



# Sustainability Report

01 JANUARY 2024 – 31 DECEMBER 2024

WEBSPARKS



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# Company Profile

(GRI 2-1, 2-6)

Established in 2008, Websparks is a leading provider with a suite of innovative web solutions from applications to digital marketing to help clients achieve their goals through custom web solutions. In recognition of environmental responsibilities, Websparks is committed to adhering to the highest standards of sustainability. We believe in fostering a collaborative environment within the IT sector to promote greener technologies, sustainable practices, and innovative business models.

A Microsoft Certified Silver Partner, a certified Progress Sitefinity Premium Partner and Sitecore Solutions Partner as well as ISO 9001:2015 and ISO/IEC 27001:2022 certified company in Singapore with over 15 years of experience and over 550 successful projects delivered across diverse industries, we have a proven track record of delivering exceptional digital experiences and creating impact. We envision becoming the fastest-growing “Digital Office” in ASEAN. Our core values are collaboration, curiosity, commitment, and a drive to challenge the status quo.

## LOCATION OF OPERATIONS

(GRI 2-1, 2-2)

Websparks has presence in Singapore, Vietnam, Philippines and Indonesia, with our headquarters based in Singapore. This report specifically addresses the operations conducted in Singapore.

## MEMBERSHIP ASSOCIATIONS

(GRI 2-28)

Websparks has been awarded LowCarbonSG in recognition of our decarbonisation efforts in 2023. We are recognised by GCNS and World Bank as Carbon Pricing Leadership Coalition (CPLC) Singapore Partner. Websparks is a member of SGTech.



# CEO's Message

(GRI 2-22)



At Websparks, we see it as our responsibility to create lasting value for our business, stakeholders, and the environment. We continue to focus on upholding strong corporate governance through exemplary board stewardship, fostering transparency, and strengthening risk management at all levels of our organisation.

Recognising that we cannot achieve sustainability goals alone, we aim for open communication and collaboration with our stakeholders, continue to integrate their insights into our strategies, and drive meaningful progress toward a more sustainable future.

Websparks remains dedicated to reducing our environmental impact by exploring the use of innovative green technologies and championing sustainable practices within our industry.

Let's work together to create a future where sustainability is integrated with business.

**Mr Ng Chee Chiu**  
**Founder & Senior Project Director**  
**Websparks Pte Ltd**





# About This Report

## REPORTING FRAMEWORK

(GRI 2-3)

The report has been compiled with reference to the Global Reporting Initiative (GRI) Standards, which serves as a framework for businesses to articulate their influence on diverse Environmental, Social, and Governance (ESG) concerns. We used industry standard Sustainability Accounting Standards Board (SASB) criteria to identify our Material Topics and used the International Financial Reporting Standards (IFRS) S1 and S2 framework to deliberate on risk and opportunities and to declare the assessment on our business operations and financial performance based on the effects of climate change.

## REPORTING PERIOD

(GRI 2-3)

01 January 2024 – 31 December 2024

## EXTERNAL ASSURANCE

(GRI 2-5)

No external assurance was sought for this report.



## FEEDBACK

We welcome feedback from our stakeholders to help us further our sustainability journey. Or, if you would like to learn more about our ESG initiatives, please contact:

### **Websparks Pte Ltd**

Contact: [sustainability@websparks.sg](mailto:sustainability@websparks.sg)

Address: 61 Kaki Bukit Avenue 1 #04-08, Shun Li Industrial Park, Singapore 417943

Website: <https://www.websparks.sg>

# Sustainability Vision and Guiding Principles

(GRI 2-22)

Aligned with Singapore's Green Plan 2030, we took the Green Nation Pledge and are a Contributor since 2023. We formulated our first sustainability strategy to be a leader in eco-friendly web solutions. We aligned our ESG practices with leading reporting frameworks (GRI, SASB and IFRS S1 and S2) for global compatibility to integrate environmental and social responsibilities into our operations to move our business towards decarbonisation.

## GUIDING PRINCIPLES

Our sustainability strategy is underpinned by the following guiding principles:

### TRANSPARENCY & COMMUNICATION

Publish a policy, report progress and collaborate with stakeholders.

### RESOURCE EFFICIENCY

Write efficient code and promote cloud solutions.

### DEVELOP SUSTAINABLE WEB SOLUTIONS

Offer website optimisation tools ([sitespeed.io](https://sitespeed.io)) for faster loading times (reducing server energy consumption).

### RESPONSIBLE DATA MANAGEMENT

Minimise data collection, encryption when possible and data deletion options.

### ETHICAL SOURCING & PARTNERSHIPS

Partner with responsible vendors, consider open-source alternatives and advocate for e-waste disposal solutions.



# Key Performance Highlights and Targets

<b>PILLAR 1 – ENVIRONMENTAL STEWARDSHIP</b>	
<b>FY2024 Progress</b>	<b>FY2025 Goals</b>
Total energy consumption of 40.95 MWh (3.4% lower than FY2023)	40.30 MWh (-1.5% from 2024 figure)
Intensity ratio of 0.297 (GHG emissions per employee)	0.293 (-1.5%) from 2024 figure)
<b>PILLAR 2 – SOCIAL: INVESTING IN OUR PEOPLE AND COMMUNITY</b>	
<b>FY2024 Progress</b>	<b>FY2025 Goals</b>
The average training hours per employee is 18.2 hours	25 hours per employee
70:30 gender ratio of male and female employees and 21:79 young and older employees respectively	Maintain 70:30 gender ratio of male and female employees, with similar balance (21:79) of young and older employees respectively.
<b>PILLAR 3 – GOVERNANCE: TRANSPARENCY AND ACCOUNTABILITY</b>	
<b>FY2024 Progress</b>	<b>FY2025 Goals</b>
Anti-corruption Policy: No incident relating to corruption and/or bribery.	Maintain 0 incident relating to corruption and/or bribery.
Whistle-blowing Policy: 24/7 access to whistleblowing channel to every employee.	Maintain 24/7 access to whistleblowing channel for every employee.
Data Protection Policy: Adhered to ISO 27001 standards (re-certified in 2024). No breaches reported in 2024	Maintain ISO 27001 certification
Data Protection Policy: No data protection incidents in 2024; DPO appointed to update policies and pursue 2025 DPTM certification.	Data Protection Trust Mark -DPTM certification in 2025

# Governance

(GRI 2-9, 2-12, 2-13, 2-14)

Websparks integrates climate considerations into its business strategy, adhering to International Financial Reporting Standards (IFRS) S1 and S2. The Company operates under a shared responsibility framework, emphasising climate action across all levels. The Executive Committee, guided by Director, Mr. Ng Chee Chiu, provides oversight on ESG risks, with a dedicated Sustainability Committee responsible for assessing, managing and disclosing ESG risks. The Sustainability Committee ensures accountability and transparency in managing sustainability-related risks and opportunities in line with the Company's business goals, reporting to the Executive Committee for oversight throughout the organisation.



Figure 1: Webspark's Sustainability Governance Structure

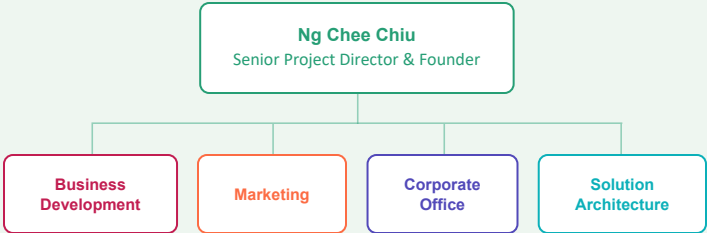


Figure 2: Webspark's Sustainability Committee

The Sustainability Committee comprises of employees from diverse departments, such as, Business Development, Marketing, Corporate Office, and Solution Architecture. Mr. Ng provides strategic direction to the Sustainability Committee, while the committee drives and implements its goals by ensuring sustainability is integrated across all business functions. The executive committee actively promotes the sustainability initiatives and ensures the participation of its employees to achieve long-term climate resilience and ESG performance targets. The company supports high ethical standards and promotes a culture of integrity through its Code of Ethics and Business Conduct. Management teams are responsible for evaluating and mitigating sustainability-related risks, with inputs from governance bodies to ensure their integration into strategic decision-making.



COMMITTEE’S ROLES IN ASSESSING AND GOVERNING SUSTAINABILITY-RELATED RISKS AND OPPORTUNITIES

By gathering and analysing ESG-related data from across the business, the Sustainability Committee provides the Board a consolidated view of the risks and opportunities. The Committee’s responsibilities include writing up the ESG sections of the annual report, providing all required ESG disclosures, and promoting a collective understanding of the Environmental, Social, and Governance (ESG) factors within the industry.

Key objectives include emphasising the importance of environmental measures and sustainability goals at all levels, providing best practices on relevant structures and regulations, increasing understanding of corporate governance and social aspects, and implementing common, workable standards of corporate governance for the business. This comprehensive approach enables the organisation to proactively address sustainability-related risks and capitalise on emerging opportunities.



