## SASB Sustainability Report

VERSION 1.3, 19 MARCH 2025 ACTIVANTS PTE LTD, SINGAPORE



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## **SASB Sustainability Report 2024**

#### **Activants Pte Ltd**

**Application Development Company, Singapore** 

Reporting Period: January 1, 2024 - December 31, 2024

Prepared in accordance with SASB Standards (Software & IT Services industry)

### 1. Overview

Company Name: Activants Pte Ltd Industry: Software & IT Services

Employees: <100 full-time employees

**Operations**: Application development and local hosting of development environments

on physical server racks. **Headquarters:** Singapore

# 2. SASB Disclosures for the Software & IT Services Industry

## 2.1 Environmental Footprint of Hardware Infrastructure

TC-SI-130a.1

**Disclosure of Total Energy Consumed** 

**Disclosure of Percentage Grid Electricity** 

**Disclosure of Percentage Renewable Energy** 

Please refer to the table in Table 1.



## Table 1: Disclosure of Total Energy Consumed, Percentage Grid Energy & Percentage Renewable Energy for the Year 2024

Activants Utilities Usage for 2024																
Utility	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Average	% Grid Supplied	% Renewable
Electricity (in kWh)	2,389	2,968	2,813	3,073	2,994	1,086	1,196	1,099	1,144	1,010	1,016	3,365	24,153	2,013	100%	0%
Electricity (in GJ)	8.60	10.68	10.13	11.06	10.78	3.91	4.31	3.96	4.12	3.64	3.66	12.11	87.0	7.2	100%	0%

- Electrical energy supplied to Activants' Pte Ltd premises are 100% grid supplied.
- Between 1 Feb 2025 to 31 Jul 2025, a solar panel installer engaged by the building management will be carrying out installation work, and thereafter, a possible alternative source of electricity may be considered.
- Activants will take into consideration their operational needs and conduct risk assessments when considering the feasibility
  of using solar power to partially replace grid supplied electricity. Operational needs include:
  - Risks and impact of power interruption to on-premises server racks, which hosts the Development environments for all Activants' projects.
  - Risks and impact of power interruptions to on-premises facilities such as Wi-Fi routers, lighting, air-conditioning systems, that may disrupt the work of employees in the office during work hours.



#### TC-SI-130a.2.

#### **Disclosure of Total Water Withdrawn**

#### Disclosure of Total Water Consumed; Percentage of each in regions with high or Extremely High Baseline Water Stress

Please refer to the table in Table 2.

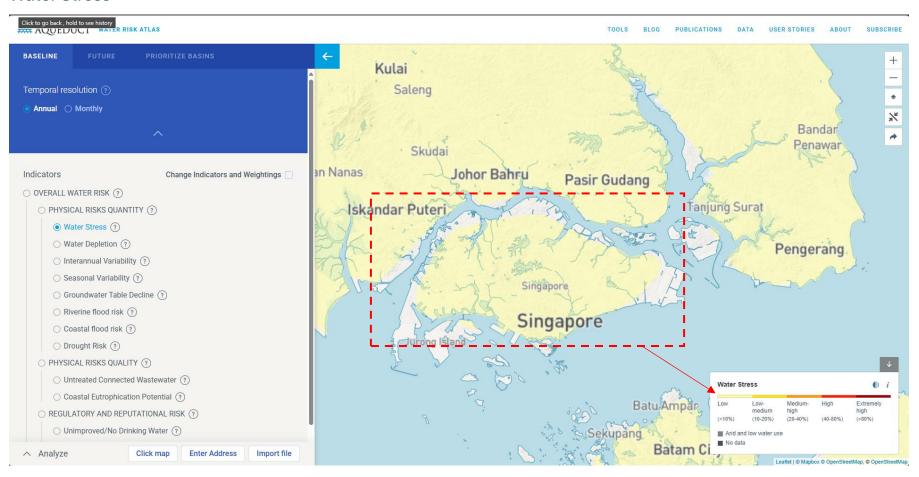
#### Table 2: Disclosure of Total Water Withdrawn, Total Water Consumed for the Year 2024.

	Activants Utilities Usage for 2024															
Utility	Utility Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec Total Average Supplied Sources															
Water (in thousand Cu M)	0.0056	0.00610	0.0087	0.0072	0.0037	0.0033	0.0052	0.0040	0.0025	0.003	0.0046	0.0061	0.0600	0.0050	100%	0%

- Water supplied to Activants' Pte Ltd premises are 100% utility supplied.
- Activants Pte Ltd's operations does not primarily use water as a component of their products and services.
- Consumption of water is limited to normal usage i.e., drinking, sanitary, washing, etc.



Figure 1: Analysis of Operations for Water Risks and Consumption of Water with High or Extremely High Baseline Water Stress





#### TC-SI-130a.3.

## Discussion of the integration of environmental considerations into strategic planning for data centre needs

At Activants Pte Ltd, our single server rack serves as a core element of our infrastructure, hosting software development environment for internal and external projects. While small in scale compared to traditional data centres, it is integral to our operations. We integrate environmental considerations into its management and strategic planning in the following ways:

#### 1. Energy Efficiency Measures

To minimize the environmental impact of our server operations, we prioritize energy efficiency:

#### Server Utilization Optimization

- Workloads are consolidated, and underutilized virtual machines are decommissioned, reducing idle power consumption.
- Server virtualization has been implemented to improve efficiency while maintaining performance.
- From 2025, we aim to install and implement an energy utilization tracking system specifically to track electricity usage for the server rack. This system may be installed only during the company's renovation works planned for Q3 to Q4 2025, to minimize operational disruption.
- o Server maintenance is performed monthly to optimize performance.

