplier performance and enforcement of supplier contracts</li> <li>Bi-annual leadership meetings with key suppliers</li> </ul>
Medium Risk	
Breakdown of Internal Controls	Key processes are analysed with segregation of duties, approval limits, decision
Disruptions to internal	rights and committee structures.
processes may affect operations and profitability	Monitoring control processes and internal and external audit processes
Potential reputational damage to the Company	Action internal and external audit findings and reviews
Low Risk	
Macroeconomic and Political Environment	Continuously monitor macro-economic conditions that could have an impact on the business
Negative/ positive impacts to business	Pre-emptive planning with key stakeholders to avoid congestion within the yard
Loss of throughput against	Continuous collaboration with key industry stakeholders such as shipping lines and other terminal operators within the Port of Colombo and the region.
budget, yard congestions and vessel by-passes.	

# **RISK MANAGEMENT STRATEGY**

# SAGT's readiness to meet risks associated with Climate Change:

Climate change risks highlight the potential negative impacts of climate change on both human and ecological systems. Whilst these risks are integrated into SAGT's Enterprise Risk Management (ERM) framework, they can be divided into two categories: physical risks and transition risks.

Physical risks stem from natural disasters such as floods, high winds and other unfavourable weather conditions. SAGT has in place a Business Continuity Plan along with a comprehensive Disaster Recovery Plan, health and safety processes and port infrastructure to avoid damage to the terminal due to natural disasters. The Company also has business interruption and workmen's compensation insurance as a precaution in the event of physical risk.

Transition risks relate to the changes in policy, law, technology, and markets that result from the transition to a low-carbon economy. The decision to transition to low-carbon operations is driven by both financial and nonfinancial evaluation criteria. The Finance Division plays a key role in assessing payback periods and return on investment (ROI) before moving forward with any transition strategies. While over 30% of Sri Lanka's electricity generation is from renewable sources, there are currently no regulations regarding a transition to a low-carbon economy, no carbon pricing, nor limits on emissions or effluent discharge in Sri Lanka.

Since 2019, SAGT has invested in transitioning to low-carbon alternatives, including adopting energy-efficient technology, investing in solar energy, replacing fossil fuel-driven equipment with hybrid technology, and forming strategic partnerships. These investments undergo rigorous financial and non-financial evaluations to ensure that risks related to transitioning to a low-carbon operation are mitigated effectively. Details of these investments can be found in the Environmental Stewardship section from pages 42 to 53 of this report.

SAGT believes that these investments in low-carbon operations, as well as its commitment to Environmental, Social, and Governance (ESG) performance, enhances the Company's social license to operate and positions it as a market leader in efficient port operations, all within the broader context of Corporate Responsibility.

### **INTERNAL COMPLIANCE**

SAGT ensures compliance with statutory and other regulatory procedures through a quarterly self-certification process, which is verified and confirmed by the CFO and CEO. They are also responsible for identifying any significant deviations from expected conditions and taking necessary actions to address any discrepancies. This process helps maintain the Company's adherence to legal and regulatory requirements, ensuring transparency and accountability across its operations.

### SYSTEM OF INTERNAL CONTROL

The Senior Management Team and Executive Committee, in collaboration with the Head of Internal Audit and the Risk and Compliance Division, are responsible for obtaining assurances regarding the presence and effectiveness of systems designed to safeguard the Company's assets. This includes ensuring that these systems are functioning properly and provide adequate protection for the Company's resources. Their efforts are crucial in maintaining operational integrity, security, and risk mitigation throughout the organisation.

# SAGT's system of internal controls comprises the following activities

- Clearing all transactional entries in a timely manner and ensuring complete reconciliation to maintain the accuracy and integrity of financial records.
- Subjecting unreconciled and open entries to scrutiny and formally flagging them for the attention of the Audit Committee and ensuring necessary corrective actions are taken promptly.

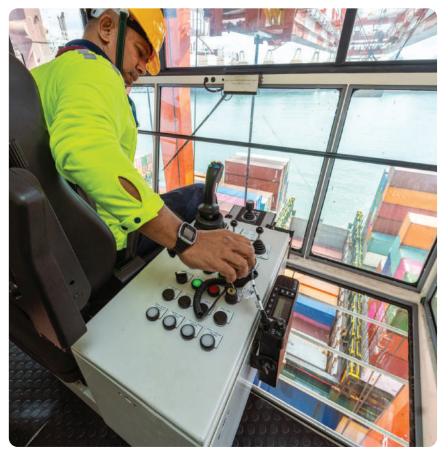
- Ensuring cash and cheque deposits are efficiently managed and tracked in adherence to best practices to ensure transparency and security in financial transactions.
- Continuously streamlining the Internal Audit function by optimising focus areas, enhancing efficiency, and ensuring thorough oversight across key business operations.

# Segregation of Duties (SOD) under Sarbanes-Oxley (SOX) Guidelines

SAGT takes every precaution to ensure that no individual has unrestricted access to execute transactions across the organisation. To mitigate risks such as fraud, material misstatements, and manipulation of financial statements, the Company has implemented critical approval linkages and a clear segregation of duties. This helps prevent leakage of sensitive information and ensures that operational processes remain secure.

The impacts of SAGT's material topics, including the risks posed by climate change, are assessed on a quarterly basis from an ESG risk management perspective. This assessment is conducted using Key Sustainability Performance Indicators (KSPI) and Key Risk Indicators (KRI), which align with GRI Standards. In addition to these standards, SAGT tracks more detailed information to enable management to make data-backed decisions. The KSPIs and KRIs are reported internally to the Management Committee every quarter, allowing the Company to take corrective actions based on its ESG performance in a timely manner.

Further details regarding the implementation of SAGT's ESG Management Strategy can be found in the "Sustainability Integration" section, along with disclosures related to Environmental Stewardship and Social Responsibility within this report.



Sustainability is ingrained in our corporate ethos and business strategy

Located in the Port of Colombo. SAGT is one of four key container terminal operators contributing to Sri Lanka's growing prominence as a world-class transshipment hub. From its inception, SAGT has recognised the critical importance of sustaining and enhancing the competitive advantage derived from Sri Lanka's strategic geographical location, along with its own unique strengths. Ensuring the well-being of its people, customers, business partners, and the environment is not only integral to SAGT's sustainability but also to maintaining the profitability of the Company's operations and Sri Lanka's competitiveness as a transshipment hub

As such, sustainability is embedded in SAGT's corporate ethos and business strategy guided by comprehensive materiality assessments and the identification of key topics that are most significant to the Company.

SAGT's sustainability journey begins with its robust Sustainability Management Framework (SMF), which integrates sustainability objectives into the core of the Company's strategic and long-term goals. These objectives focus on operational excellence, providing exemplary service to its customers, and developing an integrated value chain. The goals are then cascaded across the Company, ensuring alignment with Management Approaches and Standard Operating Procedures (SOPs) at every division and operation.

The implementation of SAGTs Sustainability Management Framework (SMF) is supported by a robust system of Sustainability Performance Management, regular Materiality Assessments, adherence to Standard Operating Procedures (SOPs) and globally recognised accreditations. Internal and external

assurance processes further support SAGT's commitment to sustainability. By adhering to internationally recognised reporting standards and frameworks such as the Global Reporting Initiative (GRI), the United Nations Sustainable Development Goals (SDGs), and the United Nations Global Compact (UNGC), the Company enhances the management and transparency of its non-financial disclosures. This alignment ensures a thorough, responsible and forwardlooking approach to sustainability, reinforcing its commitment to long-term Environmental, Social, and Governance (ESG) goals.

Aligned with its business objectives, SAGT's Sustainability Framework is built upon three core pillars: Responsible Economic Contribution, Environmental Stewardship, and Labour Practices & Social Responsibility.

SAGT ensures a comprehensive understanding of stakeholder interests and key ESG topics through a broad-based engagement process. This process is integrated with the Company's daily business operations, to derive long-term value for the business and its stakeholders.

Sustainability performance is continuously monitored through Key Sustainability Performance Indicators based on the GRI standards, Key Risk Indicators and assurance programs. The Senior Management Team (SMT) reviews policies and key indicators annually, aligning them with the UNSDGs. Significant impacts are addressed monthly during Management Committee meetings to guide strategy, investment decisions, and operational improvements.

The following section outlines SAGTs strategic sustainability management framework and demonstrates how sustainability is embedded across all levels of the Company's business operations.

### SAGT'S SUSTAINABILITY PRIORITIES

### SAGT'S SUSTAINABILITY PRIORITIES









- Materials
- Energy
- Water and Effluents
   Management
- Emissions Management
- Environmental Compliance
- Supplier Assessments

- Employee Engagement
- Training and Development
- Labour Relations
- Diversity equity and inclusion in our Human capital management with a special focus on women
- Customer privacy
- Socioeconomic compliance

- Transparency and Accountability
- Stakeholder Engagement
- · Code of Conduct
- Sustainability Reporting
- Non discrimination
- Freedom of Association
- Zero-tolerance towards forced and compulsory labour
- Occupational Health and Safety
- Customer Health and Safety
- Cyber Security
- Robust Emergency Response

### SUSTAINABILITY POLICY

SAGT's Sustainability Policy is anchored in ethical practices and principles of corporate responsibility. While complying with all applicable local and international regulatory requirements at a minimum, SAGT sets benchmarks in its operations, environmental stewardship and social responsibility. Operational impact is monitored and assessed while ensuring transparent communication on key ESG practices.

SAGT prioritises on mitigating its environmental impact through decarbonising terminal operations, and waste, materials and water management.

The Company is committed to fostering a safe, secure and non-discriminatory working environment, focused on diversity, equity and inclusion with a specific focus on female empowerment. As such all employees are offered equal opportunity for personal and professional development.

SAGT adheres to a comprehensive Code of Conduct, while safeguarding the human rights of its workforce and supply chain by complying with all applicable local and international labour laws and regulations and standards. Further, adherence to minimum wages and the payment of statutory provisions in relation to its outsourced manpower are periodically assessed.

The Company follows a zero-tolerance policy with regards to forced and compulsory labour and child labour and emulates global best practices in relation to non-discrimination and freedom of association.

SAGT carries out numerous projects aimed at uplifting local communities contributing towards the development of livelihoods within the nation.





# POLICIES

**KEYELEMENTS OF THE SMF** 

# IDENTIFYING STAKEHOLDER CONCERNS

The identification and prioritisation of key stakeholders and their concerns is done through an internal perception materiality assessment considering a double materiality approach. The Materiality Assessment considers an impact-based assessment of the importance placed by stakeholders on environmental and societal topics (impact materiality), and also considers the risks to the organisation and investors arising from dependencies of environmental and social factors (financial materiality). SAGT utilises the GRI Standards to identify its universe of material topics and GRI 3 and the AA1000AS Standard's 6-part materiality test to identify prioritised impact topics. The COSO Risk Management Framework is then utilised to assess the risks and opportunities arising from environmental and social dependencies, and then classified based on their importance and impact. SAGT's materiality assessment for the reporting year was aligned in accordance to the AA1000AS Standard and the GRI 3 standard on materiality assessment. While Climate change in particular was identified as a significant risk for the company through both its materiality assessment and its enterprise risk management process, and its impacts and mitigation plans associated with the related physical and transition risks, were analysed.

# POLICY AND FRAMEWORK

The Company has established policies related to environmental, social and governance factors, such as its Energy and Emissions Policy, Water Management Policy, Health & Safety Policy and Anti-Corruption Policy. These policies are complemented by management procedures and Standard Operating Procedures (SOP). Further, the policies and policy framework undergo regular reviews by the Senior Management Team. The Policy Framework of SAGT is designed to address the prioritised impacts, risks and opportunities derived through its materiality assessment.

# DATA TRACKING & ANALYSIS

The Company measures, monitors, and tracks the progress of its chosen sustainability indicators using a Sustainability Performance Tracking Tool - the Sustainability Performance Analyser introduced in 2019. This tool enables the collection, consolidation and analysis of information pertaining to the Key Sustainability Performance Indicators (KSPI), by the Sustainability team, on a quarterly basis. Since 2021, SAGT has been compiling data on a monthly basis to further strengthen management intervention and be able to deliver speedier responses. The KSPI's cover a range of performance metrics that are aligned with the Global Reporting Initiative (GRI) standards, which are crucial for assessing sustainability across material topics. These indicators ensure that the Company adheres to internationally recognised sustainability guidelines. These KSPI's are shared with the Management Committee on a monthly basis for review, investment and action as necessary.



# BENCHMARKING AND VARIANCE CONTROL

In addition to monitoring its performance against internal goals and targets, SAGT actively benchmarks against industry best practices, recognised standards and performance of key peers. This commitment enables the Company to continuously measure its progress within the broader industry context, adopt leading-edge approaches and position itself as a proactive influencer and a catalyst for change within the sustainability landscape of the industry.



# SUSTAINABILITY INITIATIVES

SAGT engages in a range of initiatives which are carried out at organisational and departmental levels. At the organisation level, SAGT tackles significant global challenges such as climate change through comprehensive initiatives aimed at reducing its environmental impact and promoting sustainable practices across all operations. Simultaneously, economic and social sustainability goals—such as driving cost rationalisation, enhancing operational efficiency, and strengthening stakeholder engagement—are championed by individual departments.



# SUSTAINABILITY REPORTING AND EXTERNAL ASSURANCE

SAGT produces a thorough sustainability report, aligned with key global standards including the Global Reporting Initiative (GRI) standards, the United Nations Global Compact (UNGC) principles, and the United Nations Sustainable Development Goals (SDGs). This comprehensive approach ensures transparency and reinforces its commitment to responsible environmental, social, and governance practices. SAGT ensures that all annual Sustainability Reports are assured by an independent 3<sup>rd</sup> party to ensure credibility of reported information.

# RESPONSIBILITY FOR DRIVING ESG SUSTAINABILITY AT SAGT:

The organisational structure for sustainability, supports the effective execution of SAGT's sustainability agenda and the achievement of its sustainability goals. It ensures that performance related to key material topics is regularly assessed and managed by the Senior Management Team (SMT). The CEO, through the Management Committee, holds responsibility for developing SAGT's Sustainability Management Framework (SMF). This framework is created in collaboration with the Senior Management Team and the Sustainability Division, with valuable input from various operational departments to shape policies and management strategies.

# SAGTS ORGANISATIONAL STRUCTURE FOR SUSTAINABILITY



### THE SUSTAINABILITY DIVISION:

The Sustainability Division is responsible for overseeing the implementation of the Sustainability Management Framework (SMF) and executing its strategies through the following key roles and responsibilities.

- Collaborating with the nine
   Departments to ensure the timely
   capture of all Environmental, Social,
   and Governance (ESG) data, and
   managing the input of quarterly and
   monthly sustainability data through
   the Sustainability Performance
   Analyser.
- Compiling the internal sustainability report for the CEO and Management Committee's review of the year's sustainability performance.
- Providing input to the CEO and Management Committee on sustainability impacts associated with new projects, to ensure that sustainability-related risks including climate change risks are mitigated and environmentally friendly principles and practices are incorporated at the planning stage.
- Facilitating the annual external assurance process and the periodic internal assurance audits to verify the completeness and accuracy of data as well as the adherence to relevant Standard Operating Procedures (SOP's).
- Conducting research on industry best practices, performing benchmarking studies, and identifying gaps to set ambitious

- sustainability goals and targets for the Company.
- Identifying sustainability risks that may arise internally or along the value chain and working with relevant departments to help suppliers mitigate their risks.
- Mentoring and guiding suppliers to enhance their sustainability performance, fostering a culture of continuous improvement.
- Identifying new initiatives, process improvements and opportunities for cost savings in collaboration with the nine Departments to ensure effective implementation of these strategies.
- Raising awareness and sharing knowledge on Sustainability, best practices and emerging trends on sustainability through regular internal and external campaigns and engaging employees in sustainability initiatives.
- Compiling and delivering the Annual Sustainability Report, showcasing the Company's sustainability performance and progress towards goals.

# SUSTAINABILITY THRUST AT DEPARTMENT LEVEL:

A Sustainability Champion within each of the nine Departments is tasked with implanting the Company's SMF based on the identified material topics and selected frameworks. Through the efforts of each designated Sustainability Champion, the Departments are responsible for:

- Recording and monitoring sustainability data as per the SOP, in a timely and accurate manner.
- Maintaining source documents to enable internal sustainability assurance.
- Collaborating with the Sustainability
  Team to implement sustainability
  initiatives and process improvements
  relevant to each Department.
- Finding ways to enhance sustainability performance across the value chain, by sharing knowledge and best practices in sustainability.

### SUSTAINABILITY REPORTING:

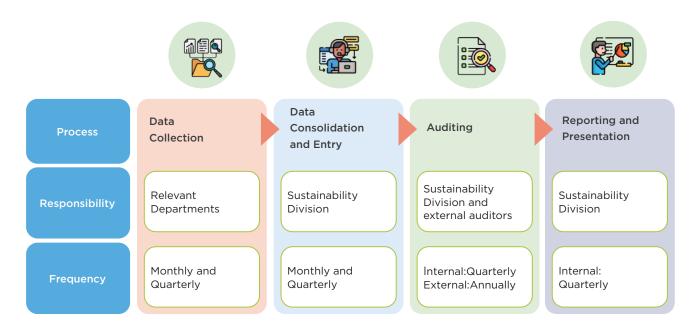
SAGT follows a robust reporting process that includes both external and internal reporting cycles to ensure transparency and effective management of sustainability performance.

### External Reporting:

The annual Sustainability Report serves as the Company's primary comprehensive tool for communicating with external stakeholders. It outlines the scope of its operations and provides detailed insights into its sustainability performance, following the Global Reporting Initiative (GRI) Standards.

### **Internal Reporting Process:**

SAGT's internal reporting consists of a quarterly report, with select indicators extended to a monthly cycle. These indicators track operational efficiency, compliance, and key



sustainability areas, providing relevant management information to support informed decision-making and a more comprehensive approach to capital budgeting.

Any critical concerns relating to material topics are raised to the Senior Management Team and Management Committee on a monthly and quarterly basis.

### **DEFINING REPORT CONTENT**

This report details SAGT's sustainability strategy, corporate governance framework, risk management process, environmental and social responsibility efforts, and discloses the measures taken by SAGT to achieve an improved holistic sustainability performance.

While ensuring compliance with all regulatory requirements at a minimum, SAGT's operations are guided by the 'Precautionary Principle' resulting in responsible investment and operational decisions. This policy commitment ensures minimal impact on natural resources, the environment and reduces the company's carbon footprint while minimising its effect towards climate change. SAGT's Sustainability policy also commits towards ensuring the protection of human rights in its operations and its value chain as far as practicable, whilst also committing to

ensuring a safe and productive work environment for all staff.

This being the Company's sixth sustainability report, any restatements or changes made to the specified sustainability data during the year under review is clearly outlined in the relevant sections of this report. All data included in SAGTs sustainability reports over the last five years have been validated internally through senior management review as well as externally, through an independent third-party assurance provider.

This report serves as the company's primary Communication on Progress (CoP) with regards to its sustainability strategy, policies and performance of its prioritised material topics, to its stakeholders. All of the stakeholders' concerns and clarifications on the organisation's policies and practices, can be addressed by contacting the Company's Chief Commercial Officer, whose details are provided in the "About this Report" section of this report.

