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This sustainability report has been prepared by Sitra Holdings (International) Limited (the "Company" or "Group") and its contents have been reviewed by the Company's sponsor, RHT Capital Pte. Ltd. (the "Sponsor"), for compliance with the relevant rules of the Singapore Exchange Securities Trading Limited ("SGX-ST"). The Sponsor has not independently verified the contents of this sustainability report.

This sustainability report has not been examined or approved by the SGX-ST and the SGX-ST assumes no responsibility for the contents of this sustainability report, including the correctness of any of the statements or opinions made or reports contained in this sustainability report.

The contact person for the Sponsor is Mr. Leong Weng Tuck (Telephone no.: +65 6381 6757) at 9 Raffles place #29-01, Republic Plaza Tower 1 Singapore 048619.

**Board** Statement

Sustainability is the crux of the success of any enterprise, especially enterprises with the conviction to achieve triple bottomline, namely 'People, Profit, Planet', for the benefits of both private enterprise and society.

At Sitra Holdings (International) Limited ("Sitra" or "Group"), we are committed to uphold the highest standards of Economic, Social and Governance (ESG) practices within our organisation. While we are taking our first steps in the sustainability journey, we have embraced our corporate social responsibility with conviction and fervour.

We believe our sustainable growth and success is only possible with the sustainable development of the communities we operate in, be it social, business or national communities.

Driving long term sustainability is our vision. Centred on our key material issues, we have charted a four-pronged approach to our sustainable development roadmap. We will endeavour to set ourselves on the journey of achieving a good balance between financial growth and ESG performance.

Corporate social responsibility is in the DNA of our organisation. As one of the leading companies in the wood-based products and lifestyle furniture industry, we demonstrate our commitment through the adoption of responsible business practices. The Group is committed to complying with all applicable laws and regulations in all the markets we operate in. The Board expects all Group employees to be vigilant to maintain the corporate values and high quality of the Group's products and services.

Over the years, we have actively supported industry and community programmes under Forest Stewardship Council ("FSC"). We believe in the success of responsible supply chain management in ensuring the sustainable forestry supply for the wood-based products and lifestyle furniture industry to flourish.

Moving forward, we believe that long term investment in human capital is the key to the long-term sustainable success of Sitra Group. Therefore, we are committed to invest in strengthening our staff training and development roadmap, as well as enhancing the environmental sustainability of our operations.

Yours Sincerely,

**GEORGE CHEW AH BA** 

Executive Chairman & Chief Executive Officer

# **Corporate** Profile

Sitra Holdings (International) Limited ("Sitra" or the "Company") and its subsidiaries (the "Group") is an international distributor of high quality wood-based products and premium lifestyle outdoor furniture and accessories. The Group markets its products under its proprietary Comcia, decKING and Pacific product range.

The Group's products can be categorised into two main Groups, namely (i) high-value wood-based products such as decks and deckings systems, flooring, a full range of fences, and other DIY products; and (ii) premium lifestyle furniture such as outdoor garden furniture, garden accessories and contract furnishings.

Sitra was awarded the Forest Stewardship Council ("FSC") Chain of Custody aimed towards responsible forestry management since 2007. The timber used to manufacture its products can be traced throughout the supply chain

from the source of timber to the sale of Sitra's products. The Group serves a network of over 290 corporate customers in 58 countries spanning North America, Europe, Australia/ New Zealand and the Asia.

With its lifestyle furniture, Sitra developed its own products and brands and have gained a loyal following amongst major customers in Europe.

We are also accredited with the ISO9001:2015 certification.



0059



### **Our Brands**

### Comcia

Under the Comcia brand, we provide a wide variety of high value wood-based products such as decking, flooring, fencing, door and window components and other moulded products.

Each category of our woodbased products offer different designs, specifications and dimensions to suit the varying requirements of our customers.

### decKING

As our decking products gain in momentum, the "decKING" brand name was developed in 2004, to reflect our vision - that is to be a leader in this growing segment.

### **Pacific**

The "Pacific" range of brands was developed in 2003 as we embarked on a new segment of business-outdoor lifestyle furniture.

The word, Pacific, signifies peace and the feeling of being at one with nature.