#### Cooling System Enhancements

- A single unit air conditioning system has been installed, paired with optimized airflow management in the server room to reduce coolingrelated electricity use.
- The temperature and humidity in the server room is monitored and logged daily as per ISO 27001:2013 requirements, which Activants Pte Ltd has been certified since August 2022.
- O In the upcoming office renovation planned for Q3 and Q4 2025, the air conditioning systems will be replaced, using R410/R32 refrigerant units instead of the current R22 refrigerant unit, with outdoor units of 5 ticks rating or higher according to Singapore's Mandatory Energy Labelling Scheme (MELS) and Minimum Energy Performance Standards (MEPS) (National Environmental Agency, 2025).

#### **Outcomes**



• Achieve a 5% reduction in electricity consumption in 2025 compared to 2024, bringing the overall energy usage to 22,945 kWh (approximately 82.6 GJ).

#### 2. Integration of Renewable Energy Options

Recognizing the carbon intensity of grid electricity, we are exploring cleaner energy alternatives:

#### • Feasibility Study for Solar Power:

- A study will be conducted in Q3/Q4 2025 to assess the feasibility of using solar power to offset server power consumption. The reason for the study to be conducted next year is due to the upcoming renovation works planned between Q3 to Q4 2025.
- The building management has also engaged contractors to install solar panels on the roof tops of the current office buildings. The availability and feasibility of using solar energy as an alternative for grid supplied electricity will be studied (See <u>Table 1</u>)
- Singapore does not have an abundance of space for building solar farms.
   The construction of the largest solar farm in Singapore is planned to begin in 2025 according this article in the Straits Times: Construction of S'pore's largest floating solar farm at Kranji Reservoir to begin in 2025 | The Straits Times

#### • Green Electricity Procurement

- Evaluating green energy plans offered by local retailers through the Open Electricity Market (OEM).
- By studying the electricity usage trends in 2024, we may consider subscribing to a green energy plan in the OEM with minimal risks, since disruption to the electricity supply has a very high impact on our daily operations.
- **Target**: Study the feasibility of transitioning 25% of the server rack's power to renewable sources by 2026.

#### 3. Waste Reduction and Lifecycle Management

To address the environment footprint of IT hardware:

#### • E-waste Management:

- Activants does not dispose any outdated server hardware, achieving 100% recycling in 2024.
- o This is also declared during our ISO27001:2013 certification audits.



#### 4. Risk Management in Strategic Planning

We proactively mitigate risks associated with environmental factors:

#### Overheating Risks

 Improved cooling infrastructure and regular temperature monitoring address rising ambient temperatures in Singapore.

#### Regulatory Compliance

 Adhering to the Energy Conservation Act (ECA) of Singapore and related sustainability regulations ensures compliance and operational integrity.

#### • Switching to Renewable/Green Energy Sources

- As alternatives to grid supplied electricity become available, especially in the vicinity of Activants' office where the server rack is located, feasibility studies are planned to assess if alternative sources of electricity such as solar power can be used, converting a portion of grid supplied electricity to solar powered electricity.
- Challenges to such feasibility studies include possible future expansion of the data centre, e.g. more than 1 server rack is needed due to business expansion or customer requirements, operational risks such as loss of power due to any technical failure, which may trigger a need for backup power sources, e.g. UPS, and other factors that may drive costs up or down.

#### Summary

**Metric**: Energy consumed as a percentage of revenue and by data centre location.

#### 2024 Performance:

o Total energy consumption: 24,153 kWh (87 GJ) (See <u>Table 1</u>)

#### **Actions Taken:**

- Optimized server rack energy efficiency by upgrading cooling systems.
- Scheduled regular server maintenance to minimize idle energy use.

#### Future:

- Conduct feasibility studies on transitioning to hybrid renewable energy sources.
- Target a 5% reduction in energy consumption by 2025.



### 2.2 Data Privacy and Freedom of Expression

#### TC-SI-220a.1.

- Activants does not perform any targeted advertising practices.
- Activants does not collect, use and retain any user information for all our developed software applications.

#### TC-SI-220a.2.

- Activants does not collect, use or retain any of the following users' information:
  - o Demographic data
  - o Behavioural data
  - o Location data
  - o Personal data

#### TC-SI-220a.3.

• Activants does not collect, use or retain any users' personal data, hence are no monetary losses incurred because of legal proceedings taken against Activants.

#### TC-SI-220a.4.

- Activants does not collect, use or retain any users' personal data or information.
- Activants has not been contacted by government or law enforcement agencies for user information.

#### **Summary**

**Metric**: Number of data breaches and percentage involving customers' personally identifiable information (PII).

- 2024 Performance:
  - o Total data breaches: 0
  - Percentage of breaches involving PII: 0%

#### **Actions Taken:**

- Conducted annual employee training on Singapore's Personal Data Protection Act (PDPA).
- Customer data are not stored/hosted in Activants' servers.



#### Future:

- Perform semi-annual internal audits of data protection policies.
- Develop a real-time monitoring system for data security.



