



OXLEY HOLDINGS LIMITED



# SUSTAINABILITY REPORT 2025

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# CORPORATE PROFILE

Oxley Holdings Limited (the “Company”, and together with its subsidiaries, “Oxley”, the “Group” or “we”) is an international property group incorporated in 2010 and headquartered in Singapore. The Group specialises in the development of quality residential, commercial, industrial and hospitality projects. These developments are typically located in choice areas that are easily accessible. Most of its projects incorporate retail elements, as well as lifestyle features and facilities.

Oxley is listed on the Main Board of the SGX-ST (SGX: 5UX) and has a market capitalisation of approximately S\$0.4 billion as at 15 September 2025. Since its incorporation, Oxley has launched a portfolio of 52 projects, of which 50 projects have been completed.

Oxley has a strong reputation in market foresight, execution, marketing and sales, which is evident in its project track record in Singapore in the past years. The Group has launched and sold more than 3,900 residential and commercial units in Singapore since April 2018.

For the hospitality segment, the Group owns the 254-room Novotel Singapore on Stevens and 518-room Mercure Singapore on Stevens which are located in a lush urban environment just minutes away from the iconic Orchard Road shopping belt and Botanic Gardens, a UNESCO World Heritage Site. The Group also owns the 303-room Shangri-la hotel in Phnom Penh, Cambodia.

Oxley has also been successful in expanding its footprint overseas. Currently, the Group has a business presence across six geographical markets including Singapore, the United Kingdom (the “UK”), Ireland, Cambodia, Malaysia and the People’s Republic of China (“PRC”).

## CONTACT US

We welcome feedback from stakeholders to help us improve the Group’s sustainability policies, processes and performance. If you have any enquiries, feedback or suggestions, please contact us at:



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# CHAIRMAN'S MESSAGE

Dear Stakeholders,

I am pleased to present the Sustainability Report of Oxley (the "report") for the financial year ended 30 June 2025 ("FY2025"). The Group's corporate strategy is underpinned by a commitment to create long-term, sustainable value for all stakeholders. To realise this objective, the Group places great emphasis on sustainability governance and integrates sustainable practices into all aspects of its business operations. In this report, we provide information on the economic, environmental, social and governance ("EESG") aspects of sustainability practices in our two major operating segments, namely property development and hospitality.

Environmental sustainability is a key consideration for the Group in the design and construction of all its residential, commercial and hotel properties. The Group strives to achieve green building certifications for all its buildings, taking a holistic approach to sustainability that includes energy and water management, materials selection and waste reduction. Our hotel operations are committed to leading the way in sustainable practices and minimising our environmental impact. In FY2025, we established a Sustainability

Management Plan that outlines our goals and objectives, identifies potential risks, and details corresponding strategies across various areas, including energy efficiency, climate change mitigation, waste reduction, procurement, staff education and awareness, as well as monitoring and assessment.

In addition, the Group is committed to addressing climate-related risks and opportunities and recognises the importance of providing transparent and decision-useful climate-related information to stakeholders. In alignment with the recommendations of the Task Force on Climate-related Financial Disclosures ("TCFD"), the Group has provided its disclosures on climate governance, strategy, risk management, and metrics and targets on a "mandatory" basis.

Alongside its commitment to environmental protection, the Group upholds the highest standards of fair employment and occupational health and safety. We believe that a diverse workforce brings a range of skill sets and experiences that can benefit the Group, and are committed to hiring employees of different ages, genders and nationalities to diversify our workforce. We value the contributions of all our staff and are committed to remunerating them fairly for their work. Additionally, our commitment to occupational health and safety is reflected in our selection of competent and committed contractors and suppliers who manage environmental, health and safety risks. We also strongly advocate for safe work practices among our contractors and suppliers to ensure the safety of our employees and stakeholders. The Group also strives to raise awareness within its workforce through sustainability-focused training programmes and activities, and encourages guests to participate in sustainability practices during their stay.

I would like to express our gratitude to our clients, business partners and shareholders for their unwavering support over the years. We look forward to your continued support as we strive to develop a more sustainable environment for all.

## **CHING CHIAT KWONG**

*Executive Chairman and Chief Executive Officer  
Oxley Holdings Limited*



# SUSTAINABILITY GOVERNANCE STRUCTURE

Oxley's Board and senior management consider sustainability issues as part of the strategy formulation of the Group. A Sustainability Task Force, comprising representatives from respective work teams, has been established to oversee the sustainability strategies and performance.

A summary of the sustainability targets and material assessment shall be included in the sustainability reports, which will be reviewed and approved by the Board on an annual basis.

Please refer to the Corporate Governance Report in our Annual Report 2025 for more information on corporate governance practices, precautionary measures and risk management structure.

## BOARD OF DIRECTORS



## SUSTAINABILITY TASK FORCE



## WORK TEAMS



Finance



Marketing



Project



Human Resource

# REPORTING PRACTICE

## REPORTING PERIOD, SCOPE AND FRAMEWORK

The Group publishes its sustainability reports on an annual basis. This report covers the period from 1 July 2024 to 30 June 2025, and is available on SGXNet and the Group's website at: <https://www.oxley.com.sg/> from 10 October 2025.

This report presents and summarises the Group's policies, practices and performance on material EESG factors that are relevant to the Group's two major operating segments, namely property development and hospitality. Since the operations at property development project sites are not directly controlled by the Group, data related to energy consumption, emissions and employment aspects at these project sites were not made available to the Group and will not be covered in the report. The environmental and social data from the operations in Cambodia and PRC are also excluded due to their smaller scale relative to other projects.

The report is in compliance with the SGX Listing Rule 711A, which requires the preparation of an annual sustainability report describing our sustainability practices with references to the primary components set out in Listing Rule 711B on a "comply or explain" basis, as well as the guidance set out in the Practice Note 7.6: Sustainability Reporting Guide ("PN 7.6") issued by the SGX. The report has been prepared with reference to the Global Reporting Initiative ("GRI") Standards issued by the Global Sustainability Standards Board in 2021. The GRI Standards were chosen because they offer a widely recognised and respected benchmark for sustainability reporting, which provides organisations with a comprehensive and structured framework to report on their practices, policies and performance related to EESG aspect. The Group also reported its climate-related disclosures based on the TCFD framework on a "mandatory" basis.

This report supplements the Group's Annual Report 2025. An overview of our reported information in compliance with the SGX Listing Rules and with reference to the GRI Standards can be found at the end of this report.

## INTERNAL REVIEW AND EXTERNAL ASSURANCE

Internal review and external assurance are essential to impart higher credibility to the sustainability reports and relevant data collection procedures. The sustainability reporting process and this report have undergone an internal review by the Group's engaged internal auditors and have been reviewed and approved by the Board. While we have not sought external assurance for this report, we will consider seeking and adopting it in the future to further enhance the credibility and transparency of our sustainability reporting.

