



#### **Reporting Period**

This statement describes S P Setia Group's sustainability activities for the period from 1 January 2020 to 31 December 2020.



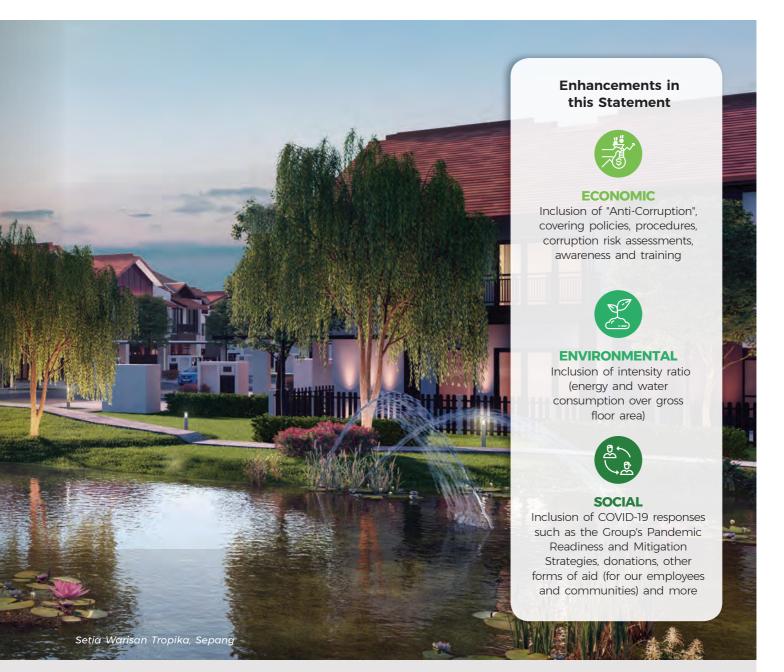
#### **Reporting Scope**

- S P Setia established its sustainability framework and standards in accordance with:
- Bursa Securities' Listing Requirements; and
- Bursa Securities' Sustainability Reporting Guide (2<sup>nd</sup> edition).

We advocate continuous improvement and strive to achieve the best in our sustainability efforts. In the previous year, selected key sections in the following sustainability frameworks were adopted:

- Global Reporting Initiative ("GRI");
- United Nations Sustainable Development Goals ("UNSDGs"); and
- Global Real Estate Sustainability Benchmark ("GRESB").

For this year's statement, we have incorporated some enhancements, including recommended improvements by these global sustainability frameworks, in our sustainability disclosures.



#### **Entities included in this Statement**

The information and figures in this statement refer to S P Setia Berhad and its active ongoing projects within Malaysia, Vietnam, Singapore and Australia, unless otherwise stated. The 'RM' sign used in this report refers to Ringgit Malaysia which is also the functional currency.

This is our fifth sustainability statement and we have engaged external consultants to perform an annual gap analysis and identify areas for improvement based on the sustainability frameworks and standards.

The sustainability objectives, strategies and action plans established in the coming years would take into consideration these global sustainability practices. This is further explained in "Our Sustainability Journey" section below.



#### Feedback

Stakeholders' feedback is important to us. We welcome any feedback on this Statement and any aspect of our sustainability performance. Please address all feedback to our Management Risk Team at groupriskmanagement@spsetia.com.

Key Message

#### SUSTAINABILITY STATEMENT

#### **OUR SUSTAINABILITY JOURNEY**

S P Setia Berhad had commenced its sustainability journey about half a decade ago in 2016. We started off with a compliance-based report, in accordance with Bursa Securities' Sustainability Reporting Guide and received annual feedback from Bursa Securities' on areas of improvement for disclosure purposes.

Since then, we have stepped up our sustainability efforts. We reached another milestone in 2019 with the establishment of S P Setia's Sustainability Framework where we formalised the sustainability processes across the Group, with reference to GRI Standards and UNSDGs. This included determining

our material sustainability matters via stakeholders' and business impact analyses, enhancement of data analysis disclosure and scope of reporting.

We further enhanced our sustainability framework to integrate with the Group's strategic business goals, established a Sustainability Mission Statement to encompass a broader perspective and refined our sustainability roadmap to ensure our sustainability management was more holistic in its approach. This sustainability roadmap was approved by the Management Risk Team ("MRT") on 21 January 2021, post-financial year.



#### **Embedment and Full Integration**

- To ensure full integration to business strategies, relevant KPIs and achievement of relevant UNSDGs.
- · To continuously improve on implementation as well as tracking and monitoring of sustainability initiatives.
- To enhance culture embedment
- To achieve sustainability excellence.

# 2021 - 2022

2020

#### **Process Enhancement and Integration to Business Strategies**

- To establish the Setia Sustainability Statement and Policy which includes roles and responsibilities.
- To establish sustainability initiatives based on key prioritised areas and periodic reporting mechanism.
- To ensure integration to business strategies (review of relevant process) and linkage to relevant KPIs.
- To develop and build sustainability infrastructure consideration on people, process and technology.

#### Capacity enhancement and roll-out

- Establishment of the Sustainability Management Unit under Group Risk, Integrity & Governance Division.
- Focus on prioritised action plans to close the identified gaps.
- Established a playbook to facilitate data compilation group-wide.

# 2019

#### **Building the base and gaps identification**

- Established the Setia Sustainability Framework and reaffirmed material matters via stakeholders and business impact analyses.
- Identified areas of improvement, enhancement of data analysis disclosure and scope of reporting to include all international Business Units.
- Obtained external assurance from Messrs. Ernst & Young PLT for the Sustainability Statement Disclosure as recommended by Bursa Securities.

# 2016 - 2018

#### **Compliance-based Reporting**

- The yearly sustainability reporting was based on the Bursa Securities' Sustainability Reporting Guide.
- Received yearly Bursa Securities' feedback on gaps identified and areas for improvement in terms of disclosure.

During the year, we restructured our organisation pyramid and a Sustainability Management Unit ("SMU") was established under Group Risk, Integrity & Governance ("GRIG") Division to lead the sustainability efforts throughout the Group. The SMU led numerous awareness and briefing sessions to all relevant Business Units across the Group to instil a culture that not only supports sustainability, but also fosters common understanding among various parties on the Group's sustainability initiatives.

SMU with assistance from external consultants, had established sustainability action plans to manage gaps identified in prior years. Sustainability action plans are prioritised based on its materiality and impact to the Group and stakeholders. Thereafter, SMU will continuously monitor the implementation status of the sustainability action plans and report to the Risk Management Committee ("RMC") and Board of Directors ("Board") on a quarterly basis.

#### Moving forward

We recognise that the assimilation of sustainability consistently throughout the Group is an arduous process. As we progress on our sustainability journey, we will constantly identify new areas of improvements – innovative, yet sustainable solutions – to be implemented across our project developments. Through multiple awareness and briefing sessions led by our GRIG team, we are confident that the level of awareness and adoption of sustainable measures by our people have improved.

Notwithstanding, we will continue to strengthen our sustainability process within the Group through the Adopt, Consolidate and Align approach as described below.

#### **Adopt**

Good sustainability practices such as:

- Global Reporting Initiatives; and
- United Nations Sustainable
   Development Goals.

#### Alian

Our sustainability efforts with:

- Industry best practices;
- Business plans and strategies; and
- Risk management.
   This alignment enables integrated efforts and reduces duplicating objectives.

#### Consolidate

Relevant business processes, data and information related to sustainability into a more robust, integrated and comprehensive database, aligning it with our business objectives, strategies and action plans. This will provide meaningful parameters for S P Setia Group.

In the next two (2) years, we plan to further enhance our sustainability processes and integrate these sustainability initiatives with our business strategies. This includes refining roles and responsibilities as our sustainability processes grow and mature. For sustainability action plans which were identified during the year, we will continue to ensure timely implementation and monitor the progress made.

A key area is the identification of sustainability targets and metrics, taking into consideration sustainability frameworks, international standards and global sustainability best practices. Business processes and strategies will then have to be reviewed and revised ensuring linkage, and embedment of sustainability culture to achieve identified sustainability targets and metrics.

Key Message

#### SUSTAINABILITY STATEMENT

#### **2020 HIGHLIGHTS**

During the year, we have faced many challenges following the COVID-19 outbreak worldwide, including multiple Movement Control Orders ("MCOs") in Malaysia since March 2020, which affected some of our business operations.

In response to the challenges ahead, the Group proactively implemented several sustainability initiatives that focused on the impact of COVID-19 and achieved greater milestones in our sustainability journey.

Our focus this year is to assist both our internal and external stakeholders to counter the effects of the pandemic. Notwithstanding, our sustainability initiatives relating to the other sustainability factors were carried out, wherever possible, employing multiple fronts and action plans to ensure our objectives were achieved.

#### **COVID-19 Response**

In anticipation of the pandemic worsening subsequent to the declaration of Public Health Emergency of International Concern by the World Health Organisation in January 2020, the Group swiftly prepared an extensive pandemic response plan which was tabled to the Group Action Committee in February 2020. The result of this was the establishment of Setia Pandemic Taskforce, with the objective of monitoring and tracking pandemic-related matters. The taskforce convened its first meeting on 13 March 2020, shortly before the declaration of

Movement Control Order ("MCO") by the Malaysian Government commencing 18 March 2020.

The taskforce consists of members from various Business Units across the Group covering human resources, risk, integrity and governance, finance, marketing, branding and communications, information technology and quality management, to ensure the smooth implementation of the pandemic response and mitigation strategies. On a close monitoring basis, the taskforce continuously updated the Strategic

Executive Team ("SET") on the progress made, proposed next steps and communication initiatives to Team Setia.

The chart below describes the Group's Readiness and Mitigation Strategies, part of the Setia Pandemic Plan, identified to manage the COVID-19 outbreak, covering four (4) areas, namely human capital, operational and financial strategies, business continuity and systems, and continuous communication and engagement.



Updates were made to the relevant Human Resources Policies which were affected, such as Work From Home policy, leave policy and travel policy. During the year, the Group Marketing and Communications team launched the "Stay Home. Stay Setia" Campaign via our Setia Digital Platform. Our IT Support Policy was reviewed and no further actions were required as the current procedures were sufficient to cover IT support during business-asusual or crisis situations.

While the curtain has yet to drop for the COVID-19 pandemic, the Group has taken additional steps to further enhance its Business Continuity Plan to include specific crisis response and communications plan in preparation for any other pandemic outbreak in the future.

In May 2020, post-MCO, employees were allowed to resume work in the office premise. Several guidelines were put in place to ensure employee health as well as to minimise contact and any transmission risks. A Return to Work ("RTW") Protocol, which specified the new working arrangement, was rolled out to ensure health and safety measures such as safe physical distancing were adhered to at all times.



Common areas such as the gaming area, gym and training centre were closed. The Protocol also provided other general guidelines such as avoiding physical contact and touching surfaces unnecessarily, wearing a face mask at all times, sanitising hands frequently, and maintaining at least one (1) metre apart from one another.

Upon entering the office premises and project sites, employees were required to complete a Health Declaration Form and temperature screening. For offices

at our headquarters ("HQ"), employees were required to complete the health declaration via an internal online form and check-in at the office premises using the MySejahtera App launched by the government to assist in contact tracing. Thermal scanners were deployed at the entrance of the building to capture employees' body temperature, thus, reducing both contact and manual work.





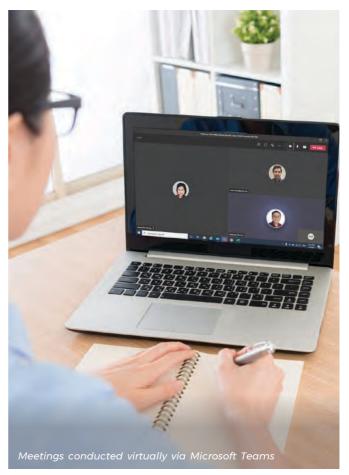


We successfully installed 37 thermal scanner devices across our offices and sales galleries/welcome centres in Malaysia as well as seven (7) units across Centralised Labour Quarters ("CLQs") which are occupied by our workers. The initiative involved a total investment cost of RM296,376. At project sites, we implemented ID tags with QR Codes to monitor the movement of construction workers within sites. Screening of construction workers was also conducted.

The sudden outbreak of COVID-19 had called for an acceleration in the digital transformation journey across S P Setia Group. One of the initiatives introduced was the Setia M365 Mover Programme which was focused on replacing obsolete Microsoft Office and Microsoft Exchange servers, thus providing employees with tools to be more productive and flexible as they adapted to the work from home lifestyle.

Within three (3) weeks, we managed to convert 1,600 laptops "online", providing our employees with tools to enable video conferences, meetings, file collaboration with internal as well as external parties and more. These laptops were also secured to protect employee credentials. This initiative involved investments amounting to RM2.88 million.

As work processes moved to the "online" space, the Group launched Security First, an initiative to keep our business safe. The focus of this initiative was to increase security capabilities, thus ensuring access to technology and processes remained secure across the Group. This includes protecting the user device, managing control access and conducting regular cybersecurity awareness sessions on an ongoing basis.



During the year, the Group, through the Government-Linked Companies and Government-Linked Investment Companies' Disaster Response Network ("GDRN") Collective Contribution to the Ministry of Health, pledged RM1 million to provide necessary personal protective equipment and ventilators to front-liners and patients respectively, at selected hospitals.

In addition, the Group spent a total of RM2.83 million to provide donations and relief to our employees, workers, and other stakeholders. These included medical supplies, food supply aid, personal hygiene kits, necessary health equipment as well as swab tests.















Total RM2,829,984 Key Message

#### SUSTAINABILITY STATEMENT

Food aid initiatives were rolled out to support our workers living in our workers' dormitories and other centralised labour quarters. The contribution was carried out during the three-month MCO period to provide workers with basic needs such as food and groceries.

The Group complied with the Ministry of International Trade and Industry's ("MITI") regulations that requires all foreign workers to take the COVID-19 swab tests. We also took additional precautionary measures by extending the swab test requirements to our local workers as well. These workers were also trained to recognise symptoms and the necessary steps to be taken as this will allow early detection and avoid the widespread of this infectious disease.

A security cabin for CLQ was set up at Setia EcoHill, Setia EcoHill 2 and Setia Mayuri to monitor movements within the project site area as well as to allow the screening of workers upon entering and exiting the area.

