

INDIGO STAR HOLDINGS LIMITED 靛藍星控股有限公司

(Incorporated in the Cayman Islands with limited liability)

Stock Code: 8373

ENVIRONMENTAL, SOCIAL AND
GOVERNANCE REPORT
2023

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ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

OVERVIEW

In accordance with the requirements of The Stock Exchange of Hong Kong Limited (“**HKEx**”), listed companies are required to provide an Environmental, Social and Governance (“**ESG**”) Report (“**ESG Report**”). This ESG Report is compiled in accordance with the standards laid down in Appendix 20 Environmental, Social and Governance Reporting Guide (the “**Reporting Guide**”) of the Rules Governing the Listing of Securities on GEM (the “**GEM Listing Rules**”) of HKEx for the period from 1 January 2023 to 31 December 2023 (the “**Reporting Period**”).

Indigo Star Holdings Limited (the “**Company**”) is an investment holding company and through two of its main wholly owned subsidiaries, Interno Engineering (1996) Pte. Ltd. and Interno Construction Pte. Ltd. (“**Internos**” and together with the Company, the “**Group**”) principally engaged in the provision of structural reinforced and concrete works in buildings and civil engineering works in the Republic of Singapore (“**Singapore**”). Internos primarily acts as subcontractors or main contractors of major renown developers mainly engaged in formwork, steel reinforcement and concreting work of various contract sums and complexities. In addition, Internos undertake various other building construction works of various contract sums within its manpower and technical permits and contractor registration level. Internos also act as main contractors and subcontract some of their contract works to various subcontractors where necessary to meet market demands and client needs.

During the Reporting Period, the Group successfully secured an adequate number of contracts and does not anticipate any significant issues that would hinder its ability to maintain business operation. The essential ESG policies have remained consistent, with adjustments being implemented as needed to address operational needs or requirements. The key policies relevant to the topics addressed in this ESG Report are summarized below:

1. The Group remains registered as a General Building (B2) and Civil Engineering (C1) Contractor with the Building and Construction Authority of Singapore. We are dedicated to achieving success in our business endeavors, providing returns to our investors and supporters, ensuring a healthy and safe working environment for our employees, and contributing to sustainable development in both the communities we serve and within our own organization.
2. The Group aims to attain a higher level of contractor registration with the Building and Construction Authority of Singapore. This higher registration level entails stricter criteria in factors such as contract value, technical expertise, engineering competency, and safety records compared to the current level held by the Group. The board of directors (the “**Board**”) and the management team (the “**Management Team**”) of the Group are fully cognizant of this objective and are dedicated to its accomplishment.
3. The Board has approved the recent strategies and policies, which encompass the relevant environmental and social issues outlined in the Reporting Guide. The Board through the Management Team has assigned various operational heads to implement these policies and strategies. Through their established and routine work channels, operational heads report directly to the Management Team which has the overall responsibility to ensure that the Board’s approved strategies and policies are carried out effectively.
4. The Management Team is responsible to examine and address all the environmental and social issues set out in the aspects and areas of the Reporting Guide. They are obliged to explore, develop and review Key Performance Indicators (“**KPIs**”) as needed for future purposes and actions that align with the Group’s operational policy and business goals.

(I) Purpose

The purpose of this ESG Report is to disclose the Group’s vision, policies and measures by establishing KPIs, and reporting on its performances with respect to environmental and social issues for internal assessment and management control, as well as for communication to the internal and external stakeholders.

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(II) Scope of Report

Our administrative office in Hong Kong (the “**Hong Kong Office**” or “**Hong Kong**”) has minimal electricity consumption, and the water supply is provided through common amenities in the leased office space for the daily hygiene needs of our employees. As a result, the usage of water and electricity is considered insignificant. The Hong Kong Office generates negligible amounts of polluted water, hazardous and non-hazardous wastes. Therefore, this ESG Report only covers the operations and activities of our offices, our project construction sites and our employee dormitory in Singapore and the number of employees recorded in the Hong Kong Office, unless otherwise stated.

(III) Basis of Preparation

This ESG Report is compiled in accordance with the Reporting Guide outlined in Appendix C2 of the GEM Listing Rules and Guidance Governing the Listing of Securities on HKEx. The content of this report includes two main subject areas as outlined and required by the Reporting Guide, being Area A – Environmental and Area B – Social and includes disclosure of climate change related issues which have or may impact the Group.

This ESG Report, which has been reviewed and approved by the Board reports the core business operations and activities of the Group and follows the principles of materiality, quantitative, balance and consistency to disclose relevant statistics and information. The ESG Report was compiled in compliance with the “comply or explain” provisions in the Reporting Guide.

(IV) Corporate Goals and Visions

The Group strives to be an environmentally friendly and socially responsible corporation. We operates in strict compliance to the principles of minimising the risks associated with the listed ESG areas and aspects stipulated in the Reporting Guide, including but not limited to the compliance with legal and regulatory requirements, adherence to high ethical standards, minimizing negative impacts on the environment, improving the well-being of the employees, enhancing the relationship with the business parties, offering highest possible level of services to our clients, creating value to the stakeholders, and supporting the disadvantaged and growth of the community. It is also our view that environmental and social issues listed in the Reporting Guide are significant considerations for our business planning and operations. As far as possible, we have integrated these environmental and social considerations into our business objectives, strategies and operational practices with the purpose of maximizing the interests of all stakeholders, economy, environment, society and corporate governance on a fine and fair balance.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