# STAKEHOLDER ENGAGEMENT AND IDENTIFICATION OF MATERIAL TOPICS:

The identification of key stakeholders is driven by insights gathered through discussions with key business units

and operational departments. Once identified, stakeholders are prioritised based on their potential impact and influence on the Company and the impact of the company's operations on stakeholders. The impact-influence matrix for broader stakeholder groups forms the foundation for developing an effective engagement strategy, including determining the basis for engagement, setting the preferred frequency of interaction, and assigning responsibilities for engagement activities.

SAGT maintains an ongoing and comprehensive stakeholder engagement process, seamlessly integrated into its daily operations. This continuous approach ensures that the Company remains responsive to stakeholder concerns in real time. allowing for proactive and effective responses. Dialogue with stakeholders provides the foundation for identifying and prioritising issues based on their significance to both the Company and external stakeholders. These issues are then mapped according to their potential impact on the Company and stakeholders.



Stakeholder	Method of engagement	Basis of engagement	Frequency	Issues/concerns
Customers	<ul><li>Materiality survey and interviews</li><li>Customer feedback</li><li>One-on-one communication</li><li>Sustainability report</li></ul>	Meeting minutes     Feedback form     Emails     Visits	<ul><li>Every 2-3 years</li><li>Annually</li><li>Regularly</li></ul>	<ul><li>Competitive pricing</li><li>Berth productivity/ Reliability</li><li>CO2 emissions</li></ul>
Suppliers	<ul><li>Correspondence with major suppliers</li><li>Supplier audits</li><li>Sustainability report</li></ul>	PO, tender documents     Supplier selfassessment form	Ongoing     Annually	<ul> <li>Price and volume</li> <li>Credit period</li> <li>Longevity of contracts</li> <li>Operational matters and business issues</li> </ul>

Stakeholder	Method of engagement	Basis of	Frequency	Issues/concerns
Employees	<ul> <li>Materiality survey and interviews</li> <li>Employee appraisals</li> <li>Training and development programmes</li> <li>Company events</li> <li>Toolbox meetings</li> <li>Surveys</li> <li>Newsletters</li> <li>Notice boards</li> <li>Intranet and social media platforms</li> <li>Team briefings</li> <li>SAGT's Code of Conduct</li> </ul>	Email     Performance     appraisal form     Survey reports     Presentations     Published report	Every 2-3 years     Annually     Ongoing     As needed     Daily     As needed     Quarterly     Regularly     Ongoing     Monthly	Salary/benefits/career development     Training and development     Occupational Health and Safety (OHS)     Equal opportunities
Shareholders	<ul> <li>Materiality survey and interviews</li> <li>Sustainability report</li> <li>Other interactions</li> </ul>	Meeting minutes     Email     Meetings	Board meeting thrice a year and audit committee meeting	Dividend Governance Compliance Timely information on business performance, strategy, operating landscape and business outlook
Trade unions	Meetings with trade union representatives     Meeting with CEO     Collective Labour Agreement Discussions discussion     Meeting with parent trade union officials	Meeting minutes     Correspondence     Collective     agreement     MOU	Monthly, quarterly	Benefits/rights for members     Compliance     Grievance handling
Government	<ul><li>Formal and informal communication</li><li>Audits</li><li>Joint inspections</li><li>Other meetings</li></ul>	<ul> <li>Permission request letters</li> <li>Agreement</li> <li>Compliance licenses</li> <li>Request letters</li> </ul>	Monthly     Annually     Annually     As needed	Regulatory compliance     Impact to environment     Industrial relations
Statutory bodies	Meetings     Compliance audits	Survey reports     Inspection reports, license renewal documents, and audit reports	Monthly, annually     Annually	Environment compliance     Employee health and safety     Equipment testing
Industry peers	Meeting with working group levels     (ITT)     Meetings to discuss/overcome     operational issues     Other interactions	Meeting minutes     Circulars     Email and other correspondence	• Daily • As needed • As needed	Cooperation     Ethical business     Port strategies for Hub status
Local community	<ul> <li>Partnerships with non-profit organisations</li> <li>Community engagement and CSR programmes</li> </ul>	Request letters     Agreements	As needed     As needed	Employment of local community members     Training     CSR activities
Global industry monitors	Meetings     Events	• Letters, emails	Annually     As needed	Environmental impact     Corporate ethics     Social responsibility
Media and NGOs	Meetings     Other interactions	Meeting minutes, emails     Press releases, reports	Annually     As needed	Reliability/ frequency of engagement     Environmental impact     Longevity of partnerships
Debt providers	Meetings     Other interactions	Email and other correspondence	As needed     As needed	<ul><li>Saving/borrowing rate</li><li>Level of service</li><li>Payments</li></ul>

# MATERIALITY ASSESSMENT:

A Materiality Assessment is conducted periodically to identify ESG issues that are most relevant to the Company, its investors, stakeholders, and long-term value creation. Material topics are those that have a significant impact on SAGT's business or, are of high interest to stakeholders. Its assessment process follows the GRI Standards topics, AA1000AS Standards Version 3 Guidance Document and the recommended methodology of prioritising impact material topics outlined in the GRI 3 Standard.

SAGT has identified key ESG risks and assessed sustainability-related risks and opportunities (SRROs) in terms of

their impact on both the Company and stakeholders. This assessment process is based on the principles of the COSO framework and the six-part Materiality Test outlined in the AA1000AS Standard, which includes the following factors:

- Direct financial impacts
- Policy-related performance
- Organisational peer-based norms
- Stakeholder behaviour and concerns
- Societal norms

The Company also assesses the likelihood and severity of identified ESG risks to the Company and Investors based on the COSO Risk Management

Framework to determine an overall ESG ranking. This ranking serves as the foundation for prioritising material topics, which are then used to identify Key Sustainability Performance Indicators and relevant GRI Standard disclosures.

As a result of this process, SAGT has prioritised 17 material topics and selected 44 GRI Standard topic-specific disclosures for both internal and external reporting, This section also outlines the strategies and management approaches implemented to address SAGT's material topics.

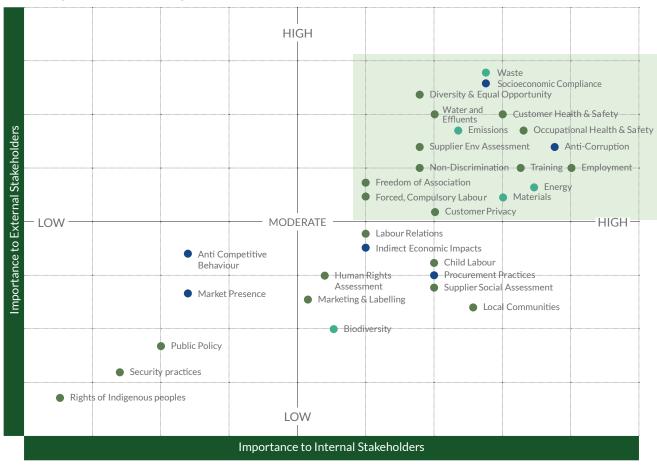
No:	GRI Standard Topics/ General Disclosures	Topic Specific Disclosures
1	GRI 205: Anti-Corruption	205-1: Operations assessed for risks related to corruption 205-2: Communication and training about anti-corruption policies and procedures 205-3: Confirmed incidents of corruption and actions taken
2	GRI 301: Materials	301-1: Materials used by weight or volume
3	GRI 302: Energy	302-1: Energy consumption within the organisation 302-3: Energy intensity 302-4: Reduction of energy consumption
4	GRI 303: Water and Effluents	303-1: Interactions with water as a shared resource 303-2: Management of water discharge-related impacts 303-3: Water withdrawal 303-4: Water discharge 303-5: Water consumption
5	GRI 305: Emissions	305-1: Direct (Scope 1) GHG emissions 305-2: Energy indirect (Scope 2) GHG emissions 305-3: Other indirect (Scope 3) GHG emissions 305-4: GHG emissions intensity 305-5: Reduction of GHG emissions 305-6: Emissions of ozone-depleting substances (ODS)
6	GRI 306: Waste	306-1: Waste generation and significant waste-related impacts 306-2: Management of significant waste-related impacts 306-3: Waste generated 306-4: Waste diverted from disposal 306-5: Waste directed to disposal
7	GRI 308: Supplier Environmental Assessment	308-1: New suppliers that were screened using environmental criteria
8	GRI 401: Employment	401-1: New employee hires and employee turnover 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees 401-3: Parental leave

# **SUSTAINABILITY INTEGRATION**

No:	GRI Standard Topics/ General Disclosures	Topic Specific Disclosures
9	GRI 403: Occupational Health & Safety	403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation
	l reality of carety	403-3 Occupational health services
		403-4 Worker participation, consultation, and communication on occupational health and safety
		403-5 Worker training on occupational health and safety
		403-6 Promotion of worker health
		403-7 Prevention and mitigation of occupational health and safety impacts directly linked by
		business relationships
		403-8 Workers covered by an occupational health and safety management system
		403-9 Work-related injuries
10	GRI 404: Training	404-1 Average hours of training per year per employee
11	GRI 405: Diversity &	405-1: Diversity of governance bodies and employees
	Equal Opportunity	
12	GRI 406: Non-	406-1: Incidents of discrimination and corrective actions taken
	Discrimination	
13	GRI 407: Freedom of	407-1: Operations and suppliers in which the right to freedom of association and
	Association	collective bargaining may be at risk
14	GRI 409: Forced,	409-1: Operations and suppliers at significant risk for incidents of forced or compulsory
	Compulsory Labour	labour
15	GRI 416: Customer	416-2: Incidents of non-compliance concerning the health and safety impacts of products
	Health & Safety	and services
16	GRI 418: Customer	418-1: Substantiated complaints concerning breaches of customer privacy and losses of
	Privacy	customer data
17	GRI 419: Socioeconomic	419-1: Non-compliance with laws and regulations in the social and economic area
	Compliance	

# **MATERIALITY MATRIX**

# **Materiality Assessment - Group**



The high impact topics in the materiality scatter plot have been identified as material topics to the organisation. The identified topics have been highlighted in the above graph for reference.

The following section summarizes SAGTs disclosure management approach (DMA) for Economic contribution, Environmental Stewardship and Labour Practices and Social Responsibility. The DMA can be viewed online at https://d3bo42cmohq4cn.cloudfront.net/2021/12/SAGT-DMA-Reportlatest-3.pdf.

# RESPONSIBLE ECONOMIC CONTRIBUTION

SAGT strives to be the benchmark influencer in Sustainability within the industry and the region. The Company conducts all its business activities in a responsible manner, ensuring they remain in line with the highest standards of ethics and integrity at all times.

SAGT remains committed towards delivering sustainable performance and growth across all its stakeholder groups, while ensuring compliance with relevant anti-corruption legislation, reinforced by its anti-corruption policy that serves as the overarching ethos for its activities.

The company ensures that all concerns raised with respect to legal and ethical violations are addressed in an impartial manner through a strongly enforced whistleblowing policy that is outlined within the Code of Conduct for employees and overseen by an independent Ombudsperson.

A comprehensive disclosure of SAGT's Corporate Governance framework and practices can be found on pages 18-21 of this report.

# **ENVIRONMENT STEWARDSHIP**

During the reporting year, SAGT focused on Decarbonisation and digitisation to minimise its carbon footprint and improve operational efficiencies. The Company also ensures its operations conform to the environmental regulations stipulated by the Central Environmental Authority and the Marine Pollution Prevention Authority.

SAGT recognises that its consumption of non-renewable fossil fuels is responsible for air pollutants and

greenhouse gas (GHG) emissions, and considers this to be its most significant environmental impact. The GHG emissions resulting from SAGT's terminal operations are primarily attributable to its trucking and machinery operations. AGT's strategy of energy conservation, hybrid conversion of RTGs, equipment electrification and renewable energy generation are further described in the section environmental stewardship. Additionally, the company considers water consumption, the generation of hazardous and non-hazardous waste and the segregation and treatment of effluents to be material to its operations. Therefore, the company has established the following policies to mitigate and minimise the aforementioned impacts.

### **Energy & Emissions Policy**

To adopt green practices, engage in new investments, deploy energy efficient equipment and initiate behavioural changes designed to minimise the Company's overall energy and carbon footprint, ensuring that impacts of climate change are addressed and mitigated through business continuity plans, disaster recovery plans and relevant insurance covers that offer protection against business interruption and worker health and safety.

# Water Management Policy

To reduce the use and withdrawal of blue water sources, and minimise the water discharged to the environment through recycling and reusing initiatives where possible, while ensuring that the quality of water discharged is in alignment with Sri Lankan legislation and regulations.

# Waste Management Policy

To ensure that all regulatory requirements are adhered to in terms of the disposal of hazardous and non-hazardous waste, ensuring segregation discipline is entrenched within SAGT's operations, while promoting waste reduction and engaging in the reuse and recycling of generated waste through accredited third-party waste disposal contractors

# LABOUR PRACTICES AND SOCIAL RESPONSIBILITY

Being a labour-intensive industry, the Company's employees and workforce remain at the core of SAGT's business success. This year in particular, the company focused on diversity, equality and inclusion with a specific focus on expanding opportunities for women in the industry. In 2024 SAGT implemented a policy on paternity leave which enables and empowers mothers to return to work while giving fathers the opportunity to be more involved with their newborn.

SAGT prioritises fostering a conducive work environment within which employees are offered opportunities to grow and thrive, with equal opportunities for recruitment, selection and progress regardless of race, gender, nationality, religion, or any other status protected by law. A safe and secure working environment that is wholly focused on safeguarding the human rights of its workforce is available within the company, while every employee is able to earn a fair, equitable income, while driving skill development to ensure career advancement in their field of choice. All employment-related legislation is adhered to, while SAGT seeks to continuously improve and develop upon these recruitment and selection practices by integrating new ideas and approaches to achieve industry and global best practices.

SAGT's training and development programmes empower employees through the development of individual technical and soft skills that aid in the achievement of individual and organisational objectives.

The organisation's inclusive approach is underscored by SAGT's key priority to provide a safe and secure environment free from discrimination and any form of harassment. To this effect, the company maintains a zero-tolerance policy for any form of sexual harassment in the workplace, with all allegations in this regard treated in the utmost confidence and with respect. The company has all the necessary measures in place to ensure

# **SUSTAINABILITY INTEGRATION**

no individual will be victimised for lodging a complaint of this nature. All complaints are promptly investigated and addressed in accordance with the processes detailed within the company's policy against sexual harassment. Any person deemed guilty is subject to disciplinary action, with implications ranging up to and including dismissal from employment.

Additionally, no employee is forced to work against their will, and is not required to engage in bonded/forced labour, nor are they subject to corporal punishment or coercion of any kind within the workplace.

Internally developed SOPs, guidelines, procedures and precautionary measures ensure that SAGT is able to uphold the health and safety of its stakeholders, including employees, subcontractors, clients, customers, and agents, in addition to the shipping lines that access its terminal premises.

These procedures and measures are built on the premise of proactive risk management, continuous quality improvement and contingency planning, thereby ensuring operations at the terminal are conducted in accordance with the highest safety standards to minimise avoidable injuries and mitigate the risk of occupational illnesses.

All employees are required to adhere to these SOPs without exception, and all third parties visiting the terminal must adhere to the company's health and safety policy.

SAGT is committed to projects aimed at uplifting local communities through dedicated programmes that promote gender equality and the empowerment of women, while engaging in partnerships with a range of local and international non- government organisations (NGOs) and government organisations, and sponsorships of

academic projects, further supported by voluntary employee initiatives.

# SAGT's Commitment to the SDGs

As a firm advocate of sustainability across all aspects of its operations, SAGT contributes towards the Sustainable Development Goals (SDGs) approved by the UN in 2015. These SDGs were designed as a roadmap to build a better and more sustainable future by 2030, by addressing the world's most pressing economic, social and environmental issues. SAGTs alignment to the SDGs can be seen throughout the report through the placement of the SDG icons at relevant points in the content as well as the GRI Content Index found on pages 76-80.



Sustainability in Every Move



# **OPERATIONAL REVIEW**

# **OPERATING CONTEXT:**

As a vital link in maritime trade, container terminals contribute to economic development and global commerce efficiency. Sri Lanka's strategic geographical positioning in the Indian Ocean astride the main East West Sea Route enables the Country to operate as a key transshipment hub in the region. Sri Lanka's strategic geographic positioning also provides significant advantages for global trade and connectivity. Its proximity to some of the world's fastest-growing trading economies in the region and fast and efficient sea route access to the Middle East and Europe, further bolsters its position as a transshipment hub. Moreover, Sri Lanka's deepdraft terminals are equipped to accommodate post-Panamax and Triple E-class vessels, reinforcing its capacity to support the evolving demands of sustainable and efficient global shipping.

Currently housing five container terminals including three deep draft terminals, the upcoming developments and additional capacity is expected to expand the Port of Colombo's (PoC) value proposition to its customers.

As a transshipment hub, PoC remains largely unaffected by the prevailing impacts of Sri Lanka's economic crisis. Its performance is primarily influenced by global trade dynamics and geopolitical factors. During the year, container shipping saw an uptick as the industry saw new capacity ordered in the post Covid era come on stream. Further, the red sea crisis, forcing vessels to divert around the Cape of Good Hope continued to drive container traffic to PoC

In 2024, PoC handled 7.78 million TEU's, marking the highest volume ever recorded in a calendar year, with a growth of 12% over 2023. Of the total volume, transshipment Cargo accounted for 85%. Further, during the financial year 2024/25 the Port of Colombo handled a total of 7.7 million TELI's

The South Asian region, particularly India, has seen a notable rise in maritime trade. As India strives to position itself as a global manufacturing hub, the Indian

government has prioritised enhancement of its port infrastructure, including the development of a deep-draft transshipment hub. This aligns PoCs growth aspirations, as a significant portion of its transshipment cargo comes from India, further strengthening PoC's position in the region.

# PORT OF COLOMBO IN 2024:

- Ranked amongst the top 30 ports globally in terms of throughput, in Alphaliner rankings
- Ranked 10th in the Drewry
   Connectivity Index in terms of reach
   and connectivity

The global maritime industry is undergoing transformation through technological advancements while prioritising sustainability. Innovations in artificial intelligence, automation, and digitalisation are enhancing operational efficiency and ensuring seamless connectivity within global supply chains. Simultaneously, the industry continues to invest in areas such as alternative fuels, renewable energy, and electrification to align with IMO-mandated net-zero targets, driving the transition toward a more sustainable and resilient maritime sector.

SAGT reached a milestone of 2 million TEUs in 2024 against a design capacity of 1.1 million TEUs. This was a 15% increase in comparison to the 1.7 million TEUs handled in 2023. In its 25-year history, SAGT has twice before reached the two million mark in a calendar year in 2018 and 2019, but this is the first time since postpandemic and Sri Lanka's economic crisis, highlighting the company's resilience and operational strength. The Company accounted for 26% of the PoC's throughput in 2024.

SAGT also surpassed the 2 million TEU milestone during the reporting period (1st April 2024 to 31st March 2025) further highlighting its operational capability and efficiency. In comparison SAGT handled 1.8 million TEU's in 2023/24.

Keeping in line with global industry trends, digitalisation and decarbonisation continued to be key strategic imperatives for SAGT.



Sri Lanka's strategic geographic positioning also provides significant advantages for global trade and connectivity.