Other forms of aid were also provided during the various MCO periods, such as rental waivers and discounts. For Setia Eco Park, rental waivers were extended to February 2021 to help tenants, especially those in the retail and F&B sectors, brace through this challenging period as the economy remained soft.



#### **Property Development/Projects**



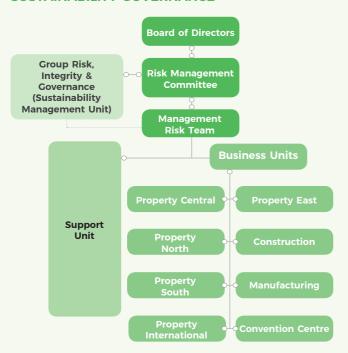
#### **GOALS AND PROGRESS**

The sustainability principle, strategies, performance targets and indicators remain the same for FY2020. Actual achievements during the year have exceeded our established performance targets.

S P Setia Berhad recognises that sustainability management is a continuous process and strives to refine its goals and performance indicators as we go along this journey.

Sustainability Agenda	Sustainability Principle	Strategies/Activities	Performance Indicators	Targets	Actual Achievements for FY2020
Products & Services	Delivering quality products	Customer satisfaction     low defects claim	Customer satisfaction survey	• > 80/100	• 79% (2019 - 86%)
Economic Growth & Benefits		Close working relationship with suppliers, vendors and business associates	Contractors' quality excellence such as In-Process Construction Quality and Construction Performance Assessment	• ICQ: > 75% • CPA: > 75%	• ICQ: 82% (2019 - 81%) • CPA: 76% (2019 - 79%)
Climate Change	Environmentally- friendly developments	<ul> <li>Introduce pioneering green and sustainable projects</li> <li>Community and people consideration</li> </ul>	Awards and recognitions     Green certification	At least 10 awards and recognitions     At least 1 green certification for each upcoming project	10 awards and recognitions received (2019 - 26 awards)     5 active green certifications (2019 - 4 certifications)
Biodiversity			Number of birds, vegetation and other species	Increasing number as compared to the previous	Status quo (no research carried out for the year)
Energy & Water				year	
Ethics & Integrity	Maintain high integrity culture	Zero tolerance to corruption and bribery     Continuous education and awareness sessions	Number of proven bribery and corruption-related cases	Zero proven cases	Zero proven bribery and corruption related cases reported (2019 - 0)
	Retaining talent	Employee performance and retention	Employee     happiness survey     rating	• > 80/100	• 81% (2019 - 86%)
Human Capital		Conducive working environment	Low employee turnover	Single digit rate	• 6.66% employee turnover (2019 - 7.56%)
	Diversity appreciation	Ensuring equal opportunities and reduce discrimination	Gender Diversity:     Male to Female     ratio	• M/F : 55:45	• 57:43 (2019 - 57:43).
Community Engagement	Creating communities	Accessible     developments     - infrastructure     accessibility such as     roads and public     transportation access     Green leisure     developments such as     parks and gardens     Excellent features,     amenities and facilities	Percentage of development allocated to green spaces and amenities	• > 10%	More than 10% of developments allocated to green spaces and amenities for our Eco-series projects
Health & Safety Security	Providing safe and conducive working environment	Zero major incidents	Number of major incidents	• Zero cases	• Zero major incidents reported (2019 - 0%)

#### SUSTAINABILITY GOVERNANCE



The RMC monitors the consistent enforcement of Sustainability Policy across S P Setia Group and reviews this on a regular basis to ensure it remains relevant to the business and operations; aligned to the prevailing laws and regulations; and in compliance to the Group's sustainability targets and goals. The committee articulates, challenges and provides guidance on identified sustainability matters, materiality ratings, targets and indicators, and sustainability action plans.

S P Setia Group's sustainability operational management is delegated to the MRT, which consists of members of the Group's Senior Management. The MRT is supported by Business Units that focus on operational risks and monitor the progress of our EES activities. On a quarterly basis, the MRT also deliberates on material sustainability matters relating to EES risks, new opportunities as well as keeps the RMC and Board updated on these issues.

#### **Building Sustainable Communities For All**

We aim to grow our shareholders' value responsibly by building sustainable developments and enriching our local communities, both economically and socially while remaining mindful and respectful of the environment.

#### **Sustainability Mission Statement**

Post-financial year, we established the Sustainability Mission Statement which defines our sustainability goals and strengthens our sustainability practices within the Group, as follows:



#### **Sustainability Objectives**

S P Setia Group remains committed to meeting its various stakeholders' interests while achieving its strategic objectives. In order to achieve this effectively, it is critical for the Group to possess the capabilities to manage its material sustainability matters to an acceptable level.

We believe that the high standards of corporate governance forms a strong basis for safeguarding stakeholders' interests. By being responsive and transparent in our business practices, we can demonstrate our accountability and ensure long-term business growth. We also continue to act as early adopters of new regulations, best practices, policies and procedures throughout our operations.

The Board has a stewardship responsibility to understand the material sustainability matters, provide guidance on dealing with these matters and ensure they are managed proactively in a structured and consistent manner.

**Key Business** Processes

Governance

Strategic Planning

Policies and Procedures

Regulatory Compliance

Reporting and Monitoring

Assurance and Verification

#### S P SETIA BERHAD SUSTAINABILITY FRAMEWORK

### **Our Stakeholders** Anticipate and respond to changes in the business environment Shareholders & Investors Contractors & **Suppliers** Media Customers Employees

Integrate sustainability goals into business process















# Risk Management

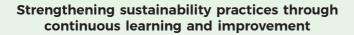
Budget and Finanical Planning

Brand Management

Talent Management

Digital Transformation

#### **RISKS AND OPPORTUNITIES**



Our sustainability framework which was established last year, provides the overarching principle of our sustainability practices within the Group.

The framework encompasses three (3) pillars i.e. Sustainability Agenda, Our Stakeholders and Key Business Processes.

#### **Sustainability Agenda**

· details the EES matters which are important to S P Setia.

#### **Our Stakeholders**

• identification of stakeholders and how we engage them to provide value-added products and services.

#### **Key Business Processes**

• integration of sustainability into each of the key processes identified.

We have adopted the Sustainability Policy for the Group which includes:

- To integrate sustainability management into the culture, business activities and decision-making processes
- To anticipate and respond to the changing economic, environmental, social and governance landscape requirement proactively.
- To manage sustainability matters pragmatically to an acceptable level given the circumstances of each situation.
- To implement a robust Sustainability Framework that is aligned with S P Setia Group's strategic sustainability objectives and best practices.
- To continuously strive towards strengthening sustainability management practices through continuous learning and improvement.

Key Message

#### SUSTAINABILITY STATEMENT

# MATERIALITY ASSESSMENT AND KEY SUSTAINABILITY MATTERS

Annually, the material sustainability matters will be reviewed against its impact on S P Setia Group's business and stakeholders. This is done to assess the current materiality profile in order for the management to respond accordingly.

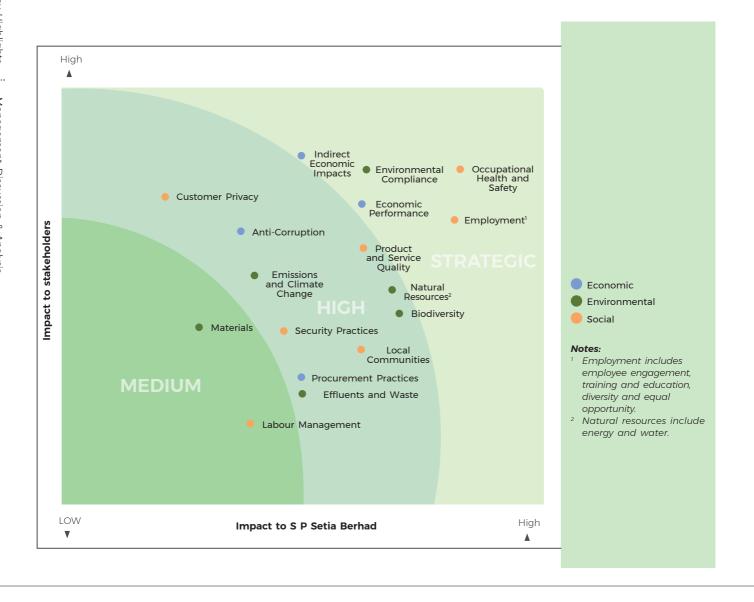
The process of materiality assessment was guided by the GRI sustainability standards, a widely adopted global standards for sustainability reporting, and as recommended by Bursa Securities for all listed entities. In addition, we have also adopted several goals under the UNSDG Agenda which we feel are important and relevant to the business and the Group.

As there were no material changes to business operations, the materiality profile was reviewed and re-assessed with the involvement of the Senior Management. Subsequently, 16 discussion sessions were conducted with the relevant Business Units to obtain acknowledgement on the materiality profile as well as to obtain additional feedback.

The current year's review revealed that the impact of "Occupational Health and Safety" and "Anti-Corruption" had increased and constituted as the main components of the Group's top 11 material matters. This also resulted in "Procurement Practices" to be excluded from the top 11 material matters, while the others remained.

In line with the Section 17A of Malaysian Anti-Corruption Commission (Amendment) Act 2018, which came into force in June 2020, the Group has established and implemented various policies and procedures to promote integrity and good governance within the Group. For specific details, please refer to the "Anti-Corruption" section on pages 167 to 168.

Naturally, "Occupational Health and Safety" increased its materiality amidst the current COVID-19 pandemic. For further details, please refer to the "COVID-19 Responses" section on pages 146 to 150 and "Occupational Health and Safety" on pages 184 to 186.



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The uncertainties and volatility of the business environment during the year had other sustainability matters take foremost importance, rendering the materiality of "Security Practices" to reduce slightly within the Group. Nonetheless, security practices remained intact and comprehensive.

Albeit the cost-cutting exercises carried out by many companies during the pandemic period, the Group maintained our security personnel to ensure our residents and employees remained safe and protected. For specific details, please refer to the "Security Practices" section on page 189.

The revised top 11 material sustainability matters critical to S P Setia Group for FY2020 were identified as follows. The details for each of the material sustainability matters are covered at the respective sections at the following pages.



#### S P Setia Group's Top 11 Material Sustainability Matters



From the revised top 11 material sustainability matters identified, the relevant UNSDGs were adopted by the Group and were reviewed to ensure alignment to the sustainability objectives, policies and agendas.

The revised top 11 material sustainability matters mapped to the UNSDGs are shown in the table below:

Material Sustainability Matters	UNSDG Reference	Why is it important
Economic	UNSDG Reference	wny is it important
Economic Performance	8 ECONOMIC GROWTH	Sustain economic growth and achieve higher levels of economic productivity to meet the needs of our shareholders and investors.
Indirect Economic Impacts	8 DEENT WORK AND ECONOMIC GROWTH  11 SUSTAINABLE CITES AND COMMUNITIES  9 PRESSTRE PROVIATION AND PRESSTRECTURE	<ul> <li>Ensure access for all adequate, safe and affordable housing and basic services.</li> <li>Provide safe, accessible and sustainable transport systems for all, improving road safety.</li> <li>Enhance inclusive and sustainable urbanisation and capacity for participatory, integrated and sustainable human settlement planning and management.</li> <li>Increase income-generating employment opportunities.</li> </ul>
Anti-Corruption	16 PEAGE AIRTIGE MOSTRONG INSTITUTIONS	Conflict of interest, bribery and corruption remain as threats to sustainable development. Transparency and accountability shall be provided to build an effective organisation.
Environment		
Natural Resources (energy and water)/ Environmental Compliance	6 AMBANITATION  7 AFFRICABLE AND GLEAN HERROY	<ul> <li>Provide access to reliable, sustainable and modern energy services.</li> <li>Increase the share of renewable energy and improve energy efficiency.</li> <li>Strengthen resilience and adaptive capacity to climate-related hazards and reduce impact on social, economic and natural systems.</li> <li>Ensure availability and sustainable management of water for all.</li> </ul>
Biodiversity	15 dir.	<ul> <li>Conserve and restore the sustainable use of terrestrial and inland freshwater ecosystems.</li> <li>Promote sustainably managed forests and combat desertification, halt and reverse land degradation, and halt and end biodiversity loss.</li> <li>Integrate ecosystem and biodiversity values into planning and development process.</li> </ul>

Risk/Opportunities	Our Responses		
Changing customer needs and increasing regulatory requirements has made the property industry challenging.	We strive to find a balance between creating value for our customers and achieving financial results to meet the needs of our stakeholders, especially shareholders and investors.  Please refer to page 164 for more details.		
Consideration of broader economic, environmental, social and governance principles in the context of direct and indirect financial performance.	Indirect economic benefits such as infrastructure investments, job opportunities and the well-being of our communities are key considerations in all our project developments, especially at our Eco-series township projects.  We have embarked on our digital transformation journey across the Group since 2019 with the objectives of unlocking business opportunities, digitalise business processes, automation and system consolidation for operational excellence and cost optimisation.  Please refer to pages 165 to 166 for more details.		
Corruption directly correlates to the branding and reputation of an organisation. A recent change in the regulatory requirement had pushed for more transparent policies and disclosures.	At S P Setia, bribery and corruption is strictly prohibited. We take a zero-tolerance approach to all forms of bribery and corruption.  We ensure that all our stakeholders such as employees, suppliers, business partners and other third parties are educated with our existing anti-bribery and corruption policies as well as Code of Conduct and Business Ethics through regulation training and briefing sessions.		
	Please refer to pages 167 to 168 for more details.		
The building sector has strong environmental impact and is heavily reliant on natural resources for its operations.  Climate-related litigation, new policies and more stringent regulations such as carbon pricing, water tariffs hike and stricter building standards are expected. Rising energy cost and carbon pricing will pose challenges to maintain profitability and sustained growth.	Environmental concerns are centric in all our property development projects. Green design such efficient use of energy and water are considered throughout the project lifecycle from design, planning to construction.  Our initiatives are guided by S P Setia's Group Environmental Management System which has been certified ISO 14001:2004, resulting in S P Setia garnering various green building awards and certification for a number of our projects.  Please refer to pages 170 to 175 for more details.		
Failure to comply with environmental regulations on conserving forests and habitats can lead to consequence of reputation and ability to achieve business operation.  A township that integrates green initiatives bodes well for the customers as there are increasing awareness on longer-term sustainability and environmental concerns.	Our eco-philosophy DNA safeguards environmental protection and advocates green initiatives to preserve the biodiversity and ecosystem. This is particularly evident in our Eco-series projects such as Setia Eco Glades, Setia Eco Park, Setia Eco Templer, and Setia Eco Gardens.  We collaborated with various environmental associations and interest groups such as Forest Research Institute Malaysia ("FRIM"), Malaysian Nature Society ("MNS"), Zoo Negara and Penang Butterfly Farm to conduct an analysis of the biodiversity landscape in the selected project locations.  Please refer to page 174 for more details.		

