

EYE ON

THE

FUTURE

SUSTAINABILITY  
REPORT

2022

## ABOUT THIS REPORT

COMFORTDELGRO GROUP IS PLEASED TO SHARE OUR 2022 SUSTAINABILITY REPORT, DETAILING OUR PERFORMANCE AND JOURNEY ACROSS THE ENVIRONMENTAL, SOCIAL AND GOVERNANCE (“ESG”) DOMAINS. THIS REPORT ENCOMPASSES THE SUSTAINABILITY AMBITIONS ACROSS ALL OF OUR OPERATIONS GLOBALLY, AND SERVES TO SHARE OUR SUSTAINABILITY COMMITMENTS WITH OUR VALUED STAKEHOLDERS.

As a global mobility service provider, we play an important role in steering the transition to a climate-resilient future. Our key role in providing public transport and connecting communities through mobility services, underpins our commitments to extend positive ESG impact beyond our company – to all our stakeholders.

We are delighted to share our sustainability progress with you in our eighth annual Sustainability Report. This report has been prepared in accordance with the Global Reporting Initiative (“GRI”) Standards 2021, the United Nations Global Compact (“UNGC”) 10 Principles and the Sustainability Accounting Standards Board

(“SASB”): Road Transportation Standard. Our sustainability report also aligns with the SGX 27 Core ESG metrics and the SGX Listing Rule 711 (A) and (B) which is a mandatory reporting requirement by the Singapore Stock Exchange (“SGX”).

We incorporated these international sustainability standards into our report as they enable us to holistically track and report on our management approaches, initiatives and key performance indicators whilst ensuring we remain relevant to the industry and geographies in which we operate. Likewise, they serve to guide us in setting our ambitions and targets for our identified material topics, thereby aiding the success and longevity of our sustainability journey.

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## CONTENTS

2	About This Report	27	<b>Enabling a Climate-Friendly and Sustainable Transport System</b>
6	Message from the Chairman and MD/Group CEO	28	Climate Change Adaptation and Mitigation
10	<b>2022 in Review</b>	31	Climate Friendly Mobility
12	<b>Awards and Accolades</b>	31	Sustainable Products and Services
13	<b>Our Approach to Sustainability</b>	33	Our Fleet Composition and Transition Plan
13	Board Statement	35	Emissions
14	Materiality Approach and Process	37	Energy and Fuels
14	Validation of Material Topics	39	Resource Stewardship
15	Our Sustainability Framework	39	Waste
18	Our Targets and Performance Highlights	41	Water
21	Engagement with our Stakeholders		
26	Membership of Associations		

## ASSURANCE

ComfortDelGro Group Internal Audit has performed an internal review on the compliance with the relevant policies, processes and internal controls pertaining to the data disclosed within the Sustainability Report for the financial year 2022. The audit recommendations through the internal review were taken into consideration during the development of the Sustainability Report. ComfortDelGro Group did not seek external assurance within this reporting cycle. However, we intend to do so in the future.

## FEEDBACK

We believe in continuous development and improvement, and we welcome your feedback on our Sustainability Report. Please reach out to our team at [groupsustainability@comfortdelgro.com](mailto:groupsustainability@comfortdelgro.com).

## RESTATEMENT OF INFORMATION

To ensure robustness of our performance data, we have restated past years' environmental data (i.e., emissions, renewable energy, fuel, electricity consumption, water intensity) in this Sustainability Report due to an improvement in our data collection methodologies resulting in more accurate data calculations for previous years. The restatements for each respective data source have been deemed immaterial however, we are committed to providing the most recent and robust data possible.

## REPORTING SCOPE AND PERIOD

This report outlines ComfortDelGro Group's sustainability performance and relevant ESG considerations for the financial year commencing 1<sup>st</sup> January 2022 to 31<sup>st</sup> December 2022 ("2022"). The countries of our operations where our services are

offered and captured within this report for 2022 include Singapore, Australia, the United Kingdom ("UK"), Ireland, China, New Zealand and Malaysia<sup>1</sup>.

This Sustainability Report supplements ComfortDelGro's **Annual Report 2022**, which can be found on our corporate website [www.comfortdelgro.com](http://www.comfortdelgro.com). To adhere to our environmental principles, this report is only available on our website and is published on 6 April 2023.

Our listed subsidiaries, SBS Transit Ltd and VICOM Ltd, publish independent Sustainability Reports, which can be found on their respective corporate websites ([www.sbstransit.com.sg](http://www.sbstransit.com.sg) and [www.vicom.com.sg](http://www.vicom.com.sg)).

<sup>1</sup> Malaysia has been excluded in the calculation of certain metrics in our current year scope as they are deemed not material in 2022.

**42** Safeguarding the Well-being, Health and Safety of Our People, Patrons and Communities

**43** Health and Safety

**46** Public Health and Safety

**48** Our People

**49** Human and Labour Rights

**52** Diversity and Equal Opportunity

**55** Employee Well-being

**56** Training

**58** Our Patrons and Communities

**58** Accessibility

**60** Service Quality

**61** Local Impact and CSR

**63** Growing Our Business with Strong Governance, Ethical Integrity and Innovation

**64** Ethical Business and Operational Integrity

**67** Cybersecurity, Data Privacy, and Innovation

**69** Supply Chain Management

**71** Appendices

**72** Appendix 1: GRI Content Index

**76** Appendix 2: SASB Index

**78** Appendix 3: UNGC Index



# **MESSAGE FROM THE**

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## **CHAIRMAN AND MD/GROUP CEO**



2022 was the year the world slowly emerged from the ravages of the COVID-19 pandemic, only to be met with new challenges in the form of rising inflation, geopolitical uncertainties and an increase in extreme weather conditions. As a responsible corporate citizen of the world, we endeavour to play our part in doing what we can to minimise our impact on the external environment by integrating Environmental, Social and Governance (“ESG”) considerations into the Group’s business strategies.

#### **ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM**

This year witnessed global climate-related progress such as the publication of the Intergovernmental Panel on Climate Change (“IPCC”)’s Sixth Assessment Report, and the annual Conference of Parties (“COP27”) in Egypt; where ComfortDelGro was invited to be part of the inaugural COP27 Singapore Pavilion held in Egypt, showcasing our contribution to decarbonisation in the

Singapore transport industry. In 2022, the Singapore government also raised their climate change ambitions to achieve net zero emissions by 2050, with the public sector committing to the same goal by 2045, and the Singapore Green Plan 2030 outlining a sustainable development roadmap. In alignment with the above, ComfortDelGro aims to further Singapore’s sustainability progress by providing key enabling services and incorporating internal environmentally friendly changes.

As the first mobility operator in the Southeast Asia region to commit and submit our decarbonisation plans to the Science Based Targets initiative (“SBTi”), the Group has subsequently achieved SBTi validated targets in line with the 1.5°C scenario. Our commitments encompass achieving a 54.6% reduction in absolute Scope 1 and 2 greenhouse gas (“GHG”) emissions from our operations, as well as a 61.2% reduction in absolute Scope 3 GHG emissions from fuel and energy-related activities, both by 2032 in comparison to the baseline year of 2019.

# MESSAGE FROM THE CHAIRMAN AND MD/GROUP CEO

Guided by our Board level Sustainability Committee, we have also progressed in our Task Force on Climate related Financial Disclosures (“TCFD”) journey and published the first inaugural TCFD report in July 2022 ahead of the SGX climate reporting requirements. An updated TCFD report is to be expected in 2023. In effecting all the above, the Group remains active and committed in ensuring the longevity and sustainability of our world for future generations.

## **SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS AND COMMUNITIES**

ComfortDelGro values our employees, stakeholders, and the wider community around us. As a global mobility operator, we strive to improve our society’s well-being and quality of life through our human capital policies, initiatives, and contributions to various charitable causes. We continue to take an inclusive approach to the development of our people with the right mindset, skills, and competencies for the next lap.

Additionally, the Group firmly believes in enhancing the capabilities and well-being of our staff by providing upskilling, training and work experience opportunities. This year, our Group contributed a total of \$1.28 million<sup>2</sup> in donations and over 17,500 volunteer hours to various beneficiaries, reaffirming our commitment to good corporate citizenship. We continually rally our employees and drivers to contribute in the communities they live in. In China, our cabbies offered their services to help the local government during pandemic outbreaks. In Australia, we supported a festival in the Northern Territory to bring people, including the indigenous community, together to embrace diversity. Here in Singapore, our ComfortDelGro Taxi’s cabby volunteer group, CabbyCare Charity Group, continued to actively take part in heartland initiatives, alongside other notable philanthropic contributions.

We continued our efforts in safeguarding public and workplace safety and health. Our regular safety awareness programmes, internal and external road safety talks and trainings continue to promote safety awareness on roads. We also conduct timely checks on the efficiency and safety of our operations. This provides confidence to the public that they are commuting safely.

Accessibility is a key consideration in the provision of our services, to provide a public transport network that supports people with disabilities in their daily commute. We strive to foster an inclusive culture and accessible environment across our operations, thereby enhancing the well-being of our staff, customers, and relevant communities.

## **GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY AND INNOVATION**

Maintaining a culture of strong governance and integrity constitutes a key part of ComfortDelGro’s corporate values. We uphold a stringent zero-tolerance policy for breaches pertaining to unethical practices such as corruption, bribery, and unlawful actions amongst others. To ensure this, we have several initiatives, policies and mechanisms in place. Our Whistleblowing Policy<sup>3</sup> enhances the transparency of our grievance handling mechanism as it allows for reporting by employees or external parties of any unethical or unlawful business conduct or dealings, without the fear of reprisal, discrimination or adverse consequences. Additionally, we incorporated an ESG assessment into our supplier selection criteria to ensure ESG compliance along our supply chain. Our Supplier Code of Conduct<sup>4</sup> is regularly reviewed and revised to reflect our growing focus on sustainability within our supply chain.

2 Excludes donation-in-kind.

3 Refer to our [Whistleblowing Policy](#) for more information.

4 Refer to our [Supplier Code of Conduct](#) for more information.



With the burgeoning use of technology enhancements and innovations, cybersecurity threats have become more prevalent. Consequently, we have in place strong data protection measures. For example, ComfortDelGro Engineering and VICOM Ltd have attained the Data Protection Trustmark (“DPTM”) Certification, a Singapore national-level certification demonstrating accountable data protection practices in compliance to Singapore’s Personal Data Protection Act (“PDPA”).<sup>5</sup> SBS Transit and our other ComfortDelGro business units are also in the process of attaining the DPTM.

### THE WAY FORWARD

ComfortDelGro acknowledges the importance of incorporating Environmental, Social and Governance considerations across our operations to drive holistic business success and foster sustainable development. As such, we stand firm in our execution of sustainability-centred plans and initiatives that will generate value for all stakeholders and the environment around us.

We are extremely grateful that our sustainability efforts were recognised through the various accolades received. This year, ComfortDelGro was once again selected as one of six Singapore companies to be included in the 2022 Dow Jones Sustainability Asia/Pacific (“DJSI Asia Pacific”) Index; It is the fourth year we are included in the index. We also maintained our rating of “AA” grade in the Morgan Stanley Capital International (“MSCI”) ESG rating, and ranked first in the global World Benchmarking Alliance (“WBA”) Climate and Energy Benchmark in Transport 2022. In the latest 2021 edition of the ASEAN Corporate Governance Scorecard, ComfortDelGro was named the third most transparent company in Singapore. We could

not have achieved this without the support of our partners and customers, as well as the faith bestowed on us by our patrons and stakeholders

Going forward, we strive to maintain our position as frontrunners within the sustainability space and welcome our stakeholders to join us in advancing sustainable development within Singapore and beyond.

**LIM JIT POH**  
CHAIRMAN

**CHENG SIAK KIAN**  
MD/GROUP CEO

<sup>5</sup> Refer to our [Personal Data Protection and Privacy Policy](#) for more information.

# 2022 IN REVIEW



## GHG EMISSIONS (tCO<sub>2</sub>e)

### Scope 1

2022: 718,810  
2021: 744,805

### Scope 2

2022: 188,322  
2021: 192,982

### Scope 3

2022: 494,545  
2021: 550,095

### Scope 1+2+3

2022: 1,401,677  
2021: 1,487,882

## GHG INTENSITY (SCOPE 1 + 2) (tCO<sub>2</sub>e/\$M REVENUE)

2022: 240  
2021: 268<sup>6</sup>  
2020: 290



<sup>6</sup> GHG Intensity for 2021 was restated due to a restatement of revenue for 2021. Refer to ComfortDelGro [Annual Report 2022](#), page 24.





## FUEL CONSUMPTION (LITRES)

### Bio-blend diesel (B20)

2022: 32,297,101  
2021: 34,016,891  
2020: N/A

### Petrol

2022: 40,017,809  
2021: 38,830,319  
2020: 33,264,997

### Diesel

2022: 207,793,438  
2021: 217,276,303  
2020: 252,762,130

### CNG (m<sup>3</sup>)

2022: 25,937,804  
2021: 22,698,690  
2020: 15,813,088

## ELECTRICITY CONSUMPTION (kWh)

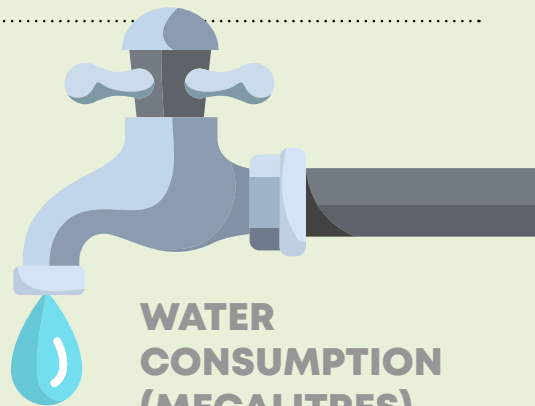


### Electricity purchased

2022: 490,803,782  
2021: 468,051,266  
2020: 444,914,841

### Renewable electricity generated

2022: 4,664,660  
2021: 2,393,358  
2020: 1,743,025



## WATER CONSUMPTION (MEGALITRES)

2022: 2,188  
2021: 2,510

## WASTE (TONNES)

### Waste generated

2022: 11,283  
2021: 8,314

### Waste diverted from disposal

2022: 4,759  
2021: 4,558

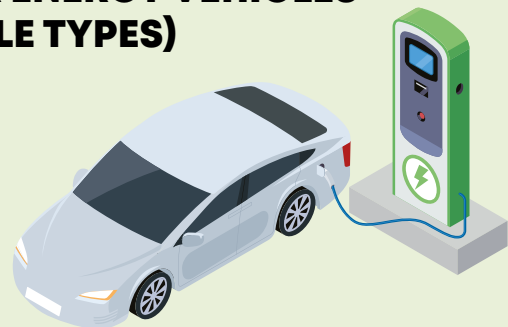


## % CLEANER ENERGY VEHICLES (ALL VEHICLE TYPES)

Singapore  
**47%**

UK & Ireland  
**54%**

Australia  
**14%**



China  
**65%**

New Zealand  
**100%**

# 2022 IN REVIEW

## WORKPLACE SAFETY



### Workplace Injury Rate (WIR) per 100,000 employees

	2020	2021	2022
Singapore	455	714	408
UK & Ireland	616	356	619
Australia	1,008	1,929	2,700
China	-7	739	0

4 Work-related fatalities across our operations in 2022<sup>8</sup>



## ACCESSIBILITY FOR BUSES

### Wheelchair Accessibility of Public Buses (%)

	2021	2022
Singapore	100%	100%
UK & Ireland	100%	100%
Australia	100%	100%

### Wheelchair Accessibility of All Buses (Public buses, coaches, and private hire buses) (%)

	2021	2022
Singapore	98%	98%
UK & Ireland	82%	98%
Australia	64%	64%

## AVERAGE TRAINING HOURS PER EMPLOYEE

2022: 22.1 hours  
2021: 20.2 hours  
2020: 18.6 hours



## DONATIONS

2022: S\$1.28 million<sup>9</sup>  
2021: S\$2.07 million  
2020: S\$1.44 million



## DIVERSITY METRICS (%)



### Female employees

2022: 15%  
2021: 14%  
2020: 15%

### Employees aged above 50 years old

2022: 43%  
2021: 43%  
2020: 41%

### Nationalities

	2021	2022
Singaporean	31%	31%
Malaysian	19%	19%
British	16%	15%
Australian	14%	14%
Chinese	6%	6%
New Zealander	-	2%
Irish	-	0.3%
Others	14%	12.7%

## WORKFORCE BY COUNTRIES SIZE

	2021	2022
Singapore	56%	53%
UK & Ireland	24%	21%
Australia	17%	21%
China	3%	2%
New Zealand	-	3%

## FINANCIAL PERFORMANCE AT A GLANCE

**TOTAL NUMBER OF OPERATIONS**  
**30,500 VEHICLES WORLDWIDE**

**OPERATION PROFIT:**  
**S\$270.0 MILLION**

**NET REVENUE**  
**S\$3,780.8 MILLION**

**PROFIT ATTRIBUTABLE TO SHAREHOLDERS**  
**S\$173.1 MILLION**

**EBITDA**  
**S\$590.9 MILLION**

**EARNINGS PER ORDINARY SHARE (CENTS)**  
**OVER REGION OF OPERATIONS : S\$7.99 CENTS**

More details on our financial performance can be found on pages 121 to 243 in the ComfortDelGro [Annual Report 2022](#).

# AWARDS AND ACCOLADES

## COMFORTDELGRO ACHIEVEMENTS



Member of

### Dow Jones Sustainability Indices

Powered by the S&P Global CSA

#### DOW JONES SUSTAINABILITY ASIA/PACIFIC INDEX

- Included in the DJSI Asia Pacific for a fourth year in 2022
- One of the six Singapore companies to be included

## S&P Global

#### S&P GLOBAL SUSTAINABILITY YEARBOOK 2023

- Included in the S&P Global Sustainability Yearbook 2023

## MSCI ESG RATINGS



CCC B BB BBB A AA AAA

#### MORGAN STANLEY CAPITAL INTERNATIONAL ESG RATING

- Received an "AA" rating in 2022

#### FTSE4GOOD INDICES

- Included in the FTSE4Good Indices

#### LION-OCBC SECURITIES

SINGAPORE LOW CARBON ETF

#### IEDGE-OCBC LOW CARBON SELECT 50 CAPPED INDEX

- Included in the iEdge-OCBC Low Carbon Select 50 Capped Index

#### WORLD BUSINESS COUNCIL FOR SUSTAINABLE DEVELOPMENT ("WBCSD")

- Member of the Mobility Decarbonization project
- Contributors to the Financing Charging Infrastructure white paper 2022

#### WORLD BENCHMARKING ALLIANCE ("WBA") CLIMATE AND ENERGY BENCHMARK IN TRANSPORT 2022

- Ranked first in the global World Benchmarking Alliance ("WBA") Climate and Energy Benchmark in Transport 2022, in partnership with CDP

#### SECURITIES INVESTORS ASSOCIATIONS (SINGAPORE) ("SIAS") INVESTORS' CHOICE AWARDS

- ComfortDelGro won two runner-up titles for the "Singapore Corporate Governance Award" (Big-Cap) and the "Most Transparent Company Award" (Industrials) in 2022

#### SINGAPORE ROAD SAFETY COUNCIL ("SRSC")

- ComfortDelGro Bus was awarded the SRSC Company Award in 2022

#### SINGAPORE ENVIRONMENTAL ACHIEVEMENT AWARDS 2022

- Singapore Environment Council ("SEC")'s Singapore Environmental Achievement Awards 2022 under the Green Transport category. The award recognises the Group efforts on environmental stewardship, supporting Singapore's electric vehicle adoption plans, and driving energy efficiency into its operations

## COMFORTDELGRO'S SUBSIDIARIES' ACHIEVEMENTS

### SBS TRANSIT

#### STRAITS TIMES SINGAPORE'S BEST EMPLOYERS 2022 (TOP 200)

#### HR ASIA: DIGITAL TRANSFORMATION AWARD 2022

#### HR ASIA'S BEST COMPANIES TO WORK FOR IN ASIA AWARD 2022 (SINGAPORE EDITION)

- In recognition of SBS Transit's efforts in establishing a workplace where its people feel recognised, respected and cared for

#### NATIONAL WORKPLACE LEARNING CERTIFICATION AWARD (PLATINUM)

#### SILVER RIBBON MENTAL HEALTH AWARD FOR EMPLOYERS

#### SINGAPORE ROAD SAFETY AWARD (SAFE DRIVER AWARD METRIC, PUBLIC BUS FLEET AWARD)

#### PUBLIC TRANSPORT SAFETY AND SECURITY AWARD

- Excellence Award (Bedok Bus Package)
- Merit Award (Jurong West Bus Package)

#### LAND TRANSPORT EXCELLENCE AWARDS 2022

- Innovative/Effective Safety Programme (Excellence)
- Best Service Partner (Service Delivery) (Merit)

#### SIAS INVESTORS' CHOICE AWARDS

- SBS Transit was awarded with the "Shareholder Communication Excellence Award" (Mid-Cap) as well as Runner-up for the "Most Transparent Company Award" (Industrials)

#### ATTAINED THE ECO-OFFICE CERTIFICATION: ELITE TIER BY SEC

#### SINGAPORE CORPORATE AWARDS 2022

- SBS Transit was awarded "Gold" under the "Best Managed Board Award" (Mid-Cap)
- SBS Transit was awarded "Gold" under the "Best Risk Management Award" (Mid-Cap)
- SBS Transit was awarded "Silver" under the "Best Annual Report Award" (Mid-Cap)

### VICOM GROUP

#### SIAS INVESTORS' CHOICE AWARDS

- VICOM Group won the "Runner Up for Shareholder Communications Excellence Award ("SCEA") 2022" for Mid-Cap Category

#### ATTAINED THE ECO-OFFICE CERTIFICATION: CHAMPION TIER BY SEC

#### CERTIFIED WITH THE DATA PROTECTION TRUSTMARK CERTIFICATION, LAUNCHED BY INFOCOMM MEDIA DEVELOPMENT AUTHORITY ("IMDA")

#### SINGAPORE CORPORATE AWARDS 2022:

- Mr Sim Wing Yew, CEO of VICOM Group was awarded the "Best CEO Award" (Mid-Cap) at the Singapore Corporate Awards 2022

#### SINGAPORE CORPORATE AWARDS 2022

- VICOM Group won the "Silver Award for Best Risk Management" for Mid-Cap Category (Between S\$300 million and \$1 billion in market capitalisation) by the Singapore Corporate Awards 2022

### COMFORTDELGRO CORPORATION AUSTRALIA ("CDC")

#### NEW SOUTH WALES ("NSW") PREMIER'S AWARD IN RECOVERY AND RESILIENCE:

- National Patient Transport ("NPT") was presented by New South Wales Government presented with the NSW Premier's Award in Recovery and Resilience, as a Partner Organisation for its COVID-19 discharge shuttle service

#### THE VICTORIAN WORKSAFE AWARD 2022:

- CDC Victoria was presented with the Commitment to Prevention of Mental Injury in the Workplace award for its Healthy Minds Work programme<sup>10</sup>

10 CDC Victoria was presented the award on 23 February 2023.



# OUR APPROACH TO SUSTAINABILITY



## OUR APPROACH TO SUSTAINABILITY

### BOARD STATEMENT

ComfortDelGro is committed to creating long-term shared value for our stakeholders while driving positive impact for people, planet and society. ComfortDelGro's Board and Sustainability Committee ("SC") provide the corporate governance oversight to integrate Environment, Social and Governance ("ESG") considerations into the Group's business strategy and all material sustainability issues.

