



HEETON

SHAPING A STEADY *Future*

SUSTAINABILITY REPORT 2025



DAWA AT HILLTOP
BY HEETON



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CORPORATE PROFILE

Heeton Holdings Limited is a real estate company focused on hospitality, property development, property investment and management. Established in 1976, the Company was listed on the Singapore Exchange in September 2003 and has since extended its business frontiers beyond Singapore to the United Kingdom (“UK”), Japan, Thailand, Bhutan, China, Malaysia and Vietnam.

As a boutique property developer, Heeton enjoys a reputation for distinctive and high-quality developments in some of the world’s major cities including Singapore, London and Bangkok.

Over the years, Heeton has formed strong partnerships with other established real estate groups to develop properties locally and internationally. Heeton’s growth in the property industry is underpinned by a stable portfolio of real estate assets that include hotels and commercial properties (shopping malls and serviced offices). Heeton launched its flagship hospitality brand, *Heeton Concept Hotel* in 2017. In 2024, the Group debuted its luxury brand, *By Heeton*, further solidifying its presence in the upscale hospitality market. These brand launches reflect Heeton’s strategic growth in the sector. Heeton has 15 hotels worldwide as of December 2025.

For more details on Heeton’s profile, ownership, structure and list of properties, please view the Group’s corporate website (www.heeton.com) and Annual Reports (<https://www.heeton.com/investor-relations/annual-reports/>).

BOARD STATEMENT

The Board of Directors (the “Board”) oversees Heeton Holdings Limited (“Heeton”) and its subsidiaries (“the Group”)’s sustainability strategy and provides guidance to Management on the development of policies and management structures to implement, monitor and report on environmental, social and governance (“ESG”) performance. The Board is committed to sustainability and considers sustainability issues as part of its strategic business formulation.

This Sustainability Report (“SR2025”) highlights our achievements and targets in key areas and efforts to positively impact our stakeholders for the financial year ending 31 December 2025 (“FY2025”).

In response to evolving stakeholders’ expectations and market practices, we continue to prioritize sustainability across our international operations. Our commitment to ESG is reflected in this latest sustainability report, which aligns with international standards and articulates our initiatives aimed at reducing environmental impacts, serving the community and safeguarding good governance. We believe that these efforts will contribute to societal well-being and enhance our brand's value and appeal to discerning investors and customers.

In 2025, we opened Dawa at Hilltop by Heeton in Paro, Bhutan, a destination that supports eco-conscious tourism, reinforcing our commitment to responsible growth. Designed as a boutique and exclusive property with 87 rooms, the hotel reflects our focus on high-quality projects that minimise environmental impact while preserving local heritage and fostering social sustainability.

Looking ahead, we anticipate continued challenges in the real estate sector due to economic uncertainties, geopolitical risks and increased competition. Given the rising frequency and impacts of extreme weather events, climate change is a global and systemic risk that Heeton will continue to monitor and manage closely. Nevertheless, we are optimistic that sound ESG strategies and practices can strengthen business strategies in managing risks, enhancing organizational resilience, and inculcating a long-term and inclusive sustainable growth mindset.

We extend our gratitude to stakeholders for their unwavering support as we strive towards excellence and longevity in the real estate market. We welcome ongoing engagement and feedback for continuous improvement. Together, we will navigate the complexities of this industry and emerge stronger to benefit all stakeholders.

On behalf of the Board,

Toh Giap Eng

Executive Chairman

PERFORMANCE HIGHLIGHTS

The table below presents our FY2023-FY2025 performance on key sustainability indicators and the targets for FY2026. The FY2026 targets will serve as baseline targets for the short-term (within next 5 years), medium-term (5-10 years) and long-term (beyond 10 years) timeframes to ensure consistent monitoring of our sustainability commitments.

We have achieved most of our FY2025 sustainability targets and maintained or improved on the past year's performance. This includes maintaining a zero-incident record in the areas of governance, workplace fatality, as well as customer health and safety.

Material ESG Factors & Indicators	Performance			Targets	
	FY2023	FY2024	FY2025	FY2025	FY2026
GOVERNANCE					
Anti-corruption – Confirmed incidents of corruption	No incidents	No incidents	No incidents	Maintain zero incidents of confirmed corruption	Maintain zero incidents of confirmed corruption
Regulatory compliance – Critical non-compliance with environmental laws and regulations	No incidents	No incidents	No incidents	Maintain zero critical incidents of non-compliance	Maintain zero critical incidents of non-compliance
Supplier assessment – Percentage of contractors screened on safety requirements	100%	100%	100%	All contractors screened on safety requirements	All contractors screened on safety requirements
SOCIAL					
Talent retention – Global hire rate	48.1%	71.8%	62.2%	Reduce the global employee turnover rate	Reduce the global employee turnover rate
Talent retention – Global turnover rate	65.8%	74.0%	43.9%		
Talent retention – Average training hours per employee	6.98 hours	15.52 hours	8.73 hours	Increase the average training hours per employee	Increase the average training hours per employee
Occupational health and safety – Number of workplace fatalities	No fatalities	No fatalities	No fatalities	Maintain a safe working environment with zero workplace fatalities	Maintain a safe working environment with zero workplace fatalities

Material ESG Factors & Indicators	Performance			Targets	
	FY2023	FY2024	FY2025	FY2025	FY2026
Occupational health and safety – Number of reportable injuries ¹	5	5	0	Reduce number of reportable injuries	Minimise number of reportable injuries
Customer health and safety – Incidents of non-compliance regarding health and safety impacts of products and services	No incidents	No incidents	No incidents	Zero fatalities for all building users, and zero non-compliance with voluntary codes/laws and regulations regarding customer health and safety	Zero fatalities for all building users, and zero non-compliance with voluntary codes/laws and regulations regarding customer health and safety
ENVIRONMENTAL					
Energy – Total energy consumption (electricity and gas)	186,157 GJ	188,949 GJ	183,455 GJ	Improve on energy intensity	Improve on energy intensity
Energy – Energy intensity for Singapore investment properties	1.31 GJ /m ² floor area	1.40 GJ /m ² floor area	1.37 GJ /m ² floor area		
Emissions – Scope 1 Greenhouse Gas (“GHG”) emissions	6,467 tCO ₂ e	6,308 tCO ₂ e	6,153 tCO ₂ e	Improve on emissions intensity	Improve on emissions intensity
Emissions – Scope 2 GHG emissions	5,721 tCO ₂ e	6,329 tCO ₂ e	5,825 tCO ₂ e		
Emissions – Total Scope 1 & Scope 2 emissions	12,188 tCO ₂ e	12,637 tCO ₂ e	11,978 tCO ₂ e		
Emissions – GHG emissions intensity for Singapore investment properties	0.149 tCO ₂ e /m ² floor area	0.160 tCO ₂ e /m ² floor area	0.153 tCO ₂ e /m ² floor area		
Water – Total water consumption	180,677 m ³	185,328 m ³	172,194 m ³	Improve on water consumption intensity	Improve on water consumption intensity
Water – Water consumption intensity for Singapore investment properties	2.95 m ³ /m ² floor area	3.24 m ³ /m ² floor area	2.65 m ³ /m ² floor area		

¹ From FY2025 onwards, only reportable injuries are disclosed in this Sustainability Report, in alignment with the SGX Core ESG Metrics. Non-reportable injuries have been excluded.

ABOUT THIS REPORT

This ninth annual Sustainability Report presents Heeton’s environment, social and governance (“ESG”) policies, procedures and performance that frame our sustainability agenda for FY2025.

REPORTING SCOPE

This report covers Heeton’s financial year from 1 January 2025 to 31 December 2025. It details the management approaches to, and sustainability performance of, activities over which Heeton has direct operational control. This includes our headquarters and two investment properties in Singapore, serviced offices and nine hotels in the UK, and one hotel in Bhutan.

For social disclosures, employees of one Singapore investment property are hired separately and not included within the headquarters workforce disclosed in this and previous reports. The workforce of our UK properties comprises employees from the serviced offices and nine self-managed hotels. Employees of the new hotel in Bhutan have been included in the global workforce disclosures this year, unless otherwise stated in the report.

Property development projects² and externally managed properties and hotels³ are not included in the reporting boundaries in view of the operational control approach. Furthermore, this report does not cover the sustainability performance of our suppliers and vendors.

REPORTING BOUNDARIES

Operations and Projects
Singapore Headquarters
Investment Properties (Singapore) <ul style="list-style-type: none">• Sun Plaza• Tampines Mart
Investment and Hotel Properties (UK) <ul style="list-style-type: none">• Adam House• DoubleTree by Hilton London Kensington• Hampton by Hilton Leeds City Centre• Heeton Concept Aparthotel Queen Street Edinburgh• Heeton Concept Hotel City Centre Liverpool• Heeton Concept Hotel Kensington London• Heeton Concept Hotel Luma Hammersmith London• Stewart by Heeton Concept Aparthotel Edinburgh• Holiday Inn Express Manchester City Centre Arena• Hotel Indigo Glasgow
Hotels (Bhutan) <ul style="list-style-type: none">• Dawa at Hilltop by Heeton

² Please refer to the Property Development portfolio found in Heeton’s Annual Report 2025.

