



SUSTAINABILITY REPORT 2021



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1. BOARD'S STATEMENT

We reaffirm our commitment to sustainability with the publication of this sustainability report (“**Report**”). This Report highlights our environmental, social, governance (“**ESG**”) factors and economic performance (“**Sustainability Factors**”).

Our core business remains in distribution of wood products. Within this industry, there is an increasing attention to sustainable forestry, hence ensuring that sources of raw materials are derived from sustainable supplies is a key focus for us and we place great emphasis on maintaining the Forest Stewardship Council® (FSC®) certification and conserving water and energy through operational efficiency. We believe that sustainable growth is delivered through fair and equitable behaviour which drives talent retention, repeat customer activity and confidence amongst our shareholders. Such a belief and resulting actions will optimise our impacts on the economy, environment and society. As we diversify into property development, we will be conscious of our new impacts on the economy, environment and society and will adjust our sustainability strategy accordingly.

The Board of Directors (“**Board**”) oversees the management and monitor material Sustainability Factors. For this Report, the Board has considered Sustainability Factors as part of our strategic formulation and determined the material Sustainability Factors.

A sustainability policy (“**SR Policy**”) covering our sustainability strategies, reporting structure, materiality assessment and processes in identifying and monitoring material Sustainability Factors has been put in place and serves as a point of reference in the conduct of our sustainability reporting. Under this SR Policy, we will continue to monitor, review and update our material Sustainability Factors from time to time, taking into account the feedback that we receive from our engagement with our stakeholders, organisational and external developments. Please refer to Policy, Practice and Performance Reporting for further details.

Our sustainability framework communicates our commitment towards supporting the United Nations’ Sustainable Development Goals (“**SDGs**” or “**Global Goals**”) and is supported by our key stakeholders. We work closely with stakeholders in our value chain and their inputs drive our sustainability focus on our Sustainability Factors and the SDGs as follows:



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A summary of our key sustainability performance in FY2021 is as follows:

Ref	Performance indicator	Sustainability performance	
		FY2021	FY2020
Economic			
7.1	Revenue	S\$26.6 million	S\$17.3 million
7.1	Loss for the year	(S\$0.2 million)	(S\$6.6 million)
Environmental			
7.2	Water consumption intensity (CuM/ revenue S\$' 000)	0.8	1.3
7.2	Greenhouse Gas (“GHG”) emissions intensity (tonnes CO ₂ e/ revenue S\$'000)	0.02	0.03
7.3	Percentage of suppliers certified with relevant environmental certifications and criteria	100%	100%
7.4	Percentage of wood waste recycled	100%	100%
Social			
7.5	Number of workplace fatalities	0	0
7.5	Number of recordable work-related injuries	0	0
7.6	Number of reported incidents of unlawful discrimination ¹ against employees	0	0
7.7	Average training hours per employee	1.2	35.3
7.8	Turnover rate	17.1%	10.3% ²
7.9	Number of reported substantiated complaints concerning breaches of data privacy and losses of personal data	0	0
Governance			
7.11	Number of reported incidents of non-compliance with the relevant legal and regulatory requirements	0	0
7.12	Number of incidents of serious offence ³	0	0

We face uncertainties as a result of the Coronavirus disease 2019 (“COVID-19” or “Pandemic”) which affected our operations. To counter the adverse impact of the Pandemic on our operations, we have diversified our sources of supply to reduce the uncertainties brought about by the Pandemic. Our responses to the impact of the Pandemic are detailed in the relevant sections of this Report.

Moving forward, sustainability will always remain at the heart of the Group’s business. We sincerely believe that it is key to developing a competitive advantage and will be the differentiator for our long-term future.

2. CORPORATE PROFILE

Sitra Holdings (International) Limited (“Sitra” or the “Company”) and its Subsidiaries (the “Group”) is an international distributor of high-quality wood-based products and premium lifestyle outdoor furniture. The Group markets its products under its proprietary brands of Comcia, deckKING and Pacific. The Group’s products can be categorised into two main types, namely (i) high-value wood-based products such as decks and decking systems, flooring, a full range of fences, and other Do-It-Yourself products; and (ii) premium lifestyle furniture such as outdoor garden furniture and contract furnishings.

Sitra has been awarded the FSC® Chain of Custody certification since 2007 which supports responsible forestry management. Under this certification, the timber used to manufacture our products can be traced throughout the supply chain from the source to the sales.

In 2021, Sitra introduced a range of products derived from controlled sources under the Programme for the Endorsement of Forest Certification (“PEFC”) to our buyers which demonstrated that the PEFC Due Diligence System has been implemented for our products. This is a step further to provide assurance that

¹ Unlawful discrimination refers to an incident of employee discrimination whereby the relevant authority has commenced investigation and resulted in a penalty to the Company.

² Figure has been restated as a correction.

³ A serious offence is defined as one that involves fraud or dishonesty amounting to not less than \$100,000 and punishable by imprisonment for a term of not less than 2 years which is being or has been committed against the Company by officers or employees of the Company.

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we are part of an extensive ecosystem to manage forests in meeting challenging environmental, social and economic requirements and to broaden our sustainability journey.

The Group serves a network of over 290 corporate customers in 58 countries spanning North America, Europe, Australia, New Zealand and Asia. We develop our own lifestyle furniture products and brands and have gained a following amongst customers in Europe.

On 4 October 2019, the Group acquired a 54% equity interest in Mapur Rocky Resort Limited with the intention to diversify the business into resort and holiday homes development. The Group's core businesses now include distribution of wood-based products and property development in Bintan, Indonesia. The Group will further assess the COVID-19 situation before progressing materially on its property development division.

2.1 Our brands



COMCIA

Under the Comcia brand, we provide a wide variety of high value wood-based products such as decking, flooring, fencing, door and window components and other moulded products. Each category of our wood-based products offer different designs, specifications and dimensions to suit the varying requirements of our customers.



decKING

As our decking products gain in momentum, the “decKING” brand name was developed in 2004, to reflect our vision – that is to be a leader in this growing segment.



Pacific

The “Pacific” range of brands was developed in 2003 as we embarked on a new segment of business outdoor lifestyle furniture. The word, Pacific, signifies peace and the feeling of being at one with nature.

2.2 Our business

An overview of the Group's business is presented as follows:



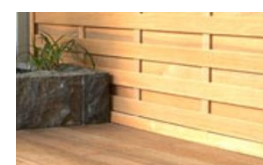
Our Suppliers

Suppliers for timber, wood-based products and lifestyle furniture



Our Operations

- Manufacturing of wood-based and other related products at our production factory in Indonesia
- Import and export of wood-based and other related products



Our Customers

- Customers located in the following geographic areas:
- Australia and New Zealand
 - Europe
 - Asia and Others

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3. REPORTING PERIOD AND SCOPE

This Report covers data and information from 1 January 2021 to 31 December 2021 (“**FY2021**” or “**Reporting Period**”) and discusses Sitra’s sustainability performance.

This Report covers our operations in Singapore, Indonesia and France which contributed approximately 100% (FY2020: 73% - Singapore and Indonesia only) of our total revenue for the Reporting Period.