ROLE	CLIMATE RISKS AND CLIMATE STRATEGY ROLES AND RESPONSIBILITIES	MEETING FREQUENCY
Senior Project Director / Founder	<ul style="list-style-type: none"><li>Oversees the operations of the sustainability team</li><li>Approves key documents and processes required</li><li>Formulates and updates sustainability policies</li></ul>	Annually
Business Development Team	<ul style="list-style-type: none"><li>Coordinates and ensures smooth undertaking of processes</li><li>Collaborates with stakeholders to communicate sustainability initiatives</li></ul>	Annually
Marketing Team	<ul style="list-style-type: none"><li>Assists with administrative processes related to sustainability initiatives</li><li>Collaborates with stakeholders to communicate sustainability initiatives</li></ul>	Annually
Corporate Office Team	<ul style="list-style-type: none"><li>Oversees HR policies and processes</li><li>Implements and aligns new office policies and processes to sustainability initiatives</li></ul>	Annually
Solution Architecture Team	<ul style="list-style-type: none"><li>Oversees technical related policies and processes</li><li>Implements and aligns new processes to sustainability initiatives</li></ul>	Annually

Table 1: Websparks’ Sustainability Committee Roles and Responsibility

## STAKEHOLDER ENGAGEMENT

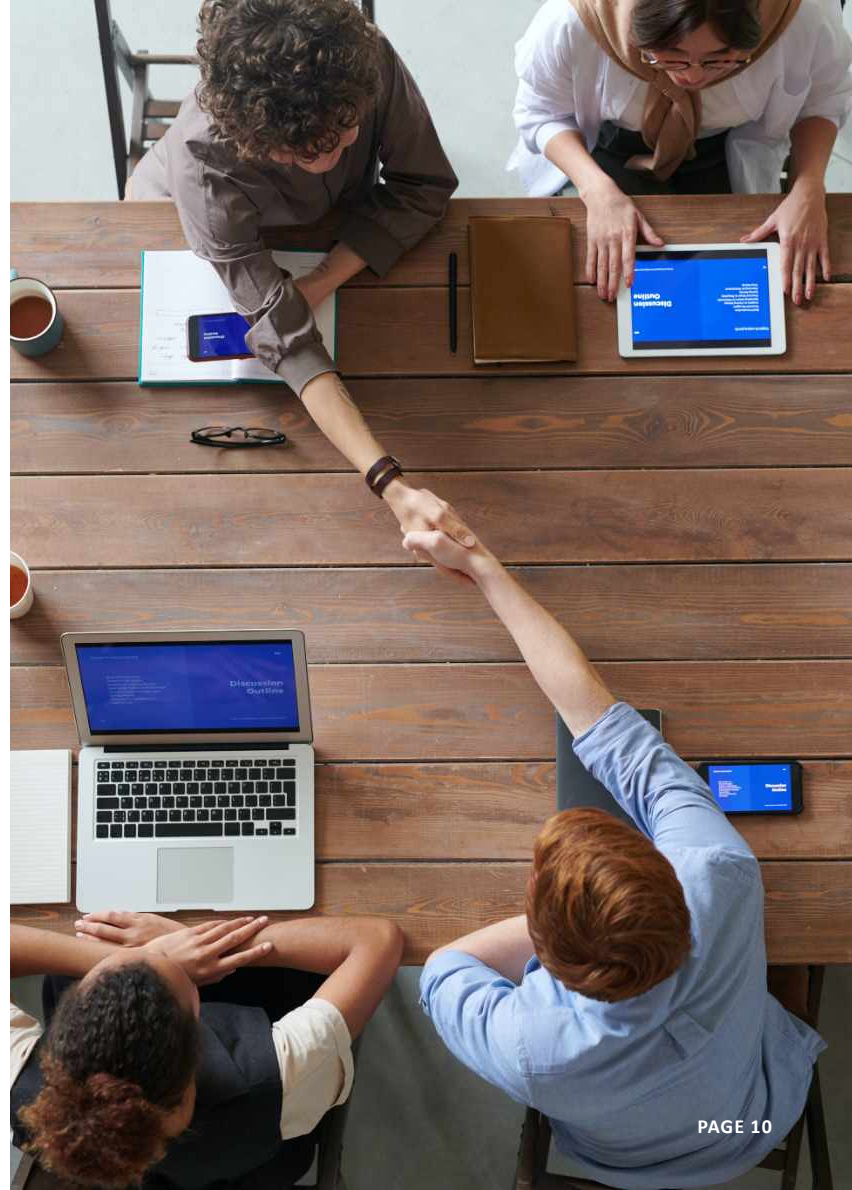
(GRI 2-29)

Websparks also fosters strong stakeholder engagement by prioritising transparency and open communication, ensuring that our stakeholders are informed of our progress and aligned with our sustainability goals.

By setting up clear governance for ESG matters and embedding sustainability-related considerations into business processes, Websparks is driving sustainability across the organisation while preserving longterm value and promoting resilience against climate change.

Stakeholder engagement is crucial for Websparks to achieve long-term sustainable success. We have engaged with key stakeholders, including clients, employees, investors, suppliers, regulators, local communities, NGOs, and industry associations, through both informal and formal channels such as face-to-face meetings and digital communication. Moving forward, we will prioritise stakeholder engagement based on their relevance and impact on our business and implement more structured engagement methods.

Websparks engaged with stakeholders in 2024 and will continue to engage other stakeholders such as consultations with government and regulators to keep our stakeholder engagement relevant on high-priority issues.







STAKEHOLDERS	FREQUENCY AND ENGAGEMENT PLATFORM	TOPIC OF INTEREST	RESPONSE
 Customers	<ul style="list-style-type: none"> <li>Annual engagements through various digital communication channels</li> <li>Annual customer feedback surveys</li> <li>Sustainability report</li> </ul>	<ul style="list-style-type: none"> <li>Quality and variety of products and services</li> <li>End-to-end customer journey</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining open lines of communication with customers to understand their needs and identify opportunities to improve the quality and variety of products and services.</li> <li>Improving service quality and customer satisfaction scores by taking into consideration feedback from customer surveys and providing appropriate service recovery to maintain customer's confidence.</li> </ul>
 Suppliers & Partners	<ul style="list-style-type: none"> <li>Annual meetings with suppliers and partners through various digital communication channels</li> <li>Green procurement practices and annual suppliers' reviews</li> <li>CDP report and compliance to LowCarbonSG</li> </ul>	<ul style="list-style-type: none"> <li>Suppliers' performance and practices</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining regular engagement with suppliers and partners to ensure smooth operations in the supply chain.</li> <li>Developing a more efficient and better customer experience by acting on feedback from stakeholders</li> </ul>
 Employees	<ul style="list-style-type: none"> <li>Annual employee surveys</li> <li>Internal communications such as brown bag and townhall sessions; and ad hoc engagement sessions</li> <li>Internal communication through Email, Teams and Confluence</li> </ul>	<ul style="list-style-type: none"> <li>Workplace health and safety, and work environment -related concerns</li> <li>Career planning and development schemes, and available resources</li> <li>Employee policies, well-being, welfare, and activities</li> </ul>	<ul style="list-style-type: none"> <li>Updating employees on relevant topics, helping them with their personal development and career growth, and incorporating employee feedback.</li> <li>Promoting a healthy work environment, informed by regular feedback, through the revamp and upgrade of its risk management framework and enhancement of its employee well-being policies and procedures.</li> <li>Communicating important information through an employee handbook and regular briefing to employees on everyday sustainable habits to raise awareness on Websparks' sustainability commitments</li> </ul>
 Government & Regulators	<ul style="list-style-type: none"> <li>Meeting CDP reporting requirements</li> <li>LowCarbonSG regulatory compliance</li> </ul>	<ul style="list-style-type: none"> <li>Economic Growth: Job creation, market stability, sustainable development, and fiscal responsibility</li> <li>Public Safety: Physical safety, public health, social well-being, and community safety.</li> <li>Environmental Protection: Climate change mitigation, pollution control, and resource management.</li> </ul>	<ul style="list-style-type: none"> <li>Sharing timely and accurate ESG information, including sustainability-related updates, through regular reporting.</li> <li>Collaborating actively with government and regulators on shared sustainability goals through working groups, expertise sharing, and policy support.</li> <li>Prioritising full regulatory compliance and striving to exceed requirements by adopting best practices and welcoming regulatory feedback for further enhancement.</li> <li>Integrating climate considerations into Websparks' business and collaborate with government and regulators to address key sustainability challenges like climate change.</li> </ul>

Table 2: Websparks' Stakeholder Engagement Matrix

# Strategy

(GRI 3-1, 3-2, 3-3)

(IFRS S1 Sustainability-related risk & opportunities: 30-31)

(IFRS S2 Climate-related risk & opportunities: 10-12)

This section shows the strategy for managing sustainability and climate related risks and opportunities that could reasonably affect Websparks' prospects and its business model and value chain.

In 2023, we conducted a materiality assessment with our internal stakeholders to identify and prioritise the environmental, social and governance (ESG) issues most significant to our business and stakeholders so that we can focus on the most critical and relevant areas. In subsequent years, we intend to engage both internal and external stakeholders for our materiality assessment. We referred to Sustainability Accounting Standards Board (SASB) standards to identify the most financially material topics to our company in the Software and IT Services Industry. These topics have been reviewed for 2024 and remained relevant to Websparks. The following are the top 9 material topics and initiatives, grouped into 3 key Pillars:



PILLARS	MATERIAL TOPICS
<b>Pillar 1: Environmental Stewardship</b>	<ol style="list-style-type: none"><li>1. Energy [GRI 302]</li><li>2. Emissions [GRI 305]</li><li>3. Waste [GRI 306]</li></ol>
<b>Pillar 2: Social – Investing in Our People and Community</b>	<ol style="list-style-type: none"><li>4. Talent attraction and retention [GRI 401]</li><li>5. Training and education [GRI 404-1, 404-2, 404-3]</li><li>6. Diversity and Equal opportunity [GRI 405-1]</li></ol>
<b>Pillar 3: Governance – Transparency and Accountability</b>	<ol style="list-style-type: none"><li>7. Anti-corruption [GRI 205-1, 205-2]</li><li>8. Whistleblowing policy [GRI 2-26]</li><li>9. Data protection [GRI 418-1]</li></ol>

Table 3: Materiality Topics Mapped to Websparks' Sustainability Pillars

## PILLAR 1: ENVIRONMENTAL STEWARDSHIP

At Websparks, we are working towards reducing our carbon footprint. To align ourselves with the 2030 Singapore Green Plan and Net-zero 2050, we have taken the first steps to measure our carbon emissions through scope 1, 2 and selected categories of scope 3 emissions. Our key policies and commitments on environmental stewardship are as follows:

### HYBRID WORK ARRANGEMENT

Websparks' hybrid work model lets employees work from home to cut emissions by reducing commuting and office energy use.

