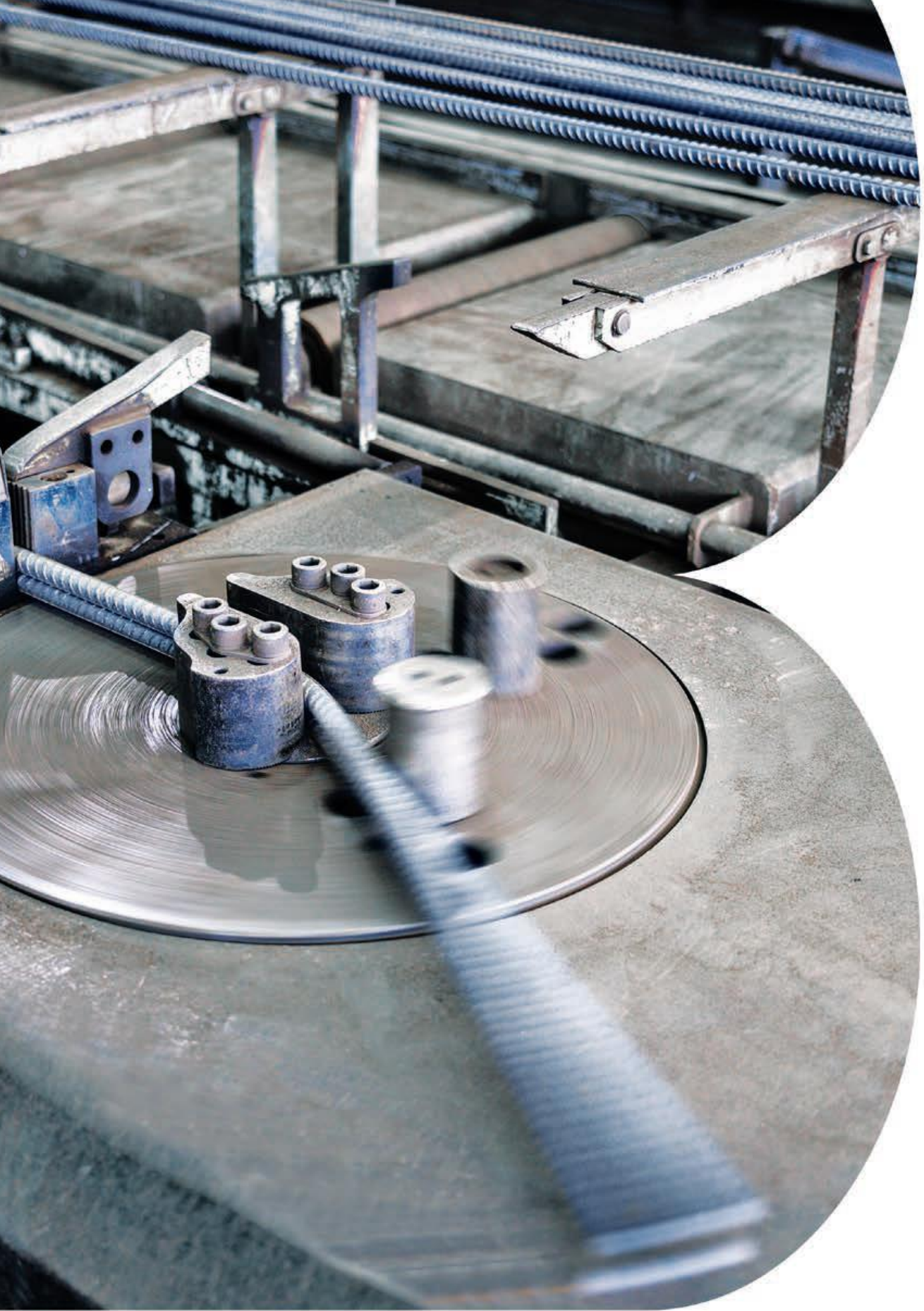




BUILDING BETTER
SUSTAINABILITY REPORT 2021



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ABOUT US

Incorporated in 1938, BRC Asia Limited ("BRC") is a leading Pan-Asia prefabricated reinforcing steel solutions provider headquartered in Singapore and listed on the Singapore Stock Exchange.

BRC offers a full suite of reinforcing steel products and services that include standard length rebar, cut and bend services, prefabrication services as well as standard and customised welded wire mesh for the building and construction industry.

By transferring laborious and unproductive in-situ steel fixing work to factory fabrication, substantial benefits in on-site manpower savings, shorter construction cycle, better buildability and productivity can be achieved for the builder, leading to a better outcome for all stakeholders.

ABOUT THE REPORT

This is the fourth sustainability report by BRC. It details our continuous effort in our sustainability reporting journey, covering Environmental, Social and Governance ("ESG") performance in our Singapore operations from 1 October 2020 to 30 September 2021 ("FY2021").

This report is based on the principles and requirements in the Sustainability Reporting Guide of the Singapore Exchange Securities Trading Limited ("SGX-ST") and prepared with reference to the GRI Standards.

The statistical data disclosed in this report are derived from our own statistics. We have adopted a phased approach to our reporting; we will seek to provide additional disclosures and consider external assurance as our sustainability reporting matures over time. A historical comparison to the previous years is presented where possible. We will continue to assess and improve our data collection over time. Moving forward, we will continue to publish an annual sustainability report. The report can be viewed on our website at <http://www.brc.com.sg>.