The electronic edition of this Report is available at: <https://www.sgx.com/securities/company-announcements>.

4. REPORTING FRAMEWORK

This Report has been prepared in accordance with the Global Reporting Initiative (“**GRI**”) Standards: Core option and published pursuant to 711A and 711B of the Listing Manual Section B: Rules of Catalist of the Singapore Exchange Securities Trading Limited (“**SGX-ST**”) listing rules. We have chosen to report using the GRI Standards: Core option as it is an internationally recognised reporting framework.

As part of our continual efforts to align our sustainability reporting with relevant market standards, we have mapped our sustainability efforts to the 2030 Agenda for Sustainable Development which is adopted by all United Nations Member States in 2015 (“**UN Sustainability Agenda**”). The UN Sustainability Agenda provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 SDGs, which form an urgent call for action by all countries - developed and developing - in a global partnership. We have incorporated the SDGs, where appropriate, as a supporting framework to shape and guide our sustainability strategy.

While we have not sought for external assurance for this Report, we have relied on internal data monitoring and verification to ensure accuracy. We will work towards external assurance for our future sustainability reports.

5. STAKEHOLDER ENGAGEMENT

We strive to be a responsible corporate citizen by working closely with our stakeholders to understand their concerns and feedbacks and keep them abreast of the developments of our businesses. Through an internal stakeholder mapping exercise, we have identified key stakeholder groups which we prioritise our engagements with. These include individuals or groups that have an interest that is affected or could be affected by our activities.

The stakeholder engagement provides valuable information for our sustainability reporting, particularly in determining material environment and social issues. We will continue to engage our external stakeholders more extensively to identify areas that are material, sustainable and necessary for future development.

We actively engage our key stakeholders through the following channels:

Our key stakeholders	How we engage them	Frequency of engagement	Key concerns
Customers	<ul style="list-style-type: none">Business meetings	<ul style="list-style-type: none">As and when required	<ul style="list-style-type: none">Product featuresValue propositionResponsiveness to customer feedbackData protection
	<ul style="list-style-type: none">Informal feedbacksSocial media platformsMessaging applications	<ul style="list-style-type: none">Regularly	

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Our key stakeholders	How we engage them	Frequency of engagement	Key concerns
Shareholders	<ul style="list-style-type: none"> Annual General Meeting Annual reports Sustainability reports 	<ul style="list-style-type: none"> Annually 	<ul style="list-style-type: none"> Financial results Dividend payment Market valuation Corporate governance Key business developments such as acquisitions or new business developments
	<ul style="list-style-type: none"> Emails and telephone calls 	<ul style="list-style-type: none"> As and when required 	
	<ul style="list-style-type: none"> Announcements via SGXNet 	<ul style="list-style-type: none"> Half-yearly 	
Employees	<ul style="list-style-type: none"> Periodic staff meetings Company events Internal communication through emails and noticeboards 	<ul style="list-style-type: none"> As and when required 	<ul style="list-style-type: none"> Data protection Performance reviews Equal employment opportunity Career development and training opportunities Job security Remuneration
	<ul style="list-style-type: none"> Performance appraisals 	<ul style="list-style-type: none"> Annually 	
Suppliers	<ul style="list-style-type: none"> Emails and telephone calls Messaging applications 	<ul style="list-style-type: none"> As and when required 	<ul style="list-style-type: none"> Information update and feedbacks on their products and services
Government and regulatory agencies (collectively as “Regulators”)	<ul style="list-style-type: none"> Consultations and briefings organised by key regulatory bodies such as the Singapore Stock Exchange and relevant government agencies/ bodies 	<ul style="list-style-type: none"> As and when required 	<ul style="list-style-type: none"> Regulatory standards and guidelines
Communities	<ul style="list-style-type: none"> Community campaigns 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Corporate social responsibility Environmental initiatives

6. POLICY, PRACTICE AND PERFORMANCE REPORTING

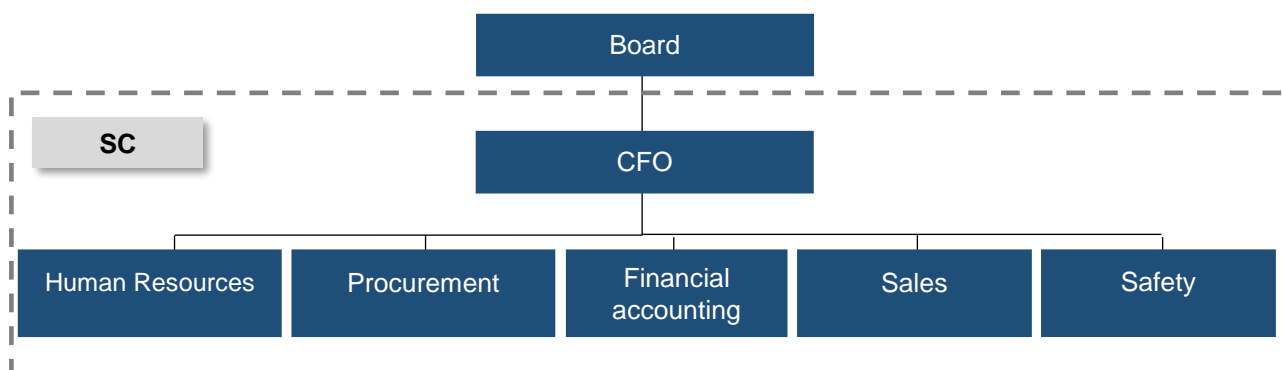
6.1 Reporting structure

With our vision and corporate values in mind, we aim to integrate sustainability into our businesses so that it is systematic and seamless. Where possible, we incorporate sustainability considerations in our decision-making processes.

Our sustainability efforts are led by our Sustainability Committee (“**SC**”), which comprises senior management executives and key managers of various functions, and tasked to ensure that the Group’s business objectives are in line with our commitments to sustainable development. The SC is led by our Chief Financial Officer (“**CFO**”) and is responsible for on-going communication with the Board.

The SC determines focus areas where the Group can have the greatest economic, environmental and social impact, as well as the areas that are most important to our stakeholders. The reporting structure is as follows:

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6.2 Sustainability reporting process

Under our SR policy, our sustainability process begins with the identification of relevant Sustainability Factors. Relevant Sustainability Factors are then prioritised as material Sustainability Factors which are then validated. The end result of this process is a list of material Sustainability Factors disclosed in this Report. Inter-relationships between the processes are shown in the chart below:



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6.4 Performance tracking and reporting

We track the progress of our material Sustainability Factors by identifying the relevant data points, monitoring and measuring them. In addition, we set performance targets that are aligned with our strategy to ensure that we remain focused in our path to sustainability. We shall consistently enhance our performance-monitoring processes and improve our data capturing systems. We believe that there is always room for improvement, and we seek to continuously review our sustainability metrics as we embark on this journey of improving global sustainability, better corporate governance and greater economic contribution to society.