SAGT is actively working on implementing a Vehicle Booking System (VBS) for trucks. This system allows terminals to set quotas and time slots for gate transactions optimising container drop-off and pick-up throughout the day. Additionally, a mobile app targeting truck drivers will provide features such as tracking container status, receiving updates on congestion, navigation, and other crucial port-related information. The VBS system promises several benefits, including improved management of incoming and outgoing volumes, optimal truck turnaround times, higher throughput and efficiency at truck gates, reduced "empty" trips for truck drivers, better time management, and enhanced data accuracy. The mobile app will give truck drivers a comprehensive overview of their appointments and container status, simplifying the process.

During the reporting period, the Company also completed the implementation of its digital safety management system enabling the organisation to consolidate its safety related processes, permits, data, knowledge sharing etc. onto a single platform.

### OPERATIONAL EXCELLENCE

2 million TEU's achieved in 2024/25 against a design capacity of 1.1 million TEUs

26% market share in the Port of Colombo

# TERMINAL DECARBONISATION

6 RTG's converted to hybrids reducing fuel consumption by 50% per machine

Renewable Energy generation -

460kWh solar system installed

### **CONTINUOUS IMPROVEMENT**

Adopting LEAN principles to further strengthen our commitment to innovation, continuous improvement and employee driven process improvements.

### **GENDER EQUALITY**

Achieving groundbreaking progress by obtaining approval to integrate females into night shift roles for the first time

# 12 females

integrated into select night shift roles in the operations department

# **Digitisation and Automation**

Introduced a Digital Safety Management System, consolidating all safety procedures into a single platform

Commencing infrastructure development of automation of gate and quay side operations through Optical Character Recognition (OCR) technology

SAGT also made progress in its decarbonisation objectives, aligning with the IMO's 2025 net-zero target. In 2024/25, SAGT retrofitted an additional six Rubber-Tyred Gantry (RTG) cranes with hybrid technology. Each hybrid RTG achieves approximately 50% fuel savings compared to conventional dieselpowered units. As of the end of the reporting period, 28 out of SAGT's 31 RTGs have been converted to hybrid systems, with plans in place to retrofit the remaining three cranes in the upcoming financial year. During the period under review, SAGT completed installation of a 460kW solar array on the rooftops of its administration buildings. The solar array once operational will generate 5% of SAGT's current annual usage. The Company is also looking at the installation of solar panels on the rooftops of its gatehouses to maximise generation of renewable energy on site and create a concept of renewable energy powered "green gates". SAGT will also be investing in electrical vehicles during the next financial year to contribute towards decarbonising its operations.

SAGT's efficiency targets also led to the adoption of LEAN management principles under the guidance of the LEAN Academy of APM Terminals. The Company provided comprehensive Kaizen training to employees, reinforcing its commitment to fostering innovation and continuous improvement.

Through this training, participants gained valuable knowledge of LEAN methodologies, essential tools, and practical problem-solving techniques that empowered them to implement LEAN practices in their daily tasks.

Looking ahead to 2025, SAGT will continue to train employees in LEAN management to foster a lasting culture of continuous improvement and has already initiated several Kaizen projects focused on operational efficiency and driving impactful, sustainable improvements.

In recent years, the company has actively encouraged women to take on roles traditionally performed by men, challenging industry stereotypes. Today, women are employed across all departments, continuing this progressive path. In 2024 SAGT made significant progress towards equal opportunity in the Port by obtaining approval from government regulatory authorities to integrate females into select shift-based roles in its operations department. Information on gender equality and other positive social impacts can be found in the Labour Practices and Social Responsibility section on pages 54-70.



Infrastructure development for gate automation

# **ENVIRONMENTAL STEWARDSHIP**

SAGT is conscious of the environmental impact of its operations. As a container terminal forming the link between sea and land transport, the Company is firmly committed to contributing towards the Maritime Industry's transition towards sustainability.

A comprehensive materiality assessment has identified key focus areas under the Company's environmental stewardship pillar within its sustainability strategy. As such the Company has in place multiple environmental policies under its overarching Sustainability Policy. These policies address critical areas such as water management, waste management, energy and emissions management, and management of effluents. Through these measures, SAGT strives to reduce resource consumption, improve efficiency, and integrate circular economy principles into its operations.

SAGT remains focused on optimising water usage through conservation initiatives and efficiency improvements, ensuring responsible consumption of this vital resource. Waste management efforts emphasise reducing waste generation, adopting circularity processes, and ensuring responsible disposal methods. The Company also continues to enhance energy efficiency and reduce greenhouse gas emissions by implementing green technologies and operational best practices, contributing towards mitigating the impacts of climate change.

Through its Sustainability Management Framework, SAGT remains dedicated to integrating sustainable practices across all aspects of its operations, reinforcing its commitment to environmental responsibility and long-term resilience.

The following topics are key focus areas within SAGTs environmental stewardship pillar and are addressed within its Sustainability Management Framework.



Materials Usage (GRI 301-1)



**Energy Consumption (GRI 302-1)** 



Water Consumption (GRI 303-1,303-3,303-5)



Carbon Emissions (GRI 305-1, 305-2)



Waste Generation (GRI306-1, 306-2, 306-3)



Effluent Discharge GRI 303-2,303-4

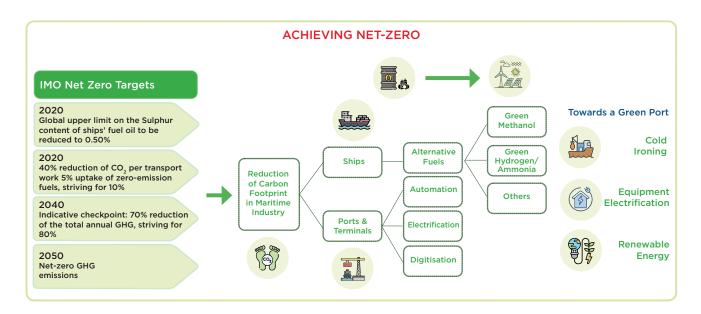
# Climate Change

Global warming, driven by increased greenhouse gas (GHG) emissions, is becoming an ever-growing threat. 2024 has been recorded as the hottest year in history with extreme weather events impacting many livelihoods around the world. The maritime industry, as a significant contributor to global emissions, has recognised the urgent need to address the impacts of rising temperatures and shifting weather patterns. These changes affect shipping operations, port infrastructure, and marine ecosystems, highlighting the importance of building climate resilience. In response, the industry and regulatory bodies are working together to implement policies aimed at mitigating the industry's impact. At the same time, ports and shipping companies are exploring and adopting more sustainable practices, such as transitioning to low-emission fuels, improving fuel efficiency, and embracing greener technologies to reduce their carbon footprint and navigate the challenges of climate change.

SAGT remains at the forefront of decarbonisation efforts at the Port of Colombo (PoC) and across the region. The Company continues to implement initiatives such as hybrid technology, renewable energy and digitisation and automation to decarbonise its operations and ensure long term business sustainability. SAGT continues to work towards achieving net zero emissions and contribute towards the decarbonisation of the maritime industry.



6 RTGs hybridised during the reporting period



# **Assessment Methodologies**

SAGT utilises a spreadsheet-based software tool, the Sustainability Performance Analyser (SPA), to facilitate comprehensive data collection, enhance trend visibility, and support both internal and external reporting. The tool is used to gather and assess data related to the Company's sustainability and risk performance indicators. Data is

collected periodically and undergoes both internal and external audits to ensure accuracy, followed by comparative analysis, management reviews, and informed decisionmaking.

The Sustainability Division collaborates with various departments to obtain this data. Following a monthly performance review, the management

identifies areas for improvement and recommends corrective actions or initiatives as needed. All sustainability-related data is collected in adherence to a Standard Operating Procedure (SOP) to maintain precision and accuracy.



# **ENVIRONMENTAL STEWARDSHIP**

# Stakeholder Engagement

SAGT continues to engage with all significant stakeholders that have the ability to impact, and that are impacted by the Company's business operations. As such SAGT has multiple mechanisms in place to allow stakeholders to voice grievances and highlight potential environmental concerns arising from terminal activities. The company continues to maintain close relations with regulatory bodies such as Central Environmental Authority (CEA), Marine Pollution Prevention Authority (MPPA) and the Marine Environmental Protection Authority (MEPA) to ensure that the company at a minimum complies with regulatory requirements. SAGT also partners with environmental conservation subject experts such as the Centre for Sustainability of the University of Sri Jayewardenepura to execute reforestation and conservation initiatives.

Similarly, employee feedback on related issues is actively encouraged through various channels, including trade unions, the organisational hierarchy, surveys and interviews, suggestion boxes, and intranet.

### MATERIALS USAGE AT SAGT

GRI 301-1 MATERIALS USED BY WEIGHT OR VOLUME

# MANAGEMENT DIRECTION

SAGT is dedicated to minimising the use of non-recyclable materials in its operations and upholding the principles of the 3Rs—Reduce, Reuse, and Recycle—whenever practical and feasible. The Company's material usage is carefully aligned with operational needs, following the maintenance schedule for the respective financial year.

At a minimum, SAGT adheres to the safety standards specified by the original equipment manufacturers (OEM's). The Company has an updated maintenance schedule in place for all its significant equipment thereby ensuring optimal performance and efficiency throughout their operational life span. Additionally, SAGT's Sustainability Performance Management System plays a key role in monitoring material consumption, allowing the Company to swiftly identify and address any significant changes or anomalies.

# Impacted SDG's









Non-renewable materials used by weight or volume	2024/25	2023/24	% Difference
RTG Tyres in kg	24,180	24,360	-1%
PM Tyres in kg	46,320	37,680	23%
Lubricants in Litres	66,439	50,074	33%
Rope in Kg	111,003	77,071	44%
Paper in kg	2,405	2,863	-16%

A4 paper usage reduced by 16% in comparison to 2023/24, reflecting the continued impact of the behavioural and process changes implemented in 2022/23. During the year, a cross-functional team was formed with the goal of further reducing paper consumption across the organisation. The Team raised awareness amongst its employees on the importance of minimising paper usage and identified areas of increased paper usage and is actively working

on strategies to further reduce consumption. With the upcoming implementation of gate and quayside automation, paper usage is expected to decline even further.

All materials used by SAGT are finished goods sourced from external manufacturers and are considered non-renewable in nature. The Company has implemented several initiatives to reduce and reuse these materials where possible. In line with OEM maintenance guidelines, materials used for machine upkeep are managed to ensure optimal equipment efficiency. Additionally, a tyre management process was introduced during the previous reporting period to increase the lifetime of Prime Mover (PM) tyres. Tyre tread depth is monitored continuously and removed before complete wear. These tyres are then re-treaded and re-installed on PMs and terminal trailers. However, the consumption of PM tyres increased by 23% in 2024/25, primarily due to a 20% rise in PM operating hours compared to 2023/24. This increase was driven by higher container volumes handled at the terminal, resulting in extended equipment usage and contributing to the elevated tyre consumption.

SAGT conducts machine maintenance in alignment with the running hours of the equipment. Due to the increase in container volumes handled in 2024/25 compared to 2023/24, equipment utilisation has risen, resulting in a 33% increase in the use of lubricants for machine maintenance. Similarly, rope changes are carried out according to the OEM guidelines, based on a schedule which is based on the actual move count of the machine. During the year rope usage increased by 44% in comparison 2023/24.

# PAPER SAVING (2024/25 VS 2023/24)

16%

16% Reduction

Troos saved

### **ENERGY**

### GRI 302-1: ENERGY AND EMISSIONS MANAGEMENT

**GRI 302-3: ENERGY INTENSITY** 

Total Power Consumed in Giga Joules (GJ)	2024/25	2023/24	% Difference
Diesel	182,196	148,472	23%
Petrol	11	10	13%
LPG	1,141	1,091	5%
Total Indirect Energy - from the National Grid	37,299	35,126	6%
Indirect Energy - from the National Grid (non-renewable energy sources)	18,649.5	17,563	36%
Indirect Energy - from the National Grid (renewable energy sources)	18,649.5	17,563	-27%
Total energy intensity per box move	0.170	0.169	1%

In the 2024/25 period, a total of 5,044,180 litres of diesel was consumed, a 23% increase compared to 2023/24. Overall, the increase in diesel consumption was influenced by higher container volumes and the resultant increase in equipment usage.

# BREAKDOWN OF DIESEL USAGE BY EQUIPMENT (2024/25)



**Rubber Tyred Gantry Cranes** 



Movers



Inter Terminal Transfer Truck

Fleet

Reach Stackers, Forklifts, Yard Vehicles and other uses

RTG diesel consumption saw a 30% increase compared to the previous year, driven by a 22% increase in RTG box moves due to higher container volumes handled by the terminal. Since 2022/23 SAGT has been prioritising the use of hybrid RTGs for operations to drive down diesel consumption. Therefore, hybrid RTGs were utilised at maximum capacity in 2022/23 and 2023/24. However, due to the increased volumes handled in 2024/25 the fleet of non-hybrid RTGs were utilised for operations. Therefore, RTG diesel consumption per RTG move increased by 6% in 2024/25 in comparison to 2023/24. The hybrid conversion of Rubber-Tyred Gantry (RTG) cranes resulted in a 52% improvement in diesel consumption efficiency during the reporting period. On average, hybrid RTGs

# EFFICIENCY GAINS FROM THE HYBRID CONVERSION OF RTGS

in RTG Diesel

**Efficiency** 



Non-Hybrid RTG



**Hybrid RTG** 

consumed 0.73 litres of diesel per move, compared to 1.52 litres per move by non-hybrid RTGs. This significant reduction highlights the positive environmental impact of SAGT's transition to energy-efficient technologies.

With the hybrid conversion of 6 more RTGs during the third and fourth quarters of 2024/25, the number of hybrid RTGs increased from the previous 22 to 28.

Prime Movers (PMs) consumed 2,030,256 litres of diesel during the year, reflecting a 28% increase compared to 2023/24. Additionally, PM diesel consumption per running hour increased by 6%. This can primarily be attributed to increased machine idle time during operations due to yard congestion. Increased vessel diversions to PoC due to the Red Sea Crisis contributed to yard congestion during the period. As a result, yard operations slowed down resulting in increased idle time of the Prime Movers in the yard during operations.

Diesel consumption by SAGT's ITT fleet increased by 1% compared to the previous year. This can be attributed to the increase in the number of trips performed by the machines due to the increase in volumes during 2024/25.

# LPG Consumption:

LPG consumption in the Company's kitchen increased by 5% in 2024/25, rising from 23,063 kg in 2023/24 to 24,113 kg. This increase was primarily due to two factors: a shift toward increasing cooking time for meat items, which required higher LPG usage, and a temporary breakdown of certain electric cooking equipment, resulting in increased reliance on LPG during that period.

### **Electricity Consumption:**

SAGT's total electricity consumption from the national grid in 2024/25 was 10,360,817 kWh, which is a 6% increase from 2023/24. This increase is primarily attributable to the 18% increase in QC moves in comparison to the previous year due to the increase in volume handled at the terminal.

# **ENVIRONMENTAL STEWARDSHIP**

# Breakdown of Electricity Usage:

Total Electricity Consumption (kWh)	Consumption in 2024/25	Consumption in 2023/24	% Difference
Quay Cranes	6,982,830	6,416,946	9%
Engineering Workshops, Main Office Building, Yard Lighting, Staff and Administration Areas	3,377,987	3,340,179	1%
Total	10,360,817	9,757,125	6%

67% of this electricity was consumed by Quay Cranes (QCs) whilst the remaining electricity was used by various other facilities, including the Engineering Workshops, Main Office Building, Yard Lighting, and Staff & Administration Areas.

Quay Crane (QC) moves increased by 18% in 2024/25, leading to a 9% rise in overall electricity consumption compared to 2023/24. Despite this increase, the QC electricity intensity factor improved by 8%, driven by reduced machine idle time and higher operational throughput. The Company continued to enhance energy efficiency through effective planning including the optimised deployment of five twin-lift cranes.

During the reporting period, the electricity used by reefer containers increased by 32%, totalling 8,082,200 kWh. This increase is attributable to the overall increase in volume handled at the terminal in comparison to the previous year. The electricity

consumed by reefers is excluded from the Company's total electricity consumption and Scope 2 emissions. as it is considered a pass through paid for by the shipping lines. Therefore, emissions from reefer containers are included in the Company's Scope 3 emissions. Emissions as a result of electricity consumption from the national grid is considered a relatively low GHG emission source due to the national grid of Sri Lanka being partially hydropowered, in contrast to other countries depending solely on fossil fuel combustion for electricity generation. As per data obtained from the Ceylon Electricity Board, renewable energy contributes towards 50% of the nation's grid electricity\*.



Reducing the carbon footprint from terminal operations remains a key priority within SAGT's internal sustainability targets.

https://ceb.lk/publication-media/statistical-reports/en

GRI 305-1: DIRECT (SCOPE 1) GHG EMISSIONS

GRI 305-2: ENERGY INDIRECT (SCOPE 2) GHG EMISSIONS 305-3: OTHER INDIRECT (SCOPE 3) GHG EMISSIONS

305-5: REDUCTION OF GHG EMISSIONS

### **Management Direction**

Reducing the carbon footprint from terminal operations remains a key priority within SAGT's internal sustainability targets. The Company's Energy and Emissions Policy is structured around a two-pronged approach— decarbonisation and energy conservation—aimed at reducing operational costs while minimising environmental impact and contributing to climate change mitigation.

As part of this commitment, SAGT continuously monitors its energy consumption and emissions through a combination of digital and analogue metering, with calculations based on recorded data. The Company adheres to the Greenhouse Gas (GHG) Protocol established by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD) as the basis for measuring carbon emissions. Additionally, carbon footprint calculations follow IPCC guidelines for national greenhouse gas inventories, as published by the Institute for Global Environmental Strategies (IGES). The grid emission factor has been obtained from the 2022 Sri Lanka Energy Balance Report published by the Sustainable Energy Authority of Sri Lanka.

To assess efficiency, SAGT measures its carbon intensity using the total number of containers handled during the year as a denominator, comparing it against the previous financial year's performance. This evaluation ensures alignment with the Company's sustainability strategy, to contribute to the achievement of key UN Sustainable Development Goals (SDGs).

# Impacted SDG's







Carbon Footprint by Energy Type	2024/25 (MTCO <sub>2</sub> eq)	2023/24 (MTCO <sub>2</sub> eq)	% Difference
Diesel *	13,547	11,039	23%
Petrol	0.8	0.7	14%
LPG	72	69	4%
Emissions from refrigerant and fire extinguishers	641	382	68%
Electricity**	4,209	3,963	6%
Total	18,469	15,454	20%

SAGT's Carbon footprint comprises the emissions of the entire terminal due to operations within management control. The Carbon footprint is a function of the consumption of diesel (73%), electricity from the national grid (23%), LPG gas (0.4%), petrol (0.004%) and refrigerant gases (3%). The Carbon Footprint Calculation incorporates the gross emission factors of all greenhouse gases (GHGs), ensuring a comprehensive CO2 equivalent (CO2eq) measurement in metric tons (MT) for Scope 1, 2, and 3 emissions. Additionally, SAGT does not utilise any energy sources or combustion processes that result in biogenic emissions. SAGT commenced the calculation of its carbon footprint in FY 2019/20 following the implementation of its Sustainability Management Framework

SAGT's total carbon footprint for 2024/25 (Scope 1 and 2 emissions) was 18,469 MTCO2eq, representing a 20% increase compared to the previous year. Scope 1 (direct emissions) accounted for 14,261 MTCO2eq, a 24% increase. Scope 2 (indirect emissions from electricity consumption) totalled 4,209 MTCO2eq, reflecting a 6% increase. The increase in emissions was driven by a 14% rise in volumes handled at the terminal compared to the previous year.