### Sustainable Forestry & Design

We aim to promote sustainable supply chain and product design for the wood-based products industry. This will, in turn, ensure the sustainability in the supply of hardwood.

In addition, the Group has put in place a Responsible Wood Purchasing Programme to ensure that timber is sourced only from forests engaged in responsible forest management as set by Forest Stewardship Council ("FSC").

### Forest Stewardship Council

FSC is an international organisation that brings people together to find solutions which promote responsible stewardship of the world's forests. FSC is also set out to promote environmentally appropriate, socially beneficial and economically viable management of the world's forests. For more information, please visit www.fsc.org.

Through consultative processes, FSC sets international standards for responsible forest management. It accredits independent third party organisations which can certify forest managers and forest product producers to FSC.

In 2017, the assessment of our facility in Singapore has been conducted in accordance with the protocols of the Forest Stewardship Council® A.C. (FSC®). The certificate covers our timber accessories such as the trade of decking, flooring, beams, mouldings, fences, trellises, deck tiles, poles, roll borders, planter boxes, pickets and garden furniture using the transfer system. The facility is hereby Chain of Custody certified to sell FSC100% and FSC Mix products in accordance to FSC Standard: FSC-STD-40-004 V3-0; FSC-STD-50-001 V12.

# **SCOPE**OF REPORT

At Sitra Holdings (International) Limited we recognise the importance of sustainability to our business. As we embark on our first journey of sustainability reporting, the challenges and material issues that are important to our stakeholders, our strategy in managing these challenges and issues, and how we have performed in terms of our key performance indicators are highlighted in this report.

During the year, we adopted a more formal reporting approach by applying the international reporting framework, Global Reporting Initiative ("GRI") Standards, in preparing our first sustainability report.

For reference to the GRI Content Index, please refer to Page 18-22.



# Our Strategic Approach to Sustainability

With our vision and corporate values in mind, we aim to integrate sustainability into the businesses of Sitra so that it is systematic and seamless. Where possible, we incorporate sustainability considerations in our decisionmaking processes.

Our sustainability efforts are led by our senior management who ensures that the Company's business objectives are in line with our commitments to sustainable development. Senior management is responsible for on-going communication to the Board of Directors.

Sitra's senior management has determined focus areas where Sitra can have the greatest economic, environmental and social impact, as well as the areas that are most important to our stakeholders.

The Group has taken efforts to seek the opinion of internal and external stakeholders either formally or informally. We aspire to understand the needs and expectations of our key stakeholders and strive to build mutually beneficial relationships.

### Governance Structure



# **Reporting** Boundaries and Standards

The report is also prepared in accordance with GRI Principles for defining report content, including:

### • Materiality:

focusing on issues that impact business growth and are of utmost importance to stakeholders;

### Stakeholder Inclusiveness:

responding to the identification of stakeholder expectations and interests:

### • Sustainability Context:

presenting performance in the wider context of sustainability; and

### • Completeness:

including all information that is of significant economic, environmental and social impact to enable stakeholders to assess the Company's performance.

## Report Period and Scope

We use a consolidated operating approach to determine organisational boundaries. Our data is an aggregation of our operations in Singapore and Indonesia for the first year. As this is our first report, our base year is 2017.

This report covers data and information from 1 January 2017 to 31 December 2017 and discusses Sitra's achievements and performance towards Environmental, Social and Governance ("ESG") issues. This report has been prepared in accordance to the GRI Standards: Core Option.