7. MATERIAL SUSTAINABILITY FACTORS

In 2021, a materiality assessment was conducted by the SC to understand the concerns and expectations of our stakeholders. Through the materiality assessment, Sustainability Factors material to the sustainability of our business and their reporting priority level were updated. In this Report, we have also reported our progress in managing these Sustainability Factors and set related targets to improve our sustainability performance.

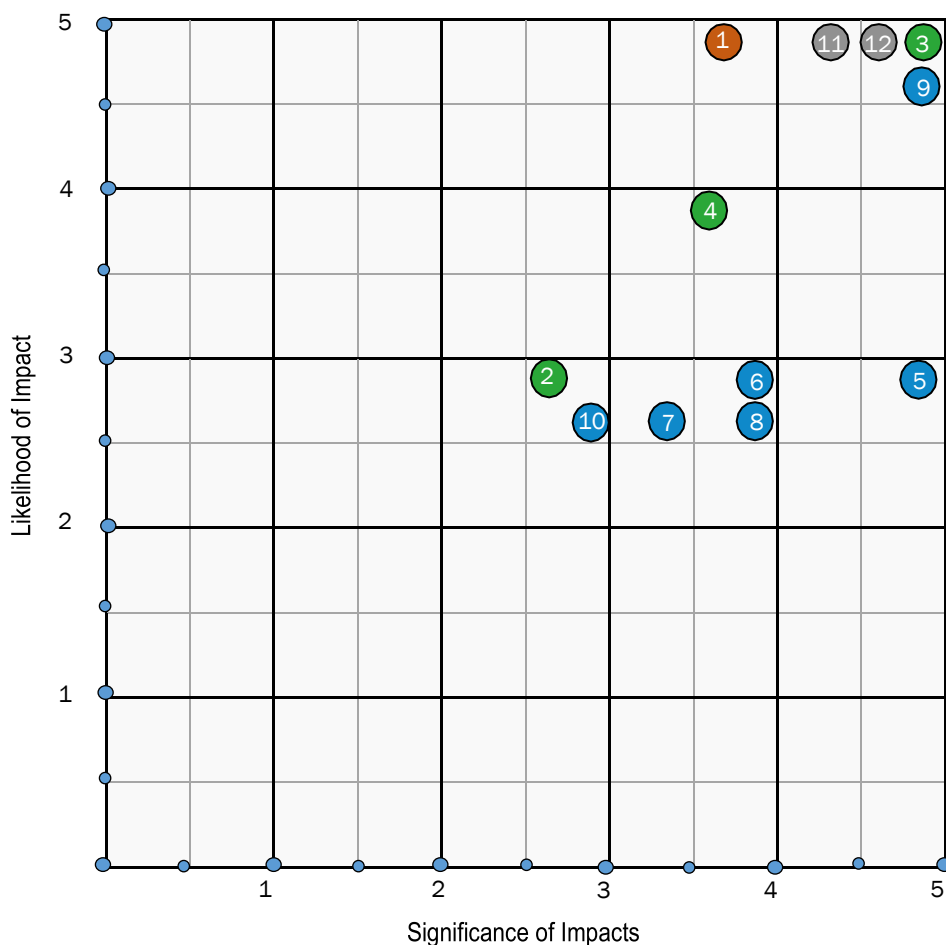
Presented below is a list of material Sustainability Factors and material factor matrix applicable to our Group:

List of material Sustainability Factors

Ref	Material Sustainability Factor	SDG	Key stakeholder
Economic			
7.1	Sustainable business performance	<ul style="list-style-type: none"> Decent work and economic growth 	<ul style="list-style-type: none"> Customers Employees Shareholders
Environmental			
7.2	Water and energy conservation and emissions reduction	<ul style="list-style-type: none"> Affordable and clean energy Clean water and sanitation 	<ul style="list-style-type: none"> Communities Shareholders
7.3	Supply chain management and product responsibility	<ul style="list-style-type: none"> Responsible consumption and production 	<ul style="list-style-type: none"> Customers Suppliers
7.4	Waste management	<ul style="list-style-type: none"> Responsible consumption and production 	<ul style="list-style-type: none"> Regulators Shareholders
Social			
7.5	Employee health and safety	<ul style="list-style-type: none"> Good health and well-being 	<ul style="list-style-type: none"> Employees
7.6	Diversity and equal opportunity	<ul style="list-style-type: none"> Reduced inequalities 	<ul style="list-style-type: none"> Employees
7.7	Training and employee development	<ul style="list-style-type: none"> Quality education 	<ul style="list-style-type: none"> Employees
7.8	Employee relationship Management	<ul style="list-style-type: none"> Decent work and economic growth 	<ul style="list-style-type: none"> Employees
7.9	Data privacy and protection	<ul style="list-style-type: none"> Peace, justice and strong institutions 	<ul style="list-style-type: none"> Customers Employees
7.10	Ongoing community engagement	<ul style="list-style-type: none"> Sustainable cities and communities 	<ul style="list-style-type: none"> Communities
Governance			
7.11	Compliance with corporate Governance	<ul style="list-style-type: none"> Peace, justice and strong institutions 	<ul style="list-style-type: none"> Regulators Shareholders
7.12	Anti-corruption and anti-fraud	<ul style="list-style-type: none"> Peace, justice and strong institutions 	<ul style="list-style-type: none"> Regulators Shareholders

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Material factor matrix



Legend for Sustainability Factor

- Economic
- Environmental
- Social
- Governance

1	Sustainable business performance
2	Water and energy conservation and emissions reduction
3	Supply chain management and product responsibility
4	Waste management
5	Employee health and safety
6	Diversity and equal opportunity

7	Training and employee development
8	Employee relationship management
9	Data privacy and protection
10	Ongoing community engagement
11	Compliance with corporate governance
12	Anti-corruption and anti-fraud

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7.1 Sustainable business performance

At present, we operate in Singapore, Indonesia and France, with a global distribution network extending to North America, Europe, Australia, New Zealand and Asia. The success of our business is highly dependent on the commitment of our Board, management and employees. Their knowledge, professional expertise and their job satisfaction are key to identify any sustainability risks and opportunities that may arise.

Sustainability trends such as climate change, resource scarcity and demographic changes shape the competitive environment in which we operate by introducing long-term sustainability opportunities. We therefore view our business performance beyond short-term gains and financial bottom line. Our conviction is to achieve a balanced triple bottom line (People, Planet, Profit) that allows us to clearly demonstrate the key risks and opportunities we face, how our strategy aims to tackle these issues and how we link these to the global agenda and our contribution to the wider economy.

Our strategy embeds sustainable practices into every aspect of our business, ensuring our approach aligns to global priorities and plays a part in a sustainable future for us all. Accordingly, we strive to maintain our market position and contribute positively to the society through our economic presence by serving as Asia Pacific's leading wood-based products and lifestyle furniture industry globally, while maintaining good stewardship of the resources we manage and generating good shareholder values. We also place our customers' interest as the highest priority and seek organic growth from the existing operations as well as growth through acquisition of new businesses that can reap good returns growth.

For more information on Sitra's financial and business performance, please refer to the annual report for FY2021.



