

APPENDICES AND ANNEXES

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TABLE 1. SUSTAINABILITY DISCLOSURE TOPICS & ACCOUNTING METRICS

TOPIC	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	CODE	PAGE NUMBER
Data Security	Description of approach to identifying and addressing data security risks	Discussion and Analysis	N/A	SV-PS-230a.1	64-66
	Description of policies and practices relating to collection, usage, and retention of customer information	Discussion and Analysis	N/A	SV-PS-230a.2	65, Annex G
	(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI) or personally identifiable information (PII), (3) number of customers affected	Quantitative	Number, Percentage (%)	SV-PS-230a.3	66
Workforce Diversity & Engagement	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	Quantitative	Percentage (%)	SV-PS-330a.1	42-43
	(1) Voluntary and (2) involuntary turnover rate for employees	Quantitative	Rate	SV-PS-330a.2	46
	Employee engagement as a percentage	Quantitative	Percentage (%)	SV-PS-330a.3	43
Professional Integrity	Description of approach to ensuring professional integrity	Discussion and Analysis	N/A	SV-PS-510a.1	63
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	Quantitative	Reporting currency	SV-PS-510a.2	63

TABLE 2. ACTIVITY METRICS

ACTIVITY METRIC	CATEGORY	UNIT OF MEASURE	CODE	PAGE NUMBER
Number of employees by: (1) full-time and part-time, (2) temporary, and (3) contract	Quantitative	Number	SV-PS-000.A	42
Employee hours worked, percentage billable	Quantitative	Hours, Percentage (%)	SV-PS-000.B	43

ANNEX A: HUMAN RIGHTS POLICY

VICOM's Human Rights Commitment is guided by the Universal Declaration of Human Rights and the United Nation's Global Compact's Principles on Human Rights in aspects of our employment practices as well as Workplace Health and Safety.

This policy highlights our responsibility and response in relation to protecting the rights of employees within the VICOM in all locations that we operate in.

1. PROHIBITION OF UNETHICAL LABOUR PRACTICES

VICOM does not engage in nor tolerate unethical labour practices such as child labour or forced labour. We strive to uphold and honour the relevant local, national and international laws and conventions where we operate and put in place measures to ensure no unethical labour practices exists within the Group.

2. FAIR EMPLOYMENT PRACTICES

We adhere to applicable employment related legislations and guidance in locations where we operate in. Specifically, in Singapore, we are committed to the Tripartite Guidelines for Fair Employment Practices released by the Tripartite Alliance for Fair and Progressive Employment Practices. The working hours of VICOM's shall comply with the applicable legislations where the employees are situated. In relation to our Sustainability Framework, VICOM strives to ensure:

- Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all our employees.

3. GROWING OUR PEOPLE

In VICOM, growing our Talent Base is one of our 3 key strategies for success. Our people must be prepared and equipped with the right mindset, skills and competencies for the next lap. We approach development with an inclusive approach. We want to develop leaders at all levels systematically with a view on continual learning and team collaboration. In relation to our Sustainability Framework, VICOM strives to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

In tandem with developing our talent base, VICOM is committed to providing a challenging environment with ample opportunities for growth so that our talent can realize their full potential.

4. DIVERSITY & INCLUSION

VICOM embraces diversity. We believe in creating an inclusive environment where our employees treat each other equally and with respect. We want to nurture a culture where diverse perspectives can help drive VICOM forward and equal opportunities are given to all our staff.

VICOM is committed to creating a culture of diversity, inclusion, and equal opportunity. We strive to provide a fair and supportive work environment for all our employees, regardless of their age, sex, marital status, sexual orientation, disability, race, colour, nationality, ethnic or national origin, religion, or affiliation to any political party or trade union. We aim to employ people who reflect the diverse nature of society and we value each of our employees' contributions, both individually, and as part of VICOM.

Beyond just physical safety, VICOM also strives to ensure a safe psychological environment where our employees can work in, without fear of presenting their diverse views without repercussions and discrimination.

5. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

VICOM recognizes and respects our employees' freedom of association and rights to representation through the appointed trade union.

We are committed to the concept of Tripartism and strives to build and maintain progressive relationships with the Trade Unions and their representatives.

6. FAIR AND SAFE WORKING CONDITIONS

As laid out in VICOM's Sustainability Framework, one of the key pillars of "Prioritising our people, communities and the society with a responsible and philanthropic lens", Health and Safety of our customers and employees and the public is fundamental to our business. Our focus on safety is strongly reflected in the VICOM's policies, procedures and training. We take all safety incidents seriously and we continuously work towards achieving zero fatalities and injury rates that are below WSH/national averages in our locations of operation.

