

SUSTAINABILITY CONTENTS

INTRODUCTION

- 96 About this Report**
- 97 FY2019 Performance Highlights**
- 98 Sustainability at StarHub**
- 98 Board Statement on Sustainability
- 99 Our Sustainability Strategy
- 100 Materiality
- 101 Sustainability Targets
- 102 Supporting the United Nations Sustainable Development Goals
- 104 Sustainability Governance

ENVIRONMENT

- 105 Addressing Environmental Challenges**
- 106 Managing Public E-Waste
- 107 Addressing Climate Change and Resource Management
- 110 Promoting Environmental Awareness

SOCIAL

- 111 Investing in Our People**
- 112 Talent Management
- 114 Workplace Equality, Diversity and Inclusion
- 115 Employee Health and Safety
- 116 Investing in Our Community**

GOVERNANCE & MARKETPLACE

- 120 Being a Responsible Business**
- 120 Business Conduct and Ethics
- 121 Supply Chain Management
- 121 Online Safety
- 122 Public Health and Safety
- 122 Improving Customer Experience**
- 122 Cybersecurity and Data Privacy
- 123 Responsible Marketing and Selling
- 124 Product and Service Quality
- 125 Engaging with Our Stakeholders**

APPENDIX

- 128 StarHub Value Creation Scorecard
- 129 Membership and Associations in 2019
- 129 Materiality Assessment
- 132 Independent Limited Assurance Report
- 136 GRI Content Index



SUSTAINABILITY REPORT

INTRODUCTION

ABOUT THIS REPORT

102-52

The StarHub Board of Directors (the Board) is pleased to present StarHub's Sustainability Report 2019. This is our ninth annual sustainability report and highlights our commitment and progress on integrating sustainability practices across our operations. Through this report, we provide an account of our ambitions, performance and challenges.

Reporting Period and Scope

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 D'Crypt Pte Ltd and Ensign InfoSecurity Pte. Ltd. (Ensign) – new subsidiaries acquired in 2018), during our financial year 2019 (1 January to 31 December 2019).

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 at the end of this report. Please go to pages 136-140.

We have followed the GRI principles for defining the content and quality of this report. We have determined this report's content using the principles of stakeholder inclusiveness, sustainability context, materiality and completeness. To ensure the quality of this report, we have applied the principles of accuracy, balance, clarity, comparability, reliability and timeliness.

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 Environmental, Social and Governance (ESG) disclosures in this report to provide our readers with greater confidence on the accuracy of the information included. Please go to pages 132-135 for the assurance statement and scope of data assured. The findings from the assurance process were shared with StarHub's Board.

Feedback

102-53

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

FY2019 PERFORMANCE HIGHLIGHTS



ENVIRONMENT



174 tonnes

of **electronic waste (e-waste)** collected through 440 RENEW (REcycling the Nation's Electronic Waste) bins provided nationwide



2%

of **energy procured** from renewable sources

23%

reduction in direct fuel consumption from non-renewable sources



400,000

students and teachers participated in the SEC - StarHub School Green Awards (SGA), which was designed to raise awareness on environmental issues



SOCIAL



29,522 hours

of **training** provided to our employees, reaching

71.3%

of our workforce



25%

of Board members are **female**

42%

of our workforce are **female**



>\$1M

donated to

15 voluntary welfare organisations (VWOs) and non-profit organisations



GOVERNANCE & MARKETPLACE



Winner

of the **Most Transparent Company** Award for the Communications category

Runner Up

for the **Shareholder Communication Excellence** Award for the Big Cap category at the Securities Investors Association Singapore (SIAS) 20th Investors' Choice Awards



Ranked 17th

out of 578 Singapore-listed companies in the Singapore Governance and Transparency Index (SGTI)



106

StarHub Consumer & Channel Sales personnel received the Singapore Retailers Association Excellent Service Award



Rated **Singapore's Fastest Telco** in Infocomm Media Development Authority's (IMDA) IMconnected 1H2019 report; 4G peak speeds

60% faster than other networks

SUSTAINABILITY REPORT

SUSTAINABILITY AT STARHUB

StarHub recognises that the world is changing rapidly. Innovations and new technologies are driving changes that impact all of us in a myriad of ways. The services we provide are important engines of growth for the economy, and help to connect people, businesses and entire systems. At the same time, we also understand the unintended consequences that can arise if we do not manage our business activities with all our stakeholders in mind.

As an info-communications company, we are in a unique position to leverage technology to drive positive change. This is why we have made it our mission to help foster a society where everyone can benefit from digital transformation. Our commitment to be a responsible and sustainable business is at the very heart of this.

In 2018, we began a strategic transformation plan to integrate sustainability within our wider business strategy and objectives. As part of this process, we redefined what sustainability means to us through a set of five clear ambitions. These ambitions are based on the material ESG factors that drive long-term value for our business and our stakeholders.

Board Statement on Sustainability

The Board is committed to responsible and sustainable practices across all our operations. The Board considers sustainability to be an integral part of StarHub's long-term strategic direction, and 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.

Every year, the Board reviews potential ESG topics to determine which are material to our business. This year, we have conducted a refreshed materiality assessment and identified 15 relevant ESG topics, which were reviewed and approved by the Board.



Nurturing our next generation.

Our Sustainability Strategy:



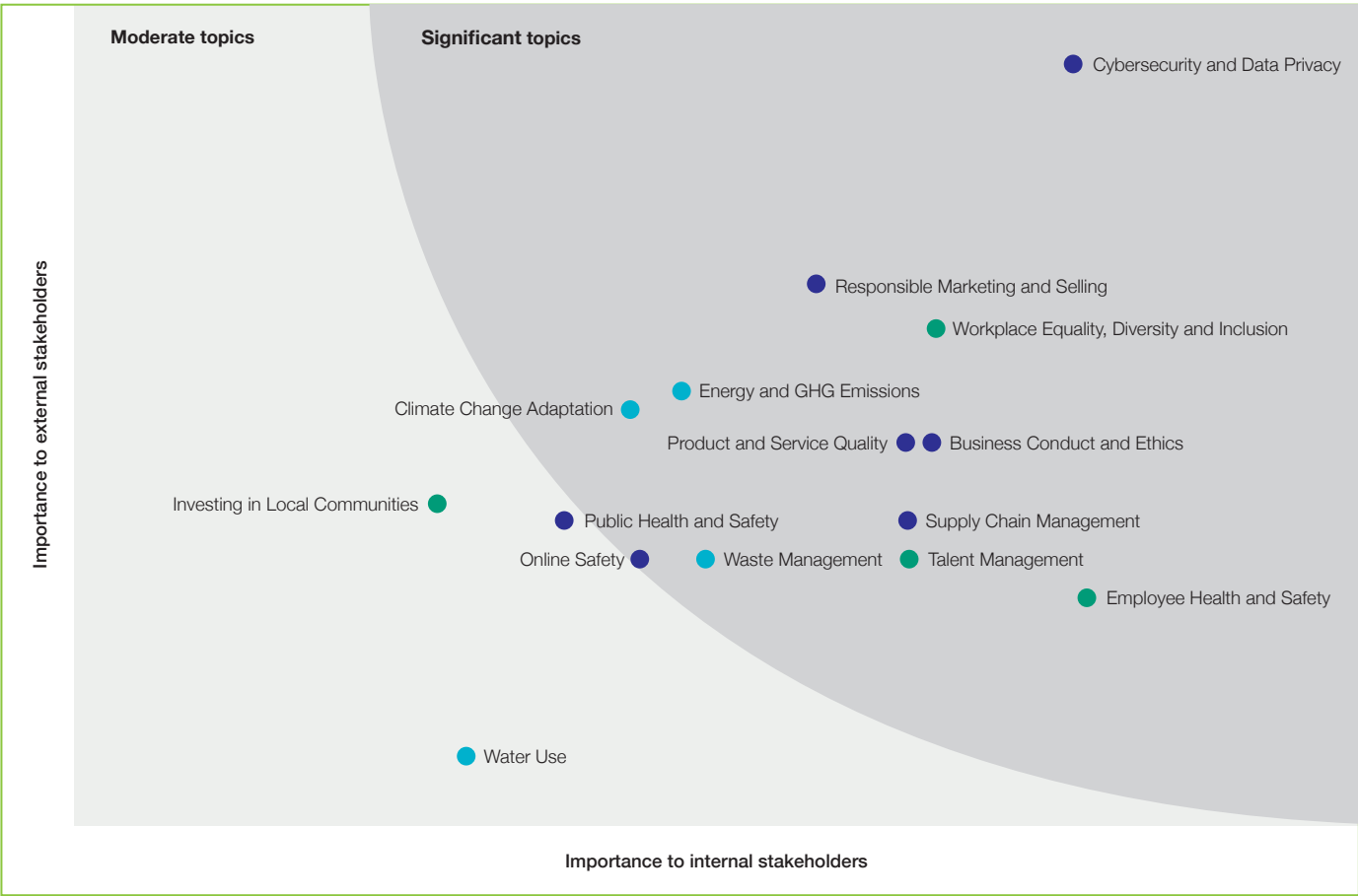
This strategy guides our approach to embedding sustainable business practices in every part of our business and creating long-term value for all stakeholders. It is underpinned by action plans, with key performance indicators and targets, that drive continuous performance improvement. Collaboration and engagement with stakeholders is also a key part of our approach to ensure we deliver on our commitments. Monitoring and reporting our progress against this strategy forms the basis of our sustainability report, which is important for the accountability and transparency that our stakeholders expect of us.

SUSTAINABILITY REPORT

Materiality
102-15, 102-46, 102-47, 103-1

In 2019, we worked with specialist sustainability consulting firm Corporate Citizenship to refresh our materiality assessment. The aim of this exercise was to ensure that as an organisation, we continue 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. The stakeholders we consulted include customers, employees, suppliers, media, investors, government and regulators, and non-governmental organisations (NGOs). For details of our approach to materiality, please go to page 129 of this report.

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.