- S\$26.6M revenue generated
- S\$0.2M net loss for the Reporting Period



- 54% revenue growth over the Reporting Period
- 98% decrease in net loss for the Reporting Period

Target for FY2021	Performance in FY2021	Target for FY2022
Target positive return to shareholders	<ul style="list-style-type: none"> • 54% increase in revenue • 98% decrease in net loss for the Reporting Period • Due to the uncertainties brought by COVID-19 and on a prudent basis, no dividend has been declared or recommended for the financial year ended 31 December 2021 	Maintain or improve our financial performance subject to market conditions

7.2 Water and energy conservation and emissions reduction

We are driven by our commitment to conserve water and energy resources and reduce carbon emissions to preserve the environment we operate in, reduce our costs and create enhanced returns to shareholders.

To run our operations, we rely on water and energy resources in the following areas:

- Water is mainly required for production and consumption by our employees and for sanitation;
- Diesel is required for operating machinery and equipment and forklift; and
- Electricity is required for lighting, office equipment and cooling.

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We review our water and energy consumption regularly to control usage and corrective actions are taken when there are unusual consumption patterns. We constantly remind our employees on basic and socially responsible habits at their workplaces such as adopting greener work ethics and switching off appliances if not in use.

Overall, the key statistics on water and energy consumption and related GHG emissions during the Reporting Period are as follows:

Performance indicator	Unit of measurement	FY2021	FY2020
Water consumption			
Water consumption	CuM	21,658.7	21,652.2
Water consumption intensity	CuM/ revenue S\$'000	0.8	1.3
Energy consumption			
Diesel consumption	litre	11,656	9,166
Diesel consumption intensity	litre/ revenue S\$'000	0.4	0.5
Electricity consumption	kWh	584,992	554,146
Electricity consumption intensity	kWh/ revenue S\$'000	22.0	32.1
GHG emissions			
Direct GHG emissions (Scope 1) ⁴	tonnes CO ₂ e	31.7	24.9
Indirect GHG emissions (Scope 2) ⁵	tonnes CO ₂ e	495.7	468.9
Total GHG emissions	tonnes CO ₂ e	527.4	493.8
GHG emissions intensity	tonnes CO ₂ e/ revenue S\$'000	0.02	0.03

The water, energy consumption and GHG emissions intensities decreased as the increase in revenue is more than proportional to the increase in water and energy consumption during the Reporting Period. The increase in revenue is mainly due to a significant increase in the sales of the wood-based products in all our key markets, with further contribution from e-commerce platforms.

Target for FY2021	Performance in FY2021	Target for FY2022
<ul style="list-style-type: none"> Align and finetune the consumption of both water and electricity with regards to our environmental performance Promote stronger environmentally friendly culture 	Water, energy and GHG emissions intensities decreased as the increase in revenue is more than proportional to the increase in water and energy consumption	<ul style="list-style-type: none"> Maintain or reduce water consumption intensity Maintain or reduce GHG emissions intensity

⁴ GHG emissions from diesel consumption (Scope 1) are calculated based on the Greenhouse Gas (GHG) Emissions Measurement and Reporting Guidelines published by the NEA.

⁵ GHG emissions from electricity purchased (Scope 2) are calculated based on the emissions factors published by the relevant local authorities.

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7.3 Supply chain management and product responsibility

As a global business, we recognise the importance of supply chain in managing our sustainability impact. Our supply chain is also crucial for us to deliver quality products to our customers. It is important for us to extend our management of environmental, social and economic impacts to our portfolio of approved suppliers and strategic partnerships.

Our supply chain constitutes mainly the suppliers for our timber, wood-based products, lifestyle furniture for all our global clients. We have maintained a strong partnership with the suppliers for our wood-based products and lifestyle furniture businesses.

We believe in transparency in our supply chain and seek to minimise the risks and optimise the opportunities associated with climate changes. Our aim is to promote sustainable supply chain and to design products for the timber furniture industry that will ensure sustainability in the supply of hardwood.

We control and ensure that the wood used for our products do not originate from controversial sources. We achieve this by controlling the sourcing of wood from our contract manufacturers and by our own factory. Therefore, we make sure that all our supplies are supported by verifiable documentation which identifies the source or region of harvest, including that of our suppliers within the supply chain.

In line with our commitment to forest stewardship, we ensure that 100% (FY2020: 100%) of our suppliers are certified with relevant environmental certifications and criteria such as Sistem Verifikasi Legalitas Kayu ("SVLK")⁶, FSC[®], PEFC and PEFC Controlled Sources⁷.

Target for FY2021	Performance in FY2021	Target for FY2022
Ensure that resources are derived from sustainable resources through the FSC [®] certification	100% of suppliers are certified with relevant environmental certifications and criteria	Maintain the percentage of suppliers certified with relevant environmental certifications and criteria

7.4 Waste management

Proactive mitigation of the environmental impact and protection is deeply embedded within our business model, as aptly demonstrated by our waste management system.

As a strong green advocate for "Reduce, Reuse and Recycle", we have put in place a waste management process to ensure proper disposal of waste and 100% (FY2020: 100%) recycling of our wood waste for the manufacturing of our products.

Wood waste is mainly generated as a result of leftover timber raw materials after cutting logs into different sizes, as well as defective timber raw materials. Small leftover timber raw materials are reused to make small products such as garden tiles and wall panel products. Wood waste that cannot be reused for making small products will be used as feeds to boiler in producing steam for the drying of timber. In FY2021, there is zero incident of non-compliance with the relevant laws and regulations relating to air pollution caused by our operations (FY2020: zero incident).



Wall panel products

⁶ SVLK is Indonesia's national timber legality assurance system, which is a mandatory legality and sustainability certification system that requires all timber from state-owned and private forests to obtain verification of legality – as a guarantee that the timber originates from legal, sustainably-managed sources.

⁷ Tree-based materials are derived from PEFC certified forests or PRFC controlled sources.

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We have launched our Go-Green initiatives across all our operations and corporate office. The implemented initiatives aim to encourage the 'Reuse', 'Recycle' and 'Reduce' of papers through the following ways:

- Reduce the use of papers by publishing electronic annual reports, sending the printers to print on double-sides of each piece of paper and print only when necessary; and
- Reuse single-side printed papers for non-confidential and draft documents.

Target for FY2021	Performance in FY2021	Target for FY2022
<ul style="list-style-type: none"> • Review and implement new waste management processes to minimise wastage • Protect water bodies from being affected by contaminated water and waste discharge 	Our wood waste are 100% recycled in the manufacturing of our products	Ensure wood waste are 100% recycled

7.5 Employee health and safety

A safe working environment allows our employees to work safely without the fear of getting injured. This helps to build loyalty amongst our employees and support the sustainability of the Group. Accordingly, we are committed to prioritise on maintaining a safety and security conscious culture amongst our employees of all levels. We attained bizSAFE Level 3 certification issued by the Workplace Safety and Health Council. This certification recognises our continuous efforts to embed a positive health and safety culture in our operations.