ANNEX B: WHISTLE BLOWING POLICY

1. WHAT IS WHISTLEBLOWING?

As employees are expected to abide by the principles of the Code of Business Conduct ("Code") and also maintain and demonstrate the highest professional standards and ethical conduct in the performance of their duties, they are encouraged to bring to the attention of Management any violations of the Code; and/or any unethical or unlawful business conduct or dealings, with the intention for necessary corrective actions to be taken to address the violations.

2. WHO IS A WHISTLEBLOWER?

A whistleblower may be an employee or external party who, in the course of his/her duties or personal engagement with the Company or employee, has witnessed or who has knowledge that another fellow employee has previously engaged, is currently engaging or will be engaging in practices/activities that will be in violation of the Code, or unethical or unlawful business conduct or dealings, and decides to highlight these practices to Management with a view that necessary corrective actions will be taken to prevent the occurrence of such undesired practices/ activities.

Whistleblowing is not a means by which anyone including a disgruntled employee can abuse, wreak revenge on or sabotage another person or fellow employee without any just cause or to hold an employee at ransom. Any action of whistleblowing must be genuine, substantiated with proper evidence, and directed to the VICOM Alert Line within a reasonable time. Where necessary, employees must be prepared to testify or provide statement of such actions. It should not be unfounded or malicious allegations made against another employee. VICOM will not tolerate the abuse of this Whistleblowing process.

A whistleblower need not have to be directly or indirectly affected by or have a personal interest in the outcome of the actions giving rise to the whistleblowing. So long as an employee has a genuine concern and reasonable grounds to believe that the actions of a fellow employee is in breach or will be in breach of the Code or principles of ethical conduct and fair dealing, he can be a whistleblower. However, the whistleblower must act in good faith at all times.

The Policy allows for reporting by Employees or External Parties of such matters, without fear of reprisal, discrimination or adverse consequences, and also permits VICOM to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

3. ACTIVITIES GIVING RISE TO WHISTLEBLOWING

Listed below are some activities that could potentially give rise to whistleblowing. It is not an exhaustive list:

- Theft, damage or misappropriation of company's properties, using company's properties for own benefit or any unlawful purpose, or unlawful dissemination or disclosure of company's proprietary information, know-how and trade secrets;
- Fraud. For example:
 - i. falsification or alteration of company's records, accounts or financial information;
 - ii. submission of false invoices and claims for reimbursement of expenses;
 - iii. failure to account or misuse of company's monies in possession; and
 - iv. knowingly provide information which is false or misleading;
- Engaging in activities prohibited by law; or activities in breach of any legal or contractual obligations. For example failure to perform any material terms of any contract or agreement without any lawful reason;
- Unlawful or Unethical conduct. For example violence, threatened violence, bullying, bribery or acceptance of monies, gifts or monetary benefits in exchange for personal favours;
- Making statements or remarks which are defamatory or cause disruption to racial harmony;
- Sexual harassment or adopting discriminatory practices;
- Trading in the shares of VICOM and its subsidiaries while in possession of materially confidential and price-sensitive information including the procuring or providing of such information to any third party to deal in such shares;
- Misuse, including the downloading and sending of information which will infringe third party's copyright; information that is derogatory or offensive to a third party;
- Engage in activities or practices that will pose a danger to the health and safety of others or the environment;
- Conflict of interest without disclosure. For example, a superior and his/her direct reporting subordinate are in a relationship; and
- Breach of VICOM's policies or the Code of Business Conduct.

ANNEX C: SUPPLIER CODE OF CONDUCT

VICOM LTD is committed to the highest standards of ethical conduct, social and environmental responsibility and commitment to sustainability.

VICOM and its subsidiaries (hereinafter collectively referred to as "VICOM") procures a wide range of goods or services from various businesses, companies, corporations, persons and entities, including their employees, agents and representatives (hereinafter collectively referred to as "Suppliers").

VICOM requires and expects its Suppliers to operate in accordance with the principles in this Supplier Code of Conduct ("Code") and in full compliance with all applicable laws and regulations. Suppliers are required to adhere to all applicable laws (including but not limited to antitrust, anti-competition, anti-corruption and anti-fraud policies), maintain high ethical standards, have clear health and safety policies, strict environmental policies, and adopt fair employment practices.

