

# APPENDICES





# APPENDIX 1: GRI INDEX

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## APPENDIX 2: SASB: PROFESSIONAL & COMMERCIAL SERVICES

**Table 1. Sustainability Disclosure Topics & Accounting Metrics**

TOPIC	ACCOUNTING METRIC	CATEGORY	UNIT OF MEASURE	SASB CODE	PAGE REFERENCE
<b>Data Security</b>	Description of approach to identifying and addressing data security risks	Discussion and Analysis	N/A	SV-PS-230a.1	86–87
	Description of policies and practices relating to collection, usage, and retention of customer information	Discussion and Analysis	N/A	SV-PS-230a.2	86–87, 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	87
<b>Workforce Diversity &amp; Engagement</b>	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	Quantitative	Percentage (%)	SV-PS-330a.1	64
	(1) Voluntary and (2) involuntary turnover rate for employees	Quantitative	Rate	SV-PS-330a.2	60
	Employee engagement as a percentage	Quantitative	Percentage (%)	SV-PS-330a.3	64
<b>Professional Integrity</b>	Description of approach to ensuring professional integrity	Discussion and Analysis	N/A	SV-PS-510a.1	85
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	Quantitative	Reporting currency	SV-PS-510a.2	85

**Table 2. Activity Metrics**

ACTIVITY METRIC	CATEGORY	UNIT OF MEASURE	SASB CODE	PAGE REFERENCE
<b>Number of employees by: (1) full-time and part-time, (2) temporary, and (3) contract</b>	Quantitative	Number	SV-PS-000.A	61–62
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## APPENDIX 3: UNGC INDEX

PRINCIPLE	DESCRIPTION	PAGE REFERENCE
<b>Human Rights</b>		
<b>Principle 1</b>	Businesses should support and respect the protection of internationally proclaimed human rights; and	68, Human Rights Policy
<b>Principle 2</b>	Make sure that they are not complicit in human rights abuses	68, Human Rights Policy
<b>Labour</b>		
<b>Principle 3</b>	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	59, Human Rights Policy
<b>Principle 4</b>	the elimination of all forms of forced and compulsory labour;	Human Rights Policy
<b>Principle 5</b>	the effective abolition of child labour; and	Human Rights Policy
<b>Principle 6</b>	the elimination of discrimination in respect of employment and occupation	Human Rights Policy
<b>Environment</b>		
<b>Principle 7</b>	Businesses should support a precautionary approach to environmental challenges	68
<b>Principle 8</b>	undertake initiatives to promote greater environmental responsibility; and	Driving Environmental Stewardship and Enabling the Transition Towards Sustainability section
<b>Principle 9</b>	encourage the development and diffusion of environmentally friendly technologies	Driving Environmental Stewardship and Enabling the Transition Towards Sustainability section; 89
<b>Anti-corruption</b>		
<b>Principle 10</b>	Businesses should work against corruption in all its forms, including extortion and bribery	71–82, 85, Human Rights Policy

# APPENDIX 4: PERFORMANCE DATA

## Breakdown of Scope 3 Emissions by Categories

CATEGORY	2019 EMISSIONS (tCO <sub>2</sub> e) (BASELINE) <sup>46</sup>	2021 EMISSIONS (tCO <sub>2</sub> e)	2022 EMISSIONS (tCO <sub>2</sub> e)	2023 EMISSIONS (tCO <sub>2</sub> e)	2024 EMISSIONS (tCO <sub>2</sub> e)
Category 1: Purchased goods & services	–	3,145.30	2,352.10	2,471.96	1,415
Category 2: Capital goods	–	1,097.88	1,204.22	2,327.78	1,397
Category 3: Fuel and energy used not captured in Scope 1 and Scope 2	–	912.56	1,582.91	720.25	677
Category 4: Upstream transportation and distribution	–	–	–	361.27	212
Category 5: Waste Generated in Operations	–	15.39	5.01	8.79	5
Category 6: Business travel	–	11.50	34.08	68.71	61
Category 7: Employee commute	–	1,279.72	1,281.68	1,389.33	105
Category 8: Upstream transportation and distribution	–	65.18	97.11	–	–
Category 12: End-of-life treatment of sold products	–	3.30	7.15	8.71	6
Category 13: Downstream Leased Assets	–	839.00	742	261.93	264
Category 15: Investments	–	66.72	66.72	503.42	217
Total	–	7,436.54	7,373.28	8,122.14	4,357