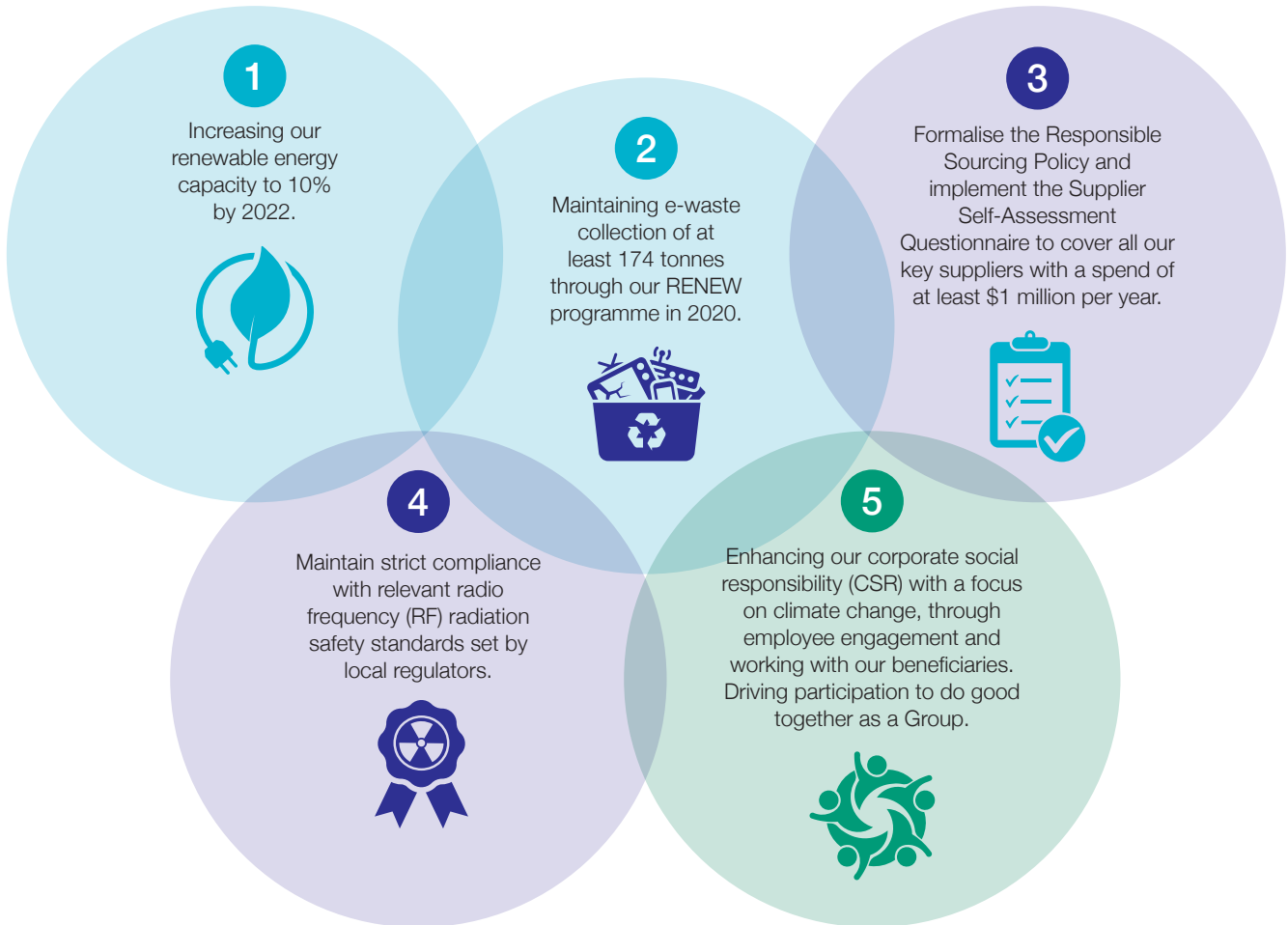
Moderate topics:
Topics that are of relatively lower significance but still form part of StarHub's overall responsible business practices. These are managed and reported as part of our general sustainability approach.

- Environment
- Social
- Governance & Marketplace

Our new list of priority sustainability topics reflects the changing trends and evolving stakeholder expectations in our industry. The latest materiality assessment highlighted Supply Chain Management as a new priority topic, and also indicated that Workplace Equality, Diversity and Inclusion, Climate Change Adaptation, as well as Energy and GHG Emissions are topics with increasing importance.

Sustainability Targets

The five multi-year sustainability targets, forming the main approach of our sustainability strategy, that we will commit to in 2020 are:



The short-term targets for 2020 in relation to each identified material ESG topic are set out in the respective sections of this report.

Apart from the above targets, we will be determining our GHG emissions baseline in 2020, with a view to set a Science Based Targets initiative-approved target, aligned with Temasek's vision to reduce GHG emissions.

SUSTAINABILITY REPORT

Supporting the United Nations Sustainable Development Goals (SDGs)

Adopted in 2015, the SDGs represent an ambitious global agenda to achieve a sustainable future by 2030. The SDGs are universal and every country, including Singapore, is committed to sustainable development. StarHub is also committed to playing our part in meeting the global sustainable development agenda.

While our business will touch on all 17 interrelated SDGs, we have identified eight priority goals in which we believe we have an opportunity to make the biggest impact through our core business operations, products and services, as well as leveraging our strengths to collaborate and partner with others.

SDG	StarHub's Material ESG Topics	
	Goal 5 Achieve gender equality and empower all women and girls	<ul style="list-style-type: none"> • Workplace Equality, Diversity and Inclusion
	Goal 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	<ul style="list-style-type: none"> • Talent Management • Employee Health and Safety • Supply Chain Management • Product and Service Quality
	Goal 9 Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation	<ul style="list-style-type: none"> • Online Safety • Cybersecurity and Data Privacy • Product and Service Quality
	Goal 10 Reduce inequality within and among countries	<ul style="list-style-type: none"> • Workplace Equality, Diversity and Inclusion • Investing in Local Communities • Supply Chain Management
	Goal 11 Make cities and human settlements inclusive, safe, resilient and sustainable	<ul style="list-style-type: none"> • Product and Service Quality • Climate Change Adaptation • Waste Management
	Goal 12 Ensure sustainable consumption and production patterns	<ul style="list-style-type: none"> • Energy and GHG Emissions • Water Use • Waste Management • Supply Chain Management • Public Health and Safety
	Goal 13 Take urgent action to combat climate change and its impacts	<ul style="list-style-type: none"> • Climate Change Adaptation • Energy and GHG Emissions
	Goal 17 Strengthen the means of implementation and revitalise the global partnership for sustainable development	Partnership Programmes for: <ul style="list-style-type: none"> • Waste Management • Climate Change Adaptation

The SDGs in Action



Goal 12 – Responsible Consumption and Production

Responsible consumption and production are important for preserving the health of our planet and ensure we do not deplete the natural resources we rely on. StarHub is constantly exploring new ways to adopt responsible consumption and production practices.

Since the implementation of our strategic transformation plan in 2018, which includes our operational efficiency programme, we marked a year-on-year reduction in water consumption of more than 10%.

▶ [Go to page 109 for more details.](#)

StarHub also launched the 'Skip the Bag' initiative across all our shops in a bid to reduce packaging waste. We encourage customers to 'Go Green with StarHub' by not taking a StarHub carrier bag for their purchases.

▶ [Go to page 109 for more details.](#)

Since 2012, we have been running RENEW, our flagship e-waste recycling programme in collaboration with partners from the private sector, government and the local community. We have achieved an annual increase of more than 36% in the amount of e-waste collected in recent years, bringing the total amount to 174 tonnes in 2019.

▶ [Go to page 106 for more details.](#)



Goal 13 – Climate Action

Rising GHG emissions and the impact of climate change are being felt more acutely, worsening at a much faster rate than anticipated. To avoid catastrophic consequences, a coordinated global response to climate change is required. Singapore has recently pledged to peak its absolute GHG emissions by 2030, halve its 2030 peak emissions by 2050, and achieve net zero emissions as soon as it is viable in the second half of the century. StarHub is also committed to doing our part to support this initiative.

In line with our commitment to increase our renewable energy usage to 10% by 2022, we have purchased 2,850 megawatt-hours of Renewable Energy Certificates (RECs). This increased the proportion of our energy consumption from renewable sources to nearly 2% in 2019, thereby reducing our carbon emissions¹.

▶ [Go to page 107 for more details.](#)

To ensure our operations are resilient to the impact of climate change, including rising sea levels, floods and intense storms, we conducted an infrastructure audit. The results confirmed the ability of our network, operations and facilities to withstand extreme weather events.

▶ [Go to page 107 for more details.](#)

StarHub also partnered with the Singapore Environment Council (SEC) to support the SGA for six consecutive years, to help advance the climate change agenda. The programme has saved 380,000 tonnes CO₂e of GHG emissions in the last five years.

▶ [Go to page 110 for more details.](#)

¹ Based on the GHG Protocol market-based reporting method.

SUSTAINABILITY REPORT

Sustainability Governance

102-18, 102-19, 102-20

The Board has overall responsibility for overseeing StarHub's sustainability efforts. Our sustainability governance structure extends from the Board, to the Board Risk Committee, Management Risk Committee, Corporate Sustainability Advocate function and cross-functional representatives.

Sustainability Governance Structure

1

THE BOARD

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.

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 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.



ENVIRONMENT

ADDRESSING ENVIRONMENTAL CHALLENGES

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 impact on the environment. We also recognise the role we play in helping our employees, customers and communities to adopt environmentally conscious behaviours.



Green learning experience out and about.

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

OUR ENVIRONMENTAL STEWARDSHIP STRATEGY

1

Managing Public E-waste

Tackling public e-waste, by providing e-waste collection points and encouraging recycling.

2

Addressing Climate Change and Resource Management

Striving for energy-efficient operations and adopting energy-saving technologies, while consistently monitoring and implementing initiatives to reduce energy and water consumption and waste generation.

3

Promoting Environmental Awareness

Raising awareness and promoting actions to combat climate change and protect the environment through community engagement.

SUSTAINABILITY REPORT

Managing Public E-waste

103-1, 103-2, 103-3

TARGET:

Maintaining e-waste collection of at least 174 tonnes through our RENEW programme in 2020.

About 60,000 tonnes of e-waste are generated in Singapore annually². The incineration of e-waste results in the loss of valuable resources and releases GHG emissions into the atmosphere, thereby contributing to climate change. Toxic substances from e-waste may also leak into the environment if not managed properly. As a business dealing with electronic products and services, StarHub has an important role to play in supporting the reduction of e-waste sent to landfills, which are a result of our operations and the actions of the wider community.

To encourage the recycling of e-waste, we initiated our flagship e-waste recycling programme, RENEW, in 2012, to provide

avenues for consumers to recycle their e-waste. Since 2014, the amount of e-waste collected through our RENEW programme has increased exponentially, at more than 36% year-on-year. Since the launch of the programme, we have cumulatively collected more than 500 tonnes of e-waste. In 2019 alone, we collected 174 tonnes of e-waste, which was 38% more than in 2018. As of 31 December 2019, StarHub provided 440 designated bins across 395 locations nationwide for e-waste collection.

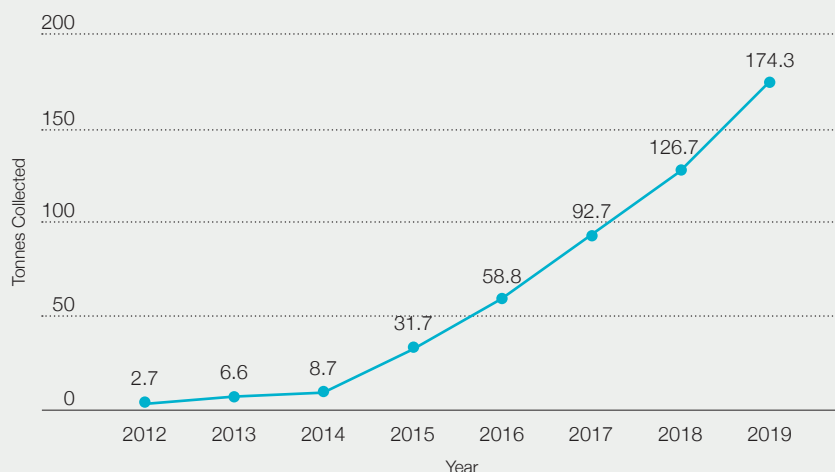
As part of our commitment to support Singapore's move towards a Zero Waste Nation, StarHub has previously set a target to increase the volume of e-waste collected annually to 125 tonnes by 2022 through our RENEW programme. We are pleased to report that we have met our target three years ahead of the deadline and will continue building on this momentum. Under the new Resource Sustainability Act, the government has legislated for a regulated e-waste management system based on the Extended Producer Responsibility (EPR) approach, administered by the National Environment Agency (NEA). Under this approach, producers will bear the responsibility for the

collection and treatment of used products from customers in the form of one-for-one take-back or in-store collection from July 2021 onwards. As such, StarHub will not be expanding the network of e-waste bins. Instead, we will be working with NEA to support the transition to the upcoming implementation of the EPR and explore ways to integrate our RENEW programme into the new approach by 2021.