The electronic edition of this report is available at: www. sitraholdings.com

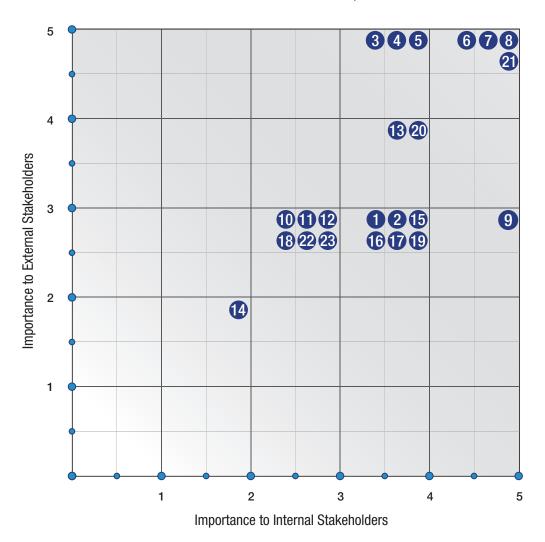
# **Accountability** to Stakeholders

We strive to be a corporate responsible citizen by working closely with our stakeholders to understand their concerns and feedbacks. The stakeholder engagement provides valuable information for our sustainability reporting, particularly in determining the material environmental

and social issues. We will continue to engage our external stakeholders more extensively to identify areas that are material, sustainable and necessary for future development.

Our Key Stakeholders	How We Engage Them	<b>Key Topics</b>
Customers	Business meetings Informal feedbacks Social Media such as Facebook	Product features of Sitra's wood-based products and lifestyle furniture Value proposition of Sitra Customer feedback
Shareholders	Annual General Meeting Emails and telephone calls Announcements via SGXNet	Financial results Key business developments such as acquisitions or new business developments.
Employees	Periodic townhall meetings Performance appraisals Company events Internal communication through emails and noticeboards	Information update by management to staff Staff performance
Suppliers	· Emails and telephone calls	Information update and feedbacks on their products and services
Government and Regulatory Agencies	· Consultation	Regulatory standards and guidelines
Media	Media releases Regular communication through emails and teleconferences	Financial results Key developments such as business updates

# MATERIALITY MATRIX Importance to Stakeholders



SOCIAL

	Economic Contribution to Society
AIC	2 Wages and Local Hiring
ECONOMIC	3 Economic Profitability
<u> </u>	4 Sustainable Growth
	5 Innovation & Technology
щ	6 Legal Compliance and Governance
GOVERNANCE	7 Anti-Corruption and Anti-Fraud
OVER	8 Service Quality & Responsibility
Ō	9 Employee/Public Health & Safety
	10 Water Conservation
5	11 Energy Management
ENVIRONMENT	12 Environmental Impact Assessment
VIROI	and Mitigation
	13 Waste Management
	14 Emission & Air Pollution

15	Diversity and Equal Opportunity
16	Training and Education
1	Business Partners Engagement
18	Stakeholder Engagement
19	Labour-Management Relations
20	Supply Chain & Procurement Practices
21	Customer Privacy & Data Protection
22	Socio-Economic Compliance
23	Corporate Social Responsibility

# **ECONOMIC**

## **Economic** Contribution to Society

At present, we operate in Singapore, Indonesia and France, with global distribution network extending to Europe, Australia, New Zealand. We manage our operations in accordance to our sustainability principles. We work closely with our management and key operation staff to identify and consider any sustainability opportunities and risks that may arise.

Sustainability trends such as climate change, resource scarcity and demographic changes shape the competitive environment in which companies like Sitra operate by introducing long term sustainability opportunities. We therefore view our business performance beyond short term gains and financial bottomline. Our conviction is to achieve a balanced triple bottomline (People, Planet, Profit) for sustained growth of the organisation and the communites it operates in.

The success of our business is highly dependent on the commitment of our Board of Directors, management and staff. Their knowledge, professional expertise and their job satisfaction are key to our economic sustainability.

More importantly, we strive to contribute positively to the society through our economic presence by serving as Asia

Pacific's leading wood-based products and lifestyle furniture industry globally, while maintaining good stewardship of the resources we manage and generating good shareholder value.

Our business model focuses on cost leadership without compromising on product quality. We place the highest priority on our customers' interest. We seek organic growth from the existing operations as well as growth through acquisition of new businesses that can reap good returns growth.

We strive to maintain our market position by ensuring we gain the trust of our customers, and continually build our reputation and brand name in the wood-based products and lifestyle furniture industry in Asia Pacific.

In today's highly volatile business environment, Sitra has, beyond sustained earnings, diligently embraced prudent financial management, capitalised on our assets and investments, and remained focused on growth strategies, to enhance shareholder value.

