SUSTAINABILITY REPORT 2020

BUILDING FOR A Better Future





Company Growth & Achievements Highlights





- Revenue from sale of development properties: S\$742.4 million
- Rental & Related Income: S\$113.4 million
- Revenue from hotel and golf operations: S\$11.8 million
- Revenue from service concession arrangements: S\$11.3 million
- Others: S\$31.6 million



- Sinar Mas Land Plaza BSD City
- MyRepublic Plaza BSD City
- Green Office Park 9 BSD City
- Green Office Park 1 BSD City
- Sinar Mas Land Plaza Jakarta

Scope



2,747,652 m² total GFA in 2020 ↑ 6% increase from 2019¹



The Edge Singapore Centurion Club 2020

- Sinarmas Land Limited Winner of Company of the Year (Real Estate Sector)
- Sinarmas Land Limited Winner of Growth in Profit After Tax over Three Years (Real Estate Sector)
- Sinarmas Land Limited Winner of Highest Profit After Tax Growth (Real Estate Sector)

BCI Asia Award 2020

• Sinar Mas Land Top 10 Developers 2020 Indonesia

Property Guru Indonesia Property Award 2020

- Sinar Mas Land Best Developer Award 2020
- Sinar Mas Land Best Millennial Housing Development Imajihaus at Greenwich Park (BSD City)
- Sinar Mas Land Best Housing Development Caelus at Greenwich Park (BSD City)
- Sinar Mas Land Best High-End Housing Development Caelus at Greenwich Park (BSD City)

Property Guru Asia Property Awards 2020

- Sinar Mas Land
 Best Developer Award 2020 (Indonesia)
- Sinar Mas Land Best Housing Development (Indonesia) Caelus at Greenwich Park by BSD City

FIABCI Indonesia REI Excellence Awards 2020

• Sinar Mas Land Gold Winner for Green Office Park 1 Building Office Building category

Based on revised GFA figure (due to changes in calculation methodology) for 2019

Governance Highlights



- market communications and product information
 height and activity imports of BCDE's product.
- health and safety impacts of BSDE's product and services
- all relevant social and economic laws and regulations
- all relevant environmental laws and regulations

reported cases of corruption

significant fines/non-monetary sanctions imposed on company





No variation in level of minimum wage

between male and female employees



Health and Safety Highlights

of work-related injuries under the Asset Management, Commercial and Retail Hospitality Group

Customer and Public Health Safety

- Number of injuries to members of the public:

 decrease

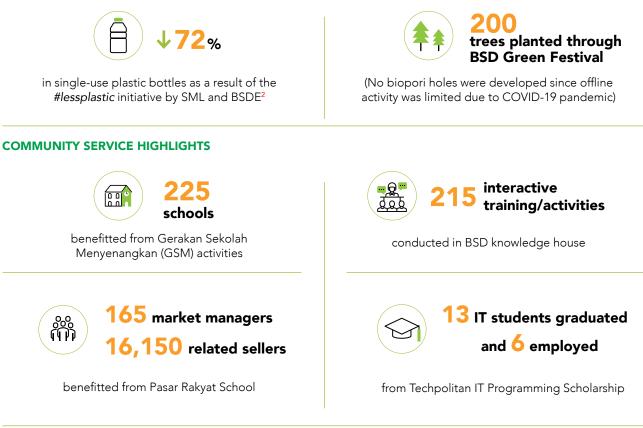
 from 8 in 2019 to 6 in 2020
- Number of dangerous occurrences:

 decrease

 from 35 in 2019 to 30 in 2020

Community and HR Environmental Initiatives

HR ENVIRONMENTAL INITIATIVES



² This decrease can also be attributed to fewer in-person meetings and events due to COVID-19 restrictions

ENVIRONMENT SERVICE HIGHLIGHTS

Energy

190,864,429 kWh

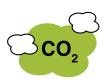
Total Energy Consumption ↓ 24% decrease from 2019

8,510,789 kWh Green Building Energy Consumption ↑ 5% increase from 2019 **114.46 kWh/m²** Overall Energy Intensity by GFA Occupied

↓ 13% decrease from 2019

103.00 kWh/m² Green Building Energy Intensity by GFA Occupied ↑ 7% increase from 2019