We welcome feedback from our stakeholders with regards to our sustainability efforts. Please send your feedback to info@brc.com.sg



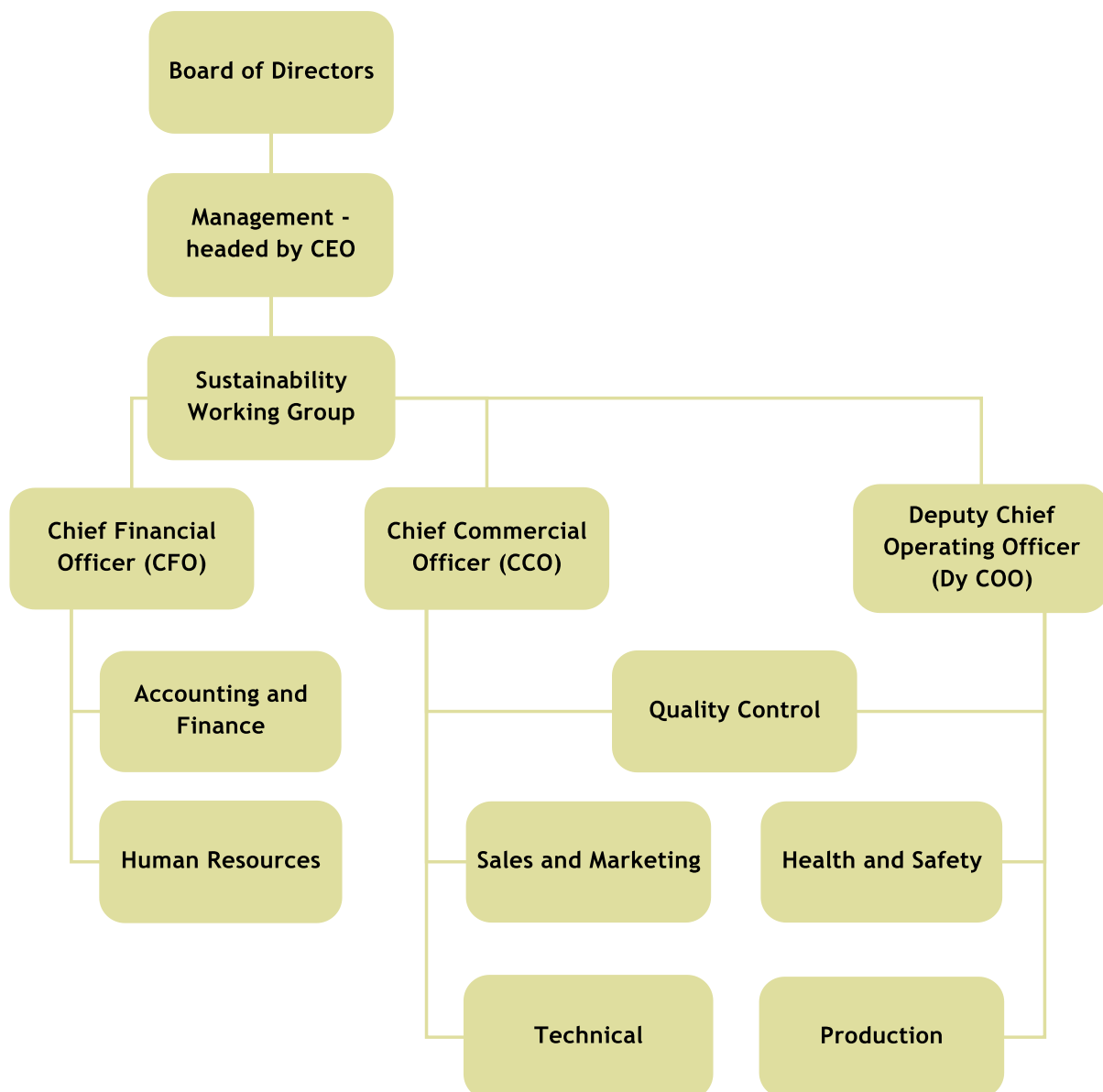
SUSTAINABILITY AT BRC

BOARD STATEMENT

The primary role of the Board is to protect and enhance long-term shareholder value. It remains at the heart of every business and sets BRC's overall strategic objectives. We believe that enhancing our focus on sustainability will place BRC in a better position to create value for shareholders while looking after the broader stakeholder community. We do what is right for both our business and the society we are part of. Under the direction of the Board, our sustainability policies and practices for our material ESG factors have been formulated and aligned with best-in-class standards. Together with the Board, our Management remains vigilant in managing our commitments to sustainability efforts to ensure sustainable growth and development of the communities where we operate.

SUSTAINABILITY GOVERNANCE

Under the leadership of our Board of Directors, a Sustainability Working Group has been formalised, of which is led by the Chief Executive Officer ("CEO"). The Sustainability Working Group is supported by various departments and works closely with the Board in implementing the BRC's sustainability efforts and evaluating the performance for future successes.