# STAKEHOLDER ENGAGEMENT

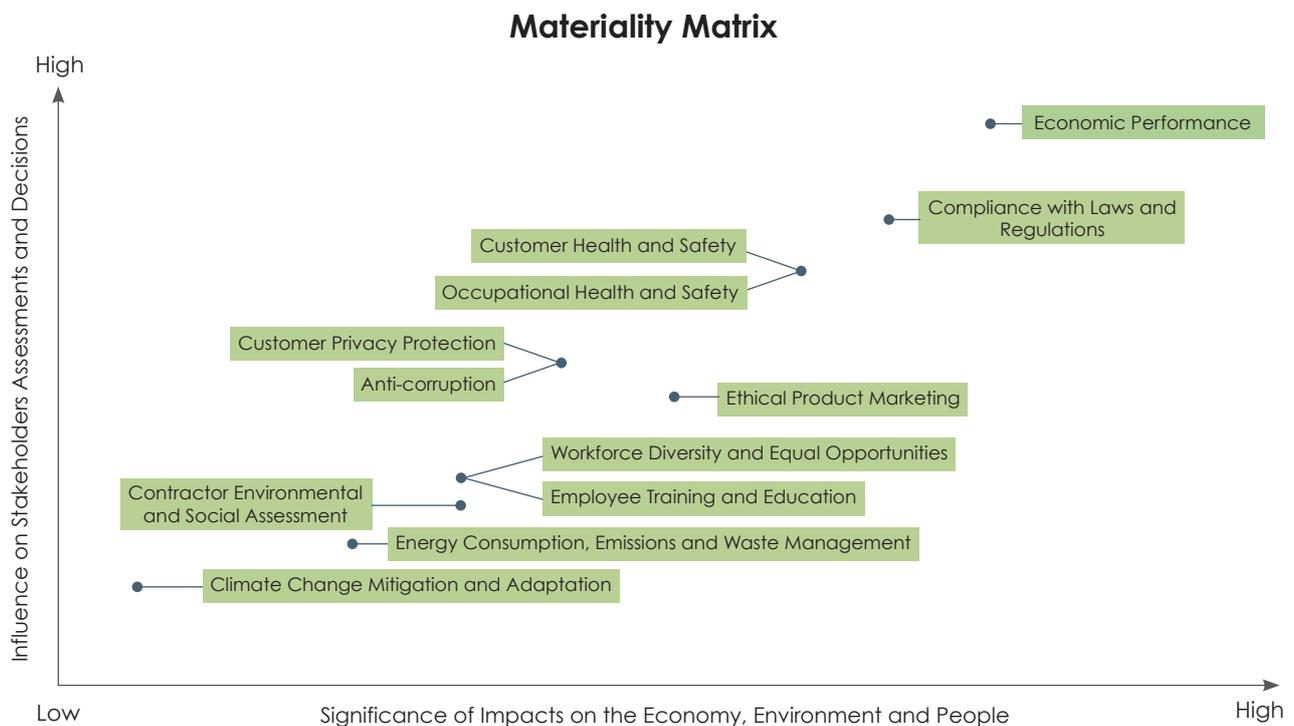
The Group recognises that stakeholder engagement is essential for sustainable growth. As such, we have implemented various channels to conduct meaningful dialogues with our stakeholders and keep them updated on material issues. Our key stakeholders are those who have a material impact on, or are materially impacted by, our operations.

The following table summarises our key stakeholders, their key concerns and the various platforms through which we engage with them:

Stakeholders	Issues of concern	Read more in the following sections	Engagement platforms	Frequency of engagement
 Property buyers	<ul style="list-style-type: none"> <li>Quality of housing</li> </ul>	<ul style="list-style-type: none"> <li>Customer Health and Safety</li> <li>Ethical Product Marketing</li> </ul>	<ul style="list-style-type: none"> <li>Annual reports</li> <li>Show flat brochures</li> </ul>	<ul style="list-style-type: none"> <li>Annual</li> <li>On a project basis</li> </ul>
 Hotel guests	<ul style="list-style-type: none"> <li>Safety and security of guests</li> <li>Data privacy</li> </ul>	<ul style="list-style-type: none"> <li>Hotel Guest Health and Safety</li> <li>Customer Privacy Protection</li> </ul>	<ul style="list-style-type: none"> <li>Online survey forms to gather feedback from hotel guests</li> <li>Online booking platforms</li> </ul>	<ul style="list-style-type: none"> <li>Regular</li> <li>Regular</li> </ul>
 Employees	<ul style="list-style-type: none"> <li>Remuneration and benefits</li> <li>Occupational health and safety</li> </ul>	<ul style="list-style-type: none"> <li>Occupational Health and Safety</li> <li>Workforce Diversity and Equal Opportunities</li> <li>Employee Training and Education</li> </ul>	<ul style="list-style-type: none"> <li>Performance appraisal</li> <li>Staff training</li> </ul>	<ul style="list-style-type: none"> <li>Annual</li> <li>Regular</li> </ul>
 Contractors and suppliers	<ul style="list-style-type: none"> <li>Health and safety</li> <li>Environmental compliance</li> </ul>	<ul style="list-style-type: none"> <li>Contractor Environmental and Social Assessment</li> <li>Occupational Health and Safety</li> </ul>	<ul style="list-style-type: none"> <li>Assessment of contractors and suppliers on occurrence of accidents</li> </ul>	<ul style="list-style-type: none"> <li>As and when required</li> </ul>
 Government and regulators	<ul style="list-style-type: none"> <li>Environmental compliance and government agencies</li> <li>Regulatory and industrial requirements required by government</li> </ul>	<ul style="list-style-type: none"> <li>Throughout all sections</li> </ul>	<ul style="list-style-type: none"> <li>SGX announcements</li> <li>Annual reports</li> <li>Emails and verbal communication</li> </ul>	<ul style="list-style-type: none"> <li>Regular</li> <li>Annual</li> <li>Regular</li> </ul>
 Community	<ul style="list-style-type: none"> <li>Environmental impact</li> <li>Social development</li> </ul>	<ul style="list-style-type: none"> <li>Climate Change Mitigation and Adaptation</li> <li>Energy Consumption, Emissions and Waste Management</li> <li>Customer Health and Safety</li> </ul>	<ul style="list-style-type: none"> <li>Community services engagement</li> </ul>	<ul style="list-style-type: none"> <li>Ad-hoc engagement</li> </ul>
 Shareholders and investors	<ul style="list-style-type: none"> <li>Economic performance</li> <li>Anti-corruption</li> </ul>	<ul style="list-style-type: none"> <li>Economic Performance</li> <li>Anti-corruption</li> </ul>	<ul style="list-style-type: none"> <li>SGX announcements</li> <li>Annual reports</li> <li>Investor relations management</li> </ul>	<ul style="list-style-type: none"> <li>Regular</li> <li>Annual</li> <li>Regular</li> </ul>

# MATERIALITY ASSESSMENT

The Group has identified a list of material topics based on its business nature and industry standards. It has compiled a survey in accordance with the identified material topics to collect opinions from relevant departments, business units and stakeholders. During FY2025, the material topics are assessed and prioritised based on their ranking in two aspects, as shown in the following materiality matrix:



Material Topics	Relevance to the Business Segments		
	Property Development	Hospitality	Head Office
<b>OVERALL</b>			
Compliance With Laws and Regulations (Including Environmental and Socioeconomic Compliance)	✓	✓	✓
<b>ETHICS AND GOVERNANCE</b>			
Anti-corruption	✓	✓	✓
<b>ECONOMIC</b>			
Economic Performance	✓	✓	✓
<b>ENVIRONMENTAL PROTECTION</b>			
Climate Change Mitigation and Adaptation	✓	✓	✓
Energy Consumption, Emissions and Waste Management	✓	✓	✓
<b>RESPONSIBLE OPERATION</b>			
Contractor Environmental and Social Assessment	✓	✓	✓
Occupational Health and Safety	✓	✓	✓
Customer Health and Safety	✓	✓	✓
Ethical Product Marketing	✓	✓	✓
Customer Privacy Protection	✓	✓	✓
<b>OUR PEOPLE, OUR ASSETS</b>			
Workforce Diversity and Equal Opportunities	N.A. <sup>1</sup>	✓	✓
Employee Training and Education	N.A. <sup>1</sup>	✓	✓

<sup>1</sup> Not applicable as the employees of property development projects are managed by the main contractors.

# SUSTAINABILITY TARGETS

The table below summarises our sustainability performance in FY2025 against the targets set in the financial year ended 30 June 2024 ("FY2024"). Unwavering in its commitment to continue its current sustainability practices, the Group will set similar targets for the financial year ending 30 June 2026 ("FY2026") and continues to monitor and improve its performance.