The management team sets a strong foundation by providing clear direction within the organisation of the value of an effective occupational health and safety management approach to foster risk-free and environment-friendly premises. We put in place an occupational health, safety and security policy to guide the Group in achieving high workplace health and safety standards and lead the group in adhering to the relevant Workplace Safety and Health regulations as stipulated by the Ministry of Manpower ("MOM"), Workplace Safety and Health Council ("WSHC") and the relevant regulatory authorities of countries we operate in.

To ensure the safety of our employees and minimise the risk of transmission amongst our employees, we adhere to the guidelines and measures passed by the local COVID-19 laws and regulations. These measures include work from home arrangements and the implementation of safe distancing measures in the office, such as mask wearing. Our operations are closely monitored and reviewed by our appointed safety officers, who ensure all employees comply with safety policies and procedures.

Our emphasis on promoting workers' health and improving occupational safety has resulted in zero (FY2020: zero) workplace fatalities, high-consequence work-related injuries⁸, recordable work-related injuries and recordable work-related ill health cases in our workplace in FY2021.

Target for FY2021	Performance in FY2021	Target for FY2022
Continue to uphold our mandate to target zero injuries and fatalities amongst our workforce	Maintained zero workplace fatalities, high-consequence work-related injuries, recordable work-related injuries and recordable work-related ill health cases	Maintain zero workplace fatalities, high-consequence work-related injuries, recordable work-related injuries and recordable work-related ill health cases

⁸ High-consequence work-related injuries refer to injuries from which the worker cannot recover or cannot recover fully to pre-injury health status within 6 months.

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7.6 Diversity and equal opportunity

Identifying, recognising and rewarding quality employees is essential in our hiring and retention strategy. We advocate fair employment practices by ensuring equal opportunities for recruitment, fair remuneration, career progression and training opportunities. We provide fair employment opportunities to all, regardless of age, gender, race, or nationality.

The total number of full-time employees in the Group as at 31 December 2021 is 33 (FY2020: 35) and we have zero (FY2020: 3) part-time employees in FY2021.

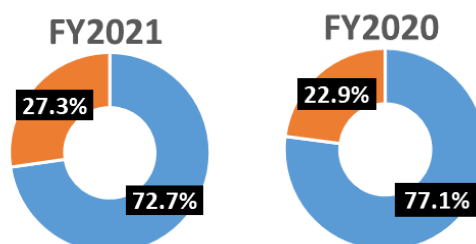
The percentage of female to full-time employees is 27.3% (FY2020: 22.9%). Due to the nature of our business, our workforce is predominantly staffed by male employees. Sitra maintains fair and open employment policy through providing fair employment opportunities to both young and mature workers. Our employees who are at least 40 years old contribute to 78.8% (FY2020: 72.7%) of the workforce.

Our strategy for recruitment and retention of talents includes cooperation with professional institutions, talent pool development and retention, and staff grievance mechanism. In terms of employee skills profile, our employees comprise professionals, managers, executives and technicians (“PMET”) and we have maintained a fair proportion of professional and management team, contributing to 30.3% (FY2020: 32.4%) of our workforce, to lead and drive the business growth in our business segments.

We ensure that fair work practices are implemented, and remuneration is set based on individual’s work performance. No form of discrimination is tolerated within our organisation. There is no reported incident (FY2020: zero) of unlawful discrimination against employees.

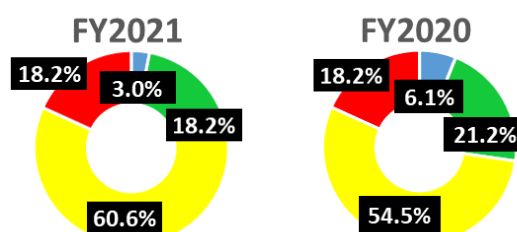
Gender ratio

	FY2021	FY2020
Male	72.7%	77.1%
Female	27.3%	22.9%



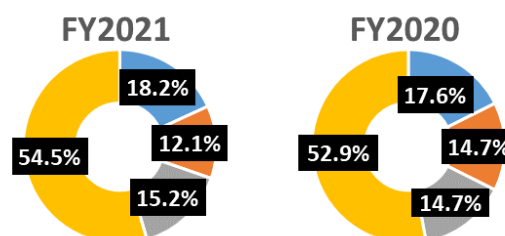
Employee age profile

	FY2021	FY2020
Below 30 Years	3.0%	6.1%
31 to 40 Years	18.2%	21.2%
41 to 55 Years	60.6%	54.5%
Above 56 Years	18.2%	18.2%



PMET classification

	FY2021	FY2020
Directors	18.2%	17.6%
Managers / Executives	12.1%	14.7%
Sales and Services	15.2%	14.7%
Operators	54.5%	52.9%



Target for FY2021	Performance in FY2021	Target for FY2022
Maintain our social objectives of ensuring non-discriminatory employment practices	Maintained zero reported incident of unlawful discrimination against employees	Maintain zero reported incident of unlawful discrimination against employees

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7.7 Training and employee development

Pivotal to our success is our people performing at their best. We value the vital contributions by all employees towards sustaining Sitra's long term success. One of our main challenges is to attract and retain talents. To this end, we have developed our brand and company values and actively communicate them to our employees to build belongingness and loyalty. Apart from providing fair and sustainable financial incentives to our employees, we also strive to create a culture of learning organisation through training and skills upgrading opportunities.

We constantly develop our employees through providing annual performance review. We will continue to equip our employees with training through conferences and courses related to their work areas. We will continuously recruit talents, particularly good talents, and groom them through mentorship and on-the-job training programmes.

Training and education

	FY2021	FY2020
Total training hours	40.5	1,128
Average training hours per employee	1.2	35.3

The decrease in total and average training hours is mainly due to the high amount of online training attended by employees during lockdown in FY2020 to ensure that employees are prepared for economic recovery and growth after COVID-19.

Target for FY2021	Performance in FY2021	Target for FY2022
Invest in strengthening our employee training and development by increasing the total and average training hours by 10%	Decrease in total and average training hours	Improve average training hours per employee

7.8 Employee relationship management

To underscore our care and commitment towards our employees, the Group drives a human resource ("HR") strategy focused on fair remuneration and equal opportunities, training and development, employee wellness and engagement, and work-life harmony.

We are taking progressive steps to develop and implement policies and staff engagement programmes that aim to help employees build long-term and fulfilling careers with Sitra.

Employee relationship management is a process that the Group uses to effectively manage all interactions with employees, ultimately to achieve the goals of the organisation. Enhancing communication channels and motivation in employees are measures we take to build healthy employee relationship.

Our employees are provided with frequent management updates and adequate notice period regarding any operational changes. Engaging our employees in regular meetings and periodic announcements via emails are also part of our good employee relations culture.

The Group meets and complies with the relevant laws and regulations for manpower employment in the three key markets where we have direct business operations. In Singapore, the Group contributes to the Central Provident Fund Scheme and obtains medical benefits such as hospitalisation and surgical plans for all our employees. We provide maternity as well as paternity leave in accordance with the recommendations of the MOM.