For more information on Sitra's financial and business performance, please refer to the annual report for the financial year 2017 ("FY2017").

# **ECONOMIC**

# Our Sustainability Vision



### **ECONOMIC**

- Generate positive return to shareholders
- Achieve operational efficiency
- Drive consistent growth through organic growth and acquisitions



### **ENVIRONMENTAL**

- Promote a strong environmental-friendly
- Promote environmental conservation through adoption of the 3R's (Reduce, Recycle, Reuse)



### **SOCIAL**

- Build a resilient organisation and caring society
- Build partnership with stakeholders
- Drive employee development and employee engagement



## **GOVERNANCE**

- Focus on risk management by having good corporate governance and well-developed policies and procedures
- · Achieve compliance with all applicable laws and regulations

# **GOVERNANCE**

### Compliance with Corporate Governance

Corporate governance and compliance have always been one of the top priorities for the Company. The decision-making process of the Company is strictly in line with legal and regulatory requirements and in compliance with the Code of Corporate Governance issued by Monetary Authority of Singapore and the Singapore Companies Act.

The Company has not received any correspondences or notifications in relation to any non-compliance of legal and regulatory requirements from any government and regulatory agencies in FY2017. The Audit Committee received no whistle-blowing letters during the year.

The Group is proactive in ensuring its compliance with all relevant laws and regulations. Our management team is responsible for the review and monitoring of the Group's policies and practices in respect to legal and regulatory requirements across all operations. Any non-compliance of the relevant laws and regulations and the proposed resolutions will be reported to the Board of Directors.

The Group has put in place policies and procedures to ensure compliance with the relevant laws and regulations in all the jurisdictions we operate in. At a corporate level, we also ensure that we are in compliance, with the Listing Rules of the Singapore Exchange Securities Trading ("SGX-ST"), Securities and Futures Act and Singapore Companies Act.

While we seek to leverage our data to serve our customers responsibly, we adhere and uphold the Personal Data Protection Act ("PDPA"). We have put in place policies to ensure we are in compliance with PDPA and we respect our customers' choices in respect of their personal data and the protection of our customers' privacy.

There is no incidence of product and service misinformation and labelling or marketing miscommunications.

## **Ethics** & Integrity

We promote an ethical and act with integrity' culture throughout the Company and our outlets. We seek to conduct our business in an ethical manner and uphold best practices in the wood-based products and lifestyle furniture industry. All Directors, operations and management staff are required to fully comply with our principles set in our Employee Handbook and employment contract.

The Employee Handbook details our expected standards of employee's professional behaviour towards our business partners whom we have business dealings with, to the people in the society whom we serve as customers and towards each other as employees of the Company. Above all, we are inculcated with strong corporate values to act with integrity.

## **Anti-Corruption** and Anti-Fraud

With a zero-tolerance policy to bribery and corruption, we have put in place effective monitoring and management control systems to detect bribery, fraud or other malpractice activities directly at the source. We have established a whistle-blowing mechanism for employees.

A direct whistle-blowing channel through electronic mail and writing has also been implemented to enable our employees

to get direct access to our Chief Executive Officer. By doing so, our stakeholders can be assured that all reports or suspicions of potential breaches of our employee guidelines are taken seriously by the Group. Our stakeholders can reach our Chairman of Audit Committee via telephone or email.

# **GOVERNANCE**

### Risk Management

The Group recognises the importance of risk management and how business risks may adversely affect Sitra's business performance.

While it is the responsibility of the Audit Committee, as delegated by the Board of Directors, to oversee the

effectiveness of our risk management and internal controls, the core function of the internal audit is coordinated by our Chief Financial Officer who reports to the Audit Committee on a periodic basis.

## **Supply Chain & Procurement Practices**

Our supply chain constitutes mainly the suppliers for our wood-based products and lifestyle furniture for all our global clients. We have maintained a strong partnership with the suppliers for our wood-based products and lifestyle furniture businesses.

We believe in transparency in our supply chain and our approach is to positively engage with suppliers if we identify any issues. Any non-compliance with the guidelines of local and international regulatory bodies will result in us in not embarking on or discontinuing the procurement and business relationship with them.

