

# APPENDICES AND ANNEXES



# APPENDIX 1: GRI INDEX

## GENERAL DISCLOSURES

GRI Standard	Disclosure	Page Number or Reference
<b>GRI 101: Foundation 2016</b>		
<b>Organisational Profile</b>		
102-1	Name of the organisation	About this Report
102-2	Activities, brands, products & services	14
102-3	Location of headquarters	Singapore
102-4	Location of operations	32, 76
102-5	Ownership and legal form	About this Report
102-6	Markets served	32, 76
102-7	Scale of the organisation	10, 14, Annual Report
102-8	Information on employees and other workers	53
102-9	Supply chain	66
102-10	Significant changes to the organisation and its supply chain	No significant changes
102-11	Precautionary Principle or approach	23
102-12	External initiatives	59 - 60
102-13	Membership of associations	77
<b>Strategy</b>		
102-14	Statement from senior decision maker	2 - 4
<b>Ethics and Integrity</b>		
102-16	Values, principles, standards, and norms of behaviour	14 Annual Report pg 1
<b>Governance</b>		
102-18	Governance structure	23
102-19	Delegating authority	23
102-20	Executive-level responsibility for economic, environmental, and social topics	23
102-26	Role of highest governance body in setting purpose, values and strategy	14
<b>Stakeholder Engagement</b>		
102-40	List of stakeholder groups	21 - 22
102-41	Collective bargaining agreements	51
102-42	Identifying and selecting stakeholders	21 - 22
102-43	Approach to stakeholder engagement	21 - 22
102-44	Key topics and concerns raised	21 - 22
<b>Reporting Practice</b>		
102-45	Entities included in the consolidated financial statements	Annual Report, pg 10 - 11, 18 - 20
102-46	Defining report content and topic boundaries	About this Report, 15
102-47	List of material topics	16
102-48	Restatements of information	pg 7, Restatement of past years' environmental data (i.e. emissions, fuel and electricity consumption) in include China's operations. This ensures a fair comparison of our environmental performance over time. Emission intensity for 2020 is also recalculated with restated revenue.
102-49	Changes in reporting	15, inclusion of China operations
102-50	Reporting period	About this Report

## APPENDIX 1: GRI INDEX

<b>MATERIAL TOPICS</b>		<b>Page Number or Reference</b>
<b>GRI Standard</b>		
<b>Reporting Practice (cont'd)</b>		
102-51	102-51	About this Report
102-52	Reporting cycle	About this Report
102-53	Contact point for questions regarding the report	About this Report
102-54	Claims of reporting in accordance with the GRI standards	About this Report
102-55	GRI content index	68 - 70
102-56	External assurance	About this Report
<b>Economic Growth</b>		
103*	Management approach	10
201-1	Direct economic value generated and distributed	10
<b>Energy and Fuels</b>		
103*	Management approach	36
302-1	Energy consumption within the organization	38
302-3	Energy intensity	38
302-4	Reduction of energy consumption	38
<b>Emissions and Air Quality</b>		
103*	Management approach	34
305-1	Direct GHG emissions (Scope 1)	35
305-2	Energy indirect GHG emissions (Scope 2)	35
305-3	Other indirect GHG emissions (Scope 3)	35
305-4	GHG emissions intensity	35
305-7	Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	36
<b>Resource Stewardship</b>		
103*	Management approach	41
303-1	Interactions with water as a shared resource	41
303-3	Water withdrawal	42
303-5	Water consumption	42
103*	Management approach	39
306-2	Waste by type and disposal method	40
<b>Health and Safety</b>		
103*	Management approach	46 - 47
403-1	Occupational Health and Safety Management system	46 - 47
403-2	Hazard identification, risk assessment & incident investigation	46 - 47
403-3	Occupational health services	46 - 47
403-5	Worker training on Occupational Health and Safety	46
403-6	Promotion of worker health	46 - 47
403-9	Work-related injuries	48