³ Externally managed investment properties and hotels would include 62 Sembawang Road (SG), Smile Hotel Sapporo Asakusa (JP), Super Hotel Sapporo Susukino (JP), Hotel Baraquadra Pattaya by Heeton (TH) and Heeton Concept Hotel Pattaya (TH).

REPORTING STANDARDS

The report has been prepared in accordance with Global Reporting Initiative (“GRI”) Universal Standards. We continue to use the GRI Standards as they are the most widely used global sustainability reporting standards due to their universal application and comprehensive guidelines. The GRI Content Index of the reported disclosures is provided at the end of this report. The report is also prepared in accordance with the Listing Rules 711A and 711B of the Singapore Exchange Securities Trading Limited (“SGX-ST”).

We have continued to follow the recommendations by the Taskforce on Climate-Related Financial Disclosures (“TCFD”) for climate-related disclosures in this report. This is an interim measure until adoption of the International Financial Reporting Standard (“IFRS”) Sustainability Disclosure Standards by FY2030. The timeline aligns with the extended implementation schedule announced by Singapore Exchange Regulation (“SGX RegCo”) in August 2025 for issuers to adopt the new IFRS standards. There is a TCFD Index at the end of this report that indicates the alignment with the eleven TCFD recommendations.

The sustainability reporting process has been subjected to internal review by our Internal Auditors, consistent with SGX’s requirements as spelt out in Practice Note 7.6 Sustainability Reporting Guide. We have not sought external assurance for this report.

We value your feedback

Should you have any comments or questions related to the contents of this sustainability report, please email us at: ir@heeton.com

STAKEHOLDER ENGAGEMENT

Our stakeholders are important to us. Recognizing the importance of alignment between the expectations of our stakeholders and our business decisions, we maintain ongoing collaboration with stakeholders through diverse engagement channels. Stakeholder engagement is an ongoing process integrated into our business operations, and we use stakeholders’ feedback to help identify the material ESG factors.

STAKEHOLDER ENGAGEMENT

Stakeholder Group	Engagement Channels
Investors	<ul style="list-style-type: none"> • Timely updates on financial results and announcements • Press releases • Analysts and relevant professionals in the property industry • Disclosures in SGXNet and www.heeton.com • Annual general meetings and extraordinary general meetings (when applicable)
Tenants	<ul style="list-style-type: none"> • Regular formal or informal tenant gatherings, meetings and feedback sessions to exchange ideas • Established channels of communication for tenant-related and property-related issues
Employees	<ul style="list-style-type: none"> • Induction programme for new employees • Training and development programmes • Career development and performance appraisal • Recreational activities
Communities	<ul style="list-style-type: none"> • Corporate Social Responsibility (“CSR”) initiatives • Corporate volunteering
Government & Regulators	<ul style="list-style-type: none"> • Regular dialogue sessions • Membership of relevant industry associations
Business Partners	<ul style="list-style-type: none"> • Regular dialogue sessions with service providers and joint venture partners

OUR MATERIAL ESG FACTORS

Heeton reviews the material ESG factors annually in view of the changing business conditions. The review takes into consideration the relevance and impacts of the selected factors to Heeton’s long-term business strategy and outcomes, as well as the attendant risks and opportunities. Furthermore, our approach is guided by the concept of double materiality, i.e. we identify and address ESG factors that are significant from two perspectives: their impact on Heeton’s value creation (i.e. financial materiality) and their influence on broader societal and environmental outcomes (i.e. impact materiality). This approach enables us to focus on issues that matter most to our stakeholders and have positive contributions to broader sustainable development.

This FY2025 Sustainability Report has retained all eleven ESG factors as identified and disclosed in last year’s report. This is because these factors continue to be relevant and significant to our stakeholders. We have added corporate social responsibility (“CSR”) as an additional ESG factor. CSR activities were previously reported in the Annual Report. For FY2025 onwards, CSR will be included in the Sustainability Report for a comprehensive overview of Heeton’s non-financial policies and initiatives. The material ESG factors have been approved by the Board and Management.

MATERIAL ESG FACTORS

Governance <ul style="list-style-type: none"> • Anti-corruption • Regulatory compliance • Supplier assessment • Data privacy and security 	Social <ul style="list-style-type: none"> • Talent retention • Occupational health and safety • Customer health and safety • Corporate social responsibility
Economic <ul style="list-style-type: none"> • Economic performance⁴ 	Environmental <ul style="list-style-type: none"> • Energy and emissions • Climate-related risks and opportunities • Water and waste

⁴ Please refer to Heeton’s Annual Report 2025 (www.heeton.com/investor-relations/annual-reports) for an assessment of the Group’s economic and financial performance.

GOVERNANCE DISCLOSURES

Heeton is committed to upholding high corporate governance standards. We believe in good corporate governance as it sustains stakeholders' trust and confidence and protects their interests. To ensure that we run our operations and grow our business with integrity, we have implemented robust governance policies and procedures to ensure compliance and transparency in our business conduct.

The Board oversees the corporate governance structure and sustainability strategy of the Group and provides guidance to Management on the development of policies and management structures to implement, monitor and report on ESG performance. The Board receives periodic updates on sustainability-related issues from the business units while ad hoc or urgent issues of critical concern are surfaced to the Board expeditiously for decision making and remediation of negative impacts if necessary.

The corporate-wide Sustainability Committee, chaired by the Chief Executive Officer ("CEO"), comprises functional heads who formulate, implement and track Heeton's sustainability policies.

Our employees are expected to conduct themselves with honesty and integrity at work. Heeton's code of conduct is included in the Group's Employee Handbook, together with regulations and guidelines on governance matters such as discipline, confidentiality and intellectual property.

RISK MANAGEMENT

The Board has ultimate responsibility for Heeton's sustainability strategy and reporting, including climate-related risks and opportunities. The Board has established a separate risk management committee ("Risk Management Committee") comprising of the Chairman, CEO and Chief Financial Officer to assist in overseeing the Group's risk management framework and policies. The Risk Management Committee regularly reviews the Group's business and operations to identify areas of significant business risks, puts in place appropriate measures to address these risks, and reports to the Board on areas of significant risks to the Group's operations, if any.

The Group has been identifying and reporting the climate-related risks and disclosing our Scope 1 and Scope 2 Greenhouse Gas ("GHG") emissions since FY2022. In view of climate change's growing physical and transitional impacts globally, the Risk Management Committee has incorporated salient climate-related risks in the overall risk universe for ongoing prioritisation, monitoring and management.

PREVENTING CORRUPTION

Heeton maintains a zero-tolerance position against all forms of corruption, including bribery and fraud. We are committed to upholding a high level of business ethics and integrity which extends to working with our suppliers and business partners. We believe that the prevention of corruption across our value chain is vital to safeguarding the interests of our stakeholders and Heeton's reputation.

All employees are required to adhere to our corporate policies on anti-corruption, anti-money laundering, whistleblowing and blackout periods. All new hires are required to go through a mandatory induction programme where they are formally introduced to these policies as well as our code of conduct and procedures. In FY2025, there were no confirmed cases of corruption at our Singapore and UK operations.

Our whistleblowing policy aims to encourage responsible and secure reporting of any incident of violation or suspected violation of our code of conduct, such as unethical or illegal practices. Should such an incident occur, it should be reported to either the supervisor, or where impractical, to the next highest or another level of management, a member of the Board of Directors, or to the Receiving Officer.

A receiving officer, appointed by the Audit Committee, will be responsible for the processing of whistleblowing complaints (“Receiving Officer”). The Receiving Officer will report to the Audit Committee, who will decide how the case should be progressed and resolved – whether there is merit for taking the case further, including embarking on civil and/or criminal proceedings in addition to appropriate disciplinary actions.

The Receiving Officer can be reached at receivingofficer@heeton.com (email) or +65 6456 1188 (phone).

REGULATORY COMPLIANCE

Heeton maintains a strong adherence to corporate governance practices and the applicable laws and regulations across different jurisdictions. We recognize that full compliance with all the applicable regulations across jurisdictions builds a strong foundation of trust with our stakeholders.

We regularly review our regulatory risks by keeping abreast of developments in relevant laws and regulations to ensure timely updating and implementation of compliance measures across the business operations. We also ensure that our suppliers and partners abide by all relevant regulations.

In FY2025, there were no confirmed incidents of non-compliance with laws and regulations in the environmental, social and economic areas that could result in significant fines or sanctions.

SUPPLIER ASSESSMENT

Heeton promotes the integration of sustainability practices and procedures across our business value chain. The nature of our real estate business often requires the appointment of third-party service providers or collaboration with joint venture partners. We recognize the importance of maintaining transparency and adopting high standards of business ethics and integrity when working with the external parties.