Sri Lanka's electricity generation relies significantly on hydropower, contributing to a lower Carbon footprint compared to countries that depend solely on fossil fuels for electricity production. According to data published by the Ceylon Electricity Board (CEB), 50% of the energy used in Sri Lanka comes from renewable sources (https://ceb.lk/publication-media/statistical-reports/en) This benefits SAGT's Scope 2 emissions,

as a portion of its electricity is sourced from renewable energy.

SAGT utilises refrigerant gases in the Company's air conditioning units.
Consumption is based on the arising maintenance requirements. In the 2024/25, SAGT's refrigerant gas usage resulted in total emissions of 640 MTCO2eq, based on the global warming

potential (GWP) of each refrigerant type. This is a 75% increase in comparison to the previous year. The increase is primarily due to the installation of air conditioning units in temporary workspaces due to ongoing building refurbishment as well as planned maintenance of air conditioning units in the administration building. During the reporting period, SAGT utilised 54 kg of R-22 refrigerant which amounts to 3kg of CFC-11 equivalent. Currently, the Company only employs R-22 refrigerant gas with a CFC-11 equivalent factor. The air conditioning units which utilise the R-22 gas are currently being phased out with the ongoing building refurbishments which are expected to be completed over the next few years.

Carbon Footprint of refrigerant refilled (by gases)	2024/25 (MTCO <sub>2</sub> eq)	2023/24 (MTCO <sub>2</sub> eq)	% Difference
R22	106.6	186.6	-43%
R32	130.7	95.8	36%
R407C	55.1	55.1	0%
R410A	347.9	43.5	700%
Total	640	381	68%

SAGTs carbon footprint per box move has increased by a marginal 1% in 2024/25 in comparison to 2023/24. This is primarily attributable to the increased use of non-hybrid RTGs due to the 14% increase in volumes handled. However, SAGT's Carbon Footprint per Box Move reduced by 22% in 2024/25 in comparison to 2020/21. This is primarily attributable to the conversion of 22 RTGs to Hybrids. A further 6 RTGs were converted to hybrid technology during the 3rd and 4th quarters of the period under review bringing the total number of hybrid RTGs to 28. Further, the Company prioritised the use of twin lift Quay Cranes to maximise efficiency of quay side operations.

# Breakdown of Carbon Footprint by Equipment

During the year the carbon intensity (carbon footprint per RTG move) of SAGTs RTG fleet increased by 6%. Due to the increase in volumes during the year, the Company utilised the fleet of RTGs that were not hybridised to meet operational demands thus increasing the emission intensity of the fleet in comparison to the previous year. Further, there was a 6% increase in the carbon intensity (carbon footprint per PM operating hour) of the Prime Mover fleet attributable to increased yard volumes during the period leading to congestion and higher machine idle times.

To further reduce emissions, SAGT will be investing in electric equipment, to reduce dependence on fossil fuels. The investments include 30 electric Prime Movers and 2 electric forklifts to be purchased in 2025/26.

To harness renewable energy sources, the Company installed an array of solar panels on the rooftop of its administration building. Once operational, approximately 5% of its annual energy usage will be sourced from renewable energy. To maximise energy generation from renewable sources, the Company is looking to invest in installing solar panels on the other available rooftop areas such as its gate houses.

<sup>\*</sup> Scope 1 GHG emissions for FY 2023/24 has been restated to include methane ( $CH_2$ ) and nitrous oxide ( $N_2O$ ) components, which were not accounted for in previous years. Further emissions from fire extinguishers and wider diesel consumption points have been included for greater accuracy.

<sup>\*\*</sup> Scope 2 carbon footprint has been restated to reflect the Average Emission Factor published by the Sustainable Energy Authority of Sri Lanka to ensure greater accuracy.

# **ENVIRONMENTAL STEWARDSHIP**

The carbon footprint per TEU of SAGTs ITT fleet has reduced by 11% in 2024/25 in comparison to the previous year. During the reporting period there was an increase in total number of TEUs handled by the ITT fleet in comparison to the previous year.

SAGT's Scope 3 Emissions (which consists of electricity consumed by Reefer containers) were 3,283 MT CO<sub>2</sub>eq. This emission category is currently under review, with plans to include more relevant categories in future reports, to provide a more comprehensive estimate of the Company's total Scope 3 emissions.

The Company's Environmental Protection License (EPL) issued by the Central Environmental Authority of Sri Lanka, mandates the monitoring of NOx and SOx emissions from RTGs and diesel generators. To meet this requirement, SAGT uses an independent third-party for annual testing.

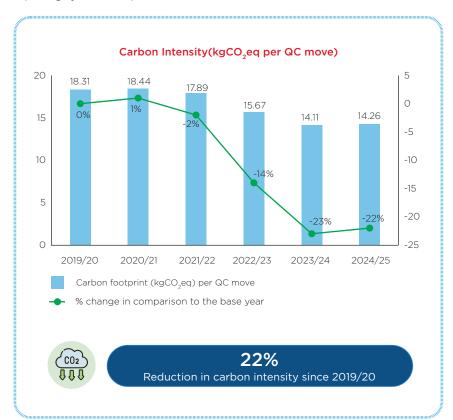
As of 31st March 2025, SAGT's NOx and SOx emissions were within the regulatory quality levels, and no violations were recorded during the year.

To continue reducing the carbon intensity of its operations, the Company is actively working towards adopting hybrid and electric technologies, advancing digitalisation and automation efforts, integrating artificial intelligence and harnessing non-renewable energy sources.

In addition to its decarbonisation initiatives. SAGT will continue to leverage technology to further reduce fuel consumption. The Vehicle Booking System for trucks, scheduled to be launched in 2025, will optimise logistics for customers, including truckers, the export community, and Inter Terminal Transfer (ITT) service providers; thereby enabling the Company to reduce its Scope 3 Carbon footprint. SAGT also continues to enhance operational efficiency through advanced yard and vessel planning, utilising technologies such as Navis and Prime Route to streamline processes and reduce fuel usage. The Company is also exploring. the use of driverless trucks within its terminal premises through artificial intelligence which will further optimise

operations and contribute to reduced resource consumption thus leading to fewer emissions.

The progression of SAGTs carbon footprint and carbon intensity over the past five reporting cycles are depicted below.



# Managing Risks and Opportunities of Climate Change

SAGT's decarbonisation efforts are driven by its commitment to align its operations with the International Maritime Organisation's targets to reduce Carbon emissions: 40% by 2030, advancing to 70% by 2040 and net Zero by 2050. SAGT is also focused on contributing to the United Nations Sustainability Development Goals

Having recognised climate change as a key factor impacting SAGT operations, the Company acknowledges both the risks and opportunities it presents. Accordingly, these risks are integrated into the Company's Sustainability agenda and assessed through the Enterprise Risk Management (ERM) register. Through this process, acute physical risks have been identified, and appropriate mitigation measures have been put in place.

The Company's location in the PoC exposes it to risks from both land

and sea. Risks related to the sea can be mitigated by the city's drainage infrastructure and timely information dissemination and evacuation protocols. Additionally, SAGT has in place a Business Continuity Plan, along with a comprehensive Disaster Recovery Plan, alongside health and safety processes and infrastructure to safeguard the terminal against physical risks.

To further safeguard its operations SAGT also holds comprehensive business interruption and workman's compensation insurance ensuring protection in the event of an acute physical risk arising during the transition to low carbon operations.

All new investments made towards transitioning to low carbon operations are evaluated based on both financial and non-financial criteria. The payback periods and Return on Investments are assessed prior to implementing transition strategies. During the period the Company invested 5.5 million USD for decarbonising operations for initiatives such as hybridisation, solar power, and electric vehicles.

# Partnering for Environmental Conservation

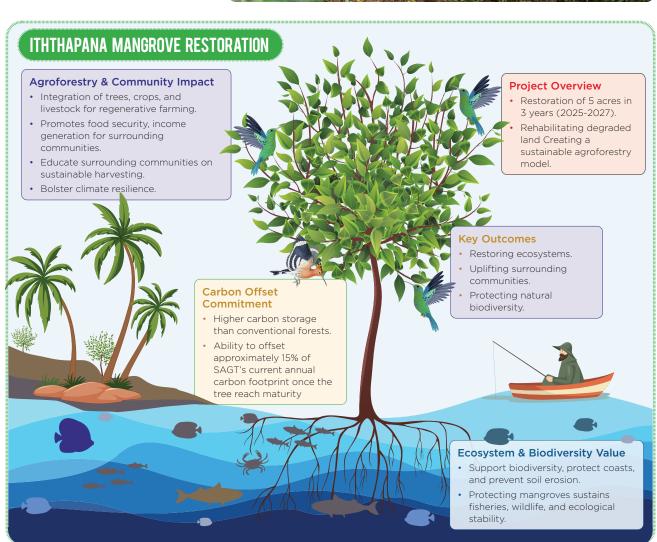
### **Environmental Restoration**

Since 2019, SAGT has partnered with the Department of Forestry and Environmental Science at the

Team SAGT volunteering at the Iththapana mangrove project site







# **ENVIRONMENTAL STEWARDSHIP**

University of Sri Jayewardenepura on a reforestation project at the Yagirala Forest Reserve. The initiative began with the reforestation of a 1-acre area. where around 700 saplings were planted with the active participation of Team SAGT and the local community. These saplings are monitored using GPS technology, allowing for realtime data collection. Building on this achievement, SAGT expanded its efforts in 2021 by committing to reforest an additional 4 acres, bringing the total area to 5 acres. This reforestation was maintained until 2024, with approximately 3,000 saplings planted in the land area.

Strengthening its partnership with the University of Sri Jayewardenepura, Centre for Sustainability (CFS) SAGT committed to restore 5 acres of mangroves in the Benthara River Mangrove Complex, located in the south of Sri Lanka. The project officially commenced in quarter 4 of the reporting year.

Coastal ecosystems, such as mangroves, seagrass, and salt marshes, serve as highly effective carbon sinks, capable of capturing and storing carbon at rates far surpassing inland forests, despite occupying smaller areas. These ecosystems sequester carbon in the plant's root systems, which remain stored underground for millions of years.

SAGT's collaboration with the CFS aims to restore and maintain a 5-acre area of the mangrove forest, which will help regenerate ecosystems, prevent land erosion, and provide a sustainable source of income for the local community. Additionally, this project will offset approximately 15% of SAGT's current annual Carbon footprint once the plants reach full maturity. In comparison, the reforestation of 5 acres at the Yagirala Forest Reserve offsets about 8% of the Company's Carbon footprint once the forest reaches full maturity.

As part of the project's first phase, 30 volunteers from Team SAGT participated in land clearing activities to support the restoration efforts.

Team SAGT volunteering at the Company's annual Beach Cleanup





# Contributing Towards Coastal and Ocean Health

Ocean health is increasingly threatened by human activities such as overfishing, climate change, pollution, and habitat destruction. Globally, an estimated 8 million tonnes of plastic enter the oceans each year, contributing significantly to the degradation of marine and coastal ecosystems. Currently, between 79 and 110 million tonnes of plastic are estimated to be in the world's oceans, with 80% of this pollution originating from land-based activities.

Coastal pollution in Sri Lanka is on the rise, fuelled by the growing urban population and the concentration of industries in coastal areas. In fact, Sri Lanka ranks as the fifth-largest contributor to global oceanic plastic waste.

The Maritime Industry, which handles 90% of global trade, is vital to the world's economy and heavily relies on oceanic resources. As a container terminal bridging sea and land

transport, SAGT depends on the health of the ocean for its operations. Therefore, it is crucial for SAGT to play an active role in preserving marine ecosystems.

SAGT's ongoing partnership with the Marine Environment Protection Authority (MEPA) enables the Company to raise awareness among employees and the wider community about the importance of reducing human activities that negatively impact ocean health.

In November 2024, SAGT organised a beach clean-up event where 104 employees volunteered, collecting 104 bags of trash. Additionally, in February 2025, SAGT supported MEPA's series of beach clean-up events, which were part of the Clean Sri Lanka initiative led by the Government of Sri Lanka. SAGT provided personal protective equipment (PPE) and refreshments to the participants at the beach cleanups. A group of SAGT employees volunteered at the inaugural beach clean-up event of the Clean Sri Lanka

initiative at the Crow Island Beach Park in Colombo, Sri Lanka.

SAGT maintains strong engagement with the following organisations to stay informed on environmental issues and proactively address any concerns related to its operations.

- Central Environmental Authority (CEA)
- Sri Lanka ports Authority (SLPA)
- The Maritime Environment Protection Authority (MEPA)

### Management of Water & Effluents

Freshwater is a vital natural resource essential for human survival. However, the growing impacts of climate change and increasing water consumption are projected to result in nearly two-thirds of the world's population experiencing water shortages within the next two years. Sri Lanka ranks high on the Global Climate Risk Index, particularly in relation to climate change-induced water risks. In response, industries and corporate entities are prioritising sustainable water and effluent management as a key component of their sustainability strategies.

# GRI 303-1: INTERACTIONS WITH WATER AS A SHARED RESOURCE: Management Direction

SAGT does not operate in a water intensive industry. However, the Company considers the efficient management of water consumption as a high priority. SAGT's water is sourced from the supply of the National Water Supply and Drainage Board's (NWSDB) supply to the Port of Colombo.

SAGT has in place a Water Management policy to ensure that water withdrawn from blue water and gray water sources are used with maximum efficiency. The policy is supported by initiatives aimed at reducing consumption, reusing and recycling wherever possible. Additionally, the Company is currently in the process of establishing water usage reduction targets to gradually achieve notable reductions in blue water withdrawal.

The Company monitors its water consumption mainly through water flow meters. At locations where meters are not available, consumption is measured using estimates based on pump operating time. Flow meters are installed at significant usage points to measure and regulate the extent of water consumption within the Company. These points include the Company's kitchen and canteen, staff restrooms, contractor restrooms, vehicle wash bay and administrative office. Usage is monitored monthly and any deviations from the norm are reviewed and addressed each month.

SAGT's operations are located in the city of Colombo where there is no water scarcity and is not identified as a "water stressed" area. However, the Company stays mindful that many regions outside the Western Province face water scarcity due to droughts and extreme weather patterns.



# GRI 303-2 MANAGEMENT OF WATER DISCHARGE AND RELATED IMPACTS

SAGT ensures that its effluent discharge is within quality levels mandated by the Central Environmental Authority (CEA) of Sri Lanka. SAGT's efforts towards this end enables it to earn the Environment Protection License (EPL) issued by the CEA and renewed each year. The license serves as the basic requirement that drives SAGT's efforts to manage its water discharge.

The Company follows a strict policy of treating all water utilised in the canteen, staff washrooms and for equipment washing and cleaning activities. The recycling process involves several key steps and starts with Oil-Water Separation, where water from various activities first passes through an oil-water separator to remove any oils and greases. After the initial separation, the water is then channelled to an on-site sewerage treatment plant (STP) where further treatment takes place.

The output from the STP is discharged to the municipal council drainage

system. The STP output is monitored and tested periodically by an independent third party, to ensure that the quality of the discharged water meets the standards required for the EPL. During the 2024/25 period, all effluent discharged, were confirmed to comply with the EPL standards, and no violations were reported. SAGT continues to uphold its commitment to environmentally responsible water discharge management and strives to minimise its environmental impact through ongoing compliance and continuous improvement efforts.

Plans are in place to upgrade SAGTs Effluent Treatment Plant (ETP) to enable further reduction freshwater withdrawal for terminal activities. The plant will have the capability of generating 60m³ of water per day. Based on the daily average use this amounts to approximately 42% of the Company's current daily usage. Treated effluent will be used for selected activities such as flushing and machine-washing. The implementation of the plant is currently pending site approval.

# GRI 303-3 WATER WITHDRAWAL:

In 2024/25, SAGT withdrew 52,488 m³ of water from the National Water Supply and Drainage Board (NWSDB), representing a 26% reduction from the previous year. This is also a 37% decrease in water withdrawal per box move, in comparison to 2023/24. This decrease is primarily due to the identification and repair of water leaks. Additionally, the Company has been proactive in raising awareness among staff about the importance of water conservation, fostering a culture of responsible water use.

SAGT does not extract water from any alternative sources such as groundwater or seawater, nor does it engage in rainwater harvesting activities. All water usage is solely reliant on the fresh water supplied by the NWSDB. Further the Port of Colombo is situated in a non-water stressed area of the country.

This reduction in water withdrawal reflects SAGT's commitment to sustainable water management

# **ENVIRONMENTAL STEWARDSHIP**

### **GRI 303-4 WATER DISCHARGE**

Whilst taking measures to keep its output to a minimum, SAGT ensures that it monitors and reviews effluents discharged to the environment. The Company's effluents remain in accordance with the guidelines stipulated by the EPL (awarded by the Central Environmental Authority (CEA) of Sri Lanka and its Water Management Policy which mandates responsible usage and discharge of effluents.

The Company adopts an aerobic and anaerobic biological process to treat the wastewater generated from the canteen and meal preparation areas. Sludge is disposed via third-party contractors approved by the CEA.

During the year, SAGT's total effluent discharge amounted to an estimated 28,386 m³. No violations of the guidelines of the EPL were reported. The discharged effluents which were within the tolerance limits specified by the Environmental Protection License (EPL) was discharged to the municipal council drainage system in the Port of Colombo.

For reporting purposes SAGT defines spills that cost LKR one million to treat and clean as significant. Further, the Company's respective divisions are responsible for closely monitoring incidents or activities that may potentially give rise to spills, fines or sanctions. One significant oil spill occurred during the period under review when a container carrying cashew nutshell liquid was damaged during container handling operations causing the contents to spill onto the vessel and into the sea. The estimated volume of the spill is 20 cubic meters. The Company made a deposit of over LKR one million for the clean-up operations with MEPA and worked with the Sri Lanka Ports Authority to completely clean the Port basin. Cashew nutshell liquid is an organic compound and therefore, there was no chemical pollution caused as a result of the spill. Other than the above incident, SAGT did not incur any fines for non-compliance with environmental legislation and regulations during the reporting period.

The Company follows a Standard Operating Procedure (SOP) developed in-house which outlines in detail the steps to follow should such an event occur. This minimises impact and improves the Company's responsiveness and incident readiness for the future.

SAGT also has a special stacking area for Dangerous Goods (DG) cargo in the event of a leak. The facility is fitted with a drainage system to dispose of leaking DG in an environmentally responsible

### **GRI 303-5 WATER CONSUMPTION**

During the year under review, the Company recorded a total freshwater consumption of 24,102m<sup>3</sup>. The water tanks utilised by SAGT support a total capacity of 100m<sup>3</sup>. There were no changes to the storage capacity within the period under review.

### WASTE MANAGEMENT

GRI 306-1: WASTE GENERATION AND SIGNIFICANT WASTE RELATED IMPACTS

GRI 306-2: MANAGEMENT OF SIGNIFICANT WASTE RELATED IMPACTS







SAGT's waste segregation process is designed to minimise its environmental impact by ensuring that unsorted waste is never sent to landfills. This process allows the Company to efficiently identify and manage waste disposal through approved contractors, focusing on recycling and reusing materials.

The Company generates both hazardous and non-hazardous waste, and it pays close attention to the environmental implications of their disposal. The management of hazardous waste is governed by Sri Lanka's Scheduled Waste Management regulations, which outline specific treatment requirements for such waste. All hazardous waste generated at SAGT is responsibly disposed of through incineration at a third-party facility, Insee Ecocycle Plant. All waste generated onboard vessels is disposed of through third parties licensed by the CEA of Sri Lanka.