## APPENDIX 1: GRI INDEX

MATERIAL TOPICS		
GRI Standard	Disclosure	Page Number or Reference
<b>Our People</b>		
103*	Management approach	51 - 52
401-1	New employee hired and employee turnover	78 - 79
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	54
103*	Management approach	54
404-1	Average hours of training per year per employee	54
404-3	Percentage of employees receiving regular performance and career development reviews	54
103*	Management approach	52
405-1	Diversity of governing bodies	53
406-1	Non-discrimination policies	82
407-1	Freedom of association and collective bargaining	80, 82
408-1	Child labour	80, 82
409-1	Forced or compulsory labour	80, 82
103*	Management approach	51
412-1	Operations that have been subject to human rights reviews or impact assessments	80
<b>Our Patrons and Communities</b>		
103*	Management approach	59
413-1	Operations with local community engagement, impact assessments, and development programmes	59 - 60
<b>Ethical Business and Operational Integrity</b>		
103*	Management approach	63 - 64
205-2	Communication and training about anti-corruption policies and procedures	63 - 64
205-3	Confirmed incidents of corruption and actions taken	64
307-1	Non-compliance with environmental laws and regulations	20
419-1	Non-compliance with laws and regulations in the social and economic area	20
<b>Cybersecurity, Data Privacy and Innovation</b>		
103*	Management approach	64 - 65
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	20
<b>Supply Chain Management</b>		
103*	Management approach	66
308-2	Negative environmental impacts in the supply chain and actions taken	66
414-2	Negative social impacts in the supply chain and actions taken	66

\* Comprises GRI 103-1, GRI 103-2 and GRI 103-3 (explanation of the material topic and its boundaries, components, and evaluation of the management approach)

## APPENDIX 2: SASB INDEX

### Road Transportation - Sustainability Accounting Standard

TOPIC	ACCOUNTING METRIC	SASB CODE	PAGE REFERENCE	PERFORMANCE
<b>Greenhouse Gas Emissions</b>	Gross global Scope 1 emissions	TR-RO-110a.1	35	744,805 tonnes CO <sub>2</sub> e
	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	TR-RO-110a.2	30 - 33	Please see our fleet transition plan
	(1) Total fuel consumed, (2) percentage natural gas, (3) percentage renewable	TR-RO-110a.3	38	(1) 312,822,203 litres (2) 7% Natural Gas (3) 11% Renewable Biodiesel
<b>Air Quality</b>	Air emissions of the following pollutants: (1) NO <sub>x</sub> (excluding N <sub>2</sub> O), (2) SO <sub>x</sub> , and (3) particulate matter (PM <sub>10</sub> )*	TR-RO-120a.1	36	NO <sub>x</sub> 317,104.65 kg NO <sub>x</sub> e/km  SO <sub>x</sub> 1,508.29 kg SO <sub>x</sub> e/km  PM <sub>10</sub> 13,784.73 kg PM <sub>10</sub> /km
<b>Driver Working Conditions</b>	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	TR-RO-320a.1	48, 50	(1) 2.39 injuries/no. of man hour x 1,000,000 across all operations (2) Zero, no workplace fatalities were recorded for 2021
	(1) Voluntary and (2) involuntary turnover rate for all employees	TR-RO-320a.2	Under Appendix 5, pg 79	(1) 15% (2) 4%
	Description of approach to managing short term and long-term driver health risks	TR-RO-320a.3	46 - 48	Please see our section on Occupational Health and Safety
<b>Accident &amp; Safety Management</b>	Number of road accidents and incidents	TR-RO-540a.1	50	Total: 770 Singapore: 590 UK/Ireland: 42 Australia: 133 China: 104
	Safety Measurement System BASIC percentiles for: (1) Unsafe Driving, (2) Hours-of-Service Compliance, (3) Driver Fitness, (4) Controlled Substances/Alcohol, (5) Vehicle Maintenance, and (6) Hazardous Materials Compliance	TR-RO-540a.2	-	BASICS system is specific to the US and is not applicable to CDG's business units. However, CDG has established other Safety Management Systems as detailed in the Health and Safety section of the report.
	(1) Number and (2) aggregate volume of spills and releases to the environment	TR-RO-540a.3	-	NA, ComfortDelGro does not engage in hazardous waste transportation.

\* As this is the first year we are reporting on SASB requirements, we have only calculated air quality emission for our Singapore operations. We will look into our overseas operations in future reporting.