46 VICOM only started calculating its Scope 3 GHG emissions in 2021.



## APPENDIX 4: PERFORMANCE DATA

### Talent Attraction, Retention & Job Opportunity Creation

NEW HIRES AND TURNOVER	FY2019			FY2021		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
Number of New employee hires	94	37	<b>131</b>	134	58	<b>192</b>
Rate of New Employee Hires (%)	10.8	4.3	<b>15.1</b>	16.2	7.0	<b>23.2</b>
Number of Employee Turnover	110	38	<b>148</b>	142	49	<b>191</b>
Employee Turnover Rate (%)	12.7	4.4	<b>17.1</b>	17.1	5.9	<b>23.0</b>

### Employee Training, Upskilling & Development

TRAINING AND APPRAISAL	FY2019			FY2021		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
Total number of employees by gender	664	203	<b>867</b>	616	213	<b>829</b>
Total number of training hours provided to employees	7,082	374	<b>7,456</b>	9,355	1,535.5	<b>10,890.5</b>
Number of employees receiving regular performance and career development reviews	664	240	<b>867</b>	616	213	<b>829</b>
Total number of temp/contract employees by gender	3	2	<b>5</b>	5	6	<b>11</b>
Total number of training hours provided to temp/contract employees	9	0	<b>9</b>	3	0	<b>3</b>
Average number of training hours per employee	10.67	1.84	<b>8.60</b>	15.19	7.21	<b>13.14</b>

APPENDIX 4:  
PERFORMANCE DATA

FY2022			FY2023			FY2024		
MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
185	45	230	138	46	184	113	42	155
21.4	5.2	26.6	15.3	5.1	20.4	15.4	18.6	16.8
136	57	193	108	36	144	86	35	121
15.7	6.6	22.3	16.0	17.1	16.3	12.3	16.2	13.2

FY2022			FY2023			FY2024		
MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
659	207	866	717	221	938	706	218	924
9,130	1,121	10,251	13,266	4,729	17,995	12,949	5,658	18,607
659	207	866	717	221	938	706	218	924
12	8	20	5	2	7	8	3	11
13	111.5	125	141	109	250	144	139.3	283.3
13.85	5.41	11.84	18.50	21.40	19.18	18.34	26	20.14

# 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

ComfortDelGro Corporation Limited and its subsidiaries ("ComfortDelGro") is committed to the highest standards of ethical conduct, integrity, social responsibility and environmental sustainability.

ComfortDelGro 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").

ComfortDelGro aims to deliver superior services to its customers and society as a whole, in collaboration with its Suppliers. To achieve this goal, ComfortDelGro requires its Suppliers to operate in accordance with this Supplier Code of Conduct ("Code") and in full compliance with all applicable laws and regulations, maintain high ethical standards, have clear health and safety policies and strict environmental policies, and adopt fair employment practices.

Suppliers are responsible for ensuring that their employees, representatives, contractors and other business partners understand, comply and act consistently with this Code. This Code sets out ComfortDelGro's minimum expectations of its Suppliers, and their supply chain. Failure to comply with this Code may result in disqualification from consideration for business, and/or future business, with ComfortDelGro.

## 1. COMPLIANCE WITH LAWS

Suppliers' business operations, as well as all goods and services supplied to ComfortDelGro, 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 ComfortDelGro.

## 2. BUSINESS PRACTICES AND ETHICS

### 2.1. Use of Fair Business Practices

Suppliers must practise fair competition in accordance with local antitrust and competition laws. Suppliers must not engage in any acts of collusion, price fixing, predatory pricing or other anti-competitive practices. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independently and without communication with competitors.

### 2.2. Anti-Corruption

Suppliers must conduct their business with integrity, transparency and honesty. ComfortDelGro 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 ComfortDelGro. 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.

### 2.3. Anti-Fraud

Likewise, ComfortDelGro 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 ComfortDelGro.

### 2.4. Tax Evasion

ComfortDelGro holds itself and its Suppliers to the highest ethical standards. We strictly prohibit any form of facilitation of tax evasion. We expect our Suppliers to comply with all applicable laws, regulations, codes, and sanctions relating to the prevention of tax evasion. Under no circumstances shall any Supplier or person associated with the Supplier's business knowingly become involved with, or take steps with a view to, assisting another person to fraudulently evade tax.

### 2.5. Gifts and Entertainment

ComfortDelGro is committed to conducting all businesses without undue influence. The Code requires Suppliers 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 ComfortDelGro employee that is intended as, or may be viewed as an attempt to improperly influence business decisions.