STAKEHOLDERS COMMUNICATION AND MATERIALITY

Stakeholders' Communication

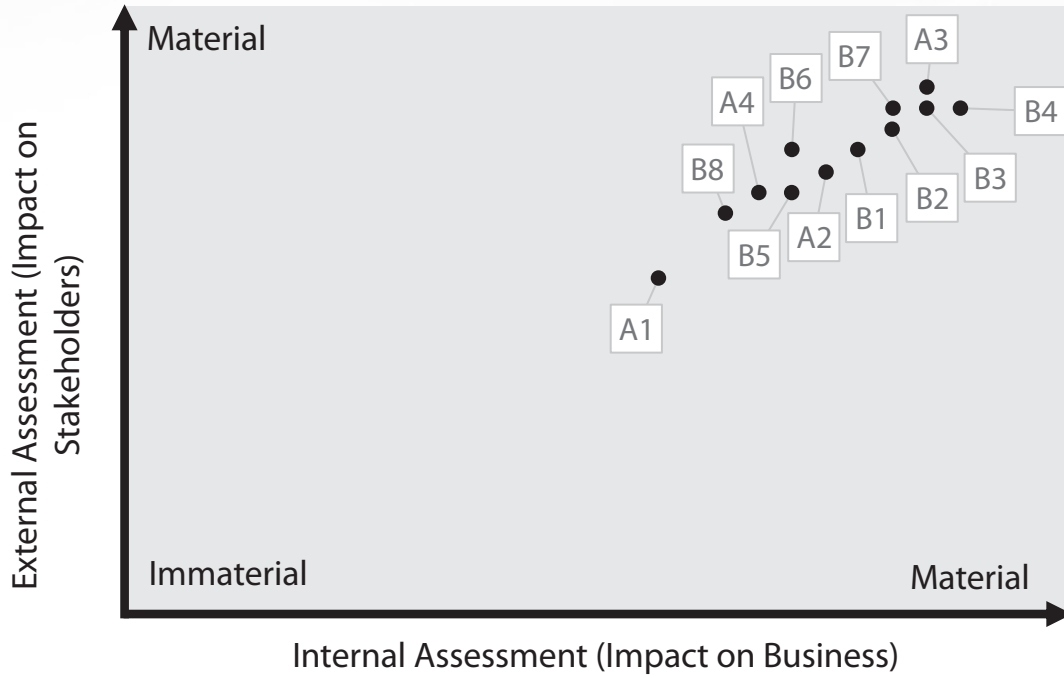
In managing the priorities, the Group continues to ensure its operations comply with environmental and social responsibilities and obligations as required by the ESG Reporting Guide, the laws and related regulations of Singapore, and the specific guides applicable to the buildings and civil engineering industry. The Group values stakeholders' opinions and actively works to address their concerns through established communication channels as listed below:

| Stakeholders | Communication Channels |
|---|---|
| Shareholders/Investors | <ul style="list-style-type: none">• General meetings• Information published on websites of the Company and the HKEx• Direct emails or phone enquiries• Dispatched documents |
| Employees | <ul style="list-style-type: none">• Direct meetings with the management executives• Emails• Annual and regular appraisal• Organized functions and activities for the employees |
| Customers | <ul style="list-style-type: none">• Day-to-day communication through front line staff• Direct emails or phone enquiries• Official websites |
| Suppliers/Service providers/ Professional advisors | <ul style="list-style-type: none">• Day-to-day communication through front line staff• Regular review of the signed arrangements by the management |
| Industry associations | <ul style="list-style-type: none">• Participation in annual and regular meetings, conferences, events, etc. |

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

Materiality

For 2023 Reporting Period, the Group has identified the following material ESG areas and aspects:



| Subject Areas | | Subject Aspects |
|---------------|---------------------------------|---------------------------------------|
| Environmental | | A1. Emissions |
| | | A2. Use of Resources |
| | | A3. Environment and Natural Resources |
| | | A4. Climate Change |
| Social | Employment and Labour Practices | B1. Employment |
| | | B2. Health and Safety |
| | | B3. Development and Training |
| | | B4. Labour Standards |
| | Operating Practices | B5. Supply Chain Management |
| | | B6. Product Responsibility |
| | | B7. Anti-corruption |
| | | B8. Community Investment |
| Community | | |

Through the Group's established management structure, process, policies and guidelines as aforementioned and described, the above ESG material areas and aspects have been strictly managed and monitored. A summary of these efforts is provided below:

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

ENVIRONMENTAL, SOCIAL AREAS AND ASPECTS

(A) ENVIRONMENTAL AREAS AND ASPECTS

Singapore has a stringent statutory control regime on the various matters which are covered by the ESG Report. Our Group, in pursuit of sustainable business practices and higher level of contractor registration, implements initiatives to actively participate in, promote and uphold environmental protection and social responsibilities.

The Group takes on an active role to ensure a sustainable and environmentally friendly production and operating process by taking all practicable and possible measures to comply with the relevant national laws and regulations. The Group actively assumes social responsibilities to reduce pollution by setting reasonably practicable objectives. The Group translates this policy into achievable goals during the planning, design and production stages of its construction projects. The Group takes all measures to ensure that there is no breach of national legal requirements which are our minimum standard.

A1. Air Emissions and Waste Discharges

(i) Hazardous and Non-Hazardous Air Emissions

The Group's limited operational activities result in the generation of greenhouse gases ("GHG"), noise, waste and effluents. To minimise these impacts, the Group adopts industry standard measures and continuously explore practical means of mitigation in our operations. The Group continues to use relatively clean operating processes, steel reinforcement and concreting. However, insignificant amounts of emissions are inevitably generated from diesel fuel at the construction sites on a temporary or interim basis when city power supply is unavailable. Off the construction sites, the fleet of specialized trucks that use diesel fuel to transport construction materials to and from the construction sites is the sole source of direct hazardous and non-hazardous greenhouse gas emissions.

The Group has taken measures to minimize the adverse impacts on the environment, prevent pollution, and enhance efficiency in energy and other resources usage. The key measures for offices and construction sites are summarized below:

| Offices: | Construction sites: |
|---|---|
| <ul style="list-style-type: none"> Switch off electrical appliances when they are not used or needed | <ul style="list-style-type: none"> Turn off the trucks, cranes and generators when they are not used or needed |
| <ul style="list-style-type: none"> Use electrical appliances and light bulbs with energy saving capabilities | <ul style="list-style-type: none"> Use electrical appliances and light bulbs with energy saving capabilities |
| <ul style="list-style-type: none"> Promote "Energy charter on Indoor Temperature" by maintaining an appropriate temperature to reduce energy consumption | <ul style="list-style-type: none"> Use solar energy whenever possible |
| <ul style="list-style-type: none"> Conduct regular energy consumption check | <ul style="list-style-type: none"> Conduct regular energy consumption check |

The regulations governing the release of hazardous and nonhazardous air emission, effluent discharge and disposal of wastes from the construction sites to the environment is rigorously enforced at a national level. The site emissions and discharges are subject to constant and unannounced site inspections and surveillance of various government departments. The efficacy of control measures is subject to constant and virtually real time monitoring on site by using modern sophisticated equipment. Any adverse results or warning alarms will receive immediate attention of the site staff. Consequential reviews by different management levels to cope with areas warranting attention and action are undertaken in progress meetings. The Group's dedication and diligence in compliance results in no breach or offence spotted by the law enforcing departments on pollution control and emissions.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

During the Reporting Period, the Group has generated hazardous air emissions and non-hazardous GHG directly from vehicles and gaseous fuel consumption, for example, consumption of fuels by lorries transporting of workers to and for work, use of specialized trucks for lifting, shifting and transporting galvanize pipes and machinery and building construction materials between construction sites, mobile cranes and generator to supply power supply in construction sites. Direct hazardous air emissions includes sulphur oxides (“SO_x”), nitrogen oxides (“NO_x”) and particulate matter (“PM”) and non-hazardous GHG emission includes carbon dioxide (“CO₂”). The use of electricity will also indirectly generate non-hazardous GHG emission of CO₂.

