

Annex A: Supplier Ethics Policy



ComfortDelGro Corporation Limited and its subsidiaries worldwide (hereinafter collectively referred to as “ComfortDelGro”) procure a wide range of goods or services from various businesses, companies, corporations, persons and entities, including their employees, agents and representatives (hereinafter collectively referred to as “Suppliers”), in the course of its business operations.

As such, ComfortDelGro requires its Suppliers to operate in accordance with the principles in this Supplier Ethics Policy (“Policy”) and in full compliance with all applicable laws and regulations.

Suppliers are required to adhere to all local laws (including antitrust, anti-competition, anti-corruption and anti-fraud policies), maintain high ethical standards, have clear health & safety policies, strict environmental policies, and adopt fair employment practices.

It is the responsibility of Suppliers to ensure their employees and representatives understand, comply and act consistently with this Policy. Failure to adhere to this Policy may result in disqualification from consideration for business, and/or future business, with ComfortDelGro.

1. Compliance with Laws and Regulations

1.1. Abidance with the Law

Suppliers’ business operations, as well as all goods and services supplied to ComfortDelGro, must fully comply with the laws and regulations of the countries where Suppliers’ operations are based as well as where goods and services are provided to ComfortDelGro.

1.2. Use of Fair Business Practices

Suppliers must practise fair competition in accordance with local antitrust and competition laws. Activities that restrict competition must be avoided. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independent of understandings or agreements with competitors.

2. Ethics and Conflict of Interest

2.1. Anti-Corruption Stance

Suppliers must conduct their business with integrity, transparency and honesty. ComfortDelGro does not condone any corrupt practices such as bribery, extortion or embezzlement in all business interactions. Suppliers are prohibited from offering, paying, soliciting or receiving (whether directly or otherwise) any form of bribe as inducement or reward for any business transaction with or involving ComfortDelGro. The term “bribe” broadly includes any illicit advantage such as (but is not limited to) cash, cash equivalents, property, loans, commissions, services, benefits in kind or other advantages.

2.2. Anti-Fraud Stance

In the same vein, ComfortDelGro does not condone any fraudulent practices such as intentional deception, misappropriation of resources or manipulation of data. Suppliers are prohibited from altering or falsifying records, failing to account for monies received or knowingly providing false information for any business transaction with or involving ComfortDelGro.

2.3. Gifts and Entertainment

ComfortDelGro is committed to conducting all business without undue influence. The Policy requires it to exercise good judgment and practise moderation in receiving business gifts and entertainment.

Suppliers must not offer or give gifts or hospitality (including kickbacks, favours, cash, gratuity, entertainment or anything of value) to any ComfortDelGro employee that is intended as, or may be viewed as an attempt to improperly influence business decisions. In addition, ComfortDelGro employees are prohibited from accepting initial public offering (IPO) stock from any Supplier.

Employees will respectfully decline entertainment, gifts or other benefits that could in any way be construed as, or give the appearance of, attempting to influence business decisions in favour of any person or organisation with whom ComfortDelGro may have business dealings.

2.4. Conflicts of Interest

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

3. Workplace Health, Safety and Quality

3.1. Healthy and Safe Working Environment

Suppliers must have in place health & safety protection policies and management systems to provide a secure working environment. They must be designed to promote the general health of employees and reduce work-related injury and illness. For example, protective equipment and tools must be provided and replaced/maintained regularly.

3.2. Safety

The safety of all goods and services supplied must be ensured through appropriate policies, implementation and monitoring.

3.3. Quality

Suppliers' policies and management systems must be developed to ensure that the quality of all goods and services are as specified in their contracts with ComfortDelGro.

4. Corporate Social and Environmental Responsibility

4.1. Corporate Social Responsibility

ComfortDelGro is committed to building positive relationships with the communities in which we live and work by showing our support and care for the poor, the sick, the underprivileged and the aged. Suppliers are encouraged to support us and also seek similar opportunities in area of Corporate Social Responsibility.

4.2. Environmental Responsibility

Local environmental laws and practices such as those pertaining to waste disposal (proper handling of toxic and hazardous waste, segregation where regulated, etc), air emissions and pollution must be complied with. Suppliers must endeavour to minimise the impact of their operations on the environment.

5. Non-Discriminatory & Ethical Employment

5.1. Non-Discriminatory Employment

Suppliers shall apply fair and ethical standards in their employment practices. This includes non-discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the bases of race, ethnicity, gender, national origin, age, religion, marital status, disability, sexual orientation or gender identity.