In Singapore, most of our suppliers are locally based and include utility providers and vendors for office supplies, information technology, travel, maintenance and other services. Our two managed investment properties in Singapore engage external providers for cleaning, security, pest control and other maintenance services. Our nine managed hotels in the UK rely on hundreds of small-to-large suppliers, including food, beverage and professional service

providers.

We ensure that suppliers' personnel are covered by our internal policies and requirements, such as worker safety and security, when they are working at our premises.

We prioritize appointing suppliers and contractors who engage in sustainable practices, including but not limited to, ensuring safe working conditions, respecting workers and human rights, and observing sustainable development policies and practices. We also monitor our suppliers and business partners for anti-money laundering or other unethical practices.

All Heeton's suppliers are encouraged to adhere to best practices and industry standards, such as obtaining the Building and Construction Authority ("BCA")'s certifications in Singapore. In FY2025, 100% of contractors were screened on safety requirements.

DATA PRIVACY AND SECURITY

Heeton recognizes the importance of data privacy and cybersecurity in maintaining trust with our stakeholders and safeguarding the integrity of our operations. We have established policies and practices to ensure compliance with relevant data protection laws, including the Personal Data Protection Act ("PDPA") in Singapore and the UK General Data Protection Regulation ("UK GDPR").

A dedicated data protection officer oversees compliance with privacy regulations and drives the continuous improvement of our data management practices. Ongoing training programmes ensure that employees understand their roles in maintaining data security and adhering to privacy standards.

We are committed to transparency in how we collect, use, and store data, providing stakeholders with clear information about their data rights and obligations. Our privacy practices prioritize minimizing data collection and retention to reduce exposure to data governance risks.

Heeton employs cybersecurity technologies – including encryption, firewalls, and intrusion detection systems – to protect data against unauthorized access, breaches and other cyber threats. Regular system audits and penetration testing are conducted to identify vulnerabilities and strengthen our cyber-defences. In FY2025, there were no reported cases of cybersecurity breaches.

SOCIAL DISCLOSURES

Our people are our most valuable asset. Heeton places utmost importance in attracting, recruiting and retaining skilled employees with diverse and relevant expertise and experience. Our ability to attract and retain talented people to deliver our projects and services is critical to business success.

Heeton Holdings Limited and our subsidiary Heeton Management Pte Ltd are members of the Singapore National Employers Federation (“SNEF”), reflecting our commitment to progressive employment practices and alignment with Singapore’s tripartite standards.

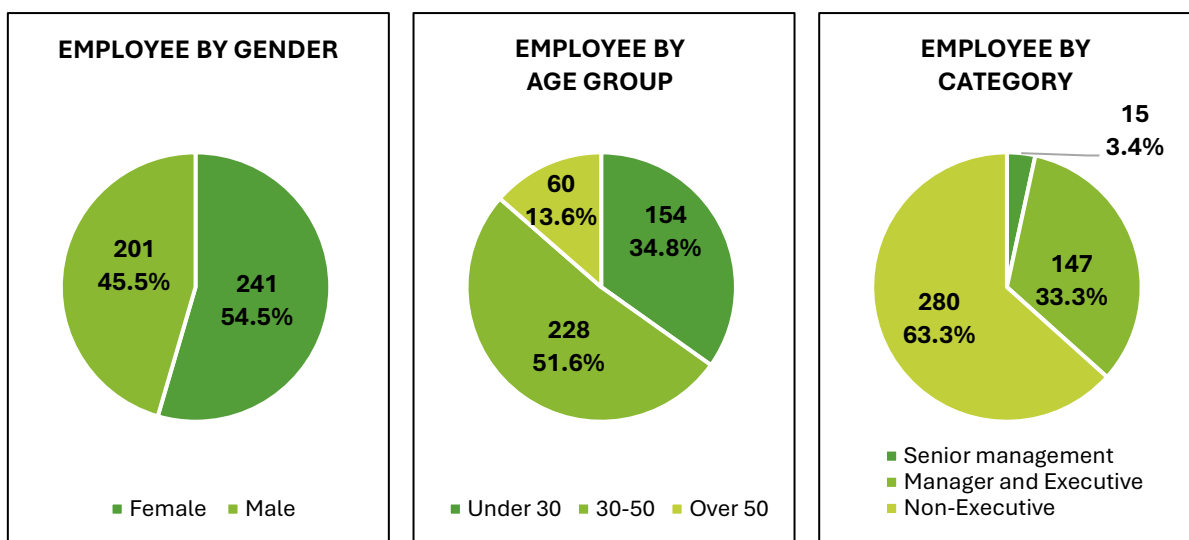
ENSURING FAIR EMPLOYMENT AND DIVERSIFYING OUR WORKFORCE

Heeton’s human resource (“HR”) policies are grounded in equal opportunities and fair employment practices. Our recruitment process considers all qualified candidates without prejudice to gender, age, ethnicity, religion and national origin. Employees participate in regular performance reviews and are promoted based on merit and performance. We value the expertise of older employees and continue to employ individuals beyond the prescribed national retirement ages.

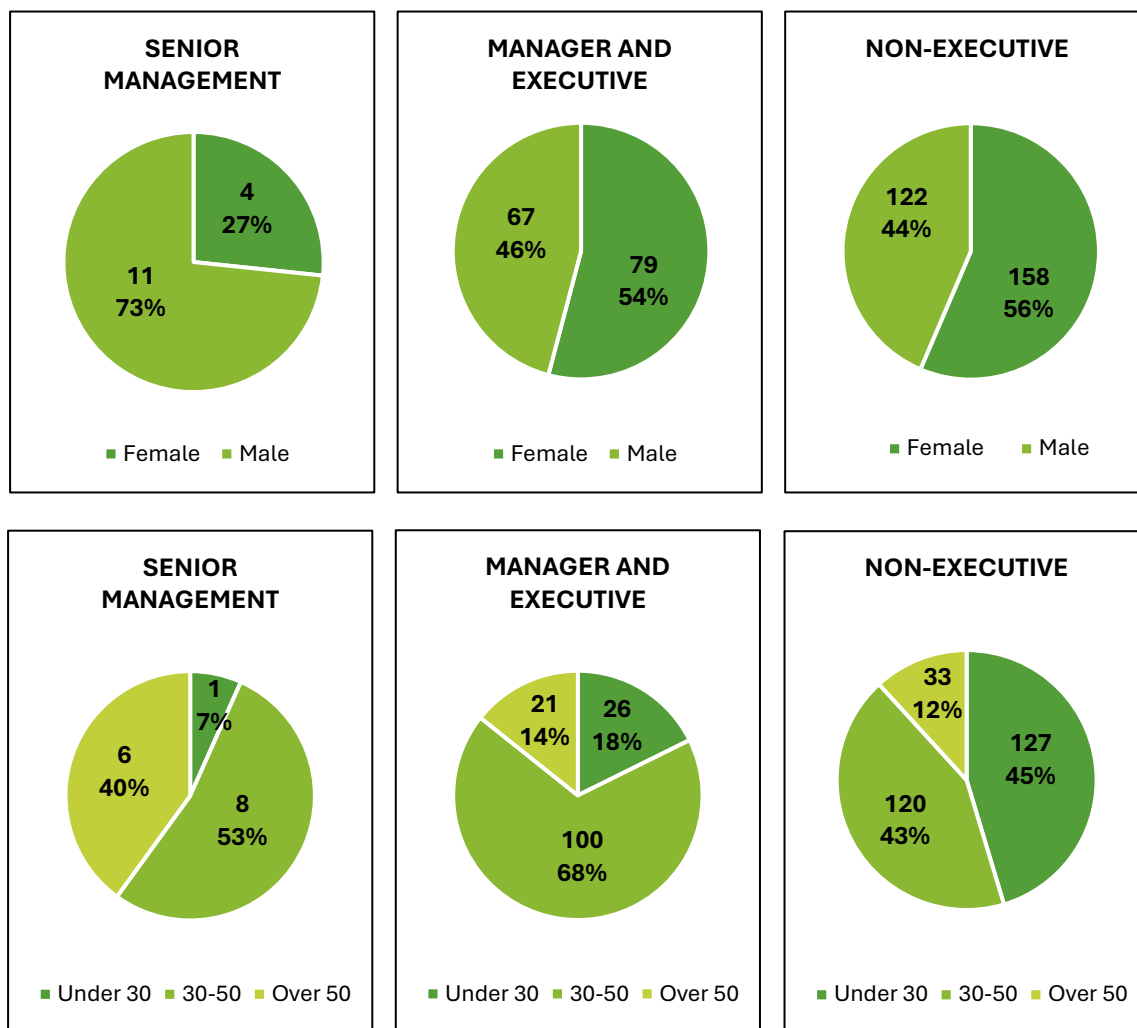
The Group’s global workforce (inclusive of full-time and part-time employees) grew by 36.8% from 323 employees in FY2024 to 442 employees as at 31 December 2025, comprising 36 employees at our Singapore headquarters, 326 employees at our UK properties, and 80 employees at our newly opened hotel in Bhutan.