Material Topics <sup>2</sup>	Business Segments	Targets for FY2025	Progress	Targets for FY2026
<b>ETHICS AND GOVERNANCE</b>				
Anti-corruption	Head Office	Zero incidents of corruption.	We were notified in FY2025 of bribery offence that occurred in 2022 amounting to S\$5,000 involving a former employee who is no longer with the Group. The Group had no business dealings with the relevant party in FY2025.	✓
<b>ECONOMIC</b>				
Economic Performance	Hospitality	Launch of our Shangri-La hotel in Phnom Penh in FY2025. This will contribute to the Group's revenue.	We have marked a significant milestone with the soft opening of Shangri-La Phnom Penh, the first Shangri-La hotel in Cambodia in Q42024.	✓ New target: Improve occupancy rate at our Shangri-La hotel in Phnom Penh, which will contribute to the Group's revenue.
<b>ENVIRONMENTAL PROTECTION</b>				
Climate Change Mitigation and Adaptation  Energy Consumption, Emissions and Waste Management	Property Development	Achieve green building certification standards for all projects in FY2025. <ul style="list-style-type: none"> <li>Building and Construction Authority ("BCA") Green Mark in Singapore and Malaysia</li> <li>BREEAM "Very Good" in the UK</li> <li>LEED Gold in Ireland</li> </ul>	<ul style="list-style-type: none"> <li>Oxley Towers KLCC is undergoing verification for the BCA Green Mark. The Group has no projects under construction in Singapore.</li> <li>Achieved BREEAM "Very Good" (Year 2016) in the UK and LEED Gold (Year 2020) in Ireland.</li> </ul>	✓
	Hospitality	Reduce the intensities of energy consumption and greenhouse gas ("GHG") emissions by 5% by the financial year ending 30 June 2028 ("FY2028") compared to the financial year ended 30 June 2023 ("FY2023") baseline (which are approximately 0.229 MWh/m <sup>2</sup> and 0.004 tCO <sub>2</sub> e/m <sup>2</sup> ).	The intensity of GHG emissions has remained at a similar level compared to FY2023. However, due to an increase in occupancy and events, the intensity of energy consumption has increased in FY2025 compared to FY2023. We are still working towards achieving the target.	✓ New target: Install the solar panel system and Guest Room Management System, contingent upon the outcome of Singapore Tourism Board Grant application.
	Head Office	Establish an implementation roadmap for reporting climate-related disclosures in alignment with the ISSB Standard by FY2025.	In FY2025, we enhanced our processes and disclosures through climate scenario analysis, laying the groundwork for effective reporting and ensuring transparency in our climate-related strategies and impacts.	

# SUSTAINABILITY TARGETS

Material Topics <sup>2</sup>	Business Segments	Targets for FY2025	Progress	Targets for FY2026
Environmental Compliance	Property Development	Zero incident of major environmental non-compliance at project sites in the UK, Ireland and Malaysia in FY2025.	Achieved.	✓
	Hospitality	Zero incident of environmental non-compliance at hotels in FY2025.	Achieved.	✓
<b>RESPONSIBLE OPERATION</b>				
Contractor Environmental and Social Assessment	Head Office	Screen all appointed main suppliers to ensure full compliance with local environmental and socioeconomic laws and regulations in FY2025.	No screening was performed as the Group did not launch new projects in FY2025.	✓
Occupational Health and Safety	Property Development	Zero fatal occupational health and safety incident at project sites during construction in FY2025.	Achieved.	✓
	Hospitality	Zero fatal occupational health and safety incident at hotel in FY2025.	Achieved.	✓
Customer Health and Safety	Property Development	Zero occupant health and safety incident in FY2025.	Achieved.	✓
	Hospitality	Zero guest health and safety incident in FY2025.	We recorded 28 accidents in FY2025, primarily due to employee oversight, along with 3 incidents related to wear and tear of our equipment. However, we are actively addressing these issues by enhancing maintenance protocols to prevent future occurrences.	✓
Ethical Product Marketing	Property Development	Zero incident of non-compliance concerning market communications of properties in FY2025.	Achieved.	✓
Customer Privacy Protection	Head Office	Zero breach of Personal Data Protection Act ("PDPA") in FY2025.	Achieved.	✓
<b>OUR PEOPLE, OUR ASSETS</b>				
Workforce Diversity and Equal Opportunities	Head Office	Zero breach of labour laws in FY2025.	Achieved.	✓

<sup>2</sup> Given the limited resources available, the Group has decided to focus its efforts on areas that require more immediate improvement. Therefore, no target has been set for the material topic "Employee Training and Education" at the moment.

# ETHICS AND GOVERNANCE

Oxley recognises the importance of ethical business practices and human rights. We adhere to the highest standards of ethics and integrity and have established a code of conduct in our Employee Handbook for staff to follow.

## ANTI-CORRUPTION

The Group takes a strong stance against any form of corruption within the organisation. To promote a culture of transparency and ethical behavior within the Group, we ensure that employees are informed about our zero-tolerance policy towards corruption, as outlined in their employment agreements. The Group also upholds a strict policy of not engaging in business dealings with any parties known or reasonably suspected to be involved in corruption. In the event of corruption, we will promptly conduct independent investigations and implement measures to prevent recurrence. No significant corruption risks were reported during the year (FY2024: Nil). Throughout FY2025, there were no public legal cases (FY2024: Nil). However, we were notified in FY2025 of bribery offence that occurred in 2022 amounting to S\$5,000 involving a former employee who is no longer with the Group. The Group had no business dealings with the relevant party in FY2025. In response, we reinforced the importance of ethical conduct through an email reminder to all staff, reiterating our expectations for maintaining a culture of transparency and accountability.

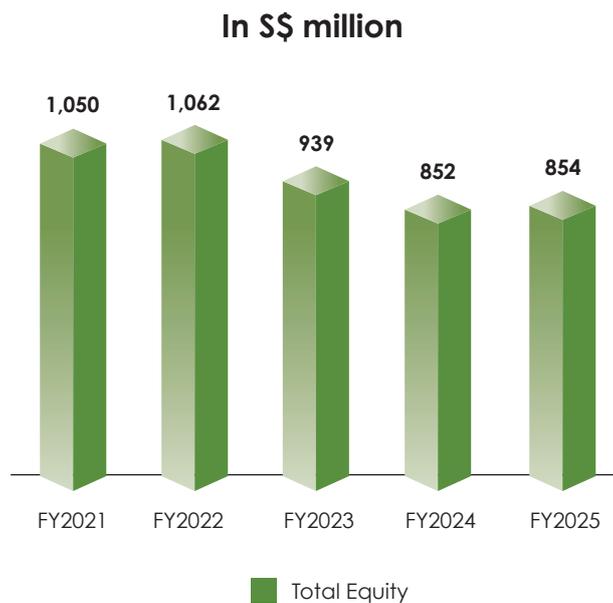
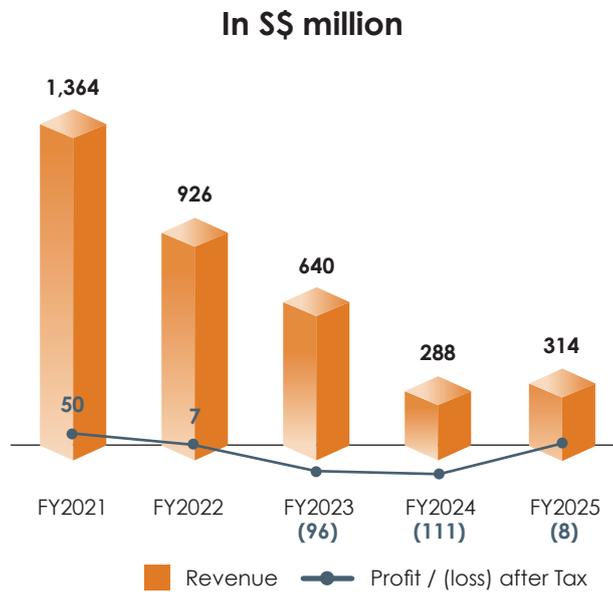
## Whistle-Blowing Policy

The Audit Committee ("AC") is responsible for reviewing the Group's whistle-blowing policy and procedures. The policy provides staff with clearly defined and accessible channels for reporting potential improprieties related to financial reporting, misconduct or wrongdoing by the Group or its employees. The policy also ensures that any such reports are independently investigated, and appropriate follow-up actions are taken. We are pleased to report that no whistleblowing reports were received in FY2025 (FY2024: Nil).



# ECONOMIC

## ECONOMIC PERFORMANCE



Oxley registered revenue of S\$314 million for FY2025 compared to S\$288 million for FY2024. The increase was mainly due to higher revenue recognised for the property development projects in Malaysia.

For a detailed breakdown of Oxley's FY2025 financial results, please refer to the financial statements in the Annual Report 2025.

# ENVIRONMENTAL PROTECTION

The Group is committed to being a responsible corporate citizen in the communities where we operate. We strive to deliver safe, environmentally sustainable and high-quality property developments that meet the needs of our stakeholders.