## APPENDIX 2: SASB INDEX

ACTIVITY METRIC	SASB CODE	PAGE REFERENCE	PERFORMANCE
<b>Revenue ton miles (RTM)</b>	TR-RO-000.A	-	NA ComfortDelGro does not transport goods and hence this metric is not relevant to our line of business.
<b>Load factor</b>	TR-RO-000.B	-	NA ComfortDelGro does not transport goods and hence this metric is not relevant to our line of business.
<b>Number of employees, number of truck drivers</b>	TR-RO-000.C	51	Total number of employees 22,589

### Car Rental & Leasing - Sustainability Accounting Standard

TOPIC	ACCOUNTING METRIC	SASB CODE	COMFORTDELGRO TAXI'S PERFORMANCE	COMFORTDELGRO RENT-A-CAR'S PERFORMANCE
<b>Customer Safety</b>	Percentage of rental fleet vehicles rated by NCAP programs with an overall 5-star safety rating, by region	TR-CR-250a.1	100% of our taxis are rated with a 5-star safety rating by NCAP programmes. The proportion of vehicles rated by ASEAN NCAP is 33%, Euro NCAP is 56% and Japan NCAP: 11%.  Below, we have also provided a breakdown of individual NCAP programme against the total number of vehicles rated in that NCAP programme. ASEAN NCAP: 100% Euro NCAP: 100% Japan NCAP: 100%	84% of our car rental fleets are rated with a 5-star safety rating by NCAP programmes. The proportion of vehicles rated by ASEAN NCAP is 13%, Australian and New Zealand NCAP is 5%, Euro NCAP is 64% and Japan NCAP is 8%. 9% of vehicles received no NCAP ratings.  Below, we have also provided a breakdown of individual NCAP programme against the total number of vehicles rated in that NCAP programme. ASEAN NCAP: 67% Australian/NZ NCAP – 33% Euro NCAP: 93% Japan NCAP: 89%
	Number of vehicles recalled	TR-CR-250a.2	In Singapore, if a vehicle needs to be recalled by the manufacturer, the motor dealer is responsible for informing our Car Rental and Leasing business units and the Land Transport Authority. We work speedily to respond to these recall notices, and contact customers on necessary follow-up actions if their rental vehicles are affected.  0	126
<b>Fleet Fuel Economy &amp; Utilization</b>	Rental day-weighted average rental fleet fuel economy, by region	R-CR-410a.1	ICE/Hybrid: 21.97 km/litres EV: 7.29 km/kwh	ICE/Hybrid: 11.84 km/litres EV: 5.92 km/kwh
	Fleet utilization rate	R-CR-410a.2	97.2%	91.9%
ACTIVITY METRIC	SASB CODE	COMFORTDELGRO TAXI'S PERFORMANCE	COMFORTDELGRO RENT-A-CAR'S PERFORMANCE	
<b>Average vehicle age</b>	TR-CR-000.A	4.09 years	2.55 years	
<b>Total available rental days</b>	TR-CR-000.B	365 days	365 days	
<b>Average rental fleet size</b>	TR-CR-000.C	8,939 vehicles	1,237 vehicles	






As this is the first year ComfortDelGro is reporting on SASB requirements, we have focused on our Car Rental and Leasing businesses in Singapore – ComfortDelGro Taxi and ComfortDelGro Rent-A-Car. We will look to expand reporting against SASB requirements for our global operations next year.

## APPENDIX 3: UNGC INDEX

PRINCIPLE	DESCRIPTION	PAGE REFERENCE
<b>Human Rights</b>		
Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights; and	51, 80, 82
Principle 2	make sure that they are not complicit in human rights abuses.	51, 80, 82
<b>Labour</b>		
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	51, 80, 82
Principle 4	the elimination of all forms of forced and compulsory labour;	80, 82
Principle 5	the effective abolition of child labour; and	80, 82
Principle 6	the elimination of discrimination in respect of employment and occupation	80, 82
<b>Environment</b>		
Principle 7	Businesses should support a precautionary approach to environmental challenges;	23
Principle 8	undertake initiatives to promote greater environmental responsibility; and	33 - 42
Principle 9	encourage the development and diffusion of environmentally friendly technologies.	24 - 33
<b>Anti-Corruption</b>		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.	63 - 64, 66, 80

# APPENDIX 4: ALIGNMENT WITH THE UN SDG TARGETS

Each core pillar houses key focus areas, which are cemented by targets, commitments, and initiatives, aligned to corresponding and applicable UN SDG targets.