### 2.3 Data Security

#### TC-SI-230a.1.

#### 1. Total number of data breaches identified during the reporting period

- In the calendar year of January to December 2024, Activants has not been victimized in any data breaches, though there were several attempts made at phishing, which could possibly lead to data breaches.
- A summary of such breach attempts is tabulated below, in chronological order:

Date of Data Breach Attempt	Attempted Breach Method	Remarks	Action Taken		
8 <sup>th</sup> October 2024	Email with Phishing Document attached	Breach attempt detected by management. Refer to sample in <u>Appendix C</u> .	Immediate notification sent to all staff and management, flagged as high importance.		
25 <sup>th</sup> June 2024	Email with Phishing Document attached with enticing email title.	Breach attempt detected by management. Refer to sample in <u>Appendix C</u>	Immediate notification sent to all staff and management, flagged as high importance.		
8 <sup>th</sup> March 2024	Email with sending pretending to be CEO of the company, requesting receiver to reply in email as soon as the sender's email is received.	Breach attempt detected by management. Refer to sample in <u>Appendix C</u>	Immediate notification sent to all staff and management, flagged as high importance.		
27 <sup>th</sup> February 2024	Email pretending so be a survey with promise of "gift card" as reward if receiver clicks on link in email received.	Breach attempt detected by management. Refer to sample in <u>Appendix C</u>	Immediate notification sent to all staff and management, flagged as high importance.		

#### 2. Percentage of Data Breaches that were Personal Data Breaches

 As disclosed above, there were no successful data breaches targeted at Activants Pte Ltd, hence there were no Personal Data Breaches that were successful.

#### 3. Total number of Unique Users affected by Personal Data Breaches

 As disclosed above, there were no successful data breaches targeted at Activants Pte Ltd, hence there were unique users affected by Personal Data Breaches.



#### TC-SI-230a.2.

- 1. Activants uses the following data security features:
  - a. Active Directory used to manage and organize network resources such as company users, laptop computers, and security policies.
  - b. Active Directory login password complexity aligned with ISO 27001:2013 requirements.
  - c. Mandatory login password changes at an interval set by the IT administrator, in accordance with ISO 27001:2013 requirements.
  - d. Firewall configured to only allow incoming IP addresses from selected countries besides Singapore.
  - e. Intrusion detection set at high sensitivity, blocking known malicious IPs, dark web, etc. Filtering mode is set to "notify and block".
  - f. Employees of Activants working remotely and accessing company servers use a VPN to access the company's NAS resources such as project files and other documents. List of VPN users and internal static IP addresses have been set up and reviewed at an interval aligned with ISO 27001:2013 requirements.
  - g. File transfer to external parties (customers, suppliers, vendors, etc.) are zipped, password protected, and passwords are sent in separate emails.
- 2. Activants adopts the ISO 27001:2013 Risk Assessment process to identify data security risks and vulnerabilities across the organization in operational procedures, management processes, structure of products, selection of business partners and use of technology.
  - a. Risks are identified by corresponding heads of business units, consolidated into a list.
  - b. Risk assessment is conducted and identified risks are rated.
  - c. The company assesses the impact of each risk, and the management agrees on the minimum risk rating that warrants mitigation to be exercised.
  - d. Risks are addressed according to planned mitigation, addressed, and reassessed annually according to ISO27001:2013 requirements.
  - e. Risk ratings can be lowered according to justifiable circumstances, reviewed and assessed, and necessary actions taken if needed.
- 3. Disclosure of use of third-party cybersecurity risk management standards:
  - 3.3.1 Activants has been certified to be following ISO27001:2013 since August 2022. See *Appendix D* for certificate.
  - 3.3.2 The ISO 27001:2013 standards has been adopted according to the SOA (Statement of Applicability) which has been reviewed and audited by independent external auditors.



3.3.3 Key changes in Activants' overall approach to identifying vulnerabilities in its information systems and addressing data security risks and vulnerabilities:

With the implementation of ISO 27001:2013 since 2022, the key changes are as follows:

#### Systematic Risk-Based Approach

- Before ISO27001: Vulnerabilities might be identified reactively, often after incident occur, with inconsistent risk assessments.
- o With ISO 27001:
  - Risks are identified through a structured risk assessment process.
  - Focus shifts from ad hoc responses to proactively identifying, evaluating and prioritizing tasks.

#### Comprehensive Scope

- Before ISO 27001: Security efforts may focus narrowly on IT systems without considering broader organizational vulnerabilities.
- o With ISO 27001:
  - The ISMS covers all people, processes and technology involve in information management.
  - Vulnerabilities in areas such as human error, physical security, third-party risks and organizational policies are systematically addressed.

#### Implementation of Controls

- ISO 27001 provides a set of 114 security controls across
   14 domains, including access control, cryptography,
   incident management, and supplier relationships.
- Impact: Activants adopted a layered security approach, addressing vulnerabilities across multiple dimensions (e.g. technical, operational, organizational).

#### Continuous Monitoring and Improvement

- Before ISO 27001: Monitoring may be irregular or focus only on certain areas, such as network security.
- With ISO 27001:
  - Vulnerabilities are continuously monitored through mechanisms like internal audits, security incident



- **logs, and key performance indicators (KPIs)** for information security.
- The Plan-Do-Check-Act (PDCA) cycle ensures ongoing improvement of the ISMS and its ability to address new vulnerabilities as they emerge.
- Formalized Processes for Incident and Vulnerability
   Management
  - Before ISO 27001: Incident response might be informal, lacking documentation and consistent handling.
  - o With ISO 27001:
    - A documented incident response process ensures consistent identification, reporting, and mitigation of vulnerabilities.
    - Root cause analysis is integrated to prevent recurring vulnerabilities.
- Enhanced Stakeholder Awareness
  - Before ISO 27001: Awareness of security risks may be limited to the IT team.
  - With ISO 27001:
    - Security awareness training becomes mandatory for all employees, ensuring vulnerabilities related to human error are minimised.
    - Third-party vendors and suppliers are assessed for vulnerabilities as part of supplier relationship management.
- Improved Governance and Accountability
  - Before ISO 27001: Roles and responsibilities for managing vulnerabilities may be unclear.
  - o With ISO 27001:
    - Clear governance structures are established.
    - Information Security Roles are assigned to oversee vulnerability identification, risk mitigation and compliance.
- 3.3.4 As shown in <u>Appendix D</u>, Activants' use of cybersecurity risk management standards have been verified independently by the appointed 3rd party auditors, **SOCOTEC Certification Singapore Pte Ltd**.
- 3.3.5 The following regular activities have been undertaken in line with the use of ISO27001in Activants' cybersecurity risk management:



- 3.3.5.1 Daily temperature and humidity logging of server rack environment a temperature and RH sensor is placed in the server rack to always read the temperature and RH in the server environment.
- 3.3.5.2 Dedicated server rack room with air conditioning with the implementation of ISO27001:2013, the server rack has been relocated to a dedicated, 24/7 air-conditioned room to maintain the temperature and RH at an acceptable level, to keep the server rack functioning and to avoid disruptions in daily operations. As the server rack hosts Activants' development environments only, there is no risk to external customers in the event of equipment failure.
- 3.3.5.3 Regular backups of company NAS Project information such as documentation are stored in the company's NAS drives and are backed up to an offsite NAS at a frequency mandated by ISO 27001:2013 and in line with Activants' Business Continuity Plan (BCP).
- 3.3.5.4 Firewall logs firewall logs and system logs for Activants' NAS drives are inspected on a regular basis as mandated by ISO27001:2013.
- 3.3.5.5 User Access Matrix User access matrices have been created, reviewed and monitored at a frequency mandated by ISO27001:2013, and on an ad-hoc basis in the event of new staff joining and staff departing.
- 3.3.5.6 Change Request Logging Changes and amendments that are related to IT security or infrastructure go through a mandatory application, review and approval process, and documented accordingly.
- 3.3.5.7 Malware and Vulnerabilities Management Security patches approved by Activants IT Manager are pushed to servers on the 14<sup>th</sup> of every month. Vulnerability network scanning reports are reviewed and approved by Activants ISO Chairperson (Chief Service Deliver Officer).
- 3.3.5.8 Acceptable software list a list of approved software was compiled by Activants' IT Manager, reviewed and approved by the ISO Chairperson and regularly reviewed as mandated by ISO27001 policies.



- 3.3.5.9 Capacity Management Activants' NAS drives' capacities are managed as mandated by ISO27001 policies and reviewed at a frequency as mandated by ISO27001 policies.
- Activants has observed that attacks on its data security and information systems have primarily appeared in the form of phishing emails as covered in TC-SI-230a.1. It is not known where the attacks originated from, but Activants has been successful in detecting these attack attempts early and have not been a victim of such attacks.

#### **Summary**

#### **Actions Taken:**

- 1. Maintained ISO27001:2013 certification in 2023 and 2024.
- 2. Closely monitoring trends in cyberattacks and risk management standards.

#### **Future Plans:**

- Re-certification and transition to ISO27001:2022 from 2025 onwards.
- Maintain track records of zero data security breaches.



## 2.4 Recruiting & Managing a Global, Diverse & Skilled Workforce

### TC-SI-330a.1.

1. Percentage of Activants Pte Ltd employees that require a work visa in Singapore

Total number of employees:	55
Total number of employees requiring work visa:	21 (38%)

## 2. Risks and Mitigation measures in recruiting employees requiring work visas in Singapore

Risk	Risk Description	Mitigation Measures
Legal and Compliance Risks	Failure to comply with Singapore's work visa regulations (e.g. Employment of Foreign Manpower Act). This includes employing someone without a valid work pass or making errors in visa applications.	<ul> <li>Familiarize with Ministry of Manpower (MOM) requirements and procedures for hiring foreigners.</li> <li>Engage a licensed employment agency or legal consultant for advice on work visa applications.</li> <li>Regularly audit employment practices to ensure compliance with MOM regulations.</li> </ul>
Financial Risks	Penalties for non-compliance, including fines and potential debarment from hiring foreign employees. Additional costs may arise from administrative delays or failed visa applications.	<ul> <li>Allocate a budget for potential contingencies, including visa reapplication fees.</li> <li>Ensure accurate and complete submission of documents to reduce delays and rejections.</li> <li>Invest in systems or software to track visa validity and renewal dates.</li> </ul>
Reputational Risks	Non-compliance or unethical practices can damage the company's reputation, affecting relationships with clients, employees, and partners.	<ul> <li>Maintain transparency in all hiring practices</li> <li>Ensure that all work pass processes align with ethical labour practices.</li> <li>Provide clear communication to stakeholders about your commitment to compliance and integrity.</li> </ul>
Administrative Challenges	Complex work visa application processes and policy changes can cause delays or administrative burden.	<ul> <li>Train internal HR staff on the latest MOM regulations and processes.</li> <li>Use a centralized systems to manage employee documentation and work pass status.</li> <li>Stay updated on MOM policy changes by subscribing to their updates.</li> </ul>



Retention Risks	Foreign employees may leave the organization sooner than expected due to homesickness, cultural differences, or better job offers.	<ul> <li>Provide robust onboarding programs to help foreign employees adapt to the workplace and local culture.</li> <li>Offer competitive compensation packages and career development opportunities.</li> <li>Create a supportive environment by offering relocation assistance and access to resources like community groups.</li> </ul>
Dependency on Work Visa Approvals	If a visa application is rejected or delayed, it can disrupt business operations.	<ul> <li>Build a diverse talent pipeline that includes both local and foreign candidates.</li> <li>Have contingency plans, such as redistributing tasks among current employees while waiting for visa approvals.</li> <li>Work closely with MOM-approved agencies to minimize the risk of rejections.</li> </ul>
Ethical and Social Risks	Perception that the company is prioritizing foreign talent over local hires, leading to potential backlash.	<ul> <li>Ensure compliance with the Fair Consideration Framework (FCF) which requires fair hiring practices and local-first job advertising.</li> <li>Highlight the benefits of foreign talent, such as specialized skills, in internal and external communications.</li> <li>Actively support workforce localization by training and developing local employees for specialized roles.</li> </ul>

#### TC-SI-330a.2.

- 1. The source of the Employee Engagement Survey is from Activants' self-initiated annual survey conducted by the Human Resources department.
- 2. The summary of questions and statements included in the survey are outlined in Appendix E.
- 3. The summary the results of the survey on Employee Engagement are as per Appendix F. The methodology used in calculating Employee Engagement as a percentage is also shared in Appendix F.