## ENVIRONMENTAL COMPLIANCE

During FY2025, there were no incidents of non-compliance with environmental laws and regulations at hotels and project sites in the UK, Ireland and Malaysia (FY2024: Nil). We will continue to strive for excellence and adopt innovative solutions to reduce our environmental impact and promote sustainable practices.

## CLIMATE CHANGE MITIGATION AND ADAPTATION

Climate risk considerations have emerged as a critical aspect of business continuity that needs to be addressed. With reference to the TCFD framework, we assess the impact of key climate-related risks and opportunities and disclose climate action strategy under four overarching elements, including governance, strategy, risk management and metrics and targets.

### Governance

We have established a robust governance structure to oversee our sustainability issues. Our Board has oversight of our sustainability strategy and approves our disclosures on climate-related risks and opportunities, as well as corresponding actions and targets, annually to enhance climate resilience. We have also established a Sustainability Task Force, comprising representatives from respective work teams, to facilitate the management and execution of climate-related actions.

### Strategy

We recognise that climate change brings both risks and opportunities to our business. To effectively address climate-related risks and identify opportunities, we conducted a scenario analysis to identify and evaluate the potential impacts of climate change on our business and stakeholders, considering both physical and transition risks/opportunities.

<b>Scope</b>	<ul style="list-style-type: none"> <li>Hospitality and head office operation in Singapore</li> <li>Property development operation in Malaysia</li> </ul>	
<b>Time horizon</b>	Short-term (1-3 years); Medium-term (3-10 years); Long-term (10-25 years)	
<b>Scenario explored</b>	High emissions scenario for physical risk assessment: Intergovernmental Panel on Climate Change ("IPCC") Shared Socioeconomic Pathway ("SSP") 5-8.5 Scenario	Low emissions scenario for transition risk assessment: Network for Greening the Financial System ("NGFS") Net Zero 2050 Scenario

The analysis enables us to understand the multifaceted threats posed by climate change and formulate strategies to mitigate these risks while seizing new opportunities. The table below provides an overview of climate-related risks and opportunities that are relevant to the above operations, along with the corresponding mitigation and adaptation measures taken to address them.

# ENVIRONMENTAL PROTECTION

Description of climate-related risks	Time horizons	Risk level	Risk management measures
<p><u>Physical risk – Extreme weather events - Rainstorm</u> The increasing frequency and severity of extreme rainstorms, may lead to traffic disruptions, logistics delays, damage to properties, and supply chain interruptions, resulting in higher repair and recovery costs, which in turn could negatively impact the Group's profitability.</p>	Short- to long-term	Medium	We closely monitor the latest weather news and suggestions issued by local governments and ensure that personnel are prepared to deal with such extreme weather conditions. We have also purchased insurance for our employees and assets.
<p><u>Physical risk – Rising mean temperatures/ Extreme weather events - Extreme heat</u> Rising mean temperatures and the increasing frequency and severity of extreme heat, may lead to equipment overheating, increased energy consumption, and even equipment damage, resulting in higher maintenance costs. Additionally, higher temperatures require more energy for cooling to ensure employee health and safety, and these events could negatively impact the Group's profitability.</p>	Short- to long-term	High	
<p><u>Transition risk – Disclosure and compliance risks</u> With the strengthening of global commitments to decarbonisation, there have been stricter climate legislations and regulations worldwide to support the vision of global carbon neutrality. For example, the Singapore government has been accelerating the transition to a low-carbon economy and imposing stricter climate-related disclosure and emission reduction requirements. Consequently, the Group may be exposed to transition risks and higher operating costs in the medium term to comply with regulatory changes. Failure to meet climate change compliance requirements may also expose us to claims and litigation, which could result in a possible loss of corporate reputation.</p>	Short- to medium-term	Medium	We regularly monitor existing and emerging climate-related trends to avoid reputation risk due to slow response. We pay attention to policies and regulations and obtain compliance advisory services when necessary. We are committed to maintaining high transparency in our sustainability reporting and related activities, which helps to establish trust and confidence in our relationship with investors and customers.

# ENVIRONMENTAL PROTECTION

Description of climate-related risks	Time horizons	Risk level	Risk management measures
<p><u>Transition risk – Changes in market demand</u></p> <p>With the development of a low-carbon economy, the demand for clean energy and sustainable products and services is expected to rise, while the demand for high-carbon options may decline. In the hospitality sector, the interest in sustainable travel is increasing as hotel guests become more concerned about the carbon footprint of their stays. Similarly, the property development sector is witnessing a growing trend toward green building practices, reflecting a commitment to sustainable design, energy efficiency, and the use of environmentally friendly materials in construction.</p> <p>If the Group fails to adapt its business model or develop low-carbon products and services in a timely manner, it may face significant risks from shifts in market demand, potentially losing its competitive edge.</p> <p><u>Opportunities</u></p> <p>By transitioning to a low-carbon business model and integrating more sustainable practices into our operations, we can strengthen our competitive position and seize additional business opportunities from customers who value our environmental initiatives.</p>	Short- to long-term	Medium	<p>To demonstrate our commitment to climate action, we continuously work towards improving the energy efficiency of our properties by integrating energy-efficient features in the building design. In addition, we have implemented various initiatives at our hotels to encourage guests to participate in climate mitigation during their stay. These include actively participating in events like the Earth Hour and World Water Day. For energy conservation initiatives, please refer to the section titled “Energy Consumption, Emissions and Waste Management”.</p>

## Risk Management

We understand the importance of addressing climate-related issues and staying up to date with the latest trends in climate adaptation and mitigation through stakeholder engagement. To inform its decision-making, the Group has conducted an internal climate risk assessment process to rank the risk levels of climate-related issues in terms of their likelihood and consequence. In addition, the Group has integrated climate-related issues into its enterprise risk management processes to enhance its effectiveness in climate-related risk management.

# ENVIRONMENTAL PROTECTION

## Metrics and Targets

The Group followed the best practice of prioritising the use of active emissions reduction measures and continued to monitor its performance on GHG emissions. We have also committed to emissions reduction targets to align with the global vision of decarbonisation. Relevant metrics, targets and measures to monitor the Group's energy consumption and emissions can be found in the sections headed "Sustainability Targets" and "Energy Consumption, Emissions and Waste Management". The Group is currently strengthening its data collection mechanism and will continue to expand its reporting scope to include Scope 3 - Other Indirect GHG Emissions in the future.

## ENERGY CONSUMPTION, EMISSIONS AND WASTE MANAGEMENT

### Sustainable Property Development

We are committed to designing green and sustainable buildings. The Group strives to achieve green building certifications for all its buildings such as the BCA Green Mark, BREEAM and LEED certifications, which are internationally recognised standards for sustainable building design and operations. This would be a testament to our commitment to maintaining the environmental friendliness and sustainability of our buildings from design to construction and operations.

We continuously work towards improving the energy and water efficiency of our properties. In addition to implementing energy-efficient features such as LED lights or photovoltaics in the common areas of our properties, we also adopt energy-efficient air-conditioning systems and motion-sensor lighting where possible to optimise energy consumption.

Our properties are designed with water-efficient features that adhere to local regulations and requirements. We are committed to working closely with contractors and subcontractors to manage our energy efficiency and carbon footprint.

### Energy Consumption and Emissions Management at Hotels

The hospitality industry is increasingly adopting environmental management systems ("EMS") in line with frameworks such as ISO 14001, ISO 50001 and the United Nations Sustainable Development Goals ("SDG"), particularly SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action).

Our hotels stand out in this competitive landscape. As part of our commitment to environmental sustainability, our hotels have implemented a comprehensive EMS to effectively manage air quality, water, energy, and waste. Furthermore, we have received the BCA Green Mark Infrastructure: Gold Plus certification, a mark of excellence in Singapore's built environment. According to BCA, certified buildings typically experience energy savings of 20-30%.



BCA Green Mark Certificate

# ENVIRONMENTAL PROTECTION

To further demonstrate our commitment to sustainable management, social and economic responsibility, cultural heritage preservation, and environmental stewardship, our hotel operations have successfully achieved Green Globe Standard 1.7 certification under the Hotel & Resort category in FY2025. This certification is a testament to our efforts and achievements in sustainable operations and management within the travel and tourism industry. We remain dedicated to enhancing our sustainability practices to ensure our business activities positively impact both the environment and society.