A pledge to the environment, RENEW e-waste recycling bins deployed at all our major retail stores.

RENEW - amounts of e-waste recycled



The top five items recycled through RENEW in 2019 are:

Cables	22 tonnes
Laptops	13 tonnes
Modems/Routers	11 tonnes
Mobile phones	3 tonnes
CPU Computers	2 tonnes

² Source: towardszerowaste.sg as of 23 December 2019.

Addressing Climate Change and Resource Management

103-1, 103-2, 103-3, 302-1, 302-2, 302-3, 302-4, 305-1, 305-2, 305-3, 305-4

TARGETS:

Continue to ensure climate resilience through annual review of flood prone areas for all our network operations and facilities in 2020.

Increasing our renewable energy use from 2% of our total energy consumption in 2019 to 4% in 2020.

The Intergovernmental Panel on Climate Change report released in 2018 highlighted the need to limit the increase in global temperatures to 1.5°C above pre-industrial levels, to avoid the serious consequences of climate change. To achieve this target, man-made GHG, which are the main contributors to climate change, need to be drastically reduced. Singapore has pledged to peak its absolute GHG emissions by 2030, halve its 2030 peak emissions by 2050, and achieve net zero emissions as soon as viable in the second half of the century. A carbon tax was introduced in 2019 on large direct emitters, which indirectly led to an increase in our energy costs.

Energy and GHG Emissions

To ensure the resilience of our business due to the impact of climate change, including regulatory changes, it is imperative that innovative and adequate measures are put in place to increase our energy efficiency and reduce our GHG emissions.

Our technical centres, including our data centres and base stations, form part of our key infrastructure and are the basis of our products and services. They also contribute to the majority of our energy consumption. As the increasing demand for data by our customers leads to higher energy consumption, we are focusing on operating our technical centres in an energy-efficient manner and adopting energy-efficient technologies. This includes increasing



Artist's impression of StarHub's Hyperscale Data Centre @ Loyang.

our use of renewable energy. In 2019, with the purchase of 2,850 megawatt-hours of RECs, we raised our use of renewable energy to 2%, thereby reducing our carbon emissions³. We aim to increase the proportion of our energy consumption from renewable sources to 10% by 2022.

In 2019, we completed the implementation of our Smart BTS (Base Station) Energy initiative. It automatically switches off part of the radio resources at our base stations during low traffic periods without affecting mobile services. This system improves the energy efficiency of the base stations by 2% to 4%.

We have been monitoring our environmental performance to manage our resources and allow better decision-making. While total energy consumption has increased slightly by 1.6%, which was driven by increased customers' usage of our network of base stations and technical centres, our direct fuel consumption for our backup generators and transport fleet has declined substantially to 5,740 gigajoules, marking a reduction of 23% from 7,470 gigajoules in 2018, and 42% from 9,876 gigajoules in 2015.

Climate Change Adaptation

In 2020, we will be launching our new StarHub Data Centre @ Loyang – a state-of-the-art hyperscale facility which is built in line with the industry's highest certified standards. It is designed with low power usage effectiveness ratio and uses indirect evaporative cooling, which will require less energy compared to our existing data centres.

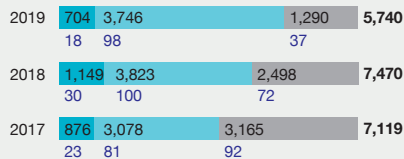
As a low-lying island state, Singapore is vulnerable to the effects of climate change, including rising sea levels and floods from intense storms, which in turn, can impact our operational continuity. In 2019, we established our Climate Risk Framework by including annual review of our facilities against the list of flood prone areas, into our Facility Management Policy. Through the identification of flood-risk, appropriate control measures will be implemented to effectively mitigate our physical climate risk. In March 2019, an independent infrastructure audit was conducted and found no significant issues with the resilience of our network, operations and facilities. StarHub is also ISO 22301:2012 certified, which fulfils requirements for controls of Business Continuity Management, including measures to improve climate change adaptation.

³ Based on the GHG Protocol market-based reporting method.

SUSTAINABILITY REPORT

Fuel Consumption

gigajoules | thousand litres



● Diesel - Stationary Combustion
● Diesel - Mobile Combustion
● Petrol - Mobile Combustion

Electricity Use⁽¹⁾

gigajoules | million kilowatt-hour



● StarHub ● Additional Technical Centres

Energy Consumption

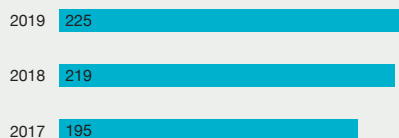
gigajoules



● StarHub ● Additional Technical Centres

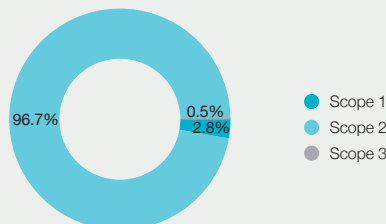
Energy Intensity^{(2) (6)}

gigajoules per \$million revenue



Emission Sources

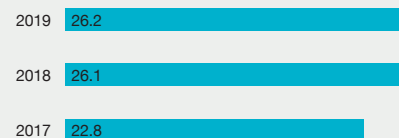
tonnes CO₂e



● Scope 1
● Scope 2
● Scope 3

Emissions Intensity^{(5) (6)}

tonnes CO₂e per \$million revenue



GHG EMISSION SOURCES

Scope 1

2019⁽³⁾

2018

2017

Stationary combustion

49

81

61

Mobile combustion

349

436

426

Fugitive emissions (refrigerant gases)

1,290

1,721

–

Total Scope 1 Emissions (tonnes CO₂e)

1,688

2,238

487

Scope 2

Purchased Electricity

59,062⁽⁴⁾

59,188

54,145

Total Scope 2 Emissions (tonnes CO₂e)

59,062⁽⁴⁾

59,188

54,145

Scope 3

Electricity consumption by Exclusive Partners

201

179

190

Employee business travel (air)

112

111

–

Total Scope 3 Emissions (tonnes CO₂e)

313

290

190

Total Emissions (tonnes CO₂e)⁽⁵⁾

61,063

61,716

54,822

(1) Purchased electricity data reported cover approximately 95% of our base stations. As we were not billed directly for the electricity consumption at some of our base stations, a portion of our consumption cannot be accounted for.

(2) Energy intensity includes fuel consumption, electricity purchased and electricity consumption by our Exclusive Partners.

(3) The CO₂ equivalent emissions for fossil fuel sources are calculated based on the United Kingdom Greenhouse Gas Inventory that is compiled according to the Intergovernmental Panel on Climate Change (2006) Guidelines. The CO₂ equivalent emissions for purchased electricity is calculated based on the 2018 emissions factor published in the Singapore Energy Statistics 2019 by the Energy Market Authority.

(4) Based on the GHG Protocol market-based reporting method. The scope 2 emissions derived using location-based method amount to 60,256 tonnes CO₂e.

(5) GHG emissions intensity include scope 1, scope 2 and scope 3 emissions.

(6) The revenue information is based on Singapore dollars rounded to the nearest million.

– indicates data not available

Water Use
303-3



TARGET:
Detect and manage leaks promptly to minimise water wastage in 2020.

Besides energy, we also use water in our offices, shops and data centres, which is drawn from municipal sources. Through our Employee Code of Conduct and Ethics, 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 through internal reporting to detect leaks and prevent wastage. Any significant increase in water consumption will trigger an inspection to determine the cause. Our utility bills indicate that our water use across the Group, excluding our shops and certain data centres for which we were not billed based on consumption, totalled 21,783 cubic metres in 2019. This marks a reduction of more than 10% year-on-year since 2018.

Waste Management
306-2

StarHub handles and disposes of electronic equipment and devices daily as part of our services. In 2019, we generated 387 tonnes of e-waste from our operations. Guided by our Housekeeping Safe Work Procedure, we collect our e-waste and ensure it is recycled by licensed e-waste contractors.

StarHub also aims to reduce the use of materials and the generation of other non-hazardous waste. To cut down our use of paper, we have limited the number

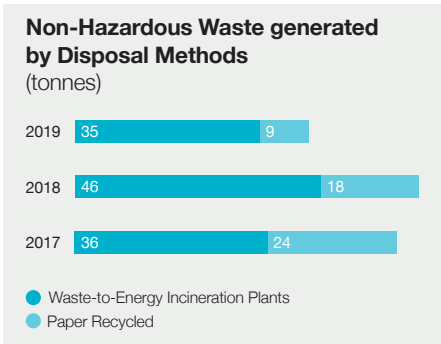
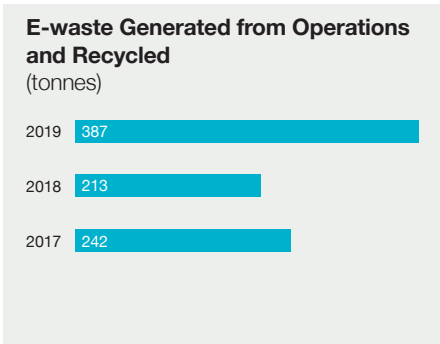
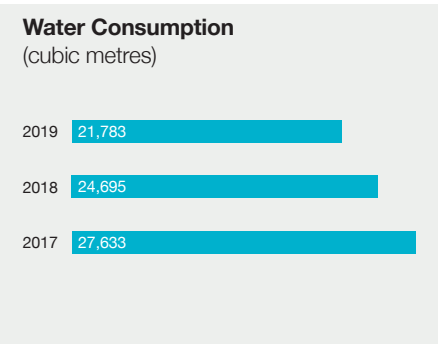


Encouraging environmentally friendly habits through the 'Skip the Bag' initiative at our retail stores.

of printed copies of our annual reports and Extraordinary General Meeting circulars. In an effort to go green and align with Singapore's Smart Nation vision of digital transformation, customers who sign up for a new service or renew their contracts will receive electronic bills by default. A monthly fee of \$1 per billing account will apply if the customer opts in to receive paper bills, with the exception of customers aged 60 and over. 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 bag and 'Go Green with StarHub'. E-posters are put up in our shops and tent cards are placed around our retail counters to raise awareness of the initiative.



SUSTAINABILITY REPORT

Promoting Environmental Awareness

103-1, 103-2, 103-3

Protecting the environment requires contributions from businesses, the government and the public. At StarHub, we undertake multiple initiatives within the community to raise awareness on environmental issues.

Our community initiatives in 2019 include:



Students' environmental outreach projects on display at the SEC-StarHub School Green Awards.

SEC-StarHub School Green Awards

StarHub is a partner of the SEC and has supported the SEC-StarHub School Green Awards for the past six years. The programme is designed to help advance the climate change agenda by instilling the right values in our future generation, and to raise public awareness of climate issues through various environmental outreach projects.