Sustainability is also embedded within ComfortDelGro's core values and mission. Our sustainability framework is aligned with the United Nations' Sustainable Development Goals ("UN SDGs"), and reflects the material topics that impact our business, our environment and society. Our sustainability framework consists of the following three key pillars:

1. Enabling a climate-friendly and sustainable transport system;
2. Safeguarding the well-being, health and safety of our people, patrons and communities;
3. Growing our business with strong governance, ethical integrity and innovation.

As an international mobility operator, it is crucial for us to deliver clean, low carbon transport solutions with the aim of reaching net zero emissions reduction targets by 2050 in line with Article 6 of the Paris Agreement. We have set clear decarbonisation targets for our greenhouse gas ("GHG") emissions. In 2022, our emissions reduction target have been officially approved by the Science Based Targets initiative ("SBTi") and are consistent with reductions required to limit global warming to 1.5°C above pre-industrial levels, the most ambitious goal of the Paris Agreement.

To achieve our targets, we are continuing our efforts to electrify our fleets globally and investing in emerging mobility technologies and innovation. This includes building new partnerships, shifting towards renewable energy sources, enhancing the efficiency of our operations and responsibly managing our energy, fuel, water usage as well as our other limited resources.

Our people play a vital role in ComfortDelGro's success. Following the launch of the new Code of Practice ("COP") on Chief Executives and Board of Directors' Workplace Safety and Health ("WSH") Duties in October 2022, all company directors attended a WSH training workshop on the COP and assigned WSH oversight to the sustainability committee. We ensure a safe and healthy environment for all our employees by protecting their mental and physical well-being – prioritising health and safety, equal opportunities, diversity and inclusion, as well as training and upskilling for our employees. For our customers, we strive to deliver the highest service quality by providing accessible mobility solutions and making a positive impact to the communities that we operate in.

The Board provides key oversight in upholding strong corporate governance and ethical business practices throughout the organisation. We have established a clear and transparent whistleblowing process, and we adopt a zero-tolerance policy towards corruption, bribery, and unlawful actions. We have developed and implemented strong policies to ensure robust cybersecurity measures and the protection of personal data.

We have also implemented a clear code of conduct for all employees and suppliers, which ensure that all activities in the Group's value chain are aligned with our sustainability and ethical business principles. We aim to capitalise on our sphere of influence to improve industry practices and drive positive change.

The Board plays a crucial role in the monitoring, oversight and management of the Group's business strategy, sustainability framework and ESG performance. Our Board members regularly update their skills and capabilities through relevant training programmes. Working closely with senior management, the Board ensures ComfortDelGro's alignment with relevant sustainability guidelines, regulations and standards. The Group has also embarked on efforts to integrate ESG factors into executive compensation to support long-term sustainability performance.

Through our continued efforts to integrate our sustainability vision with our business strategy, we firmly believe that we will be able to create long-term value for society and the environment.



## OUR APPROACH TO SUSTAINABILITY

### MATERIALITY APPROACH AND PROCESS

In line with GRI 2021, we conducted a revised materiality assessment to refresh and reprioritise key material topics with an independent external consultant. Through this process, we managed to holistically identify the material topics most relevant to us.

In 2021, we undertook a stakeholder engagement exercise with our internal and external stakeholders – these stakeholders include ComfortDelGro’s key management, employees, regulatory agencies, shareholders, unions, and suppliers. This process aided in the identification and validation of our materiality revision. It also further improved our materiality process, allowing us to keep up with emerging sustainability issues and the evolving landscape while providing us with a materiality refresh and reprioritisation of our material topics. This helps us focus on identifying the positive and negative impacts from ComfortDelGro’s business operations on society and the environment.

Under the new materiality methodology, an additional materiality refresh was conducted in 2022. Additional

landscape analysis and peer reviews were conducted to further enhance the context for the material topics as greater emphasis was placed on the impact of ComfortDelGro’s business operations on the people, environment and economy surrounding us. The refreshed materiality assessment also accounted for the emerging sustainability issues as well as industry and market needs for us moving forward.

### VALIDATION OF MATERIAL TOPICS

The reassessment of our material topics included a validation process with our Board level Sustainability Committee, the results of which assisted in the prioritisation of material ESG topics critical to our business. A materiality revision exercise was also performed by two of our listed subsidiaries – SBS Transit Ltd and VICOM Ltd, and their results were also taken into consideration.

Overall, our material topics have not changed since our assessment in 2021. However, the reassessment has resulted in a reprioritised list of material topics as seen in the table below.

PILLAR	KEY MATERIAL TOPICS	MATERIAL SUB-TOPICS
<b>ENVIRONMENTAL</b> Enabling a climate-friendly and sustainable transport system	<b>Climate Change Adaptation and Mitigation</b>	<ul style="list-style-type: none"> <li>Climate Friendly Mobility</li> <li>Sustainable Products and Services</li> </ul>
	<b>Emissions</b>	N/A
	<b>Energy and Fuels</b>	N/A
	<b>Resource Stewardship</b>	<ul style="list-style-type: none"> <li>Water</li> <li>Waste</li> </ul>
<b>SOCIAL</b> Safeguarding the Well-being, Health and Safety of Our People, Patrons and Communities	<b>Health and Safety</b>	<ul style="list-style-type: none"> <li>Occupational Health and Safety</li> <li>Public Health and Safety</li> </ul>
	<b>Our People</b>	<ul style="list-style-type: none"> <li>Human and Labour Rights</li> <li>Diversity and Equal Opportunity</li> <li>Employee Well-being</li> <li>Training</li> </ul>
	<b>Our Patrons and Communities</b>	<ul style="list-style-type: none"> <li>Accessibility</li> <li>Service Quality</li> <li>Local Impact and CSR</li> </ul>
<b>GOVERNANCE AND ECONOMY</b> Growing Our Business with Strong Governance, Ethical Integrity, and Innovation	<b>Ethical Business and Operational Integrity</b>	N/A
	<b>Cybersecurity, Data Privacy and Innovation</b>	N/A
	<b>Supply Chain Management</b>	N/A

## OUR APPROACH TO SUSTAINABILITY

### OUR SUSTAINABILITY FRAMEWORK


ComfortDelGro's Sustainability Framework comprises three core pillars:

**E** Enabling a climate-friendly and sustainable transport system

**S** Safeguarding the well-being, health, and safety of our people, patrons, and communities

**G** Growing our business with strong governance, ethical integrity, and innovation

Our sustainability framework drives our strategy to prioritise material impacts whilst enhancing our focus on ESG. The framework is aligned to the UN SDGs at the target level, where we support the achievements of the SDGs through our three key pillars mapped to established targets, commitments, and implementation measures.




PILLAR	KEY MATERIAL TOPICS	MATERIAL SUB-TOPICS	SDG TARGETS
 <p><b>ACCELERATING TOWARDS CLIMATE CHANGE ADAPTATION AND MITIGATION</b></p>	Climate Change Adaptation and Mitigation	<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>
	Emissions	<ul style="list-style-type: none"> <li>Emissions</li> </ul>	<p>Target 13.2 – Integrate climate change measures into national policies, strategies, and planning</p>
	Energy and Fuels		<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>
	Resource Stewardship	<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 12.6 – Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle</p>

## OUR APPROACH TO SUSTAINABILITY

PILLAR	KEY MATERIAL TOPICS	MATERIAL SUB-TOPICS	SDG TARGETS
 <p><b>DRIVING THE SAFETY AND WELL-BEING OF OUR PEOPLE, OUR PATRONS, AND OUR COMMUNITIES</b></p>	Health and Safety	<ul style="list-style-type: none"> <li>Occupational Health and Safety</li> <li>Public Health and Safety</li> </ul>	SDG Target 3.6 – By 2020, halve the number of global deaths and injuries from road traffic accidents
	Our People	<ul style="list-style-type: none"> <li>Human and Labour Rights</li> <li>Diversity and Equal Opportunity</li> <li>Employee Well-being</li> <li>Training</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>
	Our Patrons and Communities	<ul style="list-style-type: none"> <li>Accessibility</li> <li>Service Quality</li> <li>Local Impact and CSR</li> </ul>	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



## OUR APPROACH TO SUSTAINABILITY

PILLAR	KEY MATERIAL TOPICS	MATERIAL SUB-TOPICS	SDG TARGETS
 <p><b>UPHOLDING STRONG GOVERNANCE AND ETHICAL BUSINESS IN OUR JOURNEY TOWARDS SUSTAINABLE ECONOMIC GROWTH AND INNOVATION</b></p>   	Ethical Business and Operational Integrity		SDG Target 16.5 – Substantially reduce corruption and bribery in all their forms
	Cybersecurity, Data Privacy and Innovation		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 acting in accordance with their respective capabilities
	Supply Chain Management		SDG Target 12.7 – Promote public procurement practices that are sustainable, in accordance with national policies and priorities

## OUR APPROACH TO SUSTAINABILITY

### OUR TARGETS AND PERFORMANCE HIGHLIGHTS

To reiterate our continuous effort in our sustainability journey, ComfortDelGro has undertaken a revision of our short-, medium- and long-term targets relating to each pillar, for better alignment with our material topics and sustainability framework.

- Achieved/on track
- Requires improvement

MATERIAL TOPICS	2022 PERFORMANCE & ACHIEVEMENTS	PROGRESS	SHORT-TERM, MEDIUM-TERM & LONG-TERM TARGETS
<b>CLIMATE CHANGE ADAPTATION AND MITIGATION</b> <ul style="list-style-type: none"> <li>• Climate friendly mobility</li> <li>• Sustainable products and services</li> </ul>	<ul style="list-style-type: none"> <li>• 65% of our total car fleet globally are cleaner energy vehicles</li> </ul>	●	<ul style="list-style-type: none"> <li>• Transition 90% of our total car fleet across all our operations globally to cleaner energy vehicles by 2030 and 100% by 2040</li> <li>• Transition 50% of our total bus fleet across all our operations globally to cleaner energy vehicles by 2030 and 100% by 2050</li> <li>• Continue to keep 100% of our total rail across all our operations globally to using electric traction power</li> <li>• Continue to remain abreast of climate-friendly mobility solutions and adopt appropriate solutions for future mitigation and adaptation</li> </ul>
<b>EMISSIONS</b>	<ul style="list-style-type: none"> <li>• Reduced GHG emissions intensity in 2022 from 2021 (240 tCO<sub>2</sub>e/\$S\$M Revenue)</li> </ul>	●	<ul style="list-style-type: none"> <li>• 54.6% reduction in absolute Scope 1 and Scope 2 GHG emissions from our operations by 2032 from a baseline year of 2019</li> <li>• 61.2% reduction in absolute Scope 3 GHG emissions from fuel and energy-related activities by 2032 from a baseline year of 2019</li> <li>• Aiming to reach net zero timelines and targets for the transport sector, set by the countries that we operate in</li> </ul>
<b>ENERGY AND FUELS</b>	<ul style="list-style-type: none"> <li>• Increased solar photovoltaic ("PV") capacity to 4.885 MWp globally</li> </ul>	●	<ul style="list-style-type: none"> <li>• Increase solar PV output to 8 MWp by 2030</li> <li>• Continue to investigate renewable energy options for adoption in our businesses</li> </ul>
<b>RESOURCE STEWARDSHIP</b>	<ul style="list-style-type: none"> <li>• 62.5% of our offices in Singapore are Eco-Office certified</li> </ul>	●	<ul style="list-style-type: none"> <li>• 50% of all office buildings globally to be environmentally friendly (i.e. Eco-Office certified or their equivalent) by 2030, and 100% by 2050</li> </ul>

## OUR APPROACH TO SUSTAINABILITY

- Achieved/on track
- Requires improvement

MATERIAL TOPICS	2022 PERFORMANCE & ACHIEVEMENTS	PROGRESS	SHORT-TERM, MEDIUM-TERM & LONG-TERM TARGETS
<b>HEALTH AND SAFETY</b> <ul style="list-style-type: none"> <li>• Occupational health and safety</li> <li>• Public health and safety</li> </ul>	<ul style="list-style-type: none"> <li>• 3 employee fatalities: 2 fatalities in CDC, and 1 from SBS Transit</li> <li>• 1 non-employee fatality: ComfortDelGro Bus</li> </ul>	●	<ul style="list-style-type: none"> <li>• Zero cases of work-related fatalities and work-related high consequence safety incidents annually</li> <li>• Lost-time injury rates below the national averages in our respective locations of operation</li> </ul>
<b>OUR PEOPLE</b> <ul style="list-style-type: none"> <li>• Training</li> <li>• Human and labour rights</li> <li>• Diversity and equal opportunities</li> <li>• Employee well-being</li> </ul>	<ul style="list-style-type: none"> <li>• 36% female representation in our Board</li> <li>• 14% female representation in our workforce</li> <li>• 22.1 average training hours annually per employee globally</li> </ul>	●	<ul style="list-style-type: none"> <li>• Maintain a minimum of 30% female representation on the Board</li> <li>• Achieve 30 training hours annually per employee globally by 2030</li> <li>• Zero affiliation with operations with significant risks affiliated with child labour, hazardous or forced labour, underage employment and labour exploitation annually</li> <li>• Zero incidences of non-compliance relating to violation of rights, relevant regulations and policies and complaints relating to discrimination and equal opportunity annually</li> <li>• Invest in education, training and digital training across all Business Units</li> <li>• Continue commitment to the United Nations Global Compact (“UNGC”), International Labour Organisation (“ILO”), TAFEP for fair employment practices and adhere to existing practices imposed by local manpower regulations annually</li> <li>• Uphold diversity representation in the workplace in terms of gender, race, ability, and age amongst other backgrounds where possible and applicable</li> <li>• Ensure an equitable remuneration structure based on work performance without gender bias</li> </ul>
<b>OUR PATRONS AND COMMUNITIES</b> <ul style="list-style-type: none"> <li>• Accessibility</li> <li>• Service quality</li> <li>• Local impact and CSR</li> </ul>	<ul style="list-style-type: none"> <li>• All our public bus and trains are 100% wheelchair accessible</li> </ul>	●	<ul style="list-style-type: none"> <li>• Continuous improvements in mobility and accessibility for the communities</li> </ul>

## OUR APPROACH TO SUSTAINABILITY

- Achieved/on track
- Requires improvement

MATERIAL TOPICS	2022 PERFORMANCE & ACHIEVEMENTS	PROGRESS	SHORT-TERM, MEDIUM-TERM & LONG-TERM TARGETS
<b>ETHICAL BUSINESS AND OPERATIONAL INTEGRITY</b> <ul style="list-style-type: none"> <li>• Anti-bribery</li> <li>• Anti-corruption</li> <li>• Competitive behaviour</li> <li>• Compliance, ethical conduct, transparency, and accountability</li> <li>• ESG governance</li> <li>• Systemic risk management</li> <li>• Asset protection and safety</li> </ul>	<ul style="list-style-type: none"> <li>• One case of personal bribery occurred between 2019 and 2021, sentenced in 2022 (SBS Transit)</li> <li>• 85 employees in Singapore received anti-corruption training</li> <li>• 100% employees made their annual declaration on ComfortDelGro's Code of Business Conduct<sup>11</sup></li> <li>• Zero incidents of bribery, anti-corruption behaviour and non-compliance with voluntary codes</li> <li>• 90% board independence</li> </ul>	●	<ul style="list-style-type: none"> <li>• Maintain high standards of transparency, accountability, ethics, and integrity across our operations</li> <li>• Maintain zero cases of non-compliance to anti-competitive behaviour, bribery, and corruption</li> <li>• 100% employees globally to undergo mandatory anti-corruption training by 2025</li> <li>• 100% employees globally to make their annual declaration on ComfortDelGro's Code of Business Conduct by 2024</li> <li>• Maintain above 50% board independence annually, enhancing compliance with the 33% board independence requirements as per SGX and MAS</li> </ul>
<b>CYBERSECURITY AND DATA PRIVACY</b>	<ul style="list-style-type: none"> <li>• Zero substantiated complaints concerning breaches of customer privacy</li> <li>• Zero complaints received from outside parties and regulatory bodies</li> <li>• Zero identified leaks, thefts or losses of customer data</li> </ul>	●	<ul style="list-style-type: none"> <li>• Maintain zero major cybersecurity breaches</li> <li>• Continuously solidify cybersecurity, data protection and privacy measures</li> <li>• Continue to conduct internal audits to measure adherence to PDPA Policies</li> </ul>
<b>INNOVATION AND GROWTH</b> <ul style="list-style-type: none"> <li>• Technology and innovation</li> <li>• Economic performance, growth and opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• The Digitalisation Board Committee set up in 2020 continues to ensure strategic digitalisation investments are made annually</li> <li>• Continuous investments made through ComfortDelGro Ventures, a US\$100 million corporate venture capital fund set up in 2019</li> <li>• Set up a S\$30 million Autonomous Vehicle Centre of Excellence aimed at building up its capabilities in the operations and maintenance of AVs in 2022</li> </ul>	●	<ul style="list-style-type: none"> <li>• Continue to develop and invest in new digital solutions, services and new businesses to meet our customers' changing needs</li> </ul>
<b>SUPPLY CHAIN MANAGEMENT</b> <ul style="list-style-type: none"> <li>• Environmental screening</li> <li>• Social screening</li> </ul>	<ul style="list-style-type: none"> <li>• Zero supplier incidents of social or environmental non-compliance occurring within ComfortDelGro's premises or operations</li> </ul>	●	<ul style="list-style-type: none"> <li>• Zero supplier incidents of social or environmental non-compliance occurring within ComfortDelGro's premises or operations</li> <li>• Ensure 100% compliance on ComfortDelGro's Supplier Code of Conduct<sup>12</sup> i.e. environmental responsibility; labour rights</li> </ul>

<sup>11</sup> Refer to our [Code of Business Conduct](#) for more information.



<sup>12</sup> Refer to our [Supplier Code of Conduct](#) for more information.





## OUR APPROACH TO SUSTAINABILITY

### ENGAGEMENT WITH OUR STAKEHOLDERS



ComfortDelGro thrives on connecting people and engaging with our stakeholders to understand their needs. This is an essential part of our sustainability journey as it fosters trust and integrity amongst our key stakeholders. We identify our stakeholders based on the impacts our business has on them, as well as their role in impacting our operations. As a means of actively engaging key stakeholders regularly, ComfortDelGro utilises the various channels below.