SUSTAINABILITY AT BRC

STAKEHOLDER ENGAGEMENT

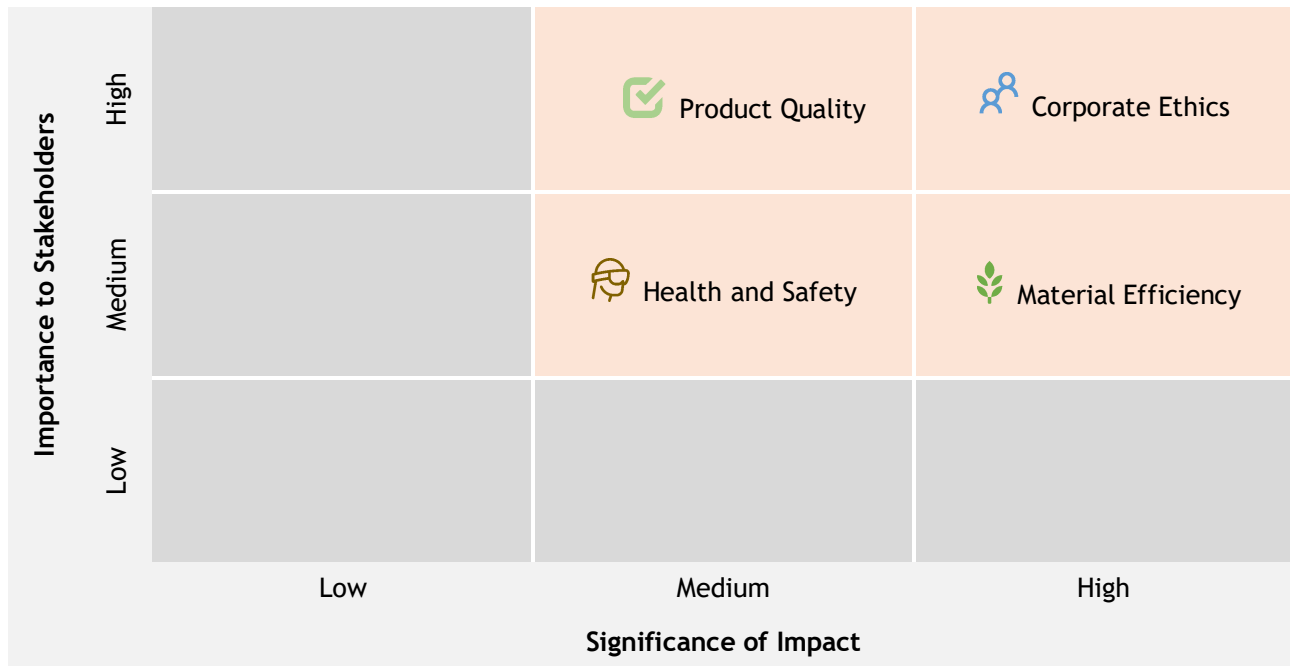
BRC considers stakeholders as entities or individuals that can reasonably be expected to be significantly affected by our activities, products and services, or whose actions can reasonably be expected to affect the ability of BRC to successfully implement our strategies and achieve our objectives. It is our priority to give the best to our stakeholders and create value for them. In our day-to-day operations, we have established close contact with our key stakeholder groups, to better understand their expectations. We detail below how we engage with them, their key concerns, and our responses.

| Stakeholders | Frequency | Modes of engagement | Key Concerns | Our Responses |
|-------------------------|---|--|---|---|
| Investors | <ul style="list-style-type: none"> Quarterly Ad-hoc | <ul style="list-style-type: none"> Regular updates through announcements on SGXNet and BRC's website Annual General Meetings Annual Reports Sustainability Reports | <ul style="list-style-type: none"> Financial stability Growth and markets strategy Corporate governance Compliance with laws and regulations Transparency and timely announcements | <ul style="list-style-type: none"> Identify and manage risks promptly Explore growth opportunities both locally and overseas that will strengthen our core business as well as enhance the scalability of our Singapore reinforcing steel model internationally Adherence to Code of Corporate Governance 2018 where possible Timely and detailed announcements, press releases and follow-up of major events |
| Customers | <ul style="list-style-type: none"> Ad-hoc Annually | <ul style="list-style-type: none"> Face-to-face meetings Customer feedback survey | <ul style="list-style-type: none"> Compliance with terms and conditions of contracts Volatility of steel price Product quality Timely delivery | <ul style="list-style-type: none"> Adherence to terms and conditions of contracts Contracts based on fixed price for projects structural duration or contracts based on Building and Construction Authority ("BCA") fluctuation price to protect customers from steel price volatility Strict adherence to product quality standards Just-in-time delivery |
| Suppliers | <ul style="list-style-type: none"> Ad-hoc Annually | <ul style="list-style-type: none"> Face-to-face meetings Supplier Assessment | <ul style="list-style-type: none"> Ability to make payment at the stipulated deadline Compliance with terms and conditions of contracts | <ul style="list-style-type: none"> Payments are monitored closely by the procurement and finance department Adherence to terms and conditions of contracts |
| Government institutions | <ul style="list-style-type: none"> Ad-hoc | <ul style="list-style-type: none"> One-to-one meetings Surveys Dialogue | <ul style="list-style-type: none"> Ability to meet the needs of the market - capacity, productivity, quality, safety, sustainability | <ul style="list-style-type: none"> Staying responsive to demands of the industry |
| Employees | <ul style="list-style-type: none"> Ad-hoc Annually | <ul style="list-style-type: none"> Direct feedback to managers Performance reviews Training | <ul style="list-style-type: none"> Workplace health and safety Fair remuneration and benefits | <ul style="list-style-type: none"> Strict adherence to Health and Safety policies and practices Safety training Fair human resource policies and practices |

SUSTAINABILITY AT BRC

MATERIALITY ASSESSMENT

We conducted our materiality assessment exercise with key members of our Management for our inaugural sustainability report and reviews were done for each subsequent financial year. No new topics were identified during the review. The issues that have been identified as material to us are economic, environmental and social issues that reflect significant impacts of our operations, or could substantively influence the assessments and decisions of our Stakeholders. BRC gathers issues of concern internally from management teams as well as operational units. Four material topics have been identified, which were approved and validated by the Board.