Results from the survey indicates an approximately **60% to 80% agreement** (strongly agree or agree) to the statements in <u>Appendix E</u>.



#### TC-SI-330a.3.

 Percentage of gender representation among employees for executive management, non-executive management, technical employees and all other employees.

	Wom	en	Ме	Total	
Executive Management	1	20%	4	80%	5
Non-Executive Management	5	24%	16	76%	21
Technical Employees	9	19%	38	81%	47
All Other Employees	2	100%	0	0%	2
Total	17	23%	58	77%	75

 Percentage of diversity group representation among its employees for executive management, non-executive management, technical staff and all other employees.

	S	G	N	1Y	٧	'N	ı	N	M	IM	ı	D	ı	PH	Total
Executive Management	4	100%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	4
Non- Executive Management	14	64%	0	0%	0	0%	0	0%	0	0%	0	0%	5	23%	22
Technical Employees	5	11%	36	77%	2	4%	2	4%	2	4%	2	4%	0	0%	47
All Other Employees	2	100%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1
Total	25	33%	36	48%	2	2%	2	3%	2	3%	2	3%	5	7%	75

 $SG = Singapore\ Citizens,\ MY = Malaysians,\ VN = Vietnamese,\ MM = Myanmar\ Nationals,\ ID = Indonesians,\ PH = Filipinos$ 

- 3. Policies and programs for fostering equitable employee representation in global operations.
  - a. Establishing Clear Communication Channels
    - Open Door Policy: Encourage employees to voice concerns and suggestions directly to management, fostering transparency and trust.
    - Regular Meetings: Hold periodic meetings to discuss company updates, gather feedback and address employee concerns.
  - b. Develop an Employee Handbook



 Comprehensive policies: Create a handbook outlining company polices, employee rights, responsibilities, and codes of conduct. This ensures all employees are informed about workplace expectations and procedures.

#### c. Implement Grievance Procedures

 Formal Processes: Establish clear procedures for employees to report grievances, ensuring issues are addressed promptly fairly.
 This aligns with the Tripartite Guidelines on Expanding the Scope of Limited Representation for Executives.

#### d. Promote non-Discriminatory Practices

 Equal Opportunity Employment: Adopt hiring and employment practices that prevent discrimination based on age, gender, race, religion, or other protected characteristics. This is in line with the upcoming Workplace Fairness Legislation (WFL) which aims to strengthen protections against workplace discrimination.

#### e. Encourage Employee Feedback

 Surveys and Suggestions Boxes: Regularly solicit employee feedback through anonymous surveys or suggestion boxes to identify areas for improvement and address concerns.

#### f. Provide Training and Development Opportunities

 Skill Enhancement Programs: Offer training sessions to help employees develop professionally, demonstrating the company's commitment to their growth and wellbeing.

#### g. Ensure Compliance with Employment Laws

 Adherence to the Employment Act: Comply with Singapore's Employment Act, which governs employment terms and conditions, to ensure fair treatment of all employees.

#### h. Facilitate Union Representative if Applicable

- Union Engagement: If employees express interest, facilitate discussions with relevant trade unions to explore representation options, keeping in mind the guidelines on union representation for executives.
- i. Career Coaching Workshops: Conduct workshops to help employees build skills like goal setting, networking, and leadership.
- j. Mentor-Mentee Matching Platform: Develop a platform where employees can apply for mentorship opportunities based on their career aspirations.
- k. Leadership Pathway Coaching: Offer tailored coaching for employees aspiring to leadership roles, providing them with the tools and knowledge to prepare for future responsibilities.



## 2.5 Intellectual Property Protection and Competitive Behaviour

#### TC-SI-520a.1.

- 1. Activants has not been involved in any anti-competitive behaviour such as price fixing, anti-trust behaviour, patent misuse, or network effects such as bundling services and products to limit competition.
- Activants has not been subjected to any legal proceedings associated with any anti-competitive behaviour such as price fixing, anti-trust behavior, patent misuse, or network effects such as bundling services and products to limit competition

#### **Summary**

**Metric**: Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations.

#### • 2024 Performance:

Total amount of monetary losses: 0

#### **Actions Taken:**

There were no related breeches hence no action is necessary.



# 2.6 Manging Systemic Risks from Technology Disruptions

#### TC-SI-550a.1.

- 1. Number of performance issues in software and information technology (IT) services provided to customers.
- 1.1 Planned or unplanned downtime causing an interruption of more than 10 mins but less than 30 mins, in the provision of cloud-based services to customers.
- 1.2 Performance issues caused by technical failures, programming errors, cyber-attacks, weather events or natural disasters at hosting facilities.

Activants does not provide cloud-based services to our customers. The software designed and implemented by Activants are hosted at our customers' premises and designated data centres, with infrastructure managed by the facilities management vendor appointed by respective customers.

- 2. Number of service disruptions in software and IT services provided to customers.
- 2.1 Planned or unplanned downtime causing an interruption of more than 30 mins in provision of cloud-based services to customers.
- 2.2 Service disruptions include those caused by technical failures, programming errors, cyber-attacks, weather events or natural disasters at hosting facilities.