Suppliers must 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 ComfortDelGro or any person or organisation with whom ComfortDelGro may have business dealings.

### 2.6. Conflicts of Interest

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

# ANNEX C: SUPPLIER CODE OF CONDUCT

## 2.7. Social Media

ComfortDelGro expects all Suppliers to use social media platforms in a responsible and professional manner that aligns with ethical standards and promotes positive engagement.

Suppliers shall take measures to protect the reputation and brand image of ComfortDelGro when engaging in social media activities and refrain from making false or misleading statements, defamatory comments, or engaging in any activity that may harm the reputation of ComfortDelGro or its stakeholders.

## 2.8. Record Keeping and Documentation

ComfortDelGro recognises the utmost importance of comprehensive and accurate record-keeping. Suppliers are expected to maintain true and accurate records of all financial transactions and information regarding their business in accordance with applicable laws, policies and procedures.

## 3. HUMAN AND LABOUR RIGHTS

### 3.1. Human Rights

ComfortDelGro believes that it is our responsibility to respect the human rights of the people in all the locations that we operate in. ComfortDelGro's Human Rights Commitment is guided by the Universal Declaration of Human Rights, the United Nations' Global Compact's Principles on Human Rights in aspects of our employment practices as well as Workplace Health and Safety. ComfortDelGro's Human Rights Policy is available [here](#).

Suppliers must uphold and comply with the highest international standards on human and labour rights protection.

### 3.2. Modern Slavery

ComfortDelGro has a zero-tolerance approach to modern slavery and is committed to implementing and enforcing effective systems and controls to comply with its commitments under modern slavery laws. Suppliers must implement measures to ensure there is no form of modern slavery, including forced labour, human trafficking, debt bondage, and child labour, within their operations and supply chains.

Suppliers shall comply with all applicable laws, regulations and international standards concerning modern slavery and/or human trafficking.

### 3.3. 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 exploitation or abuse, verbal intimidation, psychological harassment, coercion and corporal punishments are not tolerated.

Suppliers shall educate their employees on the types of behaviour that constitute harassment and abuse, the consequences of such behaviour and the channels available to report such incident.

### 3.4. Non-Discrimination

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 or health status of workers, culture, sexual orientation, gender identity, or other characteristics protected by applicable laws and regulations.

### 3.5. Ethical Employment

ComfortDelGro firmly believes in treating employees with dignity, respect and fairness. Suppliers must align their employment practices with all applicable laws, regulations and standards concerning recruitment and employment practices. This includes laws related to minimum wage, minimum age, working hours, providing proper living conditions to their employees and providing written employment contracts that clearly outline the terms and conditions of employment.

Suppliers shall ensure that their employees receive fair wages and benefits in accordance with local laws and industry standards. This includes payment of at least the minimum wage, timely and accurate payment of wages, and adhering to regulations regarding overtime and benefits.

Suppliers shall establish working hours that comply with local laws and regulations. Suppliers' employees should not be compelled to work excessive overtime, and they must be provided with rest periods and days off as required by law.

Supplier shall follow good recruitment practices such as establishing written contracts of employment, no charging of recruitment fees and no deposit requirement for migrant workers.

# ANNEX C: SUPPLIER CODE OF CONDUCT

## 3.6. Freedom of Association and Collective Bargaining

Suppliers shall recognise and respect their employees' freedom of association, including the right to join trade unions or employee associations of their choice. Suppliers shall not interfere with their employees' rights to collectively bargain or engage in peaceful assembly.

## 3.7. Freedom of Movement and Personal Freedom

Suppliers shall not unreasonably restrict the freedom of movement of their employees. Suppliers shall not use any coercive means to restrict the freedom of movement or personal freedom of their employees.

## 4. WORKPLACE HEALTH, SAFETY AND QUALITY

### 4.1. Healthy and Safe Working Environment

At ComfortDelGro, we recognise that a healthy and safe work environment is built upon a foundation of knowledge, awareness and continuous improvement. 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 prevent work-related accidents, injuries and occupational illnesses. For example, protective equipment and tools must be provided and replaced/maintained regularly.

Suppliers shall ensure that their employees are provided with health and safety trainings based on their roles and responsibilities. This includes training on safe work practices, proper use of equipment, emergency responses, hazard identification and regular refresher courses to keep their employees updated on the latest best practices and regulatory requirements.