Women comprised 54.5% (241 employees) of the global workforce, accounting for 55.6% (20 employees) of the headcount in the Singapore headquarters, 57.1% (186 employees) in the UK properties and 43.8% (35 employees) in Bhutan respectively. 158 female employees were employed as non-executives at the Group level (56.4% of the total non-executives), in line with the overall profile of the workforce.

The Group had a diverse workforce in terms of age distribution with 34.8% (154 employees) under 30 years of age, 51.6% (228 employees) aged between 30 and 50, and 13.6% (60 employees) above 50 years of age.



Of our 442 employees, 15 (3.4% of total workforce) held senior management positions, 147 (33.3%) held managerial or executive roles, and 280 (63.3%) were non-executives. The proportion of non-executive staff remained higher at the UK and Bhutan properties (68.1% and 67.5% respectively) compared to that in the Singapore headquarters (11.1%), reflecting the operational nature of the Group's hospitality workforce at these locations. The detailed breakdown of employee categories by gender and age group are provided below.



As of 31 December 2025, part-timers represented 36.7% (162 employees) of the Group's global workforce (442 employees), comprising 159 permanent part-time and 1 temporary part-time staff at the UK properties, and 2 permanent part-time staff at the Singapore headquarters.

VALUING AND RETAINING OUR EMPLOYEES

Heeton rewards our employees with competitive salaries that align with market standards, recognize employees' contribution to the success of the company, and retain our skilled workforce. Compensation for individual employees is determined by their position, competence and performance. The process to determine salary packages for non-management employees is approved by HR and the Head of Department. Given that market wage levels vary across seniority and job scope, we do not track the annual total compensation ratio between the

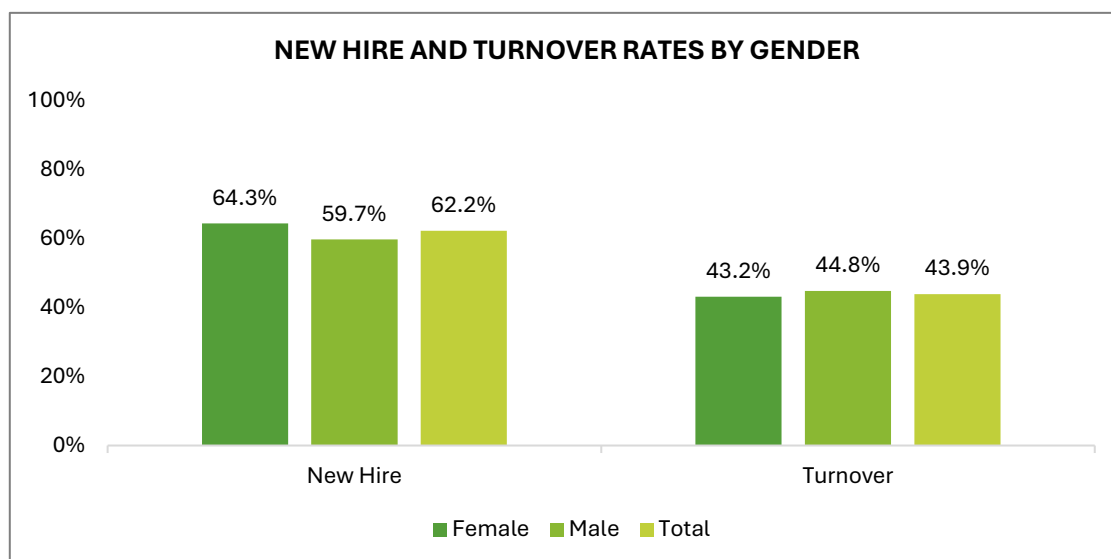
organisation’s senior management and the median compensation for all employees.

Employees are entitled to a variety of benefits, such as medical care, paid parental leave, annual leave and birthday leave. They can also opt for flexible work arrangements. Our Employee Handbook provides guidelines about our policies, procedures and practices, terms and conditions, as well as details on the compensation schemes and benefits.

In the UK, employees also receive a paid Volunteering Day since FY2024. Additionally, our UK office partnered the Society for the Promotion of Attention-Deficit Hyperactivity Disorder Research & Knowledge (“Spark”), a non-profit supporting families with Attention-Deficit Hyperactivity Disorder Research & Knowledge (“ADHD”) children, by offering job placements to students with special needs. The Employee Assistance Programme (“EAP”), launched in FY2024, offers employees confidential support and advice on both personal and work-related issues. This strengthens holistic support for employees’ health and well-being.

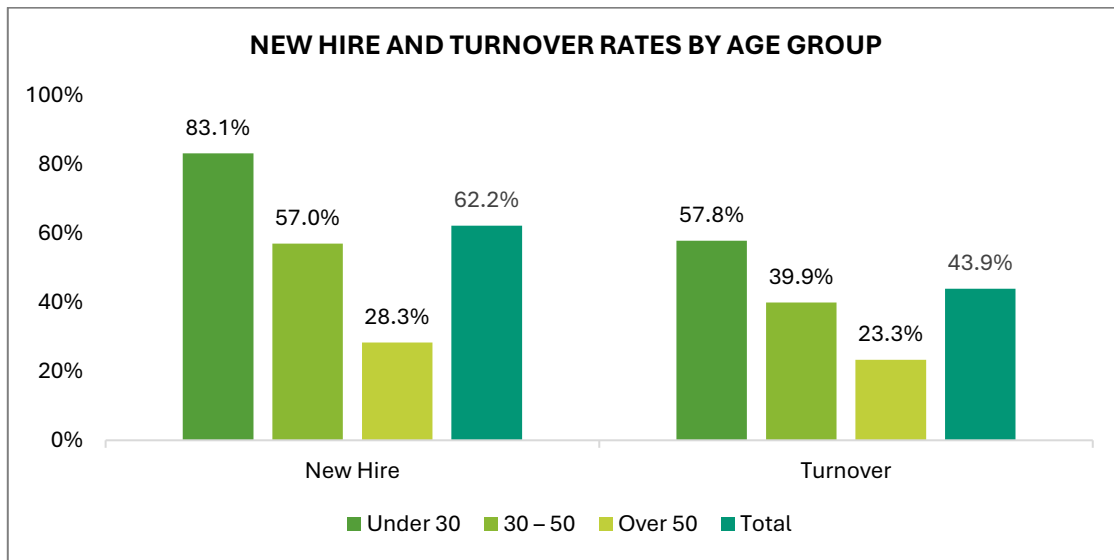
In FY2025, the Group hire rate⁵ was 62.2%, with a total of 275 new employees hired during the year, as compared to the hire rate of 71.8% and new hires of 232 in FY2024. The hire rates by gender were 64.3% (155 new employees) for female employees and 59.7% (120 new employees) for male employees.

The overall turnover rate⁶ for the Group in FY2025 was 43.9% (194 employee departures), which was lower than the 74.0% (239 employee departures) in FY2024. The turnover was lower for female employees at 43.2% (104 departures) compared to male employees at 44.8% (90 departures). In the UK, turnover declined from 80.6% to 58.9%. While high, this remains typical for the hotel industry due to the sector’s inherent seasonality and reliance on part-time and transient labour. There was no employee turnover in the newly opened Bhutan property.



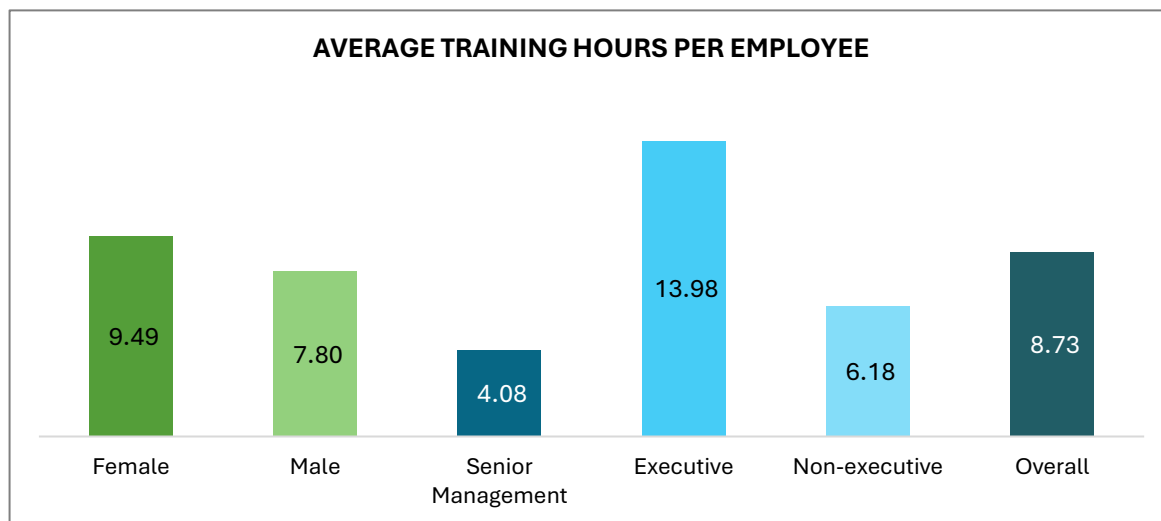
⁵ Hire rates are based on year-end headcount.