For the sustainability matters determined as material, we have mapped them to the relevant aspects defined in GRI Material topics.

| Material Sustainability Matters | Material Topics (GRI) | Our Responses |
|---------------------------------|------------------------------------|-----------------|
| Corporate Ethics | 205 Anti-Corruption | Our People |
| Health and Safety | 403 Occupational Safety and Health | Our People |
| Product Quality | 417 Marketing and Labelling | Our Value Chain |
| Material Efficiency | N.A. | Our Environment |

OUR PEOPLE

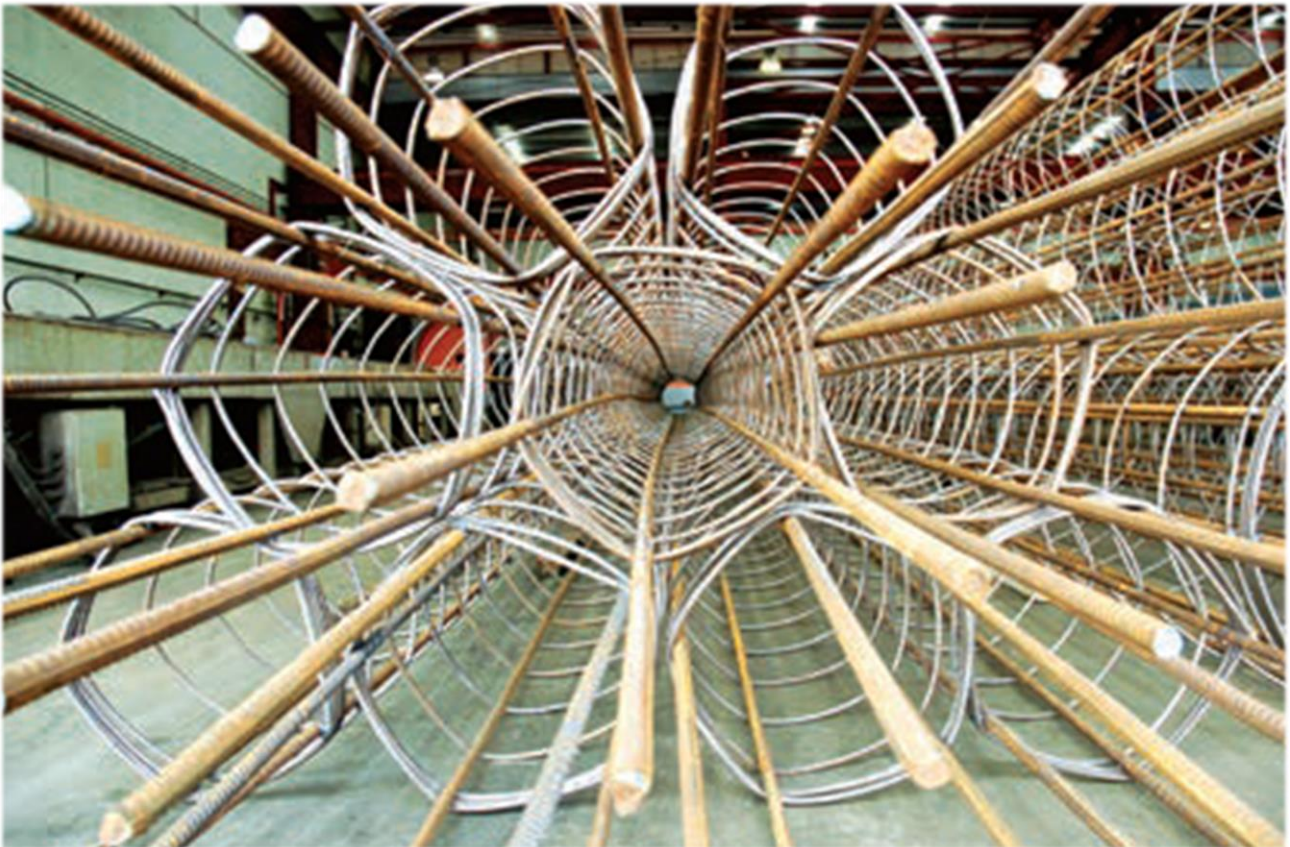
CORPORATE GOVERNANCE

BRC is committed to achieving high standards of corporate governance and transparency practices. We believe that good corporate governance is imperative to the sustained growth and long-term success of our business.

BRC is headed by its effective Board comprising professionals of various disciplines and entrusted with the responsibility for the overall management of BRC. To assist the Board in the discharge of its oversight function, various board committees have been constituted to operate under the defined terms of reference. The Board is supported by the Audit Committee in the review of the material internal control procedures, comprising financial, operational, compliance and information technology controls. The Remuneration Committee oversees the level and structure of remuneration to attract, retain and motivate the Directors and key management personnel. The Nominating Committee recommends to the Board on relevant matters relating to review of board succession plans and the development of a process for evaluation of the performance of the Board, the Board Committees and individual Directors.

We have in place a framework of controls and policies; while adopting the best-in-class practices that reflect our commitment to accountability, transparency and protection of shareholders' interests. Our internal policies and procedures ensure that our activities and operations comply with existing regulatory requirements, and we regularly monitor, evaluate and audit the processes to ensure that they remain robust to meet the challenges of our activities and operations.

Please refer to the Corporate Governance report in the Annual Report for more information.



OUR PEOPLE

CORPORATE ETHICS

Upholding corporate ethics is a cornerstone of our business success. While promoting fair dealings with our customers, suppliers and community, our policies and procedures have guided our employees to carry out their duties in a responsible and ethical manner. We do not tolerate any form of misconduct and have disciplinary measures in place in the event an employee is found to have breached our policies and procedures.

Code of Conduct

Our Code of Conduct defines our standards of integrity and ethics from our employees, which determine how we do business. The following acts or omissions serve as examples of misconduct for which an employee is subject to disciplinary action:

1. Theft of Company's property or property of another employee in company premises.
2. Fighting or intimidation including provoking, instigating a fight or assault.
3. Wilful destruction of Company's property or the property of another employee.
4. Falsification of personnel or other records.
5. Disclosure of classified materials to unauthorised persons.
6. Conviction of a crime.
7. Contravening safety cardinal rules.