### 4.2. Safety

The safety of all goods and services supplied must be ensured through appropriate policies, implementation and monitoring. Suppliers must ensure that their goods and services meet all necessary safety standards and regulations. The goods must be free from defects that could pose a risk to health or safety, and they must be designed, manufactured, labelled, and packaged in a manner that minimises potential hazards.

### 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 ComfortDelGro. Suppliers shall put in place robust quality assurance and control processes to ensure the consistency, reliability, and performance of their goods and services. This includes implementing quality management systems, conducting regular inspections and testing, and implementing corrective and preventive actions to address any identified issues.

## 5. CORPORATE SOCIAL RESPONSIBILITY AND ENVIRONMENTAL MANAGEMENT

### 5.1. Corporate Social Responsibility

ComfortDelGro 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 the area of Corporate Social Responsibility.

### 5.2. Environmental Management

Suppliers must endeavour to minimise the impact of their operations on the environment, and are encouraged to adopt effective environmental management practices and standards. This includes striving for the responsible and efficient consumption of resources, avoidance of deforestation, and avoidance of biodiversity loss. ComfortDelGro's Biodiversity Policy is available here. 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 their greenhouse gas emissions from their operations. This includes adoption of eco-efficient practices and green technologies and transitioning to cleaner energy.

## 6. USE OF INFORMATION

### 6.1. Insider Trading

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

### 6.2. Proprietary Information

Any information used by Suppliers in their business relationship with ComfortDelGro 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 their obligations to ComfortDelGro must first be authorised by ComfortDelGro.

# ANNEX C: SUPPLIER CODE OF CONDUCT

## 6.3. Personal Data

Suppliers 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 ComfortDelGro only for the purpose(s) for which the relevant personal data is disclosed or collected.

## 7. COMMUNICATION

Suppliers shall ensure adequate communication to and compliance of this Code by their employees and supply chain. Where needed, Suppliers shall ensure appropriate 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 them 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 their facilities and operations, and to extend such checks to their supply chain. It is the Suppliers' responsibility and obligation to inform ComfortDelGro in a timely manner of any alleged, threatened or actual breach of this Code.

### 8.2. Corrective Action Process

ComfortDelGro will, where appropriate, work with Suppliers to ensure they achieve an improved performance in each of the areas outlined in this Code. Suppliers are expected to self-assess their compliance with the Code and take timely action to address any non-compliance. A corrective action plan should be developed and promptly implemented to address the identified non-compliance and prevent reoccurrence. Suppliers shall monitor and evaluate the effectiveness of the corrective actions over time and make necessary adjustments or implement additional actions, if required, to prevent future reoccurrences.

### 8.3. Due Diligence

ComfortDelGro reserves the right to conduct due diligence checks and audits on Suppliers for compliance with this Code. Suppliers may be required to provide relevant policies and procedures, access to employees and other personnel, as well as associated evidence, to demonstrate compliance.

## 9. REPORTING

### 9.1. Protection of Identity and Non-Retaliation

ComfortDelGro does not tolerate any retaliation or retribution for reporting any ethical concerns, under this Code or otherwise and expects the same of its Suppliers. Accordingly, Suppliers are expected to implement effective reporting mechanisms that ensure confidentiality and prohibit retaliation.

### 9.2. ComfortDelGro Alert Line

Suppliers are encouraged to raise any grievances or report any actual or suspected violations of the Code:

- (a) -via the ComfortDelGro Alert Line listed in the ComfortDelGro Whistle Blowing Policy available at <https://www.comfordelgro.com/whistle-blowing-policy-for-countries-other-than-Australia>;
- (b) via the whistleblower hotline listed in the ComfortDelGro Corporation Australia Whistleblower Policy available at <https://comfordelgro.com.au/whistleblower-policy-for-Australia>.

## 10. FURTHER INFORMATION

For questions or concerns about this Code, please contact the ComfortDelGro Procurement representative in your respective country.



## 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 [GCIAO@comfortdelgro.com](mailto:GCIAO@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.

### (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.

# ANNEX E: VICOM GROUP CODE OF BUSINESS CONDUCT

## (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.

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.

# ANNEX E: VICOM GROUP CODE OF BUSINESS CONDUCT

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.

### (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 POLICIES

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.