STAKEHOLDERS	FORMS OF ENGAGEMENT	FREQUENCY OF ENGAGEMENT	STAKEHOLDER PRIORITIES RAISED	OUR RESPONSE TO PRIORITIES
<b>CUSTOMERS</b> 	<p><b>Commuters</b></p> <ul style="list-style-type: none"> <li>Information counters at bus interchanges/MRT stations, website, app and hotline</li> <li>Social media channels to engage customers and to promote our services</li> <li>Satisfaction survey such as the Public Transport Customer Satisfaction Survey, conducted by the Public Transport Council</li> </ul> <p><b>Businesses</b></p> <ul style="list-style-type: none"> <li>Client engagement and presentations on our green mobility products and services</li> <li>Outreach programmes where new and existing customers are invited to visit our operations</li> </ul>	<p><b>Commuters</b></p> <ul style="list-style-type: none"> <li>Daily</li> </ul> <p><b>Businesses</b></p> <ul style="list-style-type: none"> <li>Engage as needed</li> </ul>	<ul style="list-style-type: none"> <li>Public health and safety</li> <li>Service quality</li> </ul>	<ul style="list-style-type: none"> <li>Operate services according to planned schedules and adhere to robust safety standards and stringent checks</li> <li>Work with Traffic Police to improve road safety and conduct up-to-date training for all Bus Captains and Customer Service Officers to ensure the highest standards of safety and security</li> <li>Implement Safe Management Measures to keep our commuters safe</li> </ul>
<b>EMPLOYEES</b> 	<ul style="list-style-type: none"> <li>Virtual dialogue sessions with staff to better understand employee needs and concerns</li> <li>Update on staff Code of Business Conduct, welfare and benefits on intranet</li> <li>Employee Engagement Survey</li> </ul>	<ul style="list-style-type: none"> <li>Annually</li> <li>Engage as needed</li> </ul>	<ul style="list-style-type: none"> <li>Training and development</li> <li>Health and safety at work</li> <li>Service quality</li> <li>Ethical and transparent business</li> </ul>	<ul style="list-style-type: none"> <li>Team bonding, well-being and community giving events</li> <li>Implement Safe Management and ART testing measures for staff at our work and support flexible work arrangement for those who can work from home</li> <li>Regular seminars and training courses ensure employees' skills remain future-ready</li> <li>Support employee training such as conducting digital readiness and cybersecurity training sessions</li> <li>Employee Code of Business Conduct to provide guidance on ethical business behaviour</li> </ul>

## OUR APPROACH TO SUSTAINABILITY

STAKEHOLDERS	FORMS OF ENGAGEMENT	FREQUENCY OF ENGAGEMENT	STAKEHOLDER PRIORITIES RAISED	OUR RESPONSE TO PRIORITIES
<b>UNIONS &amp; ASSOCIATIONS SHAREHOLDERS</b> 	<ul style="list-style-type: none"> <li>Ensure regular engagement and productivity meeting with key union leaders</li> <li>Establish strong labour management relations grounded on good tripartite collaboration</li> </ul>	<ul style="list-style-type: none"> <li>Annually</li> </ul>	<ul style="list-style-type: none"> <li>Safety and well-being of employees</li> <li>Training and development</li> <li>Fair compensation</li> </ul>	<ul style="list-style-type: none"> <li>We uphold tripartism and commit to working closely with the union to achieve win-win outcomes</li> <li>We work with the union to improve operational, safety and security performance so that we do well and reward our workers better</li> </ul>
<b>INVESTORS</b> 	<ul style="list-style-type: none"> <li>Meeting with some 212 groups of investors, analysts and equity sales personnel; The team also addressed queries from investors through emails, telephone calls and the online enquiry form</li> <li>Participation in 10 virtual investor conferences and non-deal roadshows</li> <li>Organised face-to-face briefings for the media and sellside analysts, with some 80 research reports on the Company and the industry were published during the year</li> <li>Shareholders have the opportunity to interact with the Board and Senior Management at our Annual General Meeting; Electronic voting also allows for transparent process</li> <li>All material announcements posted in the Investor Relations section of our corporate website</li> </ul>	<ul style="list-style-type: none"> <li>Throughout the year</li> </ul>	<ul style="list-style-type: none"> <li>Ethical and transparent business</li> <li>Climate change adaptation and mitigation</li> <li>Innovation and technology</li> <li>Employee safety and well-being</li> </ul>	<ul style="list-style-type: none"> <li>The Investor Relations team has regular interactions with investors, shareholders and analysts to ensure a thorough understanding of our business models and strategies, operations and financial performance and growth opportunities</li> <li>We are committed to disseminate accurate and pertinent information to the market in a timely manner as part of good corporate governance</li> <li>We participate in ESG ratings, such as DJSI, Sustainalytics, MSCI and CDP, to disclose our ESG performance and efforts to our shareholders</li> </ul>

## OUR APPROACH TO SUSTAINABILITY

STAKEHOLDERS	FORMS OF ENGAGEMENT	FREQUENCY OF ENGAGEMENT	STAKEHOLDER PRIORITIES RAISED	OUR RESPONSE TO PRIORITIES
<b>PARTNERS &amp; SUPPLIERS</b> 	<ul style="list-style-type: none"> <li>Reviewed our Supplier Code of Conduct<sup>13</sup> to reflect our sustainability ambition</li> <li>Work closely and communicate with our Partners and Suppliers to ensure the smooth delivery of our services that complies with our ESG expectations</li> <li>Supplier environmental and social screening assessment questionnaire</li> </ul>	<ul style="list-style-type: none"> <li>Throughout the year</li> </ul>	<ul style="list-style-type: none"> <li>Innovation and technology</li> <li>Collaboration efforts</li> </ul>	<ul style="list-style-type: none"> <li>Supplier management and communication ensure fair opportunity and responsible practices, as well as strict adherence to our Supplier Code of Conduct</li> <li>Utilised CompPASS, our procurement software, to manage suppliers, improve processes and ensure compliance on ESG matters</li> </ul>
<b>REGULATORS</b> 	<ul style="list-style-type: none"> <li>Regular dialogue sessions and/or reporting to the Singapore Exchange ("SGX"), and the various land transport authorities, environmental agencies, manpower ministries and energy regulators, across Singapore, Australia, UK &amp; Ireland, China, New Zealand and Malaysia.</li> </ul>	<ul style="list-style-type: none"> <li>Throughout the year</li> </ul>	<ul style="list-style-type: none"> <li>Climate change adaptation and mitigation</li> <li>Diversity and inclusion</li> <li>Sector development</li> <li>Ethical and transparent business</li> </ul>	<ul style="list-style-type: none"> <li>Review operational, safety and security performances</li> <li>Provide constructive feedback when regulator needs to review existing and implement new policies</li> <li>Reliable partner to explore and trial new systems</li> <li>Identify and implement initiatives to cut carbon emissions</li> <li>Discuss manpower and infrastructural development and sustainability issues</li> </ul>

13 Refer to our [Supplier Code of Conduct](#) for more information.

## OUR APPROACH TO SUSTAINABILITY

### GOVERNING OUR SUSTAINABILITY AND RISK

An established governance framework minimises our ESG risks and ensures opportunities are capitalised on, promoting long-term and sustainable growth within our organisation.

### SUSTAINABILITY GOVERNANCE STRUCTURE

Our Sustainability Committee ("SC"), established in April 2021 and chaired by Ms Jessica Cheam, is responsible for maintaining oversight on ComfortDelGro's sustainability ambitions, strategies and performance. The efforts of the SC are supported by our Chairman, Mr Lim Jit Poh, who is also a member of the committee.

ESG matters are deliberated by the Board level SC at least every quarter to ensure proper management of the impacts on the economy, environment, and people. The SC members are appointed based on their expertise and knowledge in sustainability matters, in relation to environment, social and governance; with access to expert advice through external consultants.

ESG matters are further communicated to the Board by the SC on a quarterly basis. These quarterly Board meetings involve active discussions in the development of strategies or policies on how ComfortDelGro can better manage the impacts on the economy, environment, and people including due diligence processes. Significant concerns or feedback from the SC are raised to the Board. Subsequently, quarterly reviews are conducted to approve and update any new developments and policies.

The SC members are appointed by the Board. Each Director is subject to rotational reappointment in accordance with the Company's Constitution. The appointment of SC member terminates when the member ceases to be a Director or as determined by the Board. Like other Board Committees, the members of the SC may be rotated for new members to provide fresh perspectives and constructive debates to enhance the Board's ability to drive sustainability issues across the Group.

Similarly, our Management Sustainability Committee, overseen by the SC, is chaired by our MD/Group CEO Mr Cheng Siak Kian, and comprises key members of the Senior Management. This Committee reviews, reports, and assesses ComfortDelGro's sustainability performance against the targets established by the Board, on a quarterly basis.

Sustainability is part of the Group Corporate Affairs Division, led by the Group Chief Corporate Affairs Officer, Ms Tammy Tan. Our Group Chief Sustainability Officer, Mr Jonathan Jong, oversees all ESG related matters. He is supported by the ESG Working Groups, which assess and

review ESG progress, identifying potential sustainability initiatives for implementation across the Group and its Business Units.

The Board works closely with senior management and is actively involved in developing ComfortDelGro's sustainability framework, strategies, policies, ESG targets, ESG risk management and impact management frameworks among other sustainability related issues. Furthermore, ESG factors have been integrated into executive compensation, driving positive ESG outcomes that benefit both shareholders and stakeholders. Board members are also expected to exercise independent judgement and good faith in the best interest of the company and its stakeholders.

The Board is responsible for reviewing and approving ComfortDelGro's sustainability report which includes our materiality assessment annually. The senior management, supported by our external consultant, performed an in-depth materiality exercise in accordance with GRI 2021 requirements and held internal board meetings to validate the prioritisation of material topics for 2022. The validation of material topics with the Board was also undertaken by two of our listed subsidiaries – SBS Transit Ltd and VICOM Ltd, and their results were also taken into consideration. As a result of the validation process, the senior management across each subsidiary subsequently submitted to our Board their list of material topics, informing ComfortDelGro's final ESG material topics.

To ensure good corporate governance, our board and sustainability committee must avoid situations where their own personal or business interests may conflict or appear to conflict with the interests of the Group. Where a Director has a conflict of interest, or it appears that he/she might have a conflict of interest in relation to any matter, they must immediately declare his/her interest at a meeting of the Directors, or by giving written notice to the Company and recuse himself/herself from participating in the discussion or any decision-making.

The Board is evaluated annually via Board Performance Evaluation Forms, which are facilitated by the Company Secretary. Through the questionnaire, the Board's is assessed on its performance in overseeing the management of ComfortDelGro's impacts on the economy, environment, people, and also how well the Group's ESG strategies, sustainability developments, policies, and commitment are managed. Every year, one third of the Board of Directors, particularly, those who have served longest since their last re-election, will step down and stand for re-election at the Annual General Meeting ("AGM"). In addition, newly appointed directors will also step down at their first AGM since their appointment and stand for re-election.

## OUR APPROACH TO SUSTAINABILITY

### BOARD INDEPENDENCE

At ComfortDelGro, we expect our Board members to exercise independent judgment during decision making processes to enable the best business outcomes. Across the Board, our members prioritise the business success of ComfortDelGro whilst embodying integrity, professionalism, ethical behaviour, and the consideration of enhancing our sustainability journey in the execution of their duties.

To enforce an ethical business practice across the geographies in which we operate, the Board regularly reviews the Company's business strategy, sustainability efforts and ambitions with Senior Management. Similarly, our Senior Management is also tasked with maintaining oversight on ESG issues, performance, and reporting.

The roles and responsibilities of the Board entail:

- Driving strategic objectives and direction with adequate emphasis on sustainability, innovation, and value creation for ComfortDelGro by exercising enterprising leadership and guidance. Additionally, the Chairman must ensure sufficient human and financial resources available to attain these objectives.
- Aiding in the development of financial authority limits and relevant risk management and control systems, whilst balancing between organisational performance and ComfortDelGro's risk appetite to protect the company and stakeholders against potential risks.
- Monitoring and managing organisational performance whilst identifying appropriate areas for improvement.
- Determining relevant key stakeholders and ensuring their concerns are addressed in ComfortDelGro's strategies and management processes, whilst prioritising transparency and accountability.

- Enforcing ComfortDelGro's values, standards, policies, and procedures, whilst fostering an ethical corporate culture.
- Ensuring environmental, social and governance considerations are considered in the formulation and deployment of sustainability strategies.
- Ensuring full participation of directors on sustainability trainings

To uphold strong corporate governance, ComfortDelGro also maintains oversight on executive compensation to drive positive outcomes benefiting all stakeholders, whilst aptly rewarding the tenure of our executives.

We also have other Board Committees to aid the Board in their decision-making and execution of sustainability duties. The Committees are as follows:

- Audit and Risk Committee ("ARC")
- Nominating and Remuneration Committee ("NRC")
- Investment Committee ("IC")
- Digitalisation Committee ("DC")
- Sustainability Committee ("SC")

As part of the Board succession plan, potential candidates may be identified from time to time for appointment to the Board after the NRC evaluates and assesses their suitability in strengthening the diversity of skills, experience, age, gender, knowledge and relevant core competencies of the Board, whilst ensuring that there is a balanced tripartism experience from government, labour and business to avoid unproductive group-think and bias.

More information on our corporate governance and risk management can be found on pages 75 to 102 and 108 to 115 in the ComfortDelGro [Annual Report 2022](#).

BOARD COMPOSITION	
Percentage of independent non-executive director	90%
Percentage of non-independent and non-executive director	N/A
Percentage of non-independent and executive director	10%
BOARD DIVERSITY	
Women	30%
Men	70%
DIRECTORS' LENGTH OF SERVICE	
Served > 9 years	20%
Served < 9 years	80%
MANAGEMENT DIVERSITY <sup>14</sup>	
Women	26%
Men	74%

14 Management is defined as employees that operate at managerial level and above.

## OUR APPROACH TO SUSTAINABILITY

### CORPORATE GOVERNANCE AND RISK

Our wider governance framework is aligned to the governance policies and practices set out in the Code of Corporate Governance issued by the Monetary Authority of Singapore (“MAS”) on 6 August 2018. A robust Enterprise Risk Management Framework has been implemented to assist in understanding the complexities of risk and opportunities arising from our operations. This process standardises and provides a methodological approach in the identification, assessment, and evaluation of risks, ultimately aiding in its management and effective prioritisation of resources.

We adopt the precautionary principle in our risk management approaches. As a signatory of the UNGC, we are committed to the ten principles of Human Rights, Labour, Environment and Anti-corruption. More information on our corporate governance and risk management can be found on pages 75 to 102 and 108 to 115 in the ComfortDelGro [Annual Report 2022](#).

### BOARD CAPABILITIES AND MANAGEMENT

To ensure that our Board has the relevant experience and knowledge on sustainable development, all Board of Directors attended a one-time training on sustainability in

2022. The training covered the impact and implications of ESG developments on business, how companies can drive value creation through ESG, TCFD recommendations, SGX requirements on sustainability and climate-related risks reporting and board’s and director’s roles and responsibilities in driving sustainability compliance and strategy. More information on the competencies of the Board relevant to the impacts of the organisation can be found on pages 26 to 31 in the ComfortDelGro [Annual Report 2022](#).

ComfortDelGro acknowledges the importance of a skilled and dedicated workforce in growing our business and keeping abreast within an increasingly competitive and challenging environment. Our NRC plays a crucial role in retaining talented staff through management of the Group’s remuneration policies. They also oversee the Board and the committee’s performance in relation to the management of the organisation’s impacts on the economy, environment, and people.

Every year, we benchmark and review our remuneration policies, partnering an external consultant to conduct studies for the benchmarking of the total compensation of our talents and senior staff.

ANNUAL TOTAL COMPENSATION	
Annual total compensation of organisation’s highest paid individual	S\$2,679,201
Median annual total compensation for all employees in Singapore (excluding the highest-paid individual)	S\$66,070
Ratio of highest paid: median value	40.6

### LOOKING FORWARD

ComfortDelGro has established the following Board level targets:

- Maintain diversity and inclusion across the Board
- Maintain a minimum of 30% female representation on the Board

### MEMBERSHIP OF ASSOCIATIONS

ComfortDelGro is affiliated with the following memberships below:

- National Taxi Association
- National Transport Workers’ Union
- Singapore Low Carbon Network
- Singapore National Employers’ Federation
- Singapore Mediation Centre Tripartite Alliance for Fair & Progressive Employment Practices
- United Nations Global Compact
- World Business Council for Sustainable Development

### SGX DISCLOSURE REQUIREMENT: LIST OF RELEVANT CERTIFICATES

- ISO 45001 - Occupational Health and Safety System Certifications
- ISO 9001 – Quality Management Systems
- ISO 50001 – Energy Management systems
- Eco-Office Certification
- BizSafe “Star” Certification





# ENVIRONMENT: ENABLING A CLIMATE- FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

AS A GLOBAL MOBILITY PROVIDER, COMFORTDELGRO IS COGNISANT OF ITS ROLE IN DRIVING CLIMATE ACTION. ALONGSIDE WITH OUR SUBSIDIARIES, ENVIRONMENTAL SUSTAINABILITY IS AT THE CORE OF OUR OPERATIONS. AS SUCH, WE STRIVE TO MINIMISE OUR ENVIRONMENTAL FOOTPRINT AND CREATE A CLIMATE-FRIENDLY TRANSPORT SYSTEM.



## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### CLIMATE CHANGE ADAPTATION AND MITIGATION

At ComfortDelGro, we play our part in the mitigation and adaptation of climate change by providing climate-friendly transport and sustainable mobility products and services.

#### WHY THIS MATTERS TO US

The transportation sector which is traditionally heavily reliant on fossil fuels, accounts for close to two-fifth of global GHG emissions<sup>15</sup>. ComfortDelGro actively contributes to the global transition towards a low-carbon economy by shifting its operations towards more efficient and greener transportation. As a large transport provider operating in seven countries, we are conscious of our environmental footprint and emissions. At the same time, we recognise that we are in a forefront position which gives us influence over society's transition towards cleaner energy transportation systems.

#### HOW WE MANAGE THIS

ComfortDelGro strives to reduce our environmental impact caused by emissions through various measures, policies, and initiatives. This includes, but is not limited to, measures taken to electrify our fleet, improve energy efficiency and invest in clean, renewable energy. In 2022, our emissions reduction targets have been validated by the SBTi, reflecting our firm commitment and our decarbonisation efforts in mitigating and adapting to climate change. These targets are consistent with the reductions required to limit global warming to 1.5°C above pre-industrial levels, the most ambitious goal of the Paris Agreement.

In July 2022, we published our inaugural TCFD report that identified the physical and transition climate risks and opportunities that are relevant to our businesses. In preparation of this report, a groupwide climate-risk assessment and climate-scenario analysis was undertaken to understand the physical and transition risks and opportunities presented by climate change, for the regions where ComfortDelGro's operations and assets are located. Using 2019 as the baseline year, the potential impacts of these risks and opportunities on ComfortDelGro were identified. As we continue to refine our understanding of risks and opportunities presented by climate change, we will strive to integrate them into ComfortDelGro's overarching sustainability strategy and implement this into the operations of respective business units for effective management of relevant climate-related risks and opportunities. For more information, please refer to our 2022 TCFD report [here](#).

This financial year, ComfortDelGro aims to enhance our TCFD disclosure by assessing our climate risks and opportunities in greater details. We are currently in the process of collecting and refining business unit specific and geographic specific climate data. This will be ready in our standalone TCFD report which will be released later in 2023. The following table summarises our TCFD findings and disclosures this year.



## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

TCFD RECOMMENDATIONS	SUMMARY OF DISCLOSURES
Governance	<p>ComfortDelGro has established a governance framework to manage our ESG risks and opportunities, with the Board of Directors taking overall responsibility in climate-related decision making. A Board level Sustainability Committee was formalised in April 2021 to provide Board oversight on sustainability-related strategic and investment decisions.</p> <p>The Management Sustainability Committee reviews ComfortDelGro’s sustainability performance against targets quarterly and reports to the Sustainability Committee and Board.</p> <p>Sustainability is part of the Group Corporate Affairs Division, led by the Group Chief Corporate Affairs Officer. ComfortDelGro’s Group Chief Sustainability Officer (“CSO”) is responsible for reporting climate-related issues, its targets and progress to the Board. The CSO also co-chairs the Environmental, Social and Governance Working Groups, which seeks to assess and review ESG progress, identifying potential sustainability initiatives for implementation across the Group and its Business Units.</p>
Strategy	<p>Assets and countries in scope: Singapore, Australia, the UK, Ireland, China</p> <p>Baseline year: 2019</p> <p>Time horizons for scenario analysis:</p> <ul style="list-style-type: none"> <li>• Short-term: up until 2030</li> <li>• Medium-term: 2030-2050</li> <li>• Long-term: 2050-2080</li> </ul> <p>Scenario explored:</p> <ul style="list-style-type: none"> <li>• 1.5°C warming</li> <li>• &gt; 3°C warming</li> </ul> <p>Transition risks:</p> <ul style="list-style-type: none"> <li>• Carbon pricing</li> <li>• Changing customer expectations</li> <li>• Low carbon economy transition policies &amp; regulations</li> <li>• Reputational risks</li> <li>• Technology shifts</li> </ul> <p>Physical risks:</p> <ul style="list-style-type: none"> <li>• Floods</li> <li>• Heatwaves</li> <li>• Storms and cyclones</li> <li>• Wildfires</li> <li>• Rising sea levels</li> <li>• Water scarcity</li> </ul> <p>Further information and detail on the preliminary climate assessment can be found in our TCFD Report 2022.</p>

## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

TCFD RECOMMENDATIONS	SUMMARY OF DISCLOSURES
Risk management	<p>ComfortDelGro's TCFD working group conducted the climate risk assessment that screens the most pertinent physical (chronic and acute) climate risks and transition risks applicable to each geography of operation, at a country level.</p> <p>We are planning to follow up by performing the climate risk assessment at the regional level and will disclose the processes for assessing the potential size and scope of the identified climate-related risks.</p> <p>The process to assess the climate-related risks is aligned to ComfortDelGro's enterprise risk management methodology and depending on the severity of the climate risks identified, these are then incorporated into the business' enterprise risk management frameworks and risk registers.</p>
Metrics and targets	<p>Based on our material topics, we have established key metrics to measure and monitor our environmental performance, including our Scope 1, 2 and 3 emissions. These can be found in this Sustainability Report.</p>





## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### OUR INITIATIVES

#### CLIMATE FRIENDLY MOBILITY

A cornerstone of our climate change adaptation and mitigation efforts is the phasing out of our Internal Combustion Engine ("ICE") vehicles and the introduction of hybrid or electric vehicles ("EV"). Since the validation of our emissions reduction targets by SBTi in 2022, we have been actively monitoring and engaging in initiatives to reduce our GHG emissions through our fleet transition to cleaner energy vehicles. To do so, we collaborate with vehicle manufacturers, fuel, and electricity providers to advance our clean vehicle technologies. In 2022, we achieved a 25.95% and 8.63% reduction in Scope 1 and Scope 2 emissions respectively, from the baseline year of 2019.

For our existing fleet of ICE vehicles, we ensure that they meet the latest standards or its equivalent – Euro 5 or higher so that the vehicles produce lower levels of harmful exhaust emissions such as nitrogen oxide, carbon monoxide, hydrocarbons, and particulate matter. This also results in improved fuel efficiencies as well as reduced air pollutants and GHG emissions.

In Singapore, bus routes under our private mobility services are optimised through an established Fleet Management System and route optimisation exercises are conducted on a regular basis. In the UK and Australia, our drivers are trained to employ telematics solutions to track route data to ensure the efficient optimisation of operations. In China, to further optimise fuel and reduce emissions, we employ route optimisation through car-hailing app and on-demand services that receives orders nearby and autonomously, to increase operational efficiencies.



#### SUSTAINABLE PRODUCTS AND SERVICES

ComfortDelGro collaborates and partners with peers and industry leaders to accelerate our climate action and push forward in our transition towards cleaner energy vehicles.

#### SMART MOBILITY EXPERIENCE CENTRE

- ComfortDelGro Bus is thrilled to launch Singapore's first Smart Mobility Experience Centre ("SMEC") at Nanyang Technological University, Singapore ("NTU") for its new fleet of electric buses.
- The SMEC is the first such centre open to members of the public. It is equipped with state-of-the-art systems that track real-time passenger ridership, location of the buses and associated GHG emissions.
- The interactive features of the SMEC are open to the public round the clock, and visitors can look forward to an engaging experience through touchscreen panels.



#### VEHICLE LEASING PROGRAMME

- In 2022, ComfortDelGro Rent-A-Car ("CRAC") became a proud partner of DHL and Singapore Airport Terminal Services ("SATS") through our vehicle leasing programme for electric Citroen e-Dispatch vans. This has marked the beginning of an exciting cleaner energy vehicle journey with our clientele.

**ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM**



**METROLINE PARTNERED WITH VOLVO BUS UK AND IRELAND TO PURCHASE 48 ZERO EMISSIONS SINGLE DECK BUSES, KNOWN AS THE VOLVO BZL ELECTRIC (“BZL”).**



**ELECTRIC BUSES**

- In 2022, ComfortDelGro Bus began their operation of Singapore’s largest electrified private bus fleet in the National University of Singapore (“NUS”) tender to provide shuttle bus services at its campus. The multi-year contract, which is valued at more than S\$30 million, is for the electrification of the University’s entire fleet of shuttle service buses.
- Metroline partnered with Volvo Bus UK and Ireland to purchase 48 zero emissions single deck buses, known as the Volvo BZL Electric (“BZL”), set for rollout in London in second half of 2023. Metroline has purchased 39 double-deck StreetDeck Electroliner battery-powered electric vehicle (“BEVs”) with Wrightbus in November 2022 to support zero emission bus services across London and Hertfordshire, increasing our BEV purchases by 87 in 2022.
- In November 2022, CDC commenced a Zero Emissions Bus Trial in Melbourne’s south-eastern suburbs, in partnership with the Victorian Department of Transport and industry leaders in April 2022.

- Metroline was Transport for London’s first bus partner to operate hydrogen buses and has since been operating a fleet of 20 hydrogen fuel cell double decker buses from 2021, which were the first of its kind in England.

**GREEN HYDROGEN PARTNERSHIP**

- CDC has entered into a Major Green Hydrogen Partnership with Australian sustainable energy and vehicle suppliers which would allow it to operate two hydrogen powered fuel cell electric buses in Geelong. CDC’s two fuel cell electric (“FCEV”) buses are scheduled to service customers from late 2023.





## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### OUR PERFORMANCE AND LOOKING FORWARD

#### OUR FLEET COMPOSITION AND TRANSITION PLAN

As one of the largest land transport companies in the world, ComfortDelGro has been working continuously towards decarbonisation, growing our global fleet of cleaner energy car fleet to 65% in 2022. To support the transition to EVs, we provide training to our drivers in the operation and technical aspects of the electric vehicle to ensure they are comfortable and safe to drive them.

With increasing reliance on EVs alongside Singapore's Green Plan 2030 of having 60,000 charging points nationwide, having the infrastructure and tools to run our electric taxi fleet is crucial. With this vision, ComfortDelGro Engineering installed its first direct current fast charging station at our head office in 2018. Building on these experiences, ComfortDelGro Engineering partnered ENGIE Southeast Asia under a consortium arrangement and won a contract to install and operate 481 charging stations under the pilot LTA-URA tender in 2021. With its consortium partner, a joint venture, ComfortDelGro ENGIE ("CDG ENGIE") was formed in 2021. In 2022, the joint venture and its parent companies won a second contract to install and operate another 4,509 charging points in a LTA-HDB large-scale tender.

SBS Transit, a subsidiary of ComfortDelGro, has begun to transition its operated fleet of buses to electric buses. As one of Singapore's largest public transport providers, they now operate 31 electric buses and 25 hybrid buses. SBS Transit has worked closely with the LTA to continuously increase the total number of electric buses in its fleet in accordance with LTA's target of ensuring that Singapore's entire fleet of public buses utilises cleaner energy by 2040.

In 2022, ComfortDelGro Bus began its services in the NUS and NTU campuses operating fully electric fleets of shuttle buses, making up the largest electrified private bus fleet in Singapore. The electric buses are wheelchair accessible and equipped with a telematics system that keeps track of the different aspects of the driving patterns, including the amount of time spent idling and turning

corners. Currently, we have 31 operational e-buses across NUS' campuses and 18 e-buses across NTU's campuses to serve the commuting needs of the two institutions. In collaboration with Sentosa Development Corporation, we aim to electrify all public transport within Sentosa Island by 2025. Towards the goal, we have successfully placed two operational city e-buses on trial within Sentosa in December 2022. ComfortDelGro Bus also supports the sustainability efforts of Singapore General Hospital's ("SGH") campus through the pilot use of an electric shuttle bus. Data of the bus will be collected over the 6-month trial to gain insights for the electrification of the whole shuttle bus fleet.

Metroline, our biggest bus operator in the UK, continues to move forward with the transition towards a climate-friendly fleet. The launch of the hydrogen buses by Metroline serves as testament to our commitment for more sustainable products and services. Metroline currently has 852 greener hybrid, electric and hydrogen buses, an increase of 23 buses from 2021. The remaining ICE vehicle in Metroline's fleet are all compliant with Euro 6 or Zero Emissions ("ZE") standards.

In Australia, CDC Victoria was the first public transport operator to implement automatic geofencing technology, and the largest hybrid bus fleet operator of the country. This technology aids in the delivery of enhanced environmental performance through reduced emissions and limited engine noise. As we allow hybrid buses to be programmed and operated in "electric only mode" within designated areas, such as near schools, shopping strips, hospitals, we are able to curb the noise pollution and our hybrid buses have shown a 30% reduction in nitrogen oxide and particulate emissions alongside a 30% reduction of fuel and carbon emissions.

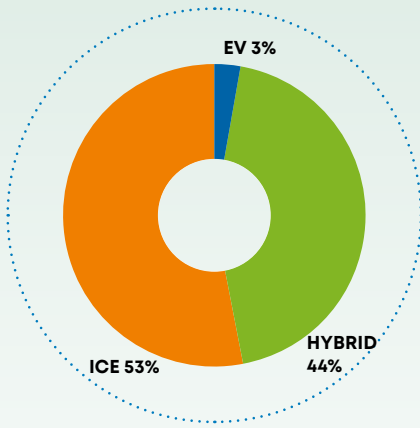
Similarly, our operations in China are on an ambitious transition towards a cleaner energy fleet of vehicles. In 2022, with the addition of over 900 EVs, we have transitioned 65% of our China taxi fleet to cleaner energy vehicles.



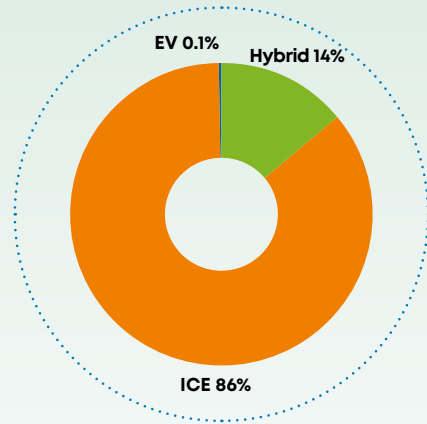
## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM



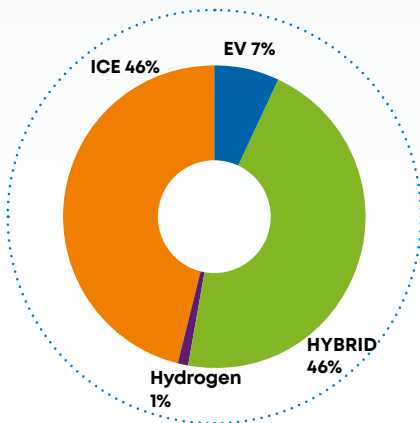
**SINGAPORE FLEET VEHICLES BY FUEL TYPE, 2022**



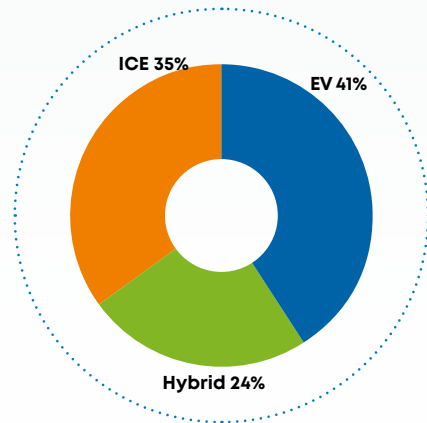
**AUSTRALIA FLEET VEHICLES BY FUEL TYPE, 2022**



**UK & IRELAND FLEET VEHICLES BY FUEL TYPE, 2022**



**CHINA FLEET VEHICLES BY FUEL TYPE, 2022**



■ HYBRID ■ ICE ■ EV ■ HYDROGEN

Moving forward, we aim to increase the rate by which we adopt cleaner and environmentally friendly vehicles globally. To do so, we will monitor and review our fleet transition plan regularly to account for the technological advances, regulatory requirements, and developments of commercially viable clean vehicles.



## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### EMISSIONS

As climate action is urgently demanded, decarbonising our operations to reduce our emissions and improve air quality is of fundamental importance at ComfortDelGro.

### WHY THIS MATTERS TO US

ComfortDelGro have committed to emissions reduction targets validated by the SBTi. As a transport operator, we are mindful of our impact on the environment from operating our fleet of vehicles. We have taken steps to reduce our GHG emissions and harmful air pollutants resulting from our business activities and operations.

### HOW WE MANAGE THIS

Aligning ourselves with the 1.5°C scenario, our decarbonisation plan outlines the targets and steps we need to take to reduce our Scope 1, 2 and 3 emissions. Our decarbonisation plan is shared throughout our business units through working group sharing, training webinars and newsletters relating to sustainability updates, achievements, and initiatives across the group.

### ACCOUNTING FOR SCOPE 1, 2 AND 3 GHG EMISSIONS

In 2022 we undertook a detailed assessment of our GHG inventory to include all of our operations under the operational control approach, in alignment with the GHG Protocol. Our scope of operations encompasses all our operations<sup>16</sup> in Singapore, Australia, the UK, China, Ireland and New Zealand.

While preparing for the submission to the SBTi last year, we established 2019 as our baseline year for GHG



calculations in order to capture a closer representation of our operations before the COVID-19 pandemic. All GHG emissions are calculated in carbon dioxide equivalents (CO<sub>2</sub>e), including the accounting and reporting of the six greenhouse gases covered by the Kyoto Protocol including methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) in the GHG Protocol.

The majority of our Scope 1 emissions are attributed to the tail-pipe emissions from our fleet. Our Scope 2 emissions primarily comprise our electricity consumption across our operations, including rail traction power. For our Scope 3 emissions, we undertook a preliminary screening exercise to determine which of the categories would be most pertinent to our emissions and operations. We then selected the most pertinent categories and undertook more detailed emissions calculations based on the requirements stated by the GHG Protocol. The Scope 3 categories that we addressed include:

SCOPE 3 CATEGORY	SCREENED OR CALCULATED
Category 1: Purchased goods & services	Calculated
Category 2: Capital goods	Calculated
Category 3: Fuel- and energy-related activities not included in Scope 1 & Scope 2	Calculated
Category 4: Upstream transportation and distribution	Screened
Category 6: Business travel	Calculated
Category 7: Employee commute	Screened
Category 8: Upstream leased assets	Calculated
Category 11: Use of sold products	Screened
Category 12: End-of-life treatment of sold products	Calculated
Category 15: Investments	Screened

16 Malaysia has been excluded in the calculation of our GHG inventory in 2022. Our GHG inventory includes carbon dioxide equivalent (CO<sub>2</sub>e) emitted by our own business vehicles.

## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### OUR PERFORMANCE AND LOOKING FORWARD

#### GREENHOUSE GAS EMISSIONS

GHG EMISSIONS (tCO <sub>2</sub> e) <sup>17</sup>	2019 (BASELINE YEAR)	2021	2022	% CHANGE FROM BASELINE YEAR 2019
Scope 1 (Direct emissions)	997,721	744,805	718,810	-25.87%
Scope 2 (Indirect emissions from electricity)	206,028	192,982	188,322	-8.63%
Scope 3 (All other indirect emissions)	645,038	550,095	494,545	-20.44%
Total Scope 1 + 2 emissions	1,203,749	937,787	907,132	-22.85%
Total Scope 1 + 2 + 3 emissions	1,848,787	1,487,882	1,401,677	-22.02%

#### SCOPE 3 EMISSIONS BREAKDOWN

CATEGORY <sup>18</sup>	EMISSIONS (tCO <sub>2</sub> e) 2019 (BASELINE YEAR)	SHARE OF TOTAL EMISSIONS	EMISSIONS (tCO <sub>2</sub> e) 2022	SHARE OF TOTAL EMISSIONS
Category 1: Purchased goods & services	95,329	14.78%	144,041	29.13%
Category 2: Capital goods	103,638	16.07%	64,053	12.95%
Category 3: Fuel and energy used not captured in Scope 1 and Scope 2	381,220	59.10%	197,975	40.03%
Category 4: Upstream transportation and distribution	14,976	2.32%	14,567	2.95%
Category 6: Business travel	154	0.02%	126	0.03%
Category 7: Employee commute	20,400	3.16%	20,400	4.13%
Category 8: Upstream leased assets	2,650	0.41%	N/A	N/A
Category 11: Use of sold products	23,389	3.63%	42,915	8.68%
Category 12: End-of-life treatment of sold products	39	0.01%	29	0.01%
Category 15: Investments	3,243	0.50%	10,439	2.11%

EMISSIONS INTENSITY (tCO <sub>2</sub> e/\$\$M REVENUE)	2019 (BASELINE YEAR)	2022	% CHANGE FROM BASELINE YEAR 2019
Scope 1 + 2	309	240	-22.39%
Scope 3	159	131	-17.91%

<sup>17</sup> All calculations are completed in accordance with the GHG Protocol, whereas our Scope 3 emissions were calculated using a mix of US EPA and DEFRA 2021 and 2022 emission factors.

<sup>18</sup> Through the process of SBTi submission and validation, as well as through our updated 2022 emissions exercise, emissions were redistributed within our Scope 3. These restatements have been captured in this report, particularly in Category 1 (Purchased Goods and Services), Category 2 (Capital Goods) and Category 8 (Upstream leased assets). This is due to improved data collection and refined methodologies.

## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### ENERGY AND FUELS

#### WHY THIS MATTERS TO US

We recognise that optimising our fuel and energy use and transitioning to cleaner fuels and energy is paramount to minimising the negative environmental impacts from our operations. We actively seek to improve energy and fuel efficiency in our operations through electrification of our fleets, investing and exploring opportunities in renewable energy such as solar power. In doing so, we hope to reap positive environmental and economic benefits for our company and those around us.

#### HOW WE MANAGE THIS

We actively manage our energy and fuels on two dimensions; firstly, the energy and fuel used by our vehicle fleet and secondly, fuels and energy used by our brick-and-mortar operations such as stations, depots, workshops, and offices.

In our stations, depots, and offices, we have implemented energy efficient designs and measures to reduce our energy and electricity usage. Our measures include:

- Eco-Office certification for our offices
- Energy saving escalators that reduce speed when not in use
- Energy efficient lighting (LEDs)
- Outdoor air supply regulation and carbon dioxide sensors
- Natural lighting at entrances
- Retrofitting and replacement of air-conditioning systems with energy-efficient alternatives

In efforts to achieve the Eco-Office certification by the SEC, we have established an Energy Management Policy and a Green Building User guide that provides our Singapore business units with the necessary guidance on energy management for our buildings and facilities, overseen by the Group Sustainability Office. We also continue to retrofit our offices based on the Building Construction Authority's ("BCA") Green Mark guidelines to ensure energy efficiency.

Tapping into renewable energy, we have installed solar power generation systems in some of our offices and

depots, and continue to explore opportunities to increase our solar generation capacity.

To improve fuel and driving efficiency, we have implemented the following solutions:

- New generation trains are designed with regenerative braking systems that store kinetic energy and reduce the wear and tear of mechanical brakes.
- Driver behavioural training such as proper acceleration and braking techniques, as well as switching off engines when stationary.

To effectively monitor the performance of our vehicles, fleets, and operations, we utilise our cloud-based management portal that tracks our energy performance on a real-time basis. With the portal, we are able to identify operations that have high energy consumption and engage the necessary Business Units to strategise on mitigation and reduction measures.

#### OUR PERFORMANCE AND LOOKING FORWARD

We have been increasing our renewable energy generation capacities at various sites of our operations, to support our decarbonisation aspirations. In 2022, our renewable energy generated grew more than 1.2 fold to 4,664,660 kWh from 2019. At the same time, our renewable energy generation capacity increase by 164% to 4.885 MWp from 2019.

In March 2022, ComfortDelGro Engineering and ENGIE Southeast Asia incorporated a second joint venture ComfortDelGro ENGIE Solar, to offer deployment of solar energy systems for commercial buildings. The strategic partnership is centred around the joint development and management of solar solutions as part of the Group's decarbonisation journey. This has propelled ComfortDelGro Engineering to install rooftop solar panels at its Loyang and Pandan sites.

Moving forward, we aim to:

- Increase solar PV output to 8 MWp by 2030
- Continue to investigate renewable energy options for adoption in our business





## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### FUEL TYPE

FUEL TYPE	2019 (BASELINE YEAR)	2020	2021	2022	% CHANGE FROM BASELINE YEAR OF 2019
Bio-blend diesel B20 (in litres)	–	–	34,016,891	32,297,101	N/A
Diesel (in litres)	331,332,976	252,762,130	217,276,303	207,793,438	-37.3%
Petrol (in litres)	32,658,433	33,264,997	38,830,319	40,017,809	22.5%
CNG (in m <sup>3</sup> )	15,051,082	15,813,088	22,698,690	25,937,804	72.3%

### ELECTRICITY CONSUMPTION

ENERGY TYPE	2019 (BASELINE YEAR)	2020	2021	2022	% CHANGE FROM BASELINE YEAR OF 2019
Electricity Purchased (kWh)	499,794,946	444,914,841	468,051,266	490,803,782	-1.8%
Renewable Electricity Generated (kWh)	2,063,690	1,743,025	2,393,358	4,664,660	126%

### ENERGY INTENSITY

ENERGY INTENSITY TYPE	2019 (BASELINE YEAR)	2020	2021 <sup>19</sup>	2022	% CHANGE FROM BASELINE YEAR OF 2019
Total Purchased Electricity Intensity (kWh/\$\$M Revenue)	128,116	137,209	132,281	129,815	1.3%



<sup>19</sup> Energy Intensity for 2021 was restated due to a restatement of revenue for 2021. Refer to ComfortDelGro [Annual Report 2022](#), page 24..

## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### RESOURCE STEWARDSHIP

Another key component of our environmental sustainability efforts is the responsible use of natural resources such as water; and the minimisation of waste and other harmful environmental impacts.

### WASTE

#### WHY THIS MATTERS TO US

With operations around the world, ComfortDelGro acknowledges its role in responsibly managing the resources used in our operations as well as the waste we generate.

Without effective end-of-life and waste management, it could cause negative implications to both human and environmental health. Thus, we take on measures and initiatives that help to reduce the impacts of our waste. As we move towards EVs, we also take into consideration the potential waste that EV batteries have and collaborate with like-minded companies to find innovative and practical solutions to managing our end-of-life cycle battery waste.

#### HOW WE MANAGE THIS

The waste at ComfortDelGro is primarily attributed to our day-to-day activities and commuter waste. In all our waste management processes, we comply with all waste-related regulations in each operational location. Our waste is handled by authorised contractors and other consumables such as batteries, engine oil and tyres are recycled or reused where possible.

For our offices, we work to better manage our waste by establishing better waste management systems. When our vehicles reach the end of their life cycle, our vehicles are scrapped and any recoverable materials are collected for reuse or recycling. Any hazardous waste generated in our operations such as the repair and maintenance of our vehicles are responsibly handled by specialist contractors.



In all regions of our operations, regulators and governments have established priorities and targets in the management of waste. Singapore's Waste Masterplan outlines its plan to increase overall recycling rate to 70% and reduce daily waste-to-landfill per capital by 30% by 2030. In the UK, they aim to recycle 65% of municipal waste and reduce the amount of waste sent to landfills to 10% by 2035.

ComfortDelGro engages in a number of waste initiatives to show our commitment to supporting these national waste strategies. Singapore's NEA Say Yes to Waste Less campaign is one such initiative that we have actively participated in in the last few years. This year marks the fourth year of our participation in this initiative, aiming to educate the community on reducing single-use disposables.

In our office premises, we have placed recycling bins for paper, plastic, and cans. We have also switched to digital tablets with our Bus Mobile Maintenance System ("BMMS") installed to reduce paper waste at our bus depots. The BMMS helps to promote efficiency of our bus operations as it enables our bus captains and technicians to complete checklists when completing maintenance works and access work instructions, drawings, and electrical schematics.

#### OUR PERFORMANCE AND LOOKING FORWARD

At ComfortDelGro's offices and workshops, we monitor, measure, and report our waste data in alignment with local regulations. In areas and operations of high consumption and generation of waste, initiatives to manage and reduce waste are identified and implemented accordingly.

In our efforts to inculcate responsible consumption within our company, we encourage our employees to adopt responsible waste disposal. Posters are put up on noticeboards, pantries and toilets to encourage responsible consumption of electricity and water, recycling and educate employees on responsible waste management. Our waste generated in 2022 increased by 60% from 2021 due to the inclusion of additional data by our subsidiary not reported previously.

Moving forward, we have set targets to continuously improve our waste management systems to reduce our footprint on the environment.

## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### WASTE GENERATED

TOTAL WASTE GENERATED (TONNES)	2019 (BASELINE YEAR)	2021 <sup>20</sup>	2022	% CHANGE FROM BASELINE YEAR 2019
Hazardous	3,446	3,984	4,525	31%
Non-Hazardous	3,599	4,327	6,753	88%
E-Waste	3	3	5	54%
Total	7,048	8,314	11,283	60%

### WASTE DIRECTED TO DISPOSAL

WASTE DIRECTED TO DISPOSAL (TONNES)	2019 (BASELINE YEAR)	2021	2022	% CHANGE FROM BASELINE YEAR 2019
<b>Hazardous Waste</b>				
Landfill	1,779	2,296	2,369	25%
Incineration	0	23	5	N/A
Total	1,779	2,318	2,374	25%
<b>Non-Hazardous Waste</b>				
Landfill	882	619	1,109	20%
Incineration	885	820	3,041	71%
Total	1,767	1,438	4,150	57%
<b>E-waste</b>				
Incineration	-	0.1	0.2	N/A
Total	-	0.1	0.2	N/A

### WASTE DIVERTED FROM DISPOSAL

WASTE DIVERTED FROM DISPOSAL (TONNES)	2019 (BASELINE YEAR)	2021	2022	% CHANGE FROM BASELINE YEAR 2019
<b>Hazardous Waste</b>				
Recycled	1,592	1,591	2,076	23%
Reused	75	75	76	2%
Total	1,667	1,666	2,152	23%
<b>Non-Hazardous Waste</b>				
Recycled	1,832	1,413	1,343	-36%
Reused	0	1,476	1,260	N/A
Total	1,832	2,889	2,603	30%
<b>E-waste</b>				
Recycled	-	1	2	N/A
Reused	-	1	2	N/A
Total	-	2	4	N/A

<sup>20</sup> Waste for 2021 was restated due to an improvement in our data collection methodologies, resulting in more accurate data being captured.