In line with the Port of Colombo's (PoC) regulations, only third-party waste disposal contractors approved by the Marine Pollution Prevention Authority

(MPPA) and the CEA of Sri Lanka are permitted to manage waste disposal in a responsible manner

SAGT's hazardous waste includes electronics, batteries, used oils and lubricants, and grease-soaked cotton waste, and empty chemical containers. Non-hazardous waste streams consist of food waste from canteens, tyres from RTGs and Prime Movers, scrap iron, and other general waste.

Since 2020/21, SAGT implemented a waste segregation mechanism to ensure proper management and disposal. The Company also enhanced its waste management infrastructure to further improve segregation practices. Additionally, SAGT reduces waste generation by adopting circularity measures such as retreading and reusing Prime Mover tyres.

With support from the CEA, SAGT successfully integrated a comprehensive waste segregation system into its operations. Waste is segregated based on hazardous and non-hazardous categories, and disposal is handled by certified third-party suppliers authorised by the MPPA and the CEA of Sri Lanka. While SAGT prioritises responsible waste segregation and disposal, it also recognises the importance of reducing waste at the source. To this end, the Company conducts employee awareness programs on efficient material management during toolbox meetings and tracks daily food waste in the canteen using display boards.

Aligned with SAGT's Sustainability Management Framework, launched in 2020, the Company has established policies and processes for waste segregation and disposal. SAGT believes that impactful action can only be achieved through the collective effort of every individual within the organisation. Employees play a critical role in responsible waste segregation, and the Company continues to educate and raise awareness among third-party contract staff about the importance of proper waste management. Dedicated personnel have been assigned to oversee waste segregation and disposal, ensuring that waste streams are properly managed, and relevant data is collected and reported to the Sustainability Division.

GRI 306-3 WASTE GENERATED

Hazardous Waste	UOM	Consumption	Consumption	%
		in	in	Difference
		2024/25	2023/24	
Waste Oil	kg	48,510	37,422	30%
Contaminated Cotton Waste	kg	25,400	25,360	0.2%
Batteries	kg	4,862	1,635	197%
Biomedical waste	kg	3	6	-50%
Empty chemical containers	kg	8,030	-	0%
Total Hazardous Waste	kg	86,805	64,423	35%
Non-Hazardous Waste				
Food Waste	kg	64,924	62,978	3%
Tyres	kg	44,510	62,850	-29%
Iron, Tin, Copper and Wire rope	kg	353,198	246,245	43%
Engineering Waste (Including	kg	835,200	570,000	47%
paper, cardboard and plastic)				
Total Non-Hazardous Waste	kg	1,297,832	942,073	38%

In 2024/25, SAGT generated 1,384,637 kg of waste, marking a 38% increase compared to the previous year. The increase is largely attributed to higher engineering waste resulting from increased material consumption for maintenance activities. Additionally, the refurbishment and disposal of materials from office area upgrades contributed to the overall rise in waste generation.

The food waste generated at SAGT amounted to 64,924 kg during the year, making up 5% of the total waste generated in 2024/25 and representing a 3% increase from the previous year. The company continues to actively promote responsible food consumption through employee awareness sessions emphasising the importance of food waste reduction. This waste was disposed of through a third-party service, with efforts made to repurpose it as animal feed wherever possible.

All other engineering, mechanical, and maintenance-related waste was handed over to licensed third-party recyclers certified by the Marine Pollution Prevention Authority (MPPA) and the Central Environmental Authority (CEA) of Sri Lanka for proper recycling and disposal.

Through these efforts, SAGT remains committed to minimising waste generation and improving its environmental impact by prioritising recycling and responsible waste disposal practices.

GRI 306-4: WASTE DIVERTED FROM DISPOSAL GRI 306-5: WASTE DIRECTED FROM DISPOSAL

Hazardous Waste	UOM	Consumption in 2024/25	Consumption in 2023/24	% Difference
Waste diverted from disposa	al			
Reuse (waste oil)	kg	48,510	37,422	30%
Recovery (batteries)	kg	4,862	1,635	
Waste directed to disposal				
Incineration (contaminated cotton waste, biomedical waste)	kg	33,433	25,366	31.8%

Non-Hazardous Waste	UOM	Consumption in 2024/25	Consumption in 2023/24	% Difference
Waste diverted from disposal				
Reuse (Food Waste)	kg	64,924	62,978	3%
Recovery (engineering waste including paper, cardboard and plastic)	kg	1,232,908	879,095	40%
Waste diverted from disposal	kg	-	-	-

# GRI 308-1 NEW SUPPLIERS THAT WERE SCREENED USING ENVIRONMENTAL CRITERIA

SAGT's Supply Chain currently comprises 550 significant suppliers, encompassing a diverse range of providers, including equipment suppliers, maintenance service providers manpower providers waste disposal services, fuel suppliers, and providers of consumables such as stationery. SAGT's downstream value chain partners include shipping lines, local agents, inter-terminal trucking service providers, as well as importers and exporters. The Company sources a significant portion of its equipment from large international suppliers, while utilities, manpower. maintenance items, and consumables are procured locally.

SAGT is committed to involving its entire value chain in its sustainability journey. To this end, the Company maintains a rigorous purchasing policy followed by the Supply Chain Division when screening both local and international suppliers. The supplier screening process is transparent and includes several criteria, such as price, product quality, and sustainability standards. Suppliers are also required to adhere to the SAGT Supplier Code of Conduct, which sets expectations regarding environmental and social responsibility.

Once suppliers pass the screening process, they are onboarded and added to the Supplier Registry, which is managed by the Supply Chain Division. Regardless of their location, all suppliers are selected based on the guidelines outlined in SAGT's purchasing policy. For the supply of essential spare parts, SAGT primarily works with Original Equipment Manufacturers (OEMs) to maintain the highest quality standards and ensure equipment functionality. In cases where OEMs are unable to supply specific parts, SAGT turns to local agents and international distributors.

Suppliers are categorised based on the scope of goods and services they provide, whether they are dedicated partners, and whether they may be impacted by SAGT's operational effects on the environment and society. SAGT collaborates closely with key suppliers to ensure that its sustainability practices and values are reflected throughout their operations, with a focus on responsibility toward employees, society, and the environment.

In addition to these standards, SAGT initiated a supplier self-assessment process during the year and plans to conduct supplier audits in the next financial year. While no new criteria have been added to the selection process, the Company remains committed to ensuring that sustainability is a key factor in its supplier partnerships.



SAGT believes that its commitment to engage with both internal and external stakeholders should be grounded in the same ethical principles, reflecting a strong dedication to transparency, integrity, and mutual respect. The execution of the Company's operational framework is founded on a culture of diversity, inclusivity and equity amongst its employees, workforce, clients, suppliers and surrounding communities.

The health, safety and wellbeing of its workforce is a priority for SAGT. Thereby, the Company has in place policies and procedures to ensure a safe, progressive and empowering working environment. Employees are encouraged and given equal opportunity to develop their careers within the organisation.

The Company's HR policies, including the Employee Code of Conduct, Whistleblowing Policy, and Anti-Sexual Harassment Policy, provide a strong framework to uphold an ethical and responsible working environment. Further, policy and procedure such as the Supplier Code of Conduct and Supplier Portal ensure that the

Company's principle of ethics are permeated throughout its value chain.

SAGT aligns its Human Resource Management practices with the International Labour Organisation (ILO) standards, ensuring that its workforce-related policies, procedures, and partnerships within its value chain adhere to these global labour standards. Additionally, SAGT strictly adheres to Sri Lankan laws and regulations pertaining to Human Rights and Occupational Health & Safety, and upholds a zero-tolerance policy on Child Labour, Forced and Compulsory Labour and discrimination. The Company is committed to promoting Freedom of Association and nondiscrimination amongst its employees, workforce and value chain partners.

Reinforcing the importance of these safeguards, SAGT continuously monitors its workforce and value chain to ensure that non-discrimination and instances of forced labour and child labour do not occur. Further, all new suppliers to the organisation are subject to a supplier social assessment at the point of registering on SAGTs supplier portal.

The Company communicates all relevant and new initiatives to employees through the Company's routine team briefings, toolbox meetings, union meetings, emails and public announcements on the notice board.

The principle of collective bargaining is supported at SAGT, encouraging unions to enter into Collective Labour Agreements (CLA) with the Company. This process puts in place a strong foundation of communication and transparency, through which employee concerns can be raised and addressed. Periodic surveys conducted by an external third-party global service providers are carried out, ensuring employees can escalate their concerns to the management. The Company's sustainability management framework is utilised to track critical incidents related to forced labour and other related human rights violations, if any. These potential incidents are tracked quarterly through the relevant Key Sustainability Performance Indicators based on the identified material topics aligned to the GRI Topic Standards.

# GRI 401-2: EMPLOYEE ENGAGEMENT AND WELFARE

Employee Engagement is essential for fostering motivation, a team spirit, and keeping staff informed and productive. SAGT has continued to implement both formal and informal employee engagement initiatives designed to enhance motivation, strengthen the sense of belonging, and improve retention and overall productivity.

SAGT's remuneration package stands well above the country's minimum wage requirement. Remuneration is determined in an equitable manner, based on the role and the scope and scale of responsibility and not based on age, gender, race, ethnicity, sexual orientation, religious beliefs, physical ability or attributes, and political beliefs. The Company also honours all statutory obligations as specified in the Employees' Provident Fund Act and the Employees' Trust Fund Act, in addition to adhering to other benefit plans pertinent to the well-being of its full time and part time employees. The Company considers its annual total compensation ratio of its highest paid individual to the median compensation levels to be confidential in nature.

The statutory provision for the Gratuity fund is made for all employees marking over five years of service at SAGT; in line with the Sri Lanka Financial Reporting Standards (which mirror International Financial Reporting Standards-IFRS) and the Gratuity Act No 12 of 1983. The gratuity payment made at the end of the service period is half the employees' last drawn monthly salary, multiplied by the number of years the employee was in service.

SAGT is committed to the well-being of its employees, contract staff, and outsourced personnel by providing benefits beyond fair remuneration, including all statutory entitlements, personal protective equipment, and medical examinations. The Company ensures that manpower agencies supplying outsourced personnel comply with these requirements. Additionally, SAGT provides three daily meals at a significantly subsidised rate, with snacks and drinks available for purchase at nominal prices. Employees and contractor personnel also have access to essential facilities

such as restrooms and transportation within the port, fostering a safe and supportive work environment.

In addition to the above, the Company provided the following benefits to its employees that are not provided to outsourced personnel.

SAGT offers maternity leave to all eligible employees for 84 working days as per the statutory requirement. Flexi-hours are given for breastfeeding purposes upon return from maternity leave promoting work life balance. Further the Company has in place a paternity leave policy enabling new fathers to share in the responsibilities associated with the birth/adoption of an infant. The Paternity Leave policy which goes above and beyond statutory obligations entitles male employees to 21 days of paid leave within 12 months of the birth or adoption of their baby. SAGT is the first and to date remains the only organisation to introduce a paternity leave policy within Sri Lanka's Port sector and stands testament to the Company's efforts in fostering equality beyond the boundaries of its working environment. During the period under review, no employees availed maternity leave. A total of 31 employees availed paternity leave, with a 100% return-to-work rate

Health Benefits: The company provides free medical care to all employees during work hours, with a dedicated doctor, two nurses, and an ambulance available on-site. All employees are provided with a complete medical checkup once every two years. These health checkups are conducted at a leading private hospital in Sri Lanka. During the reporting period all employees underwent medical checkups. Once the reports are received, employees are provided with a consultation at SAGTs medical Centre by the Company's visiting Medical Doctor and if they need further review, they are referred to a Consultant/ Specialist. SAGT offers health insurance coverage to all employees, which extends to their immediate family members. Further, the Company also provides life insurance and disability/ invalidity coverage for all employees.

# **MATERNITY LEAVE**



84 Days from the date of birth or adoption of a child



Female employees eligible for maternity leave

No maternity leaves were availed in 2024/25

# **PATERNITY LEAVE**



21 days within one year from the date of birth or adoption of a child. 100%

Male employees eligible for paternity leave



Leave Availed

31 employees

100% Return to Work ate



Returned to work
31 employees

100% Retention Rate

Reaching out at times of need: In the unfortunate event of an employee's untimely passing, SAGT provides a one-time cash bursary to the family and continues to support the educational endeavours of the employee's children. Additionally, employees have access to a "Distress Loan" within a specified limit, which is made available within a day with minimal documentation requirements.

Moreover, as employees continue to feel the effects of Sri Lanka's economic crisis and increased personal income tax, the Company continues to provide a crisis allowance introduced in January 2023 for employees, to offset the immediate financial hardships.

Furthermore, employees are also afforded an opportunity to enjoy a one-night stay at a hotel of their preference with their families, which is reimbursed to a certain limit by the Company.

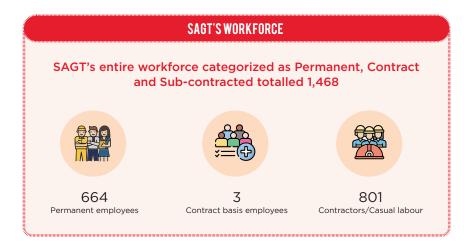
SAGT actively supports and encourages the education of employees' children in various ways. This includes the annual provision of school supplies such as school bags, books, and stationery; a monthly cash bursary for the top-performing students in the Grade 5 Scholarship Exam, as well as those gaining entry to state universities. Additionally, the company offers a career guidance program for employees' children who have completed their Advanced Level Examinations (GCE A/L), helping them navigate and choose their future career paths.

# Packs of school supplies Scholarships to state university entrants Scholarships to students passing the fifth-grade scholarship exams



SAGT's 2025 Christmas Carols Event

GRI 401-2: Benefits provided to full-time employees that are not provided to temporary or parttime employees	Full time employees	Third party contractors
Statutory benefits as per Sri Lanka's Employees' Provident Fund Act and Employees' Trust Fund Act	Ø	Ø
Statutory benefits as per Sri Lanka's Gratuity Fund Act	$\overline{\mathbf{V}}$	
Personal Protective Equipment required for working at the SAGT site	$\overline{\mathbf{V}}$	
Daily meals at a subsidised rate, onsite resting facilities and transportation within the Port of Colombo	Ø	$\square$
Onsite medical care on site at the Company's medical centre, including ambulance facilities if required	Ø	Ø
Mandatory health and safety trainings	Ø	$\square$
Health checkups every two years	Ø	×
Life insurance and disability/ invalidity coverage		×
Equitable remuneration	Ø	×
Parental Leave (Maternity and Paternity), including flexible working hours for breastfeeding mothers	Ø	×
Distress loan and benefits provided to employee's family in the event of an untimely passing of an employee.	☑	×
Supporting the education of employee's children	Ø	×
Crisis allowance to alleviate hardships due to Sri Lanka's economic crisis	Ø	×
A weekend at a star class hotel funded for employees and their families to a nominal limit	$\square$	×



Some of the informal channels of engagement that foster a spirit of camaraderie include the Annual Sports Day which offers employees and their families an opportunity to interact outside their workstations in a Starclass Hotel environment.

In December 2024, SAGT hosted a festive Christmas carol event, inviting employees and their families to join in, fostering a stronger sense of community and engagement. The event was held within the SAGT premises, following which the families of employees were given a tour of the terminal operations at SAGT.

# **EMPLOYEE DEMOGRAPHICS**

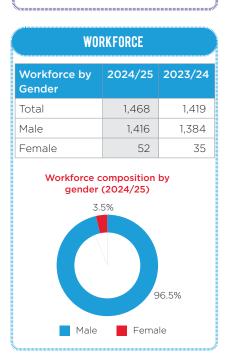
**GRI 2-7: EMPLOYEES** 

**GRI 2-8: WORKERS WHO ARE NOT EMPLOYEES** 

GRI 405-1: DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

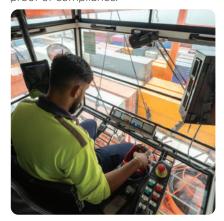
### PERMANENT EMPLOYEES **Employee Composition by Gender** 2024/25 2023/24 630 Total Permanent Employees 667 Male 625 602 Female 42 28 **Employee Composition by Gender** 800 (2024/25) 667 630602 600 400 200 9/1% 28 2024/25 2023/24 Total Permanent Employees Female Male Male Female **Employee Composition by Age Diversity Employee** 2024/25 2023/24 (2024/25)**Age Diversity** 15.3% Under 30 112 81 16.8% Aged 30-50 453 433 Over 50 102 122 679% Under 30 Aged 30-50 Over 50

# SUBCONTRACTED CASUAL LABOUR Contractors' 2024/25 2024/25 Personnel Total 801 783 791 776 Male Female 10 7 Contractors' personnel gender composition (2024/25) 1.2% 98.8% Female Male



In addition to the full-time workforce, the Company also provides numerous training opportunities to interns, and industrial trainees on a temporary basis with 65 individuals provided such an opportunity during the year under review. Whilst all members of SAGT's workforce reside in Sri Lanka, due to the 24-hour nature of the Company's operations, 82% of SAGT's employees work on a rostered full-time equivalent shift basis. There were no part-time or non-guaranteed hour employees during the reporting period.

The Company's sub-contractors provide essential operational services, including lashing, engineering maintenance, Prime Mover operations, and inter-terminal trucking. Additionally, other tasks such as waste segregation, terminal security, building and yard cleaning, and canteen services are also managed by sub-contractors. Given the nature of these operations, SAGT ensures strict adherence to occupational health and safety standards for sub-contractors deployed at the terminal. Ensuring they are up to date with safety training and consistently use personal protective equipment and uniforms while on duty, are top priorities for the company. SAGT also provides facilities on par with those offered to permanent employees, such as meal provisions and rest areas. Furthermore, the company ensures that statutory payments related to the Employees' Provident Fund (EPF) and Employees' Trust Fund (ETF) are paid on time by the sub-contractors' immediate employers and obtains documentary proof of compliance.



Our human capital is our most valuable asset in driving value creation.

# EMPLOYEE DIVERSITY AND EQUAL OPPORTUNITY

Diversity, equity, and inclusivity have been central to SAGT's sustainability strategy, with a particular emphasis on increasing female participation within the organisation.

# **MANAGEMENT DIRECTION**

SAGT recognises its human capital as its most valuable asset in driving value creation. The Company firmly believes that diversity in ethnicity, religion, and gender brings a wealth of perspectives, ideas, and experiences that foster innovation and creativity. As a result, an inclusive workplace culture is better equipped to meet the needs of a diverse customer base.

Accordingly, SAGT upholds a zero-tolerance policy towards discrimination, both for current employees and during recruitment. The company's policy of non-discrimination, based on race, gender, nationality, religion, or any other factor, is consistently applied across all HR processes, from recruitment to career development, promotions, and training.

SAGT is committed to cultivating a culture that respects individual identity and dignity, enabling growth and empowering employees to feel free and motivated to contribute to the company's objectives.

# Impacting SDG's:







SAGT strongly believes in a meritocracy-based policy for recruitment, remuneration and promotions. The Company ensures that its HR processes for hiring, and evaluation are fair and impartial, Remuneration is determined by the role and responsibilities, with no consideration given to age, race, ethnicity, religion, gender, or sexual orientation. The compensation and benefits ensure equal remuneration

for men and women in similar job roles based on the number of hours worked.

