





SUSTAINABLE BUSINESS MODEL & INNOVATION

The Group's core businesses play a significant role in supporting the daily lives of tens of millions of people by operating some of the world's biggest ports and retailers, infrastructure companies and mobile multimedia telecommunication networks. As innovation and technology are ever-changing and impacting the market, the Group continues to look for opportunities to create and capture value for all stakeholders by incorporating elements of social, environmental and market conditions into the investment process, and ensuring that both a sustainable and innovative business model can be achieved.

The Group is committed to protecting and promoting the interests of its customers by delivering its essential services with excellence. In the face of many complex and unprecedented challenges, the Group's core businesses are embracing innovation and collaboration to address sustainable development challenges and opportunities, such as building resilience to climate change, reaching underserved communities and engaging with customers to live and shop more sustainably.

This section of the report is linked with additional content in the Environmental and Social pillars and serves to emphasise how the Group is using sustainability as a lens to adapt its current and future business models as a source of value creation. In doing so, it is building a more successful and resilient business for many years to come.

GROUP GOALS

- OFFER CUSTOMERS SUSTAINABLE PRODUCTS AND INVEST IN AND EMBRACE INNOVATION TO ACHIEVE TRANSFORMATIONAL IMPACT

CONTENT IN THIS SECTION

- SERVICE EXCELLENCE
- CLIMATE-RESILIENT BUSINESS
- SOCIAL INCLUSION
- SUSTAINABLE PRODUCT CHOICES




Linked SDGs



SERVICE EXCELLENCE

The Group's core businesses work tirelessly to achieve excellence in serving and satisfying the daily needs of their customers. While business units continue to engage regularly with customers and gain insights into areas of interest or concern, the Group will remain flexible in adapting to evolving market conditions and will ensure the high quality of services and products provided. Safety is also one of the top priorities. The Group employs a robust and change-adaptable management system, to ensure that environmental, safety, and security hazards can be mitigated.

This topic on Service Excellence is closely linked with other material topics in the Group Sustainability Framework, including:

- [Supplier Screening and Assessments](#) 
- [Data Privacy and Cyber security](#) 
- [Health, Safety and Well-being](#) 