⁶ Turnover rates are based on year-end headcount.



ENHANCING THE SKILLS OF OUR EMPLOYEES

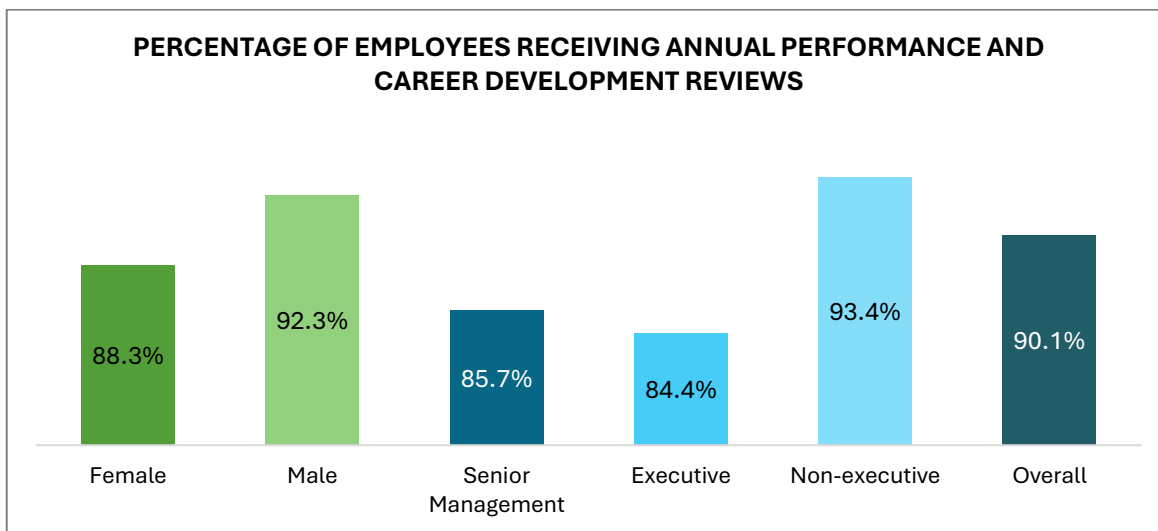
At the Group level, the average training hours per employee was 8.73 hours in FY2025, lower than 15.52 hours in FY2024. The decrease was primarily due to a transition within the Human Resources department in the UK and we expect training activities to resume in FY2026. In the UK, we ensured that our Sponsorship License continued to be valid and tapped on the Apprenticeship Levy for apprenticeship training. We continued to provide work placement opportunities to secondary school students.



Across the business units, HR continued to track and monitor employee training and review training needs. We involve our employees in continually identifying appropriate training aligned to their learning requirements and skills development.

We conduct annual performance reviews with our employees centred on their performance and career goals to support individual career pathways and professional growth. In FY2025, 90.1% of the employees⁷ received feedback on their performance and recommendations for improvement from their supervisors, compared with 88.9% in FY2024.

⁷ Employees at the Dawa at Hilltop by Heeton were excluded from the FY2025 performance feedback percentage rate, as the property was newly opened and no formal review cycle had been completed by year-end.



OUR SAFETY PRACTICES

Workplace safety is a critical component when conducting our business. In FY2025, there were zero workplace fatalities and no incidents of non-compliance with regulations or voluntary codes regarding health and safety impacts of managed properties. Heaton maintained strict compliance with local laws and regulations regarding work and business activities.

Standard safety procedures and contingency plans have been established at all our properties and hotels. This includes internal and external audits, fire safety practices and regular fire safety audits and drills led by our property managers. Equipment is inspected and upgraded whenever necessary to ensure that they are in sound working condition. The property managers ensure timely renewal of operating permits and licenses for fire safety installations, lifts, escalators and areas of high safety risks. Personal Emergency Evacuation Plans (“PEEPs”) are in place at our UK properties to assist individuals who require additional support during a general emergency evacuation, such as persons with disabilities.

We regularly assess our safety practices to identify potential hazards within our operations. Risk assessment is reviewed and updated to follow preventive and corrective action plans. This includes procedures for contractor attendance log and hot work permits onsite. We completed our hand vibration assessments for all maintenance team members. We also organized group-wide safety meetings monthly to share best practices and provided training and guidance.

An open channel of communication across the Group is available to gather feedback on issues relating to health and safety. Regular safety education and training, including the induction programme for new employees, continue to be provided for our employees as well as suppliers and visitors where relevant.

Heaton places a stronger emphasis on employee mental health. In the UK, we have been running the Mental Health Awareness Training for senior managers since FY2024. By completing the training, managers and employees can spot the signs and symptoms of mental health issues and provide mental health support to their colleagues. At the Singapore headquarters (“HQ”), Heaton marked World Mental Health Day on 10 October by organising Wellness Day initiatives focused on building positive workplace relationships and distributing a small token of appreciation to all HQ employees as a gesture of care and support.

Heaton has assessed the health and safety impacts of our properties and services, and remains committed to promoting workplace safety and customer health and safety, ensuring compliance

with local laws and regulatory requirements as well as maintaining zero fatalities among employees and all building users.

CORPORATE SOCIAL RESPONSIBILITY

Heeton's Corporate Social Responsibility ("CSR") initiatives reflect our commitment to giving back to society, supporting vulnerable communities, promoting environmental stewardship and fostering meaningful partnerships at the local level. In FY2025, our teams across Bhutan, Singapore and Thailand carried out a range of CSR activities that embodied these values, deepened employee engagement and reaffirmed Heeton's commitment to positive social impact.

Education and Youth



TONGSA PENLOP INSPIRE PROGRAM (BHUTAN)

In collaboration with Druk Air, Dawa at Hilltop by Heeton hosted the farewell dinner for the Tongsa Penlop Inspire Program — a Bhutanese educational outreach initiative that sponsors enriching excursions for academically talented students from underprivileged and remote schools. We welcomed 90 guests, including the Queen's Father. Many of the participating students experienced a hotel setting for the very first time, leaving with confidence, inspiration and warm memories of generous hospitality.

CHILDREN'S DAY BICYCLE DONATION (THAILAND)

Heeton Concept Hotel Pattaya and Hotel Baraquda Pattaya by Heeton donated bicycles to Pattaya City Hall in support of the National Children's Day celebration — bringing happiness, mobility and inspiration to children in the community on this special occasion.



Health and Well-Being



RACE INSPIRED! 2025 — BUDDY UP FOR KIDNEY HEALTH (SINGAPORE)

In partnership with the National Kidney Foundation (“NKF”) Singapore, Heeton's Singapore office organised a health-themed community event at Waterway Point. Employee volunteers and their families enjoyed an afternoon of wellness carnival booths, interactive games and a walkathon — a collective act of solidarity with kidney patients that reinforced collective commitment to healthier lifestyles.

QUARTERLY BLOOD DONATION DRIVE (THAILAND)

In partnership with the Thai Red Cross Society, Chonburi, our Pattaya hotels organised blood donation activities every quarter. This sustained commitment reflects the team's dedication to giving the gift of life, and to supporting the health and well-being of fellow community members in a meaningful way.



Environment And Conservation



TURTLE CONSERVATION PROGRAM (THAILAND)

In conjunction with World Turtle Day on 23 May 2025, our team collaborated with the Sea Turtle Conservation Center of the Royal Thai Navy to conduct a Marine Education Programme and Turtle Pond Cleaning Activity. The initiative raised awareness of marine biodiversity and the critical importance of protecting sea turtle populations for future generations.

GIVING LIFE BACK TO THE SEA (THAILAND)

Executives and colleagues from both Pattaya hotels joined hands at the Ban Nai Community Blue Swimming Crab Bank in Si Racha, Chonburi, to support sustainable coastal resource conservation. Blue crabs were released as part of the provincial Crab Bank programme — expanding community resources and restoring aquatic life along the Thai coastline.



Disaster Relief and Community Aid



FLOOD RELIEF DONATION TO HAT YAI (THAILAND)

On 1 December 2025, representatives from the management and staff of our Pattaya properties came together to extend support to flood-affected communities in Hat Yai and the lower southern provinces of Thailand. Working in partnership with Pattaya City and the Sawangboriboon Thammasathan Foundation, the team donated dried food, beverages, medical supplies and essential items to affected residents.

ENVIRONMENTAL DISCLOSURES

Responsible resource management supports our environmental commitments while enhancing long-term business resilience. We continuously seek opportunities to lower energy and water usage, while enhancing operational efficiency across our properties and hotels.

Monthly reports on energy and water consumption at our investment properties are submitted to the management and reviewed to identify any irregularities and undertake the appropriate actions. At our hotels, tracking of energy and water consumption is done via an online tool to ensure the efficiency of implemented resource conservation measures.

We promote environmental awareness among our employees and tenants by sharing best practices via emails to help reduce the environmental footprint at work.