The Laboratory Management is committed to:

- Provide prompt, impartial and reliable laboratory services to meet, and where possible to exceed, its customer's expectations.
- Good professional practice and to provide reproducible test results consistently to the customers by analyzing & assuring validity of test results regularly.
- Development and implementation of Laboratory Management System in line with the requirements of ISO/IEC 17025 (latest edition) and to continually improve its effectiveness through regular review.
- Consistently comply with ISO/IEC 17025 (latest edition), Singapore Accreditation Council (SAC) policies, regulatory and safety requirements to ensure quality testing services by Identifying risks and opportunities relevant to internal & external issues of the testing laboratories and ensure significant efforts for prevention or elimination or mitigation of the risks.
- Ensure that all laboratory personnel are familiarized themselves with the laboratory management system / quality documentation, Policies, Objectives, etc through reading / training and to implement the policies and procedures in their work continuously.
- Guarantee the availability of highly qualified personnel for the performance of the duties assigned and improve the technical competence of the same through training.
- Effectively control all the processes, with special emphasis on relations with customers, giving priority to the guarantee of confidentiality, satisfaction and the management of complaints and claims
- Ensure all testing activities are always carried out in accordance with relevant National/International standards, legal requirements and/or customer's requirements.

## 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

### Purpose

VICOM strives to use energy in the most efficient, cost effective, and environmentally responsible manner possible. The purpose of this policy is to optimize energy use throughout VICOM, improve cost-effectiveness and productivity, enhance working conditions, reduce greenhouse gas emissions, contribute to sustainability and otherwise reduce waste associated with energy use.

### Responsibility

All employees as well as on-site Contractors/Suppliers working on our behalf have a role to play in conserving energy. We are all responsible to efficiently use energy which is under their direct control. All employees have energy related responsibilities as outlined below. VICOM will promote the efficient use of energy in delivering professional services to our customers.

We are committed to responsible energy use and will practice energy efficiency in all facilities and processes, wherever it is cost effective. To implement this policy, we will:

- Achieve and maintain compliance with applicable legal and other requirements.
- Continuously improve energy efficiency by establishing and implementing strategic energy management practices that support service capabilities while providing a safe and comfortable work environment.
- Consider energy efficiency as a factor in service development and in process and facility design and in the procurement of goods and services.
- Procure adequate and dependable energy supplies at the most advantageous rate and implement appropriate risk contingency plans to protect operations from supply interruptions.
- Encourage continuous improvement in energy conservation by employees.
- Use energy consumption data to establish Key Performance Indicators (KPIs) to drive performance improvements. We will measure, review and communicate our progress on a regular basis to ensure availability of information to our employees.
- Ensure adequate resources are available to work towards achieving KPI goals.



# ANNEX I: OTHER CORPORATE POLICIES

## INVESTOR RELATIONS POLICY

VICOM Ltd ("VICOM" or the "Company") is committed to engaging its shareholders and the investment community through regular, effective and fair communications, in compliance at all times with the requirements for disclosure of information under applicable laws including the Listing Rules of the Singapore Exchange Securities Trading Limited ("SGX-ST").

The Investor Relations ("IR") function of the Company is performed by the IR team of its parent company ComfortDelGro Corporation Limited ("CDG") led by the CDG Head, Group Investor Relations ("GHIR").

The GHIR and his team serve as an intermediary between the Company and its shareholders and the investment community. Through effective information disclosure and dialogue, the Company aims to further enhance its corporate transparency and maintain the trust of its stakeholders.

### 1. POLICY PRINCIPLES

- 1.1 The Company's IR Policy outlines the principles and framework for the Company to provide investors, analysts and other IR stakeholders with balanced, clear and pertinent information on matters pertaining to and/or affecting the Company and its subsidiaries (collectively, the "Group").
- 1.2 In the conduct of its IR activities, the Company will comply with all applicable securities laws and regulations.
- 1.3 All material information relating to the Group will be disclosed by the Company in an accurate and timely manner through SGXNET. All disclosures submitted to SGX-ST through SGXNET shall also be made available on the Company's website ([www.vicom.com.sg](http://www.vicom.com.sg)).
- 1.4 Should there be any inadvertent disclosure of material information to a select group, the Company shall ensure that the same information is disclosed publicly to all shareholders as promptly as possible, through SGXNET and on the Company's website.

### 2. COMMUNICATIONS PRINCIPLES

- 2.1 The Company will communicate through the CDG Group Chief Corporate Affairs Officer, GHIR or any designated senior spokespersons who will establish and maintain regular dialogue with shareholders to solicit and understand their views, as well as respond to queries from members of the investment community or media.

- 2.2 The Company does not respond to rumours or market speculation. However, if rumours indicate that material information may have been leaked or where there are unusual market or trading activities that could be attributable to such rumours or market speculation, clarifications will be made promptly through announcements via SGXNET.