Intensity comparison of the direct and indirect greenhouse gas emissions on a site basis may not be meaningful owing to the variations in site sizes, complexity of engineering requirements, site constraints, etc. The number of sites having comparable parameters is insufficient for meaningful intensity analysis.

The following table summarises the quantities of hazardous and non-hazardous air emissions during the Reporting Period with comparison with the last reporting period from 1 January 2022 to 31 December 2022 (the “**Last Reporting Period**”):

| | Type of air emission | Unit | 2023 Quantities | 2022 Quantities | Variation |
|-----|-----------------------------|-------------|----------------------------|----------------------------|------------------|
| (A) | Hazardous (Direct) | | | | |
| | SO _x | tonnes | 0.00 | 0.00 | N/A |
| | NO _x | tonnes | 0.56 | 0.46 | 21.74% |
| | PM | tonnes | 0.04 | 0.03 | 33.33% |
| (B) | Non-Hazardous | | | | |
| | CO ₂ (Direct) | tonnes | 43.92 | 47.89 | -8.29% |
| | CO ₂ (Indirect) | tonnes | 100.17 | 82.59 | 21.29% |
| | CO ₂ (Total) | tonnes | 144.09 | 130.48 | 10.43% |

Hazardous direct emission and non-hazardous indirect emission increased as more projects were carried out during the Reporting Period. On the other hand, non-hazardous indirect emissions has decreased by 8.29% due to reduced usage of gaseous fuel which was mainly for daily kitchen use. The decrease in the Reporting Period was due to reduced cooking.

For coming year, we target to reduce the direct emissions, especially those hazardous SO_x, NO_x, PM, and CO₂, and indirect emissions by 1-2%.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

(ii) *Hazardous and Non-hazardous Wastes Discharge and Disposal*

Other than construction wastes from the construction projects, which are generally low hazardous wastes, the Group operations do not generate any other hazardous waste.

Work practice and production systems are in place for all construction waste produced to be collected and disposed of by licensed contractors. During the Reporting Period, no adverse comments or irregularities have been reported from the internal and external control sources. With the exception of Internos, non-hazardous waste typical of general office nature is produced in all other group operations. Internos produce construction waste common to its industry peers which are dealt with and disposed of in the normal industry practice manner.

All non-hazardous wastes are taken care of by the local waste collector. Contemplations could be given to enhance recycling and reuse in the various processes and stages of production. As a guiding rule and principle, raw materials used by Internos are carefully estimated and calculated by competent and experienced professionals during the planning and design stages. Close supervision is exercised in the production stage to minimize unnecessary wastage and achieve cost saving.

Intensity comparison for this KPI on a site basis may not be meaningful owing to the variations in site sizes, complexity of engineering requirements, site constraints, etc. The number of sites having comparable parameters is too minimal for meaningful intensity analysis.

Apart from the construction sites, other operational activity of the Group only generate non-hazardous general wastes, such as used papers, stationery and packaging materials, office residuals, general rubbish and hygiene and living wastes by its employees. All these wastes are disposed to rubbish bins and stored in rubbish depots and are collected by the city urban waste services on a daily basis.

Same as the previous two years, the Group did not receive any complaints or warnings on its wastes disposal for the Reporting Period, and targets to achieve the same performance in the coming year.

(iii) *Noise Emission*

The operations of our construction work do generate noises; however, they are all within national and local environmental acceptable limits. The emitted noises do not cause significant noise pollution to local residents. The Group has complied with all the national and local laws, rules and regulations to ensure noise emission is under strict control.

Same as the previous two years, the Group did not receive any complaints related to noise emission for the Reporting Period, and targets to achieve the same performance in the coming year.

(iv) *Light Emission*

The operations and activities of the Group do not generate and emit light pollution.

As in the previous two years, the Group did not receive any complaints related to light emissions for the Reporting Period, and targets to achieve the same performance in the coming year.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

(v) *Mitigation Measures on Emission and Results*

As a responsible corporation, we are conscious of the effects our operations may have on the environment at all times and constantly strive to maximise energy efficiency and minimise waste. The main sources are emissions from vehicles and diesel generators. The equipment is rented from and maintained by reputable quality suppliers. Only equipment complying with the very stringent statutory emission standards is used. It is therefore pertinent to source a reliable equipment and site staff is vigilant on emissions from the generators. Furthermore, all our vehicles have been checked regularly on safety and air emissions from fuel combustion and have passed all the tests with valid warranties obtained.

Furthermore, we have incorporated environmentally friendly measures into our daily operations to reduce and prevent adverse impacts on our environment. We encourage economical and recycling use of resources to prevent resource wastage. We have implemented the following measures to prevent and to reduce the generation of air emissions and solid wastes disposal, as well as to save energy and resources and costs in our daily operations.

- Appoint responsible officers to regularly inspect our offices and operations to ensure power is turned off when works are not being carried out, and the use of natural ventilation to replace air-conditioning in allowable conditions;
- All levels of the Group are reminded of and educated on the importance of the 3-R guiding principle of reduce, reuse and recycle; and
- Implement a waste-classification system and the practice of recycling use of resources especially on printing papers.

The efficacy of control measures is subject to constant and virtually real time monitoring on site by using modern sophisticated equipment. Any adverse results or warning alarms will receive immediate attention of the site staff. Consequential reviews by different management levels to cope with areas warranting attention and action are undertaken in progress meetings. The Group's dedication and diligence in compliance results without breach or offence spotted by the law enforcing departments on pollution control and emissions. During the Reporting Period, we fully comply with all the national and environmental laws, rules and regulations and instructed standards and there have been no complaints or breaches recorded by law enforcing departments.