## ENVIRONMENT: ENABLING A CLIMATE-FRIENDLY AND SUSTAINABLE TRANSPORT SYSTEM

### WATER

#### WHY THIS MATTERS TO US

In our operations, the majority of our water consumption stems from the washing and maintenance of our taxis, cars, buses and trains to ensure the safety and hygiene for our commuters. Good management of our water consumption is important to us at ComfortDelGro.

#### HOW WE MANAGE THIS

We have put in measures to manage our water consumption in Singapore such as the use of reclaimed NEWater for non-potable uses such as vehicle washing, general office operational use, pantry use and lavatories, and recycle the water used for train and bus cleaning – our train and bus washing machines are equipped to collect, filter, and recycle approximately 80% of the water used in the washing process. We also continued to ensure efficient and responsible use of water through the replacement of our taps at the wash basins and toilet flushing systems and sprays with water efficient fittings for our office premises.

We work towards more efficient water management systems for our office premises through the relevant

green building certifications in the countries we operate in. For Singapore, we align ourselves with the Singapore Environmental Council by obtaining Eco-Office certification for our office premises where possible. We will also be looking into obtaining equivalent office building certifications for the rest of our global operations.

#### OUR PERFORMANCE AND LOOKING FORWARD

As a result of our water saving measures and initiatives ComfortDelGro's water consumption fell by 18% in 2022 as compared to 2021. In 2022, over 60% of our offices in Singapore received the Eco-Office certification, including 6 office premises improving on the award tier due to energy efficiency measures and better waste and water management.

Moving forward, ComfortDelGro has set targets to consistently enhance our resource stewardship through our targets for office buildings. We aim for 50% of all office buildings globally to be environmentally friendly (i.e. Eco-Office certified or their equivalent) by 2030, and 100% by 2050. We will also continuously improve our water management practices to reduce our footprint on the environment.

#### WATER WITHDRAWAL

TOTAL WATER WITHDRAWN BY SOURCE (MEGALITRES)	2019 (BASELINE YEAR)	2020	2021 <sup>21</sup>	2022	% CHANGE FROM BASELINE 2019
Utilities (Municipal)	2,271	1,833	1,983	1,447	-36%
Utilities (SG:NEWater)	30	42	97	87	190%
Rainwater	0.8	1	2	19	2,279%
Groundwater <sup>22</sup>	–	–	429	634	N/A
Total	2,302	1,876	2,510	2,188	-5%

#### WATER CONSUMPTION

TOTAL WATER CONSUMPTION	2019 (BASELINE YEAR)	2020	2021	2022	% CHANGE FROM BASELINE 2019
Total Water Consumption (Megalitres)	2,302	1,876	2,510	2,188	-5%

#### WATER INTENSITY

WATER INTENSITY	2019 (BASELINE YEAR)	2020	2021 <sup>23</sup>	2022	% CHANGE FROM BASELINE 2019
Total Water Consumption Intensity (Megalitres/\$\$M Revenue)	0.591	0.578	0.717	0.579	-2%

<sup>21</sup> Water for 2021 was restated due to an improvement in our data collection methodologies, resulting in more accurate data being captured.

<sup>22</sup> Groundwater for 2022 increased by 32% from 2021 due to the inclusion of additional data by our subsidiary not reported previously.

<sup>23</sup> Water Intensity for 2021 was restated due to a restatement of revenue for 2021. Refer to ComfortDelGro [Annual Report 2022](#), page 24.

# SOCIAL: SAFEGUARDING

## THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

AS A MULTI-MODAL MOBILITY OPERATOR SPANNING DIFFERENT COUNTRIES, WE UNDERSTAND OUR ROLE AS A KEY TOUCHPOINT ACROSS MANY STAKEHOLDERS, IN PARTICULAR, OUR CUSTOMERS AND EMPLOYEES. COMFORTDELGRO STRIVES TO SAFEGUARD THE SAFETY OF OUR CUSTOMERS AND EMPLOYEES AS WELL AS IMPROVE THE MENTAL, PHYSICAL, AND EMOTIONAL WELL-BEING OF OUR PEOPLE THROUGH VARIOUS INITIATIVES AND MEASURES. IT IS OUR BELIEF THAT THIS HELPS TO BRING ABOUT EXCELLENCE IN CUSTOMER EXPERIENCE AND A HEALTHY, FULFILLED AND EFFICIENT WORKFORCE.



## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### HEALTH AND SAFETY

#### WHY THIS MATTER TO US

Ensuring the safety and health of over 22,000 employees is central to our business. We enforce a safety-first thinking that extends beyond our customers and employees to other road users.

#### HOW WE MANAGE THIS

##### OCCUPATIONAL HEALTH AND SAFETY

ComfortDelGro's Occupational Health and Safety ("OHS") systems are in line with regulatory requirements and internationally recognised safety standards such as ISO 14001, ISO 45001, ISO 9001, ISO 4801, ISO 50001 and AS/NZ4801. These standards help to set out the processes and procedures ComfortDelGro should adopt in the identification, assessment and management of health and safety risks in the workplace. All employees, vendors, contractors, and operators that work and operate within our premises are covered by our OHS management systems and policies.

To prevent and mitigate hazards and risks, hazard identification and risk assessments are conducted regularly. Annual detailed risk assessments and independent physical inspections are undertaken as pre-emptive measures to identify any risks and hazards that could have a negative impact on our workers.

To foster a culture of safety, we have regular safety awareness programmes and training courses that run throughout the year. For example, two of our Singapore subsidiaries – SBS Transit and VICOM Group, have specific trainings for their workers on Occupational Health and Safety. The training at SBS Transit and VICOM is performed in accordance with regulations and is provided by accredited training agencies. Our SETSCO staff are similarly required to attend safety training, orientations, and site familiarisation for specialised clients in the shipyard, marine, construction, and oil/petrochemical sectors.

In 2022, following the issuance of the Singapore Code of Practice on Chief Executives' and Board of Directors' Workplace Safety and Health ("WSH") Duties, the Group reviewed its work procedures and processes to ensure that its safety policies, standards and practices comply with the Workplace Safety and Health Act 2006. All Singapore business units complied with the Safety Time Out ("STO") requirement by Singapore's Ministry of Manpower and completed the STO checklist. We will continue to equip our employees with the right health and safety knowledge through training including drills, as well as enhance our safety and security equipment and tools.

Our third-party suppliers and contractors are provided with our worker and contractor safety measures through the Contractor Induction Packages, Supplier Agreements



and Tender Documents. These documents are provided prior to the commencement of any work. Additionally, all our global operations undergo a due diligence process that ensures all third-party business partners are furnished with the necessary licenses and documentation that is aligned with our standards and expectations for Occupational Health and Safety ("OHS"). ComfortDelGro Taxi vendors are required to have a Method Statement and Risk Assessment that is reviewed and approved by our Safety Officers prior to any commencement of work. For our Australia operations, we require our vendors to complete induction programmes to guarantee full compliance with ComfortDelGro's OHS standards and expectations.

As means of evaluating and improving our OHS programmes, ComfortDelGro established a joint management-worker Workplace Safety and Health ("WSH") Committee to represent our employee and workers, and their interests in OHS. The WSH Committees meet regularly to conduct evaluations and assessments of our OHS management system and develop appropriate and mitigating solutions when needed. The micro-level and day-to-day OHS matters are also on the purview of the WSH Committees.

The importance of safeguarding OHS on an operational and managerial level is extended to our employees. We empower our employees and workers to report any work-related hazards, without the fear of reprisals. We do so to instil a strong emphasis on health and safety and to ensure our workforce know that ComfortDelGro puts their health and safety first. Employees who wish to report incidents or hazards can do so to their supervisors, their WSH committee representatives or anonymously through whistleblowing channels. For example, our Australia operations are equipped with a company mobile application and workplace kiosk where they can report incidents, risks, and potential hazards. Additionally, we have a Whistleblowing Policy<sup>24</sup> as a safeguard against any adverse actions on employees who raise hazardous concerns.

24 Refer to our [Whistleblowing Policy](#) for more information.

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

In the event of unsafe work circumstances or dangerous situations, all employees are reminded to remove themselves from the situation. For instance, Australia's national legislations stipulates a worker's right to cease work if there is reasonable concern to an exposed to health and safety risk. In the same vein, our trained Health and Safety Representatives are given full authority to issue stop-work notices in situations that are deemed unsafe and to take the mitigating and necessary steps before the resumption of work.

All incidents and breaches of OHS conduct are reported to management. They are then investigated, and corrective actions are implemented to eliminate or minimise the hazard. In the process of the investigation, OHS incidents are analysed to assess whether they are systemic issues or events that can be address through additional training or a change or procedures.

In our Singapore operations, health facilities and support services such as annual and routine health screening are provided, and first aid kits and Automated External Defibrillator ("AEDs") are made available around our premises. An example is SBS Transit's bus interchanges, terminals and train stations, where all locations are made equipped with AEDs, allowing for quick access to the device in life threatening situations. In addition, some of our ComfortDelGro taxis and buses have been equipped with AEDs from 2021, in order for their drivers to be first responders in cases of medical emergencies.

For employees who work from home, we regularly engage with them to ensure their health and well-being through

well-being talks and seminars that were held on topics such as exercise, health issues, diet, and mental health on a bi-monthly basis.

### OUR PERFORMANCE AND LOOKING FORWARD

In 2022, ComfortDelGro recorded three fatal employee workplace incidents across the Group – two in Australia and one in Singapore.

The incident in Queensland, Australia involved two mechanics, the details of which are still under investigation by the Work Health and Safety regulators. CDC Australia has consistently had a programme of controls in place to ensure workplace safety and health for all staff and third parties. Nevertheless, we conducted a thorough review of our Health and Safety approach and where applicable, made enhancements to our Health and Safety systems.

The incident in Singapore involved a bus captain, where the bus mounted the pavement and collided onto a tree. The incident is still under investigation by regulators, and the cause of the incident is yet to be determined. Following the incident, safety time-out sessions were effected to heighten the vigilance, safety advisories were issued to all bus captains for the awareness, and accident prevention pointers were reiterated.

There was also one fatal non-employee workplace incident recorded in Singapore, involving a tow truck driver not employed by ComfortDelGro, at a bus-parking facility leased by ComfortDelGro Bus to park its disused buses.

### WORK-RELATED INJURY

WORK-RELATED INJURIES (SGX OHS IN NUMBER OF CASES)	FOR ALL EMPLOYEES OF COMFORTDELGRO GROUP	FOR WORKERS WHO ARE NOT EMPLOYEES BUT WHOSE WORK AND/OR WORKPLACE IS CONTROLLED BY THE ORGANISATION
Number of fatalities from work-related injuries	3	1
Number of high-consequence work-related injuries	3	0
Number of recordable work-related injuries	191	4
Main types of work-related injury	Slips, trips, fall, traffic accidents	
Number of hours worked	50,348,227	3,050,325

### RATE OF WORK-RELATED INJURIES PER 1,000,000 MAN HOURS WORKED<sup>25</sup>

WORK-RELATED INJURIES (SGX OHS IN NUMBER OF CASES)	FOR ALL EMPLOYEES OF COMFORTDELGRO GROUP	FOR WORKERS WHO ARE NOT EMPLOYEES BUT WHOSE WORK AND/OR WORKPLACE IS CONTROLLED BY THE ORGANISATION
Rate of fatalities from work-related injuries	0.06	0.33
Rate of high-consequence work-related injuries	0.06	0.00
Rate of recordable work-related injuries	3.79	1.31

<sup>25</sup> The calculation of the rates of work-related injuries is based on the formula of (number of work-related injuries / numbers of man hours per region) x 1,000,000 man hours worked.

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### WORK-RELATED INJURY – BY REGIONS<sup>26</sup>

RECORDABLE WORK-RELATED INJURY	2020		2021		2022	
	NUMBER	RATE	NUMBER	RATE	NUMBER	RATE
Singapore	73	2.1	90	1.6	52	1.6
UK & Ireland	35	3.0	19	1.5	31	3.4
Australia	39	13.0	76	10.2	108	13.1
China	Not recorded		5	1.4	0	0.0

### WORKPLACE INJURY RATE (“WIR”) PER 100,000 EMPLOYED PERSONS<sup>27</sup> – BY REGIONS

WIR PER 100,000 EMPLOYEES	2020	2021	2022
Singapore	455.1	714.0	408.0
UK & Ireland	616.2	356.7	618.6
Australia	1,008.8	1,929.4	2,700.0
China	– <sup>28</sup>	738.6	0.0

### WORK-RELATED ILL HEALTH

WORK-RELATED ILL HEALTH	FOR ALL EMPLOYEES OF COMFORTDELGRO GROUP	
	WORK-RELATED ILL HEALTH	WORK-RELATED ILL HEALTH
Number of fatalities from work-related ill-health	0	0
Number of recordable work-related ill-health	13	0
Main types of work-related ill-health	Musculoskeletal, non-specific injuries <sup>29</sup>	

### ACCIDENT & SAFETY MANAGEMENT<sup>30</sup>

ACCIDENT & SAFETY MANAGEMENT	TOTAL RECORDABLE INCIDENT RATE (“TRIR”)	TOTAL FATALITY RATE
Direct employees	0.81	0.01
Contract employees	0.00	0.00

The WIR for Singapore falls below the 439.9 per 100,000 employed persons on Fatal, Major and Minor Injury rate for the Transportation and Storage industry, published in the Workplace Safety and Health Report 2021 by the Singapore Ministry of Manpower. The WIR for the UK & Ireland falls below the 1,650 per 100,000 employed persons for all industries, published in the annual Labour Force Survey 2019/2020 – 2021/2022 by The Health and Safety Executive. China had no recordable work-related injuries for 2022. The WIR for Australia shows an increasing trend, attributed to an increase in severe weather events and a return to pre-pandemic rostering. Australia also has a “no-fault” system of workers’ compensation for work-related injuries and benefit systems which indirectly led to relatively high workplace injury reports and long medical leaves. 47% of reported events related to body stressing (musculoskeletal injuries) and a further 21% of reported events related to trips, slips and falls. This will be a focus of attention for management in the year ahead.

ComfortDelGro strongly emphasises health and safety in our workplace, and consistently communicate our measures and expectations through training, education and instilling a safety culture.

<sup>26</sup> The calculation of recordable work-related injury rates is based on the formula of (number of recordable work-related injuries/ number of man hours per region) x 1,000,000 man hours worked.

<sup>27</sup> The calculation of Workplace Injury Rate (WIR) per 100,000 employed persons is based on the formula of (number of recordable work-related injuries/ numbers of employees per region) x 100,000.

<sup>28</sup> China’s WIR prior to 2021 is not available.

<sup>29</sup> These injuries were mainly due to body stressing and slips, trips and falls.

<sup>30</sup> The calculation of total recordable incident rate is based on the formula of (number of total recordable incidents x 200,000)/ man hours worked. The calculation of total fatality rate is based on the formula of (number of total fatality x 200,000)/ man hours worked.



## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### PUBLIC HEALTH AND SAFETY

#### WHY THIS MATTERS TO US

As a transport service provider with a fleet of approximately 30,500 vehicles, safeguarding our commuters and customers is undoubtedly one of our key priorities. With multiple ComfortDelGro entities providing public transport services, ensuring a clean track record of providing safe and reliable transportation lies at the heart of our services. We enforce a safety-first thinking that extends beyond our customers and employees to other road users.

#### HOW WE MANAGE THIS

In Singapore, beyond the training provided to our bus captains at SBS Transit, we have implemented several initiatives and measures to safeguard the journey of our commuters. Goldeneye is a fatigue monitoring system that helps our bus drivers stay alert and focused while on the road, through the use of machine vision technology. It detects signs of fatigue and distraction, and provides real-time feedback to the drivers through audio, visual and haptic alerts. At SBS Transit, we have also invested in innovative technology such as artificial intelligence to further prevent and mitigate accidents on the road.

ComfortDelGro buses are also equipped with a Driver Support System with a built-in Collision Warning & Emergency Brake ("CWEB") that helps to initiate the brakes if our bus drivers do not respond to warning in time. This safety enhancement feature helps our bus drivers avoid critical situations and accidents. Moreover, all our drivers at ComfortDelGro have undergone training on the CWEB feature. To adhere to travelling and speed limits, a Vehicle-Activated Speed Display ("VASD") system is installed on our buses to provide instant feedback to bus captains. Last year, we also included a blinker light sensor system that alerts oncoming buses or other reversing buses on buses reversing out of parking lots.

SBS Transit has also rolled out a number of initiatives as part of the Travel with Confidence programme such as the, 'Travel Buddy' initiative, which assists passengers with disabilities to travel on our public transport networks with confidence. This initiative allocates a 'travel buddy' to passengers with disabilities to guide them on their journeys, helping them navigate our public transport services. SBS Transit has also initiated other measures, initiatives, and collaborations with social service agencies to safeguard the safety of our commuters – in particular, people with disabilities or the elderly. For instance,



partnerships, such as those with Dementia Singapore, aid people with dementia in finding their way around bus interchanges and MRT stations with ease through the use of stickers or colourful murals. AEDs are also available in all our bus interchanges and train stations.

In our ComfortDelGro Driving Centre, we have established more barriers to prevent people from entering our training circuit and to better direct human traffic. We have also repainted our training circuit road markings and warning visual indicators, as well as added AEDs to each floor of our main building to ensure public safety on site.

ComfortDelGro also continued our efforts to promote public health and safety during the pandemic outbreak. As such, in recognition of our services, in 2022, National Patient Transport ("NPT"), a national provider of non-emergency patient transport and a subsidiary of CDC, was presented with the NSW Premier's Award in Recovery and Resilience for its COVID-19 discharge shuttle service. Our NPT operated its service 24 hours a day, seven days a week, ferrying COVID-19 patients discharged from hospitals to their homes. In doing so, NPT and by extension – ComfortDelGro, were able to play our parts in enhancing the well-being of the community during the pandemic. In light of this, CDC Victoria was also subsequently shortlisted as a finalist for both the Victorian Chamber of Commerce COVID Resilience Award and the Victorian WorkSafe Award 2022. We also established a SafeWork Month which included our focus on frequent bus checks ensuring no people or belongings have left on bus at each last ride.

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### OUR PERFORMANCE AND LOOKING FORWARD

ComfortDelGro aims to continue to enhance our customer safety and health measures to provide transport services that is reliable and safe for all our commuters. We conducted assessments of the health and safety impacts of all our product and service categories. In 2022, there were no incidents of non-compliance with regulations or voluntary codes related to health and safety, resulting in any fines, penalties or warnings. Going forward, we continue to track and monitor our number of road accidents and incidents.

ASSESSMENT OF THE HEALTH AND SAFETY IMPACTS OF PRODUCT AND SERVICE CATEGORIES	SINGAPORE	UK & IRELAND	AUSTRALIA	CHINA
Percentage of significant product and service categories which health and safety impacts are assessed for improvement	100%	100%	100%	100%

HEALTH AND SAFETY IMPACTS OF PRODUCTS AND SERVICES	2022
Incidents of non-compliance with regulations resulting in fine or penalty	0
Incidents of non-compliance with regulations in a warning	0
Incidents of non-compliance with voluntary codes	0

ACCIDENT & SAFETY MANAGEMENT	SINGAPORE	UK & IRELAND	AUSTRALIA	CHINA	TOTAL
Aggregate number of road accidents and incident	6,988	2,380	3,146	1,620	14,134





## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### OUR PEOPLE

#### WHY THIS MATTERS TO US

At ComfortDelGro, our people are essential to our growth and success, with growing our talent base one of our key priorities. Our employees form the core of our operations and play a vital role in delivering continued quality service while allowing us to connect people. While the landscape of the working environment continues to change, our commitment to our employees remains steadfast. We remain wholly committed to upholding fair labour and human rights whilst paving the pathway for professional development, employee engagement and enhancement of our employees' overall well-being.

#### HOW WE MANAGE THIS

We foster a people culture with the right mindset, skills, and competencies for the next phase of growth. We take an inclusive approach to develop leaders at all levels in a systematic way, providing a challenging and conducive environment that promotes continuous learning and teamwork. In tandem with developing our talent base,

we are committed to providing ample opportunities for the growth of our people to reach their full potential. We also actively position ourselves as an inclusive, preferred employer through branding and recruiting talents through internship conversions and WorkStudy Programmes.

We demonstrate care for the well-being of our employees through active, consistent, and constructive two-way engagement with our staff. In doing so, we hope to retain top talent while upgrading the skills of our employees, thereby driving positive business growth and enhancing service quality over the long run.

Maintaining active and continuous dialogue with our employees also allows us to align them with our business goals and strategy across our operations, whilst simultaneously creating opportunities to be proactive in addressing their concerns and aspirations. We uphold the spirit of Tripartism and work hard to establish and maintain positive relationships with trade unions and their representatives.



## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### HUMAN AND LABOUR RIGHTS

A foundational element of how ComfortDelGro manages its employees and operations involves a focus on upholding human and labour rights. We do not tolerate unethical labour practices such as child labour or forced labour, and strive to uphold all the relevant local, national, and international laws and conventions where we operate in. Measures are also set in place to ensure no unethical labour practices exist within the Group.

At ComfortDelGro, we maintain a tripartite Labour-Management relationship, underpinned by a harmonious relationship between ourselves, our employees, and Unions. The tripartite Labour-Management relationship shares a common vision and goal of consistent improvements in ensuring employee welfare. We work closely with Union representatives, who act as a vital tether between the organisation and workers, and we are able to maintain open communication and the timely addressing of key needs for the betterment of our workforce. In Singapore, we are committed to the Tripartite Guidelines for Fair Employment Practices

released by Tripartite Alliance for Fair and Progressive Employment Practices ("TAFEP"). We adhere to applicable employment related legislation and guidelines in the locations where we operate. Our working hours are in accordance with the applicable legislation in the locations where our employees work.

