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INTRODUCTION

About This Report
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The StarHub Board of Directors (the Board) is pleased to present StarHub's Sustainability Report 2020. This is our 10th annual sustainability report, marking a decade of our Green journey. Through this report, we provide an account of our commitments, performance and progress on integrating sustainability practices across our operations.

The ongoing COVID-19 global pandemic has impacted our society in unprecedented ways. Despite the challenges, it has made us more aware as a society, focused on sustainability, diversity, well-being, and pursuing aspirations in a way that is seamless and digital. As a result of the pandemic, we have redirected our sustainability efforts in 2020 to address the issues faced by our employees, customers and communities.

Our efforts in sustainability have been recognised locally and internationally. We are honoured to be ranked Asia's most sustainable telecommunications company and 80th globally in 2021 by Corporate Knights Global 100, based on our performance on Environmental, Social and Governance (ESG) criteria.

As a signatory to the United Nations (UN) Global Compact, we are committed to the Ten Principles of the UN Global Compact.

Reporting Scope And Boundary
102-46, 102-50

The information in this report covers all our business units, StarHub Shops (excluding Exclusive Partners unless otherwise stated), data centres, subsidiaries and associated companies (excluding Ensign InfoSecurity Pte. Ltd. and Strateq Sdn. Bhd. – new subsidiaries acquired in 2018 and 2020 respectively), during our financial year 2020 (1 January to 31 December 2020).

Reporting framework
102-54

This report is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option, which is the most widely used reporting framework that is applicable to StarHub's business operations. The GRI content index can be found on pages 169 to 172.

For the first time, we have included relevant disclosures recommended by the Sustainability Accounting Standard Board (SASB) based on the Telecommunications Services (Industry Standard, Version 2018-10). Our SASB Disclosure Index can be found on pages 173 to174.

This report also adheres to the Singapore Exchange Securities Trading Limited (SGX-ST) Listing Rule 711A on preparing an annual sustainability report and describes our sustainability practices with reference to the primary components set out in SGX-ST Listing Rule 711B.

External Assurance
102-56

StarHub has sought an independent, limited assurance for a selection of our key ESG disclosures in this report to provide our readers with greater confidence on the accuracy of the information included. Please go to pages 165 to 168 for the assurance statement and scope of data assured.

Feedback
102-53

We welcome your comments and feedback on how we can continue to progress on our sustainability journey. Please contact us at: ir@starhub.com.

Significant Achievements

Ranked **Asia's Most Sustainable Telecommunications Company** and **80**th position globally in **2021 Corporate Knights Global 100**

SINGAPORE APEX CORPORATE SUSTAINABILITY AWARDS 2020

Sustainable Business winner at the Singapore Apex Corporate Sustainability Awards 2020

CDP DISCLOSER **2020**

Leadership score of A- in CDP's Climate Change Disclosure

Secured StarHub's **first sustainability-linked loan** - RM270 million for 3 years

FTSE4Good

Included in **FTSE4Good Index Series**

MSCI ESG RATINGS AA

CCC | B | BB | BBB | A | AA | AAA

Rated 'AA' by **MSCI** for ESG rating

ASEAN Corporate Governance Scorecard Award for ASEAN Asset Class at ASEAN Capital Markets Forum 2019

Ranked 9th **out of 704** SGX-listed companies in the inaugural **Singapore Board Diversity Index 2020**

Ranked 38th out of **577 companies** in the **Singapore Governance and Transparency Index 2020**

Ranked 7th in the top 10 advertisements of the inaugural **R3-AWARE AdvertisHER Study**

SUSTAINABILITY REPORT

FY2020 Performance Highlights

Protecting the Environment	Enabling a Digital Society	Caring for Our People & Communities
18% reduction in direct fuel consumption from non-renewable sources	**First in Singapore** to launch **5G services** for customers with our technology partner Nokia	**16,857 hours** of training provided to our employees, reaching **77%** of our workforce
5% reduction in energy consumption		**25%** of Board members are **female** and **43%** of our workforce are **female**
4.6% of energy procured from **renewable** sources	**Highest-ever customer satisfaction scores** for StarHub's Mobile and TV services according to the Customer Satisfaction Index of Singapore (CSISG) 2020 national study on the info-communications sector, conducted by the Institute of Service Excellence	**COMMUNITY CHEST AWARDS** ★ **Community Spirit Gold Award** ★ **Charity Gold Award**
8.7% reduction in greenhouse gas (GHG) emissions		
171 tonnes of **electronic waste (e-waste)** collected through RENEW	Attained Infocomm Media Development Authority's (IMDA) **Data Protection Trustmark Certification**	**PEOPLE'S ASSOCIATION COMMUNITY SPIRIT AWARDS** ★ **Community Partnership Excellence Award**
	Delivered the **fastest median throughputs** on 4G and 3G networks, as reported in IMDA's IMconnected H1 2020 report	Raised and distributed over **$1M** through **StarHub Cares COVID-19 Fund**
		Contributed an additional **$730,000** to seven voluntary welfare organisations (VWOs) and non-profit organisations (NPOs)
		Reached over **8,000** beneficiaries through StarHub's corporate social responsibility (CSR) programmes

Sustainability at StarHub

At StarHub, our ambition is to create a better world enabled by digital solutions, while caring for people and our planet. Technology and digitalisation are driving rapid and unprecedented changes that are altering the way we live, work and interact. As an Infocomm company, StarHub is at the forefront of these changes. We are in a unique position to leverage our capabilities to provide solutions that connect people and create value in society. At the same time, we realise that the increasing digitalisation of our lives creates concerns such as cybersecurity, data privacy and digital well-being. It also increases our environmental impact due to the greater use of energy and the generation of more waste.

We are committed to placing sustainability at the heart of our business strategy to manage the potential associated social and environmental risks. This will enable us to better align our products and services to create long-term value for our business and our stakeholders.

In 2018, we embarked on a strategic transformation plan to integrate sustainability within our wider business strategy and objectives. As part of this process, we redefined our sustainability framework this year to set clear and bold priorities that address the material ESG topics facing our business.

StarHub's Sustainability Framework

Sustainability Ambition: To create a better world enabled by digital solutions, while caring for people and our planet

Priority 1: **Protecting the Environment**	Priority 2: **Enabling a Digital Society**	Priority 3: **Caring for Our People & Communities**
Adopting energy-efficient measures, investing in renewable energy and building business resilience for our business against climate change. • Contributing to a circular economy by tackling e-waste, and responsibly managing our water and waste through reduction, reuse and recycling initiatives.	Innovating our products and services to provide seamless connectivity and digital solutions to our customers. • Safeguarding the well-being of online users, especially vulnerable groups.	Creating a safe, diverse and nurturing workplace, where employees can achieve their full potential. • Investing in our communities to support disadvantaged groups in the areas of digital inclusion and employability.
Material Topics: Energy and GHG Emissions Climate Change Adaptation Waste Management Water Use	**Material Topics:** Product and Service Quality Cybersecurity and Data Privacy Online Safety	**Material Topics:** Talent Management Workplace Equality, Diversity and Inclusion Employee Health and Safety Investing in Local Communities

Enabling Responsible Business Practices

Material Topics:

Business Conduct and Ethics	Public Health and Safety	Supply Chain Management	Responsible Marketing and Selling

This framework guides our approach to embedding sustainable business practices in every aspect of our business and creating long-term value for all stakeholders. It is underpinned by action plans, with key performance indicators and targets that drive continuous performance improvement. Tracking our progress against this framework forms the basis of this report, which is important for accountability and transparency.

Board Statement

The Board considers sustainability to be an integral part of StarHub's long-term strategic direction and is committed to responsible and sustainable practices across all our operations. The Board has the overall responsibility for overseeing the management and monitoring of material ESG topics across the business.

To assist the Board, our Board Risk Committee provides guidance to Management on our material sustainability topics and ensures the implementation of our sustainability strategy with our business objectives. As the COVID-19 pandemic continues to unfold, the Board Risk Committee reviewed potential ESG topics with consideration of the potential societal and business impacts of the pandemic. The topics were prioritised, as illustrated in the following section, to address impacts brought about by the pandemic.
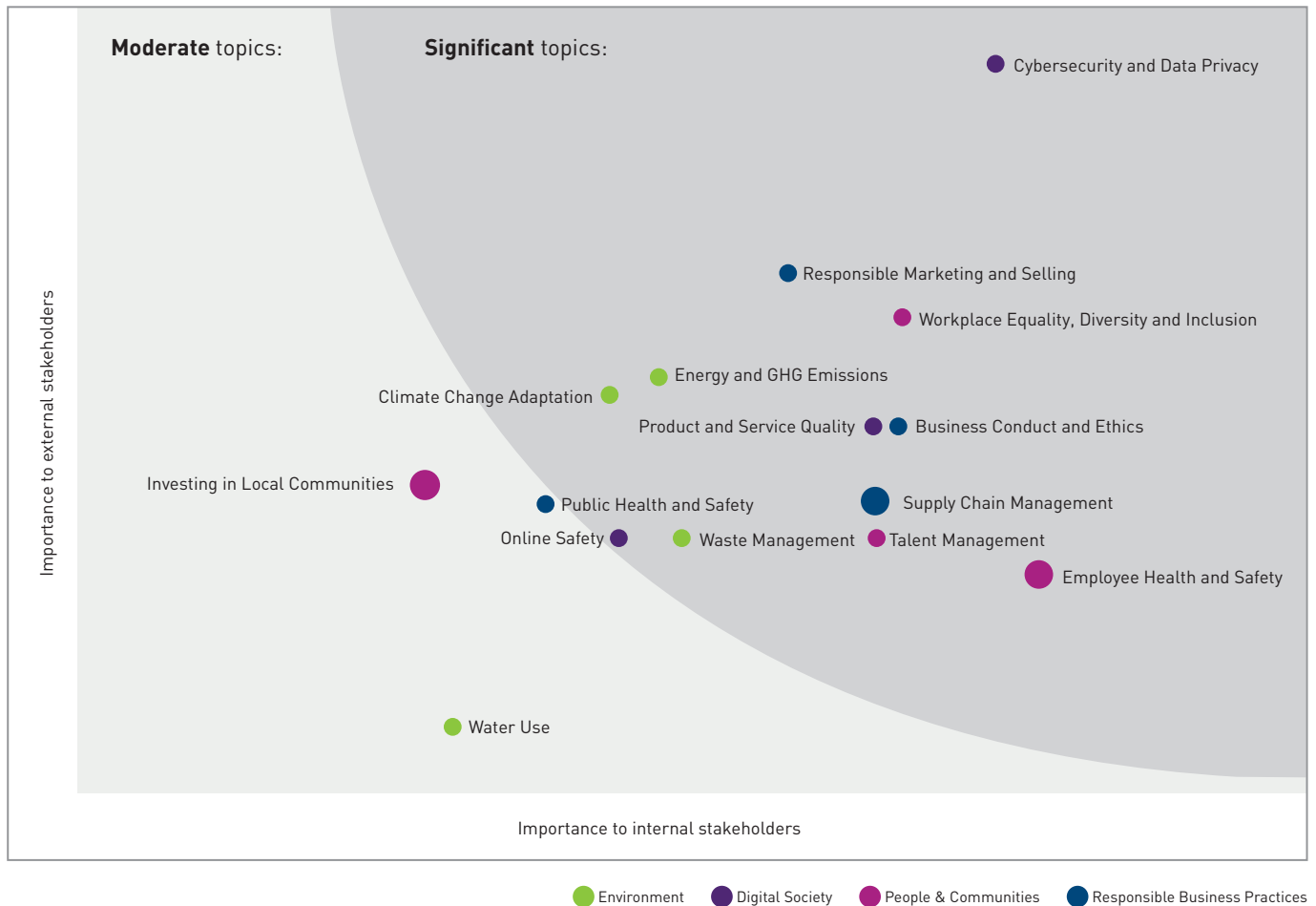
SUSTAINABILITY REPORT

Materiality

In 2019, we conducted a materiality assessment to ensure that our organisation continues to focus our efforts on the sustainability topics that are most important to the long-term success of our business and of the greatest significance to our stakeholders. For details on our approach to materiality, please see page 161.

This year, we reviewed our material sustainability topics taking into account stakeholder feedback, new sectoral trends, experts' views and our own business objectives. The sustainability topics that were identified as having increased importance as a result of the COVID-19 pandemic were Employee Health and Safety, Investing in Local Communities and Supply Chain Management. Greater emphasis was therefore placed on these areas in 2020. For more on our response to the COVID-19 pandemic, please see pages 136 - 137.

StarHub's Materiality Matrix

Significant topics: Topics that are most important to internal and external stakeholders. These form the focus of StarHub's sustainability strategy and reporting.

Moderate topics: Topics that are of relatively lower significance but still form part of StarHub's overall responsible business practices. These are managed and reported as part of our general sustainability approach.

Sustainability Governance

102-18, 102-19, 102-20

Sustainability Governance Structure

THE BOARD

Responsible for overseeing StarHub's overall sustainability efforts. Reviews and considers sustainability issues as part of its strategic formulation. This includes the determination, target-setting and monitoring of material ESG factors, as set out in this report.

1

2

BOARD RISK COMMITTEE

Provides guidance on sustainability topics to be identified as material to the business, and ensures the alignment and integration of our sustainability strategy and approach with our business practices.

3

MANAGEMENT RISK COMMITTEE

Comprises StarHub's Senior Leadership Team and is responsible for reviewing and determining material sustainability topics, developing our sustainability strategy and considering stakeholder feedback and expectations, as well as establishing priorities, goals and targets.

4

CORPORATE SUSTAINABILITY ADVOCATE FUNCTION

Responsible for developing, implementing and coordinating programmes and initiatives with the support of cross-functional representatives.

SUSTAINABILITY REPORT

Supporting the UN Sustainable Development Goals (SDGs)

Adopted by the UN General Assembly in 2015, the SDGs represent an ambitious global agenda to achieve a sustainable future by 2030. The SDGs are universal and countries are committed to sustainable development. StarHub is committed to playing our part to fulfil the global sustainable development agenda.

While our business will touch on all 17 interrelated SDGs, we have identified 11 goals which we believe we can make the largest impact through our core business operations, products and services, as well as leveraging our strengths to collaborate with others.

SDG	StarHub's Material ESG Topics	Efforts and initiatives
Goal 3 Ensure healthy lives and promoting well-being for all at all ages	• Employee Health and Safety • Public Health and Safety	• Employee care including work-from-home arrangement and various forms of support and engagement (pages 146 - 147) • Community healthcare support including staff blood donation drive, sponsorship of smartphones for real-time patient health telemonitoring at Community Care Facilities and free public health advisory SMS for HealthServe (page 136) • Built and contributed solar powered lamps to replace the use of toxic kerosene lamps by children in Cambodia under the World Wildlife Fund (WWF) Solar Light Challenge (pages 126 - 127) • Ensure strict compliance with radio frequency (RF) emissions and safety standards (page 153)
Goal 4 Supporting quality education as the foundation to improving people's lives and sustainable development	• Investing in Local Communities	• Provision of mobile broadband services and devices for underprivileged students during home-based learning (pages 134, 136) • Supported the Central Singapore CDC's Nurture Programme since 2011, to provide greater learning opportunities to the disadvantaged (page 151) • Built and contributed solar powered lamps to provide a better night time study environment for marginalised communities under the WWF Solar Light Challenge (pages 126 -127)
Goal 5 Achieve gender equality and empower all women and girls	• Workplace Equality, Diversity and Inclusion	• Adhere to the Tripartite Alliance for Fair Employment Practices (Tafep) guidelines, prohibiting any kind of discrimination in employment or transactions (page 143)
Goal 7 Improve access to clean energy	• Energy and GHG Emissions	• Raising the proportion of our renewable energy progressively to reach 10% by 2022 (pages 118, 123) • Built and contributed solar powered lamps under the WWF Solar Light Challenge to alleviate energy poverty in marginalised communities (pages 126 - 127)
Goal 8 Promote inclusive and sustainable economic growth by creating quality jobs for all	• Talent Management • Supply Chain Management	• Formalised Responsible Sourcing Policy basing on the Ten Principles of the UN Global Compact (pages 153 - 154) • Implemented Supplier Self-Assessment Questionnaire with high-risk suppliers (pages 153 - 154) • Implemented initiatives to enhance professional and personal skills development for all employees (pages 141 - 142)

SDG	StarHub's Material ESG Topics	Efforts and initiatives
Goal 9 Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation	• Online Safety • Cybersecurity and Data Privacy • Product and Service Quality	• Launched 5G services (page 132) • Obtained IMDA's Data Protection Trustmark (DPTM) Certification (page 139) • Delivered the fastest median throughputs on 4G and 3G networks (page 132) • Maintaining network resiliency (page 132)
Goal 10 Reduce inequality within and among countries	• Workplace Equality, Diversity and Inclusion • Investing in Local Communities • Supply Chain Management	• Adhere to Tafep guidelines, prohibiting any kind of discrimination in employment or transactions (page 143) • Supported Care Corner and Nurture programmes, bridging disadvantaged children and youths with greater learning opportunities (pages 150 - 151) • Formalised Responsible Sourcing Policy basing on the Ten Principles of the UN Global Compact (pages 153 - 154) • Supported the WWF Earth Hour and Solar Light Challenge to improve the lives of marginalised communities (pages 126 - 127)
Goal 11 Make cities and human settlements inclusive, safe, resilient and sustainable	• Product and Service Quality • Climate Change Adaptation • Waste Management	• Supported IMDA's Seniors Go Digital initiative via affordable mobile plans and packages to encourage digital adoption among lower-income seniors (page 135) • Provided mobile broadband services and devices for underprivileged students during home-based learning (pages 134, 136) • Reduce environmental impact through recycling of internal and public e-waste (pages 128 - 129)
Goal 12 Ensure sustainable consumption and production patterns	• Energy and GHG Emissions • Water Use • Waste Management • Supply Chain Management	• Implemented various energy reduction measures (page 122) • Use of water-efficient fittings (page 130) • Provide avenues for the recycling of e-waste through StarHub's RENEW Programme (page 128) • Recycle all e-waste generated within our operations (page 128) • Implemented paperless processes within our offices and retail stores, with the use of only Forest Stewardship Council (FSC)-certified office paper and carrier bags, where needed (page 129) • Promote sustainable procurement practices through the implementation of our Responsible Sourcing Policy (pages 153 - 154)
Goal 13 Take urgent action to combat climate change and its impacts	• Climate Change Adaptation • Energy and GHG Emissions	• Implemented energy efficiency measures and retrofitted our premises to reduce energy consumption (pages 122 - 123) • Reduce environmental impact through recycling of internal and public e-waste (page 128) • Built and contributed solar powered lamps under the WWF Solar Light Challenge, avoiding an estimated 15.5 tonnes CO_2e of GHG emissions over the next 10 years (page 127)
Goal 17 Strengthen the means of implementation and revitalise the global partnership for sustainable development	• Waste Management • Climate Change Adaptation • Investing in Local Communities	• Leading our flagship e-waste recycling programme in collaboration with partners from the private sector, government and the local community since 2012 (page 128) • Supported the Ministry of Education (MOE) to provide mobile broadband services and devices for underprivileged students during home-based learning (pages 134, 136) • Supported the WWF Earth Hour and Solar Light Challenge (pages 126 - 127) • Involvement in various associations as members and committee members (page 160)

SUSTAINABILITY REPORT

Targets and Performance

103-3

We have listed the five key targets forming the main approach of our sustainability strategy, followed by the targets we have set in relation to the other identified material ESG topics.