The Company considers its annual total compensation ratio of its highest paid individual to the median compensation levels to be confidential in nature.

With the introduction of the Paternity Leave policy in February 2024, the company extends its commitment to fairness and equity beyond the workplace. This policy actively encourages the equal sharing of familial and parenting responsibilities between men and women. Notably, SAGT is the only port sector organisation in Sri Lanka, and possibly in the region, to implement a Paternity leave policy for male employees within a high-pressure, productivity-driven industry environment.

SAGT remains committed to gender equity and continues to work towards increasing its female employee ratio, and will continue to actively lobby for more progressive legislation. In light of the current legal framework, SAGT plans to encourage more women to take up office-based and administrative roles. 24% of the company's executive cadre are women, with one female representative on the Senior Management Team. Due to the high-risk nature of the industry, SAGT does not employ individuals with disabilities.

SAGT has established long-term strategic partnerships with industry associations such as the Women's International Shipping and Trading Association (WISTA), Women in Logistics and Transport (WILAT), and Maritime SheEO. SAGT is also a member of the SheWorks initiative, which is dedicated to advancing opportunities for women in the workforce. These partnerships provide a platform for SAGT to advance the agenda for gender equality.

Through its partnerships with industry associations focused on gender equality, SAGT has facilitated over 70 women with first-hand terminal operations experience by organizing educational tours since 2022.

# LEADING THE WAY INGENDER EQUITY WITHIN THE INDUSTRY

Women have traditionally been discouraged from seeking employment in the Ports sector, with container terminal management being male-dominated due to societal perceptions, regulatory restrictions, and safety concerns. Female participation in Sri Lanka's Transport and Logistics Industry is also as low as 3.4%. However, SAGT has pioneered efforts to break this glass ceiling and increase female participation in the workplace. Since the formalisation of the Company's Sustainability Strategy in 2018, SAGT has made consistent strides in promoting gender equity and creating a more inclusive environment for women. The company set an ambitious target to raise its female workforce percentage from 4% to 20% by 2025.

Despite progress, outdated laws that restrict women from working beyond 6:00 PM have continued to hinder SAGT's efforts to achieve its goal. While SAGT has actively

participated in public fora on initiatives to reform antiquated regulations, there was very slow progress in achieving the objective towards the Company's gender target. In 2024, SAGT took on a more proactive approach and initiated discussions with the Secretary to the Minister of Ports Shipping and Aviation on integrating females into shift-based roles in the terminal. Through this discussion a proposal was sent to the Secretary detailing the arrangement to deploy females into terminal operations. With conviction, the Secretary requested approval from the Labour Department regarding female employees working beyond 6:00PM at the SAGT terminal premises. The Labour Commissioner in charge of the Standard Division of the Labour Department visited the terminal and inspected the premises to assess the organisation's readiness for creating a safe environment for the female workforce who will be working beyond 7:00PM. In September 2024, SAGT achieved groundbreaking success by securing permission from the Ministry

of Ports Shipping and Aviation and the Sri Lanka Labour Department to hire women into select shift-based operational roles.

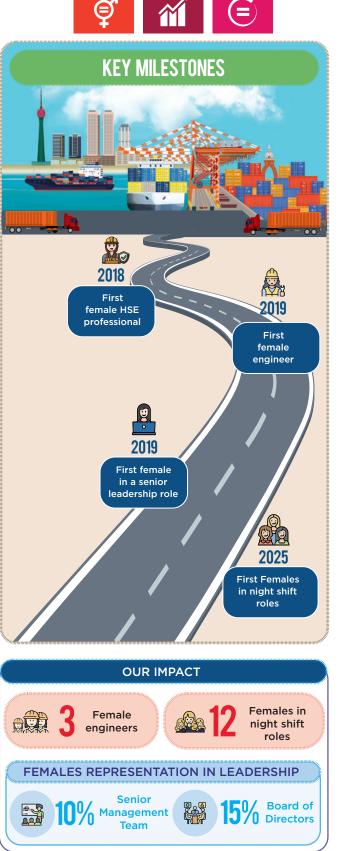
By January 1, 2025, 12 females were integrated into these roles, bringing the female representation in the company to 6% from the previous 4%. While this outcome includes tangible benefits, such as an expanded female workforce, SAGT's efforts have also resulted in intangible gains, such as breaking gender stereotypes and positioning the industry as a viable career path for women. This initiative not only marks progress in achieving gender equality within SAGT but also sets a benchmark for the wider Sri Lankan port industry, solidifying SAGT's role as a leader in fostering a more inclusive and equitable workplace.

Due to efforts in gender equality the number of female employees increased by 50% in 2024/25 compared to 2023/24.



Female representation increased by 50% in 2024/25 compared to 2023/24

# EXPANDING OPPORTUNITY FOR FEMALES IN SRI LANKA'S PORT SECTOR 5 GENDER EQUALITY **Grander Diversity at SAGT** Female Number of female employees from 2018 to 2025 2018 **4**<sup>0</sup>/<sub>0</sub> → **6**<sup>0</sup>/ First female HSE professional Overall female representation at SAGT due to the inclusion of females into night shift roles **OUR INITIATIVES** Anti-sexual Paternity Encourage women to explore unconventional roles Partnerships with industry **Enabling emerging** female leaders Female engineers Member of She Works - IFC Signatory - Women's



10 REDUCED INEQUALITY

# TRAINING AND DEVELOPMENT

Training and development is a critical success factor in maintaining a competent and well-rounded human capital, complete with the expertise needed for the success of the business.

# **MANAGEMENT APPROACH**

SAGT believes that helping employees unlock their full potential directly contributes to expanding the potential of the Company.

Accordingly, the Company affords both internal and external training opportunities.

Training needs are identified through annual performance appraisals conducted for executives and

staff members. Supervisors are also encouraged to nominate employees for training if they identify a need, while employees can request training through the Performance Management system, which includes a Self-Appraisal component.

Furthermore, the Company actively supports knowledge acquisition and skill development by providing financial assistance for employees pursuing postgraduate qualifications and memberships in professional bodies, reimbursing their fees to foster continuous growth and advancement.

# 404-1: AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE

28,098
Total Training Hours



24,862 training hours



3,236

**42%**†

Total training hours in 2024/25 compared to 2023/24

Period	Average Training Hours per Employee
2024/25	42
2023/24	31

35%1

Average training hours per

employee in 2024/25 compared to 2023/24

Average Training Hours per Employee by Category	2024/25	2023/24
Above Manager Grades	38	48
Managers	53	40
Assistant Managers	72	71
Executives	97	120
Non-executives	28	9

Average Training Hours by Gender	2024/25	2023/24
Male	40	31
Female	77	33

### TALENT MANAGEMENT

# GRI 401-1: NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER

Labour indicators, such as new hires and attrition rates, along with their analysis based on age and gender, are closely monitored by the Company. This data is crucial in identifying trends and emerging developments in the job market, enabling SAGT to respond proactively and strategically. It also serves as valuable input for shaping future strategies and ensuring the company remains aligned with workforce dynamics.

# Performance Management

Employee performance appraisals are a key component of SAGTs talent

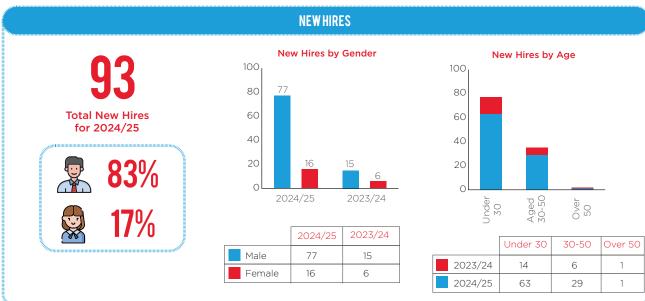
management strategy. The Company conducts bi-annual performance reviews, including mid-year and year-end assessments, to evaluate employee performance.

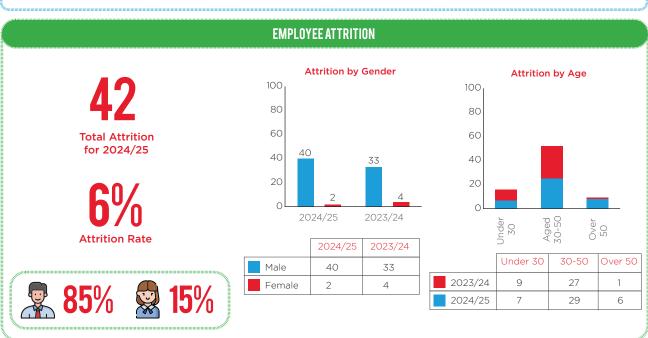
Clear objectives are set for all employees at the executive level and above. Throughout the year, employees are assessed based on their performance against these objectives and their alignment with behavioural competency frameworks. The review process includes a self-appraisal followed by an evaluation by the employee's supervisor.

Employees are graded on a fivepoint scale, with evaluations reviewed by the Career Committee, which is composed of a cross-functional team of management representatives. This ensures an impartial and objective assessment process, free from bias and discrimination

To enhance efficiency, consistency, and transparency, performance appraisals and objective setting are conducted through a digital performance management system.

The performance of contract personnel working at SAGT is monitored and managed by their respective employers in accordance with their contractual obligations.





### **OCCUPATIONAL HEALTH & SAFETY**

Occupational Safety and Health (OSH) within SAGT encompasses two key aspects: workplace safety and health, and employee well-being. SAGT's OSH framework is governed by a comprehensive policy, which is implemented throughout the organisation via the Health, Safety, and Environment (HSE) Department and the Occupational Safety and Health Committee.

All stakeholders, including employees and contractors, adhere to internally developed Standard Operating Procedures (SOPs) and precautionary measures when entering terminal premises. These procedures emphasise proactive risk management, continuous quality improvement, and contingency planning, ensuring that terminal operations are conducted in alignment with the highest safety standards.

# MANAGEMENT APPROACH

SAGT places a strong emphasis on occupational safety and health, particularly given the high-risk nature of its operational environment. The Company has a comprehensive safety strategy that involves constant monitoring and regular review of safety indicators. This approach ensures that potential risks are identified, managed, and mitigated proactively, rather than reactively. This strategy aims for zero accidents and ensures precaution to prevent workplace injuries.

The Company invests in developing its organisational capacity to handle safety risks. This means that employees are empowered with the knowledge and tools necessary to recognise, prevent, and address potential hazards before they escalate into issues.

Safety is a top priority at SAGT and takes precedence in all procedures taking place within the terminal. The aspects of health and safety are integrated into everyday operational tasks while ensuring terminal efficiency.

From the point of recruitment, employees are trained in safety procedures and protocols. This ongoing training ensures that employees are well-prepared for the specific risks associated with their roles and enhances the overall safety culture.

Moreover, the Company views occupational safety as an integral part of its culture, and by embedding safety into the company's ethos, it becomes a shared responsibility, making safety a continuous and natural consideration in day-to-day operations.

# Impacting SDG's:





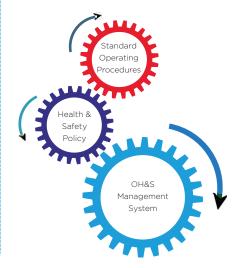
The Company's Occupational Safety and Health Committee (OSH Committee), is responsible for fostering a culture of safety within the organisation, ensuring that health and safety protocols are continuously reinforced and maintained.

The steps taken during the year 2024/25 to improve Occupational Safety and Health (OSH) conditions at the terminal reflect a comprehensive approach to fostering a safer and healthier work environment. During the year, the OSH Committee took several initiatives at the terminal to foster a culture of safety amongst its employees and contract workers such as implementing additional

yard buses to prevent employees and contractors walking in high-risk areas, creating pinning and unpinning stations on the quay to improve safety of lashing operations and implementing a ban on betel chewing within the terminal premises. These initiatives among others are described in detail in the below sections.

# GRI 403-1: OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM GRI 403-8: WORKERS COVERED BY AN OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Whilst Sri Lanka's labour laws set minimum requirements to ensure worker safety, SAGT's Occupational Health and Safety Management System (OHSMS) goes beyond these regulatory standards to provide a more robust and comprehensive approach to health and safety. SAGT has implemented a structured and well-defined OHSMS framework that is designed to not only meet but exceed the basic legal requirements, ensuring the safety and well-being of employees, contractors, and third-party visitors.



As illustrated, the comprehensive OHSMS is, further reinforced by a Health & Safety Policy and Standard Operating Procedures (SOP's)

The Health & Safety Policy and SOP's are applicable to all employees, contractors and all third parties visiting SAGT, ensuring 100% coverage to support the Company's proactive management of risks.

# REACHING A MILESTONE IN OH&S WITH THE DIGITISATION OF SAFETY Management.

The year marked a milestone in SAGT's Safety management strategy as well as its digital strategy, with the phased operational rollout of the Digital Safety Management System.

Following the conclusion of Phase I in the last quarter of 2023/24, which included the digitisation of the risk assessment and incident reporting process, the fully operational system consolidates all safety related tasks in one location, providing easy access to data, knowledge, and processes whilst its collaborative tools ensure the seamless execution of safety tasks.

SAGT has a dedicated Health and Safety Department led by a senior manager, whose primary responsibility is to oversee the operationalisation of the OHSMS across the organisation. The department plays a crucial role in ensuring that safety standards are not only adhered to but also continuously improved throughout the terminal. The team is also tasked with the identification and rectification of any incidents or cases of non-conformity with the OHSMS. By actively investigating safety incidents and addressing any failures in compliance, SAGT ensures continuous improvements in its safety practices. The OHSMS is audited by internal and external parties who review and determine its efficacy. Additionally, training programmes are reviewed to determine any potential improvements/advancements.

The Company has a contractor management process to ensure that contractors adhere to the same high safety standards as internal staff. This process includes weekly meetings and discussions with three of the critical contractor groups. These meetings provide an opportunity to review best practices which are followed by contractors, to review operating conditions to ensure that working environment remain safe, identify unsafe activities or behaviours and to develop solutions to mitigate these risks. This collaborative approach not only strengthens the overall safety culture but also helps proactively address any safety concerns before they lead to incidents.

SAGT believes that effective
Communication and Transparency is
essential to sustain a safety focused
culture. A dashboard was created to
display safety-related Key Performance
Indicators (KPIs) to enable
employees to view safety-related Key
Performance Indicators at a glance.
Developed with employee feedback,
the dashboard is shown on canteen
screens and discussed during monthly
communication meetings, ensuring
clear and effective communication
regarding safety indicators at SAGT.

# GRI 403-2: HAZARD IDENTIFICATION, RISK ASSESSMENT & INCIDENT INVESTIGATION

SAGT has adopted a Hazard Identification Risk Assessment (HIRA) grid, which is a critical component of the Company's safety framework. Developed in alignment with best practices followed by A.P. Moller Terminals, a global leader in terminal operations, this grid plays a pivotal role in identifying and mitigating potential risks in the terminal environment. The HIRA grid sets the tone for SAGT's operations by providing a structured approach to assessing hazards and ensuring that appropriate controls are in place to prevent accidents and ensure worker safety.

The HIRA grid specifically targets the "Fatal Five" risk categories that are known to pose the most significant safety threats in terminal operations. These critical areas are thoroughly

assessed for risks and continuously reviewed as part of the application of the relevant Standard Operating Procedures (SOPs). The Fatal Five are Transportation, Suspended Loads and Lifting, working at heights, stored Energy and Control of Contractors.

Staff and contractors participate in daily toolbox meetings prior to each shift, to identify potential hazards and risk mitigation mechanisms related to daily operations. Any safety related incidents along with mitigatory actions are discussed in detail at each shift.

# Procedure in the event of an incident:

SAGT follows a formal procedure when there is an instance of non-compliance with the SOP's. The process involves several steps such as: launch of an immediate investigation to determine the cause of the incident; and compiling of an Incident Report (IR) by the executive on duty. An IR must include detailed information such as a description of the incident, the list of people involved, possible violations of safety rules and procedures that may have led to the incident, corrective action and photographs of the incident. The IR is then circulated amongst all managers of the Company within 24 hours of the incident taking place. In the case of a serious injury, a comprehensive audit is conducted to review the Health and Safety practices related to the specific activity involved.

All employees participate in "Safety Walks" which are scheduled a year in advance and include all high-risk areas within the terminal. Employees are encouraged to identify and report all observations which are then presented to the relevant departments for necessary action.

A standard operating procedure (SOP) and Risk Assessment (RA) is mandatory for all activities that are conducted within the terminal. The SOPs and RAs are conducted by the relevant departmental functions under the guidance of the HSE Team. The Company also continues to adhere to its "Lock Our Tag Out" (LOTO) procedure which involves a colour coded tagging system for all malfunctioning equipment in order to

prevent the uninformed use of such equipment that could cause injury. Furthermore, materials storage and hoarding areas are high risk areas and require a safety data sheet to be displayed.

SAGT enforces a rigorous Personal Protective Equipment (PPE) policy to ensure the safety of all personnel and visitors in high-risk areas. The PPE includes safety shoes, hard-hats and a high visibility jacket; which is mandatory for all who enter high risk areas within the terminal. Reminder to wear the required PPE are displayed prominently at key points of entry to the terminal premises. Depending on the work and area of the terminal that is being accessed, the Company may also mandate other PPE accessories such as gloves, goggles and mufflers. It is noteworthy that all PPE used by SAGT is certified as meeting international standards. Additionally, all visitors entering the terminal are required to watch a safety induction video and sign a safety induction sheet confirming that he or she has understood the safety requirements for entering the terminal, following which a safety card is issued to the visitor to be used for the duration of the stay.

To improve the safety of its employees and contractors the company deployed an additional bus for employee transportation within the yard. This was initiated to eliminate walking between stacks which poses significant risk to personnel from vehicular movement and suspended loads.

To further enhance the safety of lashing operations, pinning and unpinning stations were introduced. Pinning and unpinning stations are designated areas on the quayside of a container terminal where trucks approach to pin or unpin the container from the trailer. These stations allow lashers to perform their duties in a safer and more secure environment. These stations optimise terminal operations by facilitating smoother operations. The infrastructure for these stations was developed in-house and is powered by solar panels to ensure sustainability. SAGT also remains the first and only terminal in the Port of

Colombo to introduce two safety cages for lashing operations.

# GRI 403-3 OCCUPATIONAL HEALTH

The Occupational Health Services at SAGT are designed to protect the health and well-being of employees with regard to their workplace environment. The company ensures a comprehensive approach to occupational health by identifying, documenting, and reviewing workplace risks and conducting detailed jobspecific assessments to manage and mitigate these risks.

Key high-risk categories, including quay crane operators, RTG operators, and engineering maintenance staff, are prioritised for specific health monitoring and protection measures. To further safeguard the health of its workforce, all SAGT employees are mandated to undergo a series of medical tests every two years. Additionally, new recruits are required to undergo a pre-employment medical screening before they are officially recruited, ensuring that they are fit for the specific demands of their roles.

SAGT provides robust medical support through an on-site medical Centre and the availability of a medical officer for all shift groups. The medical Centre and its staff are accessible to employees and contractors in the event of a medical emergency, ensuring that immediate care is available when needed. All medical services are provided free of charge to SAGT employees, emphasizing the Company's commitment to employee health.