Dealing in the Company's securities

BRC's internal code pursuant to Rule 1207(19) of the Listing Manual issued by SGX-ST is in place and there has not been any incidence of non-compliance. The Company has informed its officers not to deal in the Company's shares whilst they are in possession of unpublished material and price-sensitive information and during the period commencing one month before the announcement of the Company's half year and full year results and the period commencing two weeks before the voluntary announcement of the Company's results for the first and third quarters.

Directors and officers are also advised to observe insider trading provisions under the Securities and Futures Act (Chapter 289) at all times even when dealing in the Company's securities within the permitted periods. Directors of the Company are required to report all dealings to the Company Secretary.

Anti-corruption and Whistle-Blowing

Business dealings must be handled with integrity, transparency and honesty. BRC takes a strong stance against corruption and does not tolerate corruption in any part of its business.

Representatives of the Company shall not offer stakeholder groups any rewards or benefits in violation of applicable laws or established business practices in order to obtain or retain business or to gain any other improper advantage.

Our employees shall not accept any payments, gifts, reimbursements or benefits-in-kind from parties that could affect their objectivity in their business decisions.

BRC has put in place a whistle-blowing policy and the Audit Committee has the authority to conduct independent investigations into any complaints. The whistle-blowing policy provides a mechanism for employees to report malpractices in the workplace to the appropriate person, and for the necessary follow up action to be taken on such a report. The Audit Committee oversees the administration of whistleblowing policy. Periodic reports will be submitted to the Audit Committee stating the number of and details of complaints received, the results of the investigations and follow-up actions.

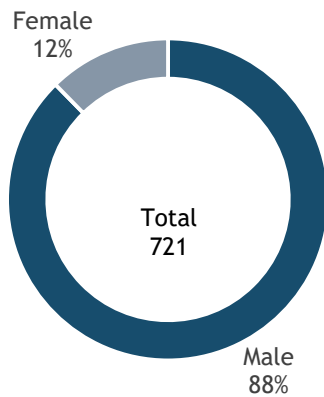
For FY2021, no reports of fraudulent or inappropriate activities or malpractices have been received. In addition, no instances of corruption were reported.

OUR PEOPLE

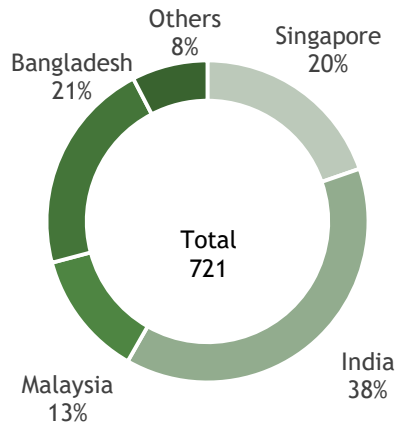
PROFILE OF THE WORKFORCE

People are the driving force of every high performing company, and so is it at BRC. As at 30 September 2021, we were a team of 721 permanent employees for our Singapore operations. Due to the nature of our business, majority of our employees are male workers from India and Bangladesh. Among our workforce within our Singapore operations, 18% are covered by collective bargaining agreements.

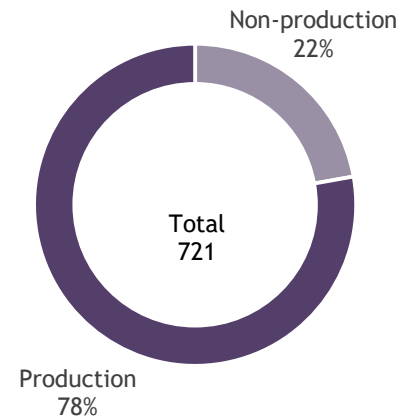
Employees by Gender



Employees by Region



Employees by Category



Employees by Employment Type by Gender and Region

| | Singapore (142) | | Malaysia (91) | | India (278) | | Bangladesh (155) | | Others (55) | |
|--------------|-----------------|-----------|---------------|-----------|-------------|------------|------------------|------------|-------------|-----------|
| | Female | Male | Female | Male | Female | Male | Female | Male | Female | Male |
| Full-time | 51 | 89 | 16 | 75 | - | 278 | - | 155 | 20 | 35 |
| Part-time | 2 | - | - | - | - | - | - | - | - | - |
| Total | 53 | 89 | 16 | 75 | - | 278 | - | 155 | 20 | 35 |

Employees by Category by Gender

| | Female | Male | Total |
|----------------|-----------|------------|------------|
| Non-production | 87 | 73 | 160 |
| Production | 2 | 559 | 561 |
| Total | 89 | 632 | 721 |

OUR PEOPLE

HEALTH AND SAFETY

Our employees are our biggest asset and foundation of our business. Given the nature of our operations, the health and safety of our employees may be at risk. As such, workplace health and safety is of utmost importance to us.

We have attained bizSAFE Level Star standards for our manufacturing entities. Every employee in BRC plays a crucial role in our safety management system. While the Safety Chairman and Management are directly tasked with driving our safety practices, our employees have also been highly encouraged to be actively involved in improving our safety standards through initiatives such as the weekly Tool Box meeting. We have formed a Health and Safety Committee comprising workers from different areas of our operations. The Health and Safety Committee closely supervises adherence to safety protocols with Management gathering timely feedback from the ground while actively monitoring the efficiency of our safety programs, allowing further improvements to be made.