# Sustainable Forestry and Design

We aim to promote sustainable supply chain and product design for the timber furniture and accessories industry. This will, in turn, ensure the sustainability in the supply of hardwood.

In addition, the Group has put in place a Responsible Wood Purchasing Programme to ensure that timber is sourced only from forests engaged in responsible forest management as set by Forest Stewardship Council ("FSC").

### Forest Stewardship Council

Since 2007, Sitra has been a member of the Forest Stewartship Council ("FSC") which is an international organization that promotes responsible stewardship of the world's forests. FSC is also set out to promote environmentally appropriate, socially beneficial and economically viable management of the world's forests.

Through consultative processes, FSC sets international standards for responsible forest management. By consulting with businesses, NGOs, communities, workers, and the indigenous people, they continually develop, and strengthen, FSC forest management and chain of custody standards. FSC forest management standards are developed at an international level, and are then adapted to individual countries' legal, social, and geographical settings, through national standards. Some elements of FSC certification, for example, controlled wood, have standards of their own.

It accredits independent third-party organisations which

can certify forest managers and forest product producers to FSC standards.

As a member of FSC, we adhere to the FSC standards, policies and procedures for forest management, controlled wood standards and risk assessments in our endeavours to play a active part in maintaining forest ecosystems and local communities.



# **ENVIRONMENT**

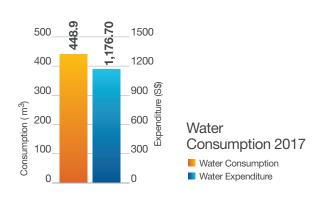
Sitra strives to embrace environmental sustainability by managing environmental conservation through adopting 'Reduce', 'Re-use', 'Recycle' and energy effcient practices.

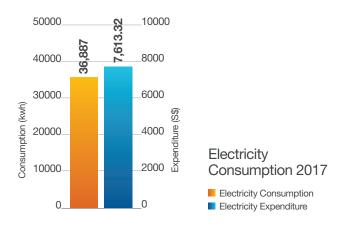
We have focused on the Singapore operations for our environmental reporting for the first year.

# Water and Energy Conservation

In Singapore, we tap on the water supply provided by Public Utilities Board and disposed used water into the public sewage system.

While we take conscientious efforts to conserve water and electricity, we are currently reviewing our utilisation rates and will implement measures to reduce the utilisation rates.





# Paper Usage

We have launched our Go-Green initiatives across all our operations and corporate office. The implemented initiatives aim to encourage the 'Re-use', 'Recycle' and 'Reduce' of papers through the following ways:

- 'Reduce' the use of papers by sending the printers to print on double-sides of each piece of paper and print only when necessary.
- 'Re-use' single-side printed papers for non-confidential and draft documents.

We are looking into recycling all used papers, printed materials and collaterals.

### Target:

We will align and finetune our environmental performance in our Singapore operations to amount of consumption and expenditure for both water and electricity in the next 1-3 years. The same efforts will be extended to our Indonesian operation from 2019 onwards.

### **People**

Pivotal to our success is our people performing at their best. We value the vital contributions by all employees towards sustaining Sitra's long term success. To underscore our care and commitment towards our employees, the Group drives a human resource ("HR") strategy focused on fair remuneration and equal opportunities, training and development, employee wellness and engagement, and work-life harmony.

We are taking progressive steps to develop and implement policies and staff engagement programmes that aim to help employees build long-term, fulfilling careers with Sitra.

# **Diversity & Equal Opportunity**

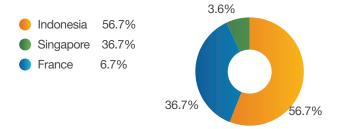
Identifying, recognising and rewarding quality employees is essential in our hiring and retention strategy. We advocate fair employment practices by ensuring equal opportunities for recruitment, fair compensation, career progression and training opportunities. We provide fair employment opportunities to all, regardless of age, gender, race, or nationality. Sitra advocates a policy of harnessing diversity in human resource as evidenced by a fair distribution of employees from different nationalities and age groups to support our key markets in Singapore and Indonesia.