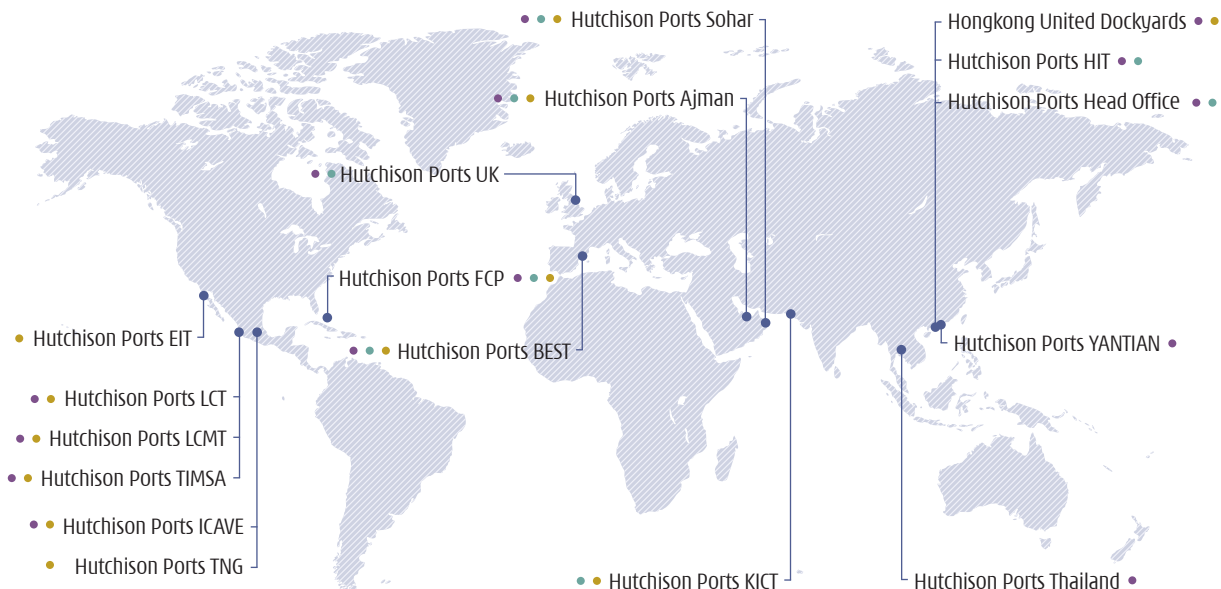
ISO Management Systems

The Group's business spans across industries and regions. Ensuring the quality, safety and protection of employees' well-being are critical elements in daily operations. International guidelines and standards, such as Quality Management Systems (QMS), Environmental Management Systems, Safety Management Systems and Information Security Management Systems guide the Group's business units to perform their daily operations in a consistent and reliable way by establishing and administering a set of robust processes and procedures incorporating management reviews, data analysis, corrective actions and audits. To provide additional assurance for customers and regulators, many of the Group's business units obtain certification for their management systems

in accordance with international standards, and according to areas of need in line with industry impact. For example, the Retail division implements QMS throughout its manufacturing operations. Watsons Water China and Hong Kong achieved ISO certifications. PARKnSHOP continues to maintain an ISO 17025 certification for its in-house chemical laboratory, which affirms technical competence in testing and calibration. Twelve ports of Hutchison Ports Network have received ISO 9001 certification, with further significant support for ISO 45001 and ISO 14001. Data centres and transmission in 3 Austria are ISO 27001 certified, ensuring that the technical environment adheres to quality or safety standards. 3 UK is certified to the ISO 14001 standard.

Figure 10 ISO certification at Hutchison Ports (Business units with ISO certificates contribute to 64.8% of 2023 total throughput of Ports)

- ISO 14001 Environmental Management Systems
- ISO 9001 Quality Management Systems
- ISO 45001 Occupational Health & Safety Systems





Hutchison Ports BEST


S.W.L under singlelift spreader 40t
S.W.L under twinlift spreader 61t
S.W.L under hook 71t



Quality and Safety Standards

The quality and safety management systems in place across all core businesses encompass senior management oversight, clear delineation of responsibilities, appointment of dedicated personnel, coordination of Emergency Response Planning, and well-defined processes and procedures for record keeping and documentation. They also focus on hazard identification and safety risk assessment and mitigation.

Many of the Group's business units have published performance standards exceeding regulatory requirements and reflecting market-leading practices.

For the Retail division, all of the Exclusive Brand products are tested at external laboratories, and the Exclusive Brand manufacturers are screened for social/environmental risks if it is located in medium and high-risk countries. 3 Hong Kong of the Telecommunications division also implements a set of comprehensive [Performance Pledges](#)  aimed at upholding the highest standards of service quality for network availability, service restoration and customer complaints handling.



Ports

IDENTIFYING AND ADDRESSING OPERATIONAL SAFETY ISSUES

Since 2014, Hutchison Ports has defined a set of Global Minimum Safety Standards (GMSS), which has been continually refined and updated (the current issue is version 7) to address emerging risk areas and raise the bar of expected performance. Monitoring against the GMSS includes deploying the Group's

Internal Control and Risk Management tool, whereby business units self-assess and report their status. Safety audits are also carried out by the Group Safety Committee which involves site visits to assess compliance with ratings issued using the standard Satisfactory/Acceptable/Inadequate criteria.



Infrastructure

DELIVERING WORLD-CLASS STANDARDS OF SERVICE

HK Electric has achieved world-class supply reliability ratings, consistently exceeding 99.999% since 1997. Its commitment to service excellence has been codified in its corporate policies on quality, customer services, complaints handling and corporate security that guide its workforce to achieve total customer

satisfaction through continuous improvement. Its Customer Services Steering Committee monitors service performance with reference to specific and measurable targets and its Stakeholder Satisfaction Steering Committee reviews customer complaints to ensure full and timely resolution.