Health and Safety Governance Structure



At the onset of the Covid-19 outbreak in January 2020, management had already started the contingency planning in preparation for the worst-case scenario in Singapore. This preparedness contributed to our relative calmness and orderly response when the "circuit breaker" measures kicked in. We reviewed our operations and implemented measures to ensure safety and well-being of our employees. Procedures For Precautionary Measures Against Disease were drawn up in response to Covid-19 scenarios and disseminated. Each one of our worker dormitory went into self-imposed isolation to minimise the risk of contracting and spreading the infection. Members of the management team were also not allowed to physically enter the dormitories. Precautionary and safety measures were implemented and enforced strictly by our selected employees who underwent the courses for Safe Management Officers and Safe Distancing Officers. Masks were issued to our employees, thermal scanners were installed at our offices and cleaning services of common office areas were stepped up. Advisories were also communicated on the latest developments in Singapore and our work arrangement plans.



OUR PEOPLE

BRC recorded zero workplace fatalities and a total of 34 non-fatal workplace injuries¹ for FY2021. Non-fatal injuries were mainly due to slips, trips and falls, work-related traffic accidents, falls from height and machinery incidents. Through continuously strengthening our safety programs and trainings, our target is to lower the Accident Frequency Rate² ("AFR") and Accident Severity Rate³ ("ASR") in the upcoming years. As our employees work in conditions that possess inherent accident risks, we strive to improve the safety standards of the workplace environment to prevent injuries.

| Health and Safety Indicators | FY2019 | FY2020 | FY2021 |
|---|--------|--------|--------|
| Non-fatal workplace injuries | 43 | 15 | 34 |
| Accident Frequency Rate | 12.8 | 8.2 | 14.3 |
| - Major Injury ⁴ Frequency Rate | 5.6 | 6.0 | 5.9 |
| - Moderate Injury ⁵ Frequency Rate | 2.4 | 1.1 | 2.9 |
| - Minor Injury ⁶ Frequency Rate | 4.8 | 1.1 | 5.5 |
| Accident Severity Rate | 319.4 | 246.7 | 330.24 |

Key safety activities

| | | | |
|--|---|--|--|
| Safety talks to educate workers about past safety performances and future expectations. Feedback channels are provided for workers to suggest ideas on improving safety within factories. Safety banners are placed at different locations within the factories. | Train and educate workers on the importance of practicing safe habits e.g. Weekly Tool Box meeting, talks on dengue fever, haze, etc. | Provide proper facilities, equipment and safety Personal Protective Equipment ("PPE") to workers and ensure their correct use. | Machine noise mapping exercise and dosimetry assessment to identify work zones with high risk of noise-induced deafness for workers and enhanced PPE provided to workers to mitigate the risk of noise induced deafness. |
| Daily walkabouts by Health and Safety Committees and monthly safety inspections to ensure compliance. | Timely analysis of accidents for immediate preventive measures. | Continuously track and improve workplace traffic safety management. | 24 hours medical coverage for all workers. |

¹A workplace injury is any personal injury or death resulting from a workplace accident that results in more than 4 man-days lost and includes work-related traffic injuries.

²Accident Frequency Rate = (No. of Workplace Accidents Reported / No. of Man-hours Worked) x 1,000,000

³Accident Severity Rate = (No. of Man Days Lost To Workplace Accidents / No. of Man-hours Worked) x 1,000,000

⁴Major injury is any injury requiring medical treatment and medical/hospitalisation leave of more than 20 days, including amputations, major fractures, multiple injuries, or life-threatening occupational disease such as occupational cancer, acute poisoning.

⁵Moderate injury is any injury requiring medical treatment and medical/hospitalisation leave of more than 10 days and up to 20 days, leading to disability and includes minor fractures, dermatitis, deafness, and work-related upper limb disorders.

⁶Minor injury is any injury or ill-health requiring medical treatment and medical leave of more than 4 days and up to 10 days, including lacerations, burns, minor cuts, bruises, irritation, sprains, ill-health with temporary discomfort.

OUR VALUE CHAIN

✔ PRODUCT QUALITY

Maintaining high quality standards in all our products is critical to reduce the risks and costs of replacing faulty goods. In doing so, we are able to maintain and enhance our reputation, and secure long-term revenue and profitability, thus ensuring the sustainability of our business.

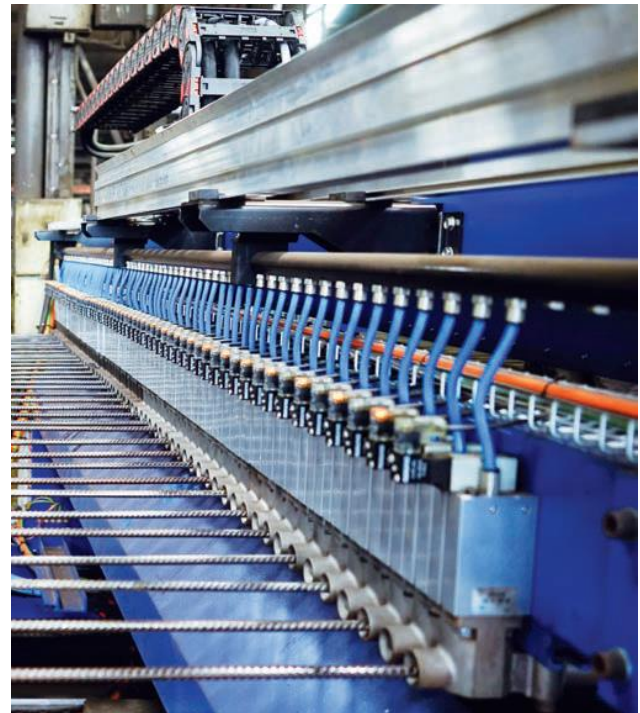
In compliance with ISO 9001:2015, Quality Management System, our ISO Management team ensures awareness of the company's quality policy and objectives throughout BRC, and communicates the importance of meeting customers as well as statutory and regulatory requirements. We continuously train our workers to improve their competencies, while conducting frequent management review on our Quality Management System. This includes annual internal audits involving all the Department Heads to ensure the integrity of the system.