Between 2015 and 2019, schools in Singapore collectively achieved tremendous results in terms of resource savings, including electricity, water and paper. Collectively, they reduced GHG emissions by 380,000 tonnes CO₂e. In 2019, there was significant participation in the SGA, with nearly 400,000 students and teachers involved and also reaching out to about 500,000 members of the public. This brings the total outreach number to almost one million – 16% of Singapore's total population.

The SEC-StarHub E-waste Challenge was introduced in 2018 as part of the SGA to raise awareness of e-waste recycling. In 2019, a record number of 61 schools took part in the challenge and collected 3,411 kilogrammes of e-waste, far exceeding the 1,161 kilogrammes of e-waste collected in 2018. The e-waste recycling drive collected a total of almost 40 tonnes of e-waste from 445 schools since the start of the programme.



Urban farming workshop with children from the Nurture Programme at the Edible Garden City.

Fostering Urban Farming

As part of our staff and community engagement programme, an urban farming workshop was organised at Edible Garden City, an organisation which champions the grow-your-own-food movement. The workshop was attended by 53 StarHub employees including our Chief Executive, together with 100 children from lower-income families from the Nurture Programme at the Central Singapore Community Development Council. The aim of the outdoor learning experience was to equip children with basic gardening skills and an understanding of the adverse impact of large-scale commercial farming. We wanted to provide insights on how urban farming plays a large part in reducing energy use and carbon emissions, while boosting the resilience of Singapore's food supply.



INVESTING IN OUR PEOPLE

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 demands for greater flexibility, real-time learning and purpose in the workplace. Attracting and retaining the best talent, supporting their professional growth and looking after their health, safety and well-being are all priorities for StarHub.



Cross-functional staff hackathons for business and corporate culture innovations.



StarHubbers hard at work to define and explore new ways of working.

SUSTAINABILITY REPORT

Talent Management

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

TARGETS:

100% of identified high-potential talent to have development plans in place in 2020.

Learning and development activities to reach at least 70% of our employees in 2020.

Our industry is undergoing rapid transformation, which requires us to constantly assess the critical skills that are needed for our business to succeed. 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 use alternative recruitment channels, such as hackathons, to tap into a larger talent pool, especially for tech-based roles. We offer 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, including birthday leave, examination leave, eldercare leave and volunteerism leave. We also offer comprehensive health screening packages, and additional insurance for medical, dental, life and accident cover.

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 2019, 103 of our employees took parental leave with 97% returning to work afterwards.

We also had a retention rate of 99% for those employees that returned to work after taking parental leave in 2018.

StarHub is also committed to the development of all talents within the organisation. For employees who have been identified as high-potential talents, individual development plans will be co-designed with the employee to plan developmental assignments for their career progression and growth. For all other employees, we will continue to curate and ensure they have access to programmes for their professional development, in the domains of technical skills and personal effectiveness.

We continue to invest in our leaders by building management and leadership skills, through our People Leadership programmes, enabling them to engage and motivate teams to perform effectively. In 2019, we introduced an annual Talent and Succession Planning framework and process. This involves a talent and succession review at divisional and Senior Leadership Team levels to identify future leaders of StarHub. Once these individuals have been identified, we create action-oriented plans for accelerated and targeted development. In 2020, the focus will be on leadership development and include psychometric assessments, mentoring, stretched assignments including completion of business missions, as well as planned rotation or job swaps.

Building our employees' skills and capabilities through continuous learning and development programmes is essential for employee retention, and also 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, the IMDA and the Economic Development Board.

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 \$848,702.60 in training in 2019 and received \$114,784.93 in training subsidies from various government agencies. These include the IMDA Company-Led Training funding. In total, we provided 29,522 hours of training for our employees. Through our learning and development programmes, we reached out to 71.3% of our workforce.

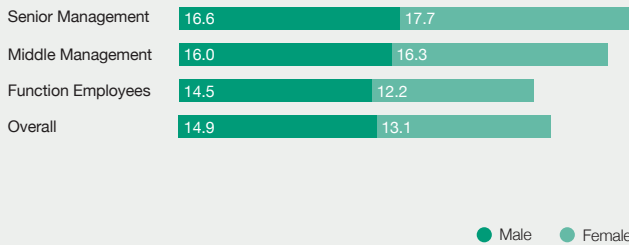
Our employees receive regular performance and career development reviews as part of StarHub's performance management system. Personal targets are set by supervisors and employees under five categories: Financial, Business, Customer, Process and People. Behavioural goals are also set according to StarHub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

We have signed a Memorandum of Understanding (MOU) in 2016 with the Singapore Industrial and Services Employees' Union (SISEU), in which employees can take part in recreational and social activities organised by the union. We maintain a collaborative partnership and have open and timely dialogues with SISEU while continuing to work diligently to ensure our employees' skills stay relevant as we undergo our business transformation.

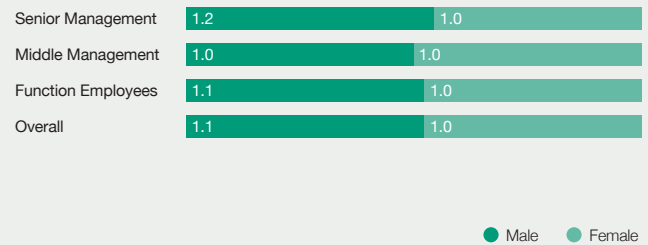
Workforce Snapshot 2019

102-8, 401-1, 404-1, 405-1, 405-2

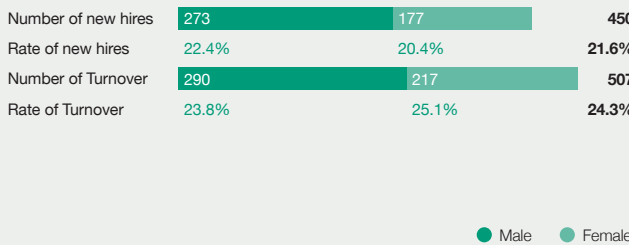
Average Training Hours per Employee Category and Gender



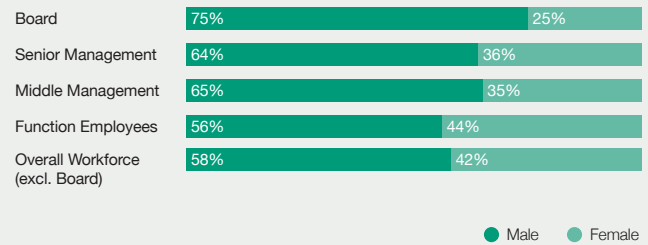
Ratio of Base Salary



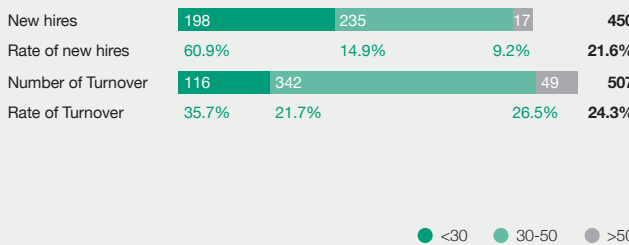
New Employee Hires and Turnover by Gender^{(1) (2)}



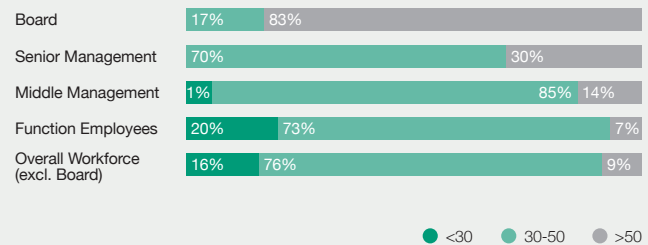
Gender Diversity by Employee Category⁽¹⁾



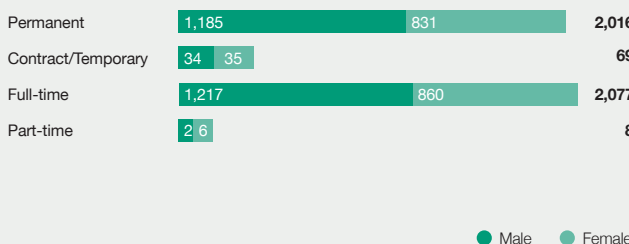
New Employee Hires and Turnover by Age Group^{(1) (2)}



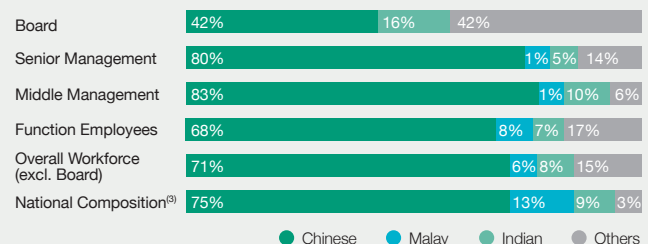
Age Diversity by Employee Category⁽¹⁾



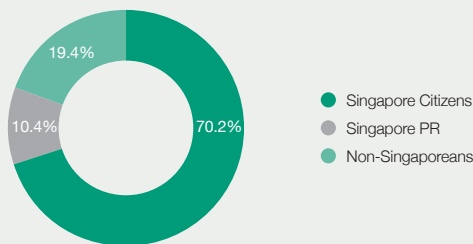
Number of Employees by Employment Contract, by Gender⁽¹⁾



Ethnic Diversity by Employee Category⁽¹⁾



Proportion of Local Employees



- (1) Numbers and rates are reported based on year-end headcount as recommended in GRI 102-8.
- (2) Turnover includes both voluntary and involuntary turnover and refers to the employees who left the company during the reporting period.
- (3) Ethnic Composition of the Resident Population 2019 End June published by the Department of Statistics Singapore.

SUSTAINABILITY REPORT

**Workplace Equality,
Diversity and Inclusion**
102-8, 103-1, 103-2, 103-3, 405-1,
405-2, 406-1

TARGET:

Maintain zero reported incidents of discrimination in 2020.

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

Management regularly reviews HR policies and practices relating to hiring, diversity and inclusion, equal opportunity, training and 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, 42% of our workforce and 25% of our Board members are female.

As a signatory to the Tripartite Alliance for Fair Employment Practices (Tafep) — a national initiative in Singapore to promote the adoption of fair employment practices — StarHub prohibits any kind of discrimination in employment or transactions. In 2019, no incidents of discrimination were reported directly to StarHub or through Tafep.



StarHubbers dressed to their best at our Dinner and Dance 2019.

Employee Health and Safety

103,1, 103-2, 103-3, 403-9

TARGET: Maintain zero work-related fatalities in 2020.

The health and safety of our employees is a key priority for StarHub. It is both a business imperative and our responsibility as an organisation to ensure all employees, contractors and suppliers are safe in the workplace. As such, we seek to create an environment that promotes the health, safety and well-being of our employees.

We continue to demonstrate our commitment to Workplace Safety and Health (WSH) by engaging employees to review WSH procedures and practices, taking preventative measures and increasing employee awareness of such risks. For employees with roles that require WSH domain knowledge, StarHub provides company-sponsored training support

to improve their skills and capabilities to deal with WSH-related issues on the job. Examples of training support include first-aid, work-at-height and incident management processes to respond to emergencies.