CLIMATE-RELATED RISKS AND OPPORTUNITIES

Heeton has been identifying and reporting climate-related risks relevant to our business since FY2022. Climate change exposes physical properties and other facets of our operations to physical risks and transition risks. Physical risks include physical damage from extreme weather events (e.g. water damage from floods and infrastructural damage from storms), business disruption due to facility shut down, and costs/provisions for repairs. Transition risks are business-related risks that follow societal and economic shifts toward a low-carbon future. These risks can include policy and regulatory risks, rising compliance and insurance costs, obsolete infrastructure, technological risks, market risks and reputational risks.

A key finding in the United Nations Environment Programme (“UNEP”)’s annual Emission Gap Report released in November 2025 was that global emissions continued to surge, reaching an all-time highest of 57.7 GtCO₂e in 2024. The report projected that in the best-case scenario whereby all countries fulfill their conditional Nationally Determined Contributions (“NDCs”) and net-zero pledges, there would be a 66% chance of limiting global warming to between 1.8°C and 2.3°C by 2100. However, if countries were to continue with current policies, there would be a 66% chance of global warming reaching between 2.1°C and 3.9°C by 2100. We have adjusted our global warming scenarios for planning purposes in view of the UNEP’s assessment:

- An **optimistic scenario** whereby the world would limit global warming to below 2°C in 2100 in line with the Paris Agreement. While the impacts of climate change would be relatively less adverse compared to the pessimistic scenario, extreme weather events are expected to be more frequent and severe as compared to current trends. Heeton will need to proactively invest in climate resilience measures and sustainable practices to benefit from enhanced operational efficiency and reduce exposure to regulatory and reputational risks. This scenario assumes the implementation of additional carbon mitigation regulations, a societal shift toward renewable energy and increased market demand for sustainable products and services.
- A **pessimistic scenario** whereby global warming could exceed 3°C by 2100. Companies would face escalating physical risks from climate change, including damage to infrastructure, disruption of supply chains and loss of assets. This scenario assumes that global mitigation efforts fall short with geopolitical tensions in place. Climate policies exist in a fragmented manner and are significantly less proactive as compared to the Paris-aligned scenario. The physical impacts of climate change worsen; transition risks are moderate and companies will

need to prioritise climate adaptation over emission mitigation.

The updated analysis of climate-related risks and opportunities is presented in the table below, using short-term (within next 5 years), medium-term (next 5–10 years) and long-term (beyond 10 years) timeframes.

Description	Timeframe	Impact	Response Measures
Physical Risks			
Catastrophic extreme weather events – Such as heat spells, heavy rain and flash floods	Short-term	<ul style="list-style-type: none"> • Adverse impacts are often unpredictable and location-specific • Costs to repair or replace damaged or destroyed assets, value impairment • Property downtime and business disruption • Potential for increased insurance costs or reduced/no insurance availability 	Heeton will have to consider such climate-related risks when planning new projects and acquisitions. This includes undertaking location and asset-specific impact assessments under the two global warming scenarios if necessary
Gradual changes in weather patterns – Such as higher temperatures, rising sea levels, increasing frequency of heavy rain and wind, and erratic rainfall	Medium to long-term	<ul style="list-style-type: none"> • Increased wear and tear or damage to buildings, leading to increasing maintenance costs • Increased operating costs due to need for additional or alternative resources (e.g. energy and water) to operate a building, i.e. some of the risks and impacts can be indirect • Cost of investment in adaptation measures, such as elevating buildings or incorporating additional cooling methods • Potential for increased damages from catastrophic events • Potential for increased insurance costs or reduced insurance availability 	Heeton will comply with the latest regulatory requirements and adopt best practices in ensuring that our assets are resilient against gradual changes in weather patterns. We have to be prepared for higher costs of adaptation measures if the pessimistic climate change scenario pans out. We also need to prioritize climate-resilient infrastructure and equipment.

Description	Timeframe	Impact	Response Measures
Transition Risks			
Market risks – The possibility that markets and industries vulnerable to climate change will become less attractive to investors over time. This can lead to rising capital costs for building and maintaining infrastructure to manage climate risks	Medium to long-term	<ul style="list-style-type: none"> • Reduced economic activity in vulnerable markets • Reduced demand for properties • Reduced asset value 	Heaton will communicate steps taken to identify and manage climate-related risks to investors and other stakeholders. We have to double down on such efforts should climate change follow the optimistic scenario pathway whereby transition risks are more salient
Policy and regulation risks – E.g. climate risk disclosure, tougher building standards, carbon pricing and emissions caps	Medium to long-term	<ul style="list-style-type: none"> • Increased cost of doing business due to new disclosure requirements and compliance measures • Increased costs, e.g. from carbon pricing of emissions from existing buildings, and new reporting and mitigation requirements for GHG emissions. Additional capital investment may be required to comply with stricter regulations 	Heaton is continually monitoring changes in government climate-related policies and regulations. We will ensure strict compliance with relevant regulatory requirements in the jurisdictions where we operate. We can expect increased regulatory oversight in line with governments’ national decarbonization strategies, especially as the impacts of climate change intensify over time
Resource risks – Changes in the availability, pricing and supply volatility of key resources such as construction materials, energy and water	Short-term	<ul style="list-style-type: none"> • Increased costs and reduced net operating income due to volatile and higher prices for water and energy • Additional capital expenditures to adapt buildings to operate with reduced/ alternative resources 	Heaton will enhance our supply chain resilience by diversifying our pool of partners and suppliers. We can also explore the use of greener alternatives

Description	Timeframe	Impact	Response Measures
<p>Reputational risks – Growing stakeholder preference to work with companies incorporating climate risk into investment decisions and operations, as well as consumer preference for products and services from green real estate companies</p>	<p>Medium to long-term</p>	<ul style="list-style-type: none"> • Risk to brand and market perception if the company is not on par with industry peers in managing climate risks • Lower liquidity and/or reduced attractiveness of assets that have not incorporated climate mitigation • Damage to reputation and market position if green claims are not substantiated 	<p>Heaton will continue efforts to develop and implement sound sustainability strategies, adopt good governance practices, and engage external stakeholders clearly and transparently.</p>
<p>Climate-related Opportunities</p>			
<p>Resource efficiency – With innovation and improvements in technology, there are increasingly more resource efficient products and services available in the market. Switching to such options can reduce costs and environmental impacts</p>	<p>Short to medium-term</p>	<ul style="list-style-type: none"> • More water-efficient systems using recycled water and rainwater can be explored for cooling systems • Circular business models and practices can reduce waste and resource usage • Green building materials and construction techniques can reduce embodied carbon and across infrastructural assets' life cycle 	<p>Heaton will look out for such innovations and opportunities, and adopt a balanced approach by considering environmental benefits, safety, cost and operational efficiency</p>
<p>Transition to renewable and clean energy – Costs of clean energy (notably solar and wind) are declining, which will accelerate the transition away from fossil fuels</p>	<p>Short to medium-term</p>	<ul style="list-style-type: none"> • Electrification and switching to renewable energy reduce emissions and enhance resilience by diversifying energy sources • Purchasing green energy can be more cost effective than relying on fossil fuels 	<p>Heaton will explore adoption of renewable energy subject to availability, pricing and operational requirements</p>

Description	Timeframe	Impact	Response Measures
<p>Growing demand for green buildings and spaces – Tenants, tourists and consumers become more conscious of and opting for greener infrastructure, accommodation and services</p>	Short to medium-term	<ul style="list-style-type: none"> • Low emission and resilient buildings will grow in demand, especially if climate change intensifies in the coming years • Hotels that are sustainable in their operations will generate savings and attract more customers 	Heeton will take a proactive approach in ensuring our current and new developments are sustainable to meet and exceed customers' expectations
<p>Increasing availability of green financing – Financial institutions are offering various types of financing tied to adoption of green technologies and good ESG performance</p>	Short to medium-term	<ul style="list-style-type: none"> • Reduced cost of capital, e.g. green loans with preferential interest rates • Securing green financing can potentially enhance market perception and corporate branding 	Heeton will explore green financing schemes that are aligned with our business focus and investments

METRICS FOR CLIMATE-RELATED ASSESSMENT

In line with SGX's Sustainability Reporting Guide, we have been referencing the TCFD recommendations in reporting our climate-related disclosures around the four areas of governance, strategies, risk management, and metrics and targets. This is an interim measure until the adoption of the International Financial Reporting Standard ("IFRS") Sustainability Disclosure Standards issued by the International Sustainability Standards Board ("ISSB") by FY2030. This timeline aligns with the extended implementation schedule announced by SGX RegCo in August 2025 for all issuers to adopt the new IFRS standards.

For disclosures on emissions, we follow the guidelines of the Greenhouse Gas ("GHG") Protocol and reference the environmental metrics in SGX's recommended Core ESG Metrics. Furthermore, we tap on authoritative and relevant resources, such as the UK Green Building Council ("UKGBC")'s *Guide to Scope 3 Reporting in Commercial Real Estate* publication.