In addition to our robust internal Quality Management System, we ensure that the suppliers we source from also uphold high quality standards. We understand that working with our suppliers is key to advancing our sustainable goals. In FY2021, we sourced from direct mills and traders who complied with the British Standard for Reinforcing Steel BS4449:2005 or Singapore Standard for Reinforcing Steel SS560:2016. Our major suppliers included local suppliers as well as suppliers from China, Turkey, Middle East, India and South East Asia. We constantly monitor and evaluate our suppliers' performance before signing new contracts.

Customer returns were mainly related to issues in order processing, data entry and logistics. Immediate corrective actions have been taken to rectify the issues.

Product quality commitments

- Excellent Quality & Services
- Just-in-time Delivery
- Competitive Pricing



Percentage of customer returns

| FY2019 ¹ | | FY2020 | | FY2021 | | FY2022 |
|---------------------|--------|---------|--------|---------|--------|--------|
| Results | Target | Results | Target | Results | Target | Target |
| 0.06 | < 0.10 | 0.12 | < 0.20 | 0.04 | < 0.19 | < 0.18 |

¹With effect from FY2020, we have widened the scope of assessment for customer returns to include returns due to reasons such as orders requiring re-work. FY2019 comparative figures have not been restated as information based on revised reporting is not available.

OUR ENVIRONMENT

MATERIAL EFFICIENCY

Material efficiency concerns the use of materials or physical processes that employ less material, produces more finished products and hence generates less waste. As material efficiency and energy efficiency are interrelated, using materials efficiently will also result in a decrease in energy and consequent CO₂ emissions, leading also to overall cost savings for the company. Hence, we are committed to closely monitoring the generation of scrap in all our production processes at all locations.

We source raw materials according to customers' requirements, with the aim of reducing wastage during manufacturing. We also instil in our workers the mindset of "doing it right the first time" to reduce scrap from customer returns. In addition, we continually optimise our manufacturing operations to reduce scrap material. Steel scrap generated from production is subsequently sold to steel scrap collectors as part of our materials management effort. To ensure that scrap metal is disposed safely, we do not sell to steel scrap collectors that have not obtained the General Waste Disposal Facility license issued by National Environmental Agency.

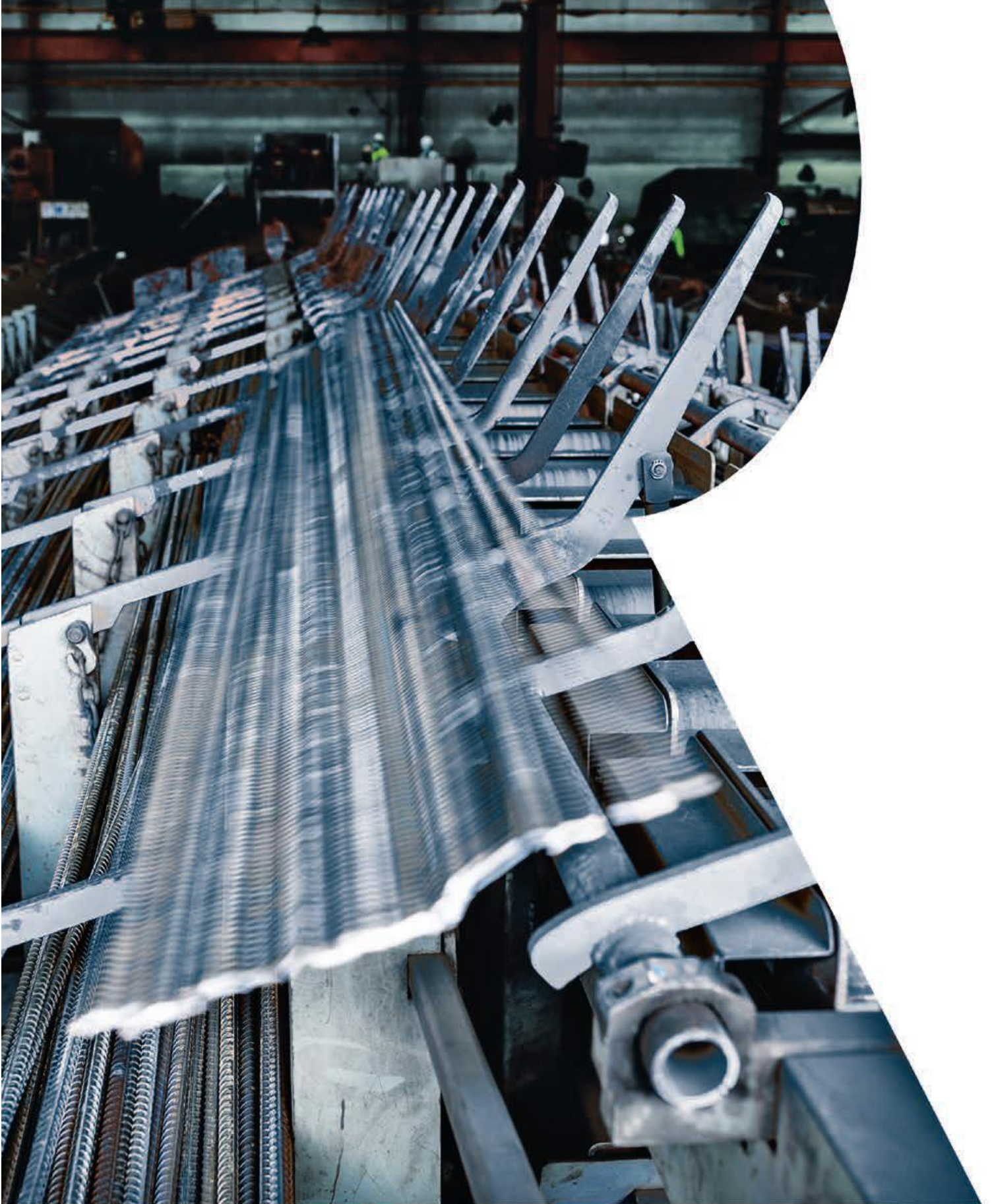
| % of Material scrap for | FY2019 | | FY2020 | | FY2021 | | FY2022 |
|-------------------------|---------|--------|---------|--------|---------|--------|--------|
| | Results | Target | Results | Target | Results | Target | Target |
| Mesh | 1.00 | < 1.35 | 1.03 | < 1.20 | 0.70 | < 1.20 | < 1.18 |
| Cut and bend | 3.20 | < 3.80 | 3.27 | < 3.60 | 3.30 | < 3.60 | < 3.55 |