Our hotels have also adopted an Environmental Policy to promote sustainable practices among our staff and guests. This policy emphasises reducing resource consumption, minimising waste, and supporting sustainable procurement practices. By engaging our employees in sustainability initiatives and encouraging guests to participate in eco-friendly practices, we aim to create a positive impact on the environment while enhancing the overall guest experience.

## Enhancing Energy Efficiency

Our primary sources of energy consumption are commercial liquefied petroleum gas ("LPG") for kitchen use and purchased electricity for daily operations. To reduce LPG consumption, we have implemented menu planning measures that focus on offering portion-controlled options and estimating guest demand. This ensures we prepare only the necessary amounts of food, minimising cooking time and energy use.

To minimise electricity consumption, we have adopted the following measures outlined in our Environmental Policy:

- Turn off all lights when we vacate our offices and meeting rooms;
- Avoid the use of individual desk lamps;
- Avoid turning on the lights for offices and meeting rooms with natural daylight during the daytime;
- Put computers in sleep mode when leaving our desks;
- Turn off computers when leaving for the day;
- Unplug or turn off the main switches for computers and phones when the batteries are fully charged;
- Ensure the HVAC system is cleaned and maintained regularly for maximum efficiency; and
- Replaced 80% of our lighting with LED bulbs, which can reduce energy consumption by 75% and lasts 25 times longer than traditional incandescent bulbs, as highlighted by the International Energy Agency ("IEA").

We actively support guest-driven sustainability initiatives by placing reminders in guest rooms, encouraging guests to turn off lights, TVs, and air conditioners when not in use. Furthermore, our "Clean for Green" programme informs guests about our alternate-day towel and linen change policy. A 2024 Sustainable Travel Report from Booking.com reveals that 75% of global travellers express a desire to travel more sustainably in the next 12 months.



Green Globe Certification



Notice of "Clean for Green" Programme for the Guest Room

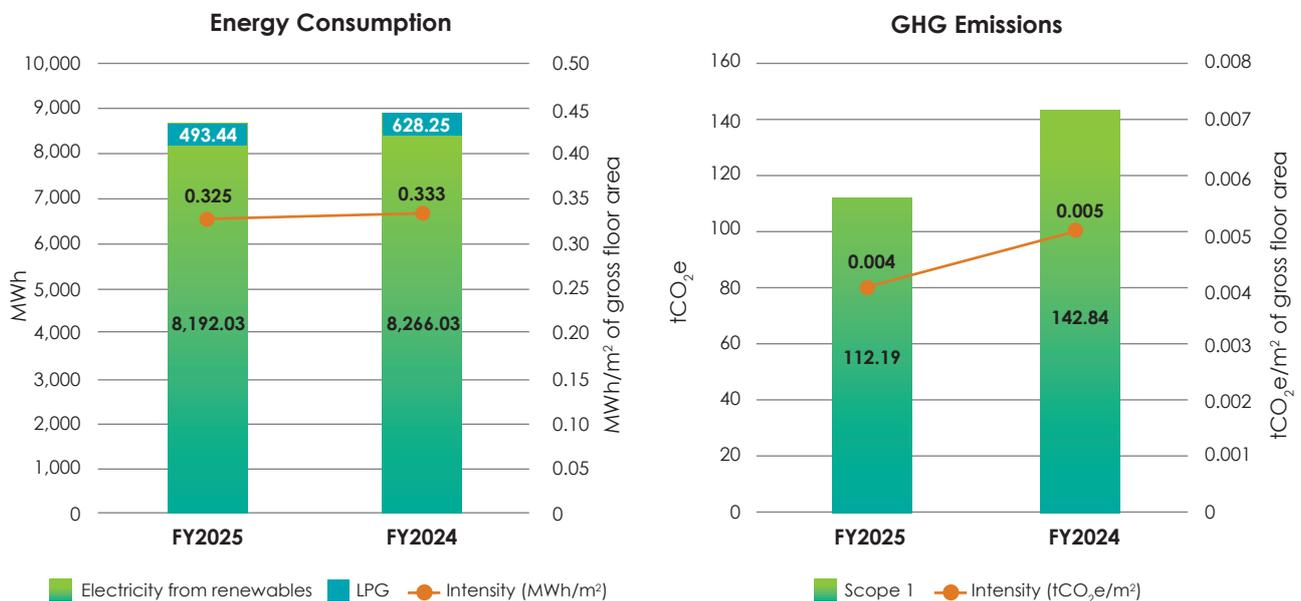
# ENVIRONMENTAL PROTECTION

## Use of Renewables

Additionally, our partnership with Flo Energy, which supplies 100% renewable energy, aligns with the growing trend in the hospitality industry towards renewable energy adoption. By securing Renewable Energy Certificates, we actively offset our Scope 2 GHG emissions, contributing to the industry-wide movement toward decarbonisation.

## Energy Consumption and Emissions Reduction Trend

The graphs below illustrate the amount and intensity<sup>1</sup> of energy consumption and GHG emissions<sup>2</sup> of the Group's hotels:



In FY2025, the intensities of our energy consumption and GHG emissions decreased by approximately 2% and 20%, respectively. This reduction was primarily due to decreased consumption of LPG, resulting from reduced operating hours in kitchens, menu simplification, and a shift in cooking techniques. Moving forward, we plan to invest in smart energy management systems to further reduce hotel energy consumption.

<sup>1</sup> As at the end of both FY2025 and FY2024, the total gross floor area of the hotels was approximately 26,703.82 m<sup>2</sup>. The data are used for calculating the intensities of energy consumption and GHG emissions.

<sup>2</sup> The unit conversion method of energy consumption data is formulated based on the "Energy Statistics Manual" issued by IEA. GHG emissions data are calculated based on, including but not limited to, "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" issued by the World Resources Institute and the World Business Council for Sustainable Development, "Appendix to Part II: Monitoring Plan of Greenhouse Gas (GHG) Emissions Measurement and Reporting Guidelines" published by Singapore's National Environment Agency ("NEA").

# ENVIRONMENTAL PROTECTION

## Waste Reduction at Hotels

Our waste management practices aim to achieve global zero-waste goals, specifically targeting food, plastics, and used amenities. We focus on minimising waste generation through source reduction, reuse, and recycling, adhering to the principles of “Reduce, Reuse, Recycle, and Replace”. To support these efforts, our Waste Disposal Management Policy outlines standardised procedures for the safe and efficient disposal of waste generated in hotels. This includes ensuring the safe handling of all waste types and promoting employee awareness and training on proper disposal practices, while complying with NEA regulations and international best practices, as well as the commitments of our hotel operator, Accor.

### Food Waste Reduction

In line with our commitment to reducing food waste, our Food Waste Management Policy establishes comprehensive procedures for reducing, segregating, handling, and disposing of food waste across all food preparation and service areas. To minimise waste, we focus on menu planning and guest engagement by offering portion-controlled options and using predictive tools to estimate guest demand. We also prioritise “first-in, first-out” inventory rotation and encourage the use of trimmings in food preparation.

In addition, we have implemented a smart food waste tracker provided by Lumitics. This technology is widely adopted across the hotel industry and has been shown to reduce food waste by up to 30%. The tracker measures, monitors and identifies all food waste generated in the kitchen, providing us with real-time data on our waste generation and helping us to identify areas where we can improve our food preparation and storage practices or adjust our menus to reduce waste. Key insights are shared with relevant staff during briefings, meetings, and training sessions to enhance our overall waste management efforts.

### Plastic Waste Reduction

Since 2019, our hotels have joined the World Wildlife Fund Singapore's the Plastic ACTION (PACT) initiative, which seeks to eliminate plastic pollution and promote a circular economy for plastics by 2030. Since FY2024, we have achieved 100% elimination of single-use plastics in guest-facing areas. We have transitioned our guest room bathroom amenities to natural kraft packaging and replaced traditional disposable shampoo and body soap bottles with refillable pump bottles. Furthermore, we have installed water filtration systems in guest rooms to replace single-use plastic bottles.