Business Continuity Planning

With the increasing risk of regional incidents or even conflicts, business units are putting in place continuity plans to ensure that operations are subject to minimum disruption. Business continuity planning across the Group contains many common elements focused on resilience, recovery and contingency, with plans tailored to the industry needs of each core business. For example, the “Emergency Response Plans” are developed to maintain operations and to follow in the event of fire, flood or medical emergency; the “Cyber security Incident Response Plan” is put in place to provide operational guidelines for effectively identifying and promptly addressing cyber security incidents. All divisions also have a customised “Business Continuity Management Policy” as a guideline in case of disruption in operations.

Customer Relationship Management

The Group's core businesses implement various mechanisms for measuring customer satisfaction and monitoring feedback to follow up on complaints and implement corrective actions. The Retail division, for example, conducts regular customer surveys in each market, enabling dynamic incorporation of feedback on many aspects of customer satisfaction, including store environment, product range, prices and loyalty programme benefits, staff conduct and “Net Promoter Score” (the benchmarking tool for customer satisfaction). The Telecommunications division also adopts various customer engagement systems to gauge customer loyalty, satisfaction and enthusiasm, while the Infrastructure division implements a comprehensive and streamlined customer complaints handling system to address customer concerns.



Infrastructure

CUSTOMER-ORIENTED SERVICES

Australian Gas Networks recently reviewed and updated its “Complaint and Dispute Resolution Procedure” in 2023, which outlines the set of procedures that apply to “small customer” complaints to ensure compliance with Australian Standard 10002:2022 guidelines for complaints management in organisations. As part of these updates, Australian Gas Networks has established a comprehensive definition of the complaints handling process, which serves as a clear guideline to ensure that Australian Gas Networks' customer handling process is clearly defined and accessible to its customers.



Employee handles a customer's enquiry on site, Australian Gas Networks

CLIMATE-RESILIENT BUSINESS

Climate change and related extreme weathers are occurring at an alarming rate as compared to the past decade. Recognising the risk presented by climate change, the Group has taken a proactive approach by identifying climate-related issues and alternative opportunities as an adaptive solution, which is subsequently consolidated into the transition and decarbonisation strategy for the Group.

The Group has identified ten net-zero transition opportunities for achieving the transformational change of its businesses over the long term based on current business expectations and structure. Please refer to the [Decarbonisation](#) section of this report for more information about the Group's management approaches to reducing or eliminating GHG emissions in its direct operations and wider value chain.



On-site solar panels, Hutchison Ports KICT

Embracing Innovation

The Group is at the forefront of delivering breakthrough innovations that support customers to make progress in meaningfully reducing their GHG emissions.

Aligned to the Group's [10 net-zero transition opportunities](#), the business opportunities outlined in the following table demonstrate how the Group is investing in new business models and solutions to ensure that it remains a partner of choice for customers in their pursuit of net zero.