### GREEN CODING PRACTICES

We use green coding to create energy-efficient websites (refined by using Lighthouse and Sitespeed.io). This reduces server load and helps shrink our carbon footprint. We adopt best practices like:

- Writing code that is reusable and modular.
- Minifying and optimising resources like reducing the amount of data that needs to be transmitted over the network.
- Promoting reusable implementation and continuous monitoring to find codes that can be optimised or made more efficient.

### GREEN HOSTING SERVICES

Our WebAble Host platform offers eco-friendly hosting powered by AWS's renewable energy sources (where available). This reduces our digital footprint (verified by the Green Web Foundation).

Our sustainability committee will continue to finetune our environmental policies. We aim to continually track and record our energy and waste consumption from our operations and integrate changes in our daily operations to reduce them by engaging with our employees and partners to increase awareness and set achievable targets.



## PILLAR 2: SOCIAL – INVESTING IN OUR PEOPLE AND COMMUNITY

As a knowledge-based company, our employees are our greatest asset. That is why our social sustainability efforts prioritise empowering them to reach their full potential. We focus on five key areas:

### TALENT ATTRACTION & RETENTION

We attract top talents and foster a positive work environment to keep them engaged and thriving.

### TRAINING & EDUCATION

We invest in comprehensive training programs and opportunities to help employees continually develop their skills and knowledge.

### DIVERSITY & EQUAL OPPORTUNITY

We cultivate an inclusive work environment where everyone feels valued and can excel, regardless of background.

### CONTRIBUTING TO COMMUNITIES

(GRI 201-1)

We are committed to giving back to the communities where we are at. In FY2023, we started a partnership with the Singapore Children's Society through a financial contribution. We are actively exploring further collaboration opportunities to support their vital work for children in need.

### HUMAN RIGHTS

We are committed to upholding fundamental human rights and promoting their protection within our organisation and throughout our supply chain. We will act responsibly and comply to our Human Rights Policy, Code of Ethics, and Business Conduct to ensure fair treatment, and equal opportunities for all.

By prioritising these areas, we create a vibrant and supportive workplace that fuels our long-term success.





## PILLAR 3: GOVERNANCE – TRANSPARENCY AND ACCOUNTABILITY

At Websparks, we believe that effective governance is essential for genuinely weaving sustainability and ESG into every aspect of our business.

This report outlines the key policies and practices that guide our sustainable operations, highlighting our strong commitment to transparency and accountability. We are dedicated to continuous improvement and have formalised our anti-corruption, whistleblowing and data protection policies as our reinforcement and commitment to the highest standards of integrity.

### ANTI-CORRUPTION

(GRI 205-1, 205-2)

Websparks maintains an uncompromising zero-tolerance policy on bribery, corruption, and all forms of unethical conduct. It is a fundamental principle rigorously enforced through a robust Code of Ethics and Business Conduct, comprehensive and continuous ethics training programs designed to address the complex and evolving landscape of corruption risks (including those posed by third-party relationships and complex operating environments). Our leadership is deeply committed to fostering a culture of absolute integrity. This commitment goes beyond simply reacting to problems; we proactively identify and mitigate potential risks. We recognize that bribery can be subtle and insidious, requiring a comprehensive approach that includes more than just traditional whistleblowing mechanisms. We are dedicated to fostering a corporate culture where ethical conduct is not only expected, but intrinsically embedded in every decision, action, and interaction.

In 2024, we did not have any incidents or cases related to corruption and/or bribery.

### WHISTLEBLOWING

(GRI 2-26)

Websparks is committed to a safe and ethical workplace. Employees can easily and confidentially report concerns through several established channels, including directly to the Senior Project Director/ Founder. We understand the importance of prompt and correct information about potential issues and have a robust system in place to thoroughly investigate all reports and take proper action quickly. We are unwavering in our dedication to preventing and addressing discrimination, harassment, and unethical behaviours. Our accessible and responsive reporting system empowers employees to raise concerns without fear of reprisal.

### DATA PROTECTION

(GRI 418-1)

Websparks prioritises customer data protection, adhering to both Singapore's Personal Data Protection Act (PDPA) and the internationally recognised ISO 27001 standard, which we have been certified with since 2021 and re-certified in early 2024. Our robust controls, including access restrictions, incident response procedures, and data encryption, protect client information according to the requirements of these frameworks for data collection, use, disclosure, and care. A transparent, PDPA-compliant privacy policy and thorough employee training ensure responsible data handling company-wide. These measures minimise the risk of data breaches, build client trust, and show our commitment to data protection.

The following table summarizes the risks and opportunities in our business operations that are aligned to the 3 pillars in our sustainability strategy:

## PILLAR 1: ENVIRONMENTAL STEWARDSHIP

RISKS	BUSINESS IMPLICATIONS	RISK RESPONSE/MANAGEMENT AND OPPORTUNITIES	TIME SCALE	RISK RATING-IMPACT	RISK RATING-PROBABILITY
<b>Physical Risks</b>					
Disruptions due to heavy rainfall, flash floods and power outages	Singapore is susceptible to heavy rainfall and flash floods, which can damage public infrastructure, Data Centres and company properties. Climate-related disruptions such as power outages or flooding can lead to service and internet disruptions affecting business operations, client services, increased vulnerabilities in IT systems, leading to potential data loss and affecting web services.	<p>Locate office in buildings that are less prone to floods and where there are utility backups such as emergency power.</p> <p>For cloud services, obtain high availability zones that though are higher in costs, will provide resiliency against Data Centre site outages.</p> <p>Ensure service providers in the Supply Chain obtain cloud redundancy and backup as well for improved supply chain resiliency.</p>	Short term (1-3 years)	Medium	Low
<b>Transition Risks</b>					
<b>Policy &amp; Regulatory Changes</b>					
Rising energy costs	Energy costs are constantly increasing, and governments may implement stricter regulations on Data Centres' energy consumption that leads to even higher costs.	<p>Explore options to convert to fixed rate energy contracts, invest in smart cooling technology as well as adjust work arrangements to manage rising energy costs. Consider switching to LED lightings and implementing motion detectors for best energy usage.</p> <p>Evaluate direct renewable energy purchase for the office building.</p>	Short-Medium term (1-3 years)	Medium	Medium

		<p>Continue adoption of energy efficient technologies (such as low code development) and energy-efficient web development frameworks.</p> <p>Continue use of green hosting services and opensource tools such as co2.js to estimate the carbon emissions produced to move data over the internet in addition to use of spreadsheets to track and categorize purchased goods and services. The cloud infrastructure is continuously checked and improved using load balancing strategies to manage price hikes.</p>			
Rising waste and e-waste disposal costs	Subjected to new circular economy laws on waste and e-waste disposal.	<p>Implement a comprehensive waste management strategy and take part in Singapore's e-waste recycling programs.</p> <p>Re-use IT hardware and extend its life where practically possible.</p>	Short-Medium term (1-5 years)	Low	Low
Market Demand Shifts					
Market expectation shifts	Losing contracts to competitors with better ESG credentials, resulting in decreased customer trust and investor confidence	<p>Sustainable product development through use of AI for automatic code generation to reduce iterative coding tasks, green coding practices, etc.</p> <p>Offer data analysis and visualisation tools to help organisations understand and manage climate risks in their supply chain or web applications and turn to sustainable sourcing to enhance supply chain resilience, aligning with Singapore's sustainability goals.</p>	Medium – long term (5-10 years)	Medium	Medium

Technological Obsolescence					
Effort to move to newer generation tools shifts	Higher switching costs to newer generation energy-efficient software development tools	Capitalize on newer generation tools and software to generate service and support revenue (such as no code platforms and AI driven tools)	Medium – long term (5-10 years)	Medium	Medium
Higher R&D investments for AI	As AI tools become the norm, higher R&D investments need to be made to incorporate generative and agentic AI into solution and service offerings. Internal jobs could be displaced if staff is not reskilled with AI competencies.	Commence with choice of AI tools & providers, train internal staff and develop new solution and service offerings that are competitively priced.  Also to invest in more secure and compliant data handling practices to avoid potential data breaches.	Short-Medium term (1-5 years)	Medium	High

## PILLAR 2: SOCIAL – INVESTING IN OUR PEOPLE AND COMMUNITY

RISKS	BUSINESS IMPLICATIONS	RISK RESPONSE/MANAGEMENT AND OPPORTUNITIES	TIME SCALE	RISK RATING-IMPACT	RISK RATING-PROBABILITY
Labour Practices & Employee wellbeing	Disengaged workforce may create low morale and productivity in the company	Prioritising fair labour practices, employee wellbeing programmes and contributing to Singapore's focus on a healthy and engaged workforce.  Continue to look out for employee well-being and provide avenues to boost well-being.	Short-Medium term (1 – 5 years)	Medium	Medium
Diversity & Inclusion	Lack of diverse perspectives in making decisions if workforce does not come from diverse background.	Continue to foster a diverse workplace to align with Singapore's goal to building a harmonious and inclusive society.	Short-Medium term (1 – 5 years)	Medium	Medium

Community Engagement	Shifting consumers preferences: as climate change awareness grows, customers may demand more sustainable web solutions, pressuring companies to adopt eco-friendly practices	The company continues to find ways to develop more sustainable web solutions.	Short-Medium term (1 – 5 years)	Medium	Medium
Talent pool limitations	Climate gentrification limits access to skilled personnel in certain areas	<p>We continue to work on providing secure solutions to help remote work.</p> <p>Disaster preparedness - develop platforms for emergency communication and resource allocation during climate disasters is a work in progress. We continue to investigate opportunities to improve our processes.</p>	Medium-Long term (5 – 10 years)	Medium	Medium