Local hiring is emphasized as 100% of Sitra's employees are mainly citizens of the 3 key countries it operates in. Sitra has 100% local citizens as employees in its three locations in 2017.

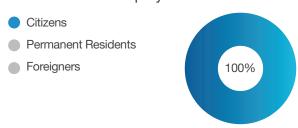
We advocate gender diversity in our management team. We have two female senior management staff among our senior management team.

There is a good balance in gender ratio between male and female employees. We ensure that fair work practices and remuneration are ascertained based on individual work performance and not on any gender consideration. No form of discrimination is tolerated within our organisation. There is no incident of discrimination and corrective actions taken.

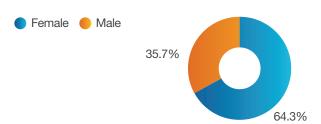
### Size of Employees



### Nationalities of Employees



### Gender Ratio



## Fair & Open Employment Policy

Sitra maintains fair and open employment policy through providing fair employment opportunities to both young and mature workers. Its workforce has a good balance of age distribution, with 40% under the 40 year old group.

Our strategy for recruitment and retention of talents include cooperation with professional institutions, talent pool development and retention, and staff grievance mechanism.

In terms of employee skills profile, we have maintained a fair proportion of professional and management team to lead and drive the business growth in our three business segments.

Our business is highly dependent on senior experienced staff who have been in the wood-based products and lifestyle furniture businesses for over 20 years. Through the organic growth of complementary businesses over the years, we have also strengthened the retention of our pool of talented staff whose professional expertise and strong customer relationship has been critical in the sustainable success of our wood-based products and lifestyle furniture business.

We will continuously recruit talents, particularly good talents, and groom them through mentorship and on-the-job training programmes.

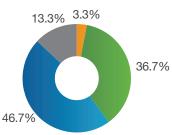
Our recruitment policy is based on the pre-requisite skills and academic qualifications necessary to perform the required job scope. During recruitment, we have implemented stringent shortlisting process to ensure we recruit successful candidates with the same values as us.

We understand the importance of talent retention by providing fair and sustainable financial and non-financial incentives, and learning and development opportunities. We have in place employee share option scheme and performance share plan to incentivise our employees to achieve high performance. Our compensation and benefits policies are determined by guidelines proposed by our Human Resource and approved by the Remuneration Committee of our Board. All staff undergo annual performance review and receive periodic performance feedbacks from their reporting managers.

In 2017, the overall turnover rate of 9.4%. We have no temporary or part-time employees.

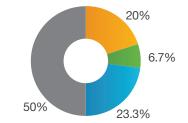
### Employee Age Profile





### PMET Classification for Staff





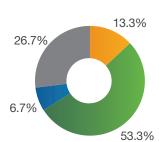
As at 31 Dec 2017

As at 31 Dec 2017

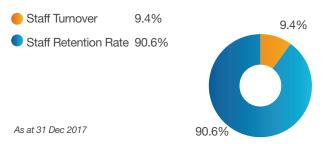
### Years of Service

As at 31 Dec 2017





### Staff Turnover and Retention



# **Employee** Wellness & Benefits

The Group meets all the laws and regulations for manpower employment in the three key markets where we have direct business operations.

In Singapore, the Group contributes to the Central Provident Fund Scheme and obtains medical benefits such

as hospitalisation and surgical plans for all our staff. We provide maternity as well as paternity leave in accordance with the recommendations of the Ministry of Manpower of Singapore.

# **Training & Staff** Development

One of our main challenge is to attract and retain talents. To this end we have developed and we actively communicate on our brand and company values. Apart from providing fair and sustainable financial incentives to our employees, we also strive to create a culture of learning organisation through the following ways:

### • Training and Skills Upgrading Opportunities

We are constantly developing our employees through providing annual performance review. We will continue to equip our staff with training through conferences and courses related to their work areas.

### **Training & Education 2017**

Total training hours	104.5	
Average training hours per employee	9.5	

We plan to implement mentorship programme for the senior staff to impart their experiences and skills to the younger staff in the next 1-3 years.

## **Health** and Safety

The Group is committed to embracing the highest standards of workplace, safety and health and environmental practices and inculcating the best practices in the Group. We are guided by our steadfast commitment to our employees for a safe working environment in which one can work and excel with full confidence.