PILLAR	KEY FOCUS AREA	MATERIAL TOPICS	SDG TARGETS
 <p><b>Enabling a climate-friendly and sustainable transport system</b></p>	<p><b>Climate Change Adaptation</b></p> 	<ul style="list-style-type: none"> <li>Climate friendly mobility</li> <li>Sustainable products and services</li> </ul>	<p>Target 13.2: Integrate climate change measures into national policies, strategies and planning</p> <p>Target 13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning</p> <p>Target 12.7: Promote public procurement practices that are sustainable, in accordance with national policies and priorities</p>
	<p><b>Energy and Fuels</b></p> 	<ul style="list-style-type: none"> <li>Energy and fuel use in our operations</li> </ul>	<p>Target 7.2: By 2030, increase substantially the share of renewable energy in the global energy mix</p> <p>Target 7.a: By 2030, enhance international cooperation to facilitate access to clean energy research and technology, including renewable energy, energy efficiency and advanced and cleaner fossil-fuel technology, and promote investment in energy infrastructure and clean energy technology</p>
	<p><b>Emissions and Air Quality</b></p> 	<ul style="list-style-type: none"> <li>GHG emissions</li> <li>Decarbonisation plans</li> <li>Air quality</li> </ul>	<p>Target 13.2: Integrate climate change measures into national policies, strategies and planning</p>
	<p><b>Resource Stewardship</b></p> 	<ul style="list-style-type: none"> <li>Water</li> <li>Waste</li> </ul>	<p>SDG Target 12.5 - By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse</p> <p>SDG Target Target 12.6 - Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle</p>



## APPENDIX 4: ALIGNMENT WITH THE UN SDG TARGETS

PILLAR	KEY FOCUS AREA	MATERIAL TOPICS	SDG TARGETS
 <p><b>Safeguarding the wellbeing, health and safety of our people, our patrons and our communities</b></p>	<p><b>Health and Safety</b></p> 	<ul style="list-style-type: none"> <li>Occupational health and safety</li> <li>Public health and safety</li> </ul>	<p>SDG Target 3.6 - By 2020, halve the number of global deaths and injuries from road traffic accidents</p>
	<p><b>Our People</b></p>   	<ul style="list-style-type: none"> <li>Training</li> <li>Human and labour rights</li> <li>Diversity and equal opportunity</li> <li>Employee wellbeing</li> </ul>	<p>SDG Target 4.4- By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship</p> <p>SDG Target 5.5 - Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life</p> <p>SDG Target 8.5 - By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value</p> <p>SDG Target 8.7 - Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.</p> <p>SDG Target 8.8 - Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.</p>
	<p><b>Our Patrons and Communities</b></p> 	<ul style="list-style-type: none"> <li>Accessibility</li> <li>Service quality</li> <li>Local impact and CSR</li> </ul>	<p>SDG Target 11.2- By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons</p>

## APPENDIX 4: ALIGNMENT WITH THE UN SDG TARGETS

PILLAR	KEY FOCUS AREA	MATERIAL TOPICS	SDG TARGETS	
 <p><b>Growing our business with strong governance, ethical integrity and innovation</b></p>	<b>Ethical Business and Operational Integrity</b>	<ul style="list-style-type: none"> <li>• Compliance and transparency</li> <li>• ESG governance</li> <li>• Risk management</li> <li>• Asset protection and safety</li> </ul>	SDG Target 16.5 - Substantially reduce corruption and bribery in all their forms	
		<b>Cybersecurity and Data Privacy</b>	<ul style="list-style-type: none"> <li>• Protective processes</li> </ul>	
	<b>Innovation and Growth</b>	<ul style="list-style-type: none"> <li>• New innovations</li> <li>• Economic growth</li> </ul>	SDG Target 9.4 - By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities	
		<b>Supply Chain Management</b>	<ul style="list-style-type: none"> <li>• ESG screening</li> <li>• Human and labour rights in the supply chain</li> </ul>	SDG Target 12.7 - Promote public procurement practices that are sustainable, in accordance with national policies and priorities
				