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 the MOM. As an organisation, we report workplace health and safety-related incidents to MOM. StarHub continues to be a certified bizSafe Level 3 organisation, which is awarded by the Workplace Safety and Health Council Singapore (WSH Council) based on an independent audit.

We adopt the WSH Council's calculation methodology for our health and safety indicators. In 2019, there were no incidence of work-related fatalities. However, there

were an increase in the Accident Frequency Rate, Accident Severity Rate and Workplace Injury Rate. This is due to traffic accidents involving our transport fleet vehicles. We have investigated the nature of these accidents and concluded that the accidents were caused by third parties. Going forward, we will continue to promote safe driving practices and ask our employees to be extra vigilant on the road.

The workers who are not employees are not included in the reporting of our safety performance because the safety reporting will be done by their direct employers. Although the safety statistics of our contractors are not tracked, StarHub is responsible and accountable for ensuring a safe and healthy working environment. Under the local incident reporting regulations, it is StarHub's duty to report any dangerous occurrence that has happened at our workplace.

WORKPLACE SAFETY AND HEALTH PERFORMANCE

Key Indicators	2019	2018	2017
Workplace Fatalities			
Number of Workplace Fatalities	0	0	0
Accident Frequency Rate (AFR)⁽¹⁾			
Number of Workplace Accidents	3	1	0
AFR	0.7	0.2	0
Accident Severity Rate (ASR)⁽¹⁾			
Number of Man-days Lost	52	1	0
ASR	13	0.1	0
Workplace Injury Rate (WIR)⁽¹⁾			
Number of Workplace Injuries	3	1	0
WIR	144	45	0
Occupational Disease			
Number of Occupational Disease Cases	0	0	0

⁽¹⁾ Accident Frequency Rate is given as the number of MOM reportable incidents per million working hours. Accident Severity Rate is given as the number of man-days lost per million working hours. Workplace Injury Rate is given as the number of MOM reportable incidents per 100,000 employed persons. The number of employed persons is based on the year-end headcount and the number of hours worked is estimated based on the year-end headcount with a standard 42.5 hours work week, taking into account the 16.61 days of paid annual leave, 4.22 days of paid sick leave and 11 days of public holidays per employee in 2019.

SUSTAINABILITY REPORT

INVESTING IN OUR COMMUNITY

103-1, 103-2, 103-3

We are committed to being a valued partner of the communities in which we operate. StarHub recognises that the use of our products and services affects people's lives. In many cases, the impact is positive, with individuals having increased access to information and services. On the other hand, new technology requires new skills, which can be challenging for disadvantaged groups to develop, such as those with disabilities or at-risk youths. Such skills are now essential for everyday life, especially in terms of employability. We are committed to supporting disadvantaged groups in the areas of digital inclusion and employability through community investment.



StarHub supports people with disabilities at the SPD Charity Show 2019.

TARGET:

Enhancing our CSR with a focus on climate change, through employee engagement and working with our beneficiaries.

We work with several organisations that equip underprivileged youths, families and people with disabilities with digital, employability and essential life skills. Our support comes in the form of funds, access to information and communication technology, as well as voluntary employee time.

In 2019, StarHub contributed a total of \$1,032,305 to 15 VWOs and non-profit organisations. As a firm believer of using our assets to do good for society, our donations

included airtime sponsorships totalling \$400,000 in 2019, of which \$300,000 went towards supporting the World Wildlife Fund for Nature's Earth Hour 2019, and \$100,000 was provided to Singapore's 2019 National Day celebrations.

In addition, all employees are entitled to two days of volunteer leave. We are pleased to report that our employees collectively contributed 616 hours of their time in 2019, almost twice as much compared to the previous year, with 6.9% of our workforce using their volunteering leave allowance. The range of CSR activities held in 2019 included ComChest Heartstring Walk with seniors from the Loving Heart Multi-Service Centre, Edible Garden workshop with children from the Nurture Programme, and *longkang* fishing with the students from

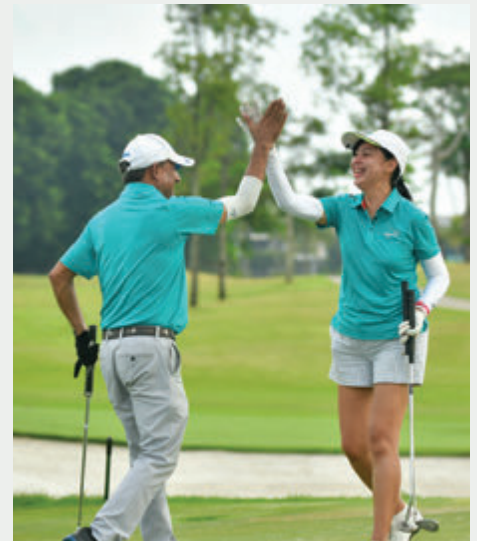
Metta School. We aim to increase employee participation in community activities and will ramp up our initiatives to make a greater impact together as a Group.



StarHubbers and Metta School students experience the fun of *longkang* fishing.



StarHubbers march-on at the Community Chest Heartstrings Walk 2019.



Gender parity on the golf course.



StarHubbers and business partners tee off at the StarHub Open charity golf event, in support of Community Chest beneficiaries.

Community Chest, The StarHub Open and Heartstrings Walk

The StarHub Open, our annual charity golf event, raised \$180,000 in 2019 in partnership with 240 of our corporate clients to support social and digital inclusion causes. Through our partner, Community Chest, we donated these funds to three VWOs, namely Metta School, Shine Children & Youth Services, and Singapore Anglican Community Services, which help people with intellectual or developmental disabilities and mental health issues live independently. Beneficiaries receive life and vocational skills training which prepares them for employment opportunities and helps them integrate into the community. To further support Metta School and make the event more meaningful, the winning golfers received championship trophies specially designed and produced by the Metta Alumni.

In relation to the donation, StarHub was recognised for its support as a Gold Partner and was invited to take part in the Community Chest Heartstrings Walk. A total of 50 seniors from the Loving Heart Multi-Service Centre, including some with mobility difficulties, successfully completed the 4-kilometre trail around Marina Bay promenade, with the support of 70 StarHub employees and our Chief Executive.



Top golfers and participants bring home ceramic trophies designed and produced by Metta Alumni.

SUSTAINABILITY REPORT

The Care Corner Youth Services

Since 2017, StarHub has partnered with Care Corner Youth Services, which reaches out to at-risk youths, between nine and 21 years old, who lack meaningful engagement at home and in school. The aim is to create a safe and encouraging environment to help empower them. This year, therapeutic spaces were introduced to allow them to express themselves in a nurturing environment, with support from dedicated adult role models. We contributed \$50,000 to the programme in 2019, and during the course of 66 sessions, the programme reached out to 659 participants aged between nine and 14 years old.

A total of 25 StarHub employees kicked off the first CSR activity of 2019 by throwing a Chinese New Year celebration for the Care Corner youths at the Teck Ghee Youth Centre, who enjoyed entertainment programmes performed by our volunteers. StarHub also led a session and shared tips on responsible social media and smartphone usage. At the end of the event, the youths were presented with Chinese New Year goodies, mandarin oranges and vouchers.



Celebrating Chinese New Year at the Care Corner CROSSROAD Youth Centre.

At the end of the year, we engaged with the Youth Rangers from Care Corner to paint a mural at our headquarters in StarHub Green, which showcased their artistic flair. Our Customer Service Experience team organised the programme, including the design concept to the painting of the colourful artwork, lunch and logistics.



StarHubbers join forces with Care Corner Youth Rangers to complete wall mural at StarHub's office.



Showcasing the talents of Metta School students with customised Year-End Festive Gifts for our business partners.

Giving a Meaningful Gift

In support of Metta Welfare Association's efforts to empower Singaporeans with special needs, StarHub worked with Metta School to produce customised year-end festive gifts for our corporate customers. The gifts consisted of handmade cookies baked by apprentices at Metta School and a hand-painted glass bowl with a batik inspired design created by Metta School alumni.



Chief Executive Peter Kaliaropoulos and CFO Dennis Chia present \$100,000 cheque to Central Singapore CDC Mayor Denise Phua in support of Nurture Programme.

Central Singapore CDC's Nurture Programme

Since 2011, we have supported the Nurture programme, led by the Central Singapore CDC, contributing up to \$1.5 million to the initiative from our StarHub Sparks Fund. In 2019, we contributed \$100,000 towards the opening of six new Nurture centres, helping 427 underprivileged children. Through interactive and activity-based lessons, the programme aims to complement the efforts by the Ministry of Education 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 encourage values that inspire them to give back to the community. StarHub will continue this long-standing partnership with the Central Singapore CDC to empower and provide children with special needs or disadvantaged backgrounds with equal access to learning opportunities.

With our efforts and contribution, we were conferred the Community Partnership Excellence Award at the People's Association Community Spirit Awards 2019.



Success Story #1

Muhammad Walhasri Bin H. Hassan,
aged 10, from Nurture at Jalan Kayu

During the Problem Solving module, Wahalsri would often show little interest in the class activities as he was academically weaker in Mathematics. However, under the influence of his peers and encouragements from the volunteers, he started to adopt a growth mindset as the lessons progressed.

While he was aware that he was not good in Mathematics, he was no longer ashamed and believed he would be able to do it if he puts in effort. Through much perseverance, he had a taste of success when he was able to solve a problem. Following the experience, Walhasri began to actively participate in class discussions and even proactively approached volunteers for assistance when he faced challenges.



Success Story #2

Crystal Ng Chu Ting,
aged 11, from Nurture at Kreta Ayer

Crystal used to have a negative attitude towards life. However, the Nurture lessons, such as 'Examining Assumptions' and the weekly focus on 'Gratitude' made her realise the importance of being selfless. She now shows greater care and concern for her friends and has a more positive outlook.

Crystal continued to attend the Nurture lessons in 2019 and also said she would like to join the programme again next year.

SUSTAINABILITY REPORT



GOVERNANCE & MARKETPLACE

BEING A RESPONSIBLE BUSINESS

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 raise awareness and implement suitable measures to protect the safety of our online users, especially vulnerable groups such as children, and safeguard public health from the potential adverse effects of RF emissions.

Business Conduct and Ethics 102-16, 102-17, 103-1, 103-2, 103-3, 205-3, 206-1

TARGET:

Ensure strict compliance with local legal and regulatory requirements pertaining to fraud, corruption and unethical actions in 2020.

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

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 of Conduct and Ethics (Employee Code), which sets out the standards of behaviour and business conduct that employees are expected to follow when executing their tasks. Our Employee Code is supplemented by other policies which reinforce some of the business conduct and procedures that employees are expected to follow 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 when they first join and can also be readily accessed from our intranet.

Our Whistle Blowing Policy provides employees and external parties with accessible channels through which they may, in confidence and without the risk of reprisal, raise concerns in good faith on any possible improprieties in our business activities. Reporting channels 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 be subjected to appropriate disciplinary and legal actions, including dismissal. There were no incidents of corruption in 2019.

We also respect and comply with relevant legislation, licence obligations and codes of practice relating to anti-competitive behaviour for our business. There were no legal actions taken against StarHub for anti-competitive behaviour in 2019.