Our recruitment policy is based on the pre-requisite skills and academic qualifications necessary to perform the required job scope. We have implemented stringent shortlisting process in the recruitment process to recruit candidates that share the same values as us. We understand the importance of talent retention by providing fair and sustainable financial and non-financial incentives and learning and development opportunities. We have in place employee share option scheme and performance share plan to incentivise our employees to achieve high performance. Our compensation and benefits policies are determined by guidelines proposed by our HR department and approved by the Remuneration Committee of our Board.

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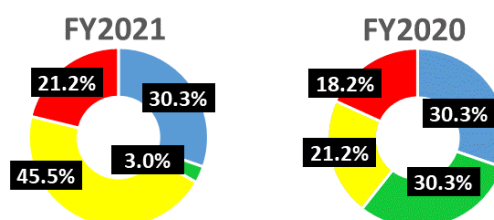
During the Reporting Period, all (FY2020: all) employees underwent annual performance review and received periodic performance feedbacks from their reporting managers.

Our business is highly dependent on senior experienced employees who have been in the wood-based products and lifestyle furniture businesses for over 20 years. Through the organic growth of complementary businesses over the years, we have also strengthened the retention of our pool of talented employees whose professional expertise and strong customer relationship has been critical in the sustainable success of our wood-based products and lifestyle furniture business.

As at 31 December 2021, 21.2% (FY2020: 18.2%) of our workforce have more than 20 years of service with us. In FY2021, the overall turnover rate is 17.1% (FY2020: 10.3%). We will continue to work towards improving our turnover rate.

Years of service

	FY2021	FY2020
● < 5 years	30.3%	30.3%
● 6 to 10 Years	3.0%	30.3%
● 11 to 20 Years	45.5%	21.2%
● > 20 Years	21.2%	18.2%



Turnover rate

	FY2021	FY2020
Turnover rate	17.1%	10.3%

Target for FY2021	Performance in FY2021	Target for FY2022
Drive employee development and employee engagement	<ul style="list-style-type: none"> All employees underwent annual performance review Increase in percentage of workforce who have more than 20 years of service with us Increase in turnover rate 	<ul style="list-style-type: none"> Maintain percentage of employees who received regular performance reviews Maintain or improve employee retention rate subject to market conditions

7.9 Data privacy and protection

Data privacy is of utmost importance to us as our business is required to handle, store and manage personal information pertaining to our customers and employees.

In Singapore, we are required to abide by the Personal Data Protection Act ("PDPA"), which comprises various rules governing collection, use, disclosure and care of personal information.

We adopt the following strategies to protect personal information:

Proactive management of personal data

In line with our commitment to data privacy, we have implemented the following measures:

- Set up internal policies and procedures requiring our employees to maintain strict confidentiality of personal information gathered in the course of our operations; and
- Selected executives are sent for external PDPA training to familiarise with the procedures to handle PDPA complaint.

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Implement cybersecurity measures to protect our data

To protect our proprietary platforms and safeguard personal information, our network is protected by security controls which include intrusion detection and protection measures such as antivirus software and firewalls.

During the Reporting Period, there is no reported substantiated complaints concerning breaches of data privacy and losses of personal data (FY2020: zero).

Target for FY2021	Performance in FY2021	Target for FY2022
Achieve compliance with all applicable laws and regulations	Maintained zero reported substantiated complaints concerning breaches of data privacy and losses of personal data	Maintain zero reported substantiated complaints concerning breaches of data privacy and losses of personal data

7.10 Ongoing community engagement

We strive not only to set a good example but also to encourage individuals and other corporations to embrace the spirit of giving. We recognise that long-term success of the business is closely related to the health and prosperity of the communities.

Society of St Vincent de Paul (“SSVP”) Singapore Wishing Tree Project

SSVP Singapore supports over 3,000 Friends-in-Need who are poor and vulnerable. Regardless of their race, nationality and religion, SSVP Singapore aims to bring them hope to lead resilient and dignified lives for a better future. The Friends-in-Need penned down their wishes in the e-wishing tree platform and donors can reach out to them via donations of items, volunteers and prayers. During the Reporting Period, we donated several electrical appliances to the Friends-in-Need.



Sole4Souls Shoe Collection Campaign

Sitra Singapore supported the Soles4Souls movement in driving for the collection of pre-loved shoes for the needy children in developing economies.



Target for FY2021	Performance in FY2021	Target for FY2022
Support more community programmes	Initiate community engagement campaign	Continue with existing community engagement campaign

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7.11 Compliance with corporate governance

Corporate governance is essential to embedding sustainability into the heart of Sitra. Corporate governance is about leadership, it sets the parameters in decision making with accountability, transparency, responsibility and ethical behaviour. Sitra's governance practices translate the culture behind which decisions are taken in our Company.

Our approach is to weave sustainability throughout our governance structure, thus enabling Sitra to consistently deliver value to our customers and stakeholders, impacting our return on investment, growth and risk management opportunities.

The Group is proactive in ensuring compliance with relevant laws and regulations. Our management team is responsible for the review and monitoring of the Group's policies and practices in respect to legal and regulatory requirements across all operations. Any non-compliance of the relevant laws and regulations and the proposed resolutions will be reported to the Board of Directors.

The Group has put in place policies and procedures to ensure compliance with the relevant laws and regulations in all the jurisdictions we operate in. At a corporate level, we also ensure that we are in compliance, with the Listing Manual Section B Rules of Catalist of the SGX-ST, Securities and Futures Act and Singapore Companies Act.

We promote an ethical and act with integrity culture throughout the Group. We seek to conduct our business in an ethical manner and uphold best practices in the wood-based products and lifestyle furniture industry. All directors, operations and management staff are required to fully comply with our principles set out in our Employee Handbook and employment contract.

The Employee Handbook details our expected standards of employee's professional behaviour towards our business partners whom we have business dealings with, to the people in the society whom we serve, such as customers, and towards each other as employees of the Group. Above all, we are inculcated with strong corporate values to act with integrity.

We recognise the importance of risk management and how business risks may adversely affect Sitra's business performance. We have put in place an Enterprise Risk Management Framework ("**ERM Framework**") which governs the risk management process in the Group. We regularly review our business and operational activities to identify areas of significant business risks as well as appropriate measures to control and mitigate these risks.

While it is the responsibility of the Audit Committee, as delegated by the Board of Directors, to oversee the effectiveness of our risk management and internal controls, the core function of the internal audit is coordinated by our Chief Financial Officer who reports to the Audit Committee on a periodic basis.

During the Reporting Period, we have no reported incidents of non-compliance with the relevant legal and regulatory requirements (FY2020: none).

Target for FY2021	Performance in FY2021	Target for FY2022
Focus on risk management by having good corporate governance and well-developed policies and procedures	Maintained zero non-compliance of legal and regulatory requirements	Maintain zero non-compliance of legal and regulatory requirements

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7.12 Anti-corruption and anti-fraud

Sitra is committed to ethical and fair conduct, as well as the prohibition of corruption, including bribery and fraud. We strive to uphold these commitments by implementing the corporate best practices and adhering to the definitions and put forth guidelines.