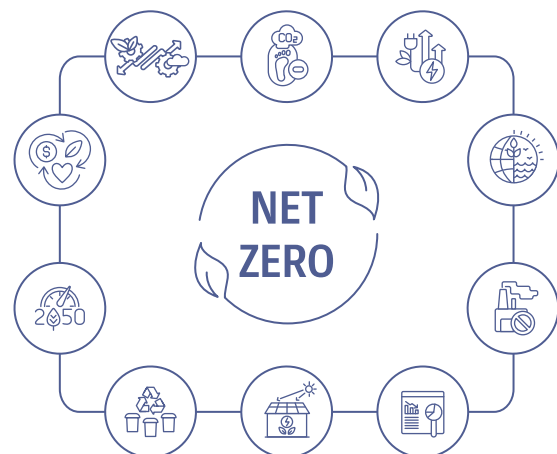


Table 2 Summary of business opportunities



Renewable and other clean energy generation

- Solar panel installation projects are installed at various Ports locations, such as Hutchison Ports MITT in Myanmar and Hutchison Ports KICT in Pakistan, Hutchison Ports BEST in Spain and HIT in Mainland China, aiming to reduce the dependency on fossil fuels and lower the carbon footprint at the terminal.
- Northern Gas Networks, Wales & West Utilities and Australian Gas Infrastructure Group (AGIG) are among the first to conduct real-world trials demonstrating how existing gas networks in the UK and Australia can be converted safely and affordably to 100% hydrogen. All three business units have long-term aims to transition their gas networks to zero carbon.
- The Group's electricity network operators are establishing as Distribution System Operators and driving innovation to enable industry-leading levels of renewable energy connections to the grid through distributed energy resources.
- Northumbrian Water is the first water company in England to successfully convert 100% of its sewage sludge into renewable energy through advanced anaerobic digestion. It currently has seven sites with solar arrays, with plans to install more. One recent site contains an array of 3,600 solar panels. It is anticipated that these developments will generate 12 million kWh of green energy per year.
- EDL and AVR helped customers to abate and avoid over 4.1 million tonnes of GHG emissions in 2023 across their large portfolios of landfill gas, waste coal mine gas, waste-to-energy and hybrid renewable sites globally.
- Wind Tre and 3 Austria are working together with local partners to offer customers renewable electricity and certified carbon-neutral gas.



Clean transportation

- 3 Denmark is leveraging the combined power of data and connectivity to provide insights into efficient transport network planning and tools supporting the optimisation of public transport, electric vehicle infrastructure and energy systems.
- With around 80% of its rolling stock already electric or bi-modal, UK Rails is well-positioned to be a partner of choice in the UK transport industry's journey to net zero. In 2023, the company conducted a series of investigations exploring emissions reduction opportunities on diesel-electric trains, including engine efficiency modifications, new lithium-ion batteries, replacement of existing cabin heating, ventilation and air conditioning (HVAC), and dual fuels and alternative fuels. UK Rails also proceeded with its study on the feasibility and safety of hydrogen-powered trains and an upgraded engine to minimise operational emissions. In the coming year, the company is targeting a first-in-class trial on an intelligent engine start-stop system and completing its investigation on opportunities for enhanced HVAC on eco-mode.



Energy efficiency and smart city solutions

- CKDelta, the Group's data innovation and artificial intelligence business, has built expertise in understanding how all elements of the electric vehicle ecosystem interact, helping market participants such as power distributors, charge point operators and other companies in this complex rollout, thereby acting as an enabler of the transition to electric vehicles.
- Hutchison Telecommunications Hong Kong Holdings Limited (HTHKH) launched DIGIBOX with seven dedicated zones showcasing innovative 5G applications that empower enterprises to transform digitally.
- ista is one of the world's leading companies in providing products and services for greater energy efficiency, specialising in digital sub-metering and energy management systems. It offers innovative energy efficiency solutions for customers to monitor their consumption and carbon footprints.
- Wind Tre has continued to expand its programme of partnerships with Italian cities, to integrate digitalisation for smart cities. The programme supports a green transition, leveraging 5G-connected innovation to drive energy efficiency and smart mobility, alongside other solutions. This programme is delivering on Wind Tre's business goal to be the "smart partner of 100 smart cities", and has engaged over 25 city projects up until 2023.





Telecommunications

SHOWCASING SMART CITIES APPLICATION

Recognising the importance of mobile networks and IoT connections in the smart city transition of Hong Kong, DIGIBOX, the solution hub of 3 Business which is the corporate business brand of HTHKH, was launched to showcase state-of-the-art 5G solutions, creating unprecedented and future-shaping opportunities for enterprises. From technologies like AI, blockchain, the cloud and big data to edge computing, 5G plays a vital role in the functioning of these applications and enabling ever more possibilities. DIGIBOX features seven dedicated zones, namely Smart City, Smart Port, Smart Retail, Smart Education, Smart Care, Smart Restaurant, and AI & Future. Each zone showcases innovative 5G applications that empower enterprises to transform digitally, which includes solutions such as the convergence of mobile and technologies.



Climate Adaptation

It is essential for the Group to protect its employees and assets by adapting to the unavoidable consequences of climate change. All divisions are conducting separate assessments according to their business environment.

Adaptation measures are equally important for robust risk management against climate-related risks. The Group's Infrastructure division has advanced the technical design standard to enhance resilience and implemented flooding mitigation solutions such as water-resistant bunding, flood gates and temporary flood barriers at affected UK Power Networks assets in the event of a flooding emergency. In addition, the Infrastructure division has completed a climate scenario analysis assessment

and worked diligently to align to the recommendation of the TCFD, identifying the climate-related risks and opportunities that it may encounter, which has helped the assessment of the potential financial implications of these factors on operations. For details, please refer to the CKI's [Sustainability Report 2023](#).