5.2. Ethical Employment

Suppliers will comply with all national laws on wages and working hours as well as local standards regarding child labour and minimum age.

6. Use of Information

6.1. Insider Trading

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

6.2. Proprietary Information

Any information used by Suppliers in their business relationship with ComfortDelGro that is either not public and/or proprietary must be protected against loss and infringement. Any disclosure or use of such information other than for officially stated purposes must first be authorised by ComfortDelGro.

7. Ethical Concerns

If any Supplier has an actual or potential ethical concern related to the Policy, they can make use of the ComfortDelGro Alert Line.

ComfortDelGro Alert Line

The ComfortDelGro Alert Line comprising the following personnel has been set up to facilitate the reporting of incidents and the handling of information or evidence on matters that will give rise to whistle blowing. You may contact:

Group Chief Internal Audit Officer

DID: +65 6383 7010

Email to: gcao@comfordelgro.com

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

For ComfortDelGro Corp, email to: ARC_Chairman@comfordelgro.com

For SBS Transit Ltd, email to: ARC_Chairman@sbstransit.com.sg

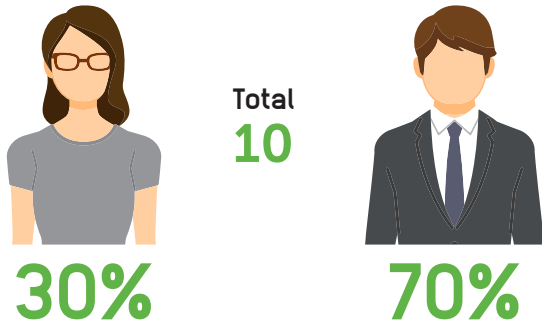
For Vicom Ltd, email to: ARC_Chairman@vicom.com.sg

Annex B: Workplace Safety & Health Committees Across the Group

Country	Business Unit	Workplace Safety & Health Committee or Similar	Company Emergency Response Team or Similar	Risk Management Committee	Other Safety-related Committee	Nil
Singapore	All Business units with the exception of:	✓	✓	✓		
	ComfortDelGro Driving Centre	✓	✓	✓	✓	
	ComfortDelGro Rent-A-Car			✓		
	SBS Transit	✓	✓			
Australia	CDC in NSW	✓	✓			
	CDC in Victoria	✓	✓		✓	
	Swan Taxis	✓			✓	
China	East China		✓		✓	
	North China					✓
	South China		✓		✓	
	West China	✓				
Ireland	ComfortDelGro Irish Citylink					✓
United Kingdom	CityFleet Networks		✓	✓		
	Metroline	✓				
	Scottish Citylink Coaches	✓				
Vietnam	Vinataxi				✓	
Malaysia	CityLimo Leasing (M)					✓

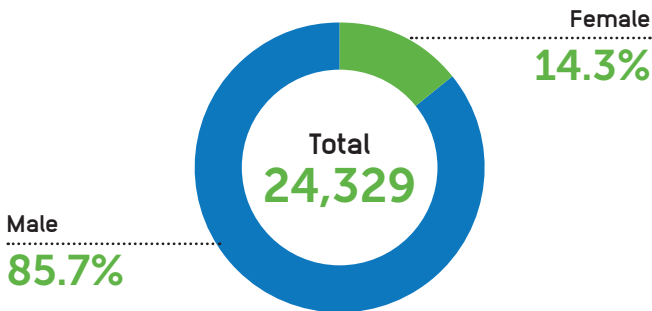
Annex C: Detailed Information on Employees and Other Workers

ComfortDelGro Corporation's Board of Directors By Gender



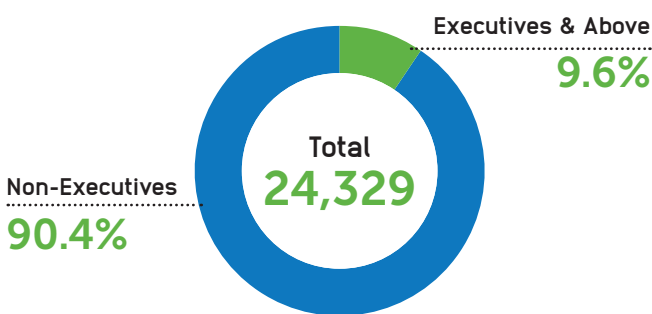
	Female	Male	Total
SBS Transit	30.0%	70.0%	10
VICOM	30.0%	70.0%	10