The Group has a whistle-blowing policy where employees of the Group may, in confidence, raise concerns about possible improprieties in matters of financial reporting or other matters. The policy establishes a confidential line of communication for the report of issues/concerns to any one of the AC members and provides for the protection of those who raise a concern in good faith against harassment or victimization. The complainant's identity shall also be kept confidential to the extent reasonably practical within the limits of the law.

During the Reporting Period, zero incident of serious offence is reported through our whistle-blowing channel (FY2020: zero incident).

Target for FY2021	Performance in FY2021	Target for FY2022
Achieve applicable laws and regulations	Maintained zero incident of serious offence	Maintain zero incident of serious offence

8. SUPPORTING THE UN SUSTAINABLE DEVELOPMENT GOALS

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 SDGs, which form an urgent call for action by all countries – developed and developing – in a global partnership. We believe that everyone plays an important part in advancing sustainable development and to align our business objectives with the SDGs, we have identified the relevant SDGs which we can contribute to through our business practices, products and services. The SDGs that we focus on and the related Sustainability Factors are as follows:

SDG	Our effort
 <p>3 GOOD HEALTH AND WELL-BEING</p> <p>Ensure healthy lives and promote well-being for all at all ages</p>	<p><u>7.5 Employee health and safety</u></p> <p>We appoint safety officers, adopt an effective occupational health and safety approach to provide a hazard-free workplace for our employees and ensure the well-being of both our employees and the working environment.</p>
 <p>4 QUALITY EDUCATION</p> <p>Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all</p>	<p><u>7.7 Training and employee development</u></p> <p>We invest in training and development of our people to enhance our business competencies as well as overall productivity.</p>
 <p>6 CLEAN WATER AND SANITATION</p> <p>Ensure availability and sustainable management of water and sanitation for all</p>	<p><u>7.2 Water and energy conservation and emissions reduction</u></p> <p>We implement measures to monitor and reduce the utilisation of water resources which in turn help us to work towards achieving sustainable management and efficient use of natural resources.</p>
 <p>7 AFFORDABLE AND CLEAN ENERGY</p> <p>Ensure access to affordable, reliable, sustainable and modern energy for all</p>	<p><u>7.2 Water and energy conservation and emissions reduction</u></p> <p>We implement measures to monitor and reduce the utilisation of energy resources which in turn help us to improve our energy efficiency and reduce GHG emissions.</p>

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SDG		Our effort
	<p>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all</p>	<p><u>7.1 Sustainable business performance</u> We contribute to economic growth through creating long-term economic value for our shareholders.</p> <p><u>7.8 Employee relationship management</u> We are committed to enhance our employee engagement channels and motivate our employees with learning and development opportunities and employee benefits.</p>
	<p>Reduce inequality within and among countries</p>	<p><u>7.6 Diversity and equal opportunity</u> We ensure equal opportunity for all regardless of gender, age, nationality and skills.</p>
	<p>Make cities and human settlements inclusive, safe, resilient and sustainable</p>	<p><u>7.10 Ongoing community engagement</u> While we strive to achieve our business goals, we also believe in giving back to the society and serving our local communities to promote social inclusion and sustainable communities.</p>
	<p>Ensure sustainable consumption and production patterns</p>	<p><u>7.3 Supply chain management and product responsibility</u> We ensure that our suppliers are certified with relevant environmental certifications and criteria such as SVLK, FSC®, PEFC and PEFC Controlled Sources.</p> <p><u>7.4 Waste management</u> We contribute to the reduction of waste generation through recycling, reusing and reducing.</p>
	<p>Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</p>	<p><u>7.9 Data privacy and protection</u> We implement measures to protect personal data in accordance with the requirements of relevant data protection legislations.</p> <p><u>7.11 Compliance with corporate governance</u> We maintain a high standard of corporate governance to safeguard our shareholders' interest and maximise long-term shareholder value.</p> <p><u>7.12 Anti-corruption and anti-fraud</u> A whistle-blowing channel is in place to encourage the reporting of any corruption, misconduct and fraud and protect whistle-blowers against reprisals.</p>

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9. GRI CONTENT INDEX

GRI Standard & Disclosure Title		Section Reference	Page Reference
Organisational Profile			
102-1	Name of the organisation	<ul style="list-style-type: none"> Sustainability Report 2021 (“SR 21”) > Cover Page SR 21 > Corporate Profile 	– 2 – 3 of SR 21
102-2	Activities, brands, products, and services	SR 21 > Corporate Profile	2 – 3 of SR 21
102-3	Location of headquarters	<ul style="list-style-type: none"> Annual Report 2021 (“AR 21”) > Corporate Information AR 21 > Notes to the Financial Statements > General Information 	11 of AR 21 50 of AR 21
102-4	Location of operations	<ul style="list-style-type: none"> SR 21 > Corporate Profile SR 21 > Material Sustainability Factors > Sustainable Business Performance AR 21 > Notes to the Financial Statements > Investments in Subsidiary Corporations AR 21 > Notes to the Financial Statements > Segment Information 	2 – 3 of SR 21 9 of SR 21 69 – 72 of AR 21 95 – 96 of AR 21
102-5	Ownership and legal form	<ul style="list-style-type: none"> AR 21 > Notes to the Financial Statements > General Information AR 21 > Notes to the Financial Statements > Investments in Subsidiary Corporations AR 21 > Statistics of Shareholdings 	50 of AR 21 69 – 72 of AR 21 97 – 98 of AR 21
102-6	Markets served	<ul style="list-style-type: none"> SR 21 > Corporate Profile SR 21 > Material Sustainability Factors > Sustainable Business Performance AR 21 > Notes to the Financial Statements > Investments in Subsidiary Corporations AR 21 > Notes to the Financial Statements > Segment Information 	2 – 3 of SR 21 9 of SR 21 69 – 72 of AR 21 95 – 96 of AR 21
102-7	Scale of the organisation	<ul style="list-style-type: none"> SR 21 > Corporate Profile SR 21 > Material Sustainability Factors > Sustainable Business Performance SR 21 > Material Sustainability Factors > Diversity and Equal Opportunity AR 21 > Operations Review AR 21 > Consolidated Statement of Comprehensive Income AR 21 > Consolidated Statement of Financial Position AR 21 > Statement of Financial Position 	2 – 3 of SR 21 9 of SR 21 13 of SR 21 5 – 6 of AR 21 44 of AR 21 45 of AR 21 46 of AR 21
102-8	Information on employees and other workers	SR 21 > Material Sustainability Factors > Diversity and Equal Opportunity	13 of SR 21
102-9	Supply chain	<ul style="list-style-type: none"> SR 21 > Corporate Profile SR 21 > Material Sustainability Factors > Supply Chain Management and Product Responsibility 	2 – 3 of SR 21 11 of SR 21
102-10	Significant changes to the organisation and its supply chain	There were no significant changes to the organisation and its supply chain during the Reporting Period	-
102-11	Precautionary Principle or approach	None	-
102-12	External initiatives	SR 21 > Supporting the UN Sustainable Development Goals	18 – 19 of SR 21
102-13	Membership of associations	None	-
Strategy			
102-14	Statement from senior decision-maker	<ul style="list-style-type: none"> SR 21 > Board Statement AR 21 > Chairman’s Statement 	1 – 2 of SR 21 4 of AR 21