SAGT places significant emphasis on emergency preparedness and the ability of its workforce to respond effectively to emergencies. The Emergency Response Team (ERT) undergoes regular training to ensure that members remain knowledgeable about the correct procedures for different emergency situations. Since the previous year, contract employees have also been incorporated into the ERT, thereby ensuring that SAGT's safety culture is embraced across its entire value chain. Contracted ERT

members receive the same training as regular employees, further solidifying this commitment

In addition to the ERT members, all SAGT employees are kept informed and trained on how to rapidly manage and mitigate the impacts of any accidents that may occur. This training includes comprehensive safety protocols and clear actions to take in case of an incident, ensuring employees are equipped to act swiftly and appropriately.

As part of its commitment to the overall health of its workforce, SAGT promotes employee engagement for work-life balance. The company has implemented programs to encourage employees to maintain a healthy balance between their professional and personal lives.

SAGT also arranges counselling services to support employees who may be experiencing high levels of stress or anxiety. Should an employee in a high-risk category be found to be unfit for their role, the company provides comprehensive support, including psychological, emotional, and financial assistance, ensuring that the employee is adequately supported throughout their recovery or transition.

To further promote well-being, SAGT continues to facilitate knowledge-sharing sessions to raise awareness about the importance of work-life balance. These sessions encourage employees to adopt practices that foster overall health and well-being. As such the company arranged an awareness session on mental health and mindfulness for all employees which was conducted by a medical doctor.

During the year, SAGT commenced launching a campaign to raise awareness about the harmful effects of betel chewing and smoking, with the long-term goal of implementing a full ban on betel and tobacco within the terminal premises. A crossfunctional team was appointed to drive this initiative, ensuring a structured and supportive approach to its implementation.

Key measures taken included an awareness session on the causes and impacts of oral cancer, conducted by a medical professional, and a survey to identify employees who currently engage in smoking and betel chewing. To support those looking to quit smoking, the company is planning to introduce a buddy program, where employees who have successfully overcome tobacco addiction will mentor and encourage their colleagues by sharing experiences and conducting awareness sessions.

Moving forward, SAGT remains committed to fostering a healthier work environment by continuing to educate employees and contractors on the adverse effects of tobacco use and betel chewing. In the next reporting period, the Company plans to ban betel chewing within its premises for staff, contractors and visitors.

# GRI 403-4 WORKER PARTICIPATION, CONSULTATION AND COMMUNICATION ON OCCUPATIONAL HEALTH & SAFETY

SAGT actively encourages all employees and contractors to promptly report any unsafe working conditions to their supervisor and seek guidance as needed. This open line of communication ensures that safety concerns are addressed in a timely manner, reducing risks and fostering a culture of accountability. Additionally, trade unions are expected to communicate any health and safety concerns, either in writing or during meetings, ensuring that employee feedback is consistently heard and acted upon.

Moreover, SAGT has internal compliance departments which hold overall responsibility for ensuring that SAGT complies with all relevant corporate and legislative obligations governing health and safety. SAGTs

# **MOBILE EYE CLINIC**







**AWARENESS SESSIONS** 











# **EMERGENCY RESPONSE DRILLS**





Occupational Safety and Health (OSH) Committee, is made up of a cross functional team which is chaired by the CEO. The Committee plays an important role in propagating a culture of safety within the organisation. The Committee met every month during the year under review.

The ERT, comprising managers, executives, operations and technical staff, are equipped with necessary resources to provide appropriate emergency procedures at their designated work locations. Additionally, the HSE team uses a range of communication tools to foster a strong safety culture throughout the organisation. These tools include monthly team briefings, toolbox meetings, electronic displays, noticeboards and suggestion boxes to reinforce safety messages and keep employees engaged. Furthermore, awareness sessions on the OSH policy are conducted for newly inducted operations and engineering executives. These sessions provide them with the essential knowledge and skills to lead their teams effectively and communicate the importance of maintaining safe working conditions.

During the year, the Company held its annual Safety Week under the theme "Being Curious Everyday". This initiative emphasized the importance of fostering a proactive safety culture, encouraging employees to stay vigilant, be aware of their surroundings, and take collective responsibility for each other's well-being. A series of engaging activities, including emergency drills, safety competitions, and awareness sessions, were organised for both employees and contractors to reinforce safety best practices across the organisation.

# GRI 403-5 WORKER TRAINING ON OCCUPATIONAL HEALTH & SAFETY

The HSE department ensures that both employees and contractors receive annual training, with a comprehensive training plan and schedule provided at the start of each year. This plan also includes specific training requirements tailored to individual roles.

In addition to the annual training, daily briefings are conducted at the start of each shift in the engineering and operations departments to reinforce key safety protocols and ensure ongoing awareness

All employees and contractors undergo mandatory safety refresher training annually. The trainings include a theory and practical session reinforcing safety readiness among its staff and contractors.

Customised training is also carried out based on job levels, with employees who engage in high-risk jobs. ERT members are provided specialised trainings on areas such as safe handling and maintenance of equipment. Internal as well as external resources are utilised for these training workshops.

Identifying vehicular movement as a leading indicator for incidents occurring within the terminal, the Company organised a specialised defensive driving training. The training was provided to employees and contractors that drive vehicles within the terminal. The training was conducted by a resource person from the International Safety Consultants in Sri Lanka, through a theory as well as practical session. Following the training each participant was provided a defensive driving certified license with a validity period of two years. The training was provided to 156 employees and 444 contractors.

A specialised first aid training was also provided to ERT members during the year to bolster their incident readiness in the event of a medical emergency. The first aid training was carried out through Red Cross. 98 employees and 60 contractors received this training.

The Company also conducted specialised training on welding and gas cutting for 54 personnel consisting of staff and contractors as well as a specialised safety training for the 17 trainees from the Vocational Training Authority.

54 employees were given training on Hazard Identification and Conducting Risk Assessments. This training also familiarised employees with performing these activities using the tools available on the Company's digital safety management system.

Recognising the risks of lashing operations, the company introduced a comprehensive specialised training program for contractors engaged in lashing operations.

During the period SAGT also sponsored the National Safety and Health Conference organised by the National Institute of Occupational Safety and Health. While the conference brought together health and safety professionals from diverse industries to share insights on enhancing occupational health and safety, it provided a platform for SAGT's HSE team to gather insights from other industry professionals on improving workplace safety.

# GRI 403-6 PROMOTION OF WORKER

SAGT works with contractors directly to ensure that all personnel who work within SAGT are given equal access to medical care.

Workers engaged in high-risk jobs are mandated to undergo annual medical checks with all costs borne by the Company.

SAGT recognises that employee health extends beyond physical well-being, understanding that mental health and physical health are often interdependent. In addition to arranging counselling services for those who may experience job related stress and anxiety, SAGT promotes mental wellbeing and worklife balance by sponsoring a one-night hotel stay with their families, for all its employees.

# GRI 403-7 PREVENTION AND MITIGATION OF OCCUPATIONAL HEALTH & SAFETY IMPACTS DIRECTLY LINKED BY BUSINESS RELATIONSHIPS

The Company's Occupational Health and Safety Management System (OHSMS), consisting of standard operating procedures (SOPs) and best practices, has been internally developed to ensure the safety of employees, contracted workers, and visitors on-site. Prior to entering SAGT premises, all individuals are required to undergo a mandatory safety induction, providing them with essential health and safety training to promote a safe working environment.

# GRI 403-9 WORKER RELATED INJURIES

During the year, there were no employeerelated fatalities or high-consequence injuries. However, there were two recordable work-related injuries, due to moving heavy machinery and exposure to harmful substances. This resulted in a total of 72 lost days. The employee work-related injury rate for the 2024/25 period is 0.3 calculated on the basis of 200,000 hours worked by 100 employees. The total number of hours worked by all employees during the reporting period was 1,334,000 hours. In comparison, the previous year saw no work-related recordable injuries. Of the two recordable work-related injuries, both were male employees.

Despite the Company's continued attention to workplace health and safety, a fatality occurred during the period under review due to a workrelated injury involving a contractor engaged in the repair and maintenance of lighting towers within the terminal premises. Following this accident, the Company took immediate action to conduct a comprehensive investigation with external third parties and relevant government authorities to identify the root cause of the accident. Further a full-scale audit of SAGT's safety policies, procedures and practices was conducted by the Regional Head of Safety of APM Terminals. The Company also took immediate action to communicate the key learnings from the incident amongst its employees and contractor staff. Further, all existing risk assessments for routine and non-routine tasks were suspended and reviewed by SAGT employees. To strengthen control over its contractor parties, the organisation strictly enforced review of the contractor's work method and conducted a relevant risk assessment. No contractor will be issued work permits to engage in activities on the terminal premises without following the abovementioned process.

In addition to this the Company also took immediate action to review and create SOPs and work methods for all activities taking place within the terminal. Dedicated teams were appointed within the engineering and operations departments for effective execution.

There were five recordable injuries involving contractor personnel, resulting in a recordable injury rate of 0.62 calculated on the basis of 200,000 hours worked by 100 contractor's personnel. The total number of hours worked by all contractor's personnel during the reporting period was 1,602,000 hours. The injuries were due to malfunctioning equipment, moving heavy machinery and vehicle collisions. In the 2023/24 period, contractor personnel experienced two recordable injuries, with an injury rate of 0.38. There were no fatalities, high consequence injuries or recordable workrelated injuries reported amongst female contractors during the period under

# HANDLING OF DANGEROUS CARGO AT SAGT:

SAGT has implemented a comprehensive Standard Operating Procedure (SOP) for the handling Dangerous Cargo. This procedure outlines the process to be followed to ensure safe handling and compliance with relevant regulations. As part of this process, segregation of dangerous cargo within the SAGT yard is conducted according to international standards, with regular inspections performed by the operations team to ensure adherence to safety protocols.

Additionally, random audits of dangerous cargo segregation are carried out by both the HSE and Operations teams to maintain high standards of safety and compliance. To further enhance safety, dedicated container stacking areas have been established for leaking containers, ensuring that any dangerous cargo that poses a risk is safely isolated and managed.

The Company also ensures that International Maritime Dangerous Goods (IMDG) training is provided to employees from relevant functions once every two years. Further the Company simulates emergency drills related to handling dangerous cargo on an annual basis to bolster the incident readiness of its employees.

# GRI 406-1: INCIDENTS OF DISCRIMINATION & ACTIONS TAKEN

In 2019, SAGT became the first organisation within the Port of Colombo to introduce Anti-Sexual Harassment and Whistleblowing policies. To date, it remains the only shipping terminal

operator in PoC to have implemented such policies, demonstrating its commitment to fostering a safe, inclusive, and transparent workplace. These policies facilitate employees to raise concerns or any grievances and to report any such incidents that may impact the integrity of its stakeholders or operations. No incidents of sexual harassment or whistleblowing were reported during the year.

All employees of SAGT, irrespective of age, race, religion, nationality or any other factor; are afforded equal opportunity to actively engage in their job roles. They are empowered to maintain productivity, earn a fair income, and develop skills that support their career progression and growth within the organisation.

# GRI 407-1: OPERATIONS AND SUPPLIERS IN WHICH THE RIGHT TO FREEDOM OF ASSOCIATION AND BARGAINING MAY BE AT RISK.

In alignment with Sri Lanka's labour laws governing negotiations, all employees at SAGT have the right to exercise their freedom of association. This includes the freedom to choose whether to join or refrain from joining any industrial association in pursuit of industrial action. As of the end of the financial year 2024/25, 66% of SAGT employees are covered under the Collective Labour Agreement (CLA), ensuring their rights and interests are represented in line with industry standards.

Recognizing the importance of open communication between the organisation and Trade Unions, SAGT continued to foster strong, cordial relationships with Trade Union representatives throughout the year. In addition to the Collective Labour Agreement (CLA), regular meetings with Trade Union representatives are held to address employee concerns and ensure effective collaboration.

SAGT follows an Open-Door policy, allowing Trade Union representatives to approach management with issues and concerns, promoting a transparent and accessible communication environment. Additionally, the Company has implemented a dispute resolution procedure, designed to address and resolve issues that may not be covered in the CLA.

Moreover, employees and contractors are encouraged to share their suggestions with management through suggestion boxes at toolbox meetings and during monthly team briefings, ensuring that all voices are heard and contributing to a culture of continuous improvement.

# FORCED OR COMPULSORY LABOUR

GRI 409-1 AND 408-1: OPERATIONS AND SUPPLIERS AT SIGNIFICANT RISK FOR INCIDENTS OF CHILD LABOUR, FORCED OR COMPULSORY LABOUR SAGT has a zero-tolerance policy on the use of child labour and compulsory or forced labour. Whilst no employee is

the use of child labour and compulsory or forced labour. Whilst no employee is compelled to work against his or her will, the Company ensures that employees are safeguarded from any form of physical punishment or harassment at the workplace. Furthermore, access to the port is restricted to underage workers, which ensures that there are no instances of child labour within its operations. As such no instances of forced/compulsory labour, child labour or any related incidents were recorded during the year.

# **CUSTOMERS**

# GRI 416-2: INCIDENTS OF NON-COMPLIANCE CONCERNING THE HEALTH & SAFETY IMPACTS OF PRODUCTS & SERVICES

The Company's Health & Safety Policy and Health & Safety Management System (HSMS) work in tandem to ensure a comprehensive approach to safety, for employees, contractors and all other individuals within its premises, including customers. This integrated system is designed to maintain a safe working environment and mitigate risks, demonstrating SAGT's commitment to protecting the health and well-being of everyone who interacts with the organisation.

The HSMS includes specific Standard Operating Procedures (SOPs) that focus on safeguarding the customers, agents of shipping lines, and third parties who utilise SAGT's services. It is designed to provide a safe and secure environment by minimising avoidable injuries, conducting timely hazard assessments, implementing risk mitigation strategies, and following principles of preventive maintenance.

All reported customer health and safety incidents, if any, are tracked and monitored on a quarterly basis. A consistent evaluation of the Company's level of emergency preparedness is also carried out to ensure readiness in case of any unforeseen situations. In addition, Emergency Response Team (ERT) members have been appointed among contractors who provide services within SAGT, helping to propagate a safety culture throughout the value chain.

During the year under review, there were no complaints filed by shipping lines or shipping agents regarding SAGT's health and safety protocols and practices. However, SAGT raised concerns with shipping lines regarding safety onboard vessels following vessel safety inspections carried out by SAGT staff when required.

### **CUSTOMER PRIVACY**

GRI 418-1: SUBSTANTIATED
COMPLAINTS CONCERNING
BREACHES OF CUSTOMER PRIVACY &
LOSSES OF CUSTOMER DATA

SAGT recognises the critical importance of customer data protection and privacy, particularly as the threat of cybercrime and breaches of information and privacy continue to escalate. As a result, the company places significant emphasis on safeguarding data and handling the confidential information of associates, employees, vendors, clients, and partners with utmost care and diligence to maintain confidentiality.

Regular audits are conducted to assess the adequacy of the Company's security systems and measures. Any vulnerabilities identified during these audits are promptly addressed to enhance data protection. Additionally, incidents of data privacy/security breaches and information loss, if any, are monitored by the Sustainability Division on a quarterly basis to ensure continuous vigilance.

During the year under review, there were no incidents of data privacy breaches or loss of customer information reported, highlighting the Company's strong commitment to maintaining the highest standards of data security and confidentiality.

Following a stringent quarterly risk assessment process, SAGT evaluates its environmental, social, and other regulatory requirements to ensure alignment with all relevant criteria. The results of this assessment are then used to implement any necessary modifications, allowing the company to remain compliant and exceed regulatory standards, helping to prevent any potential breaches. During the year, no fines were imposed on SAGT, demonstrating the effectiveness of its proactive approach to compliance and risk management.

# TOWARDS SOCIETY & THE ENVIRONMENT

SAGT continued to contribute towards upliftment of society and the environment. The efforts to contribute to uplift society are often also channels of engagement for SAGT's employees which foster volunteerism, concern for social and environmental issues and camaraderie. The key initiatives during the reporting period are featured below.

SAGT, through its dedicated sustainability department, fosters a strong and ongoing partnership with the Mission to Seafarers (MTS), working together to support and enhance the well-being of seafarers. Additionally, SAGT employees actively engage with vessels at the SAGT berth on key occasions, such as New Year's Day and Seafarers Day, to honour and express gratitude for the invaluable service of seafarers.

Throughout the year, SAGT has supported the Iththapana District Hospital, located near the mangrove restoration site, by providing essential items to help maintain the facility. A dedicated team from SAGT's engineering department visited the hospital, assisting staff with the installation of the donated items and carrying out much-needed repairs, significantly improving the conditions for both patients and healthcare staff.

SAGT remains committed to investing in the development of future generations by partnering with institutions like the University of Moratuwa and the Chartered Institute of Logistics and Transport (CILT). Through their mentorship program, students gain

valuable insights into developing soft skills, enhancing leadership potential, and preparing for career advancement. The programme also offers mentees a thorough understanding of terminal operations. SAGT ensures that the mentorship group is gender-diverse, promoting greater female representation and exposure in the industry.

SAGT has continued its partnership with the Marine Environment Protection Authority of Sri Lanka (MEPA) to support the upkeep of coastal health. As part of this collaboration, SAGT provided PPE and cleaning equipment to volunteers at MEPA's beach clean-up events, organised under the Clean Sri Lanka initiative. Additionally, 104 SAGT employees actively participated in the annual beach clean-up event, working alongside MEPA to make a meaningful impact on preserving the coastal environment.

As part of its CSR initiatives, SAGT extended container storage waivers worth approximately LKR 2.6 million to support importers experiencing delays

due to circumstances beyond their control.

Additionally, the Company partnered with one of its third-party contractors to donate reusable items from its building refurbishment, including office furniture, electrical appliances, and bathroom fittings—to upgrade facilities for a community netball and basketball team, as well as the Scouts headquarters in Colombo. These initiatives not only strengthen collaboration between SAGT and its stakeholders but also promote circularity within the Company's value chain and the wider community.

Malnutrition among children is a national concern in Sri Lanka. The unprecedented economic crisis in 2022 further exacerbated malnutrition among vulnerable communities in the country. During this period, the Thriposha program, which is the Government of Sri Lanka's fortified program to combat malnutrition among pregnant and lactating mothers and children between the ages of 6 months to five years, came to a halt due to a lack of funds and raw

materials. Within this backdrop SAGT stepped up to provide raw materials to the value of LKR 184 million to sustain the production of Thriposha in the country. An MOU was signed between SAGT, Sri Lanka Thriposha Limited and the Ministry of Health in January 2023 for the governance and execution of the project. The Company appointed a cross functional, diverse project team that was overseen by a steering committee consisting of the Company's Senior Management Team. The project team was led by the Chief Financial Officer. The project team worked in partnership with Sri Lanka Thriposha Limited to identify the most pressing need to be full cream milk powder which is a key ingredient for Thriposha production. SAGT partnered with Fonterra Brand Ltd to supply 75MT of full cream milk powder which contributed to production of about 3 million packs benefiting approximately 1.5 million beneficiaries. (2 packs per beneficiary)







Team SAGT at the Iththapana District Hospital

# INDEPENDENT ASSURANCE STATEMENT



INDEPENDENT ASSURANCE STATEMENT (DRAFT) to the Management of South Asia Gateway Terminals (Pvt) Ltd.

South Asia Gateway Terminals (Pvt) Ltd. ('SAGT' or 'the Company', Company Registration Number PV326) commissioned DNV Business Assurance India Private Limited ("DNV"," us" or "we") to conduct an independent assurance of its sustainability/non-financial disclosures in its Sustainability Report 2024-2025 (hereafter referred as 'Report').