It is the responsibility of Suppliers to ensure their employees and representatives understand, comply and act consistently with this Code. Failure to adhere to this Code may result in disqualification from consideration for business, and/or future business, with VICOM.

1. COMPLIANCE WITH LAWS AND REGULATIONS

1.1. Abidance with the Law

Suppliers' business operations, as well as all goods and services supplied to VICOM, must fully comply with the laws and regulations of the countries where Suppliers' operations are based as well as where goods and services are provided to VICOM.

1.2. Use of Fair Business Practices

Suppliers must practise fair competition in accordance with local antitrust and competition laws. Activities that restrict competition must be avoided. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independent of understandings or agreements with competitors.

2. ETHICS AND CONFLICT OF INTEREST

2.1. Anti-Corruption Stance

Suppliers must conduct their business with integrity, transparency and honesty. VICOM does not condone any corrupt practices such as bribery, extortion or embezzlement in all business interactions. Suppliers are prohibited from offering, paying, soliciting or receiving (whether directly or otherwise) any form of bribe as inducement or reward for any business transaction with or involving VICOM. The term "bribe" broadly includes any illicit advantage such as (but is not limited to) cash, cash equivalents, property, loans, commissions, services, benefits in kind or other advantages.

2.2. Anti-Fraud Stance

In the same vein, VICOM does not condone any fraudulent practices such as intentional deception, misappropriation of resources or manipulation of data. Suppliers are prohibited from altering or falsifying records, failing to account for monies received or knowingly providing false information for any business transaction with or involving VICOM.

2.3. Gifts and Entertainment

VICOM is committed to conducting all business without undue influence. The requires it to exercise good judgment and practise moderation in receiving business gifts and entertainment. Suppliers must not offer or give gifts or hospitality (including kickbacks, favours, cash, gratuity, entertainment or anything of value) to any VICOM employee that is intended as, or may be viewed as an attempt to improperly influence business decisions. Employees will respectfully decline entertainment, gifts or other benefits that could in any way be construed as, or give the appearance of, attempting to influence business decisions in favour of any person or organisation with whom VICOM may have business dealings.

2.4. Conflicts of Interest

Suppliers should avoid any conflicts of interest that may adversely influence their business relationship with VICOM. Suppliers must disclose all actual, potential or perceived conflicts of interest situations and/ or relationships promptly to VICOM.

3. HUMAN AND LABOUR RIGHTS

3.1. Human Rights

VICOM believes that it is our responsibility to respect the human rights of the people in all the locations that we operate in. VICOM's Human Rights Commitment is guided by the Universal Declaration of Human Rights, the United Nation's Global Compact's Principles on Human Rights and the International Labour Organization (ILO) Conventions on Labour Standards in aspects of our employment practices as well as Workplace Health and Safety. To learn more on VICOM's Human Rights Policy, please visit <https://www.vicom.com.sg/sustainability>. Suppliers shall uphold and comply with the highest international standards on human and labour rights protection.

3.2. Anti-Harassment and Abuse

Suppliers shall ensure that all of their employees are humanely treated with respect and dignity. All forms of harassment and abuse, including but not limited to physical violence, sexual exploitations or abuse, verbal intimidation, psychological harassment, coercion and corporal punishments are not tolerated.

ANNEX C: SUPPLIER CODE OF CONDUCT

3.3. Non-Discriminatory Employment

Suppliers shall apply fair and ethical standards in their employment practices. This includes non-discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the bases of race, ethnicity, gender, national origin, age, religion, marital status, disability, sexual orientation or gender identity.

3.4. Ethical Employment

Suppliers must comply with all national laws on wages and working hours as well as local standards regarding child labour and minimum age.

3.5. Freedom of Association and Collective BARGAINING

Suppliers shall recognize and respect its employees' freedom of association, collective bargaining and rights to representation through the appointed trade union.

4. 4.WORKPLACE HEALTH, SAFETY AND QUALITY

4.1. Healthy and Safe Working Environment

Suppliers must have in place health and safety protection policies and management systems to provide a secure working environment. They must be designed to promote the general health of employees and reduce work-related injury and illness. For example, protective equipment and tools must be provided and replaced/ maintained regularly.

4.2. Safety

The safety of all goods and services supplied must be ensured through appropriate policies, implementation and monitoring.

4.3. Quality

Suppliers' policies and management systems must be developed to ensure that the quality of all goods and services are as specified in their contracts with VICOM.