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GRI Standard & Disclosure Title		Section Reference	Page Reference
Ethics and Integrity			
102-16	Values, principles, standards, and norms of behaviour	<ul style="list-style-type: none"> SR 21 > Material Sustainability Factors > Compliance with Corporate Governance SR 21 > Material Sustainability Factors > Anti-corruption and Anti-fraud AR 21 > Corporate Governance Report 	17 of SR 21 18 of SR 21 12 – 36 of AR 21
Governance			
102-18	Governance structure	<ul style="list-style-type: none"> SR 21 > Policy, Practice and Performance Reporting > Reporting Structure AR 21 > Corporate Governance Report 	5 – 6 of SR 21 12 – 36 of AR 21
Stakeholder Engagement			
102-40	List of stakeholder groups	SR 21 > Stakeholder Engagement	4 – 5 of SR 21
102-41	Collective bargaining agreements	None of our employees are covered by collective bargaining agreements	–
102-42	Identifying and selecting stakeholders	SR 21 > Stakeholder Engagement	4 – 5 of SR 21
102-43	Approach to stakeholder engagement	SR 21 > Stakeholder Engagement	4 – 5 of SR 21
102-44	Key topics and concerns raised	SR 21 > Stakeholder Engagement	4 – 5 of SR 21
Reporting Practice			
102-45	Entities included in the consolidated financial statements	AR 21 > Notes to the Financial Statements > Investments in Subsidiary Corporations	69 – 72 of AR 21
102-46	Defining report content and topic Boundaries	SR 21 > Policy, Practice and Performance Reporting > Sustainability Reporting Process	6 of SR 21
102-47	List of material topics	SR 21 > Material Sustainability Factors	7 – 18 of SR 21
102-48	Restatements of information	There are some minor restatements of the following: <ul style="list-style-type: none"> SR 21 > Material Sustainability Factors > Employee Relationship Management 	14 – 15 of SR 21
102-49	Changes in reporting	Sustainability factors removed: <ul style="list-style-type: none"> Wages and Local Hiring Business Partner Engagement Stakeholder Engagement The above-mentioned factors have been removed based on a materiality assessment performed with the senior management. We will continue to monitor the relevance and materiality of these factors based on internal and external developments and disclose on these factors if applicable.	–
102-50	Reporting period	SR 21 > Reporting Period and Scope	4 of SR 21
102-51	Date of most recent report	Sustainability Report 2020	–
102-52	Reporting cycle	SR 21 > Reporting Period and Scope	4 of SR 21
102-53	Contact point for questions regarding the report	None	-
102-54	Claims of reporting in accordance with the GRI Standards	<ul style="list-style-type: none"> SR 21 > Reporting Framework SR 21 > GRI Content Index 	4 of SR 21 20 – 22 of SR 21
102-55	GRI content index	SR 21 > GRI Content Index	20 – 22 of SR 21
102-56	External assurance	SR 21 > Reporting Framework	4 of SR 21
Management Approach			
103-1	Explanation of the material topic and its Boundary	SR 21 > Material Sustainability Factors	7 – 18 of SR 21
103-2	The management approach and its components	<ul style="list-style-type: none"> SR 21 > Board Statement SR 21 > Policy, Practice and Performance Reporting SR 21 > Material Sustainability Factors 	1 – 2 of SR 21 5 – 7 of SR 21 7 – 18 of SR 21
103-3	Evaluation of the management approach	SR 21 > Material Sustainability Factors	7 – 18 of SR 21

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GRI Standard & Disclosure Title		Section Reference	Page Reference
Category: Economic			
201-1	Direct economic value generated and distributed	<ul style="list-style-type: none"> SR 21 > Material Sustainability Factors > Sustainable Business Performance AR 21 > Operations Review AR 21 > Consolidated Statement of Comprehensive Income AR 21 > Consolidated Statement of Financial Position AR 21 > Statement of Financial Position 	9 of SR 21 5 – 6 of AR 21 44 of AR 21 45 of AR 21 46 of AR 21
205-3	Confirmed incidents of corruption and actions taken	SR 21 > Material Sustainability Factors > Anti-corruption and Anti-fraud	18 of SR 21
Category: Environmental			
302-1	Energy consumption within the organisation	SR 21 > Material Sustainability Factors > Water and Energy Conservation and Emissions Reduction	9 – 10 of SR 21
302-3	Energy intensity	SR 21 > Material Sustainability Factors > Water and Energy Conservation and Emissions Reduction	9 – 10 of SR 21
303-5	Water consumption	SR 21 > Material Sustainability Factors > Water and Energy Conservation and Emissions Reduction	9 – 10 of SR 21
305-1	Direct (Scope 1) GHG emissions	SR 21 > Material Sustainability Factors > Water and Energy Conservation and Emissions Reduction	9 – 10 of SR 21
305-2	Energy indirect (Scope 2) GHG emissions	SR 21 > Material Sustainability Factors > Water and Energy Conservation and Emissions Reduction	9 – 10 of SR 21
305-4	GHG emissions intensity	SR 21 > Material Sustainability Factors > Water and Energy Conservation and Emissions Reduction	9 – 10 of SR 21
306-2	Management of significant waste-related impacts	SR 21 > Material Sustainability Factors > Waste Management	11 – 12 of SR 21
308-1	New suppliers that were screened using environmental criteria	SR 21 > Material Sustainability Factors > Supply Chain Management and Product Responsibility	11 of SR 21
Category: Social			
401-1	New employee hires and employee turnover	SR 21 > Material Sustainability Factors > Employee Relationship Management	14 – 15 of SR 21
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	SR 21 > Material Sustainability Factors > Employee Relationship Management	14 – 15 of SR 21
401-3	Parental leave	SR 21 > Material Sustainability Factors > Employee Relationship Management	14 – 15 of SR 21
403-9	Work-related injuries	SR 21 > Material Sustainability Factors > Employee Health and Safety	12 of SR 21
403-10	Work-related ill health	SR 21 > Material Sustainability Factors > Employee Health and Safety	12 of SR 21
404-1	Average hours of training per year per employee	SR 21 > Material Sustainability Factors > Training and Employee Development	14 of SR 21
404-2	Programs for upgrading employee skills and transition assistance programs	SR 21 > Material Sustainability Factors > Training and Employee Development	14 of SR 21
404-3	Percentage of employees receiving regular performance and career development reviews	SR 21 > Material Sustainability Factors > Employee Relationship Management	14 – 15 of SR 21
405-1	Diversity of governance bodies and employees	SR 21 > Material Sustainability Factors > Diversity and Equal Opportunity	13 of SR 21
406-1	Incidents of discrimination and corrective actions taken	SR 21 > Material Sustainability Factors > Diversity and Equal Opportunity	13 of SR 21
413-1	Operations with local community engagement, impact assessments, and development programs	SR 21 > Material Sustainability Factors > Ongoing Community Engagement	16 of SR 21
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	SR 21 > Material Sustainability Factors > Data Privacy and Protection	15 – 16 of SR 21



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