- 2.3 The Company will provide reasonable access to analysts and the media to enable them to formulate informed opinions of the Company and its developments but will not seek to influence those opinions.

- 2.4 From the end of each financial quarter until the announcement of the respective period's business updates or financial results (as applicable), the Company does not comment on industry outlook nor on the Group's business performance and financial results. This applies to quarterly business update announcements, as well as half-year and full-year results announcements.

### 3. COMMUNICATIONS WITH SHAREHOLDERS AND INVESTMENT COMMUNITY

- 3.1 The Company is committed to treat all shareholders fairly and equitably, and engage with shareholders and the investment community through various platforms including (where appropriate):
  - (i) The Company's general meetings, namely the Annual General Meeting ("AGM") and as and when necessary, Extraordinary General Meeting ("EGM");
  - (ii) Media briefings and analysts' briefings;
  - (iii) Announcements via SGXNET in compliance with the SGX-ST Listing Rules;
  - (iv) Investors' meetings, roadshows and conferences;
  - (v) Annual reports and sustainability reports;
  - (vi) Media releases and statements; and
  - (vii) Corporate website ([www.vicom.com.sg](http://www.vicom.com.sg))

### 4. SHAREHOLDERS' MEETINGS

- 4.1 The Company's general meetings, especially the AGMs, are the principal communication platforms provided for shareholders to give them the opportunity to communicate their views and concerns, if any, on the Company directly to the Board of Directors and the Company's senior management. The Company encourages shareholders to participate constructively at these meetings.

# ANNEX I: OTHER CORPORATE POLICIES

- 4.2 All shareholders will be sent a copy of the notice of AGM/EGM, which lists all items of business to be transacted at the general meeting, within the required notice period prior to the AGM/EGM.

Shareholders will be informed of the rules, including voting procedures, that govern these general meetings.

- 4.3 The notices of AGM/EGM will also be announced via SGXNET, the Singapore Business Times and the corporate website.
- 4.4 All members of the Board, the Company's key management personnel and the external auditors of the Company will endeavour to be in attendance at general meetings to address shareholders' queries.
- 4.5 All shareholders are entitled to attend and vote at general meetings in person or by proxy.

Shareholders can appoint proxies to attend, speak and vote at general meetings in their absence:

- Shareholders who are not relevant intermediaries may appoint not more than two proxies.
- Shareholders who are relevant intermediaries may appoint more than two proxies.

- 4.6 Shareholders may also lodge questions in advance of the general meetings relating to the businesses of the general meeting. The Company will endeavour to address all substantial and relevant questions in accordance with the timelines stipulated by SGX.

- 4.7 Since the COVID-19 pandemic, the Company has been taking every opportunity to make use of digital means to communicate with shareholders and hold hybrid meetings for its shareholders, with real-time communication and real-time live voting. Wherever appropriate, we will conduct hybrid general meetings or hold meetings in such form as may be directed by the Authorities.

- 4.8 As part of the Company's sustainability efforts and to ensure more efficient engagement, the Company encourages all shareholders to give their express consent to receive communications to shareholders, including statutory notices for general meetings and other circulars, via email and digital platforms.

- 4.9 Detailed results of the votes cast for and against each resolution and the names of the independent scrutineers for each general meeting will be presented at the general meeting and announced via SGXNET on the same day of the meeting. The minutes of these meetings, which will include substantial and relevant comments or queries from shareholders relating to the agenda of the meeting and responses from the Board, Management and the external auditors, will be made available via SGXNET and on the Company's website within a reasonable time after the conclusion of the relevant meeting.

## 5. COMPANY CONTACTS

- 5.1 Shareholders can contact the Company's Share Registrar as follows:

SHARE REGISTRAR  
B.A.C.S. Private Limited  
77 Robinson Road  
#06-03 Robinson 77  
Singapore 068896  
Direct: (65) 6593 4848  
Email: [main@zicoholdings.com](mailto:main@zicoholdings.com)

- 5.2 Shareholders and the investment community can contact the Company's IR team as follows:

Head, Group Investor Relations  
205 Braddell Road  
Singapore 579701  
Direct: (65) 6383 7076  
Facsimile: (65) 6282 9526  
Email: [ir@vicom.com.sg](mailto:ir@vicom.com.sg)

## **VICOM Ltd**

385 Sin Ming Drive  
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Mainline (65) 6458 4555  
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