We are using Scope 1 GHG emissions, Scope 2 GHG emissions and GHG emissions intensity as the primary metrics to assess climate-related risks and opportunities. This is because an increase in emissions would expose the Group to higher levels of climate-related risks as articulated in the preceding section of the report. Scope 1 and Scope 2 GHG emissions are in turn contributed using fossil fuels and purchased electricity. The annual target is to improve on emissions intensity. Our long-term goal is to switch to greener fuels and renewable energy, taking into consideration availability, cost effectiveness, government regulations, market norms and operational needs.

SGX RegCo's announcement in August 2025 stated that Scope 3 GHG emissions reporting will

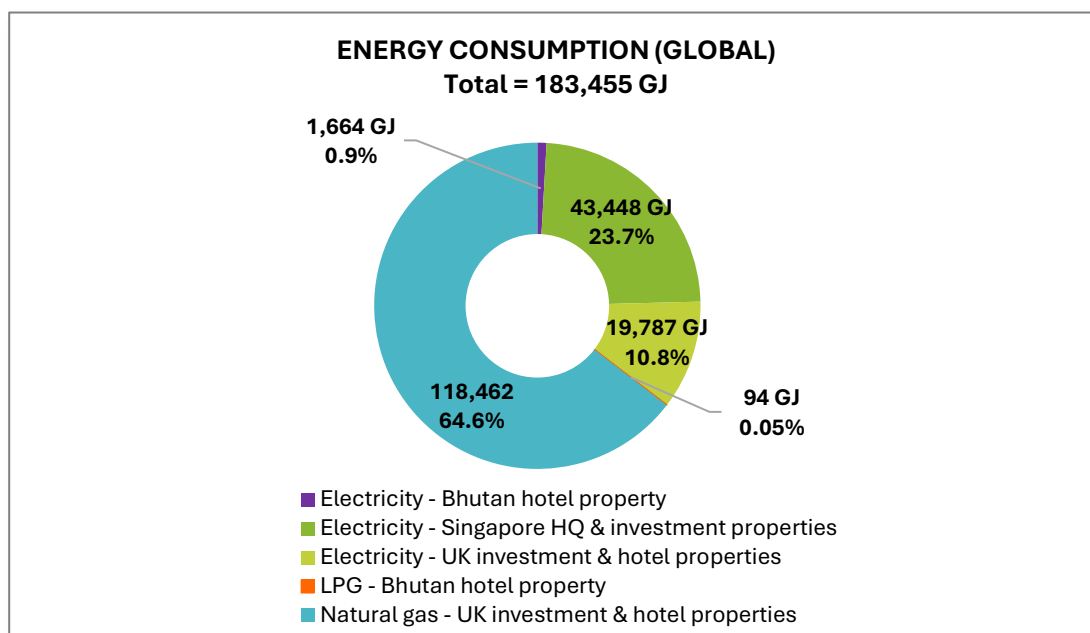
remain mandatory for Straits Times Index (“STI”) constituent listed companies from FY2026. For other non-STI constituent listed companies such as Heeton, Scope 3 GHG emissions reporting will be voluntary until further notice. As such, Heeton will monitor the feasibility in measuring and disclosing Scope 3 GHG emissions in future sustainability reports, bearing in mind SGX RegCo’s latest rules, evolving reporting standards, stakeholders’ needs and market practices.

ENERGY AND EMISSIONS⁸

In FY2025, our total energy consumption was 183,455 GJ, with 23.7% from operations in Singapore, 75.4% from the UK properties and 0.9% from our new hotel in Bhutan. This represents a 2.9% reduction from the 188,949 GJ in FY2024. The energy intensity for Singapore managed investment properties was 1.37 GJ/m² floor area in FY2025, 2.0% lower than the 1.40 GJ/m² floor area in FY2024. The energy intensity for the UK properties was 3.03 GJ/m² floor area in FY2025, 6.1% lower than the 3.23 GJ/m² floor area in FY2024. Energy intensity at the Bhutan hotel was 0.09 GJ/m² in FY2025.

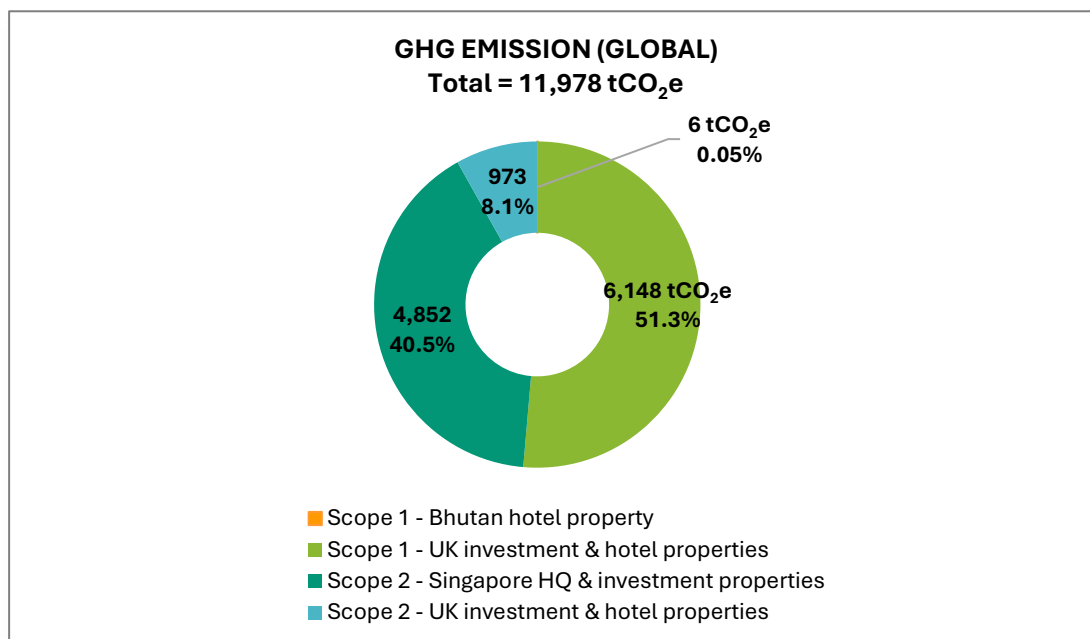
Natural gas consumption by the UK properties and Liquefied Petroleum Gas (“LPG”) consumption at the Bhutan hotel accounted for 64.6% of total energy consumed while purchased electricity by Singapore, UK and Bhutan properties accounted for the remaining 35.4%.

The two managed investment properties in Singapore were collectively the largest electricity consumer at 43,300 GJ (12.0 million kWh). This was 2.1% lower than the FY2024’s electricity usage of 44,222 GJ (12.3 million kWh). Our UK properties consumed 19,787 GJ (5.5 million kWh) of electricity. This was 9.1% lower compared to 21,764 GJ (6 million kWh) of electricity used in FY2024. The reduction in electricity consumption is mainly attributed to air conditioning system and Air Handling Units (“AHU”) upgrades at our UK properties.



⁸ Emissions figures are computed using the latest Singapore’s grid emission factors published by Singapore’s Energy Market Authority (“EMA”) and conversion factors from the UK Government’s Department for Energy Security and Net Zero.

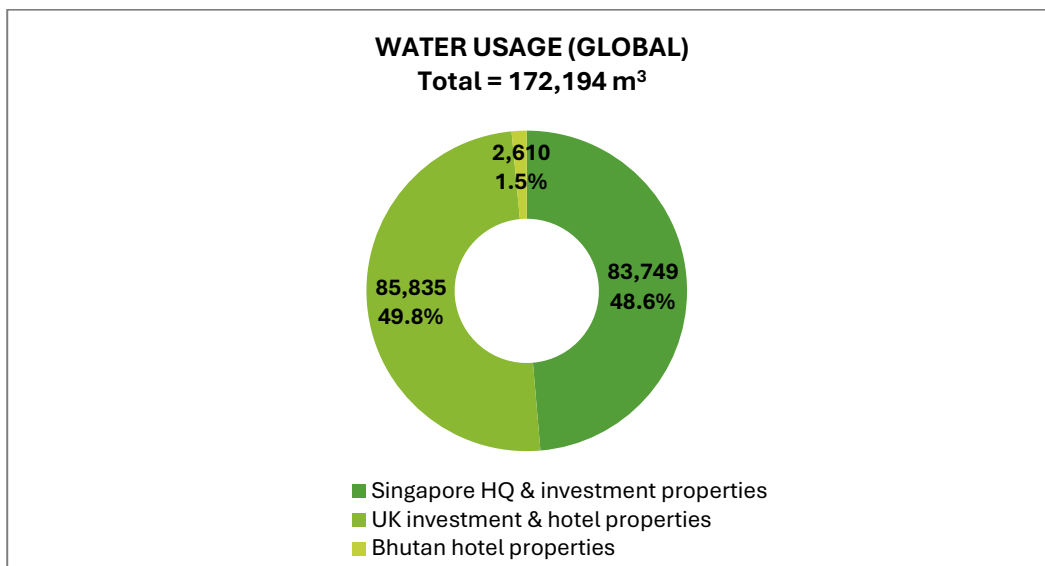
Our total greenhouse gas (“GHG”) emissions amounted to 11,978 tCO₂e (tonnes of CO₂ equivalent) in FY2025, 5.2% lower than the 12,637 tCO₂e in FY2024. The FY2025 emissions comprised 6,153 tCO₂e of direct Scope 1 emissions (51.4%) generated from natural gas consumption by the UK properties and LPG usage at the Bhutan hotel, and 5,825 tCO₂e indirect Scope 2 emissions (48.6%) from purchased electricity used in our Singapore, UK and Bhutan operations. Our Scope 2 emissions are location-based as we do not purchase renewable energy separately. Scope 1 emissions decreased 2.5% compared to 6,308 tCO₂e in FY2024 and Scope 2 emissions decreased 8.0% compared to 6,329 tCO₂e in FY2024.