Overview

#### SUSTAINABILITY STATEMENT



A detailed explanation for each sustainability area of economic, environmental and social is provided in the next section.

Risk/Opportunities	Our Responses		
Training and development opportunities are provided to groom our employees to be the future leaders of S P Setia and part of our succession planning.  The outflow of talent will have an impact on S P Setia's human resources, operational efficiency and sustained growth.	Diversity and inclusion form the essence of Team Setia. We also put emphasis on workplace and employee benefits, training and development and various engagement activities.  Please refer to pages 176 to 183 for more details.		
The safety, health and wellness of employees and contractors' workers may affect work performance and productivity.  As most activities at construction sites and managed buildings are carried out by third parties, the appointed contractors are also exposed to workplace health and safety risk if the management of contractors are not sufficiently stringent.	The safety and well-being of our people is our priority. We place great emphasis on ensuring strong health and safety standards are maintained across the Group, both in our offices and at project sites.  Various programmes are in place to ensure conducive and safe workplace such as establishment of Group Safety Committee, OSHAS 18001 compliant, implementation of Quality Excellence Award Programme ("QEAP"), continuous Health, Safety and Environment ("HSE") awareness and trainings, and provision of adequate employee medical benefits and insurance.  Through our continuous and relentless safety efforts, we achieved zero Lost Time Incident ("LTI") major incidents.  Please refer to pages 184 to 186 for more details.		
Delivery of quality products and services directly affects customer satisfaction, corporate reputation and sales.	Our quality commitments are demonstrated by maintaining the ISO 9001 accreditation, our QEAP, In-process Construction Quality ("ICQ") Assessment and Construction Performance Assessment ("CPA").  During the year, our overall property development projects have exceeded the targeted score of 75%, with ICQ score at 82% and CPA score at 76% respectively.  Please refer to pages 186 to 188 for more details.		
Failure to meet legal obligations and contractual responsibility to ensure the safety of the occupant at the residential, office and commercial developments could lead to reputational and financial losses.	Providing a safe and secure environment for our customers is our top-most priority. We have assigned auxiliary police force and security guards for our townships, sales gallery and convention centres. We also constructed and installed an integrated perimeter fencing and tight security system within our projects to enhance security monitoring.  Please refer to page 189 for more details.		
Continuous engagement with the local communities provides a platform for S P Setia to achieve high quality, efficient and collaborative care that extends beyond its customers.	As a responsible corporate citizen, we established the S P Setia Foundation in 2020 to help underprivileged individuals and charitable bodies. During the year, the Foundation disbursed approximately RM2.45 million in its area of interests, namely education, general welfare and medical assistance. This was achieved via its two core programmes, namely StandTogether and the Setia Caring School Programme.  Please refer to pages 190 to 192 for more details.		

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#### SUSTAINABILITY STATEMENT

#### **DIGITAL TRANSFORMATION**

Since July 2019, S P Setia has embarked on its digital transformation initiatives to develop a future-proof digital platform and infrastructure to create better user-experience for customers and employees. This was also done in support of UNSDG 9 which is centred on Industry, Innovations and Infrastructure.

This involves building data analytics capabilities by exploring the Group's data assets to unlock business opportunities; digitalise business processes; automate and consolidate systems for operational excellence and cost optimisation; and adopt the Security First approach to mitigate cyber security risks and sustain business continuity.

Through improved productivity and engagement, the Group has been able to focus on crucial factors, which is essentially sustainable innovations for its stakeholders and future generations.

We are proud to be the first property developer in Malaysia to conduct a virtual property expo, **Setia Virtual-X**, that enables the public to visit a property expo from the comfort of their home, 24 hours a day and seven (7) days a week. The layout and flow were designed as close as possible to a physical expo to offer visitors an immersive experience.

This platform was launched on 1 August 2020 and attracted 119,617 visitors as at 31 December 2020. There were a total of 25 booths at the virtual expo, showcasing Setia's projects in Malaysia, UK, Singapore, Australia, and Vietnam. Visitors were able to browse through project details, layouts and videos at the virtual booths as well as connect with sales personnel directly via WhatsApp.

As at December 2020, a total of 912 units with signed SPAs through the Setia Virtual-X platform were sold. This amounted to a GDV of RM1.08 billion.

Investment cost: RM247,786



Setia Virtual-X lobby

**Setia On The Go (Phase 1 and 2)**, is a lifestyle app which provides users all the information on the Group's projects, community events, exclusive offers and rewards was launched. The all-in-one app also features a 360° virtual sales gallery for property viewing and instant credit checks with sales and loan tracking solutions to ease the home purchase process.

More app features such as home management (e.g. visitor registration, facility booking and maintenance fee payment) and online payments will be made available in the near future

Investment cost: RM238,660



Setia On The Go

**Setia peopleXpress** is an enhanced human capital solution which consolidates the various HR functions into a single integrated platform, hosted on cloud. This allows all employees of S P Setia Group from Malaysia and Singapore to access the system from any device, anytime and anywhere, thus improving collaboration and engagement among the various Business Units within the Group.

Currently, the platform provides users with general information related to human resources such as organisation structure, policies, leave module application and other areas. For the next phase, the focus will be on the roll-out of payroll and claims.

Investment cost: RM274,675 (in progressive payments)



Setia peopleXpress

**Setia Data Platform (Phase 1)** Predictive analysis enables our project development and planning teams to further invent and innovate new products and features for our customers. The platform, which is linked to the inventory, provides close to real-time transparency on inventory position, thus allowing the Group to reduce inventory holding.

Investment cost: RM95,400



Setia Data Platform

Our **snagR System** includes two applications, Post Vacant Possession ("VP") and Pre-Certificate of Practical Completion ("CPC") Inspection.

The Post VP application links our customers to contractors, consultants, the Customer Relations Unit and even purchasers for matters regarding handover and defect management. Whereas, the Pre-CPC application is a new application used for inspection and defect management.

With the introduction of these applications, processing and turnaround time will be greatly reduced through the instant exchange of information between the related parties. Our customers will be able to access real-time information on the project's progress status, thus elevating customer experience.

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snagR System

Investment cost: RM502,388 (Post VP), RM129,500 (Pre-CPC)

Due to the sudden COVID-19 outbreak which impacted Malaysia early this year, a few of our initiatives which were planned for the later part of the year was accelerated to support the change in working environment. For further details, please refer to COVID-19 Responses on pages 146 to 150.

We will continue to ride on the digital wave and take advantage of the emerging technologies at an early stage in order to provide smart and innovative solutions to our stakeholders. For example, big data, Al and machine learning, virtual and augmented reality, internet of things, usage of drones and 5G telecommunication technology. At the same time, we will continue to explore new digital business models that enables value-creating interactions between Setia and our stakeholders.

Key Message

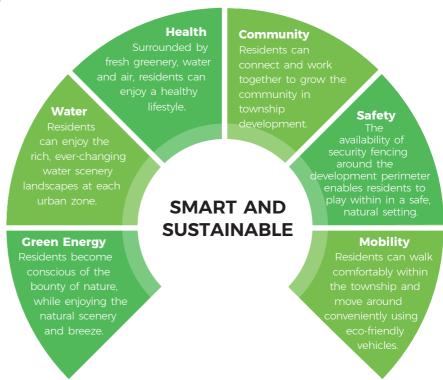
#### SUSTAINABILITY STATEMENT

#### **SUSTAINABLE + SMART DEVELOPMENT**

An internal taskforce - Technical Excellence Committee ("TEC") - comprising key personnel and representatives from each project, was formed to drive Sustainable + Smart Development ("SSD"), a subset of the Setia Digital Transformative Initiative, across the Group.

The TEC is responsible for reviewing and enhancing the project's technical requirements by conducting various research and development on new technologies, both within the local and global context, to understand the latest sustainable and smart innovations in the property construction and project development industry.

There are six (6) pillars under the SSD Framework, integrating both the sustainable and smart concept i.e. green energy, water, health, community, safety, and mobility.



Guided by the six (6) pillars above, TEC has identified 11 key topics and various initiatives under each topic.

#### **SUSTAINABIITY**



#### **SMART**



Key processes binding all SSD initiatives are site planning and master layout planning. As compared to the conventional approach in the design planning processes, sustainability planning process includes the involvement of the architect, engineer, landscape artist and town planner at all stages during the design phase. At times, an economist is also required to assess the viability of the project and surrounding areas.

Sustainable site planning is crucial and integral to S P Setia Group as it minimises impact on the environment and preserves the site's ecology and biodiversity. Some projects are inherently more material as they are situated within areas that are sensitive to the local ecology and biodiversity such as Kota Bayuemas which is located within floodplains, Setia Eco Glades within wetlands and Setia Eco Templer within an environmentally-sensitive area. Each and every project is designed to bring out the best of its existing features while at the same time, conserve energy and optimise resources.

Another key initiative carried out involved improving overall site mobility and connectivity. This was done by having a green lung area, encouraging the use of non-motorised transportation given the availability of properly demarcated bicycle lanes with secured parking, providing access to dedicated footpaths, vehicular lanes as well as a seamless public transportation system.

At S P Setia, we build spaces not only for people, but also for nature. We do this by using native species for landscaping, designing and placing landscape areas to receive better and efficient runoff, capture rainwater as well as filter and clean storm water. Open spaces, namely green and public spaces, have been thoughtfully designed to enable our communities to not only socialise but also create and sustain high quality of community value. This is evident with our Adventure Park located within Setia EcoHill 2 which garnered the Gold Award at The EdgeProp Malaysia's Best Managed Property Awards 2020.

Other initiatives include having a universal design to cater to the ageing population as well as younger generation, maximising site density, land utilisation and storm water management (from streets, swales and conveyance furrows), all of which will be taken into consideration during the site planning phase of each new project.

#### **MEMBERSHIP IN ASSOCIATIONS**

	Organisation	S P Setia Berhad Representation			
PROPERTY	Real Estate Housing Developer Association ("REHDA")	<ul><li>&gt;</li><li>&gt;</li></ul>	Setia EcoHill Setia Trio Setia Putrajaya Development (Niche Development)	<b>&gt; &gt; &gt;</b>	Setia Alam Impian Property North Island Setia Precast
	International Real Estate Federation ("FIABCI")	<b>&gt;</b>	S P Setia Berhad (Vice-President)	<b>&gt;</b>	Property North Island
	Malaysian Developers Council of Australia ("MDCA")	<b>&gt;</b>	Setia International Australia (President)		
	Sabah Housing And Real Estate Developers Association ("SHAREDA")	<b>&gt;</b>	Aeropod		
CONSTRUCTION	Master Builders Association Malaysia ("MBAM")	<b>&gt;</b>	Setia Precast	<b>&gt;</b>	Setia Wood
	Construction Industry Development Board ("CIDB")	<b>&gt;</b>	Setia Wood		
	Malaysian Timber Council ("MTC")	<b>&gt;</b>	Setia Wood		
	Malaysian Wood Moulding & Joinery Council ("MWMJC")	<b>&gt;</b>	Setia Wood		
COMMERCIAL	Malaysian Association of Convention and Exhibition Organisers and Suppliers ("MACEOS")	<b>&gt;</b>	Setia City Convention Centre	<b>&gt;</b>	Setia SPICE Convention Centre
	Malaysian International Chamber of Commerce & Industry ("MICCI")	<b>&gt;</b>	Aeropod		
	Malaysia Retail Chain Association ("MRCA")	<b>&gt;</b>	Setia EcoHill		
CORPORATE	Association of Certified Integrity Officers Malaysia ("ACeIO")	<b>&gt;</b>	S P Setia Berhad's Integrity & Governance Unit		
	Malaysian Association of Risk & Insurance Management ("MARIM")	<b>&gt;</b>	S P Setia Berhad		



As a leading property developer in Malaysia, S P Setia Berhad ensures sustainability by creating economic value from all our developments and maintaining a track record of delivering products of exceptional quality.



# **ECONOMIC**

#### A. ECONOMIC PERFORMANCE

2020 was a turbulent year for the Group in terms of our economic performance. The unprecedented COVID-19 pandemic resulted in a softer property market and no industry was spared. Our focus shifted to our employees, workers and community members, encouraging them to stay healthy and survive this pandemic, which had caught most of us off-guard. Notwithstanding, investments and donations were made to support the economic and social well-being of our stakeholders. For further details, kindly refer to COVID-19 Response section from pages 146 to 150.

We were able to soldier on through these hard times financially with our cost optimisation initiatives, deferring non-critical capital investment and stringent monitoring on our operating expenses. We took care of the well-being of our employees through regular engagement, built team spirit and continued to deliver our best while supporting our investors and shareholders. Weekly update meetings were carried out across all Business Units, including the Finance Department, to allow the Group to quickly react to any potential adverse situations. At the same time, financial performance, budgets and forecasts were closely monitored.

For further details on our financial performance and outlook, kindly refer to Management Discussion and Analysis section from pages 35 to 81 and Financial Statements from pages 197 to 339.

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#### **B. INDIRECT ECONOMIC IMPACTS**

As the leading Malaysian property developer that focuses on place-making, embedded with our **livelearnworkplay** philosophy, our projects are designed to reinvent existing places with the community at heart – to connect people, and improve the economic, social and healthy well-being of the community.

#### Infrastructure investments

The Group continues to enhance the living quality of the local communities by upgrading the surrounding infrastructure and amenities, embedding sustainability elements where possible. We completed infrastructure projects worth approximately RM88.44 million during the year, mainly relating to upgrades in landscaping works, drainage and sewage, maintenance of road works, construction of recreational parks, including a clubhouse for residents and surrounding communities.