For each significant service disruption, the entity shall disclose the duration of the disruption, the extent of the disruption and the root cause, as well as any corrective actions taken to prevent future disruptions. Where material, the entity shall disclose the associated cost incurred, such as remediation costs to correct technology or process issues, as well as any liability costs.

A service disruption is considered significant if the cost to it is material or if it is disruptive to many customers or fundamental business operation in a manner that affects time to market, revenue capture or other material parameters.

Activants does not provide cloud-based services to our customers. The software designed and implemented by Activants are hosted at our customers' premises and designated data centres, with infrastructure managed by the facilities management vendor appointed by respective customers



3. Total customer downtime caused by technical failures, programming errors, cyberattacks, weather events or natural disasters at hosting facilities.

Activants does not provide cloud-based services to our customers. The software designed and implemented by Activants are hosted at our customers' premises and designated data centres, with infrastructure managed by the facilities management vendor appointed by respective customers.

## TC-SI-550a.2 Description of business continuity risks related to disruptions of operations

Potential business continuity risks associated with technology disruptions affecting operations

Activants Pte Ltd has, since 2018, drafted and continuously updated a Business Continuity Plan (BCP) with the purpose of preparing the company to respond to extended service outages caused by factors beyond the Activants' control. Extended service outages due to technology disruptions can be caused by several factors, and Activants has listed the following disruptions and their causes which are relevant in their context:

Technological Disruptions	Identified Causes	Possible Impact			
Unable to use Internet services for business operations	Disruption to Internet Services (e.g. infrastructure damage, replacement, servicing) which cannot be controlled or managed by Activants.	1. Unable to send/receive emails from colleagues, team members, customers, suppliers, vendors.  2. Delays in communication  3. Reduced efficiency in operations.  4. May not be able to meet tender submission datelines if submissions are via email.  5. Virtual meetings (e.g. MS Teams, Zoom, etc.) not possible from the office, affects ability to virtually meet customers, team members, supplier and vendors.			
One or more employees locked out of their email accounts/laptops/user accounts.	Cyber Attacks (e.g. hacking, ransomware)	1. Unable to perform work normally, or any work at all. 2. Company may be threatened with further damages from ransomware (e.g. paying ransom to recover crucial data, resources, etc.).			
Delay in customers' software application issue resolution	Programming Errors	Delays in issue resolution for customers.     Time wasted in investigation and inspection of codes/logic.			



3. Risk of not meeting Service
Level Agreements (SLAs) with
customers.

### 2. Measures implemented to manage business continuity risks

To address the identified disruptions above, Activants will use the following measures:

Technological Disruptions	Identified Causes	Implemented Measures
Unable to use Internet services for business operations	Disruption to Internet Services (e.g. infrastructure damage, replacement, servicing) which cannot be controlled or managed by Activants.	1. In the case of prolonged, companywide Internet service disruptions, the Management may decide to ask all employees to work from home, if the Internet services at their residences are not also affected.  2. The Management may also ask all employees to connect their work laptops to their own mobile phone hotspots temporarily, for crucial and urgent cases only, with the agreement of the employee(s).  3. The Management may decide to rent a co-shared workspace if the Internet service disruption is prolonged and cannot be recovered within a day.
One or more employees locked out of their email accounts/laptops/user accounts.	Cyber Attacks (e.g. hacking, ransomware)	1. The affected laptop(s) or account(s) will first be isolated or erased by the IT Service Manager.  2. If the impact can be isolated, the affected employee(s) will be issues a new laptop/user account temporarily. In the scenario that the impact cannot be isolated/traced and becomes widespread, the management will trigger an emergency broadcast to all staff via mobile messaging applications to inform staff not to use their company issued laptops and will engage cybersecurity specialists for advice and rectification.  3. Preventive measures include firewalls, VPN accounts, active directory accounts which have already been implemented. Firewall logs and administrative function logs are reviewed frequently as recommended by Activants' ISO 27001:2013 policies for abnormalities.



Delay in customers' software application issue resolution	Programming Errors	1. Software application errors are				
		prioritized according to the definition set in respective Service Level Agreements (SLA) and resolved within				
					the duration set in the SLAs with	

### 3. Critical Business Operations Support Cloud-Based Services

Activants does not provide cloud-based services to our customers. The software designed and implemented by Activants are hosted at our customers' premises and designated data centres, with infrastructure managed by the facilities management vendor appointed by respective customers



## 3. Governance

#### Oversight of ESG Issues:

- Sustainability governance is led by the Operations Manager, who reports directly to the Managing Director.
- Climate-related and employee well-being risks are reviewed quarterly in management meetings.

#### **Integration into Strategy:**

 Environmental and social considerations are incorporated into operational decision-making, with a focus on reducing energy costs and enhancing employee satisfaction.



## 4. Financial Implications and Opportunities

#### Risks:

- 1. **Energy Costs**: Rising electricity rates in Singapore may increase operating expenses by ~5%.
- 2. **Regulatory Compliance**: Non-compliance with PDPA could result in fines and reputational damage.

#### **Opportunities:**

- 1. **Cost Savings**: Optimized server efficiency saved approximately SGD 3,000 in electricity costs in 2025.
- 2. **Employee Retention**: High employee satisfaction contributes to reduced recruitment and training costs.

### 5. Conclusion and Future Goals

#### 5.1 Achievements in 2024:

- Zero data breaches, demonstrating strong data privacy and security measures.
- Improved gender diversity and employee satisfaction.