*Elimination of Single-use Plastics*

# ENVIRONMENTAL PROTECTION

## Waste Reduction Trend

In FY2025, our initiatives have led to a significant reduction in general waste. To ensure responsible management of waste, all types of waste are collected and processed by licensed collectors. Except for general waste, other types of waste are diverted from disposal to recycling, contributing to a circular economy. The breakdown of the waste generated is as follows:

Types of waste	FY2025 Amount generated (kg)	FY2024 Amount generated (kg)
General waste	475,790	487,610
Paper	15,559	10,526
Metal	645	618
Plastic	203	223
Glass	596	254
E-waste	812	201
Bulky items	4,890	1,320
<b>Total</b>	<b>498,495</b>	<b>500,752</b>

On 26 and 27 October 2024, Novotel partnered with City Sprouts to host the “Eco Oasis@Stevens: Community Farm & Marketplace” in our lush herb gardens at La Terrasse and L’Apéritif, in celebration of World Sustainability Day. This vibrant sustainable farmers’ market featured a diverse selection of seasonal fruits, vegetables, herbs, and artisanal goods, all sourced from local farmers and producers dedicated to sustainable practices. The event also included workshops where participants transformed recycled materials from hotel rooms into functional items and art pieces. By supporting local economies, fostering community engagement, and promoting innovative solutions for sustainable living, we aimed to create a platform for education and collaboration, encouraging guests and the community to make environmentally conscious choices in their everyday lives.



“Eco Oasis@Stevens” Event

# ENVIRONMENTAL PROTECTION

Novotel has also formed an exclusive partnership with Planet Earth Singapore, a visionary company that transforms scrap metal and other recyclable materials into stunning works of art. By leveraging this collaboration, we not only contribute to sustainability but also enhance the guest experience with a focus on environmental consciousness.



*Planet Earth Art Gallery*

On 21 May 2025, we organised a visit to the Tuas South Incineration Plant to raise employee awareness about waste management and environmental sustainability. Employees learned about the waste-to-energy process, observed the facility's advanced technology, and understood the importance of responsible waste disposal. This initiative underscores our commitment to sustainability and encourages employees to adopt environmentally responsible practices both at work and in their personal lives.

On 10 June 2025, our hotels hosted a workshop in celebration of World Oceans Day, engaging employees in interactive discussions and competitions focused on marine ecosystems, pollution, and actionable solutions for ocean health. The event effectively raised awareness about ocean conservation and promoted sustainable practices among our staff, reinforcing our hotel's commitment to environmental stewardship and responsible tourism.

# ENVIRONMENTAL PROTECTION

## **Sustainable Sourcing at Hotels**

Sustainable sourcing is a core aspect of our operations, reflecting the hospitality industry's growing commitment to responsible practices. As customer preferences shift towards transparent and ethical supply chains, we prioritise partnerships with suppliers who hold reputable environmental certifications, such as ISO 14001, Fair Trade and Rainforest Alliance. Additionally, all suppliers must sign Accor's Responsible Procurement Charter, affirming their dedication to sustainability.

To support local communities and minimise transportation-related emissions, we strive to source products and suppliers locally whenever possible. This approach not only reduces our carbon footprint but also enriches guest experiences by showcasing local culture through artisans and regional food products.

Furthermore, we actively seek suppliers who offer bulk shipments with minimal or zero packaging options or agree to our "take-back" requests for their packaging. In our selection of furniture and décor, we favour items made from recycled or reclaimed materials, prioritising durability and the potential for repair or refurbishment over frequent replacement.

In our food sourcing practices, we have implemented a ban on overfished species and emphasise certified sustainable options, including fair-trade and organic products. Whenever possible, we choose organic produce and focus on seasonal items to further reduce the carbon footprint associated with out-of-season imports. Additionally, we conduct thorough screenings of new food suppliers to ensure compliance with Hazard Analysis Critical Control Point ("HACCP") standards.

# RESPONSIBLE OPERATION

The Group places a high value on responsible operating practices and prioritises the well-being of all stakeholders, including its contractors, partners, staff, customers and hotel guests. Our primary objective is to ensure strict compliance with local laws and regulations, including maintaining safety standards at project sites during the construction phase and delivering safe and high-quality buildings to our customers. We also place a strong emphasis on workplace health and safety for our employees, as well as implementing sound food and physical safety practices to ensure the health and safety of our customers, both occupants and guests.

## CONTRACTOR ENVIRONMENTAL AND SOCIAL ASSESSMENT

We place a strong emphasis on maintaining rigorous evaluation and review procedures throughout both supplier tendering and monitoring processes. During FY2025, none of our contractors or suppliers have been identified as having significant actual or potential negative environmental or social impacts (FY2024: Nil), demonstrating our commitment to sustainability and responsible business practices.

### Construction Contractor Management

For the property development segment, we assess or review all main contractors and subcontractors based on a variety of factors, including product quality, delivery timeliness, compliance and environmental and social criteria. We use recognised benchmarks such as the BCA Green and Gracious Builder and Construction Quality Assessment System ("CONQUAS") scores in Singapore to ensure our standards are aligned with industry best practices and in compliance with laws and regulations. In addition, we pay close attention to their track records and worksite health and safety practices, and take swift action to remove any contractors who fail to meet our standards from our approved list.

## OCCUPATIONAL HEALTH AND SAFETY

### Construction Safety Management

The Group ensures all contractors and subcontractors are notified of their worksite health and safety responsibilities during the vendor selection process, and are able to meet the standards that qualify for ISO certifications. We also appoint Design for Safety ("DfS") professionals to identify, design and implement measures to eliminate and mitigate foreseeable risks to health and safety during and beyond the construction stage, i.e., subsequent use and maintenance of the buildings.

We will continue to monitor the occupational health and safety performance of our main contractors and reinforce safety standards. In FY2025, there were no major breaches of occupational health and safety regulations at our project sites (FY2024: Nil), and we had no cases of work-related fatalities or injuries among our contractors (FY2024: Nil).

# RESPONSIBLE OPERATION

## Workplace Health and Safety at Hotels

The Group places a strong emphasis on occupational health and safety for both its employees and contractors. To this end, the hotels have established a Health and Safety Policy in accordance with relevant local laws and regulations, aiming for zero workplace accidents through comprehensive hazard identification and elimination, including anti-terrorism measures. The policy and relevant guidelines are regularly reviewed to ensure that they are up-to-date and effective in their aim of providing a secure working environment for all employees. In addition to our policy, we provide health-related benefits such as medical insurance for our employees. First-aid boxes are available and regularly replenished with over-the-counter medication.

During the hotel operator selection process, we assessed their safety practices and procedures for maintaining employee health and safety. We periodically review safety risks and implement safety measures to mitigate them. Employees are encouraged to report any work-related hazards through various channels, including verbal reports, phone calls or emails, and their reports are followed up immediately by the appropriate individuals. To drive continuous improvement and ensure the effectiveness of our safety measures, we involve staff in risk assessments and encourage them to provide comments or suggestions regarding our policies, procedures, and any health and safety issues.

To familiarise employees with our safety policies, principles and measures, the hotel operator is responsible for providing regular health and safety training covering topics such as hygiene, prevention measures implemented in hotels, first-aid knowledge and working from heights, among others. Through these dedicated efforts, we proudly received the “bizSAFE” Level 4 certification from the Workplace Safety and Health Council in FY2025, recognising our unwavering commitment to fostering a safe and secure workplace environment.

In FY2025, there were no major breaches of occupational health and safety regulations at our hotels and headquarters (FY2024: Nil), and no work-related fatalities were recorded (FY2024: Nil). No work-related injuries occurred at the headquarters (FY2024: Nil). However, there were 25 minor recordable work-related injuries that occurred at our hotels, resulting in an injury rate<sup>3</sup> of approximately 10.62 for hotel operations (FY2024: 40 minor recordable work-related injuries with an injury rate of approximately 18.29). We will continue to remind employees to take safety precautions by placing warning signs and labels in workplaces where occupational hazards are likely to occur. If any safety lapses are identified at our hotels or project sites, immediate follow-up actions will be taken to rectify the safety-related non-compliances.



*bizSAFE Certificate*

<sup>3</sup> The rate is calculated based on 200,000 hours worked. The number of hours worked per year for the hotel operations was approximately 470,730 hours (FY2024: approximately 437,367 hours).