As a testament to our commitment to responsible corporate governance, StarHub maintained its position amongst the top 20 companies out of 578 Singapore-listed companies, which were ranked in SGTI⁴ in 2019. Our ISS⁵ score was 5 out of 10 in 2019 (where a smaller number indicates lower governance risk).

► For more details, please go to the Corporate Governance report on pages 62 to 86.

⁴ SGTI is the leading index for assessing corporate governance practices of Singapore-listed companies.

⁵ Institutional Shareholder Services Inc. is a global leading provider of corporate governance and responsible investment solutions for institutional investors through objective governance research.

Supply Chain Management

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

TARGET:
Implement the Supplier Self-Assessment Questionnaire to cover all our key suppliers with a spend of at least \$1 million per year in 2020.

We recognise that being a responsible business also requires us to integrate sustainability practices into our procurement and supply chain management processes. StarHub has an extensive and complex supply chain, spanning across widespread geographies and sectors. Due to the nature of our global supply chain, our business is exposed to additional risk areas which we need to manage in order to build resiliency, reduce the risk of disruption, enhance efficiencies and safeguard our reputation.

Our main suppliers include major handset and hardware manufacturers, as well as software and infrastructure solution providers. With a supply chain spend of close to \$1.8 billion in 2019, local suppliers made up about 93% of our total procurement spend⁶. Out of the 2,156 suppliers which we purchased from, 88% of our total supplier base were local.

In 2017, we began our supply chain risk assessment process. We completed a segmentation exercise, which allowed us to

identify high-risk suppliers using a weighted approach based on relevant factors for each supplier category. Through this exercise, we identified 47 high-risk suppliers, which StarHub will be conducting further due diligence on.

Last year, we updated our Supplier Code of Conduct (Supplier Code), outlining the standards of practice we require of our suppliers in the areas of human rights, labour, environment and anti-corruption. To embed the Supplier Code, we included it in the Terms and Conditions that we issue to our suppliers with each PO, as a first step. By accepting the PO, suppliers agree to adhere to the standards set out in the Supplier Code. With the formal governance structure established in 2019, we are in the process of implementing our Responsible Sourcing Policy, pursuant to which we reserve the right not to procure goods and services from suppliers who do not adhere to our Supplier Code.

Going forward, we will conduct further due diligence on the high-risk suppliers previously identified. In the first phase of our implementation, they will be required to report their compliance with the Supplier Code annually by completing StarHub's Supplier Self-Assessment Questionnaire online. The subsequent phase(s) will include a self-assessment of the remaining suppliers at least once every three years. Through this exercise, we aim to ensure that our suppliers are continuously aligned with our values and the requirements, as set out in the Supplier Code.

Online Safety

103-1, 103-2, 103-3

TARGET:
Continue to encourage and promote the appropriate and safe use of online technology in 2020.

The internet has fundamentally changed the way people live, work, learn and interact with one another. As technology continues to evolve and end-users engage online in new and different ways, new 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 post information on our website, community forums and social media platforms to educate our customers on safe online practices. Topics are identified through customer feedback, trending issues, internal stakeholders or other external parties. We also comply with requests from government agencies to block access to harmful websites.

We also offer JuniorProtect, an internet parental control service to protect children online. By subscribing, parents are able to, amongst other things, manage children's data usage and screen time, block unsafe content with easy pre-set filters and source reports and alerts on their web activities.

⁶ Supply chain procurement spend includes all procurement conducted during 2019, with or without 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, for example, through employment and taxes.

SUSTAINABILITY REPORT

Public Health and Safety

103-1, 103-2, 103-3

TARGET:

Maintain strict compliance with relevant RF radiation safety standards set by local regulators in 2020.

Despite the lack of conclusive evidence, there are concerns from customers, regulators and the general public on the perceived health risks associated with RF emissions from mobile devices and base stations. StarHub recognises the need to address such concerns.

We work closely with the relevant government agencies to stay up-to-date on the latest research and findings on RF emissions risks and aim to address customer feedback related to the various aspects of StarHub's operations which may impact public health.

We comply strictly with RF emissions and safety standards implemented by the regulators. RF emissions from StarHub's mobile equipment are also well within the guidelines developed by the International Commission on Non-Ionizing Radiation Protection and adopted by the World Health Organization. We work closely with the IMDA, the NEA and other mobile network operators in Singapore to carry out radiation measurements to verify that StarHub's equipment complies with Public Health and Safety standards in Singapore.

We seek to maintain strict compliance with relevant Public Health and Safety standards in Singapore, and no incidents of non-compliance were detected in 2019.

IMPROVING CUSTOMER EXPERIENCE

The success of our business depends on building strong, long-lasting relationships with our customers. Our Hello Change campaign was launched in 2018, highlighting our brand promise to put our customers first in everything we do. We are continuously enhancing our customer service to provide a seamless experience across all touchpoints. Our approach requires us to uphold the highest levels of cybersecurity and data privacy, responsible marketing and selling, as well as product and service quality.

Cybersecurity and Data Privacy

103-1, 103-2, 103-3, 418-1

TARGET:

Ensure strict compliance with local regulatory requirements pertaining to data privacy in 2020.

To maintain our customers' trust in our business, it is vital that we have in place adequate systems and processes to prevent cyber breaches and leaks, and respect customers' right to data privacy.

At the most basic level, 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 the IMDA. Audits are performed to verify our compliance on an ongoing basis.

We have implemented cybersecurity and internal data protection frameworks, which govern how StarHub employees should protect our systems against cyber threats and treat customer data. These internal policies guide compliance with regulatory requirements and best practices.

Our Security Team references the ISO 27001 standard to create and ensure a robust information security management system at StarHub. These include implementing relevant policies such as the Information Security Policy, the Vendor Security Policy and the Mobile Device Security Policy. Employees are required to comply with these policies, which are supplemented with procedures, guidelines and checklists to ensure the confidentiality, integrity and availability of our assets.

We recognise that the cybersecurity environment is constantly evolving, with new threats appearing almost daily. StarHub actively monitors ongoing trends in cybersecurity to ensure we stay updated on developments and are well-equipped to handle incidents and threats to our systems. StarHub's subsidiary, Ensign, one of Asia's largest cybersecurity companies, works on various cybersecurity initiatives for StarHub, including active surveillance and monitoring of cyber threats, the conduct of vulnerability assessments, penetration tests and undertaking incidence response.

We have a Data Protection Office to oversee StarHub's Data Protection Policy and ensure we comply with the PDPA. The Data Protection Office, together with the Legal and Regulatory departments, monitor upcoming legislative changes. Our Internal Audit function serves as the monitoring arm to provide assurance to Management on the effectiveness of our control measures.

We conduct an annual review of our employees' eligibility to access restricted areas (including data centres) based on their job responsibilities. We also set specific targets for security incidents, where compliance with these critical Key Risk Indicators is monitored by our Enterprise Risk Management team. In 2019, all incidents detected were mitigated. These incidents include Distributed Denial-of-Service attacks, failed logins, vulnerability scans, trojans and malware, as well as hacking tool activities.

We continue to ensure strict compliance and invest in cyber defence to safeguard customer data.

Responsible Marketing and Selling 103-1, 103-2, 103-3, 417-3

TARGET:

Maintain strict compliance of regulations and/or voluntary codes concerning marketing communications in 2020.

Marketing and advertising our products and services responsibly, and ensuring clarity in our pricing and billing, are critical to maintaining the loyalty of our customers.

We comply with all applicable local regulations and guidelines such as the Television and Radio Advertising and Sponsorship Code. Our Data Protection Office oversees the 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 be prefixed with the appropriate tag to ensure the clear intent of our communication. Our Customer Communication Guidelines supplement our DNC Policy and serve as further guidance to our materials related to customer communication.

In 2019, we accelerated our Hello Change strategy, which forms part of our commitment to do things differently by simplifying and improving services for all our customers. We introduced free caller number display and no hidden fees with our Hello Change Mobile plans. We also simplified our TV plans by introducing Entertainment Passes, providing better value and flexibility, and refreshed our StarHub Rewards programme to give customers rewards instantly.

When new products and services are launched, our customer service staff are trained to clearly communicate our pricing structure and contract terms to our customers. Customers may also access the My StarHub app or our website to manage their subscriptions and pay their bills.



There have been no incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications in 2019.

As an info-communications company, we are aware of our ability to promote social cohesion through our products and services and consider cause-related marketing an important element of responsible marketing.

In celebration of Singapore's Bicentennial and 54th birthday, we released a music video to pay homage to three of our nation's founding mothers. Titled #WeWillGetThere, the campaign spotlights the spirit of togetherness - regardless of race, language, religion, gender, class or ability.

SUSTAINABILITY REPORT



StarHub's pop-up 5G showcase at StarHub Green, powered by Singapore's first 5G Cellular-on-Wheels.

Product and Service Quality

103-1, 103-2, 103-3

TARGET:

Minimise instances of service disruptions in 2020.

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

One of our key areas of focus is ensuring continuous investment in infrastructure upgrades. This will ensure that we improve

the resilience of our network services, upgrade our networks to deliver faster speeds and become more efficient to enhance connectivity for the Internet of Things age and the next generation of mobile services (5G).

5G is expected to be a key connectivity infrastructure in Singapore, capable of supporting the transformation of many industry sectors. With its high-speed, low-latency and private networking capabilities, 5G will create massive opportunities for new applications and services that will impact our society and how everyone lives, works, learns and plays.

In October 2019, the IMDA launched a Call for Proposal (CFP) to facilitate the roll out of 5G mobile networks from 2020, with full-fledged 5G standalone capability, to cover at least half of the country by the end

of 2022. StarHub, in collaboration with M1, has submitted a proposal for a resilient and secure 5G network design to boost Singapore's Smart Nation initiatives.

To be a forerunner in 5G, StarHub is conducting research to discover the 5G solutions that will be viable 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 carry out trials and proof-of-concepts within the 5G ecosystem of technology. The objective of the cross-industry collaboration is to co-create innovative, highly relevant and sustainable 5G use cases across all six national strategic clusters: (i) Maritime Operations; (ii) Urban Mobility; (iii) Smart Estates, (iv) Industry 4.0; (v) Consumer applications; and (vi) Government applications.

In 2019, StarHub commenced 5G trials and the broadcast of ‘live’ 5G signals from our headquarters in StarHub Green. In addition, we launched Singapore’s first 5G Cellular-on-Wheels vehicle that can be deployed to handle spikes in mobile usage at major events and hosted a pop-up 5G showcase to enable the public to experience first-hand the benefits of 5G.

StarHub has set up a 5G Centre of Excellence team, with the following charter:

- Devise a new business model for Consumer (B2C), Enterprise (B2B) and Wholesale/Mobile Virtual Network Operator (MVNO) segments;
- Create the go-to-market programme, including partnerships such as an innovation lab with key front-running enterprise verticals to co-create differentiated business solutions and a technological test-bed to showcase thought-leadership through public-related events and think tanks; and
- Formulate the overall 5G investments strategy, viable long-term B2B and B2C business models. This will be set up in compliance with the IMDA 5G CFP requirements.

As a testament of our drive to provide customers with the highest level of product and service quality and reliability, StarHub achieved the fastest mobile data speeds according to the IMDA’s 1H2019 IMconnected report.