#### **KL Eco City**

KL Eco City ("KLEC"), Malaysia's first green mixed development located in the country's largest urban area – Kuala Lumpur, stands out as a new commercial and retail space that has redefined the workplace and lifestyle concept. It combines diversity of use with leading sustainable principles to create an authentic, complex yet enriching city district.

During the year, KLEC won the Gold Award at the FIABCI World Prix d'Excellence 2020 Awards in the Office category, making it the developer's 12<sup>th</sup> FIABCI World Gold award. This win also makes S P Setia Berhad the only property developer in Malaysia to achieve this feat. KLEC's Vogue Suites 1 tower was also awarded the Malaysia Landscape Architecture Awards - Honour, in the Landscape Development Award category. Each of the office towers were also awarded with at least one green certification, including GBI Gold certification, LEED Core and Shell Gold certification.





The project encompasses five (5) office towers and a luxury residential tower built amidst a shared retail space, creating various job opportunities and at the same time, elevating the local economy of the surrounding area. as companies and businesses moved their offices to KLEC. The diverse tenant mix includes co-working spaces, multi-national companies, tech start-ups and more, adding commercial currency and vibrancy to the area. Each office tower is equipped with fibre optic backbone for high speed internet connectivity, high speed lifts with Destination Control System, and a 24-hour security system with CCTVs to improve work productivity as well as ensure the safety of our tenants.

Embracing one of the principles of place-making, i.e. accessibility and connectivity, the project not only houses the KL Eco City KTM commuter station but is also located adjacent to the Abdullah Hukum LRT station. The development of this integrated rail hub, costing approximately RM29.34 million, serves to connect the public to KLEC and Mid Valley City, providing for both work and leisure travel needs.

The project was built with a unique internal two-tier road system, as well as six (6) dedicated access points to five (5) major road networks, costing approximately RM195.71 million. Improved the accessibility for residents of Kampung Haji Abdullah Hukum via road connectivity, including a direct link to Lingkaran Syed Putra (to Petaling Jaya), Federal Highway (to City Centre), Jalan Bangsar and Jalan Pantai Bahru (to Bangsar).

Located adjacent to KLEC is the Pantai River, which is made-up of natural waterways and earth streams covered with vegetation, that was not properly lined. This resulted in the overflow from low-lying site areas during heavy downpours, thus affecting the surrounding local community. To mitigate this, an L-shaped drain was constructed to replace the river, following the already lined section of Pantai River, just upstream of the project site during project development. In doing so, we prevented future erosion and flooding, keeping the development and surrounding area safe.

#### **EcoHill Walk**

Ecohill Walk, located in Setia EcoHill, is an exciting integrated mixed development located at the Kajang-Semenyih Corridor. Featuring a lifestyle shopping mall complex, 16 units of retail shops and 80 blocks of office spaces, it serves the 600,000 population from several major townships, all within a 20-minute drive radius from the project.

EcoHill Walk is targeted for completion by 2021. It will benefit the surrounding neighbourhood area, provide convenience, create more job opportunities and add vibrancy to the communities in the vicinity. Link bridges will also be constructed to extend the convenience of reach between the existing service apartments, neighbourhood mall and commercial retail shops, thus providing a safe and secure environment for residents and communities around Ecohill Walk.

#### C. ANTI-CORRUPTION

Ethics, honesty, and integrity are cornerstones of our approach in doing business. S P Setia Group is committed to upholding the highest ethical standards in our workplace, across all business dealings and relationships wherever we operate.

We have established and enhanced the relevant policies which are aligned to the Group's Code of Conduct and Business Ethics. These policies act as a guide to our employees and business associates in dealings with bribery and corruption situations within and outside the company. While the Anti-Bribery and Corruption Policy clearly states that the Group adopts zero tolerance towards bribery and corruption, the Group has taken necessary steps to identify various corruption risks across our operations and value chain, along with the planning and implementation of adequate mitigation measures.

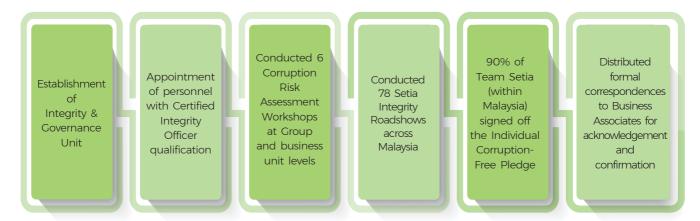
These policies and the related Standard Operating Procedures have been uploaded onto the intranet for Team Setia's references. As per the Bursa Securities' listing requirements, the policies are also made available to the public on the Group's website, accessible at <a href="https://www.spsetia.com/en-us/corporate-governance/corporate-governance-home">https://www.spsetia.com/en-us/corporate-governance-home</a>







#### **Initiatives Taken in 2020**



To further strengthen the implementation of anti-bribery and corruption practices, we established the Integrity & Governance Unit ("IGU"), and appointed a qualified Certified Integrity Officer ("CeiO") to oversee and monitor the effectiveness of the IGU function. For further details, please refer to "Statement on Risk Management and Internal Controls" section on pages 130 to 139.

40 Integrity Governance Champions ("IGC") were appointed, consisting five (5) Executives/Senior Executives, two (2) Assistant Managers, 11 Managers and 22 Senior Managers to assist the IGU on all integrity and governance matters, including corporate liability, at the respective business and support units. This includes monitoring relevant reporting as well as implementing the Anti-Bribery and Corruption policies and procedures. These individuals also ensured the scheduled training/briefing sessions were successfully carried out to meet its objectives, in addition to facilitating the collation of relevant data and information, as and when required.

Overview

#### SUSTAINABILITY STATEMENT

In 2020, we conducted six (6) corruption risk assessment workshops at both the Group and business unit levels. Despite the various MCO phases, the IGU successfully held 78 Setia Integrity Roadshows designed to raise awareness on corporate business ethics and integrity. These awareness sessions, held with Team Setia via physical and virtual communication platforms, successfully reached out to 90% of Team Setia (within Malaysia), who also signed the Individual Corruption-Free Pledge.

Moving forward, we will continue to conduct business ethics and integrity awareness sessions to the remaining Business Units. We will also extend these sessions to our Business Associates as well.



Stakeholders were encouraged to report any breaches in ethical conduct via the Group's approved Whistleblowing channels such as the Whistleblowing e-form which can be found at the Group's official website, dedicated hotline number at 603-33482719, direct email to the Chairman of RMC at apardas@spsetia.com or IGU at igu@spsetia.com, or walk-in/appointment with Chairman of RMC or IGU.

The report of breaches in ethical conduct shall be processed according to the Group's Whistleblowing Policy as shown below:





Environmental responsibility is vital to S P Setia Berhad's commitment to sustainable development. We track and monitor our impact on the environment through a combination of initiatives. From energy efficiency initiatives to flood and waste management, we strive to create world-class sustainable developments that leave a positive impact on society and the environment.



# **ENVIRONMENTAL**

#### Setia Warisan Tropika

Provisional Green Building Index Certification -Clubhouse 2020

## SPICE Convention Centre

GBI Certified – Non-Residential New Construction 2017 – 2020

#### KL Eco City Office Tower 3

GBI Gold – Non-Residential New Construction 2015

#### KL Eco City Office Tower 2 (Mercu 2)

GBI Silver -Non-Residential New Construction 2020 - 2023

#### S P Setia Corporate <u>Hea</u>dquarters

GBI Platinum Completion &
Verification

#### Setia City Convention Centre

GBI Certified -Non-Residential New Construction

#### KL Eco City Sales Gallery

GBI Gold -Non-Residential New Construction 2012 - 2015

#### **Setia City Mall**

GBI Silver -Non-Residential New Construction 2015 - 2018, 2018 - 2021

#### KL Eco City (Retail)

GBI Certified -Non-Residential New Construction 2015 - 2018 S P Setia Group's branding is synonymous with being the leader in environmental-friendly property development projects. Our development philosophy is to embed sustainability and smart features across all our projects. This has led to the establishment of the SSD taskforce, with the objective of continuously improving and enhancing project features to cater to our customers.

Our achievements throughout the years is reflective with the receipt of various accolades and recognitions issued by both local and international bodies. Please refer to page 18 for a full list of accolades and recognitions won throughout 2020.

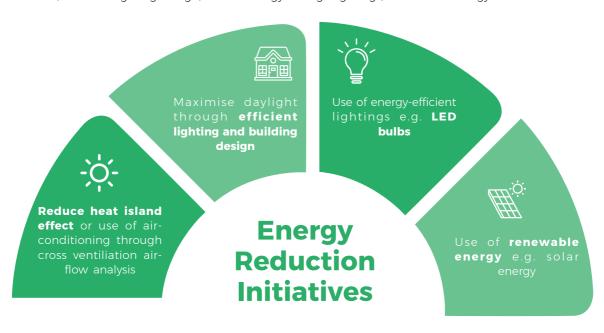
Among our belt of green certifications include our S P Setia Corporate Headquarters as the first privately-owned office and third building in Malaysia to be certified GBI Platinum as well as GreenRE Platinum. Within the same vicinity, our Setia City Convention Centre was the first GBI-certified Convention Centre.

#### A. NATURAL RESOURCES

#### i. Energy Efficiency

We recognise the importance of energy savings as electricity is used throughout our projects to power electronics and machineries for productivity purposes. It is also used to light up the area, be it for key attractions or security purposes.

Among the energy reduction initiatives which were implemented across our projects include the reduction of heat island effect, efficient lighting design, use of energy savings lightings, renewable energy and more.



To reduce heat island effect, analysis of cross ventilation air-flow was conducted throughout the project development phase to identify and mitigate stagnant hotspots. This was made possible with the assistance of computer simulation through building and landscape modelling. Building orientations were optimised to minimise indoor heat gain, thus, reducing the need for the use of air-conditioners and other cooling equipment.

Efficient lighting design was also considered during the project design to enable more daylight into buildings. This was carried out based on sun path analysis through passive design. High-performance double-glazed windows and louvres were used, not only to reduce heat gain, but to also encourage the use of natural daylight to illuminate the buildings.

Throughout the Group, we installed energy-efficient lightings such as LED lightings, among the many initiatives, to reduce electricity consumption in most of our projects. During the year, additional LED lightings were either installed or replaced throughout our project developments, including Setia Eco Templer, Setia Eco Hill, Setia Eco Park, Setia Alam Impian, Setia Warisan Tropika, Setia International Vietnam, Setia International Australia and Setia City Convention Centre.

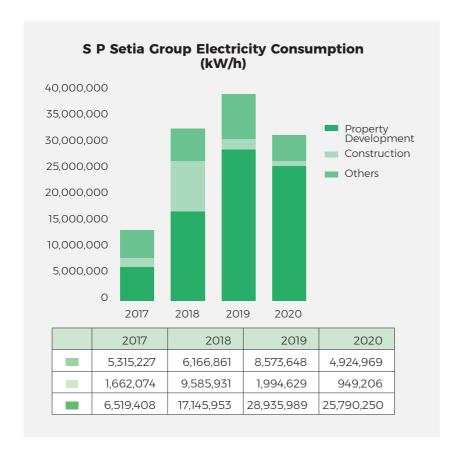
We strive to reduce carbon emissions by promoting the use of renewable energy such as solar energy.

The world's first solar-powered hybrid F&B hub, D'Network in Setia Eco Park, Setia Alam was launched in September 2020. D'Network is a realisation of S P Setia's vision to build a green and sustainable hub that effectively runs on solar power, which generates electricity to be used for lighting, ventilation, air conditioners, irrigation systems, etc. Spanning across 3.16 acres of land, the F&B hub is powered by 345kWp of hybrid solar energy, complementing the supply from traditional electricity grids.

The venue also houses the world's first solar musical fountain. Known as the Symphony of Sustainability, the fountain charges up during the day using solar power to illuminate through the night with lights, water dancing and melodious tunes.



To manage the heightened concerns surrounding the pandemic, the Group in collaboration with Panasonic, took further steps to fully-equip the F&B Hub with the latter's patented air purification device, powered 24-hours a day by solar energy. The technology - the first of its kind in Malaysia - works by collecting invisible moisture in the air and applies high voltage to it, to produce "hydroxyl radicals contained in water", which amongst others inhibits pathogenic microorganisms (bacteria, fungi, and viruses) and allergens. In other words, effectively neutralising viruses that are mostly found on fabric and surfaces to produce better, safer air quality for workers and patrons.



#### **Electricity Consumption and Intensity Ratio**

As a result of the various lockdowns that occurred globally (especially Malaysia's MCO), S P Setia Group managed to reduce its electricity and water consumption in 2020 as compared to previous years.

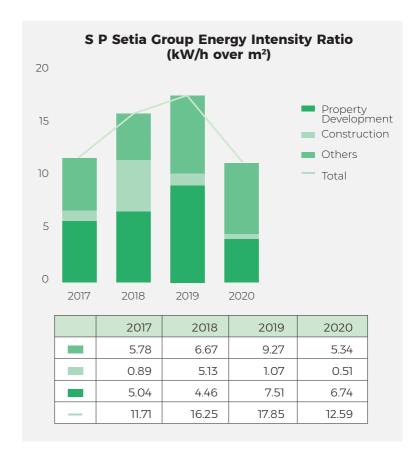
The graph on the left shows the Group's electricity consumption from 2017 to 2020. The electricity consumption data includes estimations for the months of November and/or December 2020 for Setia EcoHill, Setia Seraya, Setia Bukit Indah, Setia International Australia, Setia Precast and Setia City Convention Centre.

Electricity consumption data from 2017 to 2019 were updated to include two (2) additional projects under the Property Development segment, namely Setia Trio and Setia Eco Cascadia; adjustment on Others segment; and inclusion of 2019 actual data for Property Development segment and Others segment which were not available in FY2019.

The Group consumed a total 31.6 million kW/h of electricity in 2020, a 20% reduction in electricity consumption as compared to 2019 which was 39.5 million kW/h.