## APPENDIX 5: ADDITIONAL SOCIAL AND EMPLOYMENT-RELATED DISCLOSURES

### MEMBERSHIP OF ASSOCIATIONS

National Taxi Association

National Transport Workers' Union

Singapore Low Carbon Network

Singapore Mediation Centre

Tripartite Alliance for Fair & Progressive Employment Practices

United Nations Global Compact

### WSH COMMITTEES

COUNTRY	BUSINESS UNIT	WORKPLACE SAFETY & HEALTH COMMITTEE OR SIMILAR	COMPANY EMERGENCY RESPONSE TEAM OR SIMILAR	RISK MANAGEMENT COMMITTEE	OTHER SAFETY-RELATED COMMITTEE	NIL
<b>Singapore</b>	All Business Units with the exception of:	X	X	X		
	ComfortDelGro Driving Centre	X	X	X	X	
	ComfortDelGro Rent-A-Car			X		
	SBS Transit	X	X			
<b>Australia</b>	CDC in NSW	X	X			
	CDC in Victoria	X			X	
	Swan Taxi	X	X		X	
<b>China</b>	East China		X		X	
	North China					X
	South China		X		X	
	West China	X				
<b>Ireland</b>	ComfortDelGro Irish Citylink					X
<b>United Kingdom</b>	CityFleet Networks		X	X		
<b>Malaysia</b>	Metroline	X				
	Scottish Citylink Coaches	X				
<b>Malaysia</b>	CityLimo Leasing					X

## APPENDIX 5: ADDITIONAL SOCIAL AND EMPLOYMENT-RELATED DISCLOSURES

### Absentee Rate, by Gender (2021) – ComfortDelGro Group

	MALE	FEMALE	TOTAL
<b>No. of absentee days</b>	139,207	20,969	160,176
<b>No. of scheduled workdays</b>	5,226,297	757,613	5,983,910
<b>Absentee Rate</b>	3%	3%	

### Absentee Rate, by Region (2021) – ComfortDelGro Group

	SINGAPORE	UK	AUSTRALIA	CHINA	MALAYSIA	TOTAL
<b>No. of absentee days</b>	45,655	94,369	18,028	1,124	161	159,337
<b>No. of scheduled workdays</b>	4,084,935	1,097,654	545,210	150,658	9,633	5,888,090
<b>Absentee Rate</b>	1%	9%	3%	1%	2%	3%

### Total number and rate of new employee hires (2021) – ComfortDelGro Group

<b>Total new hires</b>	2,718
<b>New hires, by age group</b>	12%

	< 30 YEARS	30-50 YEARS	>50 YEARS
<b>No. of new hires</b>	601	1,298	819
<b>Rate of new hires (Denominator: total number of employees)</b>	2.5%	6%	3.5%

NEW HIRES, BY GENDER	MALE	FEMALE	TOTAL
<b>No. of new hires</b>	2,169	549	2,169
<b>Rate of new hires (Denominator: total number of employees)</b>	10%	2%	10%

NEW HIRES, BY REGION	SINGAPORE	UK	AUSTRALIA	CHINA	MALAYSIA	TOTAL
<b>No. of new hires</b>	1,522	598	580	13	5	2,718
<b>Rate of new hires (Denominator: total number of employees)</b>	7%	2.5%	2.5%	0%	0%	12%

## APPENDIX 5: ADDITIONAL SOCIAL AND EMPLOYMENT-RELATED DISCLOSURES

Total number and rate of employee turnover (2021) - ComfortDelGro Group

<b>Overall turnover rate</b>	19%
<b>Overall voluntary turnover rate</b>	15%

<b>TURNOVER, BY AGE GROUP</b>	<b>&lt; 30 YEARS</b>	<b>30-50 YEARS</b>	<b>&gt;50 YEARS</b>	<b>TOTAL</b>
<b>No. of voluntary turnover</b>	610	1,565	1,172	3,347
<b>No. of non-voluntary turnover</b>	102	392	488	982
<b>No. of voluntary &amp; non-voluntary turnover</b>	712	1,958	1,660	4,329
<b>Rate of voluntary &amp; non-voluntary turnover (Denominator: total number of employees)</b>	3%	9%	7%	

<b>TURNOVER, BY GENDER</b>	<b>MALE</b>	<b>FEMALE</b>	<b>TOTAL</b>
<b>No. of voluntary turnover</b>	2,721	626	3,347
<b>No. of non-voluntary turnover</b>	837	146	982
<b>No. of voluntary &amp; non-voluntary turnover</b>	3,558	771	4,329
<b>Rate of voluntary &amp; non-voluntary turnover (Denominator: total number of employees)</b>	16%	3%	