In other areas, we continuously develop our customer service to provide a seamless experience across all touchpoints. We take customer feedback very seriously as it is a key mechanism for us to understand consumer preferences. In turn, we aim to enhance our product and service offerings. We collect feedback from customers through surveys and across various touchpoints. We use the Net Promoter System index to gauge customers’ overall satisfaction with our products and services, as well as measure customers’ loyalty. We also follow up with those who have submitted unfavourable ratings for our products or services to swiftly address their

concerns. In 2019, 106 employees from StarHub’s Consumer & Channel Sales team were recognised for their exceptional service to customers at the Singapore Retailers Association’s Excellent Service Award, bringing home 22 Star, 48 Gold and 36 Silver awards.

In 2019, StarHub received two fines totalling \$58,000 from the IMDA due to disruption of StarHub’s services on two separate occasions – 10 February 2018 and 23 March 2018. Following the incidents, we strengthened our due diligence in our operating procedures to address the issue and prevent future recurrence. Our aim is to minimise instances of service disruptions in the future.

ENGAGING WITH OUR STAKEHOLDERS
102-21, 102-40, 102-42, 102-43, 102-44

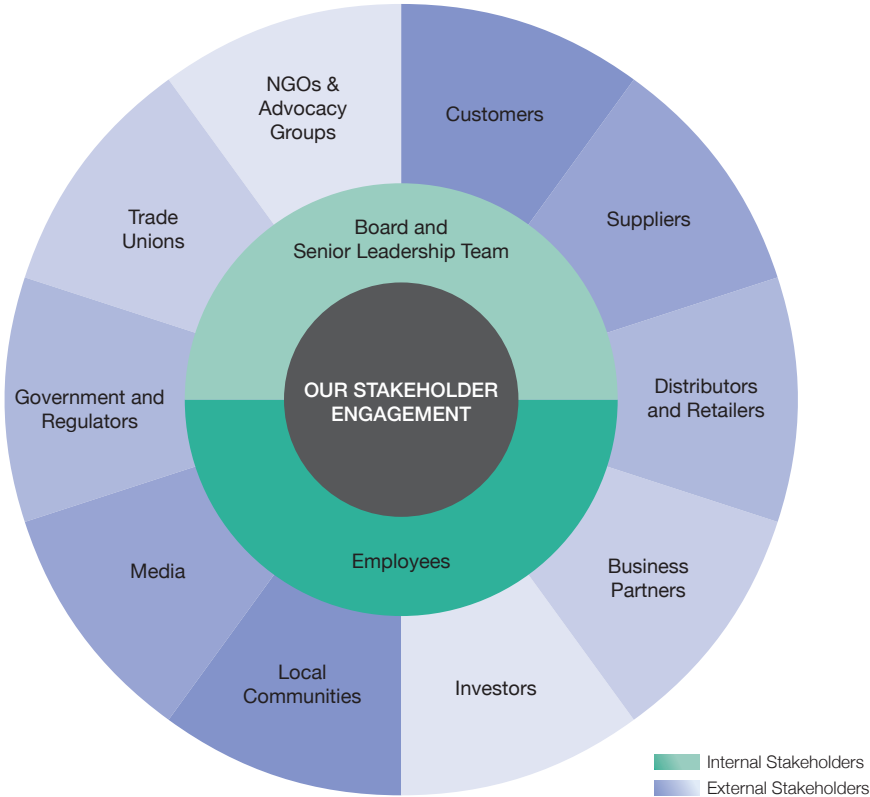
We strive to continue creating value for all our stakeholders. Our interactions and engagements with them are essential to our

long-term success and by promoting open dialogue, we create an environment in which our stakeholders can have their say and share ideas on how we can do things differently or work together to improve and instill best practices.

Through a stakeholder mapping exercise, 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.

We engage our stakeholders through a variety of channels, including one-on-one discussions, surveys, feedback forms, written communications, focus groups, roadshows and through social media platforms.

In 2019, our engagement efforts won us the first place in the Most Transparent Company Award for the Communications category and second place in the Shareholder Communication Excellence Award for the Big Cap category at the SIAS 20th Investors’ Choice Awards. The table on the next page illustrates our key engagement efforts during the reporting period.



SUSTAINABILITY REPORT

Summary of Stakeholder Engagement Efforts in 2019

Stakeholder Group	Engagement Method & Frequency	Stakeholders' Expectations	StarHub's Response
Customers	<ul style="list-style-type: none"> Customer surveys (ongoing) Social media (ongoing) GreenR Community Online Forum (regularly) Customer Service outlets (ongoing) Sustainability Report (annually) 	<ul style="list-style-type: none"> Seamless, high-quality coverage Simplicity and clarity of StarHub's fees and contracts Cybersecurity and data protection 	<ul style="list-style-type: none"> 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
Employees	<ul style="list-style-type: none"> Internal social media platforms such as StarHub Community and HubbaVoice (ongoing) Intranet (ongoing) Emails (regularly) Workshops (regularly) Employee communications session (bi-annually) Video address by Chief Executive (bi-annually) Employee engagement activities, such as fundraising (regularly) Sustainability Report (annually) 	<ul style="list-style-type: none"> Career and talent development Pay and benefits Work-life balance 	<ul style="list-style-type: none"> Introduced an annual Talent and Succession Planning framework and process Finalised plans to introduce a flexi-benefit scheme in 2020 to cater to employees' needs at different life stages
Suppliers	<ul style="list-style-type: none"> Company website (ongoing) Face-to-face meetings (regularly) Emails (regularly) Teleconference (regularly) Sustainability Report (annually) 	<ul style="list-style-type: none"> Procurement process Compliance with terms and conditions of purchasing policies, including StarHub's Supplier Code of Conduct 	<ul style="list-style-type: none"> Communicating our Supplier Code of Conduct online Establishing a Responsible Sourcing Policy Developing a supplier self-assessment questionnaire to guide compliance
Business partners	<ul style="list-style-type: none"> Face-to-face meetings (regularly) Teleconference (regularly) Sustainability Report (annually) 	<ul style="list-style-type: none"> Business opportunities partnerships 	<ul style="list-style-type: none"> Explored partnerships to seek mutually beneficial business opportunities
Media	<ul style="list-style-type: none"> Media events Media releases (regularly) Media responses (timely) Annual Report (annually) Sustainability Report (annually) 	<ul style="list-style-type: none"> Exposure and access to company developments and news as well as breaking stories on products, services, entertainment and related content 	<ul style="list-style-type: none"> Provided dedicated media contacts, and offering timely and accurate information on company affairs of public interest

Stakeholder Group	Engagement Method & Frequency	Stakeholders' Expectations	StarHub's Response
Investors	<ul style="list-style-type: none"> Briefing for earnings announcements (quarterly) 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 and phone number listed on IR website 	<ul style="list-style-type: none"> Transparency, timely information on business performance, strategy, views on operating landscape and business outlook Timely response to queries 	<ul style="list-style-type: none"> 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
Government and regulators	<ul style="list-style-type: none"> Face-to-face meetings (regularly) Consultation sessions (regularly) Calls for Proposals (regularly) Sustainability Report (annually) 	<ul style="list-style-type: none"> Compliance with regulations, including providing a resilient service for our customers 	<ul style="list-style-type: none"> Complied with regulatory requirements imposed by the regulators, including relevant audits on our infrastructure
Trade Unions	<ul style="list-style-type: none"> Face-to-face meetings (regularly) Informal/formal consultations (regularly) Sustainability Report (annually) 	<ul style="list-style-type: none"> Access to employees for promoting membership, open and honest dialogue with management 	<ul style="list-style-type: none"> Signed a MOU with SISEU
Local communities	<ul style="list-style-type: none"> Community outreach programmes Corporate sponsorships Sustainability Report (annually) 	<ul style="list-style-type: none"> Addressing social needs, including digital inclusion and employability 	<ul style="list-style-type: none"> Regularly reviewing community needs Partnering with VWOs Investing in community projects to support underprivileged youths and families
NGOs & Advocacy groups	<ul style="list-style-type: none"> Meetings (regularly) Conferences (regularly) Sustainability Report (annually) 	<ul style="list-style-type: none"> Responsible business practices Reducing environmental impact Disclosing information about our sustainability performance 	<ul style="list-style-type: none"> Developed plans to set science-based carbon reduction targets Supported the opening of GRI Regional Hub

SUSTAINABILITY REPORT

APPENDIX

StarHub Value Creation Scorecard

Performance Indicators	FY2019	FY2018	FY2017
Environmental			
GHG emissions (tonnes CO ₂ e)	61,063	61,716	54,822
GHG emissions intensity (tonnes CO ₂ e per \$million revenue)	26.2	26.1	22.8
Energy intensity (gigajoules per \$million revenue)	225	219	195
Water consumption (cubic metres)	21,783	24,695	27,633
General waste (non-hazardous) (tonnes)	35	46	–
Internal e-waste recycled (tonnes)	387	213	242
Paper recycled (kilogrammes)	8,910	17,797	24,230
Electricity used (million kilowatt-hours)	144.4	141.6	128.0
Social			
Employees			
Permanent employees	2,016	2,216	2,541
Local employees (Singapore citizens)	70%	73%	75%
New hires	450	358	332
Female employees	42%	41%	42%
Female managers (% of Senior level)	36%	37%	36%
Female managers (% of Middle level)	35%	36%	36%
Female Heads of Department (% of HODs)	37%	36%	30%
Average training hours per employee	14	19	17
Training expenditure per employee (\$)	421	618	994
Employee turnover rate ⁽¹⁾	24%	32%	20%
Number of reported work injuries	3	1	0
Fatal accidents	0	0	0
Community			
Employee volunteerism participation	7%	3%	7%
Community investment and donations to charities (\$million)	1.0	0.8	0.7
Governance & Marketplace			
Revenue (\$million)	2,331	2,362	2,401
Net profit (\$million)	179	201	250
Dividends paid to shareholders (\$million)	186	277	294
Suppliers			
Share of local suppliers as % of total supplier payments ⁽²⁾	93%	86%	93%
Proportion of local suppliers ⁽²⁾	88%	89%	84%

⁽¹⁾ Figures include voluntary and involuntary turnover, including all employees who left the company during the reporting period.

⁽²⁾ 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.

⁽³⁾ All financial information is reported based on Singapore dollars.

– indicates data not available

Membership and Associations in 2019

102-12, 102-13

As part of our stakeholder engagement efforts, we constantly look for opportunities to participate in relevant external initiatives and industry associations. In 2019, StarHub was actively involved with the following organisations:

Organisation

Advertising Standards Authority of Singapore
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 Financial Analyst
Chartered Secretaries Institute of Singapore
Chartered Institute of Management Accountants
CONEXUS Mobile Alliance
Consumers Association of Singapore
Contact Centre Association of Singapore
CPA Australia
International Council of Electronic Commerce Consultants
Global Compact Network Singapore
Global Reporting Initiative (GRI) Regional ASEAN Hub-Founding Consortium
GSMA
Information Systems Audit and Control Association
Institution of Engineering and Technology
Institute of Singapore Chartered Accountants
Promax Asia
Project Management Institute
Singapore Academy of Law
Singapore Advanced Research & Education Network
Singapore Business Federation
Singapore Chinese Chamber of Commerce & Industry
Singapore Computer Society
Singapore Corporate Counsel Association
Singapore Hotel Association
Singapore Institute of Directors
Singapore Institute of Management
Singapore International Chamber of Commerce
Singapore National Employers' Federation
Wireless Broadband Alliance
Intelligent Transportation Society Singapore
SGTech – Smart Nation Chapter

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 Senior Leadership Team 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 Senior Leadership Team and Board of Directors.