Material Topic	2020 Target	2020 Performance	2021 Target[1]	Target Achievement in 2020
Key Targets				
Energy and GHG Emissions (Renewable Energy)	Increase the proportion of our renewable energy use from 2% in 2019 to 4% in 2020	Increased the proportion of our renewable energy use to 4.6%	Increase the proportion of our renewable energy use from 0% in 2018 to 6% by 2021 and 10% by 2022	
Energy and GHG Emissions (Energy Efficiency)		Current technical centres have an average power usage effectiveness (PUE) ratio of 2.08	Achieve an average PUE ratio of 1.77 for our technical centres	New target
Supply Chain Management	• Formalise the Responsible Sourcing Policy • Implement the Supplier Self-Assessment Questionnaire to cover all our key suppliers with an annual spend of at least $1 million	• Formalised the Responsible Sourcing Policy • Implemented the Supplier Self-Assessment Questionnaire with 47 key high-risk suppliers with an annual spend of at least $1 million	Continue to follow up with other suppliers with an annual spend of at least $1 million, while simultaneously implementing the Supplier Self-Assessment Questionnaire as a form of pre-qualification for new suppliers	
Public Health and Safety	Maintain 100% compliance with relevant RF radiation safety standards set by local regulators	Achieved 100% compliance	Continue to maintain 100% compliance (ongoing)	
Investing in Local Communities	Enhancing our CSR with a focus on climate change, through employee engagement and working with our beneficiaries	• Invested a total of $1,438,628 in our communities, including community relief provided under the StarHub Cares COVID-19 Fund, reaching 7,882 beneficiaries • Avoided an estimated 15.5 tonnes of carbon emissions in the next 10 years	Continue to support CSR activities that engage our employees and work with our beneficiaries, with a focus on climate change (ongoing)	

1   Long-term targets with no end dates are indicated with (ongoing).

Material Topic	2020 Target	2020 Performance	2021 Target[1]	Target Achievement in 2020
Protecting the Environment				
Climate Change Adaptation	Ensure climate resilience through an annual review of flood-prone areas for all our network operations and facilities	Conducted an independent infrastructure audit which found no significant issues with the resiliency of our network operations and facilities	Continue to ensure climate resilience through an annual review of flood-prone areas for all our network operations and facilities (ongoing)	
Waste Management		Achieved 100% recycling of the e-waste within our operations	Recycle 100% of the e-waste within our operations (ongoing)	New target
E-waste	Maintaining e-waste collection of at least 174 tonnes through our RENEW programme	171 tonnes of e-waste collected, close to the target despite the COVID-19 movement restrictions	Continue to support e-waste collection for a smooth transition to the government's new regulated e-waste management system	Close to target
Water Use	Detect and manage leaks promptly to minimise water wastage	Achieved reduction in water consumption of at least 11% year-on-year since 2018. The 56% reduction observed in 2020 is mainly due to our work-from-home arrangement in response to the COVID-19 pandemic	Continue to detect and manage leaks promptly to minimise water wastage (ongoing)	
Enabling a Digital Society				
Product and Service Quality	Minimise instances of service disruption	Disruption to residential fibre broadband services in April 2020, and a previously unreported disruption to corporate internet leased line services in September 2019[2]	Strive to minimise instances of service disruption (ongoing)	1 incident with a fine
Cybersecurity and Data Privacy	Ensure strict compliance with local regulatory requirements pertaining to cybersecurity and data privacy	Three isolated incidents where personal data of three separate individuals were disclosed to the wrong party	Continue to ensure strict compliance with local regulatory requirements (ongoing)	3 incidents
Online Safety	Encourage and promote the appropriate and safe use of online technology	Continued to provide information to educate our employees and customers about online threats	Continue to encourage and promote the appropriate and safe use of online technology and cooperate with requests from government agencies (ongoing)	

2   Previously unreported as IMDA only concluded its investigation for this case in 2020.

SUSTAINABILITY REPORT

Material Topic	2020 Target	2020 Performance	2021 Target[1]	Target Achievement in 2020
Caring for Our People & Communities				
Talent Management	• 100% of identified high-potential talent to have development plans in place • Learning and development activities to reach at least 70% of our employees	• Individual development plans completed and put in place for 100% of identified high-potential talent • Achieved learning reach of 77%	• 100% of identified high-potential talent to be assigned development sponsors, to champion and support their development plans • Learning and development activities to reach at least 85% of our employees	
Workplace Equality, Diversity and Inclusion	Maintain zero reported incidents of discrimination	No reported incidents of discrimination	Continue to maintain zero reported incidents of discrimination (ongoing)	
Employee Health and Safety	Maintain zero work-related fatalities	Zero work-related fatalities	Maintain zero work-related fatalities (ongoing)	
Embedding Responsible Business Practices				
Business Conduct and Ethics	Ensure strict compliance with local legal and regulatory requirements pertaining to fraud, corruption and unethical actions	No incidents of non-compliance with local legal and regulatory requirements pertaining to fraud, corruption and unethical actions	Continue to ensure strict compliance with local legal and regulatory requirements pertaining to fraud, corruption and unethical actions (ongoing)	
Responsible Marketing and Selling	Maintain strict compliance with regulations and/or voluntary codes concerning marketing communications	No incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications	Continue to maintain strict compliance with regulations and/or voluntary codes concerning marketing communications (ongoing)	

PROTECTING THE ENVIRONMENT

Environmental issues, such as climate change and the amount of waste generated by society, continue to gain prominence on the global sustainability agenda and increasingly pose serious threats to businesses and communities. As a responsible organisation, StarHub is committed to reducing our environmental impact.

Our commitments are supported by our environmental strategy, which focuses on four key areas:

1

Energy and GHG Emissions
Striving for energy-efficient operations, while monitoring and implementing initiatives to reduce energy consumption.

2

Climate Change Adaptation
Adopting solutions to combat climate change and protect the environment.

3

Waste Management
Tackling waste by implementing paperless processes and encouraging recycling.

4

Water Use
Investing in solutions to reduce water consumption across our operations.

SUSTAINABILITY REPORT

Energy and GHG Emissions

103-1, 103-2, 103-3, 302-1, 302-2, 302-3, 302-4, 305-1, 305-2, 305-3, 305-4, TC-TL-130a.1

Singapore announced a new national target in 2020, to halve its 2030 peak GHG emissions by 2050 and to achieve net-zero emissions in the second half of the century. A carbon tax was introduced in 2019 for large direct emitters, which indirectly led to an increase in our energy costs. To ensure the resiliency of our business against climate risks and its regulatory impact, it is imperative that we put in place innovative and adequate measures to increase our energy efficiency and reduce our GHG emissions.

Our technical centres, including our data centres and base stations, contribute to the majority of our energy consumption as they form part of our

Energy-saving cold-aisle containment implemented at our Technical Centres

key infrastructure which support our products and services.

As the increasing demand for data leads to higher energy consumption, we are focusing on operating our technical centres in an energy-efficient manner and adopting energy-efficient technologies. Measures implemented include temperature optimisation to

keep our data centres' temperature at 24°C where possible and improving airflow with the use of aisle containment and blanking panels to reduce cooling requirements. With these measures in place, we achieved an estimated overall reduction of 1.6% in energy consumption.

Main Energy Reduction Measures in 2020

Energy Reduction Measures	Sites/Facilities	Estimated Savings[3]	Estimated Avoided Emissions

Temperature Optimisation[4]	• Regional Centres
	• StarHub Data Centres
	  – SHDC@TaiSeng - NC CO1
	  – SHDC@Yishun - NC CO2
	  – SHDC@One-North MediaHub - CO4
	  – SHDC@Tai Seng - CO2 (partial)
	  – SHDC@Kaki Bukit - CO3 (partial)
		1,809,069 kWh/year or $217,088/year	739 tonnes CO_2e/year

Cyclical replacement of computer room air conditioning units	SHDC@Tai Seng – CO2	401,471 kWh/year or $48,176/year	164 tonnes CO_2e/year
Cyclical replacement of uninterruptible power supply	SHDC@Tai Seng - CO2	81,760 kWh/year or $9,811/year	33 tonnes CO_2e/year
Switching to LED	SHDC@Yishun - NC CO2	59,691 kWh/year or $7,163/year	24 tonnes CO_2e/year
Total		**2,351,991 kWh/year or $282,238/year**	**960 tonnes CO_2e/year**

3   Savings are estimated based on technical specifications and an average tariff rate of $0.12/kWh.
4   Assuming a 3% reduction in power consumption for every degree increase in cooling temperatures, based on the American Society for Heating, Refrigerating and Air-conditioning Engineers' (ASHRAE) temperature recommendations published in 2009 (Data Center Knowledge, 2009).

StarHub Hyperscale Data Centre @ Loyang in the AirTrunk SGP1 campus

In 2020, with the purchase of 6,400 MWh (23,040 gigajoules) of Renewable Energy Certificates (RECs), we increased the proportion of our renewable energy use to 4.6%. We are on track to progressively increase the proportion of our renewable energy use to 10% by 2022.

This year, we launched our new StarHub Data Centre @ Loyang – a state-of-the-art hyperscale facility which is built according to the industry's highest certified standards. It is designed with a low PUE ratio of 1.6 and uses indirect evaporative cooling, which contributes to higher energy efficiency compared to conventional data centres.

We have been monitoring our environmental performance to manage our resources and facilitate better decision-making. We managed to substantially reduce our direct energy consumption from our backup generators and transport fleet by 18%, from 5,740 gigajoules in 2019 to 4,695 gigajoules in 2020. We also observed an overall year-on-year[5] reduction of 5% in our energy consumption. Due to the impact of the COVID-19 pandemic, we are not able to accurately attribute the reduction to any specific causes – this could be due to a combination of the energy efficiency measures that we have implemented, the migration and consolidation of several of our legacy sites to make way for newer technologies, as well as the change in our customers' behaviour. Together with our purchase of RECs, we achieved an overall carbon emissions reduction of 8.7% (Scope 1 and Scope 2 combined) compared to 2019.

5   Year-on-year energy reduction is used for comparison of the energy used for delivering similar products and services.

SUSTAINABILITY REPORT

Fuel Consumption
(gigajoules)

	Stationary Diesel	Mobile Diesel	Mobile Petrol	Total
FY2020	548	3,710	437	4,695
FY2019	740	3,746	1,290	5,740
FY2018	1,149	3,823	2,498	7,470

■ Stationary Diesel ■ Mobile Diesel ■ Mobile Petrol
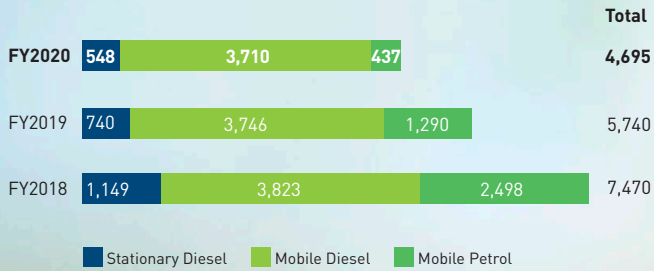
Electricity Use
(gigajoules)

	Within Organisation	Outside Organisation	Total
FY2020	493,064	1,301	494,365
FY2019	517,958	1,722	519,680
FY2018	508,292	1,542	509,834

■ Within Organisation ■ Outside Organisation

Energy Consumption
(gigajoules)

	Electricity	Solar REC	Fuel	Total
FY2020	471,325	23,040	4,695	499,060
FY2019	509,420	10,260	5,740	525,420
FY2018	509,834		7,470	517,304

■ Electricity ■ Solar REC ■ Fuel

GHG Emissions by Scope

64,095 tonnes CO_2e

- Scope 3 13.5%
- Scope 1 3.3%
- Scope 2 83.2%
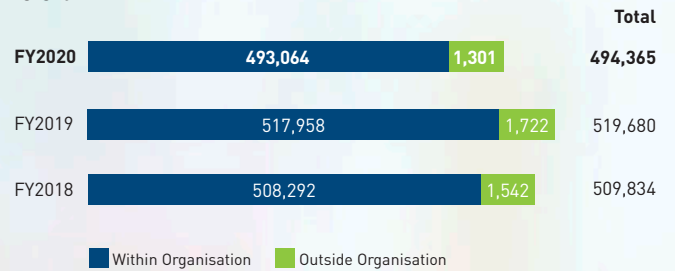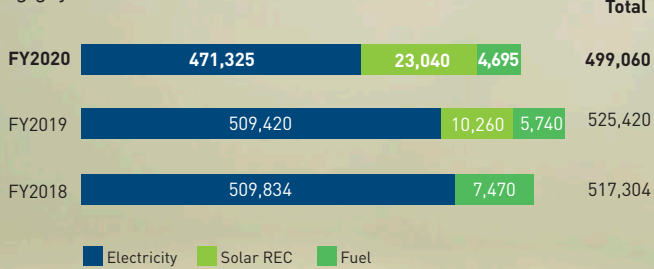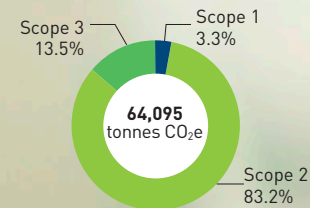
Direct GHG Emissions by Gas Type
(Scope 1)

2,103 tonnes CO_2e

- CO_2 15.4%
- CH_4 0.01%
- N_2O 0.19%
- HFCs 84.4%
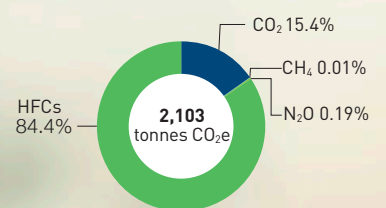
Energy Intensity
(gigajoules per $million revenue)

FY2020	246
FY2019	225
FY2018	219
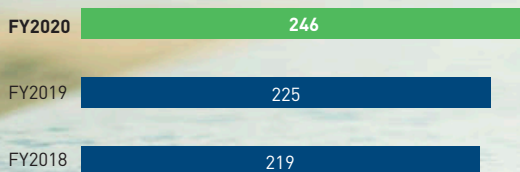
GHG Emissions Intensity[6]
(tonnes CO_2e per $million revenue)

FY2020	27.3
FY2019	26.1
FY2018	26.0
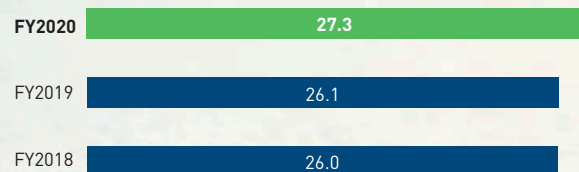
6   Data for 2018 and 2019 are restated based on total emissions for Scope 1 and 2 only. The Intensity values are calculated based on the revenue figures in Singapore dollars rounded to the nearest million.