Hutchison Ports has completed a global climate risk assessment, and alongside other business divisions of the Group, has engaged an external consultant in 2023 to assist in enhancing its and conduct a gap analysis, with the aim of reinforcing its current climate-related strategy to align with the highest standards so as to disclose its ESG-related issues in its subsequent sustainability reports.

Climate-Related Financial Disclosures

The Group has aligned its approach to reporting on climate change with the framework from the TCFD. Its inaugural [2021 TCFD Report](#) was published in 2022, structured around 11 recommended disclosures and covering four core thematic areas of Governance, Strategy, Risk Management and Metrics & Targets. The Group is also committed to continuously improving the coverage and quality of each iteration of its TCFD Report.

Following the footsteps of the Group, the Infrastructure and Telecommunications divisions also engaged external consultants

to conduct its TCFD assessment. CKHGT also published its first standalone [TCFD report](#) in 2023, and worked with a third-party expert to further prioritise material climate risks and opportunities and perform high-level quantitative modelling in 2023. CKHGT will further report on the outcome of this analysis during 2024. Other business divisions are also engaging external consultancy in working on their own TCFD report towards a subsequent year disclosure.



Infrastructure

ALIGNING WITH THE TCFD REPORT RECOMMENDATIONS

In 2023, the Infrastructure division took another step forward after completing its TCFD report in 2022. Aligning with recommendations from the TCFD assessment, it has started implementing initiatives to review and enhance its Sustainability Framework, policies and disclosure and to conduct a standalone climate scenario analysis. The analysis exercise provides an insight into business resilience against inherent uncertainty, and it identifies climate-related risks and opportunities that stem from the physical and transition impact of climate change. The result also helps reveal potential financial implications for strategically significant businesses over time, as it can enhance the strategy and decision-making processes and further improve the sustainability of the operation.

Implementing initiatives to review and enhance its Sustainability Framework, policies and disclosure and to conduct a standalone climate scenario analysis



Group

MANAGING UPCOMING DISCLOSURE CHANGES

Corporate ESG and sustainability performance has become increasingly important for the Group's stakeholders. Emission reduction, goals and targets and circular economy are topics of concern for investors and rating agencies, as the result can potentially impact the availability of economical financing options.

Stricter and more comprehensive disclosure requirements are under development, with the requirements varying

from jurisdiction to jurisdiction. For example, the Corporate Sustainability Reporting Directive from the EU and the adoption of the International Sustainability Standards Board by the HKEX were both introduced and were added to the local regulatory disclosure requirements, to be implemented in 2024 and 2025 respectively. As a global operator, the Group is closely monitoring these changes and has engaged an independent consultant to assist in conducting a gap analysis and preparing the necessary actions to ensure full compliance.

SOCIAL INCLUSION

Sustainable businesses recognise their roles in improving opportunities for marginalised groups and seek to respond proactively by nurturing diversity and inclusivity in the way they manage their operations and through the products and services they deliver to their customers.

The Group understands its role in promoting social inclusion and working with local partners to support targeted groups in the community. Young children and seniors are often excluded and unable to fully embrace the ongoing evolution in the digital world. The Group's business units look to outreach to these under-supported groups and are dedicating resources to minimise the digital divide.



Telecommunications

SERVING YOUNG CHILDREN

NeoConnessi is a digital and media education project aimed at spreading awareness within Italian primary schools about the risks and opportunities of being online. With the key initiative of Wind Tre's ESG Plan Goal 1 "Families 100% aware and protected", the project is not only offering insights, technical prevention and safety guidance but also a Facebook group which allows users to converse and find answers to questions related to the most current online-related issues for children, providing valuable support to start a constructive dialogue on the use of digital assets, even at home.

In 2023, Wind Tre launched "The Decalogue of NeoConnessi" which listed 10 principles for improving the awareness of internet users, regardless of their age or experience. This is a commitment of shared responsibility that aims to help and encourage respectful behaviour when online, with the aim of making the internet a welcoming and safe place for everyone, offering ideas to the educational community that allow them to set up and manage a relationship with their children (a Trust-based network).