5. CORPORATE SOCIAL RESPONSIBILITY AND ENVIRONMENTAL SUSTAINABILITY

5.1. Corporate Social Responsibility

VICOM is committed to building positive relationships with the communities in which we live and work by showing our support and care for the poor, the sick, the underprivileged and the aged. Suppliers are encouraged to support us and also seek similar opportunities in area of Corporate Social Responsibility.

5.2. Environmental Sustainability

Suppliers must endeavour to minimise the impact of their operations on the environment, and are encouraged to adopt effective environmental management practices and standards. Local environmental laws and practices such as those pertaining to waste disposal (proper handling of toxic and hazardous waste, segregation where regulated, etc), air emissions and pollution must be complied with.

Suppliers are encouraged to identify, manage and reduce its greenhouse gas emissions from its operations. This includes adoption of eco-efficient practices, green technologies and transiting to cleaner energy.

6. USE OF INFORMATION

6.1. Insider TRADING

Suppliers must not trade in the securities of VICOM either directly or through an intermediary while in possession of inside information (i.e. confidential material, non-public information) relating to VICOM nor should they pass such information on to others.

6.2. Proprietary Information

Any information used by Suppliers in their business relationship with VICOM that is either proprietary and/or not public must be protected against loss and infringement. Any disclosure or use of such information other than for the purposes of discharging its obligations to VICOM must first be authorised by VICOM.

6.3. Personal Data

Supplier shall respect and comply with all applicable laws relating to the protection of personal data, have in place reasonable physical and electronic measures to ensure the security of personal data, and use any personal data disclosed by or collected on behalf of VICOM only for the purpose(s) for which the relevant personal data is disclosed or collected.

ANNEX C: SUPPLIER CODE OF CONDUCT

7. COMMUNICATION

7.1. Training and Communication

Suppliers shall ensure adequate communication and compliance of this Code to their employees and supply chain. Where needed, suppliers shall ensure the right and adequate training is provided to employees in their supply chain.

8. RISK MANAGEMENT

8.1. Risk Management System

Suppliers are expected to put in place a risk management procedure that would allow it to identify and mitigate operational and legal compliance risks in all obligations stated in this Code. Suppliers are also encouraged to conduct regular assessment of its facilities and operations, and to extend such checks to its supply chain. It is the supplier's responsibility and obligation to inform VICOM timely in light of any alleged or actual breach of this Code.

8.2. Due Diligence

VICOM reserves the right to conduct due diligence check and audits on its suppliers for compliance with this Code. Suppliers may be requested to provide relevant policies and procedures, where necessary, access to employees and other personnel, as well as associated evidence to demonstrate adherence.

9. ETHICAL CONCERNS

If any Supplier has an actual or potential ethical concern related to the Code, they can make use of the VICOM Alert Line.

The VICOM Alert Line comprising the following personnel has been set up to facilitate the reporting of incidents and the handling of information or evidence on matters that will give rise to whistle blowing:

Group Chief Internal Audit Officer

DID: +65 6383 7010

Email to: gcao@comfordelgro.com

- and/or the respective Chairmen of Audit & Risk Committee (ARC)
- For VICOM, email to: ARC_Chairman@vicom.com.sg

ANNEX D: DIVERSITY, EQUITY AND INCLUSION

VICOM is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion.

Our human capital is our most valuable resource. The collective sum of our people's individual differences, life experiences, knowledge, creativity, innovation, self-expression, unique capabilities and talent represents a significant part of our culture.

We embrace our employees' differences in age, colour, nationality, disability, ethnicity, family or marital status, gender, language, physical and mental ability, political affiliation, race, religion, socio-economic status, and other characteristics that make our employees unique.

VICOM's DEI initiatives are applicable but not limited to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of diversity, equality and inclusion.

The Board drives VICOM's DEI Policy by setting the example of ensuring that the composition of Directors is a balance of tripartite experience from government, labour and business in order to appreciate the values of collective consensus and avoid unproductive group-think and biasness. All employees share the same values to facilitate inclusive discussions to push for innovative business developments.

All employees of VICOM have a responsibility to always treat one another with dignity and respect. All employees are expected to exhibit teamwork, cooperation and conduct that reflects inclusion at all times.

All employees are also required to attend the DEI Policy awareness training to enhance their knowledge and deepen their understanding of their responsibilities. Any employee who is found to have exhibited any inappropriate conduct or behaviour against others may be subject to disciplinary action. Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's DEI Policy and initiatives should seek assistance from a supervisor or a Human Resource representative.