GHG emission Source[7]

Scope 1	2020	2019	2018
Stationary combustion (tonnes CO_2e)	38	49	81
Mobile combustion (tonnes CO_2e)	290	349	436
Fugitive emissions - refrigerant gases (tonnes CO_2e)	1,775	1,290	1,721
Total Scope 1 Emissions (tonnes CO_2e)	**2,103**	**1,688**	**2,238**
Scope 2[8]			
Purchased electricity (tonnes CO_2e)	53,335	59,062	59,188
Total Scope 2 Emissions (tonnes CO_2e)	**53,335**	**59,062**	**59,188**
Total Scope 1 + 2 Emissions (tonnes CO_2e)[9]	**55,438**	**60,750**	**61,426**
Scope 3			
Electricity consumption by Exclusive Partners (tonnes CO_2e)	148	201	179
Employee business travel - air (tonnes CO_2e)	8	112	111
Employee Commute (tonnes CO_2e)[10]	372	983	1,108
Fuel and energy related (tonnes CO_2e)	8,130	8,541	8,407
Total Scope 3 Emissions (tonnes CO_2e)[11]	**8,658**	**9,836**	**9,805**
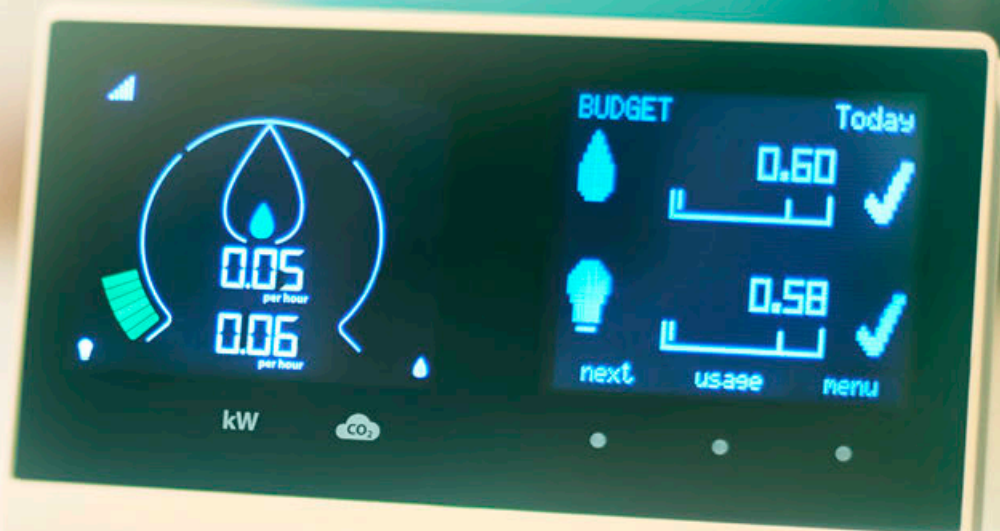
7   All GHG emissions are calculated in accordance with the GHG Protocol. The CO_2 equivalent emissions for fossil fuel, refrigerant sources and employee commute are calculated based on the United Kingdom Greenhouse Gas Inventory that is compiled according to the Intergovernmental Panel on Climate Change (2006) Guidelines. Emissions for electricity purchased is calculated based on the 2019 emissions factor published in the Singapore Energy Statistics 2020 by the Energy Market Authority. Emissions for air travel is reported based on estimations by ICAO. Operational control has been selected as the reporting boundary.
8   Scope 2 emissions are reported using the market-based reporting method, taking into account our purchase of 6,400 MWh of REC, which lowered our emissions by 2,614 tonnes CO_2e. The location-based Scope 2 emissions for 2020 was 55,949 tonnes CO_2e.
9   Overall emissions intensities for 2019 and 2018 are restated to include only Scope 1 and 2 emissions.
10   Estimated based on a survey conducted in 2020 on 2019 and 2020 travel patterns of 339 valid responses and the respective year-end headcount, taking into account 11 days of public holidays (PH) in 2018 and 2019, 12 days of PH in 2020 and 18 days of annual leave taken per employee. The estimated 2018 emissions provided based on 2019 survey results is given for indicative purposes only.
11   Total Scope 3 emissions for 2018 and 2019 have been restated to include employee commute and fuel and energy related emissions.

SUSTAINABILITY REPORT

Climate Change Adaptation
103-1, 103-2, 103-3, TC-TL-550a.2

As a low-lying island state, Singapore is vulnerable to the effects of climate change, including rising sea levels and floods from intense storms, which can impact our operational continuity. As a result, StarHub must ensure the resiliency of our business against the physical risks of climate change.

Last year, we established our Climate Risk Framework by including an annual review of our facilities against the list of flood-prone areas, as part of our Facility Management Policy. Through the review, appropriate control measures can be implemented to mitigate our physical risks. An independent infrastructure audit conducted in 2019 found no significant issues with the resiliency of our network, operations and facilities. StarHub is also ISO 22301:2012 certified, which fulfils the requirements for Business Continuity Management controls, including measures to improve climate change adaptation.

WWF Solar Light assembly session by Team Corporate Services over video conference

SOLAR LIGHT CHALLENGE

StarHub has been a staunch supporter of the WWF Earth Hour since 2013 and an official media partner since 2016, providing free TV airtime to help WWF Singapore raise awareness about Earth Hour. In 2020, apart from being a media partner, StarHub collaborated with WWF in their SolarBuddy Solar Light Challenge.

Our employees volunteered their time to assemble 100 solar powered lights to benefit children from marginalised communities in Cambodia who do not have access to electricity. The solar lights will replace the use of toxic kerosene lamps, enabling the children and their families to study and travel safely at night. This will improve their livelihoods, alleviate energy poverty and reduce GHG emissions. Through the volunteering session, our employees learnt about the challenges that we are facing globally, and ways in which they can contribute to mitigating the impact of climate change.

> **789 million people across the world do not have access to electricity. That equates to 1 in 10 people living in the dark.**
>
> – WWF

IMPACTS OF THE 100 SOLAR LIGHTS BUILT[12]

Positively Impacted
500 lives

**219,000
Study Hours**
created over 3 years

Reduced Kerosene
Expenditure by
80%

15.5 tonnes CO_2e
Carbon emissions offset
over lifespan
of the light

WWF Solar Light assembly session by Team Digital, conducted in small groups in compliance with social distancing measures.

12   Figures obtained from WWF Solar Light Challenge Event Impact Report.
Photo Credits: Solarbuddy / WWF Solar Light Challenge

SUSTAINABILITY REPORT

Waste Management
103-1, 103-2, 103-3, 306-2,
TC-TL-440a.1

Since the launch of our flagship e-waste recycling programme, RENEW, in 2012, we have cumulatively collected more than 660 tonnes of e-waste for recycling. In 2019, we achieved our 2022 collection target of 125 tonnes, three years ahead of the targeted date. Notwithstanding the movement control measures implemented by the government due to the COVID-19 pandemic, we managed to collect 171 tonnes of e-waste in 2020, which is very close to our target of 174 tonnes.

StarHub RENEW e-waste recycling bins

In view of the commencement of the government's new regulated e-waste management system in July 2021, StarHub's RENEW programme will gradually draw to a close by June 2021. Thereafter, StarHub will fulfil our obligations as a retailer to provide one-for-one take-back of regulated products and in-store collection of e-waste.

StarHub handles and disposes electronic equipment and devices daily as part of our services. In 2020, we generated 49 tonnes of e-waste from our operations. The lower amount of e-waste generated is primarily due to the reduction in our on-site business activities as a result of the COVID-19 pandemic. Guided by our Housekeeping Safe Work Procedure, we remain committed to recycling 100% of the e-waste generated within our operations through licensed e-waste contractors.

StarHub also aims to reduce the use of materials and the generation of other non-hazardous waste. To cut down on our paper consumption, we have previously limited the number of printed copies of our annual reports and Extraordinary General Meeting circulars. For this year's annual report and Extraordinary General Meeting circulars, StarHub has gone fully digital in line with the SGX-ST's guidance, which allows us to be more sustainable and progressive.

Hazardous E-Waste Generated and Recycled
(tonnes)

FY2020	49
FY2019	387
FY2018	213
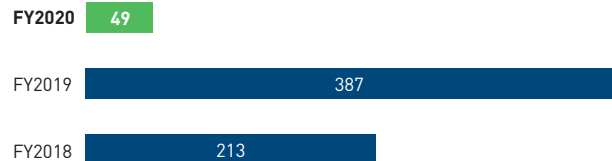
Non-Hazardous Waste Generated
(tonnes)

	Waste-to-energy incineration plants[13]	Paper recycled	Total
FY2020	17.6	1.8	19.4
FY2019	35	9	44
FY2018	46	18	64

■ Waste-to-energy incineration plants[13]   ■ Paper recycled
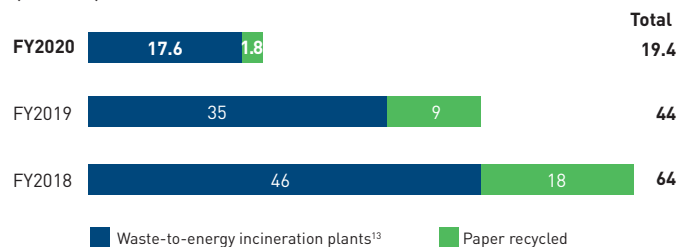
13 The amount of non-hazardous waste reported includes only general waste from our offices at StarHub Green and Nobel where the quantities of waste disposed through waste-to-energy incineration plants are the most substantial.

The top five items recycled through RENEW in 2020 are:

🔌	Cables	**19 tonnes**
💻	Laptops	**15 tonnes**
📶	Modems/ Routers	**10 tonnes**
📱	Mobile phones	**3 tonnes**
🖥️	CPU Computers	**3 tonnes**

RENEW – Amount of public e-waste collected and recycled
(tonnes)

FY2020	171.2
FY2019	174.3
FY2018	126.7
FY2017	92.7
FY2016	58.8
FY2015	31.7
FY2014	8.7
FY2013	6.6
FY2012	2.7
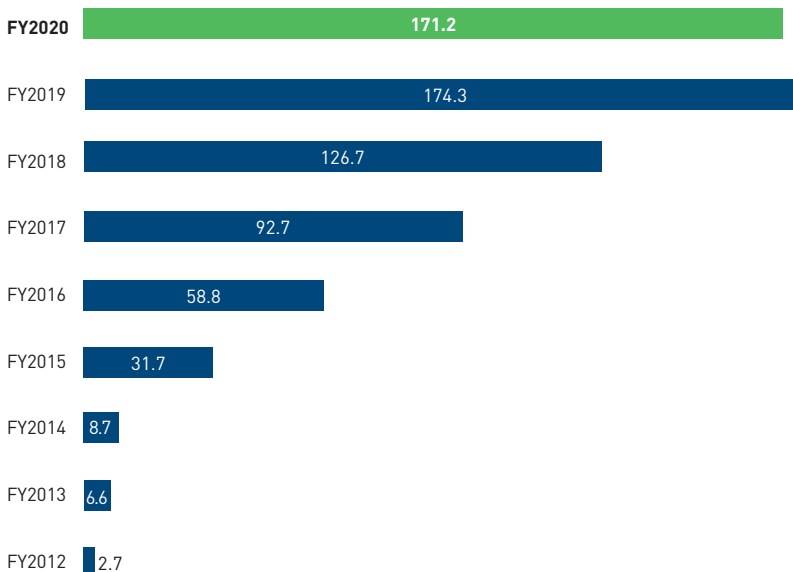
In an effort to go green and align with the Smart Nation vision, all our customers receive electronic bills by default. A monthly fee of $2.68 per billing account will apply if a customer opts to receive paper bills (with the exception of those aged 60 and above). Amounts collected are used for our StarHub Sparks Fund to support our CSR and sustainability efforts. We have also implemented paperless processes at our retail stores, including the use of electronic redemption vouchers and sales agreements, in a bid to reduce paper consumption and improve customer experience.

To reduce packaging waste, we implemented the 'Skip the Bag' initiative across all our shops, where customers are encouraged not to take a carrier bag and to 'Go Green with StarHub'. E-posters and tent cards are displayed in our shops to raise awareness of the initiative.

In 2020, we proactively transitioned from non-woven bags to FSC-certified biodegradable brown paper bags at our stores. While paper has the lowest carbon footprint for bag materials, using FSC-certified paper has the added benefit of ensuring that the wood is sourced from forests that are responsibly managed and socially beneficial. In this way, we will be able to help reduce GHG emissions and protect forests.
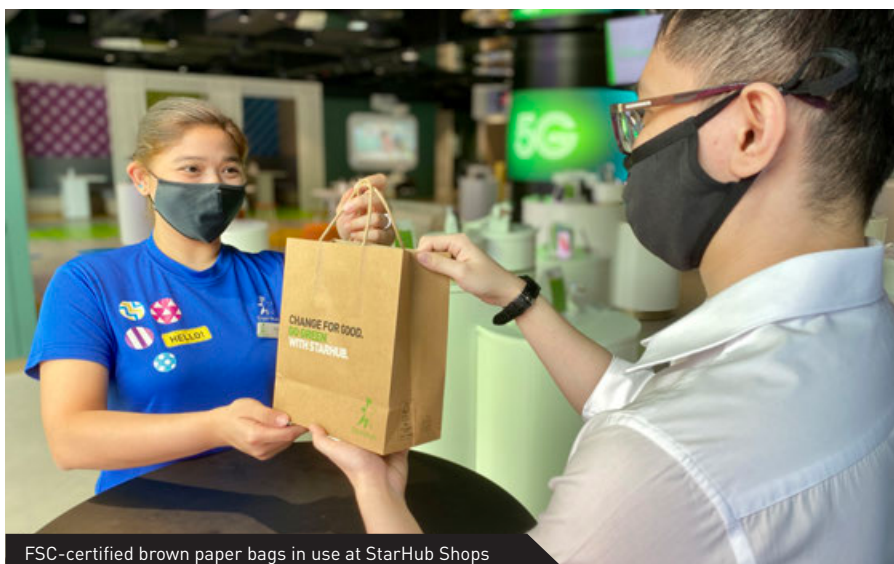
FSC-certified brown paper bags in use at StarHub Shops

SUSTAINABILITY REPORT

Water Use

103-1, 103-2, 103-3, 303-3

Although water is used in our offices and data centres, our business has a limited impact on water resources. Our potable water supply is drawn from and discharged to municipal or third-party water systems.

Through our Employee Code of Conduct and Ethics (Employee Code), employees are required to make prudent and effective use of the Group's resources. Where possible, water-efficient fittings are used to reduce our water consumption, which is monitored on a monthly basis to detect leaks and prevent wastage. Any significant increase in water consumption will trigger an inspection. We have consistently achieved a yearly reduction of at least 11% in our water use since 2018 and observed a 56% reduction in 2020 compared to the previous year. The significant reduction in water use is primarily due to the implementation of our work-from-home arrangement from March to December 2020, in response to the COVID-19 pandemic.

Water Use
(megalitres)

FY2020	9.65
FY2019	21.78
FY2018	24.70
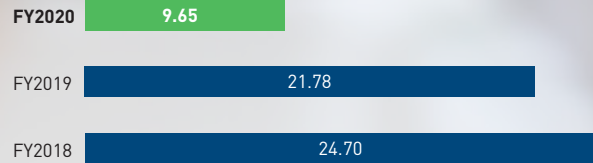
Water Intensity
(cubic metres per $million revenue)

FY2020	4.76
FY2019	9.34
FY2018	10.46
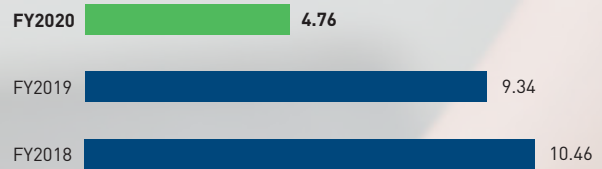
Third-Party Water Withdrawal by Source[14]

Seawater 50% — **9.65** megalitres — Surface water 50%
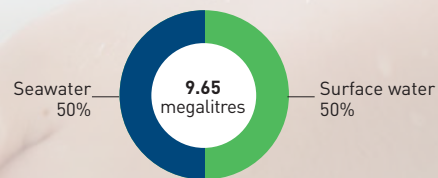
14 The breakdown of third-party water withdrawal sources is based on information published on PUB's Singapore Water Story website.

ENABLING A DIGITAL SOCIETY

As an Infocomm company, we provide services that are important growth engines for the economy, helping to connect people and businesses, and to enable a digital society. At the same time, we appreciate that unintended consequences can arise if we do not manage our business activities prudently. We are committed to innovating our products and services, while safeguarding the well-being of our customers and online users, especially vulnerable groups.

Our commitments are centred on three key areas:

1

Product and Service Quality
Maintaining the highest levels of product and service quality and reliability to establish trust and enhance customer experience.

2

Cybersecurity and Data Privacy
Ensuring adequate systems and processes are in place to prevent cyber breaches and leaks, safeguarding the data privacy of our employees and customers.

3

Online Safety
Creating awareness and implementing measures to protect the safety of our online users, especially vulnerable groups such as children.

Product and Service Quality
103-1, 103-2, 103-3, TC-TL-550a.1, TC-TL-550a.2

In a highly competitive market, it is crucial that we provide customers with the highest levels of product and service quality and reliability. It is also important that we keep up-to-date with the latest innovations and remain agile in the face of disruptive industry trends.

Infrastructure Investments

Signing of exclusive agreement to cooperate and submit joint bid for 5G licence with M1. From left, M1 Chief Technology Officer Denis Seek, M1 Chief Financial Officer Lee Kok Chew, M1 Chief Executive Officer Manjot Singh Mann, StarHub former Chief Executive Peter Kaliaropoulos, StarHub Chief Financial Officer Dennis Chia, and StarHub Chief Technology Officer Chong Siew Loong

One of our key areas of focus is ensuring continuous investment in infrastructure upgrades to improve the resilience of our network services, deliver faster speeds through our networks and become more efficient to enhance connectivity for the Internet of Things age and the next generation of mobile services (5G).

In August 2020, StarHub, with our technology partner Nokia, became the first in Singapore to launch 5G services. Customers with StarHub's new Mobile+ or Biz+ mobile plans experienced some early 5G benefits using compatible mobile devices. The early trial access to StarHub 5G was free-of-charge for customers in the lead up to the full commercial launch of 5G in 2021.

As of December 2020, StarHub 5G signals covered 70% of Singapore's populated areas. StarHub 5G is currently 'live' on 2100MHz spectrum on a non-standalone architecture, similar to other overseas 5G networks. StarHub is working towards providing ultra-fast and ultra-responsive 5G on a standalone architecture to underpin next-generation ICT and digital innovation for Singapore.

To maintain leadership in 5G, StarHub continues to actively support and participate in user trials to discover the 5G solutions for our unique local market and best serve the needs of our customers. We are collaborating with businesses, institutes of higher learning and public agency partners to co-create innovative, relevant and sustainable 5G use cases across all six national strategic clusters: Maritime Operations, Urban Mobility, Smart Estates, Industry 4.0, Consumer applications and Government applications.

Through infrastructure investments, we also ensure that our services adhere to the Quality of Service standards set by IMDA. StarHub achieved the fastest median mobile data throughputs for both 4G and 3G networks according to IMDA's H1 2020 IMconnected report. We aim to minimise instances of service disruption which affect our customers. In 2020, our average service interruption duration was 0.319322 hours per customer.

In 2020, StarHub received fines[15] totalling $242,000 from IMDA, relating to two disruptions to our internet services, being: (i) a corporate internet leased line service disruption due to a provisioning error, affecting 852 subscribers in September 2019; and (ii) a residential broadband service disruption in April 2020 due to a configuration error made during a planned network migration exercise. We have implemented additional measures to prevent any future recurrence.