A2. Use of Resources

The Group has yet to consolidate an overall policy on the efficient use of resources (energy, water and other raw materials) though the Group has good experience in achieving this objective. The Group adopts and implements the 3-R principle – to reduce, reuse and recycle as far as possible in promoting and achieving efficient use of energy, water and other raw materials. Full measures are in force with recognizable results and industry awards.

All levels of the Group are mindful of the importance of energy saving and its implications to the society and the planet. Measures are integrated into our production needs and goals. Educational programs and instructions are at present the main driving force in this aspect in the Group.

Same as the last two years, the Group did not find any abnormal or excessive uses of resources which were all within our internal control targets. The Group is confident that we continue to have maintain this level of standard in the coming years.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

(i) Direct and Indirect Energy Consumption

The Group relies on city electricity supply which is the only and direct source for general use in office and dormitory. The Group enjoys its constant source and reliable supply. In situations where city electricity supply is not readily available to construction sites, Internos will rely on diesel generators for power supply to meet operational needs. This operation mode is in line with common industry practice in Singapore.

| Consumption | Unit | 2023 Quantities | 2022 Quantities | Variation |
|--------------|--------------|--------------------|--------------------|-----------|
| Electricity | kWh | 246,899 | 203,577 | 21.28% |
| Diesel fuel | litres | 14,887 | 16,024 | -7.10% |
| | kWh | 159,339 | 171,509 | -7.10% |
| Gaseous fuel | cubic metre | 906 | 1,087 | -16.65% |
| | kWh | 6,581 | 7,896 | -16.65% |
| Total | kWh | 412,819 | 382,982 | 7.79% |
| Intensity | kWh/employee | 517.97 | 617.71 | -16.15% |

As Singapore government has eased COVID-19 measures, the employees were arranged to work in office. Furthermore, the Group has hired more employees for the upcoming projects leading to increasing consumption of electricity for daily usages and operational usages. On the other hand, the diesel fuel consumption has decreased due to some of the construction projects were completed during the Reporting Period. The usage of gaseous fuel, mainly for daily kitchen use, has decreased due to reduced cooking.

(ii) Water Consumption

The Group relies totally on city water supply for production and general use for all its operations and activities. City water supply is also the only source for both office and dormitory and we do not have any problem on sourcing of our water needs.

We encourage our staff and workers to efficiently use fresh water as it is one of the most important scarce resources. We have requested our staff and workers to regularly inspect the facilities to ensure they are in good conditions and that all the water taps have been turned off when they are not in use, and to check and to immediately remediate any water leakage.

For the Reporting Period, the Group has consumed 13,897 cubic metre (2022: 17,415 cubic metre) decreased 3,518 cubic metre or approximately 20% when compared to the Last Reporting Period. The decrease in usage of water was mainly because of reduce in cooking during the Reporting Period. Intensity comparison for this KPI of different sites on water consumption is not achievable or meaningful owing to too many variables. Site parameters may vary from one to another and overall site engineering requirements and technical complexities are not always the same.

The Group will continue to monitor this KPI closely and target to reduce our water consumption overall by 2% in the next operating year.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

(iii) Paper and Packaging Materials and Use of Other Resources

There are minimal packaging materials involved in the construction sites of Internos, whereby finished products are building construction items. In other operations of the Group, packaging materials for finished products do not pose a significant impact on our operation. In sourcing our packaging materials in our other operations, the Group adopts the view that it must be fit for purpose in the first place and meet with our specification. Non-toxicity and environmental friendliness are our keen concern. These issues are under the constant attention and review of the various end users of the Group.

Plywood is identified as the most common natural resource used by our construction operation for formwork. For cost and environmental resource saving purposes, we recycle and reuse plywood for different projects until they are not suitable for further use. We will then dispose of them as waste to specialized waste collectors. During the Reporting Period, we used a total of 17,841 pieces of plywood (2022: 6,922 pieces). The increment was because most of the projects were running at the peak progress during the Reporting Period.

In today's complex construction industry context, it is inevitable to use paper due to the nature of works, whereby we need to print drawings, details, etc., for site supervision purposes. In addition, daily hardcopies of documents need to be kept on site, such as daily toolbox meeting records, inspection forms, progress reports and claims, etc. The Company keeps a record of reams of papers used. For cost saving and environmental protection purposes, the Company has encouraged the employees to replace and reduce the use of paper by electronic means. During the Reporting Period, the Group used a total of 510.7 reams or 1.278 tonnes of paper (2022: 574 reams or 1.435 tonnes of paper).

A3. Environment and Natural Resources

Electricity and diesel, fresh water, paper and plywood are considered to be the key elements affecting natural resources. The Group and each construction project site manager have a clear recognition of this. In conjunction with the measures to reduce, reuse and recycle, the Group and each construction site managers are constantly on the alert to look for ways and means to accomplish the 3-R achievable goals. In addition, the Group and each construction project manager are clearly driven by the cost-saving incentive to reduce resource consumption.

All waste water from the construction sites is considered to have a negative impact (though the amount and nature are insignificant) on the environment. It is the policies and site requirements of Internos to ensure that all waste water is treated to meet the required discharge standard before discharge. The stringent government control and heavy penalty are another driving force for diligence in compliance by the Group and Internos. Other business of the Group does not produce waste water of significant impact to the environment in their operations. Waste water from offices is discharged into the building plumbing system and government drainage system. Indirect greenhouse gas of CO₂ and direct gases of CO₂, SO_x, NO_x and PM emissions from diesel generators and trucks during operation are also considered to have an impact on the environment as far as all the Group operations are concerned. Reduction (especially for efficient and smart uses), reuse and recycling measures, where appropriate and practicable, are the main approaches which our Group would consider to implement in all companies' operations and integrate with our production goals and policies. The Group has complied with all the national and local environmental laws, rules and regulations, and industry standards during the Reporting Period.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

A4. Climate Change

The Group understands that stakeholders expect us to be managing and mitigating climate change risks in line with local and global commitments and recommendations. After communication with the stakeholders and reviewing of the Group's operations and activities in light with the current global environmental conditions, the Board identifies that global warming and reduction on the use paper and paper related packaging materials will be the most significant climatic issues that may impact the Group.

It is generally agreed that global warming is mainly caused by the excessive release of CO₂ into the atmosphere, which is directly and indirectly the result of uses of fossil fuels for transportation and electricity generation.