### PILLAR 3: GOVERNANCE – TRANSPARENCY AND ACCOUNTABILITY

RISKS	BUSINESS IMPLICATIONS	RISK RESPONSE/MANAGEMENT AND OPPORTUNITIES	TIME SCALE	RISK RATING-IMPACT	RISK RATING-PROBABILITY
Supply Chain Resilience	Service disruption, delayed hardware delivery and data loss due to supply chain disruption arising from extreme climate events as well as pandemics.	We continue to use our green web hosting service, WebAble, for secure and regular backup. Avoid reliance on a single sole Service Provider. Prepare contingency plans for backup suppliers.	Short Term (1-3 years)	Medium	Medium
Operational Costs	Rising energy costs due to climate impacts / carbon tax, e.g., prolonged heatwaves.	In 2024, we continue to watch our energy consumption level, reducing where possible. Exploring to invest in energy-efficient technology and practices, monitoring energy consumption level, and exploring renewable sources and suppliers using renewable energy sources will continue in the years to come.	Short Term (1-3 years)	Medium	Medium

Regulatory Compliance	Evolving environmental regulations on power usage for Data Centres and technology standards.	Stay informed of regulatory developments, conduct compliance audits, adjust practices to align with standards and communicate regularly with regulators.	Medium – long term (5-10 years)	Medium	Medium
Reputation & Brand Risk	Reputational damage due to perceived inadequate efforts in reducing our carbon footprint or overconsumption of energy sources in providing web services.	Continue to engage stakeholders through publishing our sustainability report, taking part in sustainability reporting and sharing and mentoring sustainable web development practices in the community, non-profit organisations and industry associations	Short Term (1-3 years)	Medium	Medium
Security Breach	Data leak or loss due to employee negligence or malicious hacking.	Employee training on data security and finding suspicious activity. Technical controls like strong access controls, data encryption, and regular software updates. Incident response plans to effectively handle data breaches. Regular testing of security measures to find and address vulnerabilities.	Short Term (1-3 years)	High	Medium
Ethical Business Practices	Unethical business practices can lead to inaccurate or misleading reporting, which can result in penalties, reputational damage, and loss of investor confidence.	Upholding and promoting ethical business practices through robust governance frameworks, aligning with Singapore's reputation for business integrity.	Short Term (1-3 years)	Medium	Medium
Corporate Governance Structure	Lacking strong corporate governance impedes sustainable practices, risking greenwashing, stakeholder distrust, lost opportunities, and ultimately, diminished long-term value.	Maintaining Green Web Foundation certification, using renewable energy-powered AWS Data Centres for its WebAble hosting service. Practicing green coding for resource optimisation and to stay as a LowCarbonSG Partner, tracking carbon emissions and promoting hybrid work, reduced paper use, and office recycling.	Medium – long term (5-10 years)	Medium	Medium

Table 4: Key Risks and Opportunities by Pillar



# Risk Management

(GRI 201-2)

(IFRS S1 Risk management: 43, 44)

(IFRS S2 Risk management: 24-26)

Websparks, as a digital solutions provider, faces a diverse risk landscape. Our overall risk profile is shaped by key risks spanning cybersecurity, human resource security, regulatory compliance, operational continuity, supply chain dependencies, system acquisition, and physical and environmental security (including climate-related challenges). While we do not use scenario analysis in identifying sustainability and climate-related risks, we proactively address risks related to data security, evolving regulations, and technological disruptions by stakeholder engagement, exploring green partnerships, and collaborating with other industry partners to develop and implement sustainable solutions. Websparks' overall risk management process is a continuous cycle:

## 1. RISK IDENTIFICATION

Regular risk assessments show potential threats, including operational risks, cyber risks, regulatory changes, supply chain vulnerabilities, and climate-related challenges.

- **Data Collection and Analysis:** Analyse various data, including market trends and financial information (historical costs and projected revenue), to find and assess the potential fiscal impact of emerging climate-related risks and opportunities.
- **Risks are evaluated based on their nature, likelihood, and potential financial, operational, and reputational impact.** This assessment uses qualitative and quantitative measures for consistent evaluation. It prioritises climate-related risks alongside other business challenges, focusing on financial stability and profitability.



## 2. RISK ASSESSMENT & PRIORITISATION

A risk assessment matrix (likelihood vs. impact) is used to evaluate and prioritise all risks, including those related to sustainability (e.g., climate-related change), considering financial, operational, reputational, and environmental impacts. The matrix should be included as part of the risk assessment process. It serves as a tool to support the multi-criteria assessment, allowing stakeholders to see at once which risks are most critical enabling more informed decision-making on resource allocation and mitigation strategies.

IMPACT	LIKELIHOOD			
	HIGH	Close monitoring required	Requires monitoring and management	Intensive management
	MEDIUM	Risk may be accepted but requires monitoring	Management required	Management required
	LOW	Acceptable Risk	Risk acceptable, requires regulation	Managed

### 3. MITIGATION & RESPONSE

Websparks' risk mitigation strategy includes preventive controls (e.g., cybersecurity, disaster recovery, climate adaptation), response strategies (e.g., incident response procedures), and resilience-building measures (e.g., supply chain diversification, climate-resilient infrastructure). These are documented in a risk-treatment plan.

### 4. MONITORING & REVIEW:

Continuous monitoring through audits and stakeholder engagement allows for adaptation to new risks and regulatory changes.

- Risk assessments, methodologies, and mitigation plans should be regularly reviewed and updated to reflect changes in operations, finances, and the external environment.
- Processes are designed to detect emerging risks. This proactive monitoring allows adjustment of strategies promptly when new risks are identified, or as existing risks evolve.
- Changes to risk management processes, methodologies, and policies are documented and communicated transparently, including updates on financial impact assessments and mitigation strategies. This documentation supports sustainability-related financial disclosures, in line with IFRS requirements, and informs stakeholders about operational and financial aspects of risk management.

By implementing this detailed risk management process, Websparks not only meets the IFRS requirements for sustainability-related financial disclosures but also reinforces our commitment to proactively managing climate-related risks.

This structured approach ensures that our risk management practices are robust, transparent, and fully integrated into our overall business strategy, ultimately safeguarding our long-term operational and financial resilience.

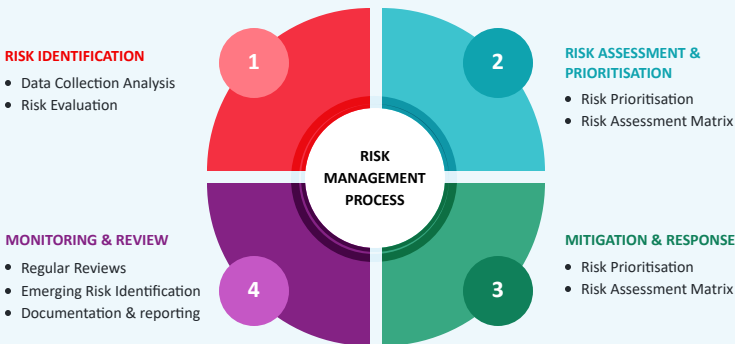


Figure 4: Risk Management Process

## PILLAR 1: ENVIRONMENTAL STEWARDSHIP

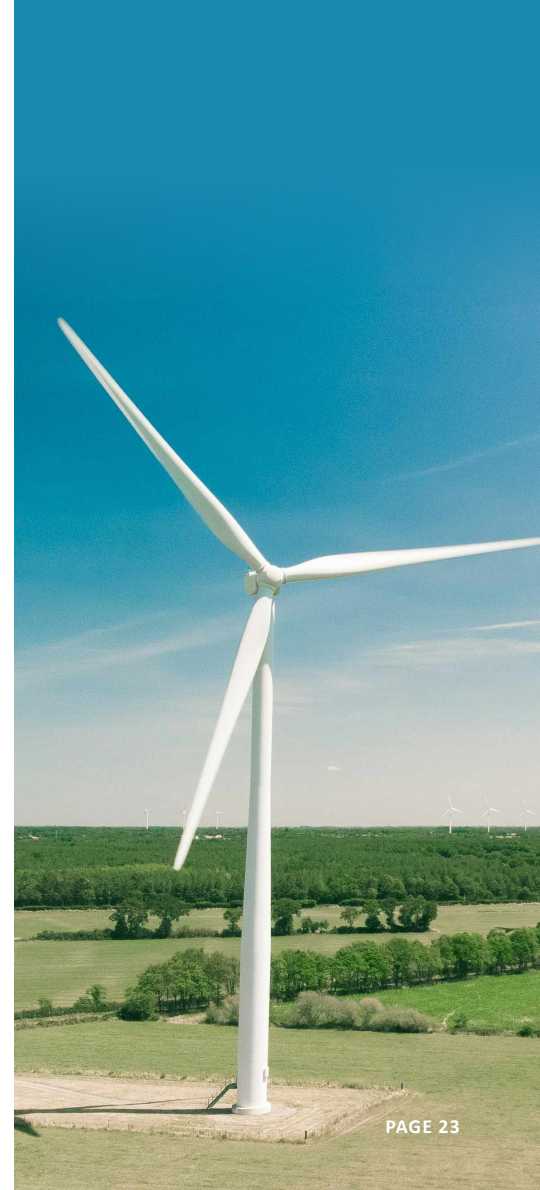
(IFRS S2 Risk management: 24-26)

Websparks is exposed to both climate-related physical risks as well as transition risks. Physical risks are the direct risks resulting from the physical impact of climate change, such as floods, severe storms, wildfires and extreme heat that could disrupt power grids, internet connectivity, Data Centre operations and general business operations. Transition risks are those arising from the process of transitioning to a low-carbon economy, such as government regulations, technology advancements and market dynamics.