15   Only significant fines above the amount of $10,000 are reported.

Building Customer Loyalty

We are continuously improving our customer experience through our "insights-to-action" approach. By collecting real-time customer feedback through surveys and across Consumer and Enterprise touchpoints, we make changes that improve our customer experience. We also use the Net Promoter System to determine the long-term value of our brand. In the CSISG 2020 study by the Institute of Service

Excellence, we improved our scores and outperformed our competition in the Mobile Telecom and Pay TV services in the info-communications sector.[16]

Please refer to pages 32 - 33 for the full list of our awards and achievements.

StarHub also stepped up our efforts to provide care and support for our customers and communities in the adoption of digital technologies, which was accelerated by the wide-ranging

movement control measures, work-from-home and home-based learning arrangements during the COVID-19 pandemic. As part of our customer service, we rolled out initiatives to bridge the digital divide and aid our customers and the less fortunate. Several of our initiatives are showcased below. Please refer to our COVID-19 response infographic on pages 136-137 for the complete list of StarHub Cares COVID-19 support initiatives.

12 of StarHub's loyal customers being several of the first to experience StarHub 5G and Augmented Reality (AR)-powered deliveries of iPhone 12

Extended free preview of content during COVID-19 movement restrictions to offer comfort and entertainment amidst trying times

16   Customer Satisfaction Index of Singapore 2020 - Retail and Info-Communications, Q1 Scores, 25 June 2020.

SUSTAINABILITY REPORT

StarHub Mobile Broadband for Home-Based Learning

Students from lower-income families enjoying StarHub connectivity for their home-based learning

As part of our sustainability initiatives in response to the COVID-19 pandemic, in collaboration with MOE, 550 students from lower-income families received unlimited mobile broadband services to support their home-based learning.

> "
>
> **At the start of the Circuit Breaker, StarHub proactively collaborated with the Ministry of Education to provide free unlimited mobile broadband and WiFi connectivity to 550 needy students, to support their home-based learning. This has contributed to the eventual decision to accelerate digital adoption and access for our students by several years.**
>
> "
>
> **Mr Ong Ye Kung**
> *Minister for Transport*
> *Former Minister for Education*

Seniors Go Digital: Digital Access for Seniors

StarHub promotes digital inclusion and offers affordable mobile service packages to lower-income seniors

As a firm supporter of IMDA's Seniors Go Digital initiative, we collaborated with the regulator to encourage digital adoption among seniors and to provide promotional rates for lower-income seniors to purchase smartphones and mobile plans.

As more information and services have moved online, digital inclusion brings quality of life to the elderly, allowing them to enjoy the convenience of accessing instant information and performing everyday tasks such as shopping, travelling and banking.

Lower-income seniors can sign up for affordable StarHub SIM-Only mobile data plans and purchase basic smartphones from $20 onwards. We also have mobile plans bundled with a smartphone. There will be no excess data charges, with surfing speeds throttled should the seniors exceed their data limits.

Our services allow seniors to enjoy the convenience of digital technology in their daily lives

SUSTAINABILITY REPORT

STARHUB CARES

Caring for Our Customers and Communities During COVID-19

During the COVID-19 pandemic, StarHub leveraged our resources to fulfil our responsibilities, extending our community relief efforts to support vulnerable groups through various response initiatives.

In March 2020, we set up the StarHub Cares COVID-19 Fund and raised over $1 million to fund various community support programmes.

The initiatives that we supported went to a variety of community sectors, including healthcare, lower-income groups, education, migrant workers and our customers. We plan to use the remaining sum in 2021 to support a food distribution initiative by the Food Bank Singapore to feed the less fortunate.

COMMUNITY RELIEF

Over **$1 MILLION** raised to fund community support programmes:

1 up to **10% of 2019 Director fees** from StarHub's Board of Directors

2 up to **one month's salary** from StarHub's Senior Leadership Team

3 voluntary donations from StarHub staff

> **matched dollar-for-dollar by StarHub**

StarHub's **20th anniversary** marketing budget of **$200,000** was diverted to fund a community cause

HEALTHCARE

$300,000 donated to **The Courage Fund**

100 Employees pledged to donate blood

Free $100 worth of **Unlimited Talktime** for healthcare workers on Corporate Individual Scheme plans for **6 months**

LOWER-INCOME BENEFICIARIES

Over **$220,000** donated to **Care Corner** to provide

2,000 welfare care packs to lower-income households & defray HDB housing rental costs for

1,822 lower-income seniors

550 underprivileged students provided with free mobile broadband devices and **6 months** of unlimited mobile broadband access for home-based learning, worth **$200,000**

MIGRANT WORKERS

500 smartphones worth $74,000 sponsored for real-time patient health telemonitoring by the Ministry of Health at Community Care Facilities

Free IDD Talktime to **India** and **Bangladesh** over Labour Day weekend

WiFi Services installed at care facilities

Over **60,000** mobile prepaid SIM cards delivered to isolated migrant workers, in partnership with IMDA

200,000 public health SMS advisories on COVID-19 sent in **7 languages** for HealthServe

Working with various NPOs to facilitate swift and direct channelling of public donations towards mobile prepaid SIM card top-ups for migrant workers

TV airtime sponsorship on over **20 channels**, encouraging Singaporeans to share words of support with migrant workers in their native languages

CHANGE FOR GOOD.
GO GREEN
WITH STARHUB.

CUSTOMER SUPPORT

ENTERPRISE SUPPORT

BUSINESS CONTINUITY PLAN SUPPORT PROGRAMME

SYNC
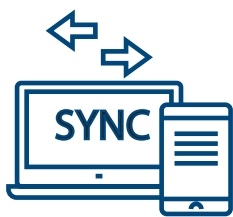
Over
10 Essential Services
for remote work made available
free-of-charge, at heavily
discounted rates or with shorter
commitment periods

SMEs given free credits for
StarHub advertising spots,
with up to
1.5x credits
when they sign up for
eligible services online

70% off
Unlimited
Business
Wireless
Broadband

Free Subscriptions
for SmartUC Mobile softphone
solution which enables customers
to make and receive calls with
their office numbers through
mobile devices and/or laptops

**No Upfront or
Monthly Fee**
for SmartConferencing, which allows
customers to host secure and high-
quality multi-party meetings online

CONSUMER SUPPORT

Network enhancements rolled out for consistent service quality and experience

39
**Top-Tiered
Channels**
made free for all
customers

Over
20,000 hours
of fresh content
every month

24/7 customer support
5 StarHub Shops remained open during
the period of heightened safe-distancing
measures to maintain accessibility
to our services

STRATEGY

BUSINESS REVIEW

GOVERNANCE

SUSTAINABILITY

FINANCIALS

SUSTAINABILITY REPORT

Cybersecurity governance framework improves our overall risk management approach

Cybersecurity and Data Privacy

103-1, 103-2, 103-3, 418-1, TC-TL-230a.1, TC-TL-230a.2

To maintain our customers' trust, we take a proactive approach towards preventing cybersecurity incidents and protecting our customers' personal information.

StarHub complies with all applicable laws, including the Cybersecurity Act and the Personal Data Protection Act (PDPA), as well as sector-specific cybersecurity requirements imposed by IMDA. Audits, risk assessments, penetration tests, vulnerability assessments and cybersecurity exercises are performed on an ongoing basis.

Preventing Cybersecurity Attacks

We recognise that the cybersecurity environment is constantly evolving, with new threats surfacing almost daily. We have implemented a cybersecurity governance framework that is aligned with both the National Institute of Standards and Technology cybersecurity framework and ISO/IEC 27001 ISMS standards.

To implement our cybersecurity governance framework across StarHub, we put in place a set of cybersecurity and information security policies for employees to comply with. These are supplemented by procedures, guidelines and checklists to ensure the confidentiality, integrity and availability of our assets. As part of our cybersecurity risk management, we have taken a cyber risk insurance policy.

In 2020, we initiated a revamp of our cybersecurity risk management and incident response frameworks for both StarHub and third-party suppliers. All policies and processes within the frameworks have been approved and will be implemented in 2021. We also conduct annual cybersecurity awareness trainings and regular cybersecurity exercises to maintain staff security vigilance.

Protecting Personal Data

StarHub's Data Protection Policy sets out how we collect, use, manage and disclose personal data in line with the PDPA. We have a Data Protection Officer (DPO) to oversee StarHub's Data Protection Management Programme and ensure compliance with the PDPA. The DPO, together with the Legal and Regulatory departments, monitor upcoming relevant legislative changes. Our Internal Audit function provides assurance to Management on the effectiveness of our control measures. Over 600 employees also attended a total of 21 awareness sessions on the PDPA, equipping them with knowledge and skills to protect the personal data of our customers.

In February 2020, StarHub was awarded the DPTM, which is a voluntary enterprise-wide certification for organisations that demonstrate accountable data protection practices.

In 2020, we had three isolated incidents which were attributable to human error, resulting in the personal data of three individuals being disclosed to the wrong party. These were rectified immediately, and disciplinary action was taken against the employees involved.

Online Safety
103-1, 103-2, 103-3

The internet has changed the way people live, work, learn and interact. As technology continues to evolve, unknown threats will emerge. As a responsible service provider, StarHub encourages and promotes the appropriate and safe use of online technology.

We provide information to educate our customers about online threats. For example, we put information relating to safe online practices on our website, community forums and social media platforms. Topics are identified through customer feedback, trending issues, internal stakeholders and other external parties. We also comply with requests from government agencies to block access to harmful websites.

We implemented robust authentication mechanisms to protect customers' data and prevent fraud and impersonation, such as the mandatory use of strong passwords for customers' Hub iD accounts, and an OTP authentication mechanism for customers who use their Mobile number to log into My StarHub app. We also took steps to suspend Hub iD Lite accounts which no longer have any active StarHub services and have been inactive for an extended period of time. Additional secure yet convenient processes supported by resilient backend systems were also implemented to prevent fraud, such as eKYC (Electronic Know Your Customer technology), which verifies customers' identity and the integrity of identification documents.

With the increasing prevalence of scams, StarHub also works closely with the relevant authorities to block international calls that spoof numbers, impersonating legitimate sources such as government agencies. A plus '+' sign prefix has been added to help users identify overseas spoof calls and reduce their risk of becoming a victim.

In addition, we offer JuniorProtect, an internet parental control service to protect children online. A subscription allows parents to manage their children's data usage and screen time, block unsafe content with easy preset filters and obtain reports and alerts on their web activities.

In 2020, our efforts to encourage and promote the appropriate and safe use of online technology resulted in doubling year-on-year the adoption of our e-commerce platform. Our e-commerce platform became the primary sales channel for new sign-ups of our services when COVID-19 movement control measures were implemented by the government from April to May 2020.

CARING FOR OUR PEOPLE & COMMUNITIES

Our employees play a vital role in ensuring that we execute our business strategy and achieve our objectives. We must stay nimble as we face increased competition for talent, as well as address demands for greater flexibility, real-time learning and purpose in the workplace. Attracting and retaining the best talent, supporting their professional growth, promoting diversity and inclusion and looking after their health, safety and well-being are priorities for StarHub. At the same time, we are committed to being a valued partner of the communities in which we operate, by supporting disadvantaged groups in digital inclusion and employability through community investment.

Our commitments are centred on four key areas:

1

Talent Management
Attracting highly-skilled individuals, and providing training and development opportunities to build a high-performing organisation.

2

Workplace Equality, Diversity and Inclusion
Promoting diversity and equality, with no discrimination based on age, race, gender identity, sexual orientation, disability, religion, family or marital status.

3

Employee Health and Safety
Creating a work environment that promotes the health and safety of our employees.

4

Investing in Local Communities
Investing in communities to support disadvantaged groups in digital inclusion and employability.

LEAP session conducted online via video conference
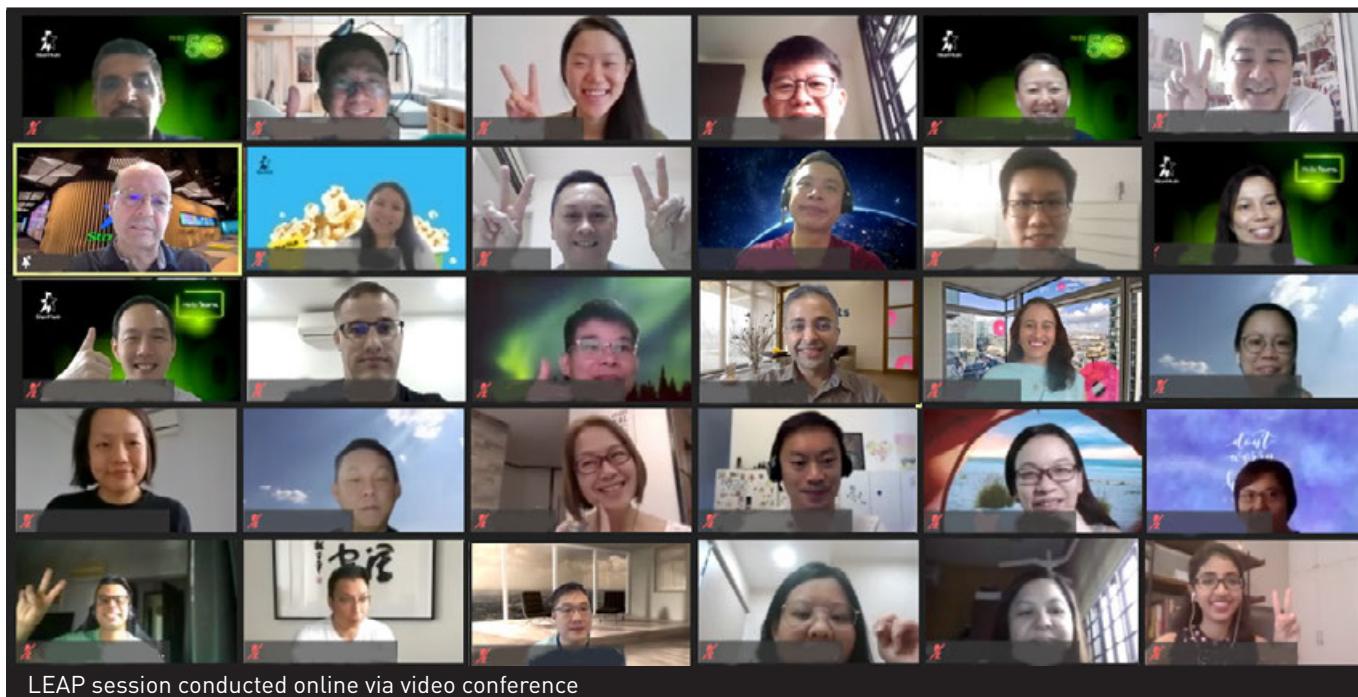
Talent Management

103-1, 103-2, 103-3, 401-1, 401-2, 401-3, 404-1

Our industry is undergoing rapid transformation, which requires us to constantly assess the skills that are critical for our business. We are focused on attracting and retaining highly-skilled individuals, engaging our employees to maximise their potential, and providing training and development opportunities to build a high-performing organisation.

We launched the Leadership Accelerator Programme (LEAP), a 12-month leadership development journey designed to accelerate the development of key talents and build T-shaped leaders for StarHub. The journey is designed to have the right mix of Experience, Exposure and Education to maximise their learning outcomes. Each key talent has an Individual Development Plan that is tailored for their own development goals. They are supported by their direct manager, a Senior Leadership Team (SLT) Development sponsor who is able to provide the cross-functional perspective, as well as a dedicated professional coach throughout this journey. The Education portion is bite-size and highly action-oriented with opportunities for learning from external subject matter experts as well as peer learning and self-reflection.

We use alternative recruitment channels, such as hackathons, and partner with local universities on the Integrated Work Study Programme, to tap into a larger talent pool, especially for tech-based roles. We offer our employees competitive remuneration packages commensurate with their job responsibilities, level of experience and performance. Full-time employees are entitled to additional benefits, such as subsidised Mobile, Pay TV and Broadband subscriptions, plus additional leave for birthdays, examinations, eldercare and volunteering. We also offer comprehensive health screening packages, and additional insurance for medical, dental, life and accident cover.

SUSTAINABILITY REPORT

New Employee Hires and Turnover by Gender

			Total
Number of new hires	124	89	**213**
Rate of new hires[17]	12%	12%	**12%**
Number of turnover	325	192	**517**
Rate of turnover[17,18]	32%	25%	**29%**

■ Male ■ Female
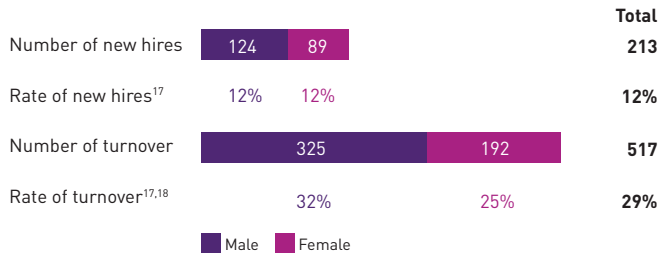
Number of Employees by Employment Contract, by Gender[17]

			Total
Permanent	973	713	**1686**
Contract/Temporary	52	55	**107**
Full-time	1024	762	**1786**
Part-time	1	6	**7**
Total	1025	768	**1793**

■ Male ■ Female
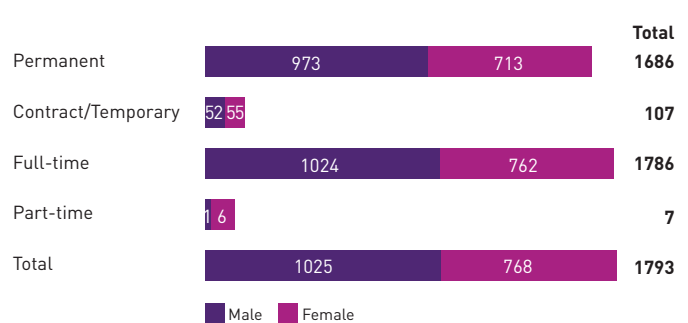
New Employee Hires and Turnover by Age Group

				Total
Number of new hires	51	153	9	**213**
Rate of new hires[17]	24%	11%	5%	**12%**
Number of turnover	89	388	40	**517**
Rate of turnover[17,18]	41%	28%	20%	**29%**

■ <30 ■ 30-50 ■ >50

Proportion of Local Employees

17% / 9% / 74%

■ Singapore Citizens
■ Singapore PR
■ Non-Singaporeans

Training and Development

StarHub is committed to the development of all talents within the organisation. We co-design individual development plans with identified high-potential employees. For all other employees, we continue to create and ensure employees have access to programmes for their professional development, in the domains of technical skills and personal effectiveness.