Employees By Gender



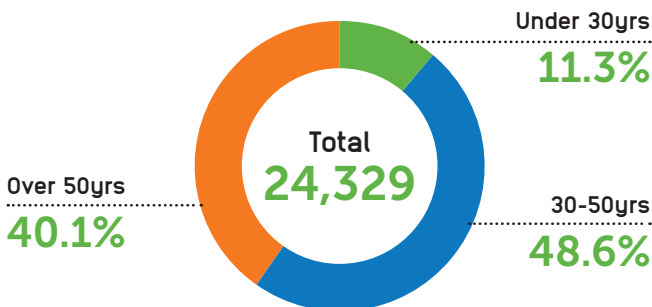
	Female	Male	Total
SBS Transit	10.2%	89.8%	11,002
VICOM	23.3%	76.7%	866

Employees By Category



	Non-Executives	Executives & Above	Total
SBS Transit	91.4%	8.6%	11,002
VICOM	53.2%	46.8%	866

Employees By Age



	Under 30yrs	30-50yrs	Over 50yrs	Total
SBS Transit	12.1%	49.5%	38.4%	11,002
VICOM	23.6%	55.9%	20.5%	866

Employees By Country, Gender, Employment Type and Contract

SINGAPORE

13,773 Employees

	Type of Contract		Type of Employment	
	Permanent	Temporary	Full-time	Part-time
Male	79.5%	7.1%	81.4%	5.2%
Female	11.4%	2.0%	11.6%	1.8%
Total	90.9%	9.1%	93.0%	7.0%

UNITED KINGDOM & IRELAND

5,824 Employees

	Type of Contract		Type of Employment	
	Permanent	Temporary	Full-time	Part-time
Male	88.6%	0.1%	86.0%	2.7%
Female	11.3%	-	10.0%	1.3%
Total	99.9%	0.1%	96.0%	4.0%

AUSTRALIA

3,790 Employees

	Type of Contract		Type of Employment	
	Permanent	Temporary	Full-time	Part-time
Male	68.6%	14.4%	65.5%	18.2%
Female	10.7%	6.3%	8.4%	7.9%
Total	79.3%	20.7%	73.9%	26.1%

CHINA

818 Employees

	Type of Contract		Type of Employment	
	Permanent	Temporary	Full-time	Part-time
Male	37.3%	24.5%	61.7%	-
Female	25.4%	12.8%	38.3%	-
Total	62.7%	37.3%	100.0%	-

VIETNAM

82 Employees

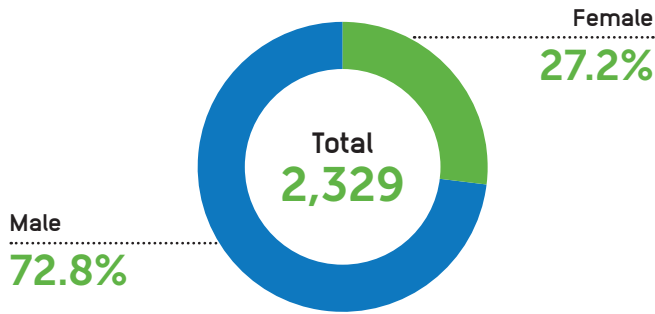
	Type of Contract		Type of Employment	
	Permanent	Temporary	Full-time	Part-time
Male	46.3%	15.9%	46.3%	15.9%
Female	32.9%	4.9%	32.9%	4.9%
Total	79.2%	20.8%	79.2%	20.8%

MALAYSIA

42 Employees

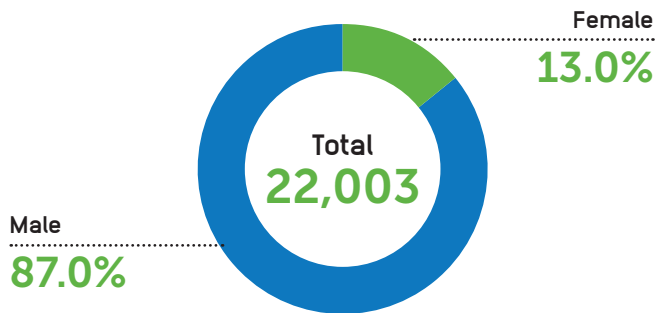
	Type of Contract		Type of Employment	
	Permanent	Temporary	Full-time	Part-time
Male	9.5%	57.1%	66.7%	-
Female	14.3%	19.1%	33.3%	-
Total	23.8%	76.2%	100.0%	-