#### 5.2 Goals for 2025:

- 1. Reduce energy consumption by 5%.
- 2. Maintain zero data breaches while enhancing data security systems.
- 3. Further increase employee satisfaction and diversity through targeted initiatives.
- 4. Recertification and transition for ISO27001:2013 to ISO 27001:2022
- 5. Feasibility study on alternative sources of electrical energy

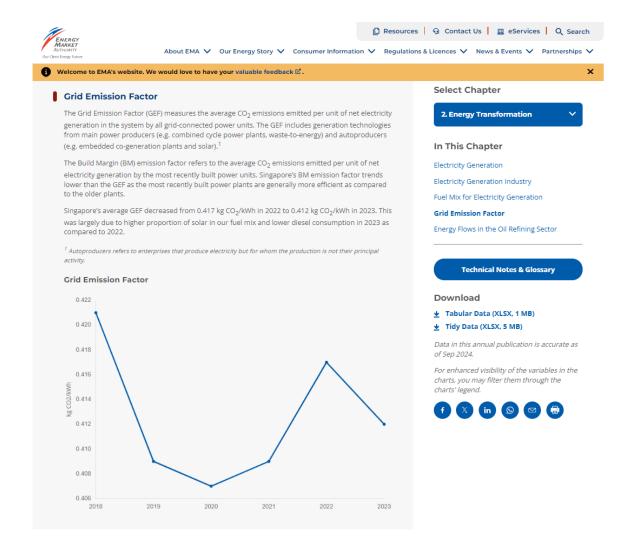
## Prepared by Activants Pte Ltd

**Contact Information:** 

Chua Kai Ping Kevin kevin@activants.com 6684 7044



## Appendix A: Electricity Emissions Factor published in Energy Market Authority of Singapore's website.





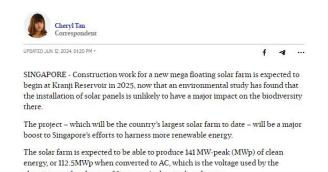
# **Appendix B: Construction of Singapore's Largest Floating Solar Farm in 2025**

THE STRAITS TIMES SINGAPORE ♣ LOG IN ST SUBSCRIBE (PD) Q ≡

#### Construction of S'pore's largest floating solar farm at Kranji Reservoir to begin in 2025

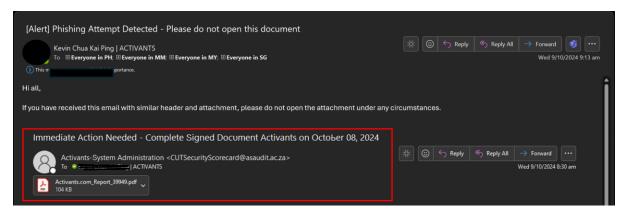


The solar farm is expected to be able to produce 141 megawatt-peak of clean energy. ST PHOTO: WALLACE WOON

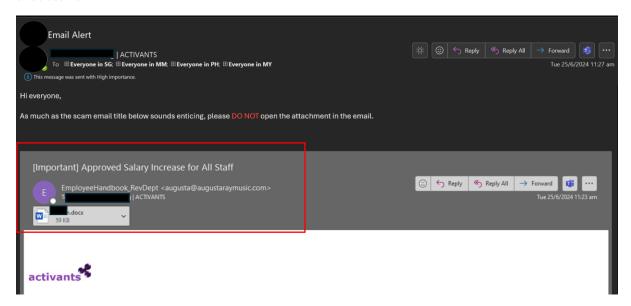




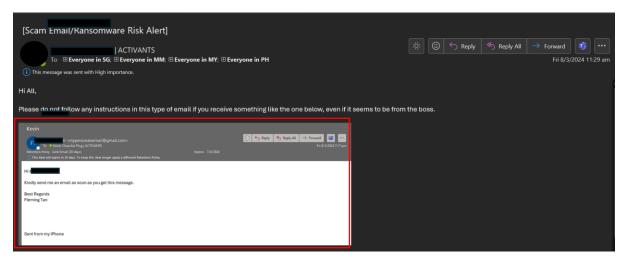
# Appendix C: Screenshot of Data Breach/Phishing Attempt received by Activants Pte Ltd in 2024.



#### 8th October 2024

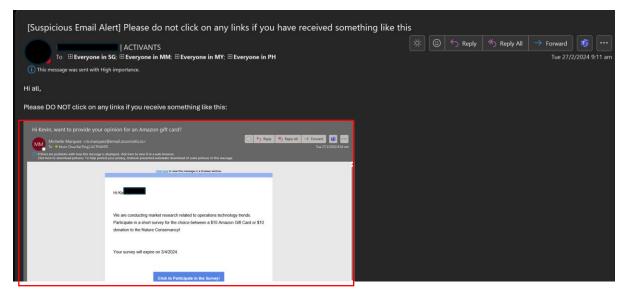


25<sup>th</sup> June 2024



8th March 2024





27<sup>th</sup> February 2024



## Appendix D: Activants Pte Ltd ISO27001:2013 Certificate





# Appendix E: Summary of Employee Engagement Survey Questions Used

Category/Area	Questions/Statements				
Likert Scale Questions					
Job Satisfaction	I am enthusiastic about my work and enjoy my daily tasks.				
	I feel my work is meaningful and makes a difference.				
Connection with the Organization	I feel connected to the organization's values and mission.				
	I understand how my role contributes to the company's overall success.				
Work Relationships	I feel supported by my colleagues in achieving work goals				
	My manager provides clear communication and guidance.				
Recognition and Development	I feel my contributions are valued and recognized by the organization.				
	I have opportunities for growth and development within the company.				
Overall Engagement	I am motivated to go above and beyond the expectations of my role.				
	I have opportunities for growth and development within the company.				
Open Ended Questions					
	What aspects of your job do you find most fulfilling or rewarding?				
	What improvements can be made to help you achieve your goals?				
	What suggestions do you have to improve work processes?				