Building our employees' skills and capabilities is essential for employee retention, and helps them stay up-to-date on the latest industry developments. StarHub has identified cybersecurity, robotics, virtualisation and mobile network engineering as key skills and capabilities to help our employees better carry out their roles. Learning opportunities are provided through classroom training, on-the-job training as well as digital learning platforms such as LinkedIn Learning. In addition, we offer a range of sponsored training courses, including professional

certifications, such as VMware and Red Hat for StarHub's Integrated Network Engineering team.

To maximise learning opportunities for our employees, we have also established partnerships with multiple government agencies, such as SkillsFuture Singapore and IMDA.

The intent of these initiatives is to encourage all employees to build and develop skills for their personal development and growth, while developing the overall human capital within StarHub.

We invested $401,275 in training in 2020 and received $128,424 in training subsidies from various government agencies. These include IMDA's Company-Led Training funding. In total, we provided 16,857 hours of training for our employees. Through our learning and development programmes, we reached 77% of our workforce. The drop in overall training hours from 2019 is mainly due to most learning activities

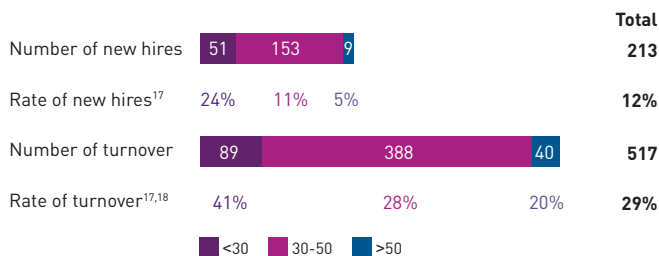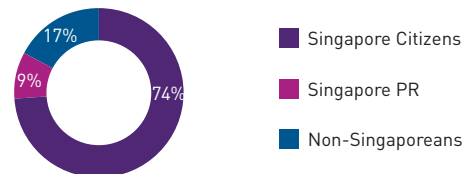being delivered in bite-size formats to accommodate remote learning during the COVID-19 pandemic.

Our employees receive regular performance and career development reviews as part of StarHub's performance management system. Personal targets are set by supervisors and employees under five categories: Financial, Business, Customer, Process and People. Behavioural goals are also set according to StarHub culture markers and behaviours.

We have signed a Memorandum of Understanding (MOU) in 2016 with the Singapore Industrial and Services Employees' Union (SISEU), pursuant to which employees can take part in recreational and social activities. We maintain a collaborative partnership and have open and timely dialogues while continuing to work diligently to ensure our employees' skills stay relevant as we keep our business at the forefront of technological innovations and market trends.

17   Number of employees, rates of new hires and employee turnover are reported based on year-end headcount.
18   Turnover includes both voluntary and involuntary turnover and refers to the employees who left the company during the reporting period.

Average Training Hours Per Employee Category and Gender

Category	Male	Female
Senior Management	11.89	13.05
Middle Management	12.06	12.58
Function Employees	8.06	9.08
Overall	9.12	9.78

■ Male ■ Female
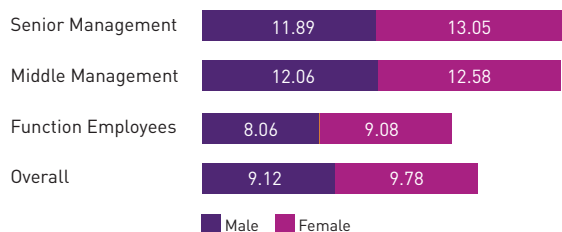
Workplace Equality, Diversity and Inclusion

102-8, 103-1, 103-2, 103-3, 405-1, 405-2, 406-1

StarHub understands the importance of having a diverse and inclusive workforce to provide the organisation with different perspectives and skills. We aim to promote this and foster a culture where all employees are treated fairly and with respect.

Management regularly reviews Human Resource (HR) policies and practices related to hiring, diversity and inclusion, equal opportunity, anti-harassment, training as well as performance management. We adhere to fair employment practices, strive to provide a safe, non-discriminatory work environment and continually strengthen our workplace policies to provide a level playing field for our employees. Fair remuneration is a component of our HR policies, which include merit-based hiring, reward for performance, diversity and equal opportunity. StarHub promotes meritocratic employment, development, recognition and reward. We are proud that currently, 43% of our workforce and 25% of our Board members are female.

As a signatory to Tafep, a national initiative to promote the adoption of fair employment practices, StarHub abides by local labour laws, implements fair employment practices and prohibits any kind of discrimination in employment or transactions. In 2020, no incidents of discrimination were reported directly to StarHub or through Tafep.

Under our anti-harassment policy, employees are able to report any incidents of harassment to their immediate supervisor or the HR department without the risk of reprisal. The company will promptly investigate any complaints of harassment and take prompt remedial action to resolve complaints.

The higher employee turnover rate of 29% in 2020 was due to the transfer of employees from StarHub's Information Services team to PCCW Solutions as part of StarHub's strategic IT imperative. There were more male employees than female employees who were transferred, resulting in a higher turnover rate for male employees.

In accordance with the Ministry of Manpower (MOM) guidelines, StarHub employees are entitled to maternity, paternity and shared parental leave. Eligible working fathers are entitled to two weeks of paid paternity leave and up to four weeks of shared parental leave. To facilitate parents returning to work, StarHub provides paid child care leave, nursing rooms and child care facilities at our headquarters in StarHub Green. In 2020, 106 of our employees took parental leave with 98% returning to work thereafter. We also had a retention rate of 75% for those employees who returned to work in 2019 and remained in StarHub's employment for another 12 months after their parental leave.

In 2020, we had zero incidents of discrimination or corrective actions taken.

Recognised as One of the Top 10 Companies in Inaugural Singapore Board Diversity Index

Our HR policy promotes workplace racial and gender inclusivity evident in our diverse teams

We were recognised in the inaugural Singapore Board Diversity Index for embracing diversity on our corporate boards. Launched by Willis Towers Watson, developed in partnership with the Singapore Institute of Directors and supported by BoardAgender, the Index tracks listed companies using eight dimensions, including gender, age, tenure, board independence, cultural ethnicity, international experience, domain expertise and industry knowledge.

We believe board diversity to be critical to our performance as a company, as directors with diverse backgrounds bring different perspectives, help us avoid "groupthink" and enhance the Board's deliberations and decision-making process.

AdvertisHER: Recognition for gender representation in Singapore advertising

StarHub's video 'Our Founding Mothers' pays homage to the inspiring women of Singapore

Our 'Founding Mothers in Singapore' advertisement was ranked 7th amongst Singapore companies for gender portrayal in an initiative by gender equality organisation AWARE and marketing consultancy R3 Worldwide. The advertisement was ranked positively for its portrayal of women in areas such as body image, beauty standards and breaking stereotypes.

The recognition is testament to our commitment to gender equality. We believe in the important role we play as an advertiser, recognising that advertisements end up shaping reality and societal norms, including the visibility and status of women. More information on the study can be found on AWARE's website.[19]

Ratio of Base Salary[20]

Category	Male	Female
Senior Management	1.11	1.00
Middle Management	1.00	1.00
Function Employees	1.02	1.00
Overall	1.13	1.00

■ Male ■ Female

Age Diversity by Employee Category

Category	<30	30-50	>50
Board	17%		83%
Senior Management		71%	29%
Middle Management		84%	16%
Function Employees	16%	75%	9%
Overall Workforce (excl. Board)	12%	77%	11%

■ <30 ■ 30-50 ■ >50
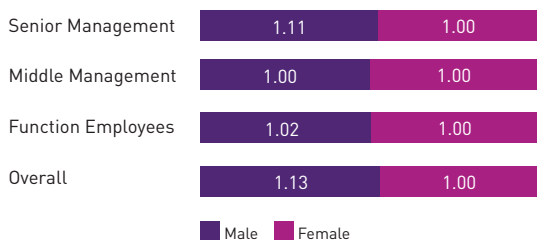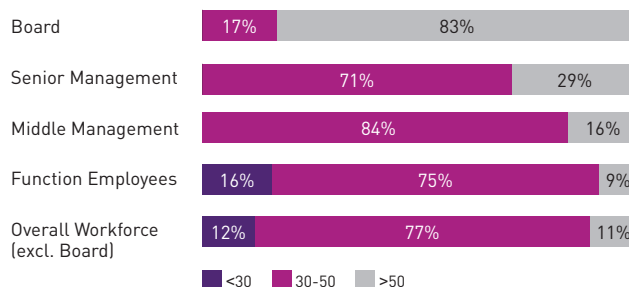
Gender Diversity by Employee Category

Category	Male	Female
Board	75%	25%
Senior Management	68%	32%
Middle Management	64%	36%
Function Employees	55%	45%
Overall Workforce (excl. Board)	57%	43%

■ Male ■ Female
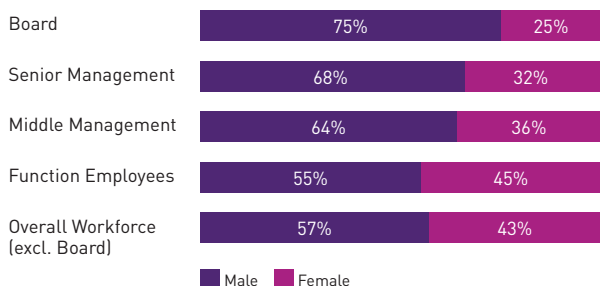
Ethnic Diversity by Employee Category

Category	Chinese	Malay	Indian	Others
Board	42%		16%	42%
Senior Management	75%		6%	19%
Middle Management	84%	1%	8%	7%
Function Employees	71%	9%	5%	15%
Overall Workforce (excl. Board)	73%	7%	6%	14%
National Composition[21]	74%	14%	9%	3%

■ Chinese ■ Malay ■ Indian ■ Others

Parental Leave

55 Paternity Leave
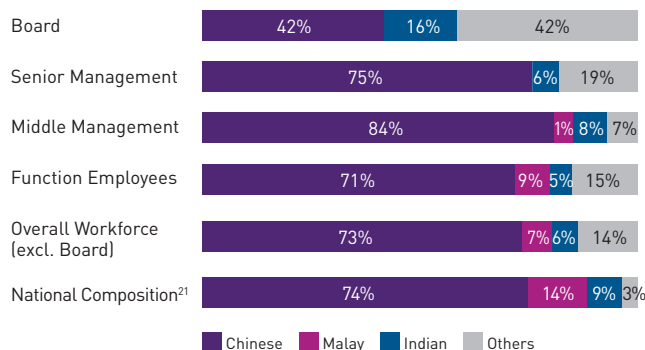
51 Maternity Leave

Return to Work Rate

96% — 53 Male

100% — 51 Female
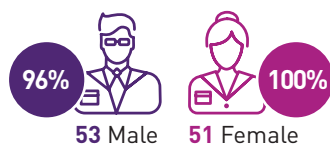
Retention Rate (after 12 months)

72% Male
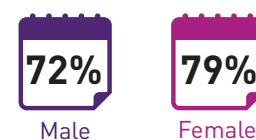
79% Female

19   AWARE and R3 Study on Gender in Singapore Advertising, 6 July 2020.
20   Based on the average base salary per male employee over the average base salary per female employee.
21   Ethnic Composition of the Resident Population 2020 End June published by the Department of Statistics Singapore as at 24 September 2020.

SUSTAINABILITY REPORT

Employee Health and Safety
103,1, 103-2, 103-3, 403-9

Caring for Our Employees During COVID-19

A company is only as strong as its people. The unprecedented health risks and challenges brought about by the COVID-19 pandemic reinforced the need to maintain the health and safety of StarHub employees as a key priority, as the company continues to serve customers amidst the public health situation.

From as early as January 2020, we took precautionary measures in line with government advisories to support and protect all our employees. Other than restrictions on travel, face-to-face meetings and visitors, we also activated split-team operations and work-from-home arrangement to minimise the risk of infection and ensure business continuity. Frontline staff received necessary protective equipment, including hand sanitisers and surgical masks, and the frequency and depth of sanitisation routines were also stepped up.
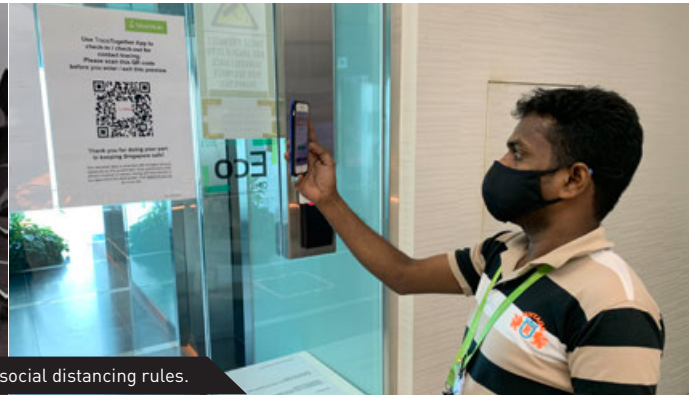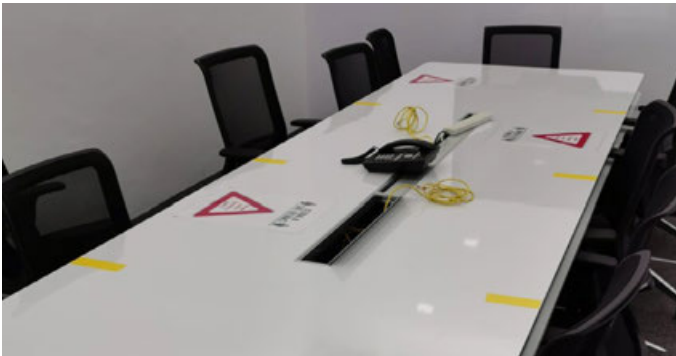
Safe distancing measures implemented to help employees adhere to safety and social distancing rules.

EMPLOYEE CARE

WFH BENEFITS include waiver of office carpark fees and reimbursement of work-from-home accessories through flexible benefit claims

#HUBBAWEEK Daily activities and learning resources such as fitness and wellness classes as well as company-wide virtual townhalls

Timely implementation and compliance with government advisories on precautionary or safety measures and prompt communication to all staff

Frontline staff provided with **Necessary Protective Equipment** such as hand sanitisers, personal protection equipment and surgical masks
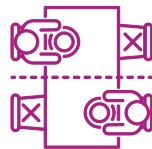
Split-team operations were activated with staff on work-from-home arrangement to prioritise staff safety

Frequency and depth of **Sanitisation Routines** were also stepped up

Unlimited Talktime provided for staff to stay in contact with friends and family

The **#SHCIRCUITBREAKERCHALLENGE** was launched to digitally bridge the distance between staff by engaging them through creative and entertaining means

Amidst physical separation, it was important for our employees to maintain relational connections with each other. The SLT conducted fortnightly company-wide virtual townhalls called #HubberHangout to provide business updates and well-being advice as well as field questions. Team leaders were also empowered to conduct regular well-being checks. To facilitate greater connection with family, friends and colleagues, all staff were given unlimited Mobile talktime.

To connect with staff and lift their spirits, a series of Bring Your #Mojo weekly challenges and contests, was introduced. This initiative started with the #SHCircuitBreakerChallenge to encourage staff to share their off-work activities, gain new skills, and learn about fellow colleagues through creative and entertaining means using video recordings, which ended with the SLT Edition.

BRING YOUR MOJO

Bring your #Mojo SLT Edition

The health and safety of our employees is a key priority for StarHub. Under our Occupational Health and Safety Management system, StarHub's Workplace Safety and Health (WSH) Committee, represented by management and employees, periodically reviews policies, procedures and practices relating to occupational health and safety. Our trained Risk Assessment Leaders and Managers within the WSH Committee work with the nominated workers' representatives across the organisation to identify and eliminate or minimise the WSH hazards of every work activity in the workplace. We require contractors undertaking work at our sites to comply with the provisions of the Workplace Safety and Health Act.

We also require contractors to submit a risk assessment report for approval prior to carrying out any work onsite.

Internal communication channels have been set up for employees to report unsafe work practices. Our external partners may also report any WSH-related issues through their StarHub counterpart or escalate the issue directly

to MOM. As an organisation, we report WSH-related incidents to MOM. The employees of our contractors are not included in the reporting of our safety performance because it will be done by their direct employers.

In 2020, there were no incidents of work-related fatality or occupational disease. There were two reported cases of work injury compensation related to falls, with an overall absenteeism rate of 1.2%.

For employees in job roles that require WSH domain knowledge, StarHub provides company-sponsored training

to enhance their skills and capabilities to deal with WSH-related issues. Examples of training support include first-aid, work-at-height and incident management processes to respond to emergencies. As of December 2020, 20 StarHub employees had undergone the bizSAFE Level 2 Risk Management Champion training and two employees have undergone the bizSAFE Level 4 WSH Management System Champion training. StarHub continues to be a certified bizSAFE Level 3 organisation, which is awarded by the Workplace Safety and Health Council Singapore following an independent audit.