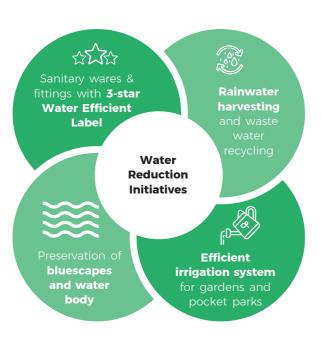
Based on segments, the Property Development's electricity consumption in 2020 decreased by 11%, despite additional electricity consumption experienced at Setia Warisan Tropika's new Welcome Centre. This Welcome Centre was completed and began operations this year. Similarly, the Construction and Others segments also recorded a significant decrease in electricity consumption from 2019 to 2020, that is 52% and 43% respectively.

In line with GRI 302-3: Energy Intensity, the Group has determined the space size m² as the organisation specific metric (the denominator) to calculate the energy intensity ratio. The graph on the right represents the result of energy intensity ratio analysis from 2017 to 2020.



All segments across the Group, namely Property Development, Construction and Others, experienced a decrease in its energy intensity ratio as compared to 2019, in line with the Group's overall reduction in energy consumption.

The Property Development segment registered 6.7 kW/h per m², a 10% decline in its energy intensity ratio as compared to the previous year. Meanwhile, the energy intensity ratio for the Construction segment stood at 0.51 kW/h per m² and Others recorded 5.34 kW/h per m², both segments successfully lowering their energy intensity ratio by 52% and 42% respectively, as compared to the previous year.



#### ii. Water Efficiency

Based on statistics from the National Water Services Commission ("SPAN"), Malaysians consume an average of 201 litres of water per person per day, which is equivalent to 134 bottles (1.5-litre capacity each).

Most of our projects were equipped with sanitary wares and fittings with a 3-star Water Efficient Product Labelling Scheme ("WEPLS") by SPAN. Toilets consumed the largest amount of water in any home, using about 30% of the household's water. As such, dual flush toilets were provided in our projects to encourage our house buyers and commercial users to lessen their water usage.

Rainwater harvesting systems were implemented in a few of our projects, including Setia Eco Glades, Setia Alamsari, Setia Alam Impian, Setia Fontaines and both at our Setia City Convention Centre and SPICE. Rainwater was collected and channelled via a rainwater downpipe and stored in a concealed tank within the building compound. This can be reused for outdoor purposes, such as watering plants, indirectly helping reduce water consumption.

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Having many gardens and pocket parks in our projects, efficient irrigation system for our greenscapes is critical not only to the environment, but also to optimise maintenance costs. The Group is looking into upgrading our irrigation system to include more soaker hoses, a drip irrigation system that releases water slowly and directly onto the plant's roots, at more of our project's gardens and pocket parks. This system helps to reduce runoff and evaporation. As it can also be set to a timer, for example, to water plants after dark, making this a good way to minimise evaporation.

Bluescapes or water body were incorporated into our projects, mainly our Eco-series projects, to promote biodiversity and improve the ecosystem within the project area. For example, ponds and lakes were created to not only store water, but also serves as a cooling agent for the overall development and provides water to flora and fauna. The natural waterfall located at our projects increases water circulation and contact with oxygen, thus ensuring a conducive living environment for the fishes. It also serves to reduce water evaporation and preserve nature.



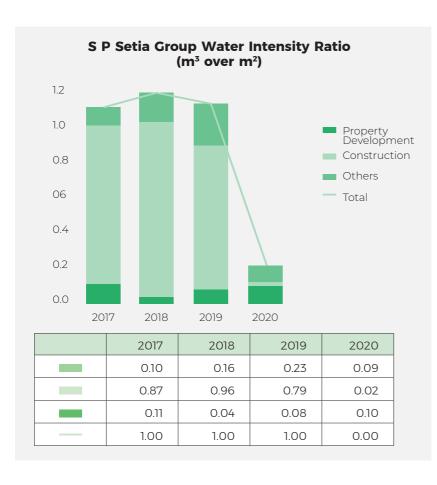
#### **S P Setia Group Water Consumption** 1,200,000 1,000,000 Property Development Construction 800,000 Others 600,000 400,000 200,000 0 2017 2018 2019 2020 2017 2018 2020 2019 95,885 130,415 131,625 85,967 1,308 1,437 1,186 34,408 141,145 162,550 310,834 358,196

#### Water Consumption Intensity Ratio

The following chart represents the water consumption of the Group from 2017 to 2020. The water consumption data also includes estimates for November and/or December 2020 for Setia EcoHill, Setia Seraya, Setia Eco Glade, Setia Eco Cascadia, Setia Tropika, Setia Precast and Setia City Convention Centre.

Similar to the adjustments made for electricity consumption, water consumption data for 2017 to 2019 were updated to include two (2) additional projects under the Property Development segment, namely Setia Trio and Setia Eco Cascadia; adjustment on Others segment; and inclusion of 2019 actual data for Property Development segment and Others segment which were not available in FY2019. In addition, we discovered material discrepancies in the water consumption data from 2017 to 2019 which affected the data disclosed for the Property Development segment. Accordingly, we have recomputed and adjusted for the discrepancies in this year's disclosure, resulting in a downward variance of 65% (2017), 67% (2018) and 57% (2019) respectively, or an average of 63% for the three-year period, as compared to the amount disclosed in 2019.

The water consumption by the Group increased by 8%, as compared to the previous year, from 0.44 million m³ to 0.48 million m³. Based on segments, the Property Development segment experienced a 15% growth in water consumption, rising from 0.31 million m³ to 0.36 million m³ due to increase in Club Memberships and tenants for Setia Eco Templer and Setia EcoHill, maintenance for Setia Eco Garden and Setia EcoHill, Setia Warisan Tropika's new Welcome Centre and Setia Fontaines's new Setia Experience Centre.



Meanwhile, there was a stark upsurge in water consumption for the Construction segment, rising from 0.001 million m³ to 0.034 million m³ as water consumption data for the Setia Precast project site was included for the first time in 2020. Previously, data from 2017 to 2019 was not recorded.

Water consumption for the Others segment lessened significantly by 35%, from 0.13 million m³ to 0.09 million m³ as a result of the various MCOs phases in 2020 where our convention centres halted operations during this period.

Further analysis on our water intensity ratio showed tremendous reduction in total water consumption (m³) for every floor area (m²). When broken into segments, water consumption for every floor area for the Property Development segment recorded an increase of 0.22% in 2020, growing from 0.08m³/m² in the previous year to 0.10 m³/m² in 2020. Nevertheless, the Construction segment recorded 0.02 m³/m² and Others segment 0.09 m³/m², a significant reduction of 98% and 60% respectively.

#### **B. BIODIVERSITY**

Setia EcoHill 2's Adventure Park, located at the highest point of the project in Semenyih, garnered the Gold Award for The EdgeProp-ILAM Malaysia's Sustainable Landscape Award 2020 at the EdgeProp Malaysia's Best Managed and Sustainable Property Awards 2020.

The area was formerly an oil palm and rubber estate which was revitalised into Malaysia's first residential mountain biking park amidst nature. It was developed by utilising and navigating through the existing vegetation and terrain, with more than 90% of the original landscape preserved. Sustainability and environmentally-friendly principles were also applied throughout the entire development process to reduce our impact to the environment. This posed a few challenges, such as allowing only small machineries to enter the site to avoid destroying the plants.

Cognisant on the importance of sustaining our forest systems, the existing forest at the Adventure Park was regenerated by infusing biodiversity elements to create a new healthy ecosystem. For example, fruit trees and nectar plants were planted to attract insects, butterflies, birds and animals back to the area as this served as natural biological pest control. Natural irrigation systems for the forest also largely reduced maintenance costs.



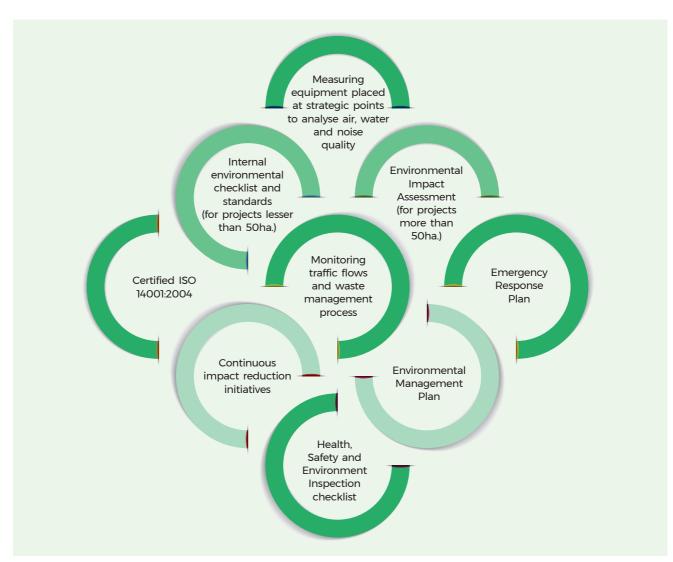
The "park on the hill" doubles up as a space for active social interactions, with residents and visitors flocking the area for jungle trekking, bird watching, and quality outdoor family time. It provides a blend of adventure for those who enjoy nature, with its facilities such as obstacle courses, forest playground, par-course and a vertical climbing wall within the park. Residents and visitors would also be able to reconnect, while enjoying the serenity of nature at the butterfly lawn and fern garden. Alternatively, they could also take a stroll along the Park's Canopy Walk.

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#### C. ENVIRONMENTAL COMPLIANCE

Despite the various MCOs phases that restricted employees from entering their workplace, the Group's environmental compliance monitoring and audit processes were carried out as usual. The Group continued to monitor and audit our contractors on a bi-weekly basis, focusing on construction waste management, noise pollution, air pollution and effluent management.

Various activities and processes were carried out to ensure adherence to regulations and guidelines issued by the Department of Environment's ("DOE"). This includes:



On a regular basis, impact reduction initiatives such as the installation of water sprays to reduce air pollution at project sites; erection of sound barriers and use of mufflers for machinery to reduce noise pollution; and building on-site toilets equipped with septic tanks to prevent water pollution, amongst others, were implemented. These efforts were carried out to reduce environmental impact as well as boost the health of our workers.

The Group did not violate any environmental laws and regulations and has not been penalised or fined for any major environmental violation in financial year ended 31 December 2020.

The Group regularly reviews any risks and potential issues related to the environment for its operations. Actions and steps were taken to ensure relevant environmental factors remained within the regulatory requirements of our operations. This included reviewing and monitoring relevant environmental parameters at all our project sites, both in-progress and completed.

Overview

### SUSTAINABILITY STATEMENT



S P Setia Berhad acknowledges the social influences of its operations and activities on its employees, customers and local communities. We believe in improving the lives of local communities by creating opportunities for education, health and overall well-being. We strive to provide our employees with an environment that presents professional challenges, encourages innovation and creativity, and rewards success and effective teamwork.



#### A. EMPLOYMENT

#### i. Diversity and Inclusion

We acknowledge that a diverse and inclusive workplace provides an environment for increased productivity and collaboration among Team Setia. Over the years, we continued to plan and carry out various programmes and initiatives to strengthen diversity and inclusion.

Women of Inspiration@Setia or better known as WIN is an initiative by the Setia Women's Network that recognises gender diversity and inclusion as its main goal, providing a support system that encourages the women of Setia to follow their career aspirations. In 2020, our activities and programmes such as Virtual WIN Circle, Intimate Virtual WIN Circle, Virtual Workout Session and Project Humans of Setia, were conducted virtually.

**Project Humans of Setia.** Photoblog inspired by the famous Humans of New York

#### Virtual WIN Circles.

Open to both male and female employees, with interesting themes such as "Stay Home Stay Healthy Stay Setia", "Show & Tell (Team Setia Junior Edition)" and "Pets of Team Setia!"

Intimate Virtual WIN Circle. Limited to 30 participants for each session with meaningful themes i.e., "Imperfect is Perfect" and "We Better than Me"

Virtual Workout Session. Hosted by our own Team Setia. Enjoyable and interesting work out i.e., Dynamic Tabata and Fat Burning Project Humans of Setia is a great platform that was launched prior to the MCO, with the objective of supporting our Team Setia to appreciate each other's strengths and uniqueness. Inspired by the famous Humans of New York, this photoblog provided our people with a platform to share stories on their journey as individuals of Team Setia, including demonstrating positive qualities in terms of leadership, engagement and inclusivity.



Bryant Ong Hock Choon Setia Pearl Island

### Moving into an Unknown Territory

Prior to joining SP Setia, I worked in the banking industry selling financial products. I used to be a "Lone Ranger" as I hardly work in a team or with anyone. It was all about chasing sales figure, competing with each other for commissions and incentives. It was tiring and just not fulfilling.

However, I was blessed and grateful for one of my friends shared a job vacancy with me. It was a role in the Customer Relations and Property Management department in Setia. It was completely new role, different from what I was currently doing at that time. It was something unfamiliar, yet I did not think twice, immediately I handed in my resume. I got the job; at that point in time, my life changed.

I was never able to truly appreciate the word- TEAMWORK until I joined Setta. In Setta, I learned the true meaning of 'live - learn - work - play. Where work-life balance matters; it's all about how do we help each other and together make it better; the constant sharing of ideas and taking advice from each other. Through this new journey, I discovered true friendship and the bond of a family called TEAM SETIA.

Each night as I fall asleep, I reflect and be thankful for that decision i made to dive into an unknown territory; for this journey has led me to grow and be a better man today.



Nor Azaziah Ahmad Setia Eco Park

## My Growth with Team Setia

I started my journey in Setia as a Sales and Marketing Executive at Setia Sky Residence, back in September 2007.

I am blessed to have good leaders throughout my journey in Setia, especially those who have mentored me in my career. Back then, I was selected as a High Fiyer, and therefore, I had the opportunity to travel to Kuching, Miri, Kota Kinabalu, Medan, Melbourne, Oatar and London for work.

I enjoy my work, even though I have to travel daily from Setia Alam to KL for eight years. In 2016, I decided to request for transfer to Setia Eco Park as my children started schooling, and this would allow me to spend more time with my family as I was then pregnant with my 4th child. I am thankful to have a supportive husband and mother who helps to share the load of taking care of our five children.

The support given by my superior has also assured me as I juggle between family and work responsibility. Sometimes, I have to bring my children to work on weekends, and my bosses are understanding to allow for such arrangements.