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.

SUSTAINABILITY REPORT

Description and Boundary of StarHub's material sustainability topics

103-1

Topic	Description	Suppliers	Infrastructure	Operations	Products	Customers
Environmental						
Climate Change Adaptation	Building our business and infrastructure resilience against the impact of climate change, including physical and regulatory risks.	X	X	X	X	
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	
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		
Social						
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 where we operate, particularly in supporting disadvantaged groups in the areas of digital inclusion and employability.			X		X
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		

Topic	Description	Suppliers	Infrastructure	Operations	Products	Customers
Governance & Marketplace						
Business Conduct and Ethics	Conducting our business activities responsibly, upholding the highest standards of ethics and integrity.	X		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
Product and Service Quality	Maintaining the highest level of product and service quality and reliability to establish trust and enhance customer experience.				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
Responsible Marketing and Selling	Marketing and advertising our products and services responsibly and ensuring clarity of our pricing and billing.			X		X
Supply Chain Management	Implementing responsible procurement practices and managing our supply chain impact through supplier engagement and collaboration.	X				

SUSTAINABILITY REPORT

Independent Limited Assurance Report

To the Directors of StarHub Ltd

Conclusion

We were engaged by the Board of Directors of StarHub Ltd (the Company) to provide limited assurance on the accompanying StarHub Sustainability Report 2019 for the year ended 31 December 2019 (the Report), as set on pages 94 to 131, and the selected Global Reporting Initiative Sustainability Reporting Standards disclosures (Selected GRI Disclosures) as identified below.

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 GRI 302-2	Energy consumption within the organisation and outside of the organisation	525,420 gigajoules (GJ)			
	GRI 302-3	Energy intensity	225 GJ per \$million revenue (including Exclusive Partners)			
Water	GRI 303-1	Water withdrawal by source	21,783 cubic metres			
Emissions	GRI 305-1	Direct (Scope 1) GHG emissions	1,688 tonnes CO ₂ e			
	GRI 305-2	Energy indirect (Scope 2) GHG emissions (location-based)	60,256 tonnes CO ₂ e			
	GRI 305-2	Energy indirect (Scope 2) GHG emissions (market-based)	59,062 tonnes CO ₂ e			
	GRI 305-3	Other indirect (Scope 3) GHG emissions	313 tonnes CO ₂ e			
	GRI 305-4	GHG emissions intensity	26.2 tonnes CO ₂ e per \$million revenue			
Effluents and Waste	GRI 306-2	Waste by type and disposal method	Internal e-waste recycled: 387 tonnes Paper recycled: 9 tonnes Non-hazardous general waste disposed: 35 tonnes			
Employment	GRI 401-1	New employee hires and employee turnover	Gender	Male	Female	Total
			Number of new hires	273	177	450
			Rate of new hires	22.4%	20.4%	21.6%
			Number of turnover	290	217	507
			Rate of turnover	23.8%	25.1%	24.3%
			Age Group	<30	30-50	>50
			Number of new hires	198	235	17
			Rate of new hires	60.9%	14.9%	9.2%
			Number of turnover	116	342	49
			Rate of turnover	35.7%	21.7%	26.5%
						24.3%

Material topic	GRI Standards topic-specific disclosure		Selected GRI Disclosures					
Training and education	GRI 404-1	Average hours of training per year per employee		Male	Female			
			Senior Management	16.6	17.7			
			Middle Management	16.0	16.3			
			Function Employees	14.5	12.2			
			Overall	14.9	13.1			
Workplace Equality, Diversity and Inclusion	GRI 405-1	Percentage of individuals within the organisation's governance bodies and overall employee profile in each of the following diversity categories: i. Gender ii. Age group iii. Other indicators of diversity (e.g. ethnic group)	Gender	Male	Female			
			Board	75%	25%			
			Senior Management	64%	36%			
			Middle Management	65%	35%			
			Function Employees	56%	44%			
			Overall Workforce (excl. Board)	58%	42%			
			Age Group	<30	30-50	>50		
			Board	0%	17%	83%		
			Senior Management	0%	70%	30%		
			Middle Management	1%	85%	14%		
			Function Employees	20%	73%	7%		
			Overall Workforce (excl. Board)	16%	76%	9%		
			Ethnic Group	Chinese	Malay	Indian	Others	
			Board	42%	0	16%	42%	
			Senior Management	80%	1%	5%	14%	
			Middle Management	83%	1%	10%	6%	
			Function Employees	68%	8%	7%	17%	
			Overall Workforce (excl. Board)	71%	6%	8%	15%	
	GRI 405-2	Ratio of the basic salary and remuneration of women to men for each employee category	Ratio of Base Salary	Female	Male			
			Senior Management	1.0	1.2			
			Middle Management	1.0	1.0			
			Function Employees	1.0	1.1			
			Overall Workforce (excl. Board)	1.0	1.1			

SUSTAINABILITY REPORT

Material topic	GRI Standards topic-specific disclosure	Selected GRI Disclosures
Workplace Health and Safety	GRI 403-9 Work-related injuries and fatalities	Work-related injuries and fatalities 2019
		Workplace Fatalities
		Number of Workplace Fatalities 0
		Accident Frequency Rate (AFR)
		Number of Workplace Accidents 3
		AFR 0.7
		Accident Severity Rate (ASR)
		Number of Man-days Lost 52
		ASR 13
		Workplace Injury Rate (WIR)
		Number of Workplace Injuries 3
		WIR 144
		Occupational Disease
		Number of Occupational Disease Cases 0
Procurement practices	GRI 204-1 Proportion of spending on local suppliers	Share of local suppliers as a percentage of total supplier payments: 93%
		Proportion of local suppliers as a percentage of total suppliers: 88%

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.

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.
- Visits to offices and data centres operating in Singapore selected on the basis of a risk analysis including the consideration of both quantitative and qualitative criteria.
- 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.
- Comparing 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.
- 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

6 March 2020

SUSTAINABILITY REPORT

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 the 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	16-17
	102-3 Location of headquarters	Singapore
	102-4 Location of operations	230
	102-5 Ownership and legal form	254-255
	102-6 Markets served	16-17, 199-201, 230
	102-7 Scale of the organisation	16-17, 42-47, 113
	102-8 Information on employees and other workers	113
	102-9 Supply chain	121
	102-10 Significant changes to the organisation and its supply chain	No significant changes
	102-11 Precautionary Principle or approach	88-91
	102-12 External initiatives	129
	102-13 Membership of associations	129
	Strategy	
	102-14 Statement from senior decision-maker	98
	102-15 Key impacts, risks, and opportunities	88-91, 100, 129
	Ethics and Integrity	
	102-16 Values, principles, standards, and norms of behaviour	120
	102-17 Mechanisms for advice and concerns about ethics	120
	Governance	
	102-18 Governance structure	62, 104
	102-19 Delegating authority	
	102-20 Executive-level responsibility for economic, environmental, and social topics	

GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
GENERAL DISCLOSURE		
GRI 102: General Disclosures 2016	Stakeholder Engagement	
	102-40 List of stakeholder groups engaged	125-127
	102-41 Collective bargaining agreements	32% of our workforce are general members of SISEU.
	102-42 Identifying and selecting stakeholders	125
	102-43 Approach to stakeholder engagement	125-127
	102-44 Key topics and concerns raised	126.127
	Reporting Practice	
	102-45 Entities included in the consolidated financial statements	199-201
	102-46 Defining report content and topic Boundaries	130-131
	102-47 List of material topics	100, 130-131
	102-48 Restatements of information	No information was restated
	102-49 Changes in reporting	No changes in reporting
	102-50 Reporting period	96
	102-51 Date of most recent report	StarHub Sustainability Report 2018, published March 2019
	102-52 Reporting cycle	96
	102-53 Contact point for questions regarding the report	96
	102-54 Claims of reporting in accordance with the GRI Standards	96
	102-55 GRI content index	136-140
	102-56 External assurance	96, 132-135
TOPIC SPECIFIC DISCLOSURES		
ENVIRONMENTAL		
Climate Change Adaptation		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	107
	103-3 Evaluation of the management approach	107
Energy and GHG Emissions		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	107-108
	103-3 Evaluation of the management approach	107-108
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	107-108
	302-2 Energy consumption outside of the organisation	107-108
	302-3 Energy intensity	107-108
	302-4 Reduction of energy consumption	107-108

SUSTAINABILITY REPORT

GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
GENERAL DISCLOSURE		
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	108
	305-2 Energy indirect (Scope 2) GHG emissions	108
	305-3 Other indirect (Scope 3) GHG emissions	108
	305-4 GHG emissions intensity	108
Water Use		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	109
	103-3 Evaluation of the management approach	109
GRI 303: Water and Effluents 2018	303-3 Water withdrawal	109
Waste Management		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	109
	103-3 Evaluation of the management approach	109
GRI 306: Effluents and Waste 2016	306-2 Waste by type and disposal method	109 Organisational defaults of the waste disposal contractor was used in the determination of the waste disposal method
SOCIAL		
Talent Management		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	112
	103-3 Evaluation of the management approach	112
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	113 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	112
	401-3 Parental leave	112
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	113

GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
GENERAL DISCLOSURE		
Workplace Equality, Diversity and Inclusion		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	114
	103-3 Evaluation of the management approach	114
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	113-114
	405-2 Ratio of basic salary and remuneration of women to men	113
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	114
Employee Health and Safety		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	115
	103-3 Evaluation of the management approach	115
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	115 Omission: Occupational Health and Safety data for contractors are not currently tracked by StarHub. We aim to begin tracking this data in the future
Investing in Local Communities		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	130
	103-2 The management approach and its components	116-119
	103-3 Evaluation of the management approach	116-119
GRI 413: Local communities 2016	413-1 Operations with local community engagement, impact assessments, and development programmes	116-119
GOVERNANCE AND MARKETPLACE		
Business Conduct and Ethics		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131
	103-2 The management approach and its components	120
	103-3 Evaluation of the management approach	120
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and actions taken	120
GRI 206: Anti-competitive Behaviour	206-1 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	120

SUSTAINABILITY REPORT

GRI STANDARD DISCLOSURE	GRI DISCLOSURE	REFERENCES/REASONS FOR OMISSION
GENERAL DISCLOSURE		
Supply Chain Management		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131
	103-2 The management approach and its components	121
	103-3 Evaluation of the management approach	121
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	121
Online Safety		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131
	103-2 The management approach and its components	121
	103-3 Evaluation of the management approach	121
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	121
Public Health and Safety		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131
	103-2 The management approach and its components	122
	103-3 Evaluation of the management approach	122
Cybersecurity and Data Privacy		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131
	103-2 The management approach and its components	122
	103-3 Evaluation of the management approach	122
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	122
Responsible Marketing and Selling		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131
	103-2 The management approach and its components	123
	103-3 Evaluation of the management approach	123
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labelling	123
Product and Service Quality		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	131
	103-2 The management approach and its components	124-125
	103-3 Evaluation of the management approach	124-125