GHG Emission



137,740 tonnes CO₂e Total GHG Emissions

↓ 24% decrease from 2019

6,133 tonnes CO₂e Green Building GHG Emissions ↑ 6% increase from 2019 0.083 tonnes CO₂e/m² Overall GHG Emissions Intensity by GFA Occupied ↓ 13% decrease from 2019

0.074 tonnes CO₂e/m² Green Building GHG Emissions Intensity by GFA Occupied ↑ 7% increase from 2019

Water



90,205 m³

Green Building Municipal Water Consumption

1.07 m³/m² Overall Municipal Water Intensity by GFA Occupied ³ ↓ 15% decrease from 2019

1.09 m³/m² Green Building Municipal Water Intensity by GFA Occupied ↓ 0.4% decrease from 2019

Recycle & Reused Water



526,401 m³ Recycle & Reused Water ↓ 3% decrease from 2019

10% Total Water Consumption **54% decrease from 2019** **13.2 mg/l** Average of BOD Effluents ↓ **16% decrease from 2019**

> 3 2020 total municipal water consumption figure includes data on Kota Deltamas, an integrated township development. Since there is no data on GFA Occupied, the water intensity by GFA is excluded from the computation figure

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Abbreviations

Abbreviations	Explanations	
AM	Asset Management	
ARC	Audit and Risk Management Committee	
ВСА	Building and Construction Authority of Singapore	
СМС	Crisis Management Committee	
Comm	Commercial	
ERMC	Executive Risk Management Committee	
ESG	Environmental, Social and Corporate Governance	
GFA	Gross Floor Area	
GHG	Greenhouse Gas	
GOP	Green Office Park	
GRI	Global Reporting Initiative	
GSM	Gerakan Sekolah Menyenangkan (Fun School Movement)	
HSE	Health, Safety, Environment	
ITC	International Trade Centre	
Jabodetabek or JBDTK	The Greater Jakarta metropolitan area (an acronym of Jakarta-Bogor-De- pok-Tangerang-Bekasi)	
IDX	Indonesia Stock Exchange	
LEED	Leadership in Energy and Environmental Design	
MSMEs	Micro, Small and Medium Enterprises	
ОНЅ	Occupational Health Safety	
PIC	Person-in-Charge	
RH	Retail and Hospitality	
RTH	Ruang Terbuka Hijau (Green Open Space)	
Rumah Pintar	Knowledge House	
SBU	Strategic Business Unit	
SDGs	United Nation's Sustainable Development Goals	
SGX	Singapore Exchange Limited	
UNGC	United Nations Global Compact	
WFH	Work-from-Home	

ABOUT Sinarmas Land

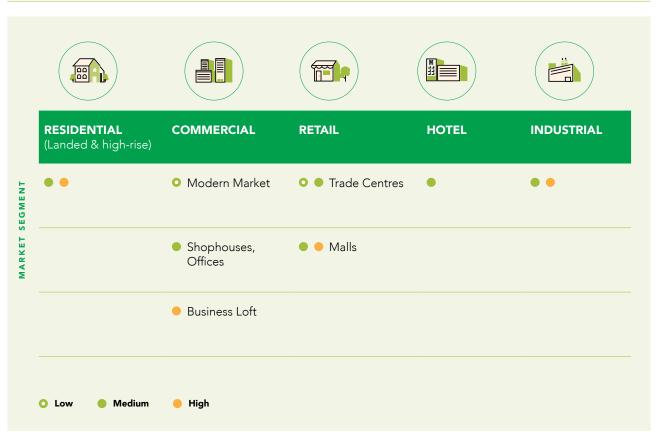
Listed on the Singapore Exchange and headquartered in Singapore, Sinarmas Land Limited ("SML") is engaged in the property business through its developments and investments in Indonesia, Malaysia, China, Australia and the United Kingdom.

In Indonesia, SML is one of the largest property development companies by land bank and market capitalisation. SML operates mainly through three public listed Indonesia subsidiaries, namely PT Bumi Serpong Damai Tbk ("BSDE"), PT Duta Pertiwi Tbk ("DUTI") and PT Puradelta Lestari Tbk ("DMAS") – with a combined market capitalisation in excess of S\$5.1 billion as at 31 December 2020. In addition, BSDE is the largest shareholder of Dana Investasi Real Estat Simas Plaza Indonesia ("DIRE"), the biggest listed Real Estate Investment Trust ("REIT") on the Indonesia Stock Exchange, following the restructuring of our listed associated company, PT Plaza Indonesia Realty Tbk ("PLIN"), in 2019. The Indonesia division is engaged in all sub-sectors of the property business, including township development, residential, commercial, industrial and hospitality-related properties.