Executives And Above By Gender



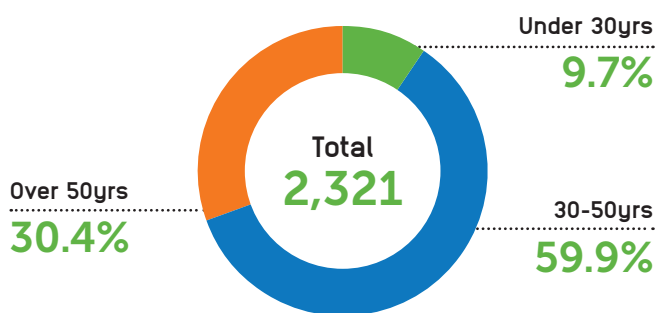
	Female	Male	Total
SBS Transit	19.7%	80.3%	950
VICOM	20.2%	79.8%	405

Non-Executives By Gender



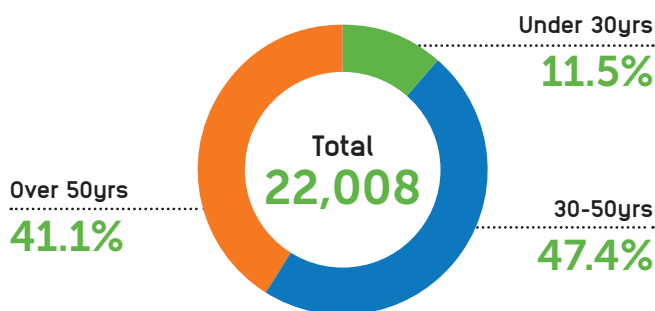
	Female	Male	Total
SBS Transit	9.3%	90.7%	10,052
VICOM	26.0%	74.0%	461

Executives And Above By Age



	Under 30yrs	30-50yrs	Over 50yrs	Total
SBS Transit	8.6%	57.0%	34.4%	947
VICOM	15.3%	63.2%	21.5%	405

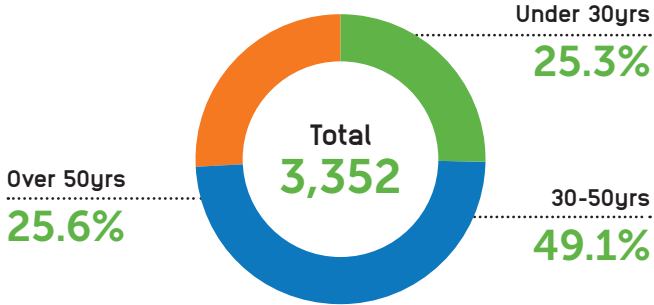
Non-Executives By Age



	Under 30yrs	30-50yrs	Over 50yrs	Total
SBS Transit	12.5%	48.8%	38.7%	10,055
VICOM	30.8%	49.5%	19.7%	461