S P Setia has a unique culture of employee dance performances, and one of my best memories is performing for annual dinner, charity dinner and an exclusive event for property purchasers, with the theme of Back Street versus Phantom of the Opera.

I am happy with what I am doing now, as there are always opportunities for growth and to handle new tasks. I was managing high-rise project, and the switch to township project allows me to learn different set of skills.

Lastly, I would like to humbly share that to be successful in anything is never easy – it requires hard work, sacrifice, support system, determination and discipline.

Setia



Naluri Virtual Workout: Dance to fit!



Virtual WIN Circle with Team Setia

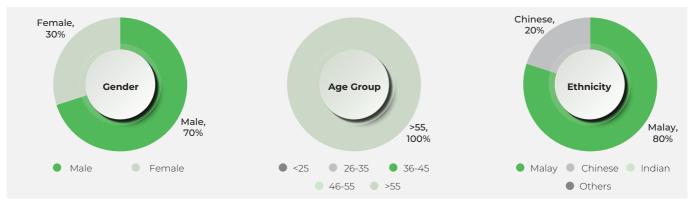
Our Virtual WIN Circles programme is one of the many platforms where small groups of Team Setia would come together to champion peer support, learning and growing together. Opened to both male and female employees, the programme attracted more than 100 participants from Team Setia. It is essentially a platform that encouraged employees to strengthen and reinforce relationships among Team Setia members. Weekly Virtual WIN Circles get-togethers were carried out via Microsoft Team with different themes introduced, including "Stay Home Stay Healthy Stay Setia", "Show & Tell (Team Setia Junior Edition)" and "Pets of Team Setia!"

Intimate Virtual WIN Circle was an additional programme created to encourage and motivate women to strive towards continuous progress, instead of perfection. Participants also learnt the importance of embracing diversity in relationships while maintaining their individuality, truthfulness, openness and vulnerability in all interactions. Opened to a maximum of 30 participants for every session, each session had different themes such as "Imperfect is Perfect" and "WE Better than ME".

In addition, we managed to conduct weekly Virtual sessions, hosted by our very own Team Setia, in collaboration with Virtual WIN Circles and Setia Sports and Recreational Club ("SSRC"). Regular work-out sessions included Dynamic Tabata and Fat Burning.

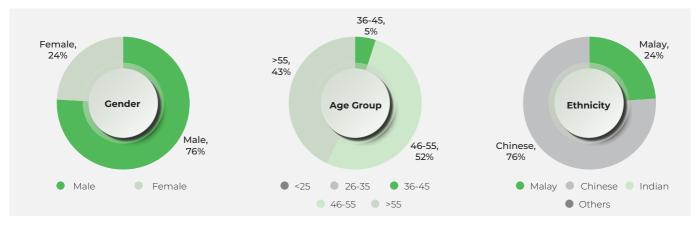
During the year, the Board of Directors' profile (based on gender, age and ethnicity) remained unchanged from 2019. Meanwhile, the profiles of those from senior management, employees and new hires showed slight changes from 2019 to 2020.

#### **Board of Directors Profile**



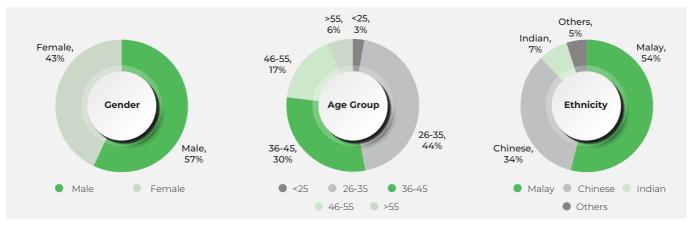
#### **Senior Management Profile**

There were slight changes in the Senior Management Profile (by gender, age group and ethnicity) for 2020 as compared to 2019. During the year, the female to male employee ratio decreased to 24:76 (2019 - 30:70). In terms of ethnicity, the Senior Management profile in 2020 stood at 24% for Malay (2019 - 25%), 74% for Chinese (2019 - 73%) and 0% for Indian (2019 - 2%).



#### **Employees Profile**

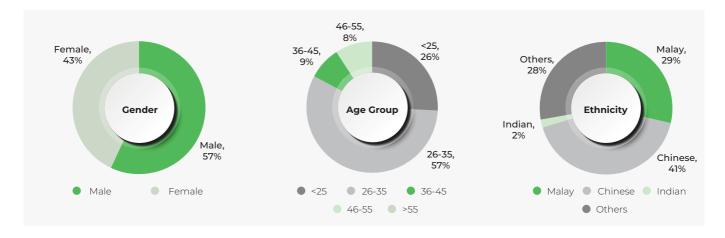
In 2020, the female to male employee ratio remained at 43:57 (2019 - 43:57). Similarly, employee ethnicity in 2020 remained almost the same as the previous year, 54% for Malay (2019 - 54%), 34% for Chinese (2019 - 35%), 7% for Indians (2019 - 7%) and 5% for Others (2019 - 4%).



On a global scale, the pandemic caused many companies to downsize their operations by reducing the number of employees. However, our employee turnover rate remained within the single digit range for 2020.

#### **New Hires Profile**

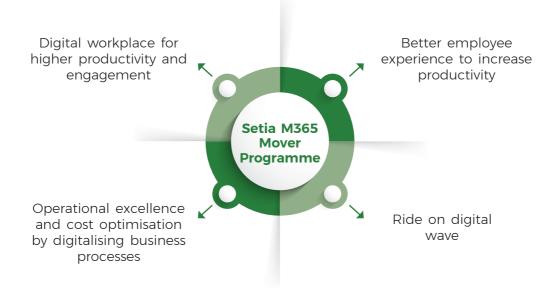
During the year, the female to male new hires ratio remained at 43.57 (2019 - 43.57). In terms of the ethnicity of new hires, 2020 registered 29% for Malays (2019 - 43%), 41% for Chinese (2019 - 45%), 2% for Indians (2019 - 6%) and 28% for Others (2019 - 7%).



#### ii. Workplace and Employee Benefits

In response to the COVID-19 pandemic, the nation-wide preventive measures that resulted in the declaration of various MCO phases saw the creation of a new work culture for us. Working from home emerged as a new normal and for us at S P Setia, we were well-positioned to leverage on this as the Group had embarked on our Digital Transformation Programme since 2019. For more information, please refer to Digital Transformation section from pages 160 to 161.

The Setia M365 Mover programme is one of the many initiatives under our Digital Transformation Programme. Under this initiative, champions for respective Business Units were appointed as the go-to-person to grow and sustain the Microsoft 365 roll-out, spreading awareness and helping their peers adapt to this new way of working. Themed "Work Anytime, Anywhere on the Device", this programme uses Microsoft Office 365 Pro Plus which enabled a multitude of deliverables including video/voice conference for all employees, file collaborations with internal and external parties via Microsoft Teams and Cloud Storage (One Drive), leading to the creation of a more productive workforce. This programme not only improved employee productivity and engagement, but also reduced manpower used to manage email systems and office upgrades.



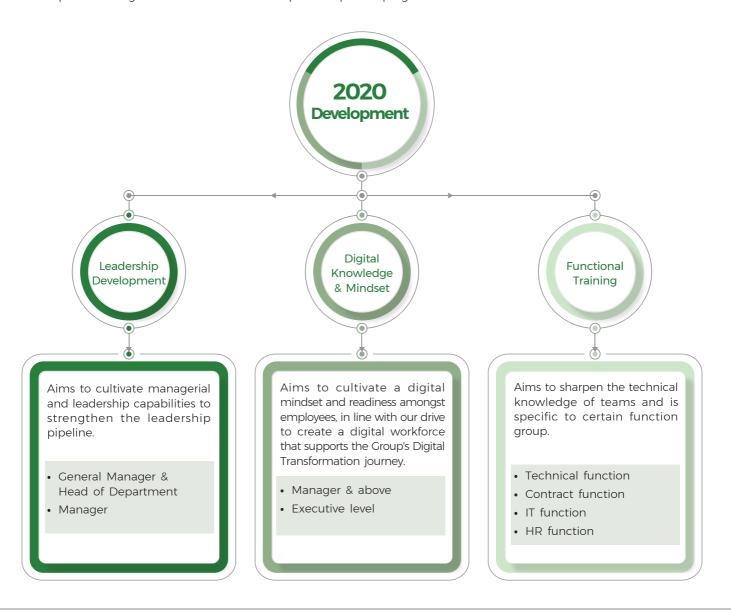
Despite the restrictions placed, we continued to provide benefits to our employees such as annual leave, special leave (such as paternity, study and marriage leave) and monthly meal allowance. Employee Share Option Scheme ("ESOS") and Employee's Share Grant Plan ("ESGP") were also provided at the discretion of the Board as governed by the By-Laws of the Group's Long-Term Incentive Plan ("LTIP"). Further information can be obtained from the Financial Statements on pages 197 to 339.

Our focus this year was on employee health. The Setia Pandemic Taskforce was established and various initiatives were implemented to reduce the risk of exposure to COVID-19. Some of these initiatives included the creation of the "Return to Work" guidebook, virtual roadshow sessions for all employees prior to returning to the office post-MCO, including the distribution of daily fabric masks and hand sanitisers to employees.

#### iii. Talent Development

Our people are an important asset to our company. In 2020, we continuously provided various platforms for our employees to enhance their skills and competencies. This year's talent development programmes focused mainly on three dimensions, namely Digital Knowledge & Mindset, Functional Competency and the Setia Leadership Pipeline.

Both the Digital Knowledge & Mindset and Functional Competency programmes were focused on creating a strong digital workforce with strong functional capabilities. At the same time, we continued to build our Setia Leadership Pipeline through the Structured Leadership Development programmes and initiatives.



In addition to the three (3) main talent development dimensions mentioned earlier, our employees were also able to advance their skills and competencies via other internal and external public programmes. This resulted in a total of 27,456.5 training hours for this year and an average of 12.7 training hours per employee.

The People Pulse Survey was conducted in 2020 to capture employee feedback, based on this year's engagement levels. Our overall employee engagement score for this year stood at 81% (2019 - 86%). The feedback obtained from the survey provided a platform for us to identify areas of improvement.



The inaugural Setia Leadership Re-imagined ("SLR") Network was launched this year to help "graduates" from our Setia Leadership Programme (Harvard Leadership, People4ward and PeopleXcellence) develop critical skills in order to be more efficient leaders in our company. It is a continuous learning platform that allows graduates to apply the skills gained throughout their careers, access to cross-learning through the sharing of best practices and at the same time, create a strong internal support system for the community.

The goal of SLR Network is to create a community of leaders who will then go on to nurture other potential leaders, simultaneously creating a common learning platform for continuous growth through thought leadership. In order to be part of SLR Network, graduates were required to complete their Individual Development Plan, register with Naluri's Digital Coaching Programme and identify two successors to be groomed.

Our ongoing training programme such as PeopleXcellence@Setia and PersonalXcellence@Setia continued to be carried out.



The former training programme is targeted at preparing new managers for transition to a managerial career by bringing a mind-set change and learning new skills to build a solid foundation in people management.

The PeopleXcellence@Setia Programme saw the participation of 21 employees. It was carried out across nine (9) days, covering topics such as building self-awareness, hiring, development, performance management and career progression.

Meanwhile, the latter is targeted to the high potential executives with the objective of developing future leaders through enhancing their personal effectiveness, and cultivate leadership behaviours and mindset in the early years of their career. The PersonalXcellence@ Setia Programme, which was carried out across a four-month period, saw the participation of 27 employees. Various sub-programmes were carried out to advance the competency skills which we found to be relevant to the participants, such as self-awareness, innovation and creativity, speaking and pitching, and leadership behaviour.

During the year, our first cohort consisting 50 participants completed the Harvard Leadership Direct series. The goal of this series was to expose our potential leaders to emerging leadership trends and challenges as this would help them support the Company's business strategy. Topics such as managing complexity with collaboration, thinking ahead of the curve, driving innovation, and change were carried out across the three (3) modules.

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#### SUSTAINABILITY STATEMENT

#### iv. Engagement Activities

Prior to MCO, we managed to conduct our annual Chinese New Year-themed luncheon. During the luncheon, fun games and live performances by Team Setia were held for our employees as well as local communities. The luncheon, which was held at the Setia City Convention Centre, was attended by employees from all Business Units across Malaysia, all dressed in their traditional Chinese attire. Prosperity-themed dishes were served much to the delight of everyone, accompanied by martial art performances and artwork that demonstrated the elements of a Chinese New Year celebration.



CEO/COO Dialogues were held, involving all employees, suppliers, contractors and business associates. The CEO/COO Dialogue, which is essentially a townhall session, was conducted to bring together employees across all levels as well as provide employees with the opportunity to get up close and personal with the leadership team. In January 2020, seven (7) CEO/COO Dialogue physical sessions were held across different locations i.e., Melbourne, Central Region, Setia Wood, Vietnam and Aeropod. These sessions were attended by approximately 90% of total employees. The second CEO/COO Dialogue session was held virtually in June 2020, attended by approximately 79% of total employees.

We are aware that the COVID-19 pandemic may have affected our employees' psychological health due to change in environment, especially in terms of their

personal life, workplace and risk of exposure to COVID-19. Cognisant of this, frequent and continuous engagement with employees were essential to keep them motivated, enhance their sense of well-being and productivity. During the year, various employee engagement activities such as weekly meetings and continuous communication via digital platforms such as email and WhatsApp were conducted.

Taking it a step further, the Good Morning Setia sessions were also conducted virtually every weekday. Good Morning Setia is a regular sharing and discussion session within Business Units/division teams that provides cross-learning opportunities, enhances communication and sharing among employees as well as improves employees' engagement. Apart from this, articles and information relating to updates relevant to the industry and business, as well as latest news pertaining to the Group and Company, were posted on this Intranet platform.

Another maiden programme launched in 2020 was Naluri - an Employee Assistance Programme aimed at improving mental health and employee engagement, especially during this pandemic period. We engaged Naluri, a digital therapeutics company, to provide COVID-19 support and ensure our employees were well taken care of, both physically and mentally. As of 30 November 2020, 34% of employees had subscribed to this programme.