For short term physical risks (1-3 years), we ensure that our office building is at an area less prone to floods and has sufficient emergency power back-ups for business continuity. We also procure high availability zones for cloud services to provide redundancy against provider's cloud Data Centre outages and hence provide better systems availabilities and uptime for customers. We work with up and down stream supply chain providers to ensure similar redundancies and resilience; and conduct regular backup of customers' systems for recovery contingencies.

The transition risks we face are multi-faceted and would require a multi-prong approach to be addressed. We expect the risks of energy costs, carbon taxes and costs-cum-compliance to circularity & waste management regulations to increase. To mitigate these risks, we will continue to use green hosting services and open-source tools such as CO2.js to track and reduce carbon emissions produced in its software solutions. We will monitor the cloud infrastructure and achieve optimisation of price points through load balancing strategies. We look to convert to fixed rate energy contracts to avoid sudden fluctuations in energy prices and use green technologies such as smart cooling, LED lightings, motion detectors and so forth to decarbonise our operations. We also continue the adoption of energy efficient software technologies such as low code development and energy-efficient web development tools to reduce energy consumption. We implemented a waste management strategy in 2024, and we take part in Singapore's e-waste recycling programs.

Clients are becoming more discerning on a company's ESG practices and may pivot to providers that have better ESG credentials. This is a medium to long term risk that we face, and we will strive to be a trusted sustainable software solutions provider that invests in sustainable product development using AI for automatic code generation and continual adoption of green coding practices. We aim to have the expertise to help clients in their own sustainability journeys with data driven insights on clients' websites. We will keep abreast of new software development tools, particularly No-Code tools, Generative AI and Agentic AI tools and incorporate them into innovative solutions and service offerings that are competitively priced to continue to be the technology leader in Singapore and the region. To achieve this, we will ensure continual training and upskilling for our staff in new tools, developmental practices, cybersecurity and data handling to avoid data breaches.



## PILLAR 2: SOCIAL – INVESTING IN OUR PEOPLE AND COMMUNITY

### Labour Practices and Employee Well-being

(GRI 401-2, 401-3, 403-6)

We acknowledge that labour practices and employee well-being are crucial to keeping a motivated and productive workforce. Disregarding these areas could lead to disengaged employees, resulting in low morale and reduced productivity. To mitigate this risk, we adhere to the Ministry of Manpower's (MOM) fair labour practices and have implemented employee well-being programs.

In 2024, Websparks focused on fostering a healthy and engaged workforce through several initiatives. Company-wide bonding sessions and events were conducted to strengthen team cohesion and employee engagement. Employee well-being, including mental health and work-life balance, is measured through annual staff reviews and feedback sessions. Employee turnover rates are tracked, and employee satisfaction is assessed through these feedback sessions. Websparks uses similar processes to those used for climate-related opportunities to find, assess, prioritise, and monitor sustainability-related opportunities.

### Diversity and Inclusion

(GRI 2-7, 405-1)

We also recognise the importance of a diverse and inclusive workforce, without which results in a lack of diverse opinions in decision making, hence the adherence to MOM's guidelines is closely followed and applied. Websparks promotes diversity and inclusion through equal hiring practices and fair wages. These efforts have been recognised by the Progressive Wage Mark Plus accreditation awarded which will help us to align to Singapore's commitment in building a harmonious and inclusive society.

### Talent Pool Limitations and Remote Work

Talent pool limitations, especially during climate gentrification, may restrict access to skilled personnel in certain areas. Websparks uses existing communication platforms like Microsoft Teams and company WhatsApp groups for communication during climate emergencies. To address the problems raised earlier, we will provide secure and reliable web solutions that ease remote work, reduce commuting emissions, and enhance disaster preparedness through the development of platforms for emergency communication and resource allocation to mitigate against any such risks.



To facilitate secure and reliable remote work and reduce commuting emissions, we provide employees with secure office laptops and manages software downloads through a Confluence page, requiring permission to be sought if more programs are required. Flexible work arrangements are also in place. Websparks' processes for finding, assessing, and monitoring sustainability-related risks and opportunities are like those for climate-related risks and opportunities, and aligned with the company's strategic goals.

## Community and Engagement

While specific tools or platforms for community engagement are not currently in use, Websparks engages with employees on sustainability issues by promoting practical actions like recycling. The impact of community engagement activities is tracked through records of activities, which are regularly reviewed. We monitor industry trends and news to track sustainability-related risks.

## PILLAR 3: GOVERNANCE – TRANSPARENCY AND ACCOUNTABILITY

### Operational Costs

(IFRS S1 30-31)

The financial risks associated with rising energy costs due to climate change are recognised and managed, as required by IFRS S1. Climate change can lead to both gradual and sudden energy price increases, affecting operational costs and profitability. The potential for significant price spikes due to climate-related events, such as prolonged heatwaves, is a key concern. Websparks employs a multi-faceted approach to mitigate the financial risks associated with energy price spikes:

- **Operational Optimisation:** Continuous monitoring and optimisation of cloud infrastructure, coupled with load balancing strategies, allow for efficient energy consumption even during periods of high demand and price volatility.
- **Contractual Arrangements:** Exploration of fixed-rate energy contracts provides price stability and predictability.
- **Technological Investments:** Investment in smart cooling technology reduces energy consumption and associated costs.
- **Workforce Flexibility:** Flexible working arrangements can be implemented to reduce energy usage during peak price periods.
- **Sustainable Practices:** Continued investment in and development of energy-efficient software development practices, exploration of renewable energy sources, and ongoing use of green hosting services contribute to long-term energy cost management and environmental sustainability.



## Regulatory Compliance

(IFRS S1 30-31)

With the evolving environmental regulations around sustainability such as Data Centres and use of green technology, Websparks will continue to actively track industry trends through participation in industry associations and bodies, staying informed of best practices and emerging technologies in energy management. This proactive approach helps us to predict and adapt to changes in the energy landscape.

## Reputation & Brand Risk

(IFRS S2 Industry based Guidance: Vol 58 Software & IT Services)

Websparks' approach to managing business continuity risks stemming from potential technology disruptions, as guided by IFRS S2 for the Software & IT Services sector. We understand the significant impact disruptions like cyberattacks, natural disasters, and technical failures can have on our operations and client service.

### SIGNIFICANT BUSINESS CONTINUITY RISKS

- **Cyberattacks:** Data breaches, ransomware, denial-of-service attacks, and other malicious cyber activity could compromise sensitive data, disrupt operations, and harm our reputation. This includes potential intellectual property and client data loss, leading to financial penalties and lost customer trust.
- **Technical Failures:** Websparks faces potential disruptions from various technical failures, including data loss, Active Directory (AD) server failures, cloud service downtime, hardware failures, and software bugs. These failures can disrupt communication with stakeholders, cause service interruptions and operational delays, and limit access to critical systems and data, affecting service delivery.

### ASSESSMENT AND PRIORITISATION

- Websparks assesses and prioritises risks based on three key factors: the likelihood of occurrence, the potential impact on operations, and the availability of mitigation strategies. Risks with a high likelihood and a significant potential impact are prioritised and included in the business continuity plan.
- **Likelihood:** Probability, determined through data analysis, industry trends, threat intelligence, and testing.
- **Impact:** Potential operational consequences (financial, service, reputational, legal, stakeholder), considering both immediate and cascading effects.
- **Mitigation:** Availability and effectiveness of controls (cost, feasibility, implementation).

### RECOVERY PROCESS

To ensure business continuity in case of a total Active Directory (AD) server failure, we have set up the following recovery process:

- **Immediate Response (within 4 hours):** Critical files are restored locally to enable continued work, and a damage assessment is performed to find the root cause. System failure notifications are sent to users via email and MS Teams within 30 minutes.
- **Server Replacement (2 weeks + 1 day):** A new server is to be gotten from the approved vendor list (2 weeks), and the latest server image is retrieved from off-site backup (1 day).
- **Restoration (1 day + 1 hour):** The server image is restored (or backups are used) onto the new server, including OS installation and system hardening (1 day). Connectivity is then tested (1 hour).
- **Data Recovery:** Critical data is recovered following the procedures documented in the ISMS document.



Websparks' approach to incident management and reputation management is multi-faceted. In the short term, a crisis communication protocol is activated for incidents such as cybersecurity breaches, service disruptions, or ethical lapses. All staff are expected to adhere to the ethical business practices detailed in the employee handbook. In the medium term, we will focus on communicating our company values and initiatives through the publication of annual sustainability reports, transparent disclosures on data security defences, and the cultivation of trust with stakeholders.

For the long term, Websparks is committed to becoming a leader in sustainable web development, which is reinforced through corporate responsibility initiatives and the maintenance of certifications such as Enabling Mark and LowCarbonSG to highlight commitment to sustainable and ethical practices.

Security Breach

(IFRS S2 Industry based Guidance: Vol 58)

Websparks experienced performance issues across its services, primarily due to WordPress plugin incompatibilities. The hosting service, WebAble, had minimal downtime during Q1 2024. Customer sites APCCA and SYFC experienced more significant outages. Mitigation involves system updates, proactive monitoring (e.g., AWS alerts), and rapid incident response. Clients are kept informed of disruptions and troubleshooting progress. Websparks uses Site24x7 for monitoring.

The security breach process is structured around time horizons: Short-term (1-3 years) emphasises immediate threat response (containment, updates, training, compliance). Medium-term (3-5 years) focuses on proactive defence (AI threat detection, penetration testing, audits, partnerships). Long-term (5-10+ years) prioritises futureproofing through advanced technologies (quantum encryption, cloud-native security, workforce development).