Workplace Health and Safety Performance[22]	2020	2019	2018
Number of Workplace Fatalities	0	0	0
Number of Occupational Disease Cases	0	0	0
Workplace injury incidence rate (per 100,000 employees)[23]	112	144	45
Workplace Injury frequency rate (per million hours worked)[24]	0.6	0.7	0.2
Workplace injury severity rate (per million hours worked)[25]	1.7	12.8	0.1
Absenteeism Rate %	1.2	1.8	1.6

22 Workplace health and safety performance metrics are reported based on the International Labour Organization definitions.
23 Previously given as Workplace Injury Rate.
24 Previously given as Accident Frequency Rate.
25 Previously given as Accident Severity Rate.

STRATEGY

BUSINESS REVIEW

GOVERNANCE

SUSTAINABILITY

FINANCIALS

SUSTAINABILITY REPORT

Investing in Local Communities

103-1, 103-2, 103-3, 413-1

As a homegrown company, StarHub is committed to helping vulnerable groups in our communities to tide them over hardships caused by the COVID-19 pandemic. As part of our sustainability initiatives, we have been giving back to our communities through various StarHub Cares programmes, including financial relief as well as support using our know-how in info-communications, entertainment and digital solutions. In March 2020, we set up the StarHub Cares COVID-19 Fund and raised over $1 million to fund various community support programmes. Details on the set up of the Fund and our community support initiatives are given in our COVID-19 response infographic on pages 136 to 137.

In 2020, StarHub contributed a total of $1,738,628 to our communities, reaching over 8,000 beneficiaries. Out of the total sum, $1,008,628 was raised under the StarHub Cares COVID-19 Fund for community support and the remaining $730,000 was donated to seven VWOs and NPOs to support causes that are in line with our ethos. The breakdown of donations to the VWOs and NPOs is set out in the table on the right.

StarHub's generous donations were recognised at the annual Community Chest Awards with a Community Spirit Gold and a Charity Gold. We also received the Community Partnership Excellence Award at the People's Association Community Spirit Awards 2020 and a certificate of appreciation at the President's Volunteerism & Philanthropy Awards.

StarHub's Community Investment Contributions in 2020

$100,000	Nurture programme
$100,000	Metta Welfare Association
$90,000	Singapore Environment Council for the School Green Awards
$60,000	Singapore Anglican Community Services
$50,000	Care Corner Youth Services, Online Engagement Initiative
$20,000	SHINE Children and Youth Services
$10,000	WWF Solar Light Challenge
$300,000	WWF Earth Hour (in-kind donation of TV airtime)

Community Spirit Gold and Charity Gold awards from the Community Chest

Community Partnership Excellence Award from the People's Association

Chief Executive, Nikhil Eapen, receiving the Community Partnership Excellence Award from Mayor Denise Phua during her visit to StarHub corporate office

Chief Corporate Officer, Veronica Lai, and Chief Financial Officer, Dennis Chia, presenting welfare care packs to seniors at Care Corner

Besides monetary contributions, we work with several organisations that equip underprivileged youths and families as well as people with disabilities with digital, employability and essential life skills. Our additional support comes in the form of access to information and communication technology, knowledge transfer as well as voluntary employee time. We recognise that the use of our products and services affects people's lives. In most cases, the impact is positive, with individuals having increased access to information and services. However, new technologies require new skills, which can be challenging for disadvantaged groups. We are committed to supporting disadvantaged groups in the areas of digital inclusion and employability through community investment.

Chief of Enterprise Business Group, Charlie Chan, at our blood donation drive

Defrayment of HDB housing rental costs for lower-income seniors

SUSTAINABILITY REPORT

Employee Volunteering

Our employees are encouraged to participate in community volunteering. Each year, we organise several volunteering activities and provide up to two working days of paid volunteering leave per employee. Despite the COVID-19 restrictions, we organised two volunteering events in 2020 (Blood Bank donation drive and WWF Solar Light Challenge). Our employees collectively volunteered 310 hours of their time in 2020, with 72 employees (4% of our workforce) using their volunteering leave allowance. With less stringent movement control measures expected to be in place for 2021, we look forward to increasing employee participation in community activities and will ramp up our initiatives to make a greater impact together as a Group.

The Care Corner Youth Services

Since 2017, StarHub has been partnering with Care Corner Youth Services, which reaches out to at-risk youths who lack meaningful engagement at home and in school, with the aim of creating a safe and encouraging environment to help empower them.

This year, due to COVID-19 restrictions, we pivoted to support Care Corner Youth Services to create an online platform, providing an avenue of outreach to the youths through cyberspace. This online engagement initiative provides youths with access to support and one-to-one intervention in the absence of physical interaction.

Through this initiative, we reached 2,375 youths. Engagement levels were high with an encouraging number of comments and responses provided following each outreach series. We also had 33 youths receiving interventions, surpassing our target of 30.
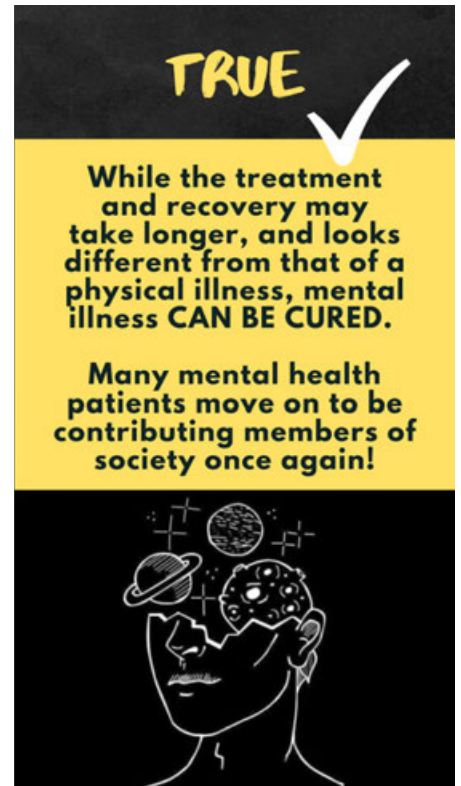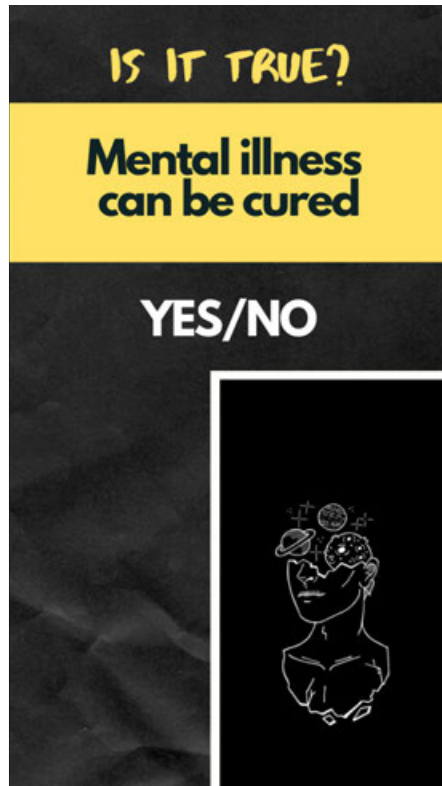
Care Corner's online engagement on mental wellness via social media, supported by StarHub

Central Singapore CDC's Nurture Programme

Since 2011, we have supported the Nurture programme, led by the Central Singapore CDC. Through interactive and activity-based lessons, the programme aims to complement the efforts by MOE and various self-help groups to assist children in two main areas: build up their confidence as communicators and develop their problem-solving skills. The programme also aims to cultivate values that inspire them to give back to the community.

In 2020, the programme was conducted via online enrichment workshops as physical lessons were suspended from April to September 2020 due to COVID-19 restrictions. With the help of 148 volunteers and 21 Nurture Lead Teachers, the programme reached 242 beneficiaries.

Some key highlights from the workshop series include:

VR 3D modelling workshop series
Using different themes for each session, the children learnt important values and gained knowledge on topics such as environment conservation, while picking up digital skills to create their own virtual environment and characters.

Speech & Drama and Illustration workshops - In collaboration with Singapore Book Council
The children further honed their communication skills through engaging interactive speech and drama activities, as well as various illustration exercises.

Mindfulness Webinars - In collaboration with Social Innovation Park
Through engaging hands-on segments such as mindfulness routines, kids' yoga, sharing and reflection, the children were taught how to adopt positive thinking and be more emotionally resilient, such as how to better manage difficult emotions and accept the new normal with greater awareness.

'Book A Writer' series - In collaboration with Sing Lit Station
In this exciting series of 'Book A Writer' workshops, local bestselling authors of popular children literature - Adeline Foo, A.J. Low and Neil Humphreys - facilitated the workshops and shared useful writing tips with the children. With these insights, the children managed to create their own story characters and plots, including funny characters inspired by real-life incidents and devious villains using their imagination.

Moments captured from the 'Book A Writer' workshop series, supported by StarHub
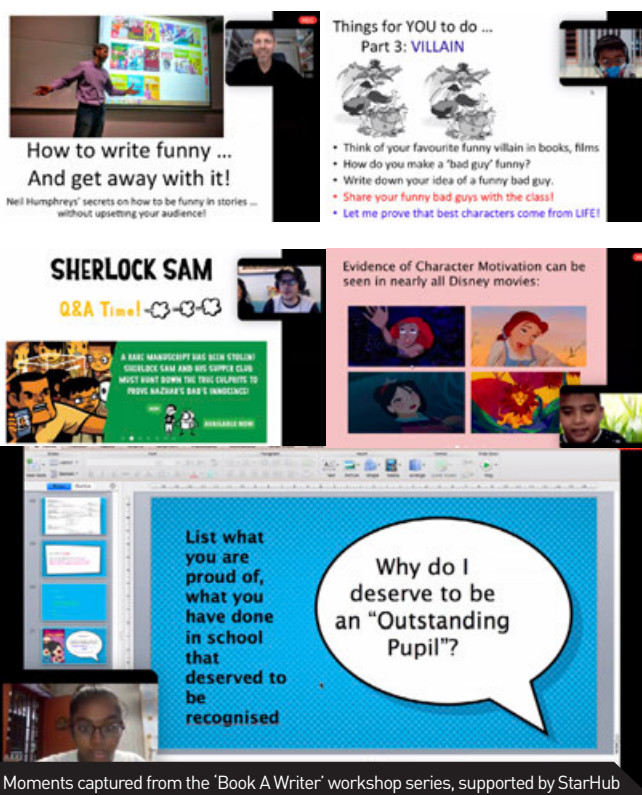
Success story #1
Rupini d/o Koesmin,
aged 11, Nurture @ Jalan Kayu

Rupini has been attending the programme since she was in Primary 1. Being familiar with the routines of the programme and the volunteer team, she has grown very confident and outspoken, at times even being disruptive in class.

Under the guidance of her Lead Teacher and volunteers, Ruipini has shown progress in being more considerate in class and learnt to channel her energy positively. For instance, she now takes the initiative to help her teacher with tasks such as cleaning the whiteboard. She also extends a helping hand to teach her peers who are lagging behind in class.

Success story #2
Yu Siqing,
aged 8, Nurture @ Kreta Ayer-Kim Seng

Siqing has improved tremendously in her self-confidence as well as her English listening and speaking skills.

As she previously had a weak grasp of the English language, she required assistance to translate the questions into Chinese or would provide her answers in Chinese. She was also too shy to offer to answer any questions in class.

Now Siqing is able to express herself much more confidently and would raise her hand to answer questions on her own without being prompted.

SUSTAINABILITY REPORT
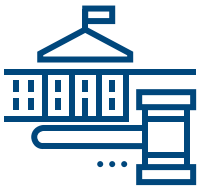
EMBEDDING RESPONSIBLE BUSINESS PRACTICES

Acting responsibly is integral to maintaining the trust and confidence of our stakeholders. We are committed to conducting all our business activities with the utmost integrity. This involves implementing an effective governance structure and fostering a culture of ethical business conduct.

Beyond our own business operations, we have put in place responsible procurement practices to manage our supply chain impact. We also aim to safeguard public health from the potential adverse effects of RF emissions.

Our commitments are centred on four key areas:

1

Business Conduct and Ethics
Conducting our business responsibly, upholding the highest standards of ethics and integrity.

2

Supply Chain Management
Implementing responsible procurement practices and managing our supply chain through engagement and collaboration.

3

Public Health and Safety
Adhering to best-practices, safety standards and regulations on the safe use of RF energy.

4

Responsible Marketing and Selling
Marketing our products and services responsibly, ensuring clarity on pricing and billing.

Business Conduct and Ethics

102-16, 102-17, 103-1, 103-2, 103-3, 205-3, 206-1, 419-1, TC-TL-520a.1, TC-TL-520a.3

As a public company listed on the Mainboard of the SGX-ST, StarHub has to be responsible and accountable to a wide range of stakeholders. Maintaining high standards of business conduct and ethics are paramount to our long-term success.

We do not tolerate ethical or legal violations, including corruption. We adhere to the listing requirements, as well as the revised Code of Corporate Governance issued by the Monetary Authority of Singapore on 6 August 2018, and comply with all applicable laws in Singapore. We have put in place an Employee Code, which sets out the standards of behaviour and business conduct that address safety, harassment and corruption issues. Our Employee Code is supplemented by other policies which reinforce certain aspects of business conduct and procedures when dealing with customers, business associates and other stakeholders. These include the Corporate Gift and Hospitality Policy, the Insider Trading Policy and the Supplier and Vendor Policy. All our policies are communicated to our employees upon hiring and can be readily accessed through our intranet.

Our Whistle Blowing Policy provides employees and external parties with accessible channels to raise concerns in good faith and in confidence on any possible improprieties in our business activities, without the risk of reprisal. These include a dedicated whistle blowing channel to the Audit Committee Chairman and the General Counsel.

Employees found in breach of our Employee Code or other applicable policies will face appropriate disciplinary and legal actions, including dismissal. There were no reported incidents of corruption in 2020.

We also respect and comply with relevant legislation, licence obligations and codes of practice relating to anti-competitive behaviour for our business. We adhere to IMDA's Net Neutrality policy, which ensures that all content providers on the Web are treated equally by internet service providers. Network management is only used to allocate access to the finite network resources and bandwidth according to our customers' subscription plans, to ensure a fair use of network resources.

There were no legal actions taken against StarHub for anti-competitive behaviour in 2020.

As a testament to our responsible corporate governance, StarHub has been ranked 38th out of 577 Singapore-listed companies in SGTI[26] for 2020.

Overall, there were no other incidents[27] of significant fines and non-monetary sanctions for non-compliance with laws and regulations in the social and economic area, other than the two fines totalling $242,000 mentioned on page 132 of this report.

Public Health and Safety

103-1, 103-2, 103-3, 416-2

StarHub recognises the need to address concerns from customers, regulators and the general public on the perceived health risks associated with RF emissions from mobile devices and base stations.

The use of RF spectrum in Singapore is regulated by IMDA and the National Environment Agency (NEA). We comply strictly with RF emissions and safety standards implemented by the regulators. RF emissions from StarHub's equipment are well within the guidelines developed by the International Commission on Non-Ionizing Radiation Protection and adopted by the World Health Organization. Where required, StarHub works closely with NEA and other mobile network operators to verify that the mobile equipment installed complies with public health and safety standards in Singapore.

There were no incidents of non-compliance concerning the health and safety impact of our products and services in 2020.

Supply Chain Management

103-1, 103-2, 103-3, 102-9, 204-1, 308-1, 414-1

We recognise that being a responsible business requires the integration of sustainability practices into our procurement and supply chain management processes. StarHub has an extensive and complex supply chain which spans geographies and sectors. Due to the nature of our global supply chain, our business is exposed to additional risks which need to be managed in order to build resiliency, reduce disruption, enhance efficiencies and safeguard our reputation.

Our main suppliers include major handset and hardware manufacturers, as well as software and infrastructure solution providers. Local suppliers made up about 95% of our total procurement spend of $1.65 billion in 2020[28], while 90% of our total supplier base of 2,015 suppliers were local.

In 2017, we began our supply chain risk assessment process. We completed a segmentation exercise using a weighted approach based on relevant factors for each supplier category, allowing us to identify 47 high-risk suppliers that have higher resiliency and compliance risks.

In 2018, we updated our Supplier Code of Conduct (Supplier Code) based on the ten principles of the UN Global Compact, to outline the standards required of our

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26 SGTI is the leading index for assessing corporate governance practices of Singapore-listed companies.
27 Only incidents with significant fines above the amount of $10,000 are reported.
28 Supply chain procurement spend includes all procurement conducted during 2020, with or without a Purchase Order (PO), except for those related to content acquisition. Suppliers are classified as local if the purchase is made from an entity located in Singapore, as these entities contribute to Singapore's economy.

suppliers in the areas of human rights, labour, environment and anti-corruption. In the first phase of our implementation, we included the Supplier Code in the Terms and Conditions issued to our suppliers with each PO, pursuant to which they agreed to adhere to the standards set out in the Supplier Code through their acceptance of the PO. With the formal governance structure established in 2019, we implemented our Responsible Sourcing Policy in 2020, which reserves our right not to procure goods and services from suppliers who do not adhere to the Supplier Code.

Going forward, we will conduct further due diligence by requesting our suppliers to complete our online Supplier Self-Assessment Questionnaire, which assesses their compliance with the Supplier Code. In the first phase of our implementation, 50 of our key suppliers with a minimum spend of $1 million in 2020, including those among the 47 previously identified as high-risk suppliers, had completed their self-assessment. All 50 suppliers have indicated that they complied with our Supplier Code and have required the same of their suppliers, where applicable. The subsequent phases will include a self-assessment of the remaining suppliers implemented as a form of pre-qualification for new suppliers, to be refreshed at least once every three years. We aim to use this exercise to ensure that our suppliers are continuously aligned with our values and the requirements set out in the Supplier Code.

Responsible Marketing and Selling

103-1, 103-2, 103-3, 417-2, TC-TL-220a.1, TC-TL-220a.2, TC-TL-220a.3

To maintain the loyalty of our customers and attract new customers, it is important for us to market and advertise our products and services responsibly, as well as ensure clarity in our pricing and billing. Following the success of the giga! launch in 2019, we refreshed our StarHub Rewards programme in 2020, to give our customers instant rewards. In 2020, we were recognised for our marketing efforts and won a total of 18 awards from five different organisations. Please refer to pages 32 - 33 for the full list of our awards and achievements.