GRI CONTENT INDEX

| GRI Standard | Disclosure | Disclosure Title | Page Reference and Remarks |
|-----------------------------------|--------------------|--|---|
| Organisational profile | | | |
| GRI 102: General Disclosures 2016 | 102-1 | Name of the organization | About Us |
| | 102-2 | Activities, brands, products, and services | About Us |
| | 102-3 | Location of headquarters | About Us |
| | 102-4 | Location of operations | About Us, About the Report |
| | 102-5 | Ownership and legal form | Annual Report |
| | 102-6 | Markets served | About Us, Annual Report |
| | 102-7 | Scale of the organization | Profile of the Workforce, About Us, Annual Report |
| | 102-8 | Information on employees and other workers | Profile of the Workforce |
| | 102-9 | Supply chain | Product Quality |
| | 102-10 | Significant changes to the organization and its supply chain | N.A. |
| | 102-11 | Precautionary Principle or approach | Our Environment |
| | 102-12 | External initiatives | N.A. |
| | 102-13 | Membership of associations | Singapore Metal & Machinery Association |
| Strategy | | | |
| GRI 102: General Disclosures 2016 | 102-14 | Statement from senior decision-maker | Board Statement |
| Ethics and Integrity | | | |
| GRI 102: General Disclosures 2016 | 102-16 | Values, principles, standards, and norms of behaviour | Corporate Ethics |
| Governance | | | |
| GRI 102: General Disclosures 2016 | 102-18 | Governance structure | Corporate Governance |
| Stakeholder Engagement | | | |
| GRI 102: General Disclosures 2016 | 102-40 | List of stakeholder groups | Stakeholder Engagement |
| | 102-41 | Collective bargaining agreements | Stakeholder Engagement |
| | 102-42 | Identifying and selecting stakeholders | Stakeholder Engagement |
| | 102-43 | Approach to stakeholder engagement | Stakeholder Engagement |
| | 102-44 | Key topics and concerns raised | Stakeholder Engagement |
| Reporting Practice | | | |
| GRI 102: General Disclosures 2016 | 102-45 | Entities included in the consolidated financial statements | About the Report, Annual Report |
| | 102-46 | Defining report content and topic Boundaries | Materiality Assessment |
| | 102-47 | List of material topics | Materiality Assessment |
| | 102-48 | Restatements of information | N.A. |
| | 102-49 | Changes in reporting | Product Quality |
| | 102-50 | Reporting period | About the Report |
| | 102-51 | Date of most recent report | Sustainability Report 2019, published on 25 February 2020 |
| | 102-52 | Reporting cycle | About the Report |
| | 102-53 | Contact point for questions regarding the report | About the Report |
| | 102-54 | Claims of reporting in accordance with the GRI Standards | About the Report |
| | 102-55 | GRI content index | GRI Content Index |
| 102-56 | External assurance | About the Report | |

GRI CONTENT INDEX

| GRI Standard | Disclosure | Disclosure Title | Page Reference and Remarks |
|---|------------|--|----------------------------|
| Anti-corruption | | | |
| GRI 103 : Management Approach 2016 | 103-1 | Explanation of the material topic and its Boundary | Corporate Ethics |
| | 103-2 | The management approach and its components | Corporate Ethics |
| | 103-3 | Evaluation of the management approach | Corporate Ethics |
| | 205-3 | Confirmed incidents of corruption and actions taken | Corporate Ethics |
| Materials | | | |
| GRI 103 : Management Approach 2016 | 103-1 | Explanation of the material topic and its Boundary | Material Efficiency |
| | 103-2 | The management approach and its components | Material Efficiency |
| | 103-3 | Evaluation of the management approach | Material Efficiency |
| GRI 301 : Materials 2016 | 301-1 | Materials used by weight or volume | Material Efficiency |
| Occupational Health and Safety | | | |
| GRI 103 : Management Approach 2016 | 103-1 | Explanation of the material topic and its Boundary | Health and Safety |
| | 103-2 | The management approach and its components | Health and Safety |
| | 103-3 | Evaluation of the management approach | Health and Safety |
| GRI 403 : Occupational Health and Safety 2018 | 403-1 | Occupational health and safety management system | Health and Safety |
| | 403-5 | Worker training on occupational health and safety | Health and Safety |
| | 403-6 | Promotion of worker health | Health and Safety |
| | 403-9 | Work-related injuries | Health and Safety |
| Marketing and Labelling | | | |
| GRI 103 : Management Approach 2016 | 103-1 | Explanation of the material topic and its Boundary | Product Quality |
| | 103-2 | The management approach and its components | Product Quality |
| | 103-3 | Evaluation of the management approach | Product Quality |
| | 417-2 | Incidents of non-compliance concerning product and service information and labelling | Product Quality |



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