VICOM reserves the right to modify, suspend, change or terminate this Policy at any time in accordance with local law. This Policy does not create any contractual rights or obligations, whether expressed or implied. Subject to local law, the English-language version will prevail.

ANNEX E: VICOM GROUP CODE OF BUSINESS CONDUCT

(A) OBJECTIVE

The Code of Business Conduct (the "Code") aims to give all employees of VICOM Limited, its subsidiaries and associated companies ("VICOM Group") a broad and clear understanding of the code of conduct and business ethics of them both locally and abroad.

The Code reflects our business principles and provides guidance on ethical conduct and integrity issues relating to the conduct of the VICOM Group's businesses. It is imperative that all employees understand its contents and comply strictly with it at all times.

The Code is not intended to be exhaustive in covering every issue or situation an employee may face, neither does it replace more detailed policies and guidelines. It is meant as a reference guide, in addition to other VICOM Group's policies and guidelines applicable to the employee's conduct.

(B) PERSONAL RESPONSIBILITY

It is the spirit and policy of the Code to prevent the occurrence of unethical or unlawful activities, to immediately stop any such activities that are detected and to discipline persons who engage in such activities.

All VICOM Group employees are responsible for the full understanding of and compliance with the Code. Depending on the severity, employees who knowingly violate any provisions of the Code will face disciplinary actions, including dismissal by the VICOM Group. Where local governmental or regulatory laws are breached, violators may be reported to the relevant authorities. In cases involving monetary or financial losses arising from fraudulent or unethical misconduct, VICOM Group will pursue the recovery of such losses at its liberty. Disciplinary actions will also be imposed for conduct that is considered unethical or improper even if the conduct is not specifically covered by the Code.

If an employee has a concern on the integrity of another employee's conduct or any business dealings or transactions in contravention of the Code, such employee has a duty to report to any of the following:

ComfortDelGro Corporation / VICOM Group
Group Internal Audit Officer at DID: +65 63837011
or by email at GClAO@comfortdelgro.com

All reports will be handled discreetly and every effort will be made to maintain confidentiality of the information provided, within the limits allowed by the law

(C) RESPONSIBILITY TO OUR CUSTOMERS

VICOM Group commits to providing products and services that meet or exceed our customers' expectations in terms of quality, reliability and value. All employees should anticipate our customers' needs and constantly upgrade their skills and knowledge to deliver outstanding value and quality services.

We will compete fairly, within permitted laws and with high ethical conducts and standards in all of our business dealings. Our credibility to our customers depends on our ability to fulfill our commitments, to earn their trust and to provide for their safety. We also aim to communicate clearly to our customers at all times.

(D) WORKPLACE

(i) Respect for the Individual and Diversity

VICOM Group is committed to providing a workplace that respects employees as unique individuals and supports the cultural and ethnic diversity of its workforce. We subscribe to creating a work environment that enables us to attract, retain and fully engage a diversity of talents.

We are also committed to providing a work place that treats each employee fairly and equitably regardless of gender, race or religion. We welcome employees' suggestions and participation to create a positive environment at the work place. We will respect all points of view, and will help and encourage all employees to develop their full potential.

VICOM Group will not tolerate undesirable behaviours such as discrimination, violence, intimidation or harassment, both sexual and racial harassment.

(ii) Teamwork and Cooperation

A spirit of teamwork and cooperation is actively promoted and encouraged within the VICOM Group. As individual employees, we bring together our skills, knowledge and experience to deliver the best results for our customers, business partners, suppliers, shareholders, the authorities and communities we operate in. Leveraging on our initiatives and creativity, VICOM Group will cohesively strive to build on our strengths and continue to grow and expand our businesses globally.

ANNEX E: VICOM GROUP CODE OF BUSINESS CONDUCT

(iii) Safety

Given the nature of our business, the safety of our employees and customers are of paramount importance. Regulations and procedures are put in place to guide proper safe work practices for the well-being of all employees and customers.

Employees are to observe and carry out safety rules and practices that apply to their jobs to ensure a safe work environment for everyone.

(E) BUSINESS ETHICS

(i) Conflicts of Interest

Employees should avoid situations that will put themselves in a position that will present an actual or a potential conflict between their personal interests and the interests of the VICOM Group. A conflict of interest occurs when an employee's personal interest interferes with that of VICOM Group.