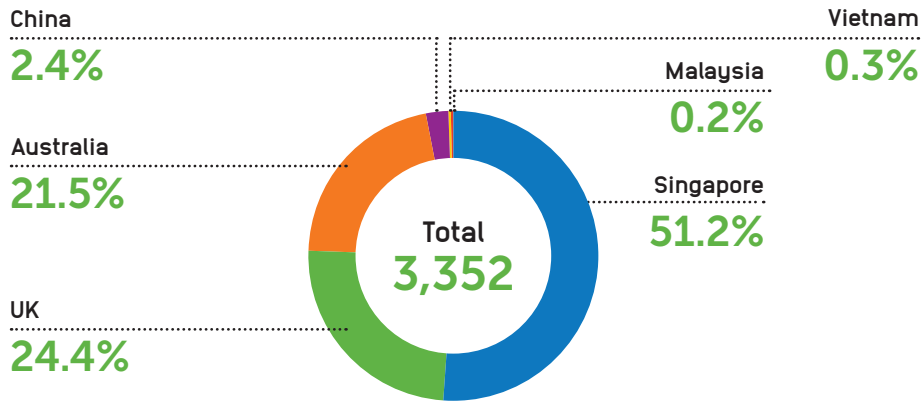
ANNEX C: DETAILED INFORMATION ON EMPLOYEES AND OTHER WORKERS

New Hires By Age

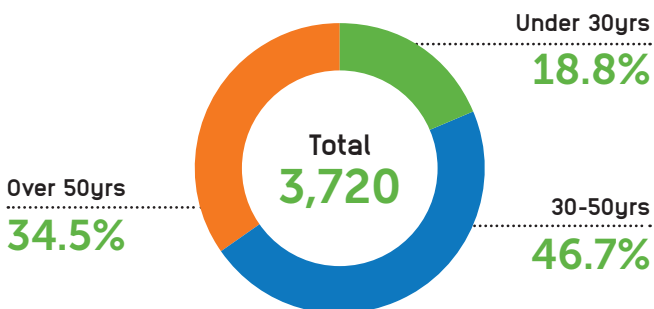


	Under 30yrs	30-50yrs	Over 50yrs	Total
SBS Transit	18.5%	50.4%	31.1%	1,226
VICOM	50.3%	44.7%	5.0%	179

New Hires By Countries



Staff Turnover By Age



	Under 30yrs	30-50yrs	Over 50yrs	Total
SBS Transit	13.2%	45.6%	41.2%	1,318
VICOM	34.2%	56.6%	9.2%	152

Data has been collected by the individual Business Units using a standard template to ensure consistency in understanding and uniformity in data submission. The completed templates are submitted to the Group Human Resource's Singapore corporate office twice a year for review and compilation.

Annex D: GRI Content Index

GRI STANDARD NUMBER	DISCLOSURE NUMBER	CHAPTER / REMARKS	PAGE NUMBER
GRI 101: Foundation 2016			
General Disclosures			
GRI 102 : General Disclosures 2016	102-1 Name of the organisation	About this Report	1
	102-2 Activities, brands, products, and services	Annual Report, Operations Review	AR 32-57
	102-3 Location of headquarters	Singapore	
	102-4 Location of operations	Annual Report, Global Footprint	AR 2-3
	102-5 Ownership and legal form	ComfortDelGro Corporation Limited as well as its subsidiaries SBS Transit Ltd and VICOM Ltd are listed at the Singapore Stock Exchange.	
	102-6 Markets served	Annual Report, Operations Review	AR 32-57
	102-7 Scale of the organisation	Annual Report, Global Footprint Annual Report, Group Financial Highlights	AR 2-3 AR 13-15
	102-8 Information on employees and other workers	Annex C: Detailed information on employees and other workers No significant number of different employment contracts, of non-permanent employees or of supervised workers. No significant variations in employment numbers.	55-58
	102-9 Supply chain	Our Approach to Sustainability: Managing Our Supply Chain	19
	102-10 Significant changes to the organisation and its supply chain	Annual Report, Operations Review	AR 32-57
	102-11 Precautionary Principle or approach	Our Approach to Sustainability: Sustainability and Risk Governance	15
	102-12 External initiatives	Our Approach to Sustainability: Sustainability and Risk Governance Environmental: Energy Efficiency Social: Diversity and Non-discrimination	15 25-26 39
	102-13 Membership of associations	National Taxi Association Global Compact Network Singapore	
	102-14 Statement from senior decision-maker	Our Approach to Sustainability	8
	102-16 Values, principles, standards, and norms of behaviour	Annual Report, Inside front cover Our Approach to Sustainability: Sustainability and Risk Governance	AR Inside front cover 15
	102-18 Governance structure	Annual Report, Corporate Governance About this Report Our Approach to Sustainability: Sustainability and Risk Governance Social: Health & Safety Annex B: Workplace Safety & Health Committees Across the Group	AR 59-74 1 15 32 54
	102-40 List of stakeholder groups	Our Approach to Sustainability: Our Stakeholders	16-17
	102-41 Collective bargaining agreements	Social: Employee Engagement	36
	102-42 Identifying and selecting stakeholders	Our Approach to Sustainability: Our Stakeholders	16
	102-43 Approach to stakeholder engagement	Our Approach to Sustainability: Our Stakeholders	16-17
102-44 Key topics and concerns raised	Our Approach to Sustainability: Our Stakeholders	16-17	
102-45 Entities included in the consolidated financial statements	Annual Report, Directories About this Report	AR 81-84 1	