Faced with the global climate change risks and the international trend and challenge of reducing greenhouse gas emissions, the Group deeply understands the needs to cooperate with the overall industry and its upstream and downstream supply chain, to align with the national policies of each region, and to discuss with customers and supply chain about the new construction process technology for sustainable production, as well as new opportunities for energy conservation and carbon reduction. We have implemented policies and measures to use electricity efficiently to reduce CO₂ emission, which is a main contributor of global warming. Through reduction on usage of paper and packaging materials, we wish to indirectly reduce the cutting of trees, which will directly assist on curbing global warming as well.

For the Reporting Period, the Group's business operations and activities did not lead to any events or issues that might impact the climate or result in the change of the climate significantly. The Group has already taken measures to lower air emissions, and to reduce paper and paper-related packaging materials usage with a wish to curb global warming. The Group will continue with such measures for the coming year.

(B) SOCIAL AREAS AND ASPECTS

B1. Employment

(a) Policy

The Group has established and implemented policies, standards and guidelines that emphasize the protection of labour welfare and compliance with national laws and standards. They cover, but are not limited to, appointment and termination, working hour and rest day, paid leave and statutory holiday, compensation and dismissal, health and general safety and other benefits and welfare. They are clearly stated in the Group's employee handbook (the "**Employee Handbook**") and can be summarised as follows:

- (i) The Employee Handbook contains the whole range of various national labour laws, guidelines, codes of practice and safety standards applicable to the Group's operations and business which are considered to have significant impact to the Group.
- (ii) Compliance of the statutory requirements is the minimum standard of the Group and to be observed at all levels.
- (iii) The Group ensures that policies and regulations covering a comprehensive range of employment protection and benefits are in place and being observed at all levels.
- (iv) The Group recognises that staff are an important asset to its success and sustainability and commits to providing fairness to all staff on recruitment, promotion, compensation and benefits; promoting a harmonious and respectful workplace.
- (v) All employments are entered into with proper and standardized contracts in writing between the respective staff and the Group. The human resources department is responsible for ensuring statutory obligations of the Group are fulfilled and complied with in a timely manner.

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- (vi) To ensure a fair and rational human resources structure, the Group has established job qualifications and requirements specific to each job position in the construction site projects or within the Group. They are taken as criteria for recruitment, promotion and transfer. The recruitment and decision-making process involve both the relevant operational levels and the human resources department.
- (vii) In accordance with the requirements of the national laws of Singapore, the Group provides and maintains statutory benefits to all qualified staff, no matter whether they are introduced or otherwise, including but not limited to Central Provident Fund, medical and work injury insurance and compensation and statutory holidays.
- (viii) Employee remunerations are determined with reference to the prevailing market level and in line with their competency, qualification, skills and experience. Salary is paid to the employee bank account within the prescribed agreed period at the end of the wage period. In exceptional cases, salary will only be paid in cash to employees.
- (ix) The Group opens up opportunities for employees to move on in their vertical and horizontal career path. The composition of the Group's employees is normal and no anomalies in gender and age are found.

(b) Compliance with the relevant laws and regulations that have a significant impact on the Group

The Group being a reputable and honest employer with full integrity maintains a policy of strict compliance with all employment laws and requirements. The human resources department is responsible for this compliance through its recruitment process at the source and ensure that all established benefits, welfare and employment terms are carried out correctly and fairly. No breach of labour laws or labour disputes were recorded both internally and externally during the Reporting Period.

(i) Employment Mix

During the Reporting Period, the Group employed a total of 797 employees from Singapore and Hong Kong.

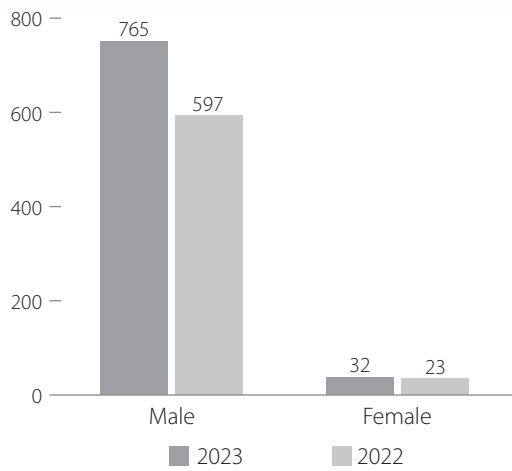
The Group recognizes its success and depends highly on the skills, passion and commitment of its employees. We consider that our employees and their intrinsic talent are important resources and assets. Given our policy of equal opportunity and treatment and anti-discriminatory to gender, origin, religion and races, our employees from different countries, cultures and religions worked together amicably and pleasantly without any record of complaints or disputes.

As at 31 December 2023, the Group employed a total of 797 employees, among which 797 full-time staff and no part-time staff. During the Reporting Period the Group hired additional 177 (increased by 28.55% of total headcount when compared to Last Reporting Period) for the peak progress of the projects of the Group.

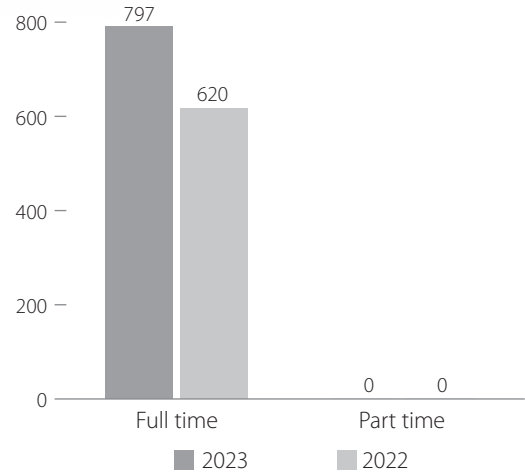
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Further analysis of the Group's employment situations for the Reporting Period and comparison with the Last Reporting Period are summarised below:

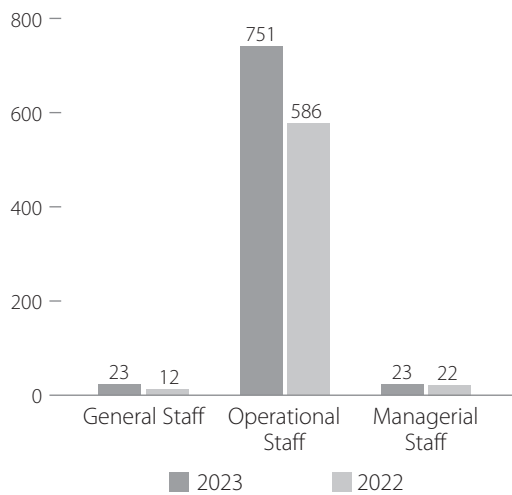
Number of Employee by Gender



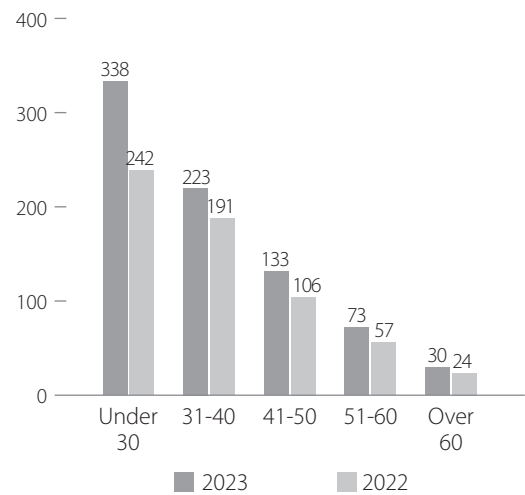
Number of Employee by Employment Type



Number of Employee by Employment Role

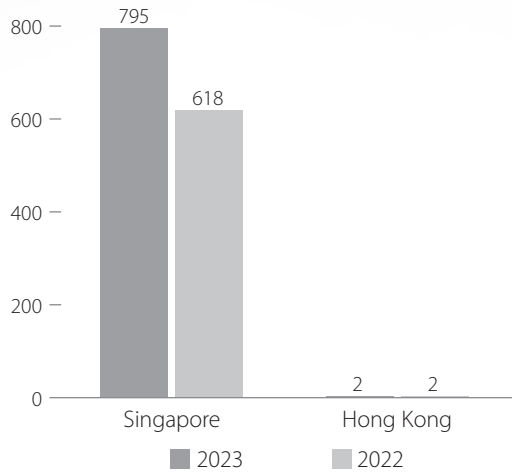


Number of Employee by Age



ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

Number of Employees by Geographical Region

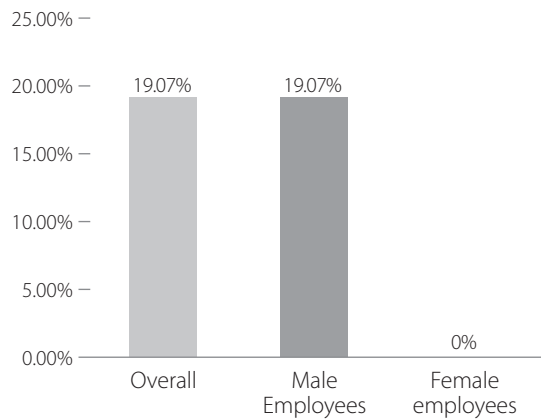


The Group honoured all obligations to our employees including but not limited to the payment of salaries and wages, holidays and leave, compensation, and insurance for the Reporting Period.

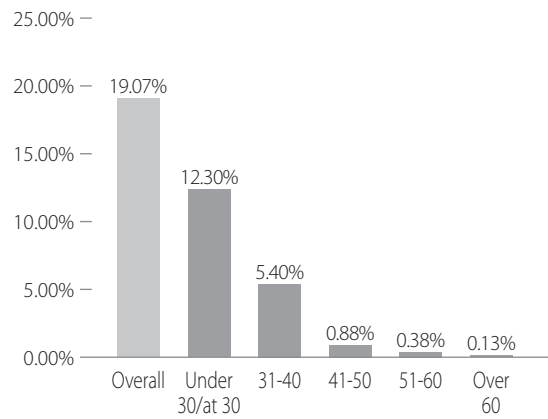
(ii) *Employee Turnover Rate*

For the 2023 Reporting Period, 152 of the Group’s employees left voluntarily for career development. A breakdown of the turnover rates by gender and age is stipulated below:

Employee Turnover Rate by Gender

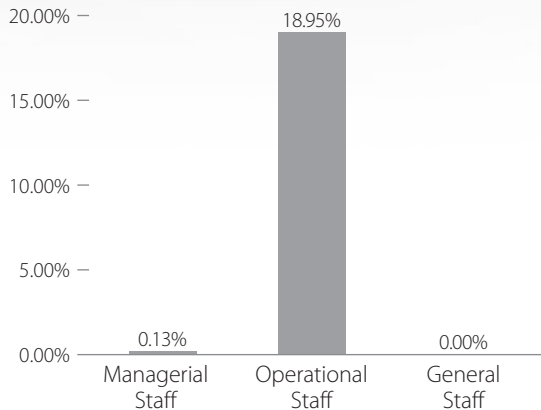


Employee Turnover rate by Age

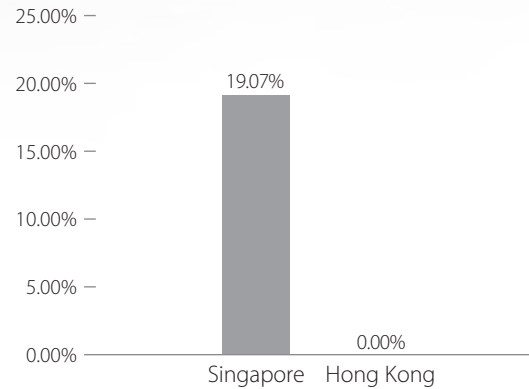


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Employee Turnover rate by Employment Role



Employee Turnover rate by Geographical Region



B2. Health and Safety

(a) Policy

The Group at all times provides a safe working environment to prevent staff and workers from injuries and accidents, and adopts an “employee-oriented” human resources policies which aim to provide a happy, harmonious, safe and healthy working environment to minimise the risk of any occupational hazards. Work safety rules and policies have been implemented, which are in all material aspects in compliance with all the relevant laws, rules and regulations relating to safety and health requirements of Singapore and Hong Kong including the Work Safety and Health Act (“**WSHA**”) and Work Injury Compensation Act (“**WICA**”) (Cap 354) of Singapore, and Occupational Safety And Health Ordinance (“**OSHO**”) (Cap 509) and Employees Compensation Ordinance (“**ECO**”) (Chapter 282 of the Laws of Hong Kong) of Hong Kong. The Group has assigned safety officers to regularly inspect and to alert employees to take precautionary measures to ensure that the workplace is safe.