<b>RATE OF TURNOVER, BROKEN DOWN BY REGION</b>	<b>SINGAPORE</b>	<b>UK</b>	<b>AUSTRALIA</b>	<b>CHINA</b>	<b>MALAYSIA</b>	<b>TOTAL</b>
<b>No. of voluntary turnover</b>	1,773	703	831	36	4	3,347
<b>No. of non-voluntary turnover</b>	427	363	134	59	0	982
<b>No. of voluntary &amp; non-voluntary turnover</b>	2,200	1,066	964	95	4	4,329
<b>Rate of voluntary &amp; non-voluntary turnover (Denominator: total number of employees)</b>	10%	5%	4%	0%	0%	0

# ANNEX A: SUPPLIER CODE OF CONDUCT

ComfortDelGro Corporation Limited is committed to the highest standards of ethical conduct, social and environmental responsibility and commitment to sustainability.

ComfortDelGro and its subsidiaries worldwide (hereinafter collectively referred to as "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 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 ComfortDelGro.

## 1. COMPLIANCE WITH LAWS AND REGULATIONS

### 1.1. Abidance with the Law

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.

### 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. 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.

### 2.2. Anti-Fraud Stance

In the same vein, 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.

### 2.3. Gifts and Entertainment

ComfortDelGro is committed to conducting all business without undue influence. This 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 ComfortDelGro 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 ComfortDelGro may have business dealings.

### 2.4. Conflicts of Interest

Suppliers should 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.

## 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 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 ComfortDelGro's Human Rights Policy, please visit <https://www.comfortdelgro.com/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.

### 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.

## ANNEX A: SUPPLIER CODE OF CONDUCT

### 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. 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 ComfortDelGro.

## 5. CORPORATE SOCIAL RESPONSIBILITY AND ENVIRONMENTAL SUSTAINABILITY

### 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 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 ComfortDelGro either directly or through an intermediary while in possession of inside information (i.e. confidential material, non-public information) relating to ComfortDelGro nor should they pass such information on 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 its obligations to ComfortDelGro must first be authorised by ComfortDelGro.

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

## 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 ComfortDelGro timely in light of any alleged or actual breach of this Code.

### 8.2. Due Diligence

ComfortDelGro 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 ComfortDelGro Alert Line.

The ComfortDelGro 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: [gciao@comfortdelgro.com](mailto:gciao@comfortdelgro.com)

and/or the respective Chairmen of Audit & Risk Committee (ARC)

- For ComfortDelGro, email to: [ARC\\_Chairman@comfortdelgro.com](mailto:ARC_Chairman@comfortdelgro.com)
- For SBS Transit Ltd, email to: [ARC\\_Chairman@sbstransit.com.sg](mailto:ARC_Chairman@sbstransit.com.sg)
- For Vicom Ltd, email to: [ARC\\_Chairman@vicom.com.sg](mailto:ARC_Chairman@vicom.com.sg)

## ANNEX B: HUMAN RIGHTS POLICY

ComfortDelGro Group'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 ComfortDelGro Group in all locations that we operate in.

### 1. PROHIBITION OF UNETHICAL LABOUR PRACTICES

ComfortDelGro Group does not engage in nor tolerate unethical labour practices such as child labour or forced labour. We strive to uphold and honor 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 ComfortDelGro Group's shall comply with the applicable legislations where the employees are situated. In relation to our Sustainability Framework, ComfortDelGro Group 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 ComfortDelGro Group, 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, ComfortDelGro Group strives to ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

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

### 4. DIVERSITY & INCLUSION

ComfortDelGro Group 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 our Group forward and equal opportunities are given to all our staff.

The Group 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 the Group.

Beyond just physical safety, ComfortDelGro Group 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

ComfortDelGro Group 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 ComfortDelGro Group's Sustainability Framework, one of the key pillars of "Enhancing the Safety and Wellbeing of the Community and our People", 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 Group'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 national averages in our locations of operation.



## ANNEX C: WHISTLEBLOWING 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 ComfortDelGro 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. ComfortDelGro 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 ComfortDelGro 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 ComfortDelGro 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 ComfortDelGro's policies or the Code of Business Conduct