Employees owe their loyalty to VICOM Group and are expected to act at all times to safeguard its best interest and to exercise sound judgment unclouded by personal interest or divided loyalties.

An employee of the VICOM Group must not take additional employment with other organisations or operate his/her own business/commercial activity if such employment or activity will create an actual or potential conflict of interest with that of VICOM Group. Prior written consent must be obtained from the manager, department head or human resource department, as appropriate, to engage in any such employment and/or business or commercial activities, whether such employment and/or activity is intermittent or continuing, and whether or not compensation is received. No prior approval is needed for volunteer work during personal time in a non-profit organisation.

When dealing with external parties (e.g. suppliers, vendors), employees who have relatives holding senior appointments in these companies, or working as project managers dealing directly with us, are to declare their interests to their immediate superiors and ensure that there is no conflict of interest. Where a possible conflict of interest arises, the employee should abstain from participating in the decision making process.

An employee of VICOM Group must not supervise directly a family member or related family member or anyone with whom the employee has a close personal relationship. An employee may not allow a friendship or any personal relationship with another employee to influence his/her judgment in work-related matters such as hiring, job assignments, appraisals, promotion and compensation decisions.

(ii) Integrity of Accounts

VICOM Group's financial, accounting and other reports and records should accurately and factually reflect the transactions and financial condition of the businesses in accordance with recognised accounting standards and principles. No payment may be requested, approved or made with the intention that any part of such payment is to be used for any purpose other than as described in the supporting documents.

Internal accounting and financial controls and disclosure controls are in place and must be followed strictly to ensure that financial and other reports are accurately and reliably prepared and fully and fairly disclosed. The financial accounts of the VICOM Group must be reconciled on a regular basis in accordance with the applicable accounting controls.

VICOM Group prohibits false or misleading entries in its books and/or records for any reason and will not condone any undisclosed or unrecorded bank accounts or assets established for any purpose.

Expenses incurred by employees in performing VICOM Group's business will be reimbursed through the filing of expense reports, which must be documented accurately and completely.

(iii) Gifts, Entertainment, Loans or Other Favours

Business gifts and entertainment are courtesies designed to build goodwill and sound working relationships among business partners. However, VICOM Group will not tolerate improper use of gifts or entertainment to gain any special advantage in a business relationship.

Receiving gifts in whatever form or accepting entertainment, loans or other favours may compromise an employee's ability to make objective, independent and fair business decisions.

Likewise, offering excessive gifts in whatever form or entertainment to others can be open to misinterpretation. Cash gifts must never be offered or received. In addition, an employee must never solicit a gift in whatever form or entertainment.

Business entertainment should be moderately scaled and intended only to facilitate achieving of business goals and objectives.

ANNEX E: VICOM GROUP CODE OF BUSINESS CONDUCT

Business gifts and entertainment presented on VICOM Group's behalf must be consistent with generally accepted business practices and ethical standards. They must not be misconstrued as bribes or kickbacks in any way and must not violate any applicable laws, regulations or policies of any country we operate in or company in which we have dealings with.

Employees who receive gifts, directly or indirectly in relation to their course of employment with VICOM Group, and which may violate the spirit or intention of the Code should promptly notify their supervisor and declare such gifts to their respective human resource departments.

(iv) **Fraud**

VICOM Group will not condone fraud in any form. This applies not only to the employees of VICOM Group but also to all vendors, customers and business partners to the extent that any of VICOM Group's resources are involved or affected.

In our context, fraud is defined as intentional deception, misappropriation of resources or manipulation of data to the advantage or disadvantage of a person or entity. These include:

- Altering or falsifying Company records
- Falsifying or doctoring financial results
- Falsifying expenses or invoices
- Failing to account for monies collected
- Knowingly provide false information on job applications or requests for funding

An employee has a duty to report any fraudulent activity of another employee, vendor or any other party associated within the VICOM Group to the persons named in the VICOM Group Alert Line as set out in the Code.

Such reports will be taken seriously and will be investigated accordingly. Where necessary, VICOM Group will notify and fully co-operate with the appropriate law enforcement agency in any investigations.

(v) **Bribery**

VICOM Group complies with all the laws of the jurisdictions in which it operates and conducts business in an open, transparent manner, and prohibits any employees from directly or indirectly offering, promising to pay, or authorising the payment of money or anything of value for the purpose of gaining perceived personal advantage for the VICOM Group. All employees are responsible for following VICOM Group's procedures, including audit controls, for carrying out and reporting business transactions.