In accordance and in compliance with the statutory requirements of Singapore, the Group has maintained group hospitalisation, surgical and outpatient policies for all the internal employees and outsourced employees employed by the Group in Singapore as stipulated by the Ministry of Manpower of Singapore. In Hong Kong, the Group maintains employee compensation insurance that includes work injury for our employees in Hong Kong under regulatory requirements. These policies and insurance compensation cover all qualified employees to protect their safety and health against occupational hazards, accidents and sickness.

The Employee Handbook sets out general safety policies and procedures. Operation manuals for the respective plants and production operations contain safety rules and regulations for safe operations. All employees are required to strictly observe the health and safety policies, instructions and guidance and to follow the same at work and to place safety as their priority over production. Managers and supervisors are responsible for enforcing the safety policies, rules and practices.

The Group has also equipped the offices and sites with adequate equipment and facilities to ensure safety and convenience to our staff and workers.

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(b) *Compliance with Relevant Laws that have Significant Impact*

Compliance with the relevant statutory provision of the law is the topmost priority in our business goals. The Group has provided necessary insurance for all qualified employees, foreign or local staff in accordance with the statutory requirements.

For the past three years including the reporting year, the Group reported no serious work-related injuries or death incidents, and there were only a few minor work injuries which were unavoidable based on the nature and circumstances of our works. As there were only minor injuries, no lost days were reported during the Reporting Period. The Group is proud of its no death and low number of accidental work-related injuries which is the result of our strict on-site safety and health measures, practices and management.

The Group provides the construction sites with all the required safety equipment and facilities and has passed all the governmental safety inspections. In case of accidents, regardless of its nature of being minor or serious, employees are required to notify their superiors immediately in accordance with internal rules, who will take appropriate measures to ensure safety is not being compromised.

Internal rules require all injuries or accidents to be promptly reported and properly dealt with in accordance with the national laws. Parallel remedial or compensatory actions arising from safety and health issues or work injuries are required to be taken immediately where necessary as stipulated by the internal rules.

The Group did not have any record on any claim disputes regarding compensation or work-related injury investigation by the government officials in the Reporting Period.

B3. Development and Training

The Group recognizes the value and contribution of our employees and is committed to investing in staff training and development.

It is the policy of the Group to provide the required level of training in terms of skills and job knowledge, plant operation and production know-hows to employees, local or foreign, at various levels so that they are able to perform their job duties in a competent and capable manner without risk to their health and safety or damage to plants and operations.

Policies are in place for on-the-job training to ensure that tacit knowledge and skills are provided in a timely and appropriate manner to meet production and staff needs. Employees are encouraged to engage in self-development by taking external training programs and seminars. The Group may sponsor the cost, in part or as a whole, of such training programs.

For foreign workers, it is the policy of the Group to comply with the stipulated safety training requirements by attending recognized external training providers before employment and internal induction training and tool-box talks are mandatory for all site workers.

A training record detailing the types of programs offered and sponsored has been established and kept as a KPIs for the management to review regularly in response to improving the performance and efficiency of employees.

During the Reporting Period, Internos provided training courses to our existing and new employees across all levels for the purposes of improving their working skills and most importantly, their safety knowledge.

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Below is the breakdown stating the percentages of employees trained during the Reporting Period by gender and operation role:

| | Internal | External |
|---|----------|----------|
| % of employee trained | | |
| 2023 | – | 57.09% |
| % of employees trained by gender | | |
| Male | | |
| 2023 | – | 59.48% |
| Female | | |
| 2023 | – | 9.38% |
| % of employees trained by operational role | | |
| Managerial staff | | |
| 2023 | – | 21.74% |
| Operational staff | | |
| 2023 | – | 60.32% |
| General staff | | |
| 2023 | – | 0.00% |

Below is the breakdown stating the hours of training provided during the Reporting Period and the Last Reporting Period by gender and operation roles:

| | Internal | External |
|---|----------|----------|
| Average training hours per employee | | |
| 2023 | – | 9.18 |
| Average training hours by gender | | |
| Male | | |
| 2023 | – | 9.52 |
| Female | | |
| 2023 | – | 1.00 |
| Average training hours by operational role | | |
| Managerial staff | | |
| 2023 | – | 12.00 |
| Operational staff | | |
| 2023 | – | 16.02 |
| General staff | | |
| 2023 | – | 0.00 |

Note 4: Since 2021, we started reporting the average training hours for employees calculation for better comparability and performance tracking.

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B4. Labour Standards

(a) Policy

The Group adopts the national statutory standard as its minimum labour standard on labour protection and welfare. The Group is committed to ensuring its full compliance. In addition, the Group adopts a serious view and attaches great importance to the compliance of statutory duties and obligations as an employer.

The employment of child labour, illegal workers and forced labour is strictly prohibited through the recruitment and employment process. The Human Resources department has been solely authorized to perform this statutory duty and is being oversighted by the senior management with constant reviews regularly.

All job applicants are required to submit their credentials such as academic qualifications, professional skill certificates, references and identity card for verification and record purpose during recruitment.

During the Reporting Period, no case of any child labour or forced labour employment was reported or detected. For the coming year, we will continue maintain our zero tolerance to forced and child labour.

(b) Compliance with Relevant Laws that have Significant Impact

The Group strictly adheres to the national laws on labour protection to ensure employee health, safety and welfare during their employment. The Group also pays wages and salaries, benefits, compensation payments and insurance on time within the prescribed period.

The Group has fulfilled all of its obligations towards staff and no disputes or litigations on labour matters were reported for the Reporting Period.

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B5. Supply Chain Management

(a) Policy

The Group has its purchase policies implemented on its ISO system and opens its purchase matters to all suppliers on a fair and equitable manner. All purchase transactions are open and transparent. They are subject to the scrutiny of internal supervisions at different levels depending on its contract value and significance and to the overall scrutiny of external independent audit.

(b) Management

Our purchases in the usual course of business are concluded with reputable and reliable local suppliers as much as possible so as to reduce our carbon footprint.