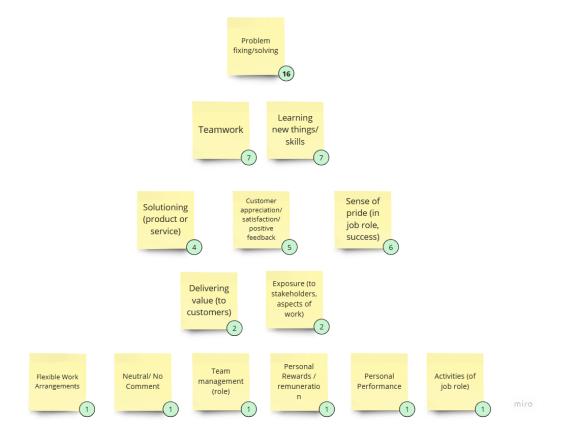
# Appendix F: Summary of Employee Engagement Survey Results and Calculation Methodologies Used

Category/Area	Questions/Statements	Strongly Agree (%)	Agree (%)	Neutral (%)	Disagree (%)	Strongly Disagree (%)	Total (%)
Job Satisfaction	I am enthusiastic about my work and enjoy my daily tasks.	39	34.1	22	4.9	0	100
	I feel my work is meaningful and makes a difference.	36.6	34.1	22	7.3	0	100
Connection with the Organization	I feel connected to the organization's values and mission.	31.7	43.9	22	2.4	0	100
	I understand how my role contributes to the company's overall success.	34.1	51.2	9.8	4.9	0	100
Work Relationships	I feel supported by my colleagues in achieving work goals	39	39	17.1	4.9	0	100
	My manager provides clear communication and guidance.	39	39	14.6	4.9	0	100
Recognition and Development	I feel my contributions are valued and recognized by the organization.	26.8	51.2	19.5	2.4	0	100
	I have opportunities for growth and development within the company.	29.3	29.3	31.7	7.3	2.4	100
Overall Engagement	I am motivated to go above and beyond the expectations of my role.	36.6	34.1	22	7.3	0	100
	I would recommend this company as a great place to work.	39	22	31.7	7.3	0	100



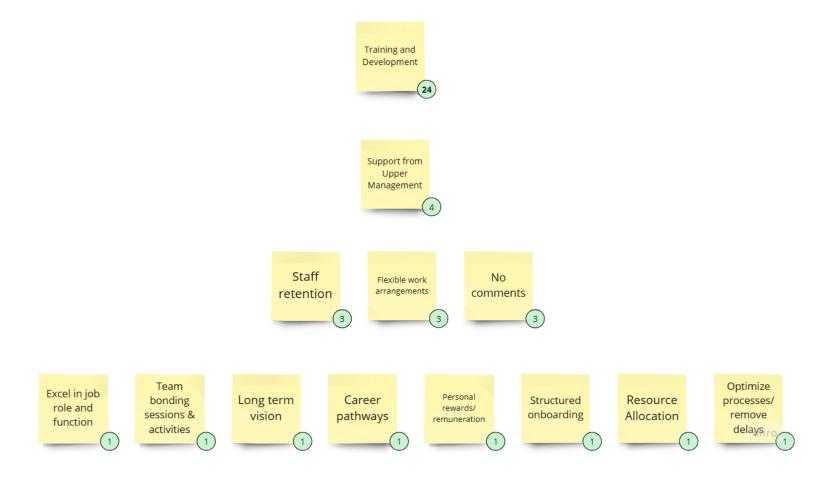
## **Appendix G: Employee Survey Results – Open Ended Questions**

What aspects of your job do you find more fulfilling and rewarding?



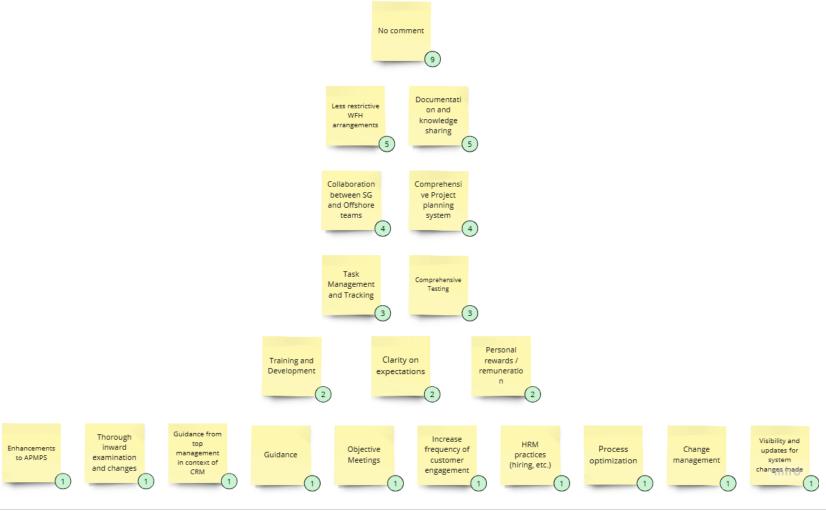


What improvements can be made to help you achieve your goals?





## What suggestions do you have to improve work processes?





## **References:**

- 1. <u>EMA | SES Chapter 2: Energy Transformation</u> for Electricity Emissions Factor (TC-Si-130a.1 to 3)
- 2. Construction of S'pore's largest floating solar farm at Kranji Reservoir to begin in 2025 | The Straits Times for Electricity Emissions Factor (TC-Si-130a.1 to 3)
- 3. The Energy Label for Electricity Emissions Factor (TC-Si-130a.3)