Roadshow Clinics were conducted across three (3) regions, namely Central, North and South to heighten awareness on the existence of the Naluri - Employee Existence Programme among Team Setia members. These Roadshow Clinics were filled with various activities such as basic health screening, meet and greet session with the coaches, hands-on assistance for the installation of Naluri's application and 'live' demonstrations of the user journey. To help subscribers improve and maintain their overall well-being, the modules in the Naluri's App comprised of Multi-Disciplinary Professional Coaching, Health Curriculum Learning Modules, Thought Journal: Digital CBT, Food Journal, and Planner: Reminders and Activity Tracking.



Subscribers of this programme may enjoy a variety of activities including:

#### **Activities**

#### **Details**

Naluri Public Webinars



The COVID-19 Webinar Series, hosted by Naluri, was held at least twice a month, exclusive for Team Setia. The Webinar covered the following topics:

- Togetherness beyond social distancing (by Dr. Shawn Lee, Clinical Psychologist).
- Leading Remote Team during Turbulent times (by Azran Osman-Rani, Naluri Co-Founder and CEO).
- Financial Management during Critical Situations (by Fateen Rosli, Financial Planner).
- Stress Management and how to be productive during the COVID-19 Pandemic (by Goh Lei Kheng, Clinical Psychologist).
- Desk side exercises and stretching (by Tien Cin Yong, Certified Fitness Trainer).

Weekly Newsletter



Weekly Newsletters were sent out to Team Setia, providing useful tips on improving general well-being, such as:

- Tips on handling stress during pandemic.
- Tips on how to be productive during the month of Ramadhan.
- Tips on how to stay on track with our new norm.
- Tips on working from home.

Dedicated
Telephone
Helpline

A Naluri hotline was set-up exclusively for Team Setia. Employees were encouraged to contact the hotline for consultation with Naluri's psychologist and counsellors on matters pertaining to COVID-19, be it anxiety, stress or frustration, at the workplace or at home.

Video Therapy



Under Naluri, subscribers going through mental health pressure, were encouraged to attend consultation and therapy sessions with the qualified clinical psychologist identified. The therapy sessions were done via video conference or face-to-face session on-site.



Monthly Naluri Webinar for Setia employees

#### **B. OCCUPATIONAL HEALTH AND SAFETY**

#### **HSE Governance**

Health and safety are of paramount importance to S P Setia Berhad. It is our obligation and responsibility to implement comprehensive practices and measures to prevent accidental injuries and occupational-related illnesses from occuring to our employees, customers and the general public.

Our Heath, Safety and Environment ("HSE") standards is governed by the Health, Safety and Environment Policy, which is endorsed by our CEO. The HSE Policy was revised and updated during the year to reiterate the Group's commitment on health, safety and environment aspects.



S P Setia Berhad has a dedicated team, Group Safety Committee, to oversee all HSE matters at Group and business unit levels, monitor HSE performance and review the effectiveness of HSE policies and procedures. The Group Safety Committee is chaired by our COO and led by our Group Quality Management team and HSE representatives from the respective Business Units.

Occupational Health and Safety ("OHS") Committee at headquarters ("HQ") level leads the implementation of HSE initiatives at project sites and HQ office building, as well as to monitor HSE performance. At the respective business unit level, a separate OHS Committee was established to discuss preliminary findings of HSE audits conducted by Group Quality Management, any accident/incident reporting, safety performance, issues, challenges and accident avoidance measures. The Group OHS Committee and business unit-level OHS committees meet on quarterly and monthly basis respectively.

In view of the COVID-19 pandemic, S P Setia Berhad established an internal taskforce to protect the health and safety of our employees and general public. The Setia Pandemic Taskforce was established to monitor and track pandemic-related matters, which include the development and enforcement of procedures on contact tracing and quarantine. Kindly refer to the details of COVID-19 initiatives in the Sustainability Statement from pages 146 to 150 for further details.

#### **Key Health and Safety Metrics**

A health and safety culture at the workplace has been embedded within our day-to-day business operation activities, from Group level to all business unit levels through regular HSE inspections at project sites, HSE audits and training awareness sessions. In order to maintain the excellent health and safety standards set by S P Setia Berhad, we targeted zero fatalities and loss time accidents, 100% compliance to regulatory requirements and high HSE standards. In 2020, our OHS performance is illustrated in the table below:

Injury Index FY2020			
Incident Rate	Frequency Rate	Severity Rate	Fatality Rate
0	0	0	0

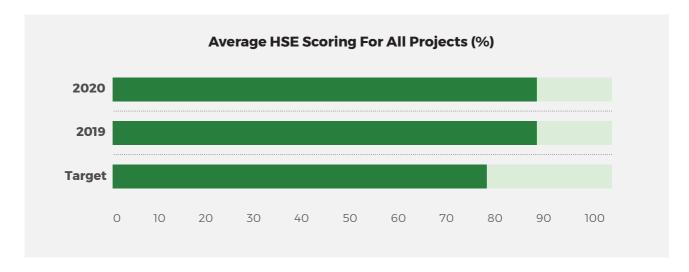
#### Note:

Formulas used for Injury Index are based on Department of Occupational Safety and Health (or Jabatan Keselamatan dan Kesihatan Pekerjaan) Form 8:

- i. Incident rate (Number of accidents x1,000)/(Average number of employee)
- ii. Frequency rate (Number of accidents x 100,000)/(Total manhours worked)
- iii. Severity rate (Total workday lost x 1,000,000)/(Total manhours worked)
- iv. Fatality rate (Number of fatalities x 1,000)/(Total manhours worked)

OHS Performance	2019	2020
Major Incident (case)	0	0
Non-compliance incident (case)	0	0
Penalty (RM)	0	0
Manhours without injuries	14,609,309	14,631,896

Note: Manhours without injuries exclude Setia EcoHill as data was not available.



#### **Health and Safety Monitoring Efforts**

As the property development leader in Malaysia, having a safe work environment has contributed towards safeguarding our reputation and supported our project tenders. Our Head of Group Quality Management - Product Quality and HSE ensures that we comply with all regulatory requirements as well as adhere to our HSE policies and OHS procedures across all Business Units.

In 2020, we enhanced our OHS management standards to comply with ISO45001:2018 Occupational Health and Safety Management, a globally-recognised standard to manage occupational health, safety risk and opportunities.

In addition, we established procedures for COVID-19 control measures at the workplace, adhering to MITI's requirements for all project sites and HQ office building to manage pandemic risks and ensure continuity of business operations. Kindly refer to the details of COVID-19 initiatives in the Sustainability Statement from pages 146 to 150 for further details.

Our health and safety monitoring efforts through enforcement, monitoring and awareness in 2020 include:

#### **Enforcement**

- Established and implemented the OHS procedures
- Established and implemented COVID-19 control measures
- Conducted monthly HSE audit for all project sites
- Imposed penalties and fines for safety violations
- Ensured adherence of quality HSE standards by contractors and sub-contractor through S P Setia's Quality Excellence Award Programme ("QEAP")
- Issued workers' ID for restricted access to project sites

#### **Monitoring**

- · Reported HSE findings to Group Safety Committee on a quarterly basis during HSE meetings
- · Conducted annual review on the adequacy of HSE policy and procedures
- Established the Setia Pandemic Taskforce to oversee the implementation of COVID-19 control measures

#### **Awareness**

- Conducted various HSE training and awareness briefings on fire safety, emergency response and more to our employees
- Implemented safety tool box briefings at all project sites

#### **HSE Awareness and Trainings**

We believe that health and safety is the responsibility of all. Therefore, the culture of health and safety working environment is inculcated not only to our employees, but also extended to our contractors, through the various awareness programmes and trainings.

Leveraging on the digital transformation journey implemented throughout the year, we were able to continue providing HSE awareness briefings and trainings to our contractors, to ensure 100% adherence to HSE standards set by S P Setia Berhad, at the same time complying with the safety workplace measures.

As for our Business Units, HSE training and awareness programmes were conducted at each business unit level, forming part of the HSE KPIs. Similarly, training sessions were carried out via virtual meetings (i.e. Microsoft Teams).

During the year, most of the HSE training programmes were related to the COVID-19 pandemic, such as First Responders training programme which was initiated and led by our Group Human Resources Department.

Through our annual CEO/COO Dialogue, we were able to drive engagement and communicate our health and safety commitment to our contractors, subcontractors and other business associates. The dialogue provided updates of regulatory requirements, highlighted our HSE standards and procedures, including our expectations on products and service quality.



In 2020, 583 business associates attended the CEO/COO Dialogue. To encourage commitment, awards were given out to S P Setia Berhad's contractors who have performed best under the two (2) main categories of the QEAP, i.e. HSE and Product Quality.

#### C. PRODUCT AND SERVICE QUALITY

#### **Delivering Quality Product**

Quality is directly associated with our capability as a reliable and sustainable developer. We are committed to consistently meet and exceed every customer's needs by providing exceptional product quality and customer service.

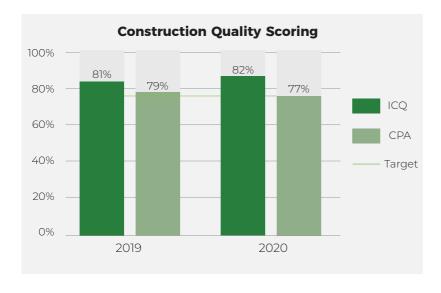
#### **Quality Commitment**

We are committed to delivering high quality products and services. Our quality commitment is driven by the Group Quality Management Department, which oversees the quality standards set out by the Group and maintains ISO 9001 Quality Management System accreditation. Our Quality Management System measures product quality performance from In-Process Construction to design, workmanship and Post Construction.

The Group Quality Management Department performs ICQ and CPA to assess product quality performance through regular site audits. The criteria of ICQ and CPA covers architectural and structural building, workmanship of flooring, roofing, ceiling, and installation of mechanical and electrical. To ensure excellent standards were set in product quality, defects were highlighted by the quality team via site quality audits, followed by prompt corrective and preventive actions.

Whereas, for completed construction projects, the quality team performs the CPA to measure quality of the architectural works achieved as per S P Setia Berhad's quality standard, prior handover. A minimum of 75% is required to achieve CPA, in order for the Certificate of Practical Completion to be issued. In 2020, our property development projects exceeded our initial targets, achieving 82% (2019 - 81%) in ICQ and 76% (2019 - 79%) in CPA respectively.

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TEC was established with the objective of achieving technical excellence in terms of technology and innovation for future projects, improvement of product quality, and overcome challenges in construction activities.

Technical excellence covers across six (6) key aspects, which are planning and design, contractor and product quality, consultant, landscape people development and sustainable smart development.

As the Group moves towards sustainability and digitalisation strategy, TEC is conducting research on using augmented reality application to enhance existing parks and exploring Sustainable Smart Township.

#### **Customer Satisfaction**

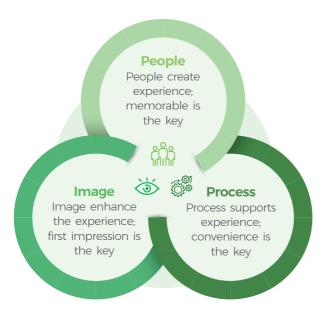
We engage with our customers on a regular basis in order to meet their needs and also provide avenue for feedback on our quality of products and reliability of service. Through our interactions with customers including surveys, we are better placed to gauge and understand their expectations.

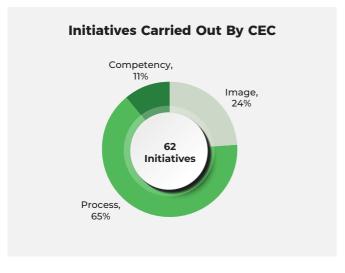
During the year under review, we conducted two customer satisfaction surveys and the results of the surveys were analysed by Group Quality Management Department to identify improvement areas in product quality and customer service. The surveys revealed that on average 79% (2019 - 86%) of home buyers recommended their friends/relatives to purchase S P Setia Berhad's property.

More than half of our Business Units achieved 100% in overall satisfaction and service elements. Our customer service elements such as "ease to contact" and "courtesy and helpfulness" have continually ranked the highest satisfaction score. Whereas improvements on customer service were highlighted in the survey such as follow-through services from both customer relations and site supervisor, handling of customer complaints for customer relations service, handling of rectification works for site supervisor services, and workmanship.

Overview

#### SUSTAINABILITY STATEMENT





We believe delivering great experiences to customers, in return for customer loyalty and cost reductions in the long-term. A Customer Experience Committee ("CEC") was established in S P Setia Berhad, which acts as a holistic approach to a customer centred structure and as master reference point for future development work. Customer Experience Framework which was developed, emphasised on the three (3) key elements which are People, Process and Image. In 2020, the CEC implemented 62 initiatives and programmes for our people to increase the Group's brand image and value.

#### **Cutting Edge through Industrialised Building System**

The Fourth Industrial Revolution (Industry 4.0) came into an era in which the widespread of digital technology applications such as augmented reality and artificial intelligence are seen across all facets of manufacturing. Industry 4.0 is urging the property development industry to deliver products through innovation. To keep ourselves at the forefront of these emerging trends, we were among the early adopters of Industrialised Building System ("IBS") in Malaysia.

Setia Precast Sdn Bhd ("Setia Precast"), our wholly owned subsidiary, manufactures structural components such as walls, beams, and staircases by utilising IBS and precast technology. The adoption of IBS has increased efficiency of construction and meets the quality and safety requirements during construction stage. In recognising high level of construction material quality, our two (2) batching plants located at Setia Federal Hill and Bandar Setia Alam, attained the Certification of Conformity issued by Construction Research Institute of Malaysia's ("CREAM's") Certificate Service ("CCS"), a subsidiary of Construction Industry Development Berhad ("CIDB").

In 2020, we successfully delivered the following residential and commercial developments which were assembled through our IBS technology.

Project	Location	Completion Date
D'Kristal Apartment	Setia EcoHill	October 2020
Government Quarters Bangsar	Bangsar	December 2020
Setia City Residences (Service Apartment)	Bandar Setia Alam	June 2020

#### D. SECURITY PRACTICES

Despite COVID-19, we remained committed in ensuring our townships, sales offices, HQ office, and convention centres were secured and maintained vigilance through stringent security systems. A variety of alternatives were taken to provide a safe living environment for our customers and public as well as a safe workplace for our employees.