We also have an established Human Rights Policy<sup>31</sup>, detailing the actions and responses undertaken to ensure the fortification of employee human rights across all operations within the ComfortDelGro Group. ComfortDelGro's Human Rights Policy details our obligation to fair employment practices, ethical labour practices, freedom of association and right to collective bargaining, fair and safe working conditions, as well as diversity and inclusion, and growing our people. Our 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.

### OUR PERFORMANCE AND LOOKING FORWARD

SINGAPORE	2021	2022	% CHANGE
Total number of employees	12,605	12,744	1.10%
Total New Hires	1,522	2,054	34.95%
New Hires (%)	12.07%	16.12%	-
Total Turnover	2,200	2,014	-8.45%
Total turnover (%)	17.45%	15.80%	-

UK & IRELAND	2021	2022	% CHANGE
Total number of employees	5,327	5,011	-5.93%
Total New Hires	598	366	-38.80%
New Hires (%)	11.23%	7.30%	-
Total Turnover	1,066	682	-36.02%
Total turnover (%)	20.01%	13.61%	-

31 Refer to our [Human Rights Policy](#) for more information.

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

AUSTRALIA	2021	2022	% CHANGE
Total number of employees	3,939	4,000	1.55%
Total New Hires	580	1,398	141.03%
New Hires (%)	14.72%	34.95%	–
Total Turnover	964	1,337	38.69%
Total turnover (%)	24.47%	33.43%	–

CHINA	2021	2022	% CHANGE
Total number of employees	677	580	-14.33%
Total New Hires	13	13	0.00%
New Hires (%)	1.92%	2.24%	–
Total Turnover	95	113	18.95%
Total turnover (%)	14.03%	19.48%	–

MALAYSIA	2021	2022	% CHANGE
Total number of employees	41	41	0.00%
Total New Hires	5	3	-40.00%
New Hires (%)	12.20%	7.32%	–
Total Turnover	4	4	0.00%
Total turnover (%)	9.76%	9.76%	–

NEW ZEALAND	2021	2022	% CHANGE
Total number of employees	–	596	–
Total New Hires	–	84	–
New Hires (%)	–	14.09%	–
Total Turnover	–	74	–
Total turnover (%)	–	12.42%	–





## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

2022	CURRENT EMPLOYEES	NUMBER OF NEW HIRES	RATE OF NEW HIRES	NUMBER OF TURNOVERS	RATE OF TURNOVER
<b>Gender</b>					
Male	19,632	3,221	16.41%	1,316	6.70%
Female	3,340	697	20.87%	353	10.57%
<b>Age Group</b>					
<30 years	1,850	1,000	54.05%	276	14.92%
30-50 years	11,147	2,194	19.68%	960	8.61%
>50 years	9,975	724	7.26%	433	4.34%
<b>Total</b>	<b>22,972</b>	<b>3,918</b>	<b>17.06%</b>	<b>1,669</b>	<b>7.27%</b>

ComfortDelGro upholds our commitment to fair labour practices and human rights. We have a set of fair and progressive employment terms that reflect the values and competitiveness of our company. Our employment terms and conditions are in accordance with employment legislation as well as various Tripartite standards, guidelines, and advisories that serve as guiding principles for our policies. We also benchmark our employment terms and conditions against market norms and industry practices. Our employment contracts are clearly written and include all key employment terms, which are our commitments to our employees. We obtain our employees' written acknowledgement of these key employment terms.



## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### DIVERSITY AND EQUAL OPPORTUNITY

Diversity and equality remain a core value at ComfortDelGro, as 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 take pride in fostering a culture of inclusion, promoting diversity and equal opportunity.

With operations spanning across the globe, we take a zero-tolerance approach to discrimination and strive to cultivate a diverse and collaborative workforce through talent attraction and retention. In 2022, we have revised our Groupwide Diversity, Equity and Inclusion ("DEI") policy<sup>32</sup>, enhancing our commitment in creating a workplace of equal opportunities.

We strive to provide a fair and supportive working environment for all our employees, regardless of their sex, age, marital status, sexual orientation, disability, race, colour, nationality, ethnic or national origin, religion, or affiliation to any political party or trade union. We do so by enforcing our Human Rights Policy<sup>33</sup> that outlines our diversity and equal opportunity principles. We value diversity and work hard to create an inclusive culture where our employees treat one another fairly and respectfully. We did not receive any formal complaints of discrimination cases in 2022.

Our DEI initiatives include, but are not limited to, our recruitment and selection practices and policies, compensation and benefits, professional development and training, promotions, transfers, social and recreational programmes, layoffs, and terminations, and the ongoing development of a work environment based on diversity, equity, and inclusion. All employees are also required to attend the DEI Policy awareness training to enhance their knowledge and deepen their understanding of their responsibilities. Our existing employees are required to acknowledge and declare our DEI policy annually.

As a corporate signatory of the TAFEP, we adhere and comply with all relevant regulations as well as TAFEP's give key principles of employment practices. We acknowledge and respect our employees' right to join and be represented by the labour movement. We believe in Tripartism and work hard to establish and maintain positive relationships with trade unions and their representatives. All employees are provided equal access to training and development based on their strengths and capabilities to help them achieve full potential.



We adopt the Tripartite Guidelines on Fair Employment Practices issued by the Tripartite Alliance for TAFEP, where we:

1. Recruit and select employees based on merit such as skills, experience or ability to perform the job, regardless of age, race, gender, religion, marital status and family responsibilities, or disability.
2. Treat employees fairly with respect, and implement progressive human resource management systems.
3. Provide employees with equal opportunity to be considered for training and development based on their strengths and needs to help them achieve their full potential.
4. Reward employees fairly based on their abilities, performances, contributions and experiences.
5. Abide by labour laws and adopt the Tripartite Guidelines on Fair Employment Practices.

We strive to hire people who reflect society's diversity, and we value each of our employees' individual and collective contributions. By providing a safe and conducive work environment, we ensure our employees are able to express their diverse viewpoints without fear of repercussions or discrimination.

We remunerate our employees fairly, taking into consideration factors such as their ability, performance, contribution, skills, knowledge and experience. We also benchmark our remuneration package periodically against established market indicators, to ensure that we compensate our employees fairly, and to maintain our market competitiveness for talent.

<sup>32</sup> Refer to our [Diversity, Equity, and Inclusion \(DEI\) Policy](#) for more information.

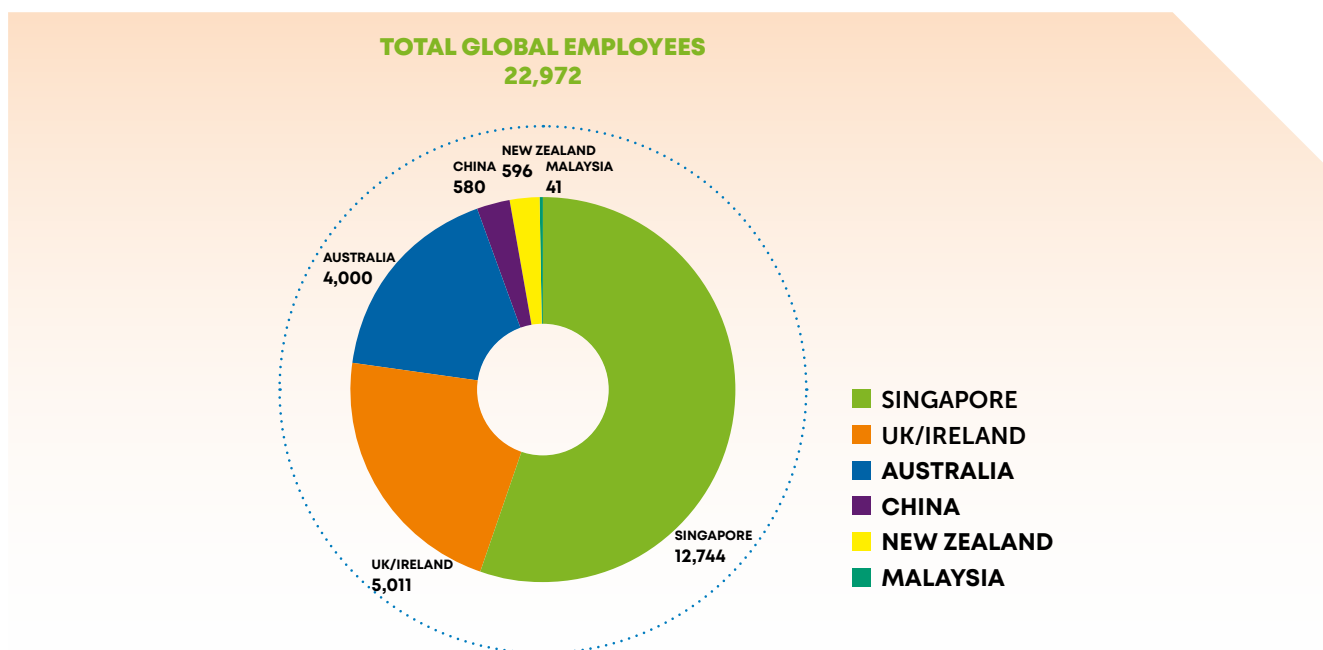
<sup>33</sup> Refer to our [Human Rights Policy](#) for more information.

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### OUR PERFORMANCE AND LOOKING FORWARD

Our entities across our regional operations have taken steps to create an inclusive workforce. For example, SBS Transit in Singapore has recruited and deployed four persons with disabilities as station guides as a commitment to the Sustainable Employment by Singapore Business Federation.

In 2019, we issued a statement in support of the United Nations (“UN”) Women’s Empowerment Principles alongside 65 of our investors. We continue to support our commitment to these principles through gender equality initiatives to the communities. We strongly advocate for gender diversity at Board levels. The diverse range of talent on our Board enables us to garner a wide range of perspectives for our organisational strategies, discussions, and solutions. Across the Board, we have achieved a 36% female representation.



TOTAL NUMBER OF EMPLOYEES (BY AGE)	MALE	FEMALE	TOTAL
<b>Permanent / Full-Time Employees</b>			
Total	16,519	2,922	19,441
<30 years	964	302	1,266
30-50 years	7,971	1,547	9,518
>50 years	7,584	1,073	8,657
<b>Temporary Employees (Temporary)</b>			
Total	437	254	691
<30 years	62	39	101
30-50 years	218	168	386
>50 years	157	47	204
<b>Contract employees (Contract)</b>			
Total	3,113	418	3,531
<30 years	459	125	584
30-50 years	1,457	172	1,629
>50 years	1,197	121	1,318



## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES



TOTAL NUMBER OF EMPLOYEES (BY EMPLOYEE CATEGORY)	MALE	FEMALE	TOTAL
Senior Management Individuals	17	4	21
In percentage (%)	81%	19%	100%
Executives	1,439	613	2,052
In percentage (%)	70%	30%	100%
Non-Executives	18,176	2,723	20,899
In percentage (%)	87%	13%	100%
Total	19,632	3,340	22,972
Total in percentage (%)	85%	15%	100%

TOTAL NUMBER OF EMPLOYEES (BY EMPLOYEE CATEGORY)	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	TOTAL
Senior Management Individuals	0	5	16	21
In percentage (%)	0%	24%	76%	100%
Executives	130	1,177	745	2,052
In percentage (%)	6%	57%	37%	100%
Non-Executives	1,720	9,965	9,214	20,899
In percentage (%)	8%	48%	44%	100%
Total	1,850	11,147	9,975	22,972
Total in percentage (%)	8%	49%	43%	100%

RATIO OF THE BASIC SALARY OF WOMEN TO MEN	WOMEN	MEN	RATIO
Senior Management	33,028	35,982	0.92
Executives	11,255	12,475	0.90
Non-Executives	5,817	4,727	1.23

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### EMPLOYEE WELL-BEING

The importance of mental and physical wellness of the workforce has become a priority for ComfortDelGro. At ComfortDelGro, we acknowledge our responsibility in ensuring positive contributions to the well-being of our employees. We believe that employees with a strong sense of well-being are more creative, productive, and alert, thereby aiding in the prevention of unnecessary workplace accidents and inefficiencies. Beyond this, our commitment to the well-being of our workforce also encourages a sustainable and positive organisational culture. Through a series of initiatives, training, and engagement, as well as through the provision of benefits, we aim to improve the well-being of our employees.

### OUR PERFORMANCE AND LOOKING FORWARD

During the year, Group Human Resources team curated a series of programmes to help employees improve both physical and mental well-being. This was rolled out across several webinars focusing on educating employees to manage their stress whilst encouraging them to co-monitor their peers and colleagues for early intervention if they detect a health issue. Some examples of these webinars include: "Becoming an Overcomer: Moving Beyond Setbacks in Life", "Healthy Eating While Out & About", "Psychology of Change & Ways to Embrace it Effectively". Throughout the year, the team also arranged employee engagement activities, to encourage connection and team building across the organisation.

SBS Transit worked together with the Workplace Safety and Health ("WSH") Council and their appointed vendor to survey staff and bus captains to identify key focus areas pertaining to their physical and mental health. After the surveys were conducted, physical and mental health interventions were launched, and a four-part infographic series was disseminated to all employees. Additionally, SBS Transit launched a new initiative, Intellect, that aims to provide mental well-being support including self-care programmes and counselling for employees who are facing professional or personal challenges.

ComfortDelGro will continue to place employee well-being at the forefront of its employee engagement initiatives. In the employee engagement survey conducted in 2022, which revealed our employees' confidence in the integrity of the company and concern for their safety. Employees are comfortable to report any safety concerns, no matter how trivial they might be, have clear understanding of what is expected of them and believes that their job appointment makes good use of their skills and abilities. We are continuously working on formalising programmes for our workforce in new and critical areas such as sustainability transition, non-conscious bias, and diversity training whilst continuously supporting flexible work arrangement ("Hybrid Work Arrangement"); and providing an array of leave benefits such as annual leave, parental leave, childcare leave to support our employees who are caregivers and parents.



An Employee Engagement Survey was conducted in Q2 2022. The Survey reaffirms ComfortDelGro's top 5 Strengths:

1. The Company is committed to employee safety.
2. The Company is a safe place to work.
3. Employees are also comfortable reporting any safety concerns, no matter how trivial they might be.
4. Job appointment makes good use of the employee's skills and abilities.
5. Employees have clear understanding of what is expected of them.

In 2022, the various employee engagement events arranged include:

- Mental Wellness (webinars)
  - Becoming an Overcomer: Moving Beyond Setbacks in Life
  - Psychology of Change & Ways to Embrace it Effectively
  - Snooze Snooze Sleep Soundly
  - Mental Health Matters: Supporting Employees at Work
- Health Wellness (webinars)
  - Important Nutrients Throughout a Female's Lifespan
  - Healthy Eating While Out & About
  - An Introduction to Prostate & Urinary Issues
  - Virtual Cooking Demonstration: Thai Green Curry & Sago Gula Melaka
  - Yoga (virtual)
  - K-Pop (virtual)
  - Welcome back to Office Fruit Bags
- Staff engagement events



## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### TRAINING



Another key element of ensuring professional development and engagement for our employees, is disseminating relevant active training and upskilling opportunities. This aids our employees in attaining valuable long-term career development.

At ComfortDelGro, we continuously strive for innovative solutions and strategies to navigate our people through their development and upskilling journey. We give employees an equal chance to be considered for training and development based on their strengths and needs in order to help them reach their full potential.

As we migrated to online solutions early, we were able to easily adapt to offer virtual trainings, with various upskilling trainings and development programmes focusing on Digital Awareness (Cybersecurity Basics, Emerging Digital Technologies, Basic Data Analytics, End-User Computing), Safety and Security, Operations, Engineering (EV, hybrid vehicles, rail maintenance), and Service Excellence. The need for training extends beyond our requirement for a capable and agile workforce to also encompass our commitment to the professional development of our workforce. Additionally, our employees are able to develop their leadership, soft skills, functional, and technical competencies through a variety of channels; formal learning (face-to-face training, e-learning), learning from others (coaching by their managers, buddy systems, peer learning), and on-the-job learning (stretching targets, job rotation, cross department projects). Internally, human capital development metrics, learning hours and training types are monitored and reported to management.

As part of our succession planning, we have Individual Development Plans to identify and prepare talents for business and leadership roles.

The performance management system enables our employees to contribute more effectively to business goals by allowing them to give and receive constructive feedback and set goals collaboratively, assisting management in gathering information about underperforming employees and determining how they

can perform better, and motivating high performers to take on larger challenges.

100% of our employees receive annual performance and career development reviews, assessed on the criteria of their competency and contribution. Our executive level staff are reviewed on additional aspects such as key performance tasks and targets.

We have a systematic process to monitor and assess our employee performance, involving formal appraisals, regular feedback, and the identification of training and development needs. We:

1. Develop measurable standards for evaluating job performance.
2. Review our criteria regularly to check against discrimination.
3. Document and keep all performance reviews for at least one year.
4. Set up an internal appeal process to address employees' questions or concerns on their appraisals.
5. Communicate posting and training opportunities to all eligible employees.

### OUR PERFORMANCE AND LOOKING FORWARD

Our broad range of training offerings allow employees to tailor their development according to their specific needs. In 2022, the average training hours per employee was 22.1, 9% up from 20.2 hours in 2021. This is due to ease of governmental restrictions for COVID-19 globally, allowing for the gradual resumption of face-to-face trainings.

We continue to execute our efforts on upskilling and training our employees across all regions of operations whilst promoting digital training across all Business Units to enhance the adaptability and capabilities of our workforce.



## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

With strategic linkages to broader business goals, our Learning Needs Analysis is conducted annually with business leaders and key stakeholders, to identify learning and performance gaps. The critical competencies and skills training programmes are carefully designed and developed to address current and future learning needs. After the training is implemented, we measure the effectiveness of the training through feedback, for future improvement.

Based on our future ready competency framework, we provide a diverse range of development programmes for our employees, including Leadership & People Management, Business Excellence and Technical Skills.

In an effort to transition towards utilising hybrid and electric vehicles, ComfortDelGro is committed in developing the capabilities of automotive technicians to be future-ready. ComfortDelGro and TÜV SÜD PSB announced a partnership to jointly develop a training

programme that aims at upskilling automotive technicians on the safe handling of high voltage systems in electric and hybrid vehicles. This training programme will enforce industry standards and grow the pool of skilled technicians as Singapore works towards a more sustainable future. The programme is offered to internal employees and to members of the public.

ComfortDelGro emphasises the development of our talent for sustainable mobility therefore we have collaborated with Institute of Technical Education ("ITE"). The collaboration aims to introduce programmes, over the next five years, aimed at enhancing technical competencies and technologies pertaining to Sustainable Mobility Technology for ComfortDelGro staff and ITE students.

In addition to physical training opportunities, ComfortDelGro has developed various e-learning to equip its people with critical skills, including but not limited to, Cyber Security, Data Analytics, Digitalisation in 2022.

### TRAINING HOURS SUMMARY, BY GENDER AND LEVEL (2022)

TOTAL TRAINING HOURS	2020	2021	2022
Average training hours per employee	18.6	20.2	22.1

TOTAL TRAINING HOURS (BY GENDER)	WOMEN	MEN	TOTAL
Total number of employees	3,340	19,632	22,972
Total number of training hours	56,447	450,543	506,990
Average training hours	16.9	22.9	22.1

TOTAL TRAINING HOURS (BY EMPLOYEE CATEGORY)	SENIOR MANAGEMENT	EXECUTIVES	NON-EXECUTIVES	TOTAL
Total number of employees	21	1,668	21,283	22,972
Total number of training hours	1,765	56,575	448,650	506,990
Average training hours	84.0	33.9	21.1	22.1

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### OUR PATRONS AND COMMUNITIES

ComfortDelGro aims to continue providing services of the highest quality, enhancing transportation accessibility for all, and upholding good corporate citizenry by engaging in philanthropic activities within our communities and the wider society.

### WHY THIS MATTERS TO US

ComfortDelGro understands the necessity of our services, and are mindful of the impact we can leave on the people and communities around us. Beyond connecting people through our services, we believe that our business is also a platform to connect with people. ComfortDelGro strives to make safe transportation accessible to all whilst providing support to the communities which we operate in. In doing so, we hope to foster a more inclusive society and enhance the well-being of our stakeholders and beyond.

### HOW WE MANAGE THIS

ComfortDelGro endeavours to understand the most pressing issues within our communities and work to contribute to alleviating the issues. As active societal engagement is embedded throughout our operations, we hope to capitalise on this to uphold our longstanding commitment of good corporate citizenry. Enabling this, ComfortDelGro does its utmost best to provide top quality service and respond to the everchanging needs of its patrons and society, creating value for all. Additionally, we are proactive in our philanthropic activities and ensure regular engagement with local communities to manage our impacts and benefit those around us.

### ACCESSIBILITY

Bolstering transportation accessibility is essential for the development of an inclusive society. As a leading service provider within the land transportation industry, ComfortDelGro is resolute in our commitment to enhance societal inclusivity and accessibility through our services. Additionally, we take strides to instil an inclusive and accessible culture and environment across our operations, thereby enhancing the well-being of our staff, customers, and relevant communities.



### OUR PERFORMANCE AND LOOKING FORWARD

Wheelchair accessible lifts, ramps and restrooms have been implemented across our work premises. Likewise, all our public buses operated across Singapore, Australia, and the UK are wheelchair accessible, enabling the safe transportation of persons-in-wheelchairs ("PIWs"). ComfortDelGro's bus drivers are actively trained on how to properly assist PIWs and deploy the ramps effectively. Similarly, our bus drivers also undergo rigorous trainings in accordance with ComfortDelGro's eight service standards, thus addressing the needs of different customers including those with disabilities – both physical and invisible in nature.

In the UK and Ireland, our employees are mindful of disabilities and equipped to respond to the needs of disabled patrons. For example, staff are taught how to load wheelchairs onto vehicles in an appropriate manner. In support of this, Metroline has several internal maintenance policies and protocols in place to safeguard the effectiveness and safety of accessibility features installed across our operations. Exemplifying this, wheelchair ramps are always tested at the garage prior to any vehicle journeys to ensure that they are functioning properly. Additionally, Metroline regularly hosts and engages in activities, trainings, and campaigns with various partners to enhance disability awareness and sensitivity amongst employees, relevant stakeholders and the wider public. Moreover, all Hackney Carriages of Computer Cab across London and Hackney are wheelchair accessible as well.