METRIC	DETAILS
Number of Performance Issues (per service type)	Hosting Service - WebAble (4 downtimes) Customer sites - APPCA (68 downtimes) and SYFC (20 downtimes)
Root Cause Analysis (Technical Failures, Programming Errors, Cyber-attacks, Natural Disasters)	Wordpress plug-in incompatibility
Mitigation Strategies	Regular system updates, proactive monitoring of AWS by monitoring alerts and swift incidence response.
Total Service Disruption Duration	Hosting Service - WebAble (4 min 46s) Customer sites - APPCA (4 days 14 min) and SYFC (2 hr 23 min) Total - 4 days 2hr 41min 46s
Customer Communication Effectiveness (Nature, Resolution Time, Mitigation)	Informed client of disruptions and keep clients updated on these issues

Table 5: Service Metrics

## Ethical Business Practices

(IFRS S1 30-31)

Websparks engages with stakeholders to uphold ethical business practices through several avenues. We support compliance with relevant regulations, such as the Personal Data Protection Act (PDPA), and take part in industry events. We collaborate with organisations like SGTech to promote ethical practices and technological advancements in Singapore's digital landscape. Our commitment is further enhanced by certifications such as, the Progressive Wage Mark Plus, Enabling Mark (Silver), and Green Web Foundation certification. Internally, we uphold strong policies on ethical conduct and offer confidential whistleblowing channels for employees.

- **Short-term:** Regularly review and update internal policies and processes related to sustainability, ethical business practices and data privacy to ensure they are current, effective, and aligned with strategic goals.
- **Medium-term:** Implement no-code platforms and AI-driven tools (in partnership with Decisions) to streamline key workflows, improve efficiency, and enhance decision-making, while keeping rigorous ethical oversight. Invest in more energy-efficient solutions and services across operations to reduce environmental impact and operating costs.
- **Long-term:** Actively collaborate with industry players to address shared challenges and drive collective progress on (mention specific areas, e.g., sustainability, ethical AI development). Enhance corporate social responsibility by deepening engagement with the community through initiatives like volunteer programs and partnerships with local organisations.

Websparks employs a multi-layered approach to managing ethical risks within its supply chain, recognising the complexities presented by varying regional standards. Our data collection strategy includes:

### CERTIFICATIONS

Prioritising internationally recognised certifications relevant to ethical sourcing, including ISO 27001 for information security related to sensitive ethical compliance data.

### COMPLIANCE REPORTS

Requiring regular supplier reports detailing adherence to local labour laws, environmental regulations, human rights standards, and Websparks' Code of Conduct.

### PUBLIC INFORMATION

Conducting due diligence using reputable sources to find potential ethical red flags.

### SUPPLIER PERFORMANCE REVIEWS

Integrating ethical criteria (fair wages, working hours, child labour, environmental impact, Code of Conduct adherence) into annual reviews, including feedback from Websparks' employees

## Corporate Governance Structure

(IFRS S1 43-44)

Websparks has integrated several sustainability practices into its business strategy, aligning with Singapore's Green Plan 2030.

These include renewable energy use for our Green Web Foundation-certified WebAble hosting, green coding, carbon emission reduction (via the LowCarbonSG partnership), and sustainable practices in the office.

Our company's risk governance structure distributes responsibility across teams. Management and team lead handle risks within their areas, the IT Security Team manages cybersecurity risks, the Sustainability Committee leads sustainability practices, and the Operations team oversees financial, procurement, and operational risks. Regular risk assessments, audits, and strategy reviews are conducted, and a risk-aware culture is fostered through training and external engagement.

Finally, Websparks is working towards fully integrating sustainability risks into our enterprise risk management framework. This integration spans the entire risk management process, treating sustainability risks like other key risks. Identification and assessment occur through regulatory monitoring, energy analysis, and benchmarking. Opportunities are pursued in green hosting and digital sustainability solutions. ESG performance and carbon footprint reduction are tracked via reporting, with oversight provided by executive and sustainability committees.

# Metrics and Targets

This section outlines our key metrics and targets, aligned with the IFRS Sustainability Disclosure Standards (S1 and S2), global standards, local regulations, as well as our organisational values to show our progress and commitment to environmental, social, and governance (ESG) goals. By setting clear, measurable goals, we aim to drive meaningful change, reduce our environmental footprint, and create long-term value for our stakeholders. These targets reflect our dedication to sustainability while supporting Singapore's vision for a greener, more resilient future.

## CLIMATE-RELATED METRICS AND TARGETS

(GRI 305-1, 305-2, 305-3, 305-4)  
(IFRS S2 27-29)

### a. Greenhouse Gas (GHG) Emission Metrics and Targets

Websparks acknowledges that our business operations contribute to climate change, and we have set up climate-related metrics and targets that follow the IFRS S2 Industry-Based Guidance. Our GHG emissions-related indicators are measured according to internationally recognised standards to ensure high quality monitoring and reporting. We use the following guidelines and tools to measure our GHG emissions:

- The Greenhouse Gas Protocol
- Carbon and Emissions Recording Tool (CERT) Tool - LowCarbonSG

In 2024, our total GHG emissions were approximately 25.3 metric tons of carbon dioxide equivalent (MtCO<sub>2</sub>e ) which represents our Scope 1, Scope 2 (location-based) and Scope 3 emissions.

### Scope 1: Direct Emissions

Comprising of direct emissions from owned and controlled sources, Websparks' Scope 1 emissions are mainly from diesel fuel consumption in transportation (company vehicles). We have reduced our Scope 1 emissions by 11.34% in 2024 due to a decrease in company vehicle usage from 896 litres in 2023 to 794 litres in 2024.

### Scope 2: Indirect Emissions from Purchased Electricity

The main source of our Scope 2 location-based emissions is purchased electricity from the national grid for our office. Our electricity consumption has fallen from 42,423 kWh in 2023 to 40,950 kWh in 2024, leading to a reduction of 3.49% in Scope 2 emissions.

### Scope 3: Other Indirect Emissions

Scope 3 emissions are indirect emissions (excluding Scope 2) that occur in Websparks' value chain. This includes emissions from potable water consumption, business travel and employee commuting. This year, we have included emissions from Amazon Web Services (AWS) cloud computing services (Scope 3 Category 1: Purchased Goods and Services) and waste generated from our operations (Scope 3 Category 5). By including these additional data, we can further understand and track our emissions sources, pinpoint areas needing improvement, and develop strategies and initiatives for emissions reductions moving forward.

In 2024, there is an increase in emissions from Business Travel and Employee Commuting compared to 2023 due to increased business activities locally and overseas, as well as a higher number of employees returning to office to work.

2024 KEY METRICS	UNIT OF MEASURE	2023 (Baseline Year)	2024	2025 TARGET	2026 TARGET
<b>Scope 1:</b> Gross direct GHG Emission	MtCO2e	2.380	2.110 ↓	2.068	2.026
<b>Scope 2:</b> Indirect GHG emissions from energy purchased and consumed (Location-based)	MtCO2e	17.210	16.610 ↓	16.362	16.117
<b>Scope 3:</b> Other indirect GHG emissions	MtCO2e	2.061	6.566 ↑	6.467 (baseline year changed to Yr2024)	6.370 (baseline year changed to Yr2024)
<b>Scope 3 Category 1:</b> Purchased Goods and Services (Potable water consumption)	MtCO2e	0.117	0.110 ↓	0.108	0.107
<b>Scope 3 Category 1:</b> Purchased Goods and Services (Amazon Web Services)@ <sup>1</sup>	MtCO2e	N/A	0.0516	0.051	0.050
<b>Scope 3 Category 5:</b> Waste generated in operations@ <sup>2</sup>	MtCO2e	N/A	0.114	0.112	0.111
<b>Scope 3 Category 6:</b> Business Travel@ <sup>3</sup>	MtCO2e	0.443	2.710 ↑	2.669 (baseline year changed to Yr2024)	2.629 (baseline year changed to Yr2024)
<b>Scope 3 Category 7:</b> Employee Commuting@ <sup>4</sup>	MtCO2e	1.501	3.580 ↑	3.526 (baseline year changed to Yr2024)	3.473 (baseline year changed to Yr2024)
<b>Total GHG emission (Scope 1 to 3)</b>	<b>MtCO2e</b>	<b>21.651</b>	<b>25.286 ↑</b>	<b>24.897</b>	<b>24.513</b>

Table 6: GHG Emission Metrics and Targets of Direct (Scope 1), Indirect (Scope 2) and Other Indirect (Scope 3)

@1 Inclusion of AWS Cloud services consumption

@2 Tracking of general waste generated started in 2024

@3 Post COVID, more business travels were made

@4 Post COVID, more employees return to office to work

Intensity Ratio

We use Intensity Ratio as an efficiency measure of our resource and environmental impact (emissions) relative to the number of employees.

METRIC	UNIT OF MEASURE	2023 (Baseline Year)	2024	2025 TARGET	2026 TARGET
No. of employees	Per person	90	85	N/A	N/A
GHG emissions intensity ratio	MtCO2e per employee	0.241	0.297	0.293	0.289

Table 7: GHG emissions intensity ratio

The GHG emission intensity ratio for the current year shows an increase from the prior year’s GHG emission intensity. The increase in GHG emissions in 2024 is due to:

I. Reduction in employee headcount in 2024 (from 90 to 85)

II. The new addition of GHG emission values from Purchased Goods and Services (Scope 3 Category 1)

(GRI 305-3)

This accounts for indirect emissions from our value chain, specifically (Amazon Web Services) AWS cloud usage. While AWS is energyefficient and increasingly powered by renewable energy, its global scale and growing cloud adoption mean that emissions continue to rise. Therefore, we are refining our cloud resource use for both cost and environmental reasons, exploring footprint reduction strategies and advocating for industry-wide sustainable cloud practices.

III. The new addition of GHG emission values from Waste Generated in Operations (Scope 3 Category 5)

(GRI 306-3)

Operational waste, including e-waste, paper, and packaging, is now included in our reported emissions. Recognising its environmental impact, we are committed to waste reduction through recycling, minimising single-use items, and responsible waste management to maximise equipment lifespan and minimise e-waste.