Our most material development is BSDE's flagship development, BSD City. It is one of the largest

privately developed townships in Indonesia with development rights to approximately 5,950 hectares of land. It comprises residential estates and commercial sub-town centres that include commercial and industrial facilities, schools, hospitals, parks and other amenities. Located in Tangerang Regency, approximately 25km to the southwest of Jakarta, BSD City is well-connected to Jakarta and other parts of Greater Jakarta by toll roads and railways. BSDE disclosures make up a large portion of this report.

For more information, please refer to SML's Annual Report 2020.



SINARMAS LAND LIMITED'S PROPERTY BY MARKET SEGMENTS

NETWORK OF OPERATIONS

Portfolio Overview



CHAIRMAN AND CEO Statement



Dear Valued Stakeholders,

In 2020, the business world was caught off-guard by the level of upheaval and disruption the COVID-19 health crisis brought. As repercussions from the pandemic continue to unfold, they serve as a reminder to always expect the unexpected. Sinarmas Land Limited ("SML" or "the Company") and its subsidiaries (collectively "the Group"), along with the rest of the business communities, found ourselves needing to reassess our plans and priorities as the impacts of COVID-19 were unveiled.

Like many other industries, the real estate industry was negatively impacted in multiple different ways. Substantial changes were made to previously busy workplaces and crowded retail locations to make them safe and regulatory compliant, resulting in an extended period of low human traffic and decreasing recurring income. On the flip side, people realised that residential dwellings had become more than just a place to live. As governments worldwide announced different form of lockdown and social restriction measures, the normalising of working from home arrangement had led many to expand and transform their residential spaces.

COMBATING THE PANDEMIC TOGETHER

As one of the largest real estate developers in Indonesia, we adopt a nimble and reactive business model that allows us to respond rapidly and efficiently to any unexpected circumstances or changes. Upon receiving news that the COVID-19 virus had reached Indonesia, our Management Committee Crisis ("CMC") immediately galvanised the COVID-19 response task force and began integrating action plans with inputs from all business units. The safety of our key stakeholders such as employees, tenant, customers, governments and communities took priority in these plans.

Since then, the Group has initiated and undertaken many preventive and precautionary measures to curb the spread of the virus. Other than issuing health kits that consist of surgical masks, face shields and gloves to every employee, our employees were also instructed to adopt a flexible work-from-home arrangement, replace physical meetings with web-based conferencing platforms and practice social distancing. The physical office area and workstations were thoroughly sanitised regularly. In addition, we conducted routine COVID-19 screening tests for our employees working in the front line and for those that commute via public transport.

Property managers were tasked with ensuring our premises remained accessible and open to tenants and customers, with minimal disruption, through safety measures such as mandatory temperature scanning via thermal scanner, adhering to safe social distancing, provision of hand sanitisers, tracking procedures and distribution of information. To render assistance to the local government and surrounding communities, the Group donated COVID-19 rapid test kits, personal protective equipment, surgical masks, face shields, thermometer guns and portable handwash facilities. Also, the Group handed out food and supplement to people that suffered from economic hardship due to the pandemic, as well as gift hampers to COVID-19 patients and healthcare professionals who worked tirelessly during this challenging period.

REASSURANCE OF OUR SUSTAINABILITY COMMITMENT

The happenings of 2020 have further reaffirmed our commitment to continue investing towards our sustainability vision. Developed in 2017, SML's Sustainability Vision is based on four foundation pillars, being "Best in Class Real Estate", "Climate Change & The Environment", "Sustainable "Educational Community", and Patronage". These pillars are mapped to the relevant United Nation's Sustainable Development Goals ("SDGs") with details spelt out later in this report.

This is SML's fourth sustainability report and serves as an important tool to measure, manage and communicate our sustainability performance to every stakeholder. As sustainability disclosure continues to increase in prominence globally, we aim for consistent improvement, transparent disclosure and expansion of scope by aligning with international and national guidelines such as the Global Reporting Initiative ("GRI") Standards and the 2016 SGX Sustainability Reporting Guide.