(vi) **Undue Influence and Pressure**

All staff in their course of work should be free from undue influence and pressure which would compromise the integrity and quality of work. Given the business nature of VICOM Group, it is paramount that all inspection and test results should be in accordance to prevailing test standards and regulations. Staff should report any such undue influence and pressure from either internal or external parties to the next appropriate level of management.

(F) **CORPORATE ENVIRONMENT**

(i) **Corporate Social Responsibility**

Expanding our global footprint entails both a challenging and responsible role for our businesses. While we seek to grow from strength to strength, we are also committed to embrace the various diversities and support the sustainability and development of the local community that we operate in.

We strongly subscribe to our responsibility of doing our part for worthwhile causes such as education, the labour movement and the community at large. We will continue to show our support, care and concern for the disabled, the disadvantaged and the elderly in our society.

ANNEX E: VICOM GROUP CODE OF BUSINESS CONDUCT

(ii) Political Activities

VICOM Group is an independent business organisation, not affiliated to any political party and remains a neutral party to partisan politics in the countries it operates in.

Participation by an employee in the political process or activities is completely personal and voluntary. However, association with or participation in unlawful political activities will not be tolerated or when there is a conflict of interest with that of VICOM Group.

Political views expressed by employees are entirely personal and in no way associated with or attributed to VICOM Group.

(G) USE OF INFORMATION & ASSETS

(i) Handling Information

Information is a valuable corporate asset. Open and effective dissemination of information, subject to business confidentiality, is essential to our success. However, much information about VICOM Group's business activities may be confidential in nature.

Any information which is not common knowledge outside the VICOM Group or not released to the public is considered confidential. If an employee learns about VICOM Group information in the course of employment, care must be taken not to share it with others, including fellow colleagues, unless they need to know it for a legitimate business reason that will not violate any policy, law or regulation.

(ii) Trading On Inside Information

Using confidential material price sensitive information for trading securities or tipping others to trade is both unethical and illegal. Material price sensitive information is any information about a company that has not reached the general marketplace and is likely to be considered important by investors in deciding whether or not to buy or sell securities of that company. Care must be taken not to make such information available to others who might profit from it.

(iii) Computer Resources

VICOM Group takes a serious view of any illegal use of computer resources such as downloading or sending of copyrighted materials (e.g. computer software, music or movies).

Sending or downloading any information that could be insulting or offensive to another person, such as graphic, vulgar, violent, racially or sexually offensive materials or any other message that could be viewed as harassment will not be tolerated.

ANNEX F: SAFETY POLICY

In VICOM, we are committed to providing a safe and health risk-free workplace for all our employees and stakeholders. The management pledges that no employee will be asked to carry out any work, which can compromise his or her safety.

We resolve to provide the necessary support and resources for ensuring workplace risks are being eliminated or reduced to the lowest possible level by implementing reasonably practicable control measures, such that injury and ill-health are prevented. We believe that no work is so important that it cannot be done safely.

We are committed to complying with all relevant Occupational Safety and Health legislative and other requirements that the organization subscribes to. We strive for continual improvement in our safety & health management system and performance through setting & meeting of safety objectives and targets.

We promote open sharing of information and we encourage all employees to provide feedback or to report any dangers or hazards, which can undermine the safety of any person at the workplace.

The responsibility for occupational safety & health ultimately rests upon the Accountable Manager. However, each Director, manager, and Head of Department has their respective responsibility in implementing the safety & health management system in areas where he or she is. Every individual in VICOM has the responsibility to participate and contribute towards safety. We shall provide the necessary provisions so that every individual employee can be adequately trained and informed of the safety requirement. This policy may be made available to anyone, who may request for it in writing.

This policy shall be reviewed on a regular basis to ensure its suitability and effectiveness and it serves to describe our philosophy and management approach towards managing workplace safety and risks appropriately. All VICOM staff shall read, embrace and commit to our Safety & Health Management System.

ANNEX G: DATA PROTECTION POLICY

VICOM strives to comply with the regulatory requirements of the Personal Data Protection Act (PDPA) and requirements for Data Protection Trust Mark (DPTM) certification and henceforth has established the following policies in its effort to fulfil the 10 (ten) obligations of PDPA as follows:

5.1 CONSENT OBLIGATION

VICOM shall seek the prior written consent of an individual in its collection of personal data and such consent shall be documented. Despite given their consent, the individual is allowed to change their mind and withdraw their consent at any time.