ANNEX D: GRI CONTENT INDEX

GRI STANDARD NUMBER	DISCLOSURE NUMBER	CHAPTER / REMARKS	PAGE NUMBER
GRI 101: Foundation 2016			
General Disclosures			
	102-46 Defining report content and topic Boundaries	Our Approach to Sustainability: Materiality	13
	102-47 List of material topics	Our Approach to Sustainability: Materiality	13
	102-48 Restatements of information	No restatements of information in 2019	
	102-49 Changes in reporting	About this Report	1
	102-50 Reporting period	About this Report	1
	102-51 Date of most recent report	27 March 2019	
	102-52 Reporting cycle	About this Report	1
	102-53 Contact point for questions regarding the report	About this Report	1
	102-54 Claims of reporting in accordance with the GRI Standards	About this Report	1
	102-55 GRI content index	Annex D: GRI Content Index	59-63
	102-56 External assurance	About this Report	1
Topic Specific Disclosures			
Economic Performance			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Economic	13 20-21
	103-2 The management approach and its components	Economic	20-21
	103-3 Evaluation of the management approach	Economic	20-21
GRI 201 : Economic Performance 2016	201-1 Direct economic value generated and distributed	Economic	20-21
Anti-Corruption			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality	13
		Our Approach to Sustainability: Our Stakeholders	17
		Our Approach to Sustainability: Managing Our Supply Chain	19
103-2 The management approach and its components	Our Approach to Sustainability: Materiality Our Approach to Sustainability: Our Stakeholders Our Approach to Sustainability: Managing Our Supply Chain Annual Report, Risk Management	13	17
		19	AR 78-80
		AR 78-80	AR 78-80
GRI 205 : Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	Our Approach to Sustainability: Managing Our Supply Chain Governance: Anti-corruption	19 49
		Governance: Anti-corruption	49
205-3 Confirmed incidents of corruption and actions taken	Governance: Anti-corruption		49
Energy			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Environmental: Energy Efficiency	13 23-27
		Environmental: Energy Efficiency	23-27
		Environmental: Energy Efficiency	23-27
GRI 302 : Energy 2016	302-1 Energy consumption within the organisation	Environmental: Energy Efficiency	25-26

GRI STANDARD NUMBER	DISCLOSURE NUMBER	CHAPTER / REMARKS	PAGE NUMBER
Water			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Environmental: Water Consumption	13 30
	103-2 The management approach and its components	Environmental: Water Consumption	30
	103-3 Evaluation of the management approach	Environmental: Water Consumption	30
GRI 303 : Water 2016	303-1 Water withdrawal by source	Environmental: Water Consumption About 97% of water consumed by the Group in 2019 is from municipal water supplies, and about 3% is from rainwater.	30
Emissions			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Environmental: Energy Efficiency	13 23-27
	103-2 The management approach and its components	Environmental: Energy Efficiency	23-27
	103-3 Evaluation of the management approach	Environmental: Energy Efficiency	23-27
GRI 305 : Emissions 2016	305-1 Direct (Scope 1) GHG emissions	In 2019, Scope 1 GHG emissions for ComfortDelGro Group, SBS Transit and VICOM were 931,843 tonnes CO ₂ e, 407,461 tonnes CO ₂ e and 317 tonnes CO ₂ e respectively. Emission factors for Scope 1 emissions are sourced from the World Resources Institute's GHG Protocol tools for stationary combustion (version 4.1) and for transport or mobile sources (version 2.6).	
	305-2 Energy indirect (Scope 2) GHG emissions	In 2019, Scope 2 GHG emissions for ComfortDelGro Group, SBS Transit and VICOM were 204,262 tonnes CO ₂ e, 189,881 tonnes CO ₂ e and 2,236 tonnes CO ₂ e respectively. Emission factors for Scope 2 emissions are from Singapore's Energy Market Authority, Australia's Department of the Environment and Energy, the UK's Department for Environment, Food & Rural Affairs, and Sustainable Energy Authority of Ireland. CO ₂ , CH ₄ and N ₂ O are included in the calculations for Australia and the UK, while only CO ₂ is included for Singapore.	
	305-4 GHG emissions intensity	GHG emissions intensity figure includes Scope 1 and Scope 2 emissions. CO ₂ , CH ₄ and N ₂ O are included in the calculations for Australia and the UK, while only CO ₂ is included for Singapore.	26
Effluents and Waste			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Environmental: Waste Management	13 28-29
	103-2 The management approach and its components	Environmental: Waste Management	28-29
	103-3 Evaluation of the management approach	Environmental: Waste Management	28-29
GRI 306 : Effluents and Waste 2016	306-2 Waste by type and disposal method	Environmental: Waste Management	28-29