The management team sets a strong foundation by providing clear direction within the organisation of the value of an effective occupational health and safety management approach to foster risk-free and environmentally-friendly premises. We are building the environmental awareness and green practices to lead the group in adhering to all WSH regulations as stipulated by the Ministry of Manpower ("MOM"), Workplace Safety and Health Council ("WSHC") and all the relevant authorities of the national jurisdictions we operate in. We have obtained bizSAFE 3 certification for our operations in Singapore.

Our operations are closely monitored and reviewed by our appointed safety officers, who ensure all employees comply with safety policies and procedures. Our emphasis on promoting workers' health and improving occupational safety has resulted in zero accidents in our workplace and we will continue to uphold our mandate to target zero injuries and fatalities amongst our workforce.



# **Labour-Management** Relations

It is important to have effective communication between management and employees, so that employees are more engaged with the organisation, and have a more positive attitude towards their work and loyalty to the Group. The employees are provided with frequent management updates and adequate notice period regarding operational changes.

We often engage our employees in regular meetings and periodic announcements via emails.

# **Business Partner** & Stakeholder Engagement

We engage our business partners and stakeholders to keep them abreast of the developments of our businesses.

Please see the section on Accountability to Stakeholders on page 6 for more information.

## **Customer Privacy** & Data Protection

The Group warrants high level of security and confidentiality of our clients' personal data as well as the business transactions they have undertaken.

We adhere strictly to the guidelines set by the Personal Data Protection Act (PDPA) 2012.

# Corporate Social Responsibility

Being a corporate responsible citizen, we believe in giving back to the society. While we strive to achieve our business goals, we also believe in playing our part in serving our local community.

Our Indonesian subsidiary is a member of the Global Forest and Trade Network-Indonesia under the World Wildlife Fund.



### Target:

We will be supporting more community programmes in the next 1-3 years.

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102-55	GRI content index	18-22
102-56	External assurance	N.A.
Management A	Approach	
103-1	Explanation of the material topic and its Boundary	3,5
103-2	The management approach and its components	5-6
103-3	Evaluation of the management approach	5-6
Specific Stand	ard Disclosures	
Category: Eco	nomic	
Topic: Econom	nic Performance	
201-1	Direct economic value generated and distributed	8-9
201-2	Financial implications and other risks and opportunities due to climate change	N.A.
201-3	Defined benefit plan obligations and other retirement plans	14-15
201-4	Financial assistance received from government	N.A.
Topic: Market	Presence	
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	N.A. The staff are professional executives and there is no minimum wage in Singapore
202-2	Proportion of senior management hired from the local community	13
Topic: Indirect	Economic Impacts	
203-1	Infrastructure investments and services supported	N.A.
203-2	Significant indirect economic impacts	N.A.
Topic: Procure	ment Practices	
204-1	Proportion of spending on local suppliers	6
Topic: Anti-co	ruption	
205-1	Operations assessed for risks related to corruption	10
205-2	Communication and training about anti-corruption policies and procedures	10
205-3	Confirmed incidents of corruption and actions taken	10
_30 0	55od moldonto or corraption and dottorio taken	10