Since 2018, the project has benefited over 1 million students, reaching more than 38,000 classrooms and training over 6,700 teachers. The Decalogue is a resource that can be consulted by everyone and is available [online](#).



Digital Inclusion

As the world gradually recovers from the impact of COVID-19, people have also got more comfortable working remotely and accessing various services through the assistance of digital connected devices. The topic of connectivity and digital accessibility has become more integrated into people's daily lives, but certain groups, especially the under-privileged, are at a disadvantage regarding the digital movement due to online inaccessibility and data poverty. The Group has recognised this issue, and the Telecommunications division has been providing support, especially to vulnerable groups, to provide solutions and ease their daily needs.

Senior and disadvantaged citizens

One area of focus in the Telecommunications division is reducing barriers for senior citizens. Wind Tre, for example, has launched a "senior" version of NeoConnessi aimed at actively contributing to the digital inclusion of older people by training them in basic digital skills. Wind Tre is also collaborating with Comarch Italia to improve the quality of life and daily safety of the most fragile by providing SIM-enabled bracelets to connect disabled people with their caretakers through digital health monitoring devices. 3 Hong Kong has extended its Lo-Yau-Kei Monthly Service Plan Sponsorship in 2023, aiming to continue supporting the elderly to access its services through "Safety Phones and data" services. It also works with the Tung Wah Group of Hospitals and provides a 12-month free mobile service to members of the Victim-for-Victim Project.

Remote community access

Helping to close rural-urban connectivity gaps that persist in many markets serviced by the Group is another priority for the Telecommunications division.

3 UK has a target to reach 90% geographical coverage of the UK by 2027. It is working with the UK government and other mobile operators on the Shared Rural Network to provide guaranteed coverage which will involve 280,000 additional dwellings and 16,000 additional kilometres of rural roads. 3 UK is also extending its partnership with UK National Databank, run by digital inclusion charity Good Things Foundation, by doubling its pledge to 2 million GB of data, which will help an estimated 80,000 people to get connected over the next few years. Similarly, Wind Tre has also participated as a partner to the festival of "Borghi più belli d'Italia" (most beautiful villages in Italy) and is acting as one of the main sponsors, with a Panel on its Goal "Connected Villages" to accompany the growth of small Italian municipalities through digital connectivity and smart technologies.



Mobile phone workshop for senior citizens, 3 Hong Kong

SUSTAINABLE PRODUCT CHOICES

The Group strives to source and design products with circular economy principles in mind, and to offer its customers sustainable product choices in their everyday lives. As part of the Group's commitment under the Group Sustainability Framework, which is under SDG 12 (Responsible consumption and production), it focuses on identifying solutions to decouple business growth from environmental degradation by "doing more and better with less".

This topic on Sustainable Choices is closely linked with other material topics in the Group Sustainability Framework, including:

- [Supply Chain Responsibility](#) 
- [Circular Economy](#) 

Consumer Preferences

The Retail division has observed that shoppers are becoming more cautious about the sustainability-related details on purchased products, as information such as environmental impact, product recyclability and its production process are becoming general concerns shared by its customers. A previous survey conducted by Superdrug, which measures brand values and customer connection,

revealed that more than 50% of respondents prioritise the ethics of beauty and personal care brands when making their selection. In response, the Group's Retail division has been regularly reviewing its supply chain and the production process according to the customers' needs.



Retail

SUSTAINABLE CHOICES AT WATSONS

Watsons relaunched its Sustainable Choices campaign in 2022 to highlight products with reduced environmental impact from both Watson's Exclusive Brands as well as other brand partners.