#### Safe Living Environment for Customer and Public

The Auxiliary Police Force plays an important role in protecting our customers and public safety. It is a practice for our newly hired Auxiliary Police Force personnel to undergo three (3) months training under Polis Diraja Malaysia ("PDRM"). The training helps new Auxiliary Police Force personnel prepare themselves both physically and mentally to manage the security and safety of customers and the public. To ensure we have a highly-skilled and motivated Auxiliary Police Force, the team's KPIs include maintaining their Body Mass Index ("BMI") score, stamina and strong knowledge foundation in Law, is closely monitored.

In addition to the security protection by Auxiliary Police Force, our townships are equipped with security features ranging from 24-hour daily patrol, single entry and exit point, each home fitted with an alarm system and integrated perimeter fencing security. We also enhanced the security for Setia Eco Park and Setia Eco Glades with the installation of Smart CCTVs at strategic locations. The Smart CCTV system has several features including intelligence surveillance systems with the use of artificial intelligence, intrusion detection, access control management, face recognition and contact tracing.





#### Safe Working Environment for Employee

We strive to provide a safe working environment for our employees by outsourcing security guards from selected reliable security services providers. Stringent criteria were imposed during the outsourcing and selection process, from ensuring valid licences to compliance with the relevant government's security requirements. In 2020, 109 security guards continued to be hired for S P Setia Berhad HQ office and sales offices.

Yearly evaluation and constant monitoring were carried out to assess the performance and capabilities of the security guards in ensuring the safety and security of our employees and public at large. Setia's Security team's daily routine include a roll-call by our management team to ensure constant service quality.

#### E. LOCAL COMMUNITIES



The S P Setia Foundation has been incepted since 2020, with the aim of lending a helping hand to underprivileged Malaysians. We are proud to be able to touch many lives for the past 20 years through the various programmes and initiatives carried out.

Governed by our Board of Trustee and Trust Deed, the activities carried out under S P Setia Foundation have the following objectives:

- · Assisting in the advancement of the education of disadvantaged pupils in Malaysia;
- Performing initiatives which cater for the relief of distress amongst Malaysians affected by epidemics of diseases, natural disasters or other similar emergencies;
- Providing assistance in meeting the needs of Malaysians who are underprivileged, disabled, poverty stricken or critically ill;
- Organising activities that will promote national unity through education, sports, culture or the arts, particularly amongst the youth of various races.

In 2020, Setia Foundation contributed RM2.45 million to the community.

In addition to the RM1 million contribution by S P Setia Berhad to the Government-Linked Investment Companies' Disaster Response Network, S P Setia Foundation spent another RM629,700 to provide medical equipment and supplies to 26 identified hospitals across Malaysia, including Sabah. The donations included 4,300 units N95 masks, 50 units Mercy Care Intubation Protection Box, 25 units syringe pump, 10 units video laryngoscope, three (3) units patient monitors, unit ventilators, 10 units of powered air purifying respirators and three (3) units of high-flow nasal cannulas.



#### **Setia Caring School Programme**

Since 2015, S P Setia Foundation has been taking in schools under the Setia Caring School Programme ("SCSP"). This programme aims at nurturing students to be more empathetic, morally grounded and sets the foundation towards developing a caring society. Starting with three (3) schools during the pilot programme, we have now expanded to include nine (9) schools, across diverse groups and backgrounds.

Prior to the COVID-19 pandemic, students from different schools under the SCSP Programme were given the opportunity to physically participate in various programmes initiated by the schools and S P Setia Foundation. Through these programmes, they did not only gain knowledge and enjoyed themselves, but were also able to foster stronger relationships and drive unity.

Through the Teachers Roundtable Discussion which is usually held at least once a year, we were able to gather feedback and response from the teachers on the pressing issues and critical needs faced by the students and their families.

During the year, RM166,536 was spent on our Pastoral Care Programme to create a Safe Happy Intelligent Place ("SHIP" Room) for the students. This is aligned with the Malaysian Government's initiative to establish community centres as transit centres for children to attend after school as well as alleviate the cost of living for the urban B40 Group, especially working parents.

The SHIP Room was created with the aim of providing students a safe space after school hours, and allowing the students to pick up and nurture good habits at a young age. Reading materials, reference materials, and mind stimulating games were provided. Additionally, five (5) refurbished computers were donated to each school, equipped with online learning programmes which were subscribed by the schools and borne by S P Setia Foundation.



Due to the loss of income caused by the pandemic, we have seen an increase of B40 Group families among our adopted schools, i.e. a 64% increase from 1,390 students in 2019 to 2,284 students in 2020. To alleviate the living costs of these students, S P Setia Foundation spent RM342,268 on our Student Annual Stipend Programme to provide for education assistance to the identified B40 Group students. The stipend allowed students to purchase exercise books, stationaries, sports attire, and bags amongst others. An additional RM177,840 stipend was provided to 1,880 students, used for purchasing school uniforms to further alleviate their financial burden.

Our maiden School Hygiene Education ("SHE") Programme was launched in response to the COVID-19 outbreak. A total investment amount of RM877,478 was spent to provide personal hygiene kits and equipment to both the students and the schools, as well as to inculcate the habit of 'Amalan 3W' among students.



To date, we have carried out four (4) phases of distributing disposable face masks to schools under our care, two (2) phases of distributing face mask and casing, two (2) phases of distributing soap and sanitiser dispensers, and surface spray sanitisers and refills.

#### #StandTogether Campaign

The #StandTogether anti-bullying campaign co-initiated by S P Setia Foundation and Star Media Group's R.AGE has been running for three (3) years and is going strong. Endorsed by the Education Ministry, in 2020, this campaign became more relevant for Malaysians as empathy and kindness is the best way to cope with anxiety and hardships amidst the COVID-19 pandemic.

Despite the challenges that came with the pandemic, we continued to engage the different stakeholders that consist of students, educators, Team Setia and society at large, to stand up against bullying and to revive the simple act of kindness. Themed #EmpathyEmpowers, #StandTogether 2020 was aimed to impart the kindness message to a bigger crowd by conducting a series of online-based experiences which includes:

#### i. Kindness Challenge

There were a total of 729 participants who joined in daily kindness missions which was conveyed via WhatsApp-based "kindness chat bots" during the National Kindness Week, which was held from 21-27 September 2020. Every day, a message will be sent to the participants to perform a simple act of kindness and spread positivity.





Participants of the five-day Kindness Challenge received daily kindness missions via WhatsApp kindness chat bots

#### ii. Kindness Leadership Programme

Our first ever #StandTogether Kindness Leadership Programme, participated by a total of 1,112 participants, was formed with the objective of guiding students to becoming advocates for kindness and empathy in their schools and communities by providing resources, mentorship and even a financial grant. Essentially, it encompasses:

- A year-long fellowship between Members of Parliament and celebrities via exclusive access to activities and learning opportunities
- An e-learning programme using the Education Ministry's Google Classroom platform to teach kind and empathetic leadership through a 6-weeks course
- A peer support network which provides an online community for students to support each other



#### iii. Kindness Workshops

To reinforce the campaign's messaging, #StandTogether curated several educational content. Some of which are presented by celebrity ambassadors such as Harith Iskander, Farah Ann, Lisa Surihani and more. This year, there were 17 Kindness Workshops organised online across 14 states, with two (2) open to the general public. The workshops which were funded by KitaConnect, a youth network by Unicef Malaysia, was participated by 2,927 participants.



Kindness ambassadors participated in the online Kindness Workshop with special celebrity appearances

The @KitaConnect Telegram channel by Unicef Malaysia saw an additional participation of 2,000 in the Teen Takeover Challenge by students and teachers during the #StandTogether campaign. The challenge calls upon all youth to share videos on how they have been spending their time at home during the MCO.

#### **Employee Financial Assistance**

Financial assistances was also extended to all employees of S P Setia Group who were in dire need of financial support such as unexpected hospitalisation and medical expenses, handicapped or disabilities, victims of natural disaster and any other deserving, cases based on merit. The recommendations were submitted to the Board of Trustees for approval. To date, we have provided assistance amounting to RM33,823 to our employees.

# SUSTAINABILITY STATEMENT MAPPING TO GRI

#### A. MAPPING GRI CONTENT INDEX - CORE OPTION

GRI STANDARD	DISCLOSURE	REFERENCE
	GENERAL DISCLOSU	RES
102-1	Name of the organisation	S P Setia Berhad
102-2	Activities, brands, products and services	Overview, pages 6 to 19
102-3	Location of headquarters	Pages 6 to 7
102-4	Locations of operations	Where We Operate Our Presence, pages 14 to 15
102-5	Ownership and legal form	Corporate Structure, pages 10 to 12 Analysis of Shareholdings, pages 340 to 345
102-6	Markets served	Where We Operate Our Presence, pages 14 to 15 Our Property Portfolio, pages 16 to 17 Our Operating Environment, page 24
102-7	Scale of the organisation	Corporate Structure, pages 10 to 12 Management Discussion & Analysis, pages 35 to 81
102-8	Information on employees and other workers	Leadership, pages 83 to 103 Employment, pages 176 to 183 Occupational Health and Safety, pages 184 to 186
102-9	Supply chain	Economic & Property Market Report, pages 36 to 37
102-10	Significant changes to the organisation and its supply chain	Not applicable
102-11	Precautionary principle or approach	Not applicable
102-12	External initiatives	Indirect Economic Impacts, pages 165 to 166
102-13	Membership of associations	Page 163
102-14	Statement from senior decision maker	Chairman's Message, pages 22 to 27
102-18	Governance structure	Corporate Governance Overview Statement, pages 105 to 119 Sustainability Governance, page 152
102-40	List of stakeholder groups	Stakeholders Engagement, pages 30 to 33
102-42	Identifying and selecting stakeholders	Stakeholders Engagement, pages 30 to 33
102-43	Approach to stakeholder engagements	Stakeholders Engagement, pages 30 to 33
102-44	Key topic and concerns raised	Key Risks and Mitigation, pages 40 to 41 Stakeholders Engagement, pages 30 to 33
102-45	Entities included in the consolidated financial statements	Corporate Structure, pages 10 to 12
102-46	Defining report content and topic boundaries	Pages 142 to 143
102-47	List of material topics	Materiality Assessment and Key Sustainability Matters pages 154 to 159
102-48	Restatements of information	Natural Resources, pages 170 to 175
102-49	Changes in reporting	Not applicable
102-50	Reporting period	Page 142
102-51	Date of most recent report	The Sustainability Statement is issued on an annual basis together with S P Setia Berhad's Annual Report, which is accessible here: https://spsetia.com/en-us/investor-relations

GRI STANDARD	DISCLOSURE	REFERENCE	
GENERAL DISCLOSURES (CONTINUED)			
102-52	Reporting cycle	Reporting Scope, page 142	
102-53	Contact point for questions regarding the report	Feedback, page 143	
102-54	Claims of reporting in accordance with the GRI Standards	Reporting Scope, page 142	
102-55	GRI content index	Mapping to GRI, pages 194 to 196	
102-56	External assurance	Our Sustainability Journey, page 144	

#### B. MAPPING GRI CONTENT INDEX - SPECIFIC TOPICS

GRI STANDARD	DISCLOSURE	REFERENCE		
	MATERIAL TOPICS			
Economic Performance				
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
201-1	Direct economic value generated and distributed	Financial Statements, pages 197 to 339.		
	Indirect Economic Imp	pacts		
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
203-1	Infrastructure investments and services supported	Indirect Economic Impacts, pages 165 to 166		
203-2	Significant indirect economic impacts	Indirect Economic Impacts, pages 165 to 166		
	Anti-Corruption Anti-Corruption			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
205-1	Operations assessed for risks related to corruption	Anti-Corruption, pages 167 to 168		
205-2	Communication and training about anti-corruption policies and procedures	Anti-Corruption, pages 167 to 168		
205-3	Confirmed incidents of corruption and actions taken	Anti-Corruption, pages 167 to 168		
	Energy			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
302-1	Energy consumption within the organisation	Energy Efficiency, page 171		
302-3	Energy intensity	Energy Efficiency, page 172		
	Water			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
303-5	Water consumption	Water Efficiency, page 173		
	Biodiversity			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Biodiversity, page 174		

# SUSTAINABILITY STATEMENT MAPPING TO GRI

GRI STANDARD	DISCLOSURE	REFERENCE		
	MATERIAL TOPICS (CONT	INUED)		
	Environmental Compliance			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
307-1	Non-compliance with environmental laws and regulations	Environmental Compliance, page 175		
	Employment			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
401-1	New employee hires and employee turnover	Goals and Progress, page 151 New Hires Profile, page 179		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Workplace and Employee Benefits, pages 179 to 180		
401-3	Parental leave	Workplace and Employee Benefits, pages 179 to 180		
	Occupational Health and	Safety		
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
403-1	Occupational health and safety management system	Occupational Health and Safety, pages 184 to 186		
403-2	Hazard identification, risk assessment and incident investigation	Occupational Health and Safety, pages 184 to 186		
403-3	Occupational health services	Occupational Health and Safety, pages 184 to 186		
403-4	Worker participation, consultation, and communication on occupational health and safety	Occupational Health and Safety, pages 184 to 186		
403-5	Worker training on occupational health and safety	Occupational Health and Safety, pages 184 to 186		
403-6	Promotion of worker health	Occupational Health and Safety, pages 184 to 186		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety, pages 184 to 186		
403-8	Workers covered by an occupational health and safety management system	Occupational Health and Safety, pages 184 to 186		
403-9	Workers covered by an occupational health and safety management system	Occupational Health and Safety, pages 184 to 186		
403-10	Work-related injuries	Occupational Health and Safety, pages 184 to 186		
	Training and Educati	ion		
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
404-1	Average hours of training per year per employee	Talent Development, pages 180 to 181		
404-2	Programmes to update employee skills and transition assistance programmes	Talent Development, pages 180 to 181		
	Diversity & Equal Opportunity			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
405-1	Diversity of governance bodies and employees	Diversity and Inclusion, pages 176 to 179		
	Security Practices			
103-1	Explanation of the material topic and its boundaries	Materiality Assessment and Key Sustainability Matters, pages 154 to 159		
410-1	Security personnel trained in human rights policies or procedures	Security Practices, page 189		

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