Topic Speci	fic Standard Disclosure	Page Reference
Topic: Anti-c	ompetitive Behavior	
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	N.A.
Category: En	vironmental	
Topic: Materi	als	
301-1	Materials used by weight or volume	N.A.
301-2	Recycled input materials used	N.A.
301-3	Reclaimed products and their packaging materials	N.A.
Topic: Energy	y .	
302-1	Energy consumption within the organization	11
302-2	Energy consumption outside of the organization	N.A.
302-3	Energy intensity	N.A.
302-4	Reduction of energy consumption	N.A.
302-5	Reductions in energy requirements of products and services	N.A.
Topic: Water		
303-1	Water withdrawal by source	11
303-2	Water sources significantly affected by withdrawal of water	N.A.
303-3	Water recycled and reused	N.A.
Topic: Biodiv	ersity	
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	N.A
304-2	Significant impacts of activities, products, and services on biodiversity	N.A
304-3	Habitats protected or restored	N.A
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	N.A.
Topic: Emiss	ions	
305-1	Direct (Scope 1) GHG emissions	N.A.
305-2	Energy indirect (Scope 2) GHG emissions	N.A.
305-3	Other indirect (Scope 3) GHG emissions	N.A.
305-4	GHG emissions intensity	N.A.
304-5	Reduction of GHG emissions	N.A.
305-6	Emissions of ozone-depleting substances (ODS)	N.A.
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	N.A.
Topic: Effluer	nts and Waste	
306-1	Water discharge by quality and destination	12
306-2	Waste by type and disposal method	N.A.
306-3	Significant spills	N.A.
306-4	Transport of hazardous waste	N.A.
306-5	Water bodies affected by water discharges and/or runoff	N.A.
Topic: Enviro	nmental Compliance	
307-1	Non-compliance with environmental laws and regulations	N.A.
Topic: Suppli	er Environmental Assessment	
308-1	New suppliers that were screened using environmental criteria	N.A.
308-2	Negative environmental impacts in the supply chain and actions taken	N.A.

Topic Specific Standard Disclosure		Page Reference
Category: Soci	ial	
Aspect: Employ		
401-1	New employee hires and employee turnover	14
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	N.A. We do not employ part-time staff
401-3	Parental leave	15
Topic: Labor/M	Ianagement Relations	
402-1	Minimum notice periods regarding operational changes	16
Topic: Occupat	tional Health and Safety	
403-1	Workers representation in formal joint management–worker health and safety committees	14
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	16
403-3	Workers with high incidence or high risk of diseases related to their occupation	N.A.
404-4	Health and safety topics covered in formal agreements with trade unions	N.A.
Topic: Training	and Education	
404-1	Average hours of training per year per employee	15
404-2	Programs for upgrading employee skills and transition assistance programs	15
404-3	Percentage of employees receiving regular performance and career development reviews	14
Topic: Diversity	y and Equal Opportunity	
405-1	Diversity of governance bodies and employees	N.A.
405-2	Ratio of basic salary and remuneration of women to men	N.A.
Topic: Non-disc	crimination	
406-1	Incidents of discrimination and corrective actions taken	12
Topic: Freedon	n of Association and Collective Bargaining	
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	N.A.
Topic: Child La	bor	
408-1	Operations and suppliers at significant risk for incidents of child labor	N.A.
Topic: Indirect	Economic Impacts	
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	N.A.
<b>Topic: Security</b>	Practices	
410-1	Security personnel trained in human rights policies or procedures	N.A.
Topic: Rights o	f Indigenous Peoples	
411-1	Incidents of violations involving rights of indigenous peoples	N.A.
Topic: Human Rights Assessment		
412-1	Operations that have been subject to human rights reviews or impact assessments	N.A.
412-2	Employee training on human rights policies or procedures	N.A.
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	N.A.
Topic: Local Co	ommunities	
413-1	Operations with local community engagement, impact assessments, and development programs	17
413-2	Operations with significant actual and potential negative impacts on local communities	N.A.

Topic Specific Standard Disclosure		Page Reference	
Topic: Suppli	er Social Assessment		
414-1	New suppliers that were screened using social criteria	N.A.	
414-2	Negative social impacts in the supply chain and actions taken	N.A.	
Topic: Public	Topic: Public Policy		
415-1	Political contributions	N.A.	
Topic: Custo	mer Health and Safety		
416-1	Assessment of the health and safety impacts of product and service categories	N.A.	
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	N.A.	
Aspect: Marketing and Labeling			
417-1	Requirements for product and service information and labeling	N.A.	
417-2	Incidents of non-compliance concerning product and service information and labeling	N.A.	
417-3	Incidents of non-compliance concerning marketing communications	N.A.	
Aspect: Cust	Aspect: Customer Privacy		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	17	
Aspect: Soci	Aspect: Socioeconomic Compliance		
419-1	Non-compliance with laws and regulations in the social and economic area	10	

### Note:

Sitra takes a phased approach to the adoption of GRI indicators and will review the relevance of indicators marked as N.A.to its operations annually.