IV. Increased Business Travel from growing business activities (Scope 3 Category 6)

(GRI 305-3)

Increased 2024 GHG emissions are primarily due to greater business activity requiring more travel. Due to this, we need to re-baseline our targets for Yr 2025 and Yr 2026 to the new baseline year Yr 2024. We will mitigate this by increasing virtual meetings, prioritising ecofriendly travel (e.g., economy class, direct flights), and utilising carbon offset programs.

V. Increased Employee Commuting as more employees are returning to the office (Scope 3 Category 7)

(GRI 305-3)

This increase reflects the post-pandemic shift to hybrid work, balancing remote work with in-person collaboration. Due to this, we need to re-baseline our targets for Yr 2025 and Yr 2026 to the new baseline year Yr 2024. We are mitigating related emissions by encouraging sustainable commuting practices, optimising work schedules to reduce peak-hour travel, and keeping flexible work arrangements.

b. Other Climate-Related Metrics and Targets

(GRI 302-1)

Energy

At Websparks, we are dedicated to cutting emissions and moving toward a low-carbon future. By boosting energy efficiency and exploring a transition to the use of renewables, we are not only reducing our environmental impact but also addressing risks like shifting regulations, meeting stakeholder demands and adapting to changing customer preferences. At the same time, this approach opens opportunities for us to grow our renewable energy use and invest in energy-efficient technologies, keeping us competitive and forward-thinking in a rapidly evolving market.

METRIC	UNIT OF MEASURE	2023 (Baseline Year)	2024	2025 TARGET	2026 TARGET
Total electricity consumption (100% grid electricity)	kWh	42,423	40,950	40,301	39,696

Table 8: Energy-Related Metrics & Targets

Water

Though our operations have a relatively low water footprint compared to other industries, we recognise that even small amounts of water usage contribute to global water scarcity challenges, and we are committed to responsible water stewardship. In line with Singapore’s focus on sustainable water management and our own sustainability goals, we aim to minimise water consumption, improve efficiency, and support water conservation efforts. This section outlines our targets and metrics, showing our proactive approach to managing water resources responsibly and contributing to a more sustainable future.

METRIC	UNIT OF MEASURE	2023 (Baseline Year)	2024	2025 TARGET	2026 TARGET
Total water consumption	litres	90,000	84,615	83,346	82,096

Table 9: Water-Related Metrics & Targets

Note: Emissions factor of Potable Water is 1.3 kgCO2/m³



NON-CLIMATE-RELATED SUSTAINABILITY METRICS AND TARGETS

a. Social Metrics and Targets

(IFRS S1 Metrics and targets: 45-46)

The key metrics and targets that we monitor and report on are workforce diversity, employee well-being, social responsibility and community engagement. We assess how talent retention, workforce equity and employee satisfaction influence business outcomes. We also consider climate-related social risks, such as work force adaptation to sustainable skills, employee resilience to climate-related disruptions and fair transition policies to formulate our responses to such threats. By setting clear, measurable goals and integrating them into our ESG and business goals, we aim to drive continuous improvement and contribute to Websparks’ long-term success, financial resilience and stakeholder value.

Talent attraction and retention

(GRI 401-1, 401-3)

We build a diverse team by attracting top talent through competitive salaries and fair recruitment practices. We comply to the Ministry of Manpower’s anti-discrimination laws and offer support to employees facing bias, ensuring equal opportunity for everyone. During the reporting period, our new employee hires include 2 new hires above 50 years old which adds diversity to our workforce. The numbers are as follows:

BY GENDER	MALE	FEMALE	TOTAL
New employee hires	4	3	7

Table 10: Number of New Employees Hired by Gender - 2024

BY AGE	UNDER 30 YEARS OLD	30-50 YEARS OLD	OVER 50 YEARS OLD	TOTAL
New employee hires	2	3	2	7

Table 11: Number of New Employees Hired by Age – 2024

Employees are entitled to parental leave. In 2025 the number of staff that took parental leave remains at 5, with 2 males and 3 female employees. All employees returned to work after their parental leave ended resulting in a return-to-work rate of 100% for both genders.

BY GENDER	PATERNITY	MATERNITY
Return-to-work Ratio	100%	100%

Table 12: Parental Leave Return-to-Work Ratio – 2024

BY GENDER	PATERNITY	MATERNITY
Return-to-work Ratio	2	3

Table 13: Number of Employees on Parental Leave Who Return-to-Work - 2024

## Training and Education

(GRI 404-1, 404-2, 404-3)

At Websparks, we foster a culture of continuous learning for our employees. This includes comprehensive training (certifications, diversity & inclusion), a dedicated training fund for external courses, and regular performance reviews for career development. Our commitment ensures a skilled and adaptable workforce in the ever-changing IT industry.

Our key upskilling policies include:

- 1. Structured Onboarding:** Onboarding programs for new hires where they will be introduced to the company in terms of the role they will be playing and the relevant training to be undertaken subsequently.
- 2. Brown Bag Sharing Sessions:** We foster knowledge sharing through monthly "Brown Bag" sessions where employees or guest speakers present their knowledge to the team, either online or in-person.
- 3. Information security compliance training:** All employees receive annual training on relevant data handling, privacy and regulatory requirements.
- 4. Self-help training:** Every employee is provided access to online learning resources via third-party training providers.



METRIC	UNIT OF MEASURE	2023 (Baseline Year)	2024	2025 TARGET	2026 TARGET
Training and education	Average hours per year per employee	31	35.2	40	45
Performance and career development review	Percentage of recipients	100%	100%	100%	100%

There was an increase in average training hours from 2023 to 2024. This reflected our commitment to developing our staff and showed that the company is on track to achieve our 2025 target as reflected in the 2023 Sustainability Report.

Table 14: Training and Performance-related Metrics & Targets

Diversity and Equal Opportunity

(GRI 2-7, 405-1)

As an organisation, we believe in an inclusive environment and the importance of a diverse workplace, as it allows us to engage with various ideas and opinions and build on the strengths of our different employees. The policy commitments are communicated through signed employment handbooks and signed project contracts with business partners and other stakeholders.

Some of our diversity and equal opportunity policies are as follows:

- 1. **Recruitment and Hiring Policies:** Commitment to implementing fair and unbiased recruitment and hiring processes that consider candidates based on their qualifications, skills, and experiences, regardless of demographic factors. We adhere to MOM's antidiscrimination laws and regulations in all recruitment activities to ensure equal access to employment opportunities for individuals from diverse backgrounds.
- 2. **Equal Pay and Opportunity:** We ensure pay equity across gender, race, ethnicity, age, and other demographic factors to cut disparities in compensation for employees performing similar roles. We offer equal opportunities for career advancement, professional development, and training programs to all employees, irrespective of their background. Our management team consist of both male and female.
- 3. **Supplier and Partner Standards:** We incorporate diversity and equal opportunity criteria into supplier choice and evaluation processes, including contractual agreements and performance assessments.
- 4. **Reporting and Accountability:** Regular reviews and audits of HR policies and practices to ensure alignment with diversity and equal opportunity policies.



For FY2024, we have a total of 85 employees in our Singapore office, a diverse mix of people from different age groups and genders as shown:

BY GENDER	MALE	FEMALE
Percentage of individuals within the organisation's governance bodies	65.63%	34.37%

Table 15: Percentage of individuals within the organisation’s governance bodies by gender

BY AGE GROUP	20-30 YEARS OLD	30-40 YEARS OLD	40- 50 YEARS OLD	OVER 50 YEARS OLD
Percentage of individuals within the organisation’s governance bodies	3.13%	65.63%	28.12%	3.12%

Table 16: Percentage of individuals within the organisation’s governance bodies by age group

BY GENDER	MALE	FEMALE
Percentage of Employees	70.59%	29.41%

Table 17: Percentage of Employees by Gender

BY AGE GROUP	BELOW 30 YEARS OLD	30-40 YEARS OLD	40- 50 YEARS OLD	OVER 50 YEARS OLD
Percentage of Employees	21.18%	56.47%	18.82%	3.53%

Table 18: Percentage of employees by age group

RACE	CHINESE	MALAY	INDIAN	OTHER RACES
Percentage of Employees	75.29%	10.59%	3.53%	10.59%

Table 19: Employee Racial Composition

METRIC	UNIT OF MEASURE	2023 (Baseline Year)	2024	2025 TARGET	2026 TARGET
Gender Diversity	Gender Ratio (male to female employees)	71:29	71:29	70:30	70:30
Age Diversity	Age Ratio (under 30 years old: over 30 years old)	25:75	21:79	25:75	25:75

Table 20: Diversity-related Metrics & Targets

b. Governance Metrics and Targets

(GRI 418-1)

In an era where data privacy and corporate integrity are paramount, Websparks has implemented robust policies, advanced cybersecurity measures, and comprehensive employee training programs to prevent incidents like data-breach and corruption in our operations. By striving for zero occurrences, we aim to not only protect our customers and stakeholders but also reinforce our reputation as a responsible and trustworthy IT partner in Singapore’s dynamic digital landscape. This commitment underscores our proactive approach to risk management and our resolve to work with transparency, accountability and integrity.



METRIC	UNIT OF MEASURE	2023 (Baseline Year)	2024	2025 TARGET	2026 TARGET
Named leaks, thefts, loss of customer data and data-breach related incidents	Number of occurrences per year	0	0	0	0
Corruption and Bribery related incidents	Number of occurrences per year	0	0	0	0
Complaints related to breach of customer privacy, received from outside parties and substantiated by the organisation	Number of occurrences per year	0	0	0	0
Planned or unplanned downtime of cloud-based services caused by events such as technical failures, programming errors, cyber-attacks, weather events, or natural disasters	Number of performance issues	Not tracked	92	90	88
	Number of service disruptions	Not tracked	92	90	88
Service disruption affected by software and IT service licenses, with the licensing basis and type specified	Total customer downtime (hours) related to performance issues and service disruptions	Not tracked	98	96	94

Table 21: Governance-Related Metrics & Targets

# Appendix A: GRI Content Index

## Statement of Use

Websparks Pte Ltd has reported the information cited in this GRI content index for the period 01 January 2024 to 31 December 2024 with reference to the GRI Standards.