# RESPONSIBLE OPERATION

## CUSTOMER HEALTH AND SAFETY

There were no incidents of non-compliance with laws and regulations concerning the health and safety impacts of products and service in our operations (FY2024: Nil).

### Occupant Safety

The Group ensures that its property development projects comply with local design and construction requirements and guidelines. We adhere to the BCA Code on Accessibility in the Built Environment and have implemented barrier-free access in our properties to make them accessible and user-friendly for persons with disabilities and families with young children.

To ensure fire safety, we have also implemented Home Fire Alarm Devices ("HFADs") that sound an early warning to alert occupants of potential fires. Additionally, we comply with CONQUAS, an assessment system developed by BCA, for the construction of our properties. This assessment system evaluates the quality of building projects and considers aspects such as safety, comfort and aesthetic defects.

### Hotel Guest Health and Safety

Our hotel operator, Accor, is a renowned international hotel management group that places a strong emphasis on ensuring the safety and security of its guests. The hotel management team regularly reviews safety measures and implements proper protocols, such as fire safety measures and routine fire drills, to guarantee the safety of guests. Security cameras have also been installed on the hotel premises, and only hotel guests can access their rooms with their room cards.

Both Novotel and Mercure have received the HACCP Food Safety System Certificate of Verification following a comprehensive third-party review and accreditation by professional auditors. This certification underscores our commitment to maintaining high cleanliness and hygiene standards. Additionally, we are proud to have been awarded the Outstanding Cluster Award 2024 from the National Safety and Security Watch Group ("SSWG"). This recognition reflects our exceptional efforts in ensuring on-premises safety and security, significantly contributing to the overall safety of Singapore. These accolades highlight our dedication to prioritising guests' health and safety, demonstrating that we consistently meet stringent standards.



HACCP Food Safety System Certificate of Verification

# RESPONSIBLE OPERATION

## ETHICAL PRODUCT MARKETING

We strictly comply with relevant guidelines that require show units to be depicted accurately. We also obtain necessary approval for our building plans prior to opening our show flats for viewing. The guidelines serve as a crucial means of ensuring that there is no misrepresentation in our marketing efforts and that prospective buyers can have confidence that the show units they view are an accurate representation of the units for sale. By adhering to these guidelines, we are able to provide an added layer of assurance to our customers.

In FY2025, there were no incidents of non-compliance with regards to product and service information, labelling and marketing communication across our property development projects (FY2024: Nil).

## CUSTOMER PRIVACY PROTECTION

Safeguarding the personal data of our customers is of paramount importance. We are committed to maintaining the highest standards of data privacy and protection while strictly complying with relevant local laws and regulations, such as the PDPA. To achieve this, we have developed a Data Protection Policy Manual that outlines strict data classification and handling procedures, ensuring the highest level of security for customer information. We ensure that data collection is based on consent, kept to a minimum, and processed securely, with retention limited to what is necessary. All staff are required to report any suspected breaches immediately for further investigation and containment actions. Failure to comply with the policy may result in disciplinary action, including warnings, suspension, dismissal, and/or legal liability under the PDPA. During FY2025, there were no reported breaches of customer privacy by regulatory bodies or outside parties, nor were any leaks, thefts, or losses of customer data identified in our operations (FY2024: Nil).

# OUR PEOPLE, OUR ASSETS

The Group is dedicated to creating an inclusive workplace environment that values mutual respect, fairness and equality for all employees. We also prioritise providing opportunities for continuous learning and skills improvement. To achieve the vision of people-oriented management and to unlock the full potential of its employees, the Group has developed a comprehensive set of human resources management procedures. These procedures are outlined in our Employee Handbook and cover various aspects of employment, such as recruitment, dismissal, remuneration, benefits and training.

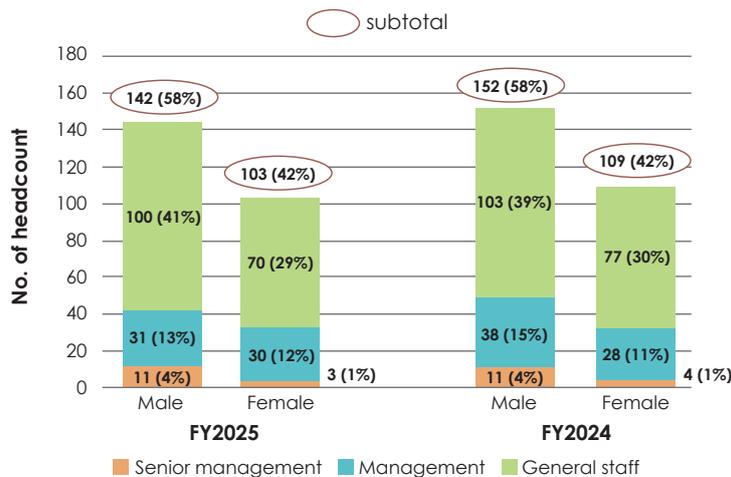
## WORKFORCE DIVERSITY AND EQUAL OPPORTUNITIES

### Workforce Diversity

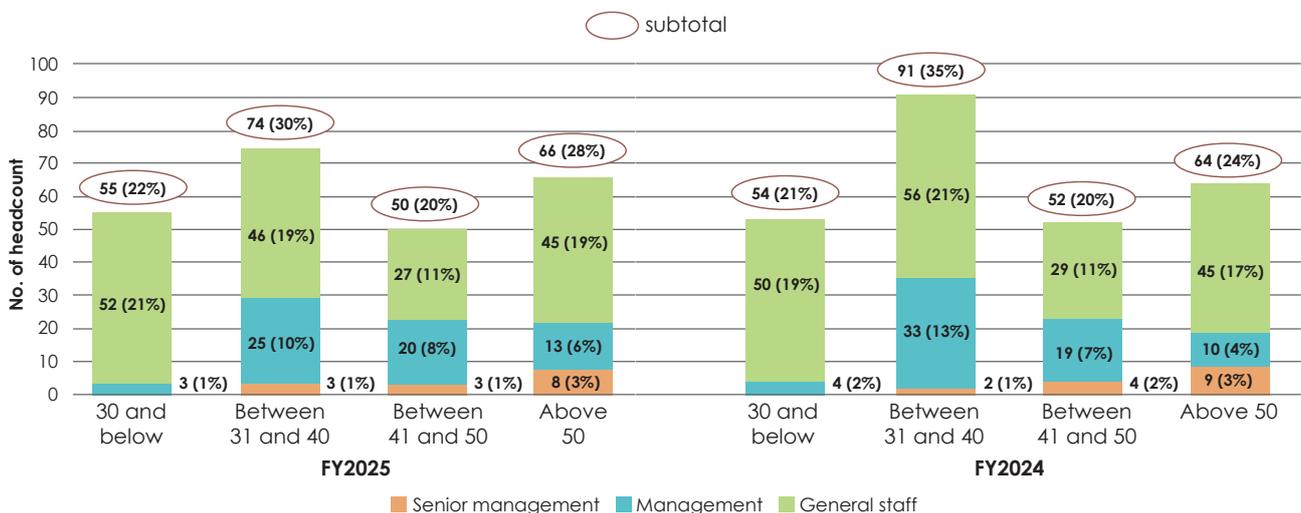
We are committed to fair employment practices and strive to achieve a balanced and diversified workforce, which includes hiring employees above the Singapore-mandated retirement age of 63 years old. To respect human rights and ensure compliance with employment-related laws and regulations, the Group prohibits any form of child labour and forced labour in its recruitment process. In FY2025, none of our operations were deemed to have significant risk for incidents of child labour, forced labour or compulsory labour (FY2024: Nil).

As at 30 June 2025, there were 245 (as at 30 June 2024: 261) permanent full-time employees in Singapore.

**Workforce by Employee Category and Gender**



**Workforce by Employee Category and Age Group**



# OUR PEOPLE, OUR ASSETS

## Employee Remuneration and Benefits

We recognise the valuable contribution of all employees. We strongly believe in fair remuneration. All employees are assessed regularly and remunerated fairly based on their experience, qualifications and performance. We prioritise the welfare of all our employees by offering a range of employee benefits such as medical insurance, healthcare and parental leave. Details on the parental leave given to employees are set out in the table below.