ANNEX D: GRI CONTENT INDEX

GRI STANDARD NUMBER	DISCLOSURE NUMBER	CHAPTER / REMARKS	PAGE NUMBER
Labour-Management Relations			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Employee Engagement	13 36-37
	103-2 The management approach and its components	Social: Employee Engagement	36-37
	103-3 Evaluation of the management approach	Social: Employee Engagement	36-37
GRI 402 : Labour-Management Relations 2016	402-1 Minimum notice periods regarding operational changes	Social: Employee Engagement	36-37
Occupational Health & Safety			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Health & Safety	13 32-35
	103-2 The management approach and its components	Social: Health & Safety	32-35
	103-3 Evaluation of the management approach	Social: Health & Safety	32-35
GRI 403 : Occupational Health & Safety 2016	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Social: Health & Safety Workplace non-fatal injuries were mainly due to Slips, Trips and Falls, Injury By or Struck Against Moving or Stationary Objects, and Work-related Traffic Accidents/Struck by Moving Vehicle.	33-35
	403-3 Workers with high incidence or high risk of diseases related to their occupation	Social: Health & Safety Measures have been taken to manage risks of occupational diseases.	33-35
Training and Education			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Employee Training	13 40-41
	103-2 The management approach and its components	Social: Employee Training	40-41
	103-3 Evaluation of the management approach	Social: Employee Training	40-41
GRI 404 : Training and Education 2016	404-1 Average hours of training per year per employee	Social: Employee Training	40
	404-3 Percentage of employees receiving regular performance and career development reviews	Social: Employee Training All our employees receive performance and career development reviews annually.	40
Diversity and Equal Opportunity			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Diversity and Non-discrimination	13 39
	103-2 The management approach and its components	Social: Diversity and Non-discrimination	39
	103-3 Evaluation of the management approach	Social: Diversity and Non-discrimination	39
GRI 405 : Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Social: Diversity and Non-discrimination Annex C: Detailed information on employees and other workers	39 57

GRI STANDARD NUMBER	DISCLOSURE NUMBER	CHAPTER / REMARKS	PAGE NUMBER
Non-discrimination			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Diversity and Non-discrimination	13 39
	103-2 The management approach and its components	Social: Diversity and Non-discrimination	39
	103-3 Evaluation of the management approach	Social: Diversity and Non-discrimination	39
GRI 406 : Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	There were zero incidents of discrimination reported in 2019.	
Local Communities			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Local Communities	13 44-47
	103-2 The management approach and its components	Social: Local Communities	44-47
	103-3 Evaluation of the management approach	Social: Local Communities	44-47
GRI 413 : Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programmes	Social: Local Communities Almost all of our operations have implemented local community engagement or development programmes.	44-47
	413-2 Operations with significant actual and potential negative impacts on local communities	Social: Local Communities	44-47
Public Policy			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Our Approach to Sustainability: Our Stakeholders	13 17
	103-2 The management approach and its components	Our Approach to Sustainability: Materiality Our Approach to Sustainability: Our Stakeholders	13 17
	103-3 Evaluation of the management approach	Our Approach to Sustainability: Our Stakeholders	17
GRI 415 : Public Policy 2016	415-1 Political contributions	ComfortDelGro has no political affiliations nor did it make any political contributions during the year.	
Customer Health & Safety			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Health & Safety	13 32-33
	103-2 The management approach and its components	Social: Health & Safety	32-33, 35
	103-3 Evaluation of the management approach	Social: Health & Safety	32-35
GRI 416 : Customer Health & Safety 2016	416-1 Assessment of the health & safety impacts of product and service categories	All of our operations are regularly assessed for health & safety improvements.	
	416-2 Incidents of non-compliance concerning the health & safety impacts of products and services	Social: Health & Safety	35
Accessibility			
GRI 103 : Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Our Approach to Sustainability: Materiality Social: Accessibility	13 42-43
	103-2 The management approach and its components	Social: Accessibility	42-43
	103-3 Evaluation of the management approach	Social: Accessibility	42-43
Non-GRI	Percentage of wheelchair accessible buses	Social: Accessibility	43