GRI 1 used

GRI 1: Foundation 2021

GRI STANDARD	DISCLOSURE		LOCATION
	2-1	Organisational details	3
	2-2	Entities included in the organisation's sustainability reporting	3
	2-3	Reporting period, frequency and contact point	5
	2-5	External Assurance	5
	2-6	Activities, value chain and other business relationships	3
	2-7	Employees	27, 35
	2-9	Governance structure and composition	8
	2-12	Role of the highest governance body in overseeing the management of impacts	8
	2-13	Delegation of responsibility for managing impacts	8
	2-14	Role of the highest governance body in sustainability reporting	8
	2-22	Statement on sustainable development strategy	4, 6
	2-26	Mechanisms for seeking advice and raising concerns	15
	2-28	Membership Associations	3
	2-29	Approach to stakeholder engagement	10

GRI STANDARD	DISCLOSURE		LOCATION
GRI 3: Standard Requirements Disclosure	3-1	Process to determine material topics	12
	3-2	List of material topics	12
	3-3	Management of material topics	12, 13, 14, 15
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	14
	201-2	Financial implications and other risks and opportunities due to climate change	21
GRI 205: Anti-corruption 2016	205-1	Operations assessed for risks related to corruption	15
	205-2	Communication and training about anti-corruption policies and procedures	15
GRI 302: Energy 2016	302-1	Energy consumption within the organisation	32
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	29
	305-2	Energy indirect (Scope 2) GHG emissions	29
	305-3	Other indirect (Scope 3) GHG emissions	29, 31
	305-4	GHG emissions intensity	29
	306-3	Waste generated	31



GRI STANDARD	DISCLOSURE		LOCATION
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	33, 34
	401-2	Benefits provided to full time employees that are not provided to temporary or part-time employees	24
	401-3	Parental leave	24, 33
GRI 403: Occupational Health and Safety 2018	403-6	Promotion of worker health	24
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	34
	404-2	Programs for upgrading employee skills and transition assistance programs	34
	404-3	Percentage of employees receiving regular performance and career development reviews	34
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	24
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	15, 37

# Appendix B: IFRS Content Index

## Statement of Use

Websparks Pte Ltd has reported the information cited in this IFRS content index for the period 01 January 2024 to 31 December 2024 with reference to the IFRS S1 and S2 Standards.

IFRS S1	RECOMMENDED DISCLOSURES		LOCATION
	Sustainability-related risks and opportunities		
	30a	describe sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects;	12, 25, 26, 28
	30b	specify the time horizons—short, medium or long term—over which the effects of each of those sustainability-related risks and opportunities could reasonably be expected to occur; and	12, 25, 26, 28
	30c	explain how the entity defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the entity for strategic decisionmaking.	12, 25, 26, 28
	31	Short-, medium- and long- term time horizons can vary between entities and depend on many factors, including industry-specific characteristics, such as cash flow, investment and business cycles, the planning horizons typically used in an entity's industry for strategic decision-making and capital allocation plans, and the time horizons over which users of general-purpose financial reports conduct their assessments of entities in that industry.	12, 25, 26, 28
	Risk Management		
	43a	The objective of sustainability-related financial disclosures on risk management is to enable users of general-purpose financial reports: to understand an entity's processes to identify, assess, prioritise and monitor sustainability-related risks and opportunities, including whether and how those processes are integrated into and inform the entity's overall risk management process; and	21, 28
	43b	to assess the entity's overall risk profile and its overall risk management process.	21, 28

IFRS S1	RECOMMENDED DISCLOSURES		LOCATION
	44	To achieve this objective, an entity shall disclose information about:	21, 28
	44a	(i) the inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes); (ii) whether and how the entity uses scenario analysis to inform its identification of sustainability-related risks; (iii) how the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria); (iv) whether and how the entity prioritises sustainability-related risks relative to other types of risk; (v) how the entity monitors sustainability-related risks; and (vi) whether and how the entity has changed the processes it uses compared with the previous reporting period;	21, 28
	44b	the processes the entity uses to identify, assess, prioritise and monitor sustainability-related opportunities; and	21, 28
	44c	the extent to which, and how, the processes for identifying, assessing, prioritising and monitoring sustainability-related risks and opportunities are integrated into and inform the entity's overall risk management process.	21, 28
	Metrics and targets		
	45	The objective of sustainability-related financial disclosures on metrics and targets is to enable users of general-purpose financial reports to understand an entity's performance in relation to its sustainability-related risks and opportunities, including progress towards any targets the entity has set, and any targets it is required to meet by law or regulation.	33, 34, 35, 36, 37
	46a	An entity shall disclose, for each sustainability-related risk and opportunity that could reasonably be expected to affect the entity's prospects: metrics required by an applicable IFRS Sustainability Disclosure Standard; and	33, 34, 35, 36, 37
	46b	metrics the entity uses to measure and monitor: (i) that sustainability-related risk or opportunity; and (ii) its performance in relation to that sustainability-related risk or opportunity, including progress towards any targets the entity has set, and any targets it is required to meet by law or regulation.	33, 34, 35, 36, 37

IFRS S2	RECOMMENDED DISCLOSURES		LOCATION
	Climate-related risks and opportunities		
	10a	describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects;	12
	10b	explain, for each climate-related risk the entity has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk;	12
	10c	specify, for each climate-related risk and opportunity the entity has identified, over which time horizons— short, medium or long term— the effects of each climate-related risk and opportunity could reasonably be expected to occur; and	12
	10d	explain how the entity defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the entity for strategic decisionmaking.	12
	11	In identifying the climate-related risks and opportunities that could reasonably be expected to affect an entity's prospects, the entity shall use all reasonable and supportable information that is available to the entity at the reporting date without undue cost or effort, including information about past events, current conditions and forecasts of future conditions.	12
	12	In identifying the climate-related risks and opportunities that could reasonably be expected to affect an entity's prospects, the entity shall refer to and consider the applicability of the industry-based disclosure topics defined in the industry-based Guidance on Implementing IFRS S2.	12
	Risk Management		
	24	The objective of climate-related financial disclosures on risk management is to enable users of general-purpose financial reports to understand an entity's processes to identify, assess, prioritise and monitor climate-related risks and opportunities, including whether and how those processes are integrated into and inform the entity's overall risk management process.	21, 23

IFRS S2	RECOMMENDED DISCLOSURES	LOCATION
	<p>25a To achieve this objective, an entity shall disclose information about: the processes and related policies the entity uses to identify, assess, prioritise and monitor climate-related risks, including information about the inputs and parameters the entity uses (for example,</p> <ul style="list-style-type: none"> <li>(i) information about data sources and the scope of operations covered in the processes;</li> <li>(ii) whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related risks;</li> <li>(iii) how the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria);</li> <li>(iv) whether and how the entity prioritises climate-related risks relative to other types of risk; (v) how the entity monitors climate-related risks; and</li> <li>(vi) whether and how the entity has changed the processes it uses compared with the previous reporting period;</li> </ul>	21, 23
	<p>25b the processes the entity uses to identify, assess, prioritise and monitor climate-related opportunities, including information about whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related opportunities; and</p>	21, 23
	<p>25c the extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the entity's overall risk management process.</p>	21, 23
	<p>26 In preparing disclosures to fulfil the requirements in paragraph 25, an entity shall avoid unnecessary duplication in accordance with IFRS S1 (see paragraph B42(b) of IFRS S1). For example, although an entity shall provide the information required by paragraph 25, if oversight of sustainability related risks and opportunities are managed on an integrated basis, the entity would avoid duplication by providing integrated risk management disclosures instead of separate disclosures for each sustainability-related risk and opportunity.</p>	21, 23
	Metrics and targets	
	<p>27 The objective of climate-related financial disclosures on metrics and targets is to enable users of general-purpose financial reports to understand an entity's performance in relation to its climate-related risks and opportunities, including progress towards any climate-related targets it has set, and any targets it is required to meet by law or regulation.</p>	29, 30, 31, 32

IFRS S2	RECOMMENDED DISCLOSURES		LOCATION
	28a	To achieve this objective, an entity shall disclose: (a) information relevant to the cross-industry metric categories (see paragraphs 29–31);	29, 30, 31, 32
	28b	industry-based metrics that are associated with particular business models, activities or other common features that characterise participation in an industry (see paragraph 32); and	29, 30, 31, 32
	28c	targets set by the entity, and any targets it is required to meet by law or regulation, to mitigate or adapt to climate-related risks or take advantage of climate-related opportunities, including metrics used by the governance body or management to measure progress towards these targets (see paragraphs 33–37).	29, 30, 31, 32
	Climate-related metrics		
	29a i	Disclose its absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tonnes of CO2 equivalent (see paragraphs B19–B22), classified as: (1) Scope 1 greenhouse gas emissions; (2) Scope 2 greenhouse gas emissions; and (3) Scope 3 greenhouse gas emissions;	29, 30
	29a ii	measure its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless required by a jurisdictional authority or an exchange on which the entity is listed to use a different method for measuring its greenhouse gas emissions	29, 30
	29a v	for Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(2), disclose its location-based Scope 2 greenhouse gas emissions, and provide information about any contractual instruments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse gas emissions (see paragraphs B30–B31); and	29, 30
	29a vi	for Scope 3 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(3), and with reference to paragraphs B32–B57, disclose: (1) the categories included within the entity's measure of Scope 3 greenhouse gas emissions, in accordance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011);	29, 30
		IFRS S2 Industry based guidance: Vol 58 Software and IT Services	26, 27



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