List of 18 Marketing Awards

StarHub Rewards
Loyalty & Engagement Awards 2020
- Gold for Best Loyalty Programme - Telecommunications
- Gold for Most Innovative Loyalty Programme
- Silver for Best Use of Rewards & Incentives
- Silver for Best Use of Mobile

Mob-Ex
- Gold for Best User Experience
- Silver for Best Use of Mobile - Customer Engagement
- Silver Most Innovative Use of Mobile
- Silver Most Innovative Use of Mobile Technology

Marketing Excellence Awards
- Gold for Excellence in Loyalty Marketing
- Silver for Excellence in Gamification

giga!
Mob-Ex
- Silver for Best Mobile Growth Strategy
- Bronze for Best Insight Driven Mobile Campaign
- Bronze for Use of Mobile

The Asia eCommerce Awards
- Silver for Best Use of AI
- Bronze for Best Use of UI / UX Design
- Bronze for Best e-Commerce Fulfilment

Marketing Excellence Awards
- Silver for Excellence in Social Media Marketing

Westworld FreeView
Promax Asia Awards 2020
- Silver for Best Online / VOD Service Promo

We comply with all applicable local regulations and guidelines, such as the Television and Radio Advertising and Sponsorship Code. Our DPO oversees compliance with our Do-Not-Call (DNC) Policy, which guides and ensures that we comply with the PDPA – DNC Registry provisions. Targeted marketing messages will only be sent to mobile numbers in Singapore where consent has been obtained and any messages sent will have an appropriate tag prefixed to ensure the clear intent of our communication. Our Customer Communication Guidelines supplement our DNC Policy and serve as further guidance on customer communication.

In 2020, we continued to accelerate our Hello Change strategy to do things differently by simplifying and improving our services with no hidden fees. We simplified our TV plans by converging IPTV and OTT with the introduction of StarHub TV+, providing better value and flexibility. We also released our bundled Broadband, TV entertainment and Netflix all-in-one subscription with HomeHub Plus, offering unlimited entertainment with over 90,000 hours of shows at home and on-the-go. We also continue to curate the best OTT entertainment services for our customers with partners such as iQIYI, Hotstar, Netflix, HBO GO, TVBAnywhere+, BBC Player and beIN Sports Connect.

StarHub TV+ entertainment reimagined

SUSTAINABILITY REPORT

When we launch new products and services, our Customer Service team is trained to communicate our pricing structure and contractual terms clearly and transparently to our customers. Customers also have the convenience of accessing the My StarHub app or our website to manage their subscriptions and pay their bills.

There were no incidents of non-compliance relating to regulations and/or voluntary codes concerning marketing communications in 2020. We received one clarification notice from the Advertising Standards Authority of Singapore in relation to one of our advertisements, which was promptly reviewed and edited to address viewers' concerns.

StarHub Marketing team and Digital team receiving their awards

STAKEHOLDER ENGAGEMENT

102-21, 102-40, 102-42, 102-43, 102-44

Our interactions and engagements with our stakeholders are essential to ensure we continue to create value for them and achieve our long-term success as a business. By promoting open dialogue, we create an environment in which our stakeholders can share their feedback on how we can do things differently or work together with us to improve our practices.

Through a stakeholder mapping exercise and annual review, we have identified our main stakeholders based on the potential for StarHub to impact their part of the value chain, as well as their potential to impact our business.

NTUC Assistant Director-General and Director of NTUC Membership Services Division, Vivek Kumar (left) with StarHub Chief of Consumer Business Group, Johan Buse, signed an MOU for partnership extension

Engagement to Narrow The Digital Divide

StarHub has been in a strategic partnership with the National Trades Union Congress (NTUC) since 2017. On 27 October 2020, we signed a Memorandum of Understanding (MOU) to extend the partnership until December 2022.

The partnership will equip union members with 5G knowledge and provide them with a suite of members-only promotions for our Mobile, TV and Broadband services. As an additional measure to narrow the digital divide, StarHub has offered two 12-month complimentary mobile plans to every member with a gross monthly income of less than $2,000.

The COVID-19 pandemic changed the nature and focus of our engagement with stakeholders. Virtual meetings and online communications were used to maintain open dialogue with our stakeholders, replacing face-to-face meetings where possible. Engagement with customers and employees were made more frequent, to build confidence amidst the uncertainty.

The following table summarises our key engagement efforts during the reporting period.

■ Internal Stakeholders
■ External Stakeholders

SUSTAINABILITY REPORT

Summary of Stakeholder Engagement Efforts in 2020

Stakeholder Group	Engagement Method & Frequency	Stakeholders' Expectations	StarHub's Response
Customers	• Customer surveys (ongoing) • Social media (ongoing) • GreenR Community online forum (regularly) • Customer Service touchpoints (ongoing) • Sustainability Report (annually)	• Seamless, high-quality network coverage • Simplicity and clarity of StarHub's fees and contracts • Cybersecurity and data protection • Enhanced support for customers in light of COVID-19 challenges	• Ongoing investments in infrastructural upgrades • Continued to deliver on our Hello Change brand promise • Active and ongoing monitoring of cybersecurity trends to stay updated on latest developments • Offered a series of promotions and enhanced services to extend additional support to our customers
Employees	• Intranet and StarHub GreenR Community forum (ongoing) • Emails (regularly) • Workshops (regularly) • #HubberHangout Skype Broadcast communication session (fortnightly) • Employee engagement activities, such as webinars and volunteering activities (regularly) • Sustainability Report (annually)	• Career and talent development • Pay and benefits • Work-life balance • Access to communication channels	• Refined an annual Talent and Succession Planning framework and process • Implemented a flexi-benefit scheme in 2020 to cater for employees' needs at different life stages • COVID-19 proactive encouragement of safe work practices at the office and remote working arrangements • Introduced the #HubberHangout Skype Broadcast to address employees and maintain good communication during the COVID-19 work-from-home arrangement
Suppliers	• Company website (ongoing) • Face-to-face meetings (regularly) • Emails (regularly) • Teleconference (regularly) • Sustainability Report (annually)	• Procurement process • Compliance with terms and conditions of purchasing policies, including StarHub's Supplier Code	• Communicating our Supplier Code online • Implemented a Responsible Sourcing Policy • Implemented a Supplier Self-Assessment Questionnaire to guide compliance
Distributors and Retailers	• Face-to-face meetings (regularly) • Shop visits (regularly) • Emails (regularly)	• Timely delivery • Quality assurance • Strong dealer collaboration, driving good customer experience • After-sales support • Offer attractive sales promotions	• Continued to support partners with simplified processes and systems • Provided training and selling tools • Enhanced the service offerings in line with those provided at StarHub Shops • Introduced Salesforce tools to further improve our channel management in the Mobile Prepaid business

Stakeholder Group	Engagement Method & Frequency	Stakeholders' Expectations	StarHub's Response
Business Partners	• Teleconference (regularly) • Sustainability Report (annually)	• Business opportunities partnership	• Explored partnerships to seek mutually beneficial business opportunities
Investors	• Financial reports and disclosures (regularly) • Annual Report (annually) • Announcements via SGXNet (timely) • Annual General Meeting (annually) • Combined analyst and media briefing for Full Year results announcements, with webcast available for public participation (annually) • Combined analyst and media results update call (quarterly) • Investor conferences (regularly) • Investor meetings and non-deal roadshows (regularly) • Sustainability Report (annually) • IR contact – email address and phone number listed on IR website	• Transparency, timely information on business performance, strategy, views on operating landscape and business outlook • Timely response to queries	• Continued to actively engage the investment community, including face-to-face investor meetings, prompt response to email and phone queries, regular update meetings with research analysts • Provided timely and comprehensive information to the market, and remained committed to best corporate governance and disclosure practices
Local Communities	• Community outreach programmes (ongoing) • Corporate sponsorships (ongoing) • Sustainability Report (annually)	• Addressing social needs, including digital inclusion and employability • Providing support during COVID-19, especially during the period of movement control measures implemented by the government	• Regularly reviewing community needs • Partnering with VWOs • Investing in community projects to support underprivileged youths and families • Organised ground-up initiatives to help vulnerable groups affected by COVID-19
Media	• Media events / briefings • Media releases (regularly) • Media responses (timely) • Annual Report (annually) • Corporate Governance Report (annually) • Sustainability Report (annually) • Media contact - email address listed on corporate website	• Exposure and access to company developments and news as well as breaking stories on products, services, entertainment and related content	• Provided dedicated media contacts, and offering timely and accurate information on company affairs of public interest

SUSTAINABILITY REPORT

Stakeholder Group	Engagement Method & Frequency	Stakeholders' Expectations	StarHub's Response
Government and Regulators	• Face-to-face meetings (regularly) • Consultation sessions (regularly) • Calls for Proposals (regularly) • Sustainability Report (annually)	• Compliance with regulations, including providing a resilient service for our customers • Support in digital readiness, online safety, narrowing digital divide	• Complied with regulatory requirements, including relevant audits on our infrastructure • Participated and served as a member of the Digital Readiness Network
Trade Unions	• Face-to-face meetings (regularly) • Informal/formal consultations (regularly) • Sustainability Report (annually)	• Access to employees for promoting membership • Open and honest dialogue with management • Knowledge sharing and capacity building	• Signed MOU with SISEU • Signed MOU with NTUC • Offering union members-only promotions for lower-income groups
Non-Governmental Organisations (NGO) and Advocacy Groups	• Meetings (regularly) • Conferences (regularly) • Sustainability Report (annually)	• Responsible business practices • Reducing environmental impact • Disclosing information about our sustainability performance	• Developed plans to set science-based GHG emissions targets • Supported the GRI Regional Hub as a member of the founding consortium
The Board and SLT	• Board or Board Committee meetings (regularly) • StarHub Board Portal Quarterly reports (quarterly) • Business reports and updates (regularly) • Emails • Annual General Meeting and the Extraordinary General Meeting (annually)	• Access to relevant information and up-to-date policies • Receive complete, adequate and timely information • Develop sound strategies	• Conducted orientation programme for newly-appointed Directors • Provided continual training and development • Conducted network and technology briefing

Membership and Associations in 2020

102-12, 102-13

American Chamber of Commerce in Singapore
Asia Pacific Network Information Centre
Asia Video Industry Association
Association of Certified Fraud Examiners
Association of Chartered Certified Accountants
British Chamber of Commerce Singapore
Chartered Institute of Management Accountants
Chartered Secretaries Institute of Singapore
CONEXUS Mobile Alliance
Contact Centre Association of Singapore
CPA Australia
Digital Readiness Network
Disaster Recovery Institute International
Global Compact Network Singapore
Global Reporting Initiative Regional ASEAN Hub-Founding
     Consortium
GSMA
IMDA's 5G Workforce Transformation Committee
Information Systems Audit and Control Association
Institute of Service Excellence at SMU

Institute of Singapore Chartered Accountants
Intelligent Transportation Society Singapore
International Information System Security Certification
     Consortium
National Sustainable Procurement Roundtable
Promax Asia
Project Management Institute
Scrum Alliance
SGTech - Smart Nation Chapter
Singapore Academy of Law
Singapore Advanced Research & Education Network
Singapore Association of the Institute of Chartered Secretaries
     and Administrators
Singapore Business Federation
Singapore Chinese Chamber of Commerce & Industry
Singapore Computer Society
Singapore Corporate Counsel Association
Singapore Hotel Association
Singapore Institute of Directors
Singapore International Chamber of Commerce
Singapore National Employers' Federation
Wireless Broadband Alliance

APPENDIX
StarHub Value Creation Scorecard

Performance Indicators	FY2020	FY2019	FY2018
Environmental			
CO_2e emissions for Scope 1+2 (tonnes)	**55,438**	60,750	61,426
Carbon emission intensity per $million revenue (tonnes CO_2e)[29]	**27.3**	26.1	26.0
Energy intensity per $million revenue (gigajoules)	**246**	225	219
Electricity used (million kWh)	**137**	144	142
Energy consumption (gigajoules)	**499,060**	525,420	517,304
Water consumption (megalitres)	**9.65**	21.78	24.70
General waste (non-hazardous) (tonnes)	**17.6**	35	46
Internal e-waste recycled (tonnes)	**49.1**	387	213
Paper recycled (tonnes)	**1.8**	8.9	17.8
Social			
Employees			
Permanent employees	**1,686**	2,016	2,216
Local employees (% of Singapore citizens)	**74**	70	73
New hires	**213**	450	358
Female employees (%)	**43**	42	41
Female managers (% of Senior level)	**35**	36	37
Female managers (% of Middle level)	**36**	35	36
Female Heads of Department (% of HODs)	**20**	37	36
Average training hours per employee	**9.4**	14	19
Training expenditure per employee ($)	**238**	421	618
Employee turnover rate[30] (%)	**29**	24	32
Number of reported work injuries	**2**	3	1
Fatal accidents	**0**	0	0
Community			
Employee volunteerism participation (%)	**4**	7	3
Community investment and donations to charities ($million)	**1.7**	1.0	0.8
Governance & Marketplace			
Revenue ($million)	**2,029**	2,331	2,362
Net profit ($million)	**158**	179	201
Dividends paid to shareholders ($million)	**82**	186	277
Suppliers			
Share of local suppliers as percentage of total procurement spend[31] (%)	**95**	93	86
Proportion of local suppliers[31]	**90**	88	89

Materiality Assessment
102-15, 102-46, 102-47

We followed the principle of materiality as set out in the GRI Standards, undertaking a five-stage approach.

Topic Identification:
Conducted desk-based research and a benchmarking exercise to identify any new topics that may have emerged since StarHub's latest materiality assessment in 2017. This stage filtered out topics that were not relevant and produced a list of 15 topics that were taken forward for prioritisation.

Topic Prioritisation:
Launched an internal and external stakeholder survey to prioritise (using the Likert scale of 1-5) and rank the list of 15 topics based on what are most important for StarHub to manage.

Interviews:
Conducted interviews with the SLT at StarHub and key external stakeholders to gather additional context and insights into the important issues facing StarHub and the industry.

Results Analysis:
Consolidated the information gathered and analysed the results to produce a preliminary matrix.

Validation:
Validated the materiality results with the SLT and the Board.

During the materiality assessment, we aimed to get balanced views from representatives of our most important stakeholder groups, namely StarHub employees, enterprise customers, government/regulators, investors, media, NGOs and suppliers. In the future, we will continue to review our material topics on a regular basis.

29   Carbon emission intensities for 2019 and 2018 are restated to include only Scope 1 and 2 emissions.
30   Figures include voluntary and involuntary turnover, including all employees who left the company during the reporting period.
31   Figures for all procurement spend during the reporting period, with or without PO, excluding those related to content acquisition. Suppliers are classified as local if the purchase is made from an entity located in Singapore.

SUSTAINABILITY REPORT

UN Global Compact (UNGC) – Communication on Progress (COP)

StarHub has been a signatory member of the UNGC since 2012. Progressively, we have taken appropriate actions to incorporate the ten principles in the way we conduct business. Progress on the implementation of the ten principles is provided in the sections of this report indicated below.

CEO Statement

StarHub reaffirms our support of the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption.

Our sustainability report serves as our annual COP, describing our actions to continually improve the integration of the UNGC and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Key Areas	Principles		Reference
Human Rights	Principle 1:	Businesses should support and respect the protection of internationally proclaimed human rights; and	Pages 153-154
	Principle 2:	make sure that they are not complicit in human rights abuses.	Pages 153-154
Labour	Principle 3:	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	Pages 153-154
	Principle 4:	the elimination of all forms of forced and compulsory labour;	Pages 153-154
	Principle 5:	the effective abolition of child labour; and	Pages 153-154
	Principle 6:	the elimination of discrimination in respect of employment and occupation.	Pages 143-145, 153-154
Environment	Principle 7:	Businesses should support a precautionary approach to environmental challenges;	Pages 121, 153-154
	Principle 8:	undertake initiatives to promote greater environmental responsibility; and	Pages 122-130
	Principle 9:	encourage the development and diffusion of environmentally friendly technologies.	Pages 122-130
Anti-Corruption	Principle 10:	Businesses should work against corruption in all its forms, including extortion and bribery.	Pages 153-154

Description and Boundary of StarHub's Material Sustainability Topics

Topic	Description	Suppliers	Infrastructure	Operations	Products	Customers
Protecting the Environment						
Energy and GHG Emissions	Improving energy efficiency within our operations, increasing the use of renewable energy and reducing our GHG emissions.	X	X	X	X	
Climate Change Adaptation	Building our business and infrastructure resiliency against the impact of climate change, including physical and regulatory risks.	X	X	X	X	
Waste Management	Enabling the reduction, reuse and recycling of waste, especially e-waste, within our operations and the community.	X	X	X	X	X
Water Use	Reducing the amount of water consumed in our operations and improving water efficiency.		X	X		

Topic	Description	Suppliers	Infrastructure	Operations	Products	Customers
Enabling a Digital Society						
Product and Service Quality	Maintaining the highest level of product and service quality and reliability to establish trust and enhance customer experience.	X			X	
Cybersecurity and Data Privacy	Ensuring adequate systems and processes are put in place to prevent cyber breaches and leaks, respecting the rights to data privacy of our employees and customers.	X	X	X	X	X
Online Safety	Creating awareness and implementing measures to protect the safety of our online users, especially vulnerable groups such as children.					X

SUSTAINABILITY REPORT

Topic	Description	Suppliers	Infrastructure	Operations	Products	Customers
Caring for Our People and Communities						
Talent Management	Attracting highly-skilled individuals, engaging our employees and providing training and development opportunities to build a high-performing organisation.			X		
Workplace Equality, Diversity and Inclusion	Promoting a culture of diversity and equal opportunity, free from discrimination on the basis of age, race, gender identity, sexual orientation, disability, religion, family or marital status.			X		
Employee Health and Safety	Creating a work environment that promotes the health of our employees and ensures their safety.	X		X		
Investing in Local Communities	Investing in the communities in which we operate, particularly in supporting disadvantaged groups in the areas of digital inclusion and employability.			X		X

Topic	Description	Suppliers	Infrastructure	Operations	Products	Customers
Responsible Business Practices						
Business Conduct and Ethics	Conducting our business activities responsibly, upholding the highest standards of ethics and integrity.	X		X		X
Supply Chain Management	Implementing responsible procurement practices and managing our supply chain impact through supplier engagement and collaboration.	X				
Public Health and Safety	Adhering to best-practice safety standards and regulations, while staying up-to-date with the latest research and findings on RF emissions risks.		X		X	X
Responsible Marketing and Selling	Marketing and advertising our products and services responsibly and ensuring clarity of our pricing and billing.			X		X

Independent Limited Assurance Report

To the Directors of StarHub Ltd

We were engaged by the Board of Directors of StarHub Ltd (the Company) to provide limited assurance on the accompanying StarHub Sustainability Report 2020 for the year ended 31 December 2020 (the Report), as set on pages 108 to 164, and the selected Global Reporting Initiative Sustainability Reporting Standards disclosures (Selected GRI Disclosures) as identified below.