Likewise, in Australia, all drivers from Forest Coach Lines and Blue Mountains Transit are well-trained to assist the elderly and patrons with disabilities. All of Swan Taxis'





## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES



cabbies are also equipped to aid disabled and elderly customers. In the same vein, a Customer Connect Care training was also conducted by CDC Victoria to new bus drivers in 2022, bringing the total to 470. In China, disabled patrons are also given free rides on China's National Disability Day, which falls on the third Sunday of May 2022.

In Singapore, to foster an inclusive environment, the S\$1,000 annual membership fee for private driving instructors is waived for students with disabilities. All taxis under ComfortDelGro Taxi are also well-placed to serve disabled patrons as all taxi drivers are trained to appropriately assist disabled customers. At the same time, our cabs are also designed with sufficient boot space to transport foldable wheelchairs and other disability-related equipment. Our unwavering dedication to enhancing transport accessibility is further highlighted through our provision of fee waivers to the visually impaired. Visually impaired customers with guide dogs requiring private transport in their daily routine receive up to three fee waivers a day to go about their daily routines. In so doing, ComfortDelGro is able to augment societal inclusivity whilst demonstrating how much we value customers of all backgrounds.

Additionally, senior citizens and people with mobility issues can also engage ComfortDelGro MedCare services to ferry them to medical appointments or social appointments. This involves the use of minibuses which are specially designed and equipped to accommodate a variety of wheelchairs, such as motorised or bulkier wheelchairs. For example, PIWs are able to board the vehicles without dismounting their wheelchairs through the usage of the automatic hydraulic lifts feature. This

facilitates the ease of travel for those in need whilst enhancing transport inclusivity within Singapore. The Travel Buddy programme launched by SBS Transit last year will also enable persons with disabilities to travel independently and confidently.

As we integrate and install the abovementioned initiatives, policies, and features across our operations, ComfortDelGro hopes to foster a diverse, accessible, and inclusive transportation environment in all the countries that we function in.

Going forward in 2023 and beyond, we remain steadfast in our commitment to continuously advance accessibility across all of our operations and thus seek to persist in innovating, integrating, and investing in opportunities and technologies which will aid us in this aspect. We also aim to maintain 100% wheelchair accessibility for all our public buses.

WHEELCHAIR ACCESSIBILITY ON PUBLIC BUSES		
	2021	2022
Singapore	100%	100%
UK & Ireland	100%	100%
Australia	100%	100%

WHEELCHAIR ACCESSIBILITY ACROSS ALL BUSES (PUBLIC BUSES, COACHES AND PRIVATE HIRE BUSES)		
	2021	2022
Singapore	98.2%	99.8%
UK & Ireland	82.2%	97.7%
Australia	64.0%	64.0%

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### SERVICE QUALITY

As a leader in the transport service industry, ComfortDelGro prides itself in providing top quality transportation services which are both safe and inclusive. We have put in place processes and customer engagement platforms to receive and review customer feedback and subsequently, identify gaps for improvement. This builds trust with our customers and demonstrates how much we value their input. In doing so, we hope to develop long-term relationships with our customers whilst ensuring the quality of services deployed.

### OUR PERFORMANCE AND LOOKING FORWARD

Across all our operations, information counters are readily available at bus interchanges and MRT stations for customers to seek help in person. Our websites, hotlines, mobile applications and social media channels provide online alternatives for customers to engage with us. Upon receipt of any enquiries, ComfortDelGro strives to respond to customers within reasonable timeframes.

In 2022, ComfortDelGro Taxi responded to 92% of urgent cases within two working days, above a target of 82%, and 87% of normal cases within five working days, above a target of 80%. We also held regular feedback and engagement sessions with our corporate business clients. SBS Transit achieved 42.4 compliments and commendations and 4.5 valid complaints per million passenger trips. For Greater Sydney Region 4, our largest contract in Australia, 99.3% of complaints and enquiries were resolved within 2 working days. Of which, 98.7% of complaints were resolved within 2 working days, above a target of 70%.

For our public transport operations, we strive to provide a punctual and reliable service and minimise any deviations from planned schedules, whilst enforcing strict abidance to all relevant safety standards and checks. Since 2021, SBS Transit has partnered Stratio to routinely monitor our bus conditions in a bid to bolster cost-effectiveness and augment customer satisfaction. Consequently, it was able to optimise maintenance processes and improve the reliability of bus services, thereby upgrading commuters' travelling experiences. In the same vein, SBS Transit facilitates the ease of public transport through its mobile app which provides users with real time updates of train and bus schedules. As a result, commuters are able to better plan their time based on the information provided. To find out more about other accessibility and inclusive initiatives which SBS Transit has to offer, refer to the [SBS Transit Sustainability Report 2022](#).

ComfortDelGro also strongly prioritises road and public safety when considering service quality. As such, we work closely with the traffic police to ensure road safety by having regular quarterly traffic police personnel giving road safety talks and seminar with our bus captains as well as the taxi drivers. All bus drivers and customer service officers regularly undergo trainings and refresher

courses to maintain a high standard of road safety and security. In managing COVID-19 on public transport, ComfortDelGro stringently abides by all government protocols and enforces the implementation of necessary safe management measures such as the wearing of masks.

In Singapore, the Public Transport Council conducts surveys to ascertain service quality and customer satisfaction. In 2022, commuters were determined to be satisfied with our country's public transport services. We attained a mean satisfaction score of 8.2 out of 10 for our MRT services, 7.7 out of 10 for our public bus services, and 8.0 out of 10 for the Point-to-Point ("P2P") services covering taxis and private hire vehicles. In the UK, Transport for London runs regular customer and mystery traveller surveys relating to various aspects of the customer experience which rank transport operators in various metrics out of 100, relating to drivers and vehicle performance. In 2022, Metroline achieved a weighted average score of 84.1 for drivers and 72.3 for vehicle performance. In Australia, surveys are also conducted by the State governments who publish The Customer Satisfaction Index to demonstrate satisfaction levels across all public transport. The 2022 results for Greater Sydney Region 4 showed 94% of customers rating overall very satisfied with bus services. We continue to work hard and strive to maintain our delivery of excellent commuter satisfaction and execution of top transportation services.

Going forward, ComfortDelGro remains unwaveringly dedicated to upholding top service quality and ensuring frequent customer engagement. We continuously review and update our processes whilst improving on the feedback received from customers. As a result, we hope to foster longstanding relationships with the community whilst growing and developing our capabilities.





## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

### LOCAL IMPACT AND CSR

ComfortDelGro believes in creating positive social impacts beyond our direct operations through our philanthropic contributions to the local communities around us. We also endeavour to extend care and aid to those in need. Each of our countries of operation is responsible for their respective social responsibility outreach, ensuring that programmes are tailored specifically to the needs of their local communities. In 2022, ComfortDelGro collectively funded S\$1.28 million in donations.

### OUR PERFORMANCE AND LOOKING FORWARD

#### SINGAPORE

With the aim of supporting and creating positive impact within the community, under our CabbyCare Charity Group comprising solely our taxi drivers, we continued our practice of delivering meals and bread to the needy for free, having made over 2,230 trips in 2022. Recognising the significance of engaging with the younger generation, our ComfortDelGro Driving Centre conducted road safety talks to over 560 secondary school students via visual platforms and physical workshops. Our participation underlines our commitment towards contributing to the communities in which we operate, highlighting our efforts in providing safe, efficient, and accessible mobility to all.

In support of Caring Commuter Week, SBS Transit held an interactive exhibition, "Walk in My Shoes" to raise awareness on dementia in November 2022 and organised an informative tour of the Downtown Line Depot as part of a collaboration with the LTA. Since its inception, SBS Transit has continued its school engagement programme to assert the importance of safety on public transportation. This year, SBS Transit continued conducting virtual school talks and with the easing of the pandemic's restrictions, they have also reverted to conducting physical learning



programmes at SBS Transit depots, MRT stations and bus interchanges.

ComfortDelGro Bus provided two-way shuttle services for VIVA Foundation in 2022, for Children with Cancer's "An Evening of Pop Opera with FIVERA8" at the Singapore Botanic Gardens. VIVA's inaugural Concert in the Park, which featured performances by pop opera group FIVERA and the Singapore Ballet, was graced by Minister of Health, Mr Ong Ye Kung.

ComfortDelGro also contributes to NTUC U Care Fund (previously as "NTUC Eldercare") since 2005. This programme provides social day care services to underprivileged elderly groups. We are pleased to have contributed a total of S\$2.09 million to this cause to-date. ComfortDelGro Taxi's Decommissioned Taxi Gifting Programme donates used taxis to hospitals and elderly homes for rehabilitative and training purposes.

#### AUSTRALIA

Supporting and uplifting indigenous people in Australia is a consistent and long-term key focus area for our community outreach activities. In July 2022, National Aborigines and Islanders Day Observance Committee Week was held together with CDC to commemorate and honour indigenous Australians across depots and Business Units across Australia.

In an effort to promote the stories and history of indigenous peoples, CDC NSW has continued the collaboration with Kinchela Boys Home Aboriginal Corporation to facilitate healing through partnership. CDC Victoria also hosted seven young indigenous people at the Wyndham Depot and head office, with the aim of sharing potential career opportunities that are available to them.

In our Australia operations, the value of sport in uniting people and creating common ground, is well respected. CDC Northern Territory used this principle to support the Deadly Cup indigenous rugby league event in July 2022. CDC Northern Territory also provided sponsorship for the Jabiru Bombers, an Australian rules football code unique to Australia. Likewise, CDC NSW provided support in Sydney for various sporting events, including the provision of safe and accessible transport for fans to get to the games.



Our Australian operations has also consistently supported the National Aborigines and Islanders Day Observance Committee ("NAIDOC") Golf Day during NAIDOC week for the past three years, where we donated money and prizes for the day to facilitate fundraising and its occurrence. In August 2022, CDC Northern Territory also supported YMCA Palmerston with transport from Palmerston to Marrara tennis centre for an Indigenous tennis carnival.

Moove Media Australia has supported social organisations such as the Sydney Children's Hospitals Foundation, Breast Cancer Trial, and Dolly's Dream through 2022, providing free-of-charge advertising on buses for their various messages.

As a response to the bushfires in Australia, CDC established the CDC We Care Fund totalling AUD \$250,000 to support fire-fighting efforts in 2020. The Fund has since been

## SOCIAL: SAFEGUARDING THE WELL-BEING, HEALTH AND SAFETY OF OUR PEOPLE, PATRONS, AND COMMUNITIES

transitioned to provide assistance and recovery measures during challenging situations such as the pandemic or disasters faced by our broader communities, including employees working in the areas that we operate. In 2022, the Fund was activated again to support families affected by the heavy floods in South East Queensland and Regional New South Wales.

Similarly, CDC Victoria supported the Red Cliffs Community Resource Centre by sponsoring a vehicle to make food deliveries to the disadvantaged in Mildura; in aiding the multicultural community organisation in Melbourne's western suburb of Werribee with the securement of water for their community garden. Contributions included the funding of AUD \$15,000 to support the underprivileged but

### UNITED KINGDOM

In our UK operations, ComfortDelGro has been actively contributing to the local communities and the national economy through our subsidiaries by providing employment opportunities. We contribute to the UK government led apprenticeship scheme, which allows employers to gift up to 25% of the apprenticeship levy to selected enterprises. Supporting social initiatives where we operate, Metroline renovated and donated a bus to a London charity, Advice for Renters, for use as their community outreach base. A total of £975 was also raised and donated to the Royal British Legion in support of military veteran personnel through the annual Poppy Appeal, and £2,177 was raised for Breast Cancer Now through their "Wear it Pink" campaign in October.

Another of our UK operations, Adventure Travel was part of the Welsh national concessionary fare scheme, providing free travel to those older than 65 and those with serious disabilities. The concessionary passenger account for around 40% of our fare-paying customers.

talented and motivated young people in Melbourne's West in realising their potential through merit-based, tailor-made scholarships and opportunity programmes.

CDC Victoria also sponsored AUD \$10,000 towards a three-year environmental project with the Victorian State Government and major bus industry suppliers. In the same vein, Volvo Bus Australia, and CMV Truck & Bus are involved for the development of Australia's first dementia friendly forest and sensory trail in Victoria's Woookarung regional park in Ballarat. This award-winning initiative makes the park accessible for wheelchair users, their caretakers, people with assistance dogs, and groups from residential aged care facilities, bolstering inclusivity and aligning with our philanthropic values.



Our business, Citylink, has also been actively working with social organisations, contributing to the various causes around Ireland. Citylink continued its long running engagements with different organisations including the Irish Cancer Society, Inis Aoi bhinn House and The Galway Hospice, raising awareness for breast cancer, providing transport for chemotherapy and dialysis patients, as well as for the organisation's activities respectively. Citylink has also been a valued member of the sporting community, supporting Galway sport events such as the Galway Senior Hurling, and have become the transport provider of the Galway Ladies Camogie team. For more than five years running, Citylink has also been involved in the Galway International Arts Festival and Baboro Children's Art Festival and will continue to be part of the tradition in their local community.



### CHINA

In our China operations, we focussed on social responsibility efforts and providing financial aid to those in need. Since 2013, Beijing Jin Jian Taxi Services has been contributing to the Beijing Warmth Foundation, whose role was to actively encourage workers to participate in fund raising activities to aid those facing financial difficulties. As of today, Beijing Jin Jian Taxi Services has contributed RMB 50,000 to this Foundation.

We also encouraged our employees to actively participate in volunteering. From March through October 2022, our

drivers partook in efforts against the pandemic across cities in China, volunteering to provide transport services or volunteering in COVID-19 prevention efforts across their communities. Within Jilin City, 15 of our drivers joined the Emergency Supply Fleet organised by the Jilin Municipal Commerce Bureau, to provide free delivery services for daily necessities for residents, when a severe COVID-19 outbreak occurred in March 2022.

In line with our commitments and ambitions, our taxi drivers from Shenyang ComfortDelGro Taxi also visited nursing home in Da Dong District. Similarly, our taxi drivers from Chengdu ComfortDelGro Taxi volunteered to deliver rice and provide free trips to the elderly and the disabled. Our taxi companies in China have also been providing free taxi trips to all examinee during the country's National Education Entrance Examination in June 2022.

### LOOKING FORWARD

ComfortDelGro will remain committed to enhancing its social licence to operate through various meaningful engagements with our local communities. Moving forward, we aim to continuously expand our engagement and participation in local social causes, creating greater value within communities we operate in. In doing so, we hope to advance the practice of good corporate citizenry and create long lasting positive impacts as best we can.

# GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS

**WITH STRONG  
GOVERNANCE,  
ETHICAL  
INTEGRITY,  
AND INNOVATION**

MAINTAINING ETHICAL,  
TRANSPARENT, AND COMPLIANT  
OPERATIONS WITH ZERO  
TOLERANCE FOR BRIBERY,  
CORRUPTION, AND ANTI-  
COMPETITIVE BEHAVIOUR



## GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY, AND INNOVATION

### ETHICAL BUSINESS AND OPERATIONAL INTEGRITY

#### WHY THIS MATTERS TO US

ComfortDelGro honours the trust we receive from our patrons and stakeholders. We take the enforcement of ethical business practices and operational integrity seriously as this constitutes an essential pillar of our corporate identity.

With our extended operations across Singapore, the UK, Ireland, Australia, China, Malaysia, and New Zealand, we take full responsibility in ensuring strict compliance with all relevant legislation, policies, and codes. At the same time, we strive to delineate maximum transparency for all. We are vigilant with high business and ethical risks including legal and reputational risks, potential financial costs, and erosion of internal trust, which may potentially create adverse impacts to our business and clientele. As such, we work proactively to combat any forms of bribery, corruption, non-compliance, and the related risks in our business operations.

#### HOW WE MANAGE THIS

Transparency plays a significant part in our business conduct. Therefore, we are obliged to fully comply to the following policies:

- Anti-corruption
- Anti-bribery
- Competition law
- Supplier Code of Conduct<sup>34</sup>
- Whistleblowing policy<sup>35</sup>

It is also our commitment to:

- Conduct our affairs in a manner consistent with the highest ethical and professional standards
- Engage in fair and honest business practices
- Show respect for each other, our customers, business partners, suppliers, shareholders, the authorities, and the communities we operate in
- Communicate in a factual, honest, and prompt manner
- Be open and transparent in our dealings

100% of our employees in Singapore are required to declare any conflicts of interest via our Employee Self-Service portal annually. They also undergo mandatory training courses on the Group's Code of Business Conduct<sup>36</sup> which comprises policies pertaining to Anti-corruption, Anti-bribery, Ethics and Competition Law amongst other matters. These courses are reviewed periodically to ensure content relevance and to reflect market updates. Regular communications and case studies are also delivered to ensure staff awareness and compliance.



<sup>34</sup> Refer to our [Supplier Code of Conduct](#) for more information.

<sup>35</sup> Refer to our [Whistleblowing Policy](#) for more information.

<sup>36</sup> Refer to our [Code of Business Conduct](#) for more information.



## GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY, AND INNOVATION

### OUR CURRENT PROCESSES TO PREVENT CORRUPTION

Our Group Internal Audit team conducts an independent investigation if an allegation of corrupt conduct is received. In the event of an incident involving misconduct by an employee, we execute disciplinary action as deemed necessary. Consequences of misconduct include, but are not limited to, termination of employment, and notifying relevant law enforcement authorities of any alleged breaches of the law.

To ensure our supply chain partners maintain the same level of rigour we set internally, our suppliers are required to comply with our Supplier Code of Conduct.<sup>37</sup> If our suppliers are found to have participated in any fraudulent activity, corrupt conduct or demonstrate non-compliance to our Code of Conduct, ComfortDelGro will cease future engagements with them. Our Group Internal Audit team takes charge of enforcing all ethical business and operational integrity related internal policies and standards at ComfortDelGro.

We provide a safe environment for our employees to raise their concerns, and have a formal grievance handling procedure to manage employee dissatisfaction or complaints (e.g. favouritism, workplace harassment etc). As a fair employer, we:

1. Handle all complaints of discrimination seriously.
2. Conduct proper investigations into complaints.
3. Respond to the affected person promptly and proactively.
4. Record and file grievances confidentially.
5. Treat both complainant and respondent fairly.
6. Involve unions in the process when appropriate.
7. Conduct training for all managers involved in handling grievances.

### WHISTLEBLOWING POLICY

At ComfortDelGro, we have an established Whistleblowing Policy<sup>38</sup>, which empowers our employees to anonymously report any deeds of misconduct or to seek advice on implementing the organisation's policies and practices for responsible business conduct. In alignment with our Whistleblowing Policy, we set up an Alert Line in 2021 at our company website that assists in the independent reporting, investigation, swift and accurate closure of any cases. The Alert Line is directly linked to the Chairperson of ComfortDelGro Audit and Risk Committee ("ARC") and the Group Chief Internal Audit Officer. If any critical

cases are escalated, our ARC Chairman tasks the Group Chief Internal Audit Officer with the investigation of the case and subsequent reporting of the outcome to the management. The management is then responsible for the implementation of remedial or disciplinary actions where necessary.

With that, our employees can use Alert Line to report any fraudulent cases and our Whistleblowing Policy protects our employees, keeping them anonymous and protecting them from potential reprisals. In 2022, there was one critical case<sup>39</sup> reported via our whistleblowing channel to the ARC and it has been assigned to Group Internal Audit team for further investigation.

The Audit and Risk Committee oversees ComfortDelGro's Enterprise Risk Management ("ERM") framework and ensures compliance with all the regulations and listing rules at 100% of our operational regions. Our internal control processes are reviewed quarterly to maintain compliance with all emulations and listing rules. Further details on our corporate governance and ERM framework can be found in our [Annual Report 2022](#) pages 75 to 102 and 108 to 115 respectively.

Our whistleblowing policy allows employees or external parties to report such matters without fear of retaliation, discrimination, or adverse consequences. We respond to the concerns by taking appropriate action, where significant, disciplining or terminating the employment and/or services of those responsible. All reports of incidents, including information or evidence provided, on matters relating to whistleblowing will be handled discreetly, and every effort will be made to maintain the confidentiality of the information provided, within the limits of the law. The number of whistleblowing cases is updated quarterly and reported to the Audit and Risk Committee.

### CONFLICT OF INTERESTS

As means of fostering a culture of ethics and integrity, all representatives of ComfortDelGro are prohibited from extending or accepting any rewards or gifts to customers, potential customers, suppliers, consultants, governments, agencies of governments or any representative of such entities to obtain or retain business or to gain any other improper advantage. Employees must also disclose any relationships, associations, or activities that could result in an actual, potential, or perceived conflict of interest through our annual declaration exercise.

<sup>37</sup> Refer to our [Supplier Code of Conduct](#) for more information.

<sup>38</sup> Refer to our [Whistleblowing Policy](#) for more information.

<sup>39</sup> This case was raised through our whistleblowing channel and concerned a service staff who failed to declare their conflict of interest. Consequently, the staff was given a warning letter after a full investigation was carried out.

## GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY, AND INNOVATION

Every new employee hired also has to make a declaration of any conflict of interest to the Group Human Resources team upon onboarding. Declarations made are reported to respective direct superiors, the CEO of the Business Unit and Group Chief Human Resource Officer. Additionally, all staff involved in onboarding suppliers, raising purchase requisition, tender evaluation, tender award are reminded to make such declarations as well. We have an annual declaration exercise in which all employees must diligently and duly complete their annual declaration.

Furthermore, our procurement team must make an annual declaration on conflicts of interest and is required to attend a workshop on "Procurement Fraud Prevention and Detection" within their first two years of service.

### OUR PERFORMANCE AND LOOKING FORWARD

In 2022, we received whistleblowing reports of several allegations of fraud and employee misconduct. Upon investigation by the Group Internal Audit team, only two cases were substantiated for non-compliance of company policy pertaining to conflict of interest. The employment contract of one staff had been terminated, while another staff was served with a warning letter.

Additionally, 85 of our employees attended a supplementary training on Ethics, including anti-corruption and bribery modules.