The emissions intensity for the Group declined by 24.4% to 0.124 tCO₂e/m² in FY2025, compared to 0.164 tCO₂e/m² in FY2024. The inclusion of our newly opened Bhutan hotel contributed positively to the Group's overall emissions in view of the country's emission-free electricity. The emissions intensity for Singapore investment properties was 0.153 tCO₂e/m² in FY2025, 4.4% lower than 0.160 tCO₂e/m² in FY2024. The UK properties recorded an emissions intensity of 0.156 tCO₂e/m² in FY2025, a reduction of 7.6% from 0.169 tCO₂e/m² in FY2024.

WATER AND WASTE

In FY2025, our Group consumed a total of 172,194 m³ of water, a 7.1% reduction compared to the 185,328 m³ used in FY2024. The reduced water consumption in Singapore and UK was due to various water saving measures implemented such as dual flush toilet systems, timed urinal flushing and changing the bed and bathroom linen at the hotels on a 3-day cycle. Shower flow restrictors were also added in refurbished hotel bathrooms. LED and motion-activated lighting were installed where appropriate to reduce electricity usage in public spaces. In our hotels, the Greener Stay initiative continued to be adopted to reduce frequency of linen change and other housekeeping services, without compromising on customer experience and service standards.



The total water consumption in Singapore declined significantly by 18.1% to 83,749 m³ in FY2025, from 102,197 m³ in FY2024. Properties in the UK consumed 85,835 m³, a slight 3.3% increase from 83,131 m³ in FY2024.

The Group's overall water intensity improved by 25.8% to 1.79 m³/m² of floor area in FY2025 compared to 2.41 m³/m² of floor area in FY2024. The Singapore investment properties recorded a 18.2% reduction to 2.65 m³/m² in FY2025, compared to 3.24 m³/m² in FY2024. The UK properties however recorded an increase of 1.6% to 1.88 m³/m², compared to 1.85 m³/m² in FY2024.

Our investment properties in Singapore generated a total of 2,296 tonnes of waste in FY2025, of which 200 tonnes (8.7%) was recycled. This was 0.8% higher than the 2,277 tonnes of waste in FY2024, of which 282 tonnes (12.7%) was recycled.

GRI CONTENT INDEX

Statement of Use	Heeton Holdings Limited has reported in accordance with the GRI Standards 2021 for the period 1 January 2025 to 31 December 2025.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	Not Applicable

GRI Standard	Disclosure	Page Number / External Reference
GRI 2	General Disclosures 2021	
2-1	Organizational details	3
2-2	Entities included in the organization's sustainability reporting	7
2-3	Reporting period, frequency and contact point	7, 8
2-4	Restatements of information	Nil
2-5	External assurance	Nil
2-6	Activities, value chain and other business relationships	Corporate website
2-7	Employees	14-15
2-8	Workers who are not employees	Nil
2-9	Governance structure and composition	Report on Corporate Governance, Annual Report
2-10	Nomination and selection of the highest governance body	Report on Corporate Governance, Annual Report
2-11	Chair of the highest governance body	Report on Corporate Governance, Annual Report
2-12	Roles of the highest governance body in overseeing the management of impacts	Report on Corporate Governance, Annual Report
2-13	Delegation of responsibility for managing impacts	Report on Corporate Governance, Annual Report
2-14	Roles of the highest governance body in sustainability reporting	11
2-15	Conflicts of interest	Report on Corporate Governance, Annual Report
2-16	Communication of critical concerns	11-12
2-17	Collective knowledge of the highest governance body	Report on Corporate Governance, Annual Report
2-18	Evaluation of the performance of the highest governance body	Report on Corporate Governance, Annual Report
2-19	Remuneration policies	15-16
2-20	Process to determine remuneration	15-16
2-21	Annual total compensation ratio	15-16
2-22	Statement on sustainable development strategy	4
2-23	Policy commitments	11-13
2-24	Embedding policy commitments	11-13
2-25	Processes to remediate negative impacts	11-13
2-26	Mechanisms for seeking advice and raising concerns	12
2-27	Compliance with laws and regulations	12
2-28	Membership associations	Heeton Holdings is an Ordinary Member of the Real Estate Developers' Association of Singapore
2-29	Approach to stakeholder engagement	9
2-30	Collective bargaining agreements	None
GRI 3	Material Topics 2021	
3-1	Process to determine material topics	9-10

GRI Standard	Disclosure	Page Number / External Reference
3-2	List of material topics	10
3-3	Management of material topics	9-11
GRI 205	Anti-corruption 2016	
205-1	Operations assessed for risks related to corruption	11-12
205-2	Communication and training about anti-corruption policies and procedures	11-12
205-3	Confirmed incidents of corruption and actions taken	11-12
GRI 302	Energy 2016	
302-1	Energy consumption within the organization	27
302-3	Energy intensity	27
GRI 303	Water and Effluents 2018	
303-5	Water consumption	28-29
GRI 305	Emissions 2016	
305-1	Direct (Scope 1) GHG emissions	28
305-2	Energy indirect (Scope 2) GHG emissions	28
305-4	GHG emissions intensity	28
GRI 306	Waste 2020	
306-3	Waste generated	29
306-4	Waste diverted from disposal	29
GRI 401	Employment 2016	
401-1	New employee hires and employee turnover	16-17
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	15-16
GRI 403	Occupational Health and Safety 2018	
403-1	Occupational health and safety management system	18-19
403-2	Hazard identification, risk assessment, and incident investigation	18-19
403-4	Worker participation, consultation, and communication on occupational health and safety	18-19
403-5	Worker training on occupational health and safety	18-19
403-6	Promotion of worker health	18-19
403-9	Work-related injuries	5-6
GRI 404	Training and Education 2016	
404-1	Average hours of training per year per employee	17
404-3	Percentage of employees receiving regular performance and career development reviews	17-18
GRI 405	Diversity and Equal Opportunity 2016	
405-1	Diversity of governance bodies and employees	14-15
GRI 414	Supplier Social Assessment 2016	
414-1	New suppliers that were screened using social criteria	12-13
GRI 416	Customer Health and Safety 2016	
416-1	Assessment of the health and safety impacts of product and service categories	18-19

TCFD INDEX

Core Content	Recommended Disclosures	References and Remarks
1. Governance Disclose the organization's governance around climate-related risks and opportunities	a) Describe the board's oversight of climate-related risks and opportunities	Page 11: The Board oversees the corporate governance structure and sustainability strategy of the Group, including climate-related issues.
	b) Describe management's role in assessing and managing climate-related risks and opportunities	Page 11: The Management implements, monitors and reports on ESG performance, including climate-related issues.
2. Strategy Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material	a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term	Pages 22-26: We have identified the climate-related risks and opportunities over the short, medium and long-term.
	b) Describe the impact of climate-related risks and opportunities on the organization's business, strategy, and financial planning	Pages 22-26: We have identified the qualitative impact of the climate-related risks and opportunities.
	c) Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	Pages 22-26: We have considered two divergent scenarios in our assessment of climate-related risks and opportunities.
3. Risk Management Disclose how the organization identifies, assesses, and manages climate-related risks	a) Describe the organization's processes for identifying and assessing climate-related risks	Page 11: The Board has established a Risk Management Committee to oversee the Group's risk management framework and policies.
	b) Describe the organization's processes for managing climate-related risks	Page 11: The Risk Management Committee tracks and manages all enterprise risks, including climate-related risks. Details of the Committee's responsibilities can be found in the Group's Annual Report.
	c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management	Page 11: The Risk Management Committee has incorporated climate-related risks into its overall risk universe for ongoing monitoring and management.
4. Metrics and Targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	a) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process	Page 26: Heeton is using Scope 1 emissions, Scope 2 emissions and emissions intensity as the primary metrics to assess climate-related risks and opportunities.
	b) Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	Pages 28: Heeton has disclosed Scope 1 and Scope 2 GHG emissions.
	c) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	Pages 26: Heeton's annual target is to improve on emissions intensity. The long-term goal is to switch to greener fuels and renewable energy.



HEETON

HEETON HOLDINGS LIMITED

60 Paya Lebar Road

#08-36 Paya Lebar Square

Singapore 409051

Tel: (65) 6456 1188

Fax: (65) 6455 5478

www.heeton.com