5.2 PURPOSE LIMITATION OBLIGATION

VICOM shall explicitly state its purpose of collecting personal data and such purpose shall be considered appropriate by a reasonable person who provides the personal data.

5.3 NOTIFICATION OBLIGATION

VICOM shall notify the individual of the purpose/s for which it intends to collect, use or disclose the individual's personal data on or before such collection, use or disclosure of the personal data.

5.4 ACCESS AND CORRECTION OBLIGATION

VICOM shall provide reasonable access to individual whose personal data it possesses or under its control for the latter to verify and make corrections should there be any amendments / update required.

5.5 ACCURACY OBLIGATION

VICOM shall make a reasonable effort to ensure that the personal data collected is accurate and complete for the purpose of its collection. It shall provide suitable way for an individual to access their record and make the necessary amendment/update on it.

5.6 PROTECTION OBLIGATION

VICOM shall strive to protect personal data in its possession or under its control by establishing suitable and reasonable security arrangement to prevent undesirable incidents eg unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

5.7 RETENTION LIMITATION OBLIGATION

VICOM shall determine the appropriate retention period/s of all documents (including electronic storage) and shall dispose, delete or remove appropriately such documents when it reaches its retention time limit or when such retention no longer serve the purpose for its collection or when such retention is no longer necessary for legal or business purposes.

5.8 TRANSFER LIMITATION OBLIGATION

VICOM does transfer personal data to overseas 3rd party scheme owner in United Kingdom (UK). However, such personal data transfer is in the form of a prescribed format from the latter. The type and number of information collected from individuals are based on requirements set by the scheme owner.

5.9 DATA BREACH NOTIFICATION OBLIGATION

VICOM shall establish a robust data breach management plan in order to manage and respond to data breaches more effectively. In the event of a data breach, VICOM shall notify (where required) the PDPC, affected individuals and/or scheme owners should the breach likely result in significant harm or impact to individuals or of a significant scale.

5.10 ACCOUNTABILITY OBLIGATION

VICOM shall establish and make publicly known its policies and practices in meeting the requirements of PDPA. It shall identify the Data Protection Officer (DPO) to whom the public or relevant individuals are able to provide feedback and comments on our policies and practices.

ANNEX H: ENVIRONMENTAL POLICY

VICOM is committed to sustainable growth, based on our principles of integrity, quality, safety, and social and environmental responsibility. VICOM strives to conduct its business activities in an environmentally sound manner and has established policies, programmes and practices to reduce risks posed to the environment and the organisation.

The Management and Staff of VICOM are committed to the effective implementation of the established environmental management system and will:

- Comply with and fulfil all applicable environmental legislation and sustainability commitments expected of a responsible corporate citizen respectively.
- Develop and maintain environmental management programs with objectives and targets to minimize adverse environmental impacts.
- Implement effective pollution prevention and waste minimization programs to reduce, reuse, and recycle materials, supporting a circular economy.
- Ensure that energy and water are used efficiently, responsibly and conserved through innovative, resource-saving practices and procedures.
- Continually improve its environmental performance and reduce its environmental impact by taking into account the commitment of suppliers, current best practices, technological advances, customer and community needs, while educating and training employees to work in an environmentally responsible manner.

ANNEX I: OTHER CORPORATE POLICIES

CORPORATE SOCIAL RESPONSIBILITY POLICY

VICOM strives to contribute to sustainable development of society and the environment through our business activities, with compliance to all legislative requirements and providing professional services backed by honesty and integrity. Our corporate social responsibility practices include promoting health and workplace safety, reaching out to the less fortunate, supporting environmental conservation efforts, and contributing to our social and business community.

QUALITY POLICY

It is the policy of VICOM to provide clients with professional testing, inspection, calibration, certification and consultancy services as well as training programmes that meet their requirements and are backed by unconditional integrity.

Client satisfaction is essential to the continual success and competitiveness of the Company and is therefore a primary objective that requires proper and continuous planning and control of VICOM's policies and philosophies in management, quality, business and operating practices.

HUMAN RESOURCE POLICY

VICOM believes that the true strength of the company lies in its people. Through strong emphasis on the selection and development of our people, we enable them to make meaningful and significant contributions to the company.

ENERGY POLICY

VICOM is committed to sustainable growth, based on our principles of integrity, quality, safety, social and environmental responsibility. Our goal is to produce the best quality service with the least consumption of energy while increasing the value of our service.