INCIDENTS OF NON-COMPLIANCE	2021	2022
Incidents of fraud/corruption <sup>40</sup>	1	1
Incidents of bribery and anti-competitive behaviour	0	0
Incidents of non-compliance with voluntary codes	–	2
Total number of incidents of non-compliance with standard requirement and/or voluntary codes	1	3
Total number of incidents of non-compliance with laws and regulations	0	0
Total number and monetary value of fines for instances of non-compliance with laws and regulations that were paid during reporting period	0	0

We remain committed to upholding the highest standards of business ethics and integrity. Going forward, we aim to achieve the following targets:

- Zero cases of non-compliance on standards requirements, relevant legislation, and Code of conducts
- Zero cases of corruption, bribery, and anti-competitive behaviour

COMMUNICATION ON ANTI-CORRUPTION TO BUSINESS PARTNERS	2022 <sup>41</sup>
Total number of business partners	2,513
Total number of business partners that the organisation anti-corruption policies and procedures have been communicated to	2,513
Total percentage of business partners that the organisation anti-corruption policies and procedures have been communicated to	100%

40 In 2022, a fraud case investigated by the Corrupt Practices Investigation Bureau had consequently charged 2 service staff for taking bribes from suppliers.

41 This relates to only Singapore's business partners.

## GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY, AND INNOVATION

### CYBERSECURITY, DATA PRIVACY, AND INNOVATION

#### WHY THIS MATTERS TO US

With the growth of digital and technological advancement, businesses have accelerated in digitalisation of their processes and procedures. However, with this inclination towards digital transformation, the risks of cyber related attacks increase. These risks include the potential increase of attack surface for threat actors to perform malicious attacks such as malware, spyware and ransomware potentially leading to systems' unavailability and data breaches. It is crucial for us to fortify our defences against any cybersecurity threats and further strengthen governance in data protection processes and policies. This is important as we collect personal data of customers, partners and employees in the provision additional digital and IT services. We are committed to continuously maintaining the utmost care in storing and handling the information through consistent enhancements to our digital and IT solutions. In doing so, we strive to create a more robust data privacy and protection framework.

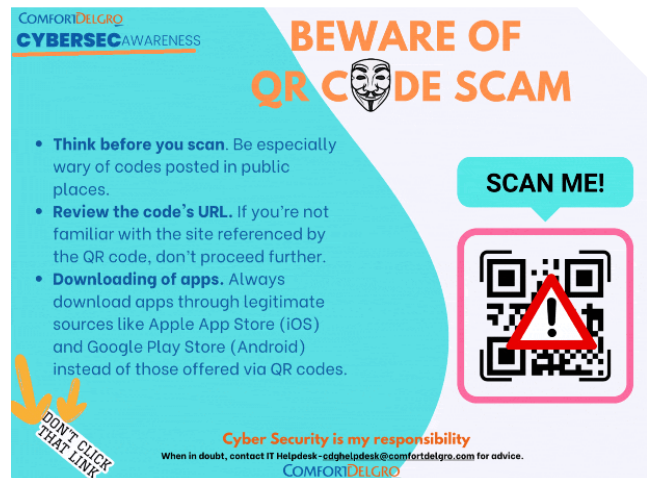
#### HOW WE MANAGE THIS

We strictly comply with all data protection and cybersecurity regulations in our respective jurisdictions of operation. Our management remains aware of the cybersecurity risks and is strives to strengthen the company's cyber security capabilities and employees' awareness.

Cyber Security Awareness Training is conducted regularly via physical and e-learning platforms, to disseminate to employees the latest information on security threats and trends, updated policies, new prevention, mitigation and response measures. This training programme is mandatory for all employees in the efforts to raise the alertness and accustom them with essential capabilities and skillset to curb cybersecurity risks.

Our management is well trained through Table Top Exercises regularly in the Cyber Security Response processes and procedures to enforce response and mitigation mechanisms in the event of a cybersecurity incident or breach. These exercises help equip our management team with effective responses to potential cybersecurity incidents, thereby minimising the impact of potential threats.

Given the growth in dependency on digital tools, technology, and IT in our operations, we also align our IT security management framework with industry standards. This enables us to mitigate and quickly respond to any potential security breaches that leads to disruption to our businesses loss of data or security breaches. We adopt



several measures such as the application of intrusion prevention systems ("IPS"), multi-level firewalls, server protection, software code hardening and data loss prevention controls ("DLP") to manage internet and cyber security threats.

When it comes to detection of potential vulnerabilities in digital and IT systems, we perform vulnerability assessments and penetration tests ("VAPT") and audits on planned intervals. Automated security updates and patches are applied to all servers and endpoints to ensure our systems uphold the highest standards of protection.

As we frequently handle personal data of our public patrons, ComfortDelGro developed our Personal Data Protection Policy<sup>42</sup> in line with Singapore's PDPA. Our Personal Data Protection Policy is reviewed every two years or whenever there are amendments to Singapore's PDPA. In order to ensure compliance to our Group's Personal Data Protection Policies, compliance audits are conducted on a regular basis during the year. In addition, a Data Protection Work Group was established to ensure compliance with the Group's PDPA Policies which consists of Data Protection Officers across our Business Units. Business Units are also encouraged to attain the DPTM certification to establish conformance to PDPA best practices. To date, ComfortDelGro Engineering and VICOM Group have all obtained the DPTM certifications.

Last year, we also enacted a Data Breach Management Plan that provides a swift and thorough response in the event of data and security breaches. This plan entails the encryption of sensitive personal data, and a series of Cyber Security Incident Response procedures to be leveraged on in the case of data breach.

42 Refer to our [Personal Data Protection and Privacy Policy](#) for more information.

## GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY, AND INNOVATION

Every month, a Cyber Security Key Risk Indicators (“KRI”) report will be submitted to the management, whereby security related events and cases are evaluated and thus investigated according to its level of severity. With our incident response preparation and monthly KRI report, we were able to reduce any potential cybersecurity risks and respond quickly when necessary.

Recognising the importance of innovation on the future of mobility, ComfortDelGro is also continuously driving investments in innovation of various mobility solutions. In 2018, a US\$100 million corporate venture capital fund was set up with a focus on incubation and investments in mobility technologies and solutions that complement the Group’s land transport business whilst providing it with new strategic capabilities.

### OUR PERFORMANCE AND LOOKING FORWARD

Moving forward, we aim to maintain a zero-breach status through continued investment in our IT platforms and systems, data protection measures and cyber security solutions.

SUBSTANTIATED COMPLAINTS REGARDING DATA PRIVACY	2022
Total number of substantiated complaints received concerning breaches of customer privacy	0
Complaints received from outside parties and substantiated by the organisation	0
Complaints from regulatory bodies	0
Total number of identified leaks, thefts or losses of customer data	0

In 2022, ComfortDelGro established a S\$30 million Autonomous Vehicle Centre of Excellence (“AV CoE”) aimed at building up its capabilities in the operation and maintenance of autonomous vehicles. ComfortDelGro also invested in Mobilion Ventures in 2022, an Israeli early-stage mobility venture fund that focuses on smart mobility and automotive after-market innovations. ComfortDelGro is a limited partner (“LP”) alongside other prominent LPs such as Mitsubishi Corporation and BorgWarner (formerly Delphi Technologies).

To facilitate internal knowledge sharing, we have also developed a Knowledge Bank in 2022, an IT system that allows internal knowledge sharing about tender wins and losses, lessons learnt and best practices among various global teams. This will play a significant role in improving organisational tendering capabilities.



## GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY, AND INNOVATION

### SUPPLY CHAIN MANAGEMENT

#### WHY THIS MATTERS TO US

We are aware of the importance of maintaining a sustainable supply chain for our long-term business growth. With the increasing demand for environmental and social disclosures on supply chains, we do our best to uphold full transparency and oversight of ComfortDelGro's supply chain.

In addition, we also understand the importance of establishing resilience in our supply chain as it helps us to better manage our Scope 3 emissions and other ESG impacts. By establishing strong relationships and high expectations on ethics with our suppliers, we endeavour to enforce the highest quality and standards of our operations.

#### HOW WE MANAGE THIS

At ComfortDelGro, we have incorporated environmental and social screenings in our supply chains. To further enhance our oversight, we have included an ESG assessment into our supplier selection criteria in 2022. Our assessment evaluates suppliers based on their compliance and alignment to our Supplier Code of Conduct<sup>43</sup> using a multi-criterion weighted matrix, with each criterion assigned a weightage according to its relative importance. The criteria used include:

- The supplier's technical capabilities
- Product/Service quality
- Supply assurance
- Environmental responsibility
- Safety records
- Financial stability
- Cost competitiveness

Upon selection and post-screening, the suppliers are onboarded via a process containing several compliance and risk assessments to ensure alignment to ComfortDelGro's Supplier Code of Conduct. This aids in further mitigation of supply chain risks, particularly with regards to fraud and corruption, supply assurance, legal and pricing risks, non-compliance with environmental, health and safety or other regulations, and verification on relevant ISO certifications. If suppliers are unable to comply with the Supplier Code of Conduct, ComfortDelGro will refrain for entering into a working relationship with them.

Supplier Performance Management exercises are conducted regularly to assess the performance of our suppliers performance against market norms and our contractual expectations. Key suppliers will be appraised on their cost management, safety, and service standards. Ultimately, this assists us in our risk mitigation efforts and enables us to rectify the root causes of any issues promptly.

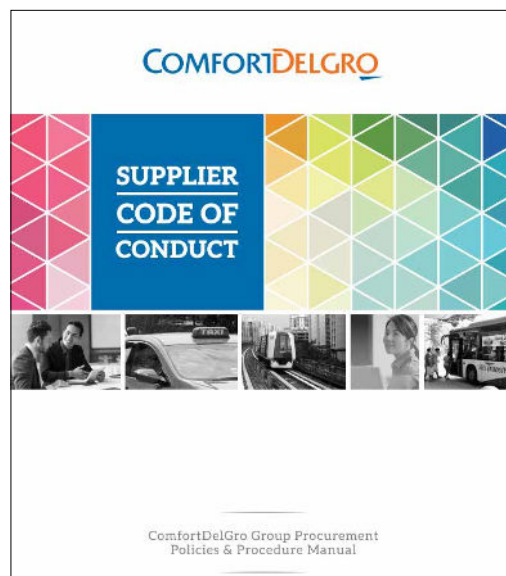
In 2020, we implemented ComfortDelGro Procurement, Analytics, Sourcing and Supplier ("ComPASS"). ComPASS is an electronic spend management system that drives end-to-end procurement processes. The system includes our supplier onboarding, sourcing, contract management, procure-to-pay and spend analysis functions for all local and overseas trade suppliers. Through its roll out, ComPASS has enabled suppliers to electronically submit bids for quotation and tendering, sign contract through integration, retrieve Purchase Order and submit e-invoices via a single platform. In 2022, more than 95% of the transaction volume in Singapore was made through ComPASS. The implementation of ComPASS has also helped to reduce paper wastage significantly and to date, 132,265 invoices have been processed electronically.

The primary users of our procurement software are our trade suppliers in three key industries, namely manufacturing, fuel and energy supplies and facility management. These suppliers are largely based in Singapore.

#### OUR PERFORMANCE AND LOOKING FORWARD

For 2023 and beyond, we aim to achieve the following targets:

- Zero supplier incident social and environmental non-compliance occurred on ComfortDelGro's premises or in ComfortDelGro's operations.
- Ensure 100% compliance on ComfortDelGro's Supplier Code of Conduct i.e. environmental responsibility; labour rights.
- Continue providing support for our supply chain in a responsible and sustainable manner to promote the growth of the ecosystem.
- Continue to build trust and strong relationships with our suppliers.



43 Refer to our [Supplier Code of Conduct](#) for more information.

## GOVERNANCE & ECONOMIC: GROWING OUR BUSINESS WITH STRONG GOVERNANCE, ETHICAL INTEGRITY, AND INNOVATION

NEW SUPPLIERS SCREENED USING ENVIRONMENTAL CRITERIA	2022
Percentage of new suppliers screened using environmental criteria	100%
Number of suppliers assessed for environmental impacts	357
Number of suppliers identified to have significant actual/potential negative environmental impact	0
Significant actual/potential negative environmental impacts identified in the supply chain	0
Percentage of suppliers with significant actual/potential negative environmental impacts, with which improvements were agreed	0%
Percentage of suppliers with significant actual/potential negative environmental impacts, with which relations were terminated	0%

NEW SUPPLIERS SCREENED USING SOCIAL CRITERIA	2022
Percentage of new suppliers screened using social criteria	100%
Number of suppliers assessed for social impacts	357
Number of suppliers identified to have significant actual/potential negative social impact	0
Significant actual/potential negative social impacts identified in the supply chain	0
Percentage of suppliers with significant actual/potential negative social impacts, with which improvements were agreed	0%
Percentage of suppliers with significant actual/potential negative social impacts, with which relations were terminated	0%

# APPENDICES



## APPENDIX 1: GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	PAGE NUMBER OR REFERENCE	
<b>GENERAL DISCLOSURES</b>			
<b>The Organization and its Reporting Practices</b>			
<b>GRI 2: General Disclosures 2021</b>	2-1	Organisational details	About this report section
	2-2	Entities included in the organization's sustainability reporting	About this report section
	2-3	Reporting period, frequency, and contact point	About this report section
	2-4	Restatements of Information	About this report section
	2-5	External Assurance	About this report section
<b>Activities and Workers</b>			
	2-6	Activities, value chain and other business relationships	About this report section
	2-7	Employees	Page 49–51, 53–54
	2-8	Workers who are not employees	Page 44
<b>Governance</b>			
	2-9	Governance structure and composition	Page 24–25
	2-10	Nomination and selection of the highest governance body	Page 25
	2-11	Chair of the highest governance body	Page 25
	2-12	Role of the highest governance body in overseeing the management of impacts	Page 24–25
	2-13	Delegation of responsibility for managing impacts	Page 25
	2-14	Role of the highest governance body in sustainability reporting	Page 13, 24
	2-15	Conflicts of interest	Page 24, 65–66
	2-16	Communication of critical concerns	Page 43–44, 65
	2-17	Collective knowledge of the highest governance body	Page 13, 26
	2-18	Evaluation of the performance of the highest governance body	Page 24
	2-19	Remuneration policies	Page 25–26
	2-20	Process to determine remuneration	Page 25–26, 52
	2-21	Annual total compensation ratio	Page 26



## APPENDIX 1: GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	PAGE NUMBER OR REFERENCE	
<b>GENERAL DISCLOSURES</b>			
<b>Strategy, Policy and Practices</b>			
<b>GRI 2: General Disclosures 2021</b>	2-22	Statement on sustainable development strategy	Page 3-5, 13, 24
	2-23	Policy commitments	Page 19, 26, 28, 49, 52, 64-65, 67, 69
	2-24	Embedding policy commitment	Page 49, 52, 64-65, 67, 69
	2-25	Processes to remediate negative impacts	Page 43-44, 65
	2-26	Mechanisms for seeking advice and raising concerns	Page 43-44, 65
	2-27	Compliance with laws and regulations	Page 66, 68-69
	2-28	Membership associations	Page 26
	<b>Stakeholder engagement</b>		
	2-29	Approach to stakeholder engagement	Page 21-23
	2-30	Collective bargaining agreements	Page 49
<b>GRI 3: Material Topics 2021</b>	3-1	Process to determine material topics	Page 14
	3-2	List of material topics	Page 14
<b>MATERIAL TOPICS</b>			
<b>Enabling a climate-friendly and sustainable transport system</b>			
<b>Energy and Fuels</b>			
<b>GRI 3: Material topics 2021</b>	3-3	Management of material topics	Page 37
	<b>GRI 302: Energy 2016</b>	302-1	Energy consumption within the organisation
302-3		Energy intensity	Page 38
<b>Emissions</b>			
<b>GRI 3: Material topics 2021</b>	3-3	Management of material topics	Page 35
	<b>GRI 305: Emissions 2016</b>	305-1	Direct GHG emissions (Scope 1)
305-2		Energy indirect GHG emissions (Scope 2)	Page 36
305-3		Other indirect GHG emissions (Scope 3)	Page 35-36
305-4		GHG emissions intensity	Page 36
<b>Resource Stewardship</b>			
<b>GRI 3: Material topics 2021</b>	3-3	Management of material topics	Page 39, 41
	<b>GRI 306: Waste 2020</b>	306-1	Waste generation and significant waste-related impacts
306-2		Management of significant waste related impacts	Page 39
306-3		Waste generated	Page 40
306-4		Waste diverted from disposal	Page 40
306-5		Waste directed to disposal	Page 40
<b>GRI 303: Water and Effluents 2018</b>	303-3	Water Withdrawal	Page 41
	303-5	Water Consumption	Page 41

## APPENDIX 1: GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	PAGE NUMBER OR REFERENCE
<b>MATERIAL TOPICS</b>		
<b>Safeguarding the Well-being, Health and Safety</b>		
<b>Health and Safety</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 43–44, 46
<b>GRI 403: Occupational Health and Safety 2018</b>	403-1 OHS Management system	Page 43–44
	403-2 Hazard identification, risk assessment & incident investigation	Page 44
	403-3 Occupational health services	Page 44
	403-5 Worker training on OHS	Page 44
	403-6 Promotion of worker health	Page 44
	403-7 Prevention & mitigation of OHS impacts directly linked by business relationships	Page 43–44
	403-8 Workers covered by an OHS management system	Page 43–44
	403-9 Work-related injuries	Page 44–45
	403-10 Work-related ill health	Page 45
	<b>GRI 416: Customer health and safety 2016</b>	416-1 Assessment of the health and safety impacts of products and service categories
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services		Page 47
<b>Our people</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 48–49, 52, 55–56
<b>GRI 401: Employment 2016</b>	401-1 New employee hires and employee turnover	Page 49–51
<b>GRI 404: Training and Education 2016</b>	404-1 Average hours of training per year per employee	Page 57
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 56
<b>GRI 405: Diversity &amp; Equal Opportunity</b>	405-1 Diversity of governance bodies and employees	Page 25
	405-2 Ratio of basic salary and remuneration of women to men	Page 54
<b>GRI 406: Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	Page 66
<b>Our Patrons and Communities</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 58, 60–61
<b>GRI 413: Local Communities 2016</b>	413-2 Operations with significant actual and potential negative impacts on local communities	Page 61–62

## APPENDIX 1: GRI CONTENT INDEX

GRI STANDARD	DISCLOSURE	PAGE NUMBER OR REFERENCE
<b>MATERIAL TOPICS</b>		
<b>Growing our business with Strong Governance, Ethical Integrity, and Innovation</b>		
<b>Ethical Business and Operational Integrity</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 64–65, 67, 69
<b>GRI 205: Anti-Corruption 2016</b>	205-1 Operations assessed for risks related to corruption	Page 65
	205-2 Communication and training about anti-corruption policies and procedures	Page 64, 66
	205-3 Confirmed incidents of corruption and actions taken	Page 66
<b>GRI 206: Anti-competitive behavior</b>	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Page 66
<b>GRI 307: Environmental compliance 2016</b>	307-1 Non-compliance with environmental laws and regulations	Page 69
<b>Cybersecurity, Data Privacy and Innovation</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 67
<b>GRI 418: Customer Privacy 2016</b>	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 68
<b>Supply Chain Management</b>		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 69
<b>GRI 308: Supplier Environmental Assessment 2016</b>	308-1 New suppliers that were screened using environmental criteria	Page 70
	308-2 Negative environmental impacts in the supply chain and actions taken	Page 70
<b>GRI 414: Supplier Social Assessment 2016</b>	414-1 New suppliers that were screened using social criteria	Page 70
	414-2 Negative social impacts in the supply chain and actions taken	Page 70

## APPENDIX 2: SASB INDEX

TOPIC	ACCOUNTING METRIC	SASB CODE	REMARKS
<b>Greenhouse Gas Emissions</b>	Gross global Scope 1 emissions	TR-RO110a.1	Page 36
	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	Page 36
	(1) Total fuel consumed, (2) percentage natural gas, (3) percentage renewable	TR-RO-110a.3	Page 38
<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	Due to a change in our measurement methodologies and revision of data capturing process in FY2022, we are unable to capture these emissions across all of our operations.
<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	Page 45
	(1) Voluntary and (2) involuntary turnover rate for all employees	TR-RO-320a.2	Due to a change in our measurement methodologies and revision of data capturing process in 2022, we are unable to capture these emissions across all of our operations.
	Description of approach to managing short term and long-term driver health risks	TR-RO-320a.3	ComfortDelGro strongly emphasises health and safety in our workplace, and consistently communicate our measures and expectations through training, education and instilling a safety culture.
<b>Accident &amp; Safety Management</b>	Number of road accidents and incidents	TR-RO-540a.1	Page 47
	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 ComfortDelGro's business units. However, ComfortDelGro 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	N/A, ComfortDelGro does not engage in hazardous waste transportation.



## APPENDIX 2: SASB INDEX

ACTIVITY METRIC	SASB CODE	REMARKS
Revenue ton miles (RTM)	TR-RO-000.A	ComfortDelGro does not transport goods and hence this metric is not relevant to our line of business.
Load factor	TR-RO-000.B	
Number of employees, number of truck drivers	TR-RO-000.C	Total number of employees: 22,972

ComfortDelGro is not reporting to SASB Car Rental & Leasing - Sustainability Accounting Standard in 2022 due to a change in our measurement methodologies and revision of data capturing process.

## 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	48–49, <a href="#">Human Rights Policy</a>
Principle 2	make sure that they are not complicit in human rights abuses.	48–49, <a href="#">Human Rights Policy</a>
<b>Labour</b>		
Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	48–49, <a href="#">Human Rights Policy</a>
Principle 4	the elimination of all forms of forced and compulsory labour;	<a href="#">Human Rights Policy</a>
Principle 5	the effective abolition of child labour; and	<a href="#">Human Rights Policy</a>
Principle 6	the elimination of discrimination in respect of employment and occupation	<a href="#">Human Rights Policy</a>
<b>Environment</b>		
Principle 7	Businesses should support a precautionary approach to environmental challenges	26
Principle 8	undertake initiatives to promote greater environmental responsibility; and	31–32
Principle 9	encourage the development and diffusion of environmentally friendly technologies.	33–34
<b>Anti-corruption</b>		
Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery	64–66, <a href="#">Human Rights Policy</a>

## **COMFORTDELGRO CORPORATION LIMITED**

205 Braddell Road  
Singapore 579701

Mainline (65) 6383 8833  
Facsimile (65) 6287 0311  
[www.comfortdelgro.com](http://www.comfortdelgro.com)

Company Registration No. 200300002K

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