Conclusion

Based on the evidence we obtained from the procedures performed as described in the *Auditors' Responsibilities* section of our report, nothing has come to our attention that causes us to believe that:

(a)   the Report has not described the sustainability practices on a comply-or-explain basis with reference to the following components as listed under Rule 711B of the Singapore Exchange's (SGX) Listing Manual:
  – Material environmental, social and governance factors;
  – Policies, practices and performance;
  – Targets;
  – Sustainability reporting framework; and
  – Board statement;

(b)   the Selected GRI Disclosures as identified in the table below, are not presented, in all material respects, in accordance with the relevant topic-specific disclosures requirements in the Global Reporting Initiative Sustainability Reporting Standards (GRI Standards); and

(c)   the Selected GRI Disclosures as identified in the table below, are not calculated, in all material respects, in accordance with the relevant topic-specific disclosures requirements in the GRI Standards.

Material Topic	GRI Standards	Topic-specific Disclosure	Selected GRI Disclosures
Energy	GRI 302-1	Energy consumption within the organisation	497,759 gigajoules (GJ)
	GRI 302-2	Energy consumption outside of the organisation	1,301 gigajoules (GJ)
	GRI 302-3	Energy intensity	246 GJ per $million revenue (including Exclusive Partners)
	GRI 302-4	Reduction of energy consumption	5%
Water Use	GRI 303-3	Water withdrawal	9.65 megalitres
Greenhouse Gases (GHG) Emissions	GRI 305-1	Direct (Scope 1) GHG emissions	2,103 tonnes CO_2e
	GRI 305-2	Energy indirect (Scope 2) GHG emissions (location-based)	55,949 tonnes CO_2e
	GRI 305-2	Energy indirect (Scope 2) GHG emissions (market-based)	53,335 tonnes CO_2e
	GRI 305-3	Other indirect (Scope 3) GHG emissions	8,658 tonnes CO_2e
	GRI 305-4	GHG emissions intensity	27.3 tonnes CO_2e per $million revenue
Waste Management	GRI 306-2	Waste by type and disposal method	Internal e-waste recycled: 49.1 tonnes Paper recycled: 1.8 tonnes Non-hazardous general waste disposed: 17.6 tonnes

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Material Topic	GRI Standards	Topic-specific Disclosure	Selected GRI Disclosures			
Talent Management	GRI 401-1	New employee hires and employee turnover	**Gender**	**Male**	**Female**	**Total**
			Number of new hires	124	89	213
			Rate of new hires	12%	12%	12%
			Number of turnover	325	192	517
			Rate of turnover	32%	25%	29%
			Age Group	**< 30**	**30-50**	**> 50**	**Total**
			Number of new hires	51	153	9	213
			Rate of new hires	24%	11%	5%	12%
			Number of turnovers	89	388	40	517
			Rate of turnover	41%	28%	20%	29%

Material Topic	GRI Standards	Topic-specific Disclosure		Male	Female
Talent Management	GRI 404-1	Average hours of training per year per employee		**Male**	**Female**
			Senior Management	11.89	13.05
			Middle Management	12.06	12.58
			Function Employees	8.06	9.08
			Overall	9.12	9.78

Material Topic	GRI Standards	Topic-specific Disclosure	Gender	Male	Female
Workplace Equality, Diversity and Inclusion	GRI 405-1	Diversity of governance bodies and employees	**Gender**	**Male**	**Female**
			Board	75%	25%
			Senior Management	68%	32%
			Middle Management	64%	36%
			Function Employees	55%	45%
			Overall Workforce (excl. Board)	57%	43%

	Age Group	**< 30**	**30-50**	**> 50**
	Board	0%	17%	83%
	Senior Management	0%	71%	29%
	Middle Management	0%	84%	16%
	Function Employees	16%	75%	9%
	Overall Workforce (excl. Board)	12%	77%	11%

Ethnic Group	**Chinese**	**Malay**	**Indian**	**Others**
Board	42%	0%	16%	42%
Senior Management	75%	0%	6%	19%
Middle Management	84%	1%	8%	7%
Function Employees	71%	9%	5%	15%
Overall Workforce (excl. Board)	73%	7%	6%	14%

Material Topic	GRI Standards	Topic-specific Disclosure	Selected GRI Disclosures		
Workplace Equality, Diversity and Inclusion	GRI 405-2	Ratio of the basic salary and remuneration of women to men	**Ratio of Base Salary**	**Female**	**Male**
			Senior Management	1.00	1.11
			Middle Management	1.00	1.00
			Function Employees	1.00	1.02
			Overall	1.00	1.13
Employee Health and Safety	GRI 403-9	Work-related injuries	**Workplace Injury Frequency Rate**	**2020**	
			Number of Workplace Accidents	2	
			Workplace Injury Frequency Rate	0.6	
			Workplace Injury Severity Rate	**2020**	
			Number of Man Days Lost	6	
			Workplace Injury Severity Rate	1.7	
			Workplace Injury Incidence Rate	**2020**	
			Number of Workplace Injuries	2	
			Workplace Injury Incidence Rate	112	
			Workplace Fatalities	**2020**	
			Number of Workplace Fatalities	0	
			Occupational Disease	**2020**	
			Number of Occupational Disease Incidences	0	
Investing in Local Communities	GRI 204-1	Proportion of spending on local suppliers	Share of local suppliers as a percentage of total supplier payments: 95%		
			Proportion of local suppliers as a percentage of total suppliers: 90%		

Basis for Conclusion

We conducted our limited assurance engagement in accordance with Singapore Standard on Assurance Engagement 3000 *Assurance Engagements other than Audits or Reviews of Historical Financial Information* (SSAE 3000). Our responsibilities are further described in the Auditors' Responsibilities section of our report.

We have complied with the independence and other ethical requirements of the Accounting and Corporate Regulatory Authority (ACRA) *Code of Professional Conduct and Ethics for Public Accountants and Accounting Entities* (ACRA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies *Singapore Standard on Quality Control 1* and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

SUSTAINABILITY REPORT

Responsibilities of Management

Management is responsible for:

– preparing and presenting the Report in accordance with the GRI Standards and Rule 711B of the SGX Listing Manual, and the information and assertions contained within it;

– determining StarHub's objectives in respect of sustainable development performance and reporting, including the identification of stakeholders and material issues;

– establishing and maintaining appropriate internal control systems that enable the preparation and presentation of the Report and the selected GRI disclosures that are free from material misstatement, whether due to fraud or error;

– preventing and detecting fraud and for identifying and ensuring that the Company complies with laws and regulations applicable to its activities; and

– ensuring that staff involved with the preparation and presentation of the Report are properly trained, information systems are properly updated and that any changes in reporting encompass all significant reporting units.

The directors' responsibilities include overseeing the Company's sustainability reporting process.

Auditors' Responsibilities

Our responsibility is to carry out a limited assurance engagement in accordance with SSAE 3000 and to express a conclusion based on the work performed. SSAE 3000 requires that we plan and perform the engagement to obtain limited assurance about whether the Report is free from material misstatement. The extent of our work performed depends on our professional judgement and our assessment of the engagement risk.

A limited assurance engagement consists of making inquiries, primarily of persons responsible for the preparation of information presented in the Report, and applying analytical and other evidence gathering procedures, as appropriate. These procedures included:

– Inquiries of management to gain an understanding of StarHub's processes for determining the material issues for StarHub's key stakeholder groups;

– Interviews with senior management and relevant staff at group level and selected business unit level concerning sustainability strategy and policies for material issues, and the implementation of these across the business;

– Interviews with relevant staff at the corporate and business unit level responsible for providing the information in the Report;

– Inquiries about the design and implementation of the systems and methods used to collect and report on the GRI Disclosures, including the aggregation of the reported information;

– Comparison of the GRI Disclosures presented in the Report to corresponding information in the relevant underlying sources to determine whether all the relevant information contained in such underlying sources has been appropriately included in the GRI Disclosures; and

– Reading the information presented in the Report to determine whether it is in line with our overall knowledge of, and experience with, the sustainability performance of the Company.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Due to the inherent limitations of any internal control structure it is possible that errors or irregularities in the information presented in the Report may occur and not be detected. Our engagement is not designed to detect all weaknesses in the internal controls over the preparation and presentation of the Report, as the engagement has not been performed continuously throughout the period and the procedures performed were undertaken on a test basis.

Restriction on Use

This report has been prepared for the Directors of StarHub Ltd for the purpose of providing an assurance conclusion on the Report and Selected GRI Disclosures and may not be suitable for another purpose. We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Directors of StarHub Ltd, or for any other purpose than that for which it was prepared.

KPMG LLP
Public Accountants and
Chartered Accountants

Singapore
19 March 2021

GRI Content Index
102-55

This report has been prepared in accordance with the GRI Standards: Core option. The table below presents our GRI content index, which specifies each of the GRI Standards used in this report with references to where the information can be found. Where we were not able to meet the GRI Standards reporting requirements, we have included our reasons for the omission in the table below.

GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
GENERAL DISCLOSURE		
GRI 102: General Disclosures 2016	**Organisational Profile**	
	102-1 Name of the organisation	StarHub Ltd
	102-2 Activities, brands, products, and services	18 -19
	102-3 Location of headquarters	Singapore
	102-4 Location of operations	99, 261
	102-5 Ownership and legal form	282
	102-6 Markets served	18-19, 230-233, 261
	102-7 Scale of the organisation	142
	102-8 Information on employees and other workers	142-145
	102-9 Supply chain	153 - 154
	102-10 Significant changes to the organisation and its supply chain	No significant changes
	102-11 Precautionary Principle or approach	100
	102-12 External initiatives	160, 162
	102-13 Membership of associations	160
	Strategy	
	102-14 Statement from senior decision-maker	113
	102-15 Key impacts, risks, and opportunities	100-105, 114, 161
	Ethics and Integrity	
	102-16 Values, principles, standards, and norms of behaviour	153
	102-17 Mechanisms for advice and concerns about ethics	153
	Governance	
	102-18 Governance structure	115
	102-19 Delegating authority	115
	102-20 Executive-level responsibility for economic, environmental, and social topics	115
	102-21 Consulting stakeholders on economic, environmental, and social topics	157
	Stakeholder Engagement	
	102-40 List of stakeholder groups engaged	157 - 160
	102-41 Collective bargaining agreements	37% of our workforce are members of SISEU
	102-42 Identifying and selecting stakeholders	157
	102-43 Approach to stakeholder engagement	157 - 160
	102-44 Key topics and concerns raised	157 - 160
	Reporting Practice	
	102-45 Entities included in the consolidated financial statements	230-233
	102-46 Defining report content and topic Boundaries	110
	102-47 List of material topics	114
	102-48 Restatements of information	125, 161
	102-49 Changes in reporting	No changes in reporting
	102-50 Reporting period	110

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GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
GENERAL DISCLOSURE		
GRI 102: General Disclosures 2016	102-51 Date of most recent report	StarHub Sustainability Report 2019 published 8 April 2020
GRI 102: General Disclosures 2016	102-52 Reporting cycle	110
	102-53 Contact point for questions regarding the report	110
	102-54 Claims of reporting in accordance with the GRI Standards	110
	102-55 GRI content index	169 - 172
	102-56 External assurance	110, 165 - 168
TOPIC SPECIFIC DISCLOSURES		
PROTECTING THE ENVIRONMENT		
Energy and GHG Emissions		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	122, 123, 163
	103-2 The management approach and its components	122 - 123
	103-3 Evaluation of the management approach	118, 122 - 123
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	124
	302-2 Energy consumption outside of the organisation	124
	302-3 Energy intensity	124
	302-4 Reduction of energy consumption	123
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	125
	305-2 Energy indirect (Scope 2) GHG emissions	125
	305-3 Other indirect (Scope 3) GHG emissions	125
	305-4 GHG emissions intensity	124
Climate Change Adaptation		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	126, 163
	103-2 The management approach and its components	126
	103-3 Evaluation of the management approach	118, 126
Waste Management		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	128-129, 163
	103-2 The management approach and its components	128 -129
	103-3 Evaluation of the management approach	118, 128 - 129
GRI 303: Effluents and Waste 2016	306-2 Waste by type and disposal method	128 Organisational default methods of the waste disposal contractor were used in the determination of the waste disposal method
Water Use		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130, 163
	103-2 The management approach and its components	130
	103-3 Evaluation of the management approach	119, 130
GRI 303: Water and Effluents 2018	303-3 Water withdrawal	130

GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
ENABLING A DIGITAL SOCIETY		
Product and Service Quality		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131-133, 163
	103-2 The management approach and its components	131 -133
	103-3 Evaluation of the management approach	119, 131 - 133
Cybersecurity and Data Privacy		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	138-139, 163
	103-2 The management approach and its components	138 - 139
	103-3 Evaluation of the management approach	119, 138 - 139
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	139
Online Safety		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	139, 163
	103-2 The management approach and its components	139
	103-3 Evaluation of the management approach	119, 139
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	139
CARING FOR OUR PEOPLE & COMMUNITIES		
Talent Management		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	140-142, 164
	103-2 The management approach and its components	140 - 142
	103-3 Evaluation of the management approach	120, 140 - 142
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	142 Data is not broken down by region since all employees are based in Singapore.
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	141
	401-3 Parental leave	145
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	143, 161
Workplace Equality, Diversity and Inclusion		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	143-145, 164
	103-2 The management approach and its components	143 - 145
	103-3 Evaluation of the management approach	120, 143 - 145
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	144 - 145
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	143

GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
Employee Health and Safety		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	146-147, 164
	103-2 The management approach and its components	146 - 147
	103-3 Evaluation of the management approach	120, 146 - 147
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	147 Omission: Occupational Health and Safety data for our contractors is not currently tracked by StarHub.
Investing in Local Communities		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	148-151, 164
	103-2 The management approach and its components	148 - 151
	103-3 Evaluation of the management approach	118, 148 - 151
GRI 413: Local communities 2016	413-1 Operations with local community engagement, impact assessments, and development programmes	134 - 137, 148 - 151
RESPONSIBLE BUSINESS PRACTICES		
Business Conduct and Ethics		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	153, 164
	103-2 The management approach and its components	153
	103-3 Evaluation of the management approach	120, 153
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	153
GRI 206: Anti-competitive Behaviour	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	153
Public Health and Safety		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	153, 64
	103-2 The management approach and its components	153
	103-3 Evaluation of the management approach	118, 153
GRI 416: Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	153
Supply Chain Management		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	153-154, 164
	103-2 The management approach and its components	153 - 154
	103-3 Evaluation of the management approach	118, 153 - 154
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	153
Responsible Marketing and Selling		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	154 - 156, 164
	103-2 The management approach and its components	154 - 156
	103-3 Evaluation of the management approach	120, 154 - 156
GRI 417: Marketing and Labelling 2016	417-2 Incidents of non-compliance concerning product and service information and labelling	156

SASB Disclosure Index

TELECOMMUNICATION SERVICES			
SASB Code	**Metric Description**	**2020**	**Page Reference**
Activity Metric			
TC-TL-000.A	Number of wireless subscribers	1.9M	18
TC-TL-000.B	Number of wireline subscribers	273K	–
TC-TL-000.C	Number of broadband subscribers	498K	18
TC-TL-000.D	Network traffic (Petabytes)	2,793	–
Environmental Footprint of Operations			
TC-TL-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	499,060 gigajoules Grid: 94.4% Renewable: 4.6%	124
Data Privacy			
TC-TL-220a.1	Description of policies and practices relating to behavioural advertising and customer privacy	Refer to report	154 - 156
TC-TL-220a.2	Number of customers whose information is used for secondary purposes	0	–
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	0	–
TC-TL-220a.4	(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure	–	Not able to provide due to confidentiality obligations.
Data Security			
TC-TL-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected	3 100% 3	139
TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Refer to report	138 - 139
Product End-of-life Management			
TC-TL-440a.1	(1) Materials recovered through takeback programmes, percentage of recovered materials that were (2) reused, (3) recycled, and (4) landfilled	Internal e-waste: 49 tonnes External e-waste: 171 tonnes Reuse: 0% Recycled: 100% Landfilled: 0%	128 - 129
Competitive Behaviour & Open Internet			
TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	0	153
TC-TL-520a.2	Average actual sustained download speed of (1) owned and commercially-associated content and (2) non-associated content	The speeds are non-specific to our owned content or other non-associated content.	–
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices	Refer to report	153

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SASB Code	Metric Description	2020	Page Reference
Managing Systemic Risks from			
TC-TL-550a.1	(1) System average interruption frequency and (2) customer average interruption duration	System average interruption frequency not available. Customer average interruption duration: 0.319322 hours Customer average interruption duration = total unplanned interruption duration (hours) / total subscription	132
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	Refer to report	126, 132, 139