All purchases of the construction projects in principle follow the established prevailing trade practices and industry norms by inviting a number of tenderers depending on the contract value, time and amount involved and other technical or time constraints. They are executed and documented in accordance with the internal rules which predominantly attach importance to its fit for purpose, safety and reliability. Many contract specifications ask for green materials or environmentally friendly provisions which our Group are obliged to comply. Other considerations are price competitiveness, availability and reputation of the suppliers. Suppliers are chosen based on their continuous ability to guarantee satisfactory product quantity and quality, reasonable price and timely delivery, and new suppliers are required to provide relevant certifications/documents and track records.

The Group is well aware that quality and standard of the incoming construction materials are crucial and instrumental to our end product quality and our performance rating. The Group ensures that specification stipulation policy and verification procedures as stipulated by the contracts are closely followed and where necessary complemented by prevailing trade practices or third-party consultant advice. This policy and approach have been strictly applied where applicable in the procurement or tender process.

Incoming key construction materials include but not limited to plywood, timber, steel products (pipe, rod, wire, etc.), cement, machines, electric and hand tools, polythene sheet and poly foam, etc., are delivered on site and subject to our own quality assurance supervisory checks in addition to normal project management quality assurance. As far as the warranty and permit terms in project contracts allow, the Group may impose a condition in the procurement documents to reserve the right to inspect and examine raw materials before purchase or delivery.

During the Reporting Period, the Group purchased materials significant and crucial to its construction project 100% from domestic reputable suppliers with existing sources as far as practicable.

The Group does not foresee its source of supplies to be a potential threat to our construction project operations.

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B6. Product Responsibility

(i) Product Quality

(a) Policy

The Group's end products are finished building or construction parts which are subject to stringent government control and independent consultant supervision and inspection during the planning, design and construction stages. Most of the risks regarding defaulted end products (whether on health and safety issues or deviation from specifications) are detected in a timely manner. Such risks are reasonably minimized by the existing industry checking practices and our internal supervision plans.

(b) Compliance with Relevant Laws that have Significant Impact

The Group is committed to providing high quality end products as we realize that the quality and consistency of our products are critical to our ability to maintain our professionalism and to expand market shares. Great importance is attached to the safety standard of our products. Internos maintain close contact with our business peers in the trade to keep abreast of the latest building construction technology and knowledge.

To enhance safety and quality of our products and staff safety, the Group has acquired and obtained various certifications and recognitions in various areas like safety, quality management, and environmental management including ISO 9001:2015 Quality Management System, ISO 14001:2015 Environmental Management System and ISO 45001:2018 Occupational Health and Safety Management System. BizSAFE STAR Certificate recognizes that Group's Workplace Safety and Health Management System (WSHMS) identifies, manages and controls workplace risks or hazards in compliance with the Workplace Safety and Health (WSH) Act and international standards such as ISO 45001. Also, manuals, policies and procedures are in place to ensure that all customer complaints or concerns are addressed at the appropriate levels and in a timely manner.

Over the last 5 years the Group continuously received the following awards especially in relation to safety and quality from both private and public sector clients:

Samsung C & T Corporation:

- Best HSE Conscious Subcontractor Award

Penta Ocean/Bachy Soletance JV:

- 2 Million Hours LTI Free Celebration Award
- 3 Million Hours LTI Free Celebration Award
- 5 Million Hours LTI Free Celebration Award
- 9 Million Hours LTI Free Celebration Award in the Reporting Period

Land Transport Authority of Singapore:

- Subcontractor Safety Recognition

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In order to ensure quality outcomes and to reduce any undesirable effect of any contract signed, and to achieve continual improvement, the managing director/general manager and department heads have to consider the external and internal issues and understand the needs and expectation of interest parties to determine the risks and opportunities to evaluate the potential impact on the conformity and quality of the products/services and design of the environmental system actively. During the Reporting Period, the Group did not have quality claims nor complaints on our products and services which had an adverse impact to our business.

(ii) *Intellectual Property Rights*

Given the nature of our works, intellectual property rights are not a significant issue to the Group, nevertheless, the Group observes and respects all intellectual property rights by purchasing original computer software for usage in offices and work sites.

(iii) *Privacy*

(a) Policy

The Group's construction contracting business does generate private, confidential and sensitive information of the principals and their projects such as design, costs and commercial terms of contracts. We also have confidential information on our business partners, sub-contractors and employees. These types of information are extremely sensitive and important, and pursuant to law, we have to cautiously keep and safeguard them.

(b) Compliance with Relevant Laws that have Significant Impact

The Group is fully aware of our obligation, and has taken measures to ensure safe keeping of the information. The leakage and loss of the information to outsiders come mainly from two sources – internal negligence and theft, and external theft through hacking of the information system. For the former, the Group has cautioned our employees not to access without approvals and/or to leak and to handle confidential information carefully. Legal actions will be taken on any violation. For the latter, to act against external theft, the Group has authorized the IT Department to continuously monitor, maintain and update hardware, software and security systems to prevent hacking attacks at any times. No privacy information leakage was reported during the Reporting Period.

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B7. Anti-corruption

(a) Policy

The Group is well aware of the importance of honesty, integrity and fairness in its operations and has in place an anti-corruption policy. Employees at all levels are constantly reminded in meetings and documents, such as the Employee Handbook, on corruption, conflict of interest and giving and taking of interests.

(b) Compliance with Relevant Laws that have Significant Impact

Staff are required to declare any conflicts of interest in the execution of their roles. Through formulating these rules and guidance, the Group encourages all employees to discharge their duties with integrity and comply with the relevant national anti-bribery laws and regulations.

Transactions in large monetary sums are processed through bank transactions which require authorized signatories and approval of the appropriate levels depending on the amount involved.

Check and balance systems are in place in the Group for money transaction activities and are considered effective and adequate. The report of the independent external auditor has no adverse comment on this aspect. Money laundering should not be our concern and there were no enquiries or concerns from the government or banking officials.

During the Reporting Period, the Group recorded no bribery, corruption charges or laundering enquiries.

B8. Community Investment

The Company fully understands our social obligations and the need for giving back to the society. The Company has and will continue to provide a large number of employment opportunities to the unskilled and semi-skilled workers of the Asian developing countries and provide training to them so that they can build a decent life thereafter. The Company has organized birthday parties, lunches and dinners frequently in appreciation and honour of our employees. Through the day-to-day contact with various government officials and industry leaders, the Company will continue to explore and examine what and how the Company can contribute more to the local community and society. The Company is committed to developing more community and society investment opportunities in our development plans.