Indicators	FY2025			FY2024		
	Male	Female	Total	Male	Female	Total
Employees that took parental leave	14	7	21	11	10	21
Employees that returned to work in FY2025 after parental leave ended	14	7	21	11	10	21
Return to work rate	100%	100%	100%	100%	100%	100%
Employees that returned to work after parental leave ended that were still employed 12 months after their return to work	8	5	13	8	8	16
Retention rate	73%	50%	62%	100%	89%	94%

## Equal Opportunity

The Group is committed to creating and maintaining an inclusive and collaborative workplace culture in which all can thrive. The Group is dedicated to maintaining workplaces that are free from discrimination, physical or verbal harassment against any individual on the basis of race, religion, colour, gender, physical or mental disability, age, place of origin, marital status and sexual orientation. During FY2025, there were no incidents of discrimination reported (FY2024: Nil). Our hotels were awarded the SG Enable Mark (Gold) for our efforts in being an inclusive organisation that champions disability-inclusive hiring.

On 8 March 2025, we joined the global community in celebrating International Women's Day, honouring the achievements of women and advocating for gender equality. In recognition of this special day, we are delivering thoughtful gifts to our female staff and guests, expressing our appreciation for their contributions. We are dedicated to continuing our efforts to foster an inclusive environment that nurtures women's professional growth and leadership opportunities.



SG Enable Mark (Gold) Award



Celebration of International Women's Day

# OUR PEOPLE, OUR ASSETS

## EMPLOYEE TRAINING AND EDUCATION

The Group acknowledges the significance of staff training and development in ensuring the seamless operation of daily activities and fostering sustained business growth. We are committed to retaining our workforce by investing in the professional growth of our employees, enabling them to enhance their skill sets, stay updated with industry advancements, and boost their job satisfaction. To obtain funding for employee training and upskilling, our hotels leverage diverse government schemes and grants. We offer a range of training programmes, including internal and external courses, as well as on-the-job training.

To cultivate a culture of corporate social responsibility throughout the organisation, all Directors have participated in a one-time training session on sustainability, further enhancing their understanding and leadership abilities in managing sustainability-related matters.

During FY2025, all employees have received a regular performance and career development review. A total of 5,285 hours of training was also undertaken by the Group's employees in FY2025 (FY2024: 5,032 hours).

The Group will continue to prioritise employee development and invest in training and up-skilling opportunities to ensure that our team is equipped to tackle any challenges that may arise in the future.

## GIVING BACK TO COMMUNITY

On 4 November 2024, we partnered with the Central Singapore Community Development Council to host the "Annual Solidarity Day" event, providing delicious lunch for 320 elderly members of the local community and welcoming them to the hotel for a day of music, activities, and social connection. This event was part of the hotel's ongoing commitment to supporting the well-being and quality of life for seniors, addressing issues of social isolation. The positive impact of the event was evident in the joy and sense of community it fostered among the attendees.

During the Food Donation Drive from March to April 2025, we successfully collected 701 essential food items, valued at \$2,025.64, for donation to Food from the Heart. Our goal is to help alleviate food insecurity and provide nourishment to those in need within our community, while also fostering a sense of unity and compassion among our employees.



*Food Donation Drive*

# OUR PEOPLE, OUR ASSETS

On 19 May 2025, we organised a Blood Donor Talk with the Singapore Red Cross to educate our employees and guests about the critical role that each donor plays in saving lives. Following this, we encouraged participation in the Blood Donation Drive on 13 June 2025, at the Health Sciences Authority in Outram Park, providing a convenient opportunity for our employees and guests to donate blood, contributing to the vital supply needed for medical treatments. Together, we can make a significant difference in the lives of those in need. Through blood donation efforts, we are dedicated to supporting community health and well-being.

In FY2025, we are proud to partner with Nanyang Polytechnic and the Institute of Technical Education to offer internship opportunities that support skills development in the hospitality industry. This collaboration allows us to provide students with hands-on experience in a hotel environment, fostering practical skills and industry knowledge. By working together, we aim to bridge the gap between education and the workforce, empowering the next generation of hospitality professionals with valuable insights and real-world applications.

# SGX PRIMARY COMPONENTS INDEX

Primary Components	Sections/Explanation
(a) Material environmental, social and governance factors	Materiality Assessment
(aa) Climate-related disclosures consistent with the recommendations of the Task Force on Climate-related Financial Disclosures	Environmental Protection
(b) Policies, practices and performance	Throughout all sections in the report.
(c) Targets	Sustainability Targets
(d) Sustainability reporting framework	Reporting Practice
(e) Board statement and associated governance structure for sustainability practices	Chairman's Message; Sustainability Governance Structure

# GRI STANDARDS CONTENT INDEX

<b>Statement of Use</b>	Oxley Holdings Limited has reported with reference to the GRI Standards for the period 1 July 2024 to 30 June 2025.
<b>GRI 1 Used</b>	GRI 1: Foundation 2021

GRI Standards	Disclosures	Sections/Explanation
<b>General Disclosures</b>		
GRI 2: General Disclosures 2021	2-1 Organisational details	Corporate Profile; Annual Report 2025
	2-2 Entities included in the organisation's sustainability reporting	Reporting Practice
	2-3 Reporting period, frequency and contact point	Reporting Practice
	2-4 Restatements of information	No restatement was made in FY2025.
	2-5 External assurance	Reporting Practice
	2-6 Activities, value chain and other business relationships	Corporate Profile; Annual Report 2025
	2-7 Employees	Workforce Diversity and Equal Opportunities
	2-9 Governance structure and composition	Sustainability Governance Structure; Annual Report 2025
	2-11 Chair of the highest governance body	Chairman's Message; Annual Report 2025
	2-12 Role of the highest governance body in overseeing the management of impacts	Sustainability Governance Structure
	2-13 Delegation of responsibility for managing impacts	Sustainability Governance Structure
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Governance Structure; Annual Report 2025
	2-17 Collective knowledge of the highest governance body	Employee Training and Education
	2-22 Statement on sustainable development strategy	Chairman's Message
	2-23 Policy commitments	Anti-corruption; Contractor Environmental and Social Assessment; Workforce Diversity and Equal Opportunities
2-27 Compliance with laws and regulations	Throughout all sections in the report.	
2-29 Approach to stakeholder engagements	Stakeholder Engagement	

# GRI STANDARDS CONTENT INDEX

GRI Standards	Disclosures	Sections/Explanation
<b>Material Topics</b>		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Materiality Assessment
	3-2 List of material topics	
	3-3 Management of material topics	
<b>Ethics and Governance</b>		
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Anti-corruption
	205-3 Confirmed incidents of corruption and actions taken	
<b>Economic</b>		
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Economic Performance; Annual Report 2025
<b>Environmental Protection</b>		
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	Climate Change Mitigation and Adaptation
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	Energy Consumption, Emissions and Waste Management
	302-3 Energy intensity	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	
	305-2 Energy indirect (Scope 2) GHG emissions	
	305-3 GHG emissions intensity	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	
	306-2 Management of significant waste-related impacts	
	306-3 Waste generated	
	306-4 Waste diverted from disposal	
	306-5 Waste directed to disposal	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Contractor Environmental and Social Assessment
	308-2 Negative environmental impacts in the supply chain and actions taken	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	
	414-2 Negative social impacts in the supply chain and actions taken	
<b>Responsible Operation</b>		
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Occupational Health and Safety
	403-2 Hazard identification, risk assessment, and incident investigation	
	403-3 Occupational health services	
	403-4 Worker participation, consultation, and communication on occupational health and safety	
	403-5 Worker training on occupational health and safety	
	403-6 Promotion of worker health	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	
	403-8 Workers covered by an occupational health and safety management system	
	403-9 Work-related injuries	

# GRI STANDARDS CONTENT INDEX

GRI Standards	Disclosures	Sections/Explanation
GRI 416: Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Customer Health and Safety
GRI 417: Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling	Ethical Product Marketing
	417-2 Incidents of non-compliance concerning product and service information and labelling	
	417-3 Incidents of non-compliance concerning marketing communications	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Customer Privacy Protection
<b>Our People, Our Assets</b>		
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Workforce Diversity and Equal Opportunities
	401-3 Parental leave	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labour	
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	
GRI 404: Training and Education 2016	404-2 Programmes for upgrading employee skills and transition assistance programmes	





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