# SCOPE OF WORK AND BOUNDARY

As per the agreed scope of work, we performed our assurance (Type 2, Moderate level) activities based on AccountAbility's AA1000 Assurance Standard v3, and DNV's assurance methodology VeriSustainTM protocol.

The scope of work included information on non- financial performance which were disclosed in the Report prepared by SAGT based on GRI Topic-specific Standards for the identified material topics for the activities undertaken by the Company during the reporting period 01/04/2024 to 31/03/2025.

The reported topic boundaries of non-financial performance are based on the internal and external materiality assessment covering Company's operations as brought out in the section 'Report Scope and Boundary' of the report. Reporting and assurance boundary covers the performance of the operations of SAGT in the Port of Colombo' that fall under the direct operational control of the Company's Legal structure unless otherwise specified 'Report Scope and Boundary period' of the report.

# REPORTING CRITERIA AND STANDARDS

The disclosures have been prepared by SAGT:

- in accordance with the requirements of Global Reporting Initiative (GRI) standards 2021
- Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard.

## ASSURANCE METHODOLOGY/ STANDARD

DNV carried out assurance engagement in accordance with DNV's VeriSustainTM protocol (V6.0), which is based on our professional experience and international assurance practice, and AccountAbility's AA1000 Assurance Standard (AA1000AS v3). DNV's VeriSustainTM Protocol (V6.0) has been developed in accordance with the most widely accepted reporting and assurance standards. Apart from DNV's VeriSustainTM protocol (V6.0), DNV team has also followed ISO 14064-3 - Specification with guidance for the verification and validation of greenhouse gas statements to evaluate disclosures wrt. Greenhouse gases.

#### **BASIS OF OUR CONCLUSION**

As part of the assurance process, a multi-disciplinary team of assurance specialists performed assurance work for selected sites of SAGT. We carried out the following activities:

- Reviewed the disclosures in the report. Our focus included general disclosures, GRI topic specific disclosures and any other key metrics specified under the reporting framework.
- Understanding the key systems, processes and controls for collecting, managing and reporting the non-financial disclosures in report.
- Walk-through of key data sets.
   Understand and test, on a sample basis, the processes used to adhere to and evaluate adherence to the reporting requirements.

#### OUR COMPETENCE, AND INDEPENDENCE

DNV applies its own management standards and compliance policies for quality control, which are based on the principles enclosed within ISO/IEC 17029:2019- Conformity Assessment - General principles and requirements for validation and verification bodies and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. DNV has complied with the Code of Conduct during the assurance engagement. DNV's established policies and procedures are designed to ensure that DNV, its personnel and, where applicable, others are subject to independence requirements (including personnel of other entities of DNV) and maintain independence where required by relevant ethical requirements.

This engagement work was carried out by an independent team of sustainability assurance professionals. During the reporting period i.e FY 2024-25, DNV, to the best of its knowledge, was not involved in any non-audit/nonassurance work with the Company and its Group entities which could lead to any Conflict of Interest. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement. DNV maintains complete impartiality toward stakeholders interviewed during the assurance process.

DNV Business Assurance India Private Limited

Statement Number: DNV-2025-ASR-790918

## INDEPENDENT ASSURANCE STATEMENT



- Collect and evaluate documentary evidence and management representations supporting adherence to the reporting requirements.
- DNV audit team conducted on-site audits for corporate offices and sites. Sample based assessment of site-specific data disclosures was carried out.
- Reviewed the process of reporting as defined in the assessment criteria.
- Interviews with selected senior managers responsible for management of disclosures and review of selected evidence to support environmental KPIs and metrics disclosed the Report. We were free to choose interviewees and interviewed those with overall responsibility of monitoring, data collation and reporting the selected indicators.
- Verification of the consolidated reported performance disclosures in context to the Principle of Completeness as per VeriSustainTM Protocol, V6.0 for Type 2, Moderate level of assurance for the disclosure.

#### **OUR CONCLUSION**

On the basis of work undertaken, nothing has come to our attention to suggest that the Report does not properly adhere to the principles described below; and the sustainability disclosures (including GRI 2: General Disclosures, GRI 3: Management Approach and other GRI disclosures as mentioned in Annexure I) have not been reported in accordance with the GRI Standard 2021.

# AA1000 ACCOUNTABILITY PRINCIPLES STANDARD (AA1000APS, 2018)

#### 1. Inclusivity

The participation of stakeholders in developing and achieving an accountable and strategic response to Sustainability.

The Report brings out the stakeholders who have been identified as significant to SAGT, as well as the modes of engagement established by the Company to interact with these stakeholder groups. The key topics of concern and needs of each stakeholder group which have been identified through these channels of engagement are further brought out in the Report.

Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Stakeholder Inclusiveness.

#### 2. Materiality

The process of determining the issues that are most relevant to an organisation and its stakeholders.

The Report explains out the materiality assessment process carried out by the Company which has considered concerns of internal and external stakeholders, and inputs from peers and the industry, as well as issues of relevance in terms of impact for SAGT's business. The list of topics has been prioritised, reviewed and validated, and the Company has indicated that there is no change in material topics from the previous reporting period.

Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Materiality.

#### 3. Responsiveness

The extent to which an organisation responds to stakeholder issues.

The Report adequately brings out the Company's policies, strategies, management systems and governance mechanisms in place to respond to topics identified as material and significant concerns of key stakeholder groups. Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Responsiveness.

Nothing has come to our attention to believe that the Report does not meet the requirements related to the Principle of Responsiveness.

#### 4. Impact

The level to which an organisation monitors, measures and is accountable for how its actions affect its broader ecosystems.

The Report brings out the key performance metrics, surveys and management processes used by SAGT to monitor, measure and evaluate its significant direct and indirect impacts linked to identified material topics across the Company, its significant value chain entities and key stakeholder groups.

Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Impact.

#### 5. Reliability/Accuracy

The accuracy and comparability of information presented in the report, as well as the quality of underlying data management systems.



The Report brings out the systems and processes that the Company has set in place to capture and report its performance related to identified material topics across its reporting boundary. The majority of information mapped with data verified through our remote assessments with SAGT's management teams and process owners at the Corporate Office and sampled sites within the boundary of the Report were found to be fairly accurate and reliable. Some of the data inaccuracies identified in the report during the verification process were found to be attributable to transcription, interpretation, and aggregation errors. These data inaccuracies have been communicated for correction and the related disclosures were reviewed post correction.

Nothing has come to our attention to believe that the Report does not meet the principle of Reliability and Accuracy.

# Additional Principles as per DNV VeriSustainTM Protocol (V6.0)

#### 1. Completeness

How much of all the information that has been identified as material to the organisation and its stakeholders is reported?

The Report brings out the Company's performance, strategies and approaches related to the environmental, social and governance issues that it has identified as material for its operational locations coming under the boundary of the report, for the chosen reporting

period while applying and considering the requirements of Principle of Completeness.

Nothing has come to our attention to suggest that the Report does not meet the Principle of Completeness with respect to scope, boundary and time.

## 2. Neutrality/Balance

The extent to which a report provides a balanced account of an organisation's performance, delivered in a neutral tone.

The Report brings out the disclosures related to SAGT's performance during the reporting period in a neutral tone in terms of content and presentation, while considering the overall macroeconomic and industry environment.

### **INHERENT LIMITATIONS**

DNV's assurance engagement assume that the data and information provided by the Company to us as part of our review have been provided in good faith, is true, complete, sufficient, and authentic, and is free from material misstatements. The assurance scope has the following limitations:

- The assurance engagement considers an uncertainty of ±5% based on materiality threshold for estimation/ measurement errors and omissions.
- DNV has not been involved in the evaluation or assessment of any financial data/performance of the company. DNV does not take any responsibility of the financial data reported in the audited financial reports of the Company.
- The assessment is limited to data and information within the defined Reporting Period. Any data outside this period is not considered within the scope of assurance
- Data outside the operations specified in the assurance boundary is excluded from the assurance, unless explicitly mentioned otherwise in this statement.
- The assurance does not cover the Company's statements that express opinions, claims, beliefs, aspirations, expectations, aims, or future intentions. Additionally, assertions related to Intellectual Property Rights and other competitive issues are beyond the scope of this assurance.
- The assessment does not include a review of the Company's strategy or other related linkages expressed in the Report. These aspects are not within the scope of the assurance engagement.
- The assurance does not extend to mapping the Report with reporting frameworks other than those specifically mentioned. Any assessments or comparisons with frameworks beyond the specified ones are not considered in this engagement.
- Aspects of the Report that fall outside the mentioned scope and boundary are not subject to assurance. The assessment is limited to the defined parameters.
- The assurance engagement does not include a review of legal compliances. Compliance with legal requirements is not within the scope of this assurance, and the Company is responsible for ensuring adherence to relevant laws.

# INDEPENDENT ASSURANCE STATEMENT



Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Neutrality.

### **RESPONSIBILITY OF THE** COMPANY

SAGT has the sole responsibility for the preparation of the Report and is responsible for all information disclosed in the Report. The company is responsible for maintaining processes and procedures for collecting, analysing and reporting the information and ensuring the quality and consistency of the information presented in the Report. SAGT is also responsible for ensuring the maintenance and integrity of its website and any referenced disclosures on their website.

#### **DNV'S RESPONSIBILITY**

In performing this assurance work, DNV's responsibility is to the Management of the Company; however, this statement represents our independent opinion and is intended to inform the outcome of the assurance to the stakeholders of the Company. DNV disclaims any liability or co-responsibility for any decision a person or entity would make based on this assurance statement.

## USE AND DISTRIBUTION OF **ASSURANCE STATEMENT**

This assurance statement, including our conclusion has been prepared solely for the Company in accordance with the agreement between us. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Management

of the Company for our work or this assurance statement. We have not performed any work, and do not express any conclusion, on any other information that may be published outside of the Report and/or on Company's website for the current reporting period.

The use of this assurance statement shall be governed by the terms and conditions of the contract between DNV and the SAGT and DNV does not accept any liability if this assurance statement is used for an alternative purpose from which is intended, not to any third party in respect of this assurance statement.

For DNV Business Assurance India Private Limited





Digitally signed by Tikare, Prakash Date: 2025.06.27 15:31:52 +05'30'

Sharma by Sharma, Anjana , Anjana 2025.06.27

Digitally signed 14:59:06 +05'30'

#### Chandan Sarkar

Lead Verifier Sustainability Services, DNV Business Assurance India Private Limited, India.

### Prakash Tikare

Area Manager India & ME DNV Business Assurance India Private Limited

### Anjana Sharma

Assurance Reviewer Sustainability Services, DNV Business Assurance India Private Limited, India.

Verifiers: Jas Sahib Singh Chadha, So Hyun Kim

25/06/2025, Bengaluru, India





#### ANNEX I

GRI disclosures assured for Type 2 moderate level of assurance:

- GRI 205: Anti-corruption 2016 -205-1, 205-2, 205-3;
- GRI 301: Materials 2016 301-1;
- GRI 302: Energy 2016 302-1, 302-3, 302-4;
- GRI 303: Water and Effluents 2018- 303-1, 303-2, 303-3, 303-4, 303-5;
- GRI 305: Emissions 2016 305-1\*, 305-2\*\*, 305-3, 305-4, 305-5, 305-6;
- GRI 306: Waste 2020 306-1, 306-2, 306-3, 306-4, 306-5;
- GRI 308: Supplier Environmental Assessment 2016 308-1:
- GRI 401: Employment 2016 401-1, 401-2, 401-3;
- GRI 403: Occupational Health & Safety 2018 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8, 403-9;
- GRI 404: Training and Education 2016 404-1;
- GRI 405: Diversity and Equal Opportunity 2016 405-1;
- GRI 406: Non-discrimination 2016 406-1;
- GRI 407: Freedom of Association and Collective Bargaining 2016 407-1;
- GRI 408: Child Labour 2016 408-1;
- GRI 409: Forced or Compulsory Labour 2016 409-1;
- GRI 416: Customer Health and Safety 2016 416-2;
- GRI 418: Customer Privacy 2016 418-1;
- \* Scope 1 GHG emissions are calculated as per the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard with the emission factors sourced from the Intergovernmental Panel on Climate Change's (IPCC) Fifth Assessment Report, The UK Department for Environment, Food and Rural Affairs (Defra).
- \*\* Scope 2 GHG emissions are calculated as per the Average Emission Factor published by the Sustainable Energy Authority of Sri Lanka.

# ANNEX II SITES SELECTED FOR AUDIT

Sr. No.	Site	Location
1.	Corporate office and site	SAGT, Port of Colombo, Sri Lanka

# **GRICONTENTINDEX**

### STATEMENT OF USE

South Asia Gateway Terminals (Pvt) Ltd has reported in accordance with the GRI Standards for the period 1st April 2024 to 31st March 2025

## **GRI 1 USED**

GRI 1: Foundation 2021

OTHER SOURCE			
General Disclosures		10 17	
GRI 2: General Disclosures 2021	2-1 Organisational details	12-13	
	2-2 Entities included in the organisation's sustainability reporting	12-13	
	2-3 Reporting period, frequency and contact point	4	
	2-4 Restatements of information	4	
	2-5 External assurance	4, 71-75	
	2-6 Activities, value chain and other business relationships	4	
	2-7 Employees	56-58	1 POUTTY
	2-8 Workers who are not employees	58	
	2-9 Governance structure and composition	18-21	O DECENTANDS AND
	2-9 Governance structure and composition	10-21	8 ECCAN MICH AND A 16 PRIMA ANDREA ANDREA AND A 16 PRIMA ANDREA
	2-10 Nomination and selection of the highest governance body	18-19	
	2-11 Chair of the highest governance body	18	
	2-12 Role of the highest governance body in overseeing the management of impacts	18-19	
	2-13 Delegation of responsibility for managing impacts	18-21	
	2-14 Role of the highest governance body in sustainability reporting	18	
	2-15 Conflicts of interest	19	
	2-16 Communication of critical concerns	20-21, 54	*
	2-17 Collective knowledge of the highest governance body	18-19	
	2-18 Evaluation of the performance of the highest governance body	18-19	
	2-19 Remuneration policies	19, 55	
	2-20 Process to determine remuneration	19	
	2-21 Annual total compensation ratio	58	
	2-22 Statement on sustainable development strategy	6-10	
	2-23 Policy commitments	27-38	8 INSERT WORK AND 16 PRINT ADDRESS OF THE PRINT ADD
	2-24 Embedding policy commitments	18-20	
	2-25 Processes to remediate negative impacts		
	2-26 Mechanisms for seeking advice and	20, 22, 27-38	-
	raising concerns	20, 22, 27	

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	UNSDG Goals
	2-28 Membership associations	21	17 PARTHESIMES  FOR THE GOMES
	2-29 Approach to stakeholder engagement	21, 33-34, 44	
	2-30 Collective bargaining agreements	54	8 BECHT HORK AND ECONOMIS CHONTH
Material Topics			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	35	
	3-2 List of material topics	35-36	
Anti-Corruption			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	16 securities
GRI 205: Anti- corruption 2016	205-1 Operations assessed for risks related to corruption	21	
	205-2 Communication and training about anti-corruption policies and procedures	20-21	•
-	205-3 Confirmed incidents of corruption and actions taken	21	
Materials			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	
GRI 301: Materials 2016	301-1 Materials used by weight or volume	44	
Energy			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	7 GIEAN DIENSY
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	45	12 RESPONSE E CONSUMPTAN AND PRODUCTEDA AND PRODUCTEDA CONTROL
	302-2 Energy consumption outside of the organisation	Not Applicable	
	302-3 Energy Intensity	16	
	302-4 Reduction of energy consumption	45-48	
Water and Effluents			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	6 CLEAN WATER AND SAMINATION 12 ESSENCED E AND PROJUCTIVE AND PROJ
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	51	
	303-2 Management of water discharge- related impacts	51	•
	303-3 Water Withdrawal	51	
	303-4 Water Discharge	52	
	303-5 Water Consumption	52	
Emissions			_
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	7 AFFORMATION OF CHASE PROPERTY OF CHASE PROPERT
		-	

# **GRICONTENTINDEX**

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	UNSDG Goals
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	16, 46-49	
	305-2 Energy indirect (Scope 2) GHG emissions	16, 46-49	
	305-3 Other indirect (Scope 3) GHG emissions	48, information incomplete	
	305-4 GHG Emissions Intensity	16	
	305-5 Reduction of GHG Emissions	16, 46-48	
	305-6 Emissions of ozone-depleting substances (ODS)	47	
Waste			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	12 describing the second of th
GRI 306: Waste 2020	306-1 Waste generation and significant waste- related impacts	52	
	306-2 Management of significant waste- related impacts	52	
	306-3 Waste generated	53	
	306-4 Waste diverted from disposal	53	
	306-5 Waste directed to disposal	53	
Environmental Compliance			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	12 ESPONGELE ORSENPI (ID) A CONTROL ORSENPI (ID) A CONTROL ORSENPE (
Supplier Environmental Assessment			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	12 RESPONSELLE CONCRETE ON AND PRODUCTION
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers screened using environmental impacts	53	13 cuprate
Employment			•
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	•
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	62	10 RESOURCES
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	55-56	•
	401-3 Parental leave	55	
Occupational Health and Safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	
	403-1 Occupational health and safety management system	63-64	3 GOOD HEALTH 8 BECENT WORK AND HELESING CONTRIL
	403-2 Hazard identification, risk assessment, and incident investigation	64-65	

GRI STANDARD/	DISCLOSURE	LOCATION	UNSDG Goals
OTHER SOURCE	403-3 Occupational health services	65-66	
	403-4 Worker participation, consultation, and communication on occupational health and safety	67	
	403-5 Worker training on occupational health and safety	67	•
	403-6 Promotion of worker health	67	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	67-68	
	403-8 Workers covered by an occupational health and safety management system	64	
	403-9 Work-related injuries	68	3 GOOD HEALTH AND WELL-REPOR
Training and Education			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	5 GENERAL 8 BECENT HODE AND ECONOMIC SHOPPE
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	16, 61	
Diversity and Equal Opportunity			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	5 GENGER 8 BECENT WORK AND EDUCATION AND EDU
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	19, 58-60	
Non-Discrimination			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	5 CEMBER 8 CECANI HOUSE AND COMMINE CENOMINE
GRI 406: Non- Discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	68	
Freedom of Association and Collective Bargaining			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	8 ESCENTINDES AND ECONOMIC GEOMETRI
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	68-69	
Child Labour			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	8 DECENT WIDE, AND ECONOMIC CONTROL
GRI 408: Operations and suppliers at significant risk for incidents of child labour	408-1 Operations and suppliers at significant risk for incidents of child labour	69	
Forced or Compulsory Labour			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn.cloudfront. net/2021/12/SAGT-DMA-Report- latest-3.pdf	8 RECENT MUSIC AND COUNTY

# GRICONTENTINDEX

GRI STANDARD/	DISCLOSURE	LOCATION	UNSDG Goals
OTHER SOURCE			
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	69	
Customer Health and Safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn. cloudfront.net/2021/12/SAGT-DMA- Report-latest-3.pdf	
GRI 416: Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	69	
Customer Privacy			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn. cloudfront.net/2021/12/SAGT-DMA- Report-latest-3.pdf	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	69	
Socio Economic Compliance			
GRI 3: Material Topics 2021	3-3 Management of material topics	https://d3bo42cmohq4cn. cloudfront.net/2021/12/SAGT-DMA- Report-latest-3.pdf	8 DECENT WORK AND 16 PRAFE JOSEPH NO DECENTION OF THE PROPERTY