In close collaboration with brand partners, including Procter & Gamble, L'Oréal, Shiseido, Beiersdorf, GlaxoSmithKline, Johnson & Johnson, Kao, Reckitt, and Unilever, Watsons continue to increase the number of sustainability attributes to market both in-store and online, from 9,000 products in 2022 to 9,700 products in 2023. Its Sustainable Choices filter and labelling system organises the products into four categories:

- Clean beauty - formulated with ingredients shoppers can trust and with additional reduced environmental impact
- Refill, reuse or replace - resulting in less waste
- Better ingredients or materials - ingredients (formulated) or materials (non-formulated) that help to protect biodiversity and/or reduce waste
- Better packaging - options that help to protect biodiversity and/or reduce waste





SUSTAINABLE CHOICES IN COMMUNICATION

Wind Tre has adopted a new type of SIM since 2022, as it is 50% smaller than a standard SIM and is made with 100% recycled plastic, which employs a production process that eliminates CO₂ emissions. The plastic with which this SIM card is made comes from the polystyrene recovered from refrigerators disposed of by consumers. The recycled product is broken down into raw material, which will later be used to make the “finished” SIM card.



100% recycled plastic SIM card, Wind Tre

Customer Engagement in the Circular Economy

Consumer participation is essential for driving the circular economy. Take-back programmes, for example, are an increasingly important way for businesses with retail operations to engage with consumers on implementing shared solutions to environmental challenges.



Active engagement with retail customers, Drogas Latvia



Retail

INTRODUCING REFILL AND TAKE-BACK SERVICES THROUGHOUT ASIA

The Group's Retail division is leading the way on collecting and recycling empty containers for personal care and cosmetics products, and water bottles. In partnership with major brands, such as Proctor & Gamble and L'Oréal, it has introduced take-back schemes in both the Asia and Europe markets. In 2023, over 500 refill stations of Selective Brands and Supplier Brands were available.

Market	Collection of empty containers	In-store Refill*
Asia		
Hong Kong	Watsons, PARKnSHOP	Watsons, PARKnSHOP
Indonesia	Watsons	-
Malaysia	Watsons	Watsons
Philippines	Watsons	Watsons
Singapore	Watsons	Watsons
Thailand	Watsons	-
Europe		
Belgium	ICI Paris XL	-
Netherlands	ICI Paris XL	-
United Kingdom	Superdrug, The Perfume Shop	The Perfume Shop

Note *: for a selection of products

In Hong Kong, Watsons has implemented plastic packaging collection and recycling for cosmetic and makeup products in all stores city-wide under its "Beauty for the Future" campaign. In 2023, it collected over 19.6 tonnes of empty containers, mainly glass (57%) and plastic containers (43%). The division has also launched a city-wide plastic bottle container collection programme in Hong Kong, placing reverse vending machines in public spaces throughout the city.

Watsons Philippines continues to partner with Plastic Bank and collected 50 tons of plastic waste in 2023. Since the partnership began in 2022, 100 tonnes of plastic has been collected. This is equivalent to 5,000,000 plastic bottles prevented from polluting the oceans. Moreover, the collaboration has provided a means of livelihood to members of coastal communities by employing them as plastic collectors. Over 600 lives have been changed from more than 80 communities through this programme.



over
13,400
tonnes

Across AS Watson, over 13,400 tonnes of empty containers (mainly plastic) were collected and recycled in 2023



Plastic packaging and bottle container collection station in Watsons Hong Kong.

The Telecommunications division has implemented take-back programmes for mobile devices in most major markets. In response to changing consumer expectations, it is also embracing new business opportunities in the sharing economy, exploring device-as-service solution models that transform the life-cycle dynamic of device use and maintenance beyond the point of sale.

3 Austria, 3 Denmark, 3 Sweden and Wind Tre continue to provide a sustainable choice of smartphone trade-in option for their customers, offering refurbished smartphones at a

discounted price, which can result in lesser e-waste generation from raw materials and final products being delivered to the landfill. 3 UK offers "Three Recycle" and "Three Reconnected" as device take-back solutions, and 3 Hong Kong continues to offer recycling services for its customers through the "Recycling Handsets and Accessories Programme". Items collected under this programme (such as batteries, chargers, headphones, earpieces, USB cables and stylus pens) are passed on to the Computer and Communication Products Recycling Programme, run by the government, or are donated to people in need.



Telecommunications

DONATIONS FOR SECOND LIFE

Cooperating with the organisation "PCs for All", 3 Austria has been collecting refurbished hardware and IT equipment and providing a second life for these used items. In 2023, the programme collected over 1,300 laptops and monitors and benefited the same amount of disadvantaged group members.