This year, we have expanded the scope by including landed houses to the existing disclosed buildings and projects within BSD City and the Jabodetabek area. Following the expansion, our gross floor area ("GFA")

and GFA Occupied covered in this report have changed by 6% and -12% to 2.75 million m² and 1.67 million m² respectively. The increase in GFA is in line with SML's disclosure roadmap that outlines our sustainability reporting scope expansion progress and future scope expansion targets. Through this roadmap, we target to cover the entire Indonesia operations and properties by 2021 and internationally by 2022.

Other than expanding our scope, we conducted a materiality review in 2020 to reassess if our existing focus areas and topics were still relevant to us. This review was completed even though we did not conduct a largescale materiality assessment similar to that of 2019 where we engaged our stakeholders through various focus group discussions and surveys. The result from 2020 materiality review highlighted that due to the ongoing COVID-19 pandemic, most of our stakeholders' concerns were focused towards health and safety, hereby validating that our four foundation pillars continue to remain relevant.

Upon understanding the needs of our stakeholders, we placed more emphasis on their safety and wellbeing. Hence, we are glad to report that there were no severe health and safety incidents involving our staff, customers and tenants. Also, the well-being and progress of the local communities within and surrounding our developments are key to SML's sustained prosperity and success. Because of that, we continue to

make strategic investments into local infrastructure and participate in community engagements and development initiatives across our operating areas. As a founding corporate member at Green Building Council Indonesia, SML is committed to embed sustainable development into our core business specifically strategy, through "Green" incorporating building design and technological innovation in our products while continuing to be profitable. These initiatives and efforts have been recognised in Indonesia and internationally.

APPRECIATION

As COVID-19 ravages the lives of millions around the world, many healthcare workers and other frontline essential workers risk their lives to ensure that we are well-taken care of during this difficult period. We would like to salute all frontline medical and essential workers for their dedication and services while extending our sympathies to those that have lost their lives or livelihoods. In addition, we are thankful to all stakeholders for their unwavering trust and support.

Moving forward, 2021 will present numerous opportunities to re-evaluate our operations and initiatives in response to the COVID-19 situation and our stakeholders' needs. We are excited to continue finding ways to work with you to create greater economic, environmental and social value for Indonesia and beyond.

FRANKY OESMAN WIDJAJA Executive Chairman

MUKTAR WIDJAJA Executive Director and Chief Executive Officer



This report covers the period from 1 January 2020 to 31 December 2020 ("FY2020") and shall review all aspects of our sustainability work and performance for FY2020, starting with materiality and stakeholder engagement, followed by discussion of our performance, practices and initiatives within each of Sinarmas Land's four foundation pillars. We continue to report in line with the GRI standards and the SGX listing requirements. We are of the opinion that GRI remains the most relevant and internationally recognised framework, allowing us to contribute additional comparative information to the sustainability community. In addition, GRI standards help us to ensure the accuracy, reliability, clarity, and comparability of the information presented in this report.

SCOPE EXPANSION

Starting from our first sustainability report back in 2017, Sinarmas Land's sustainability practices and scope have expanded significantly as we mature and grow in our sustainability journey. Initially, our coverage was limited to just BSD City. We have since included more operations into the report each year and rolled out additional sustainability initiatives and reporting practices throughout the Group. We aim to cover all of our operations' developments and properties in Indonesia by 2021 and internationally by 2022. Last year, we expanded the scope to include JBDTK and this year, we further expand to include landed houses in those areas. Below is a roadmap of SML's sustainability progress regarding our reporting scope expansion and future scope expansion targets.

	BSD City	JBDTK	Outside JBDTK
2017	Building (AM, RH, Comm) • Green Buildings		
2018	Building (AM, RH, Comm)Green BuildingsNon-Green Buildings		
2019	 Building (AM, RH, Comm) Green Buildings Non-Green Buildings Landed Houses 	Building (AM, RH, Comm)Green BuildingsNon-Green Buildings	
2020	 Building (AM, RH, Comm) Green Buildings Non-Green Buildings Landed Houses 	 Building (AM, RH, Comm) Green Buildings Non-Green Buildings Landed Houses 	
2021	 Building (AM, RH, Comm) Green Buildings Non-Green Buildings Landed Houses 	 Building (AM, RH, Comm) Green Buildings Non-Green Buildings Landed Houses 	Building (AM, RH, Comm) • Green Buildings • Non-Green Buildings



Buildings under property management will be sorted into 7 categories:

We have not sought external assurance for this report; however, we continue to focus on improving our data collection processes and controls to be ready for this step in the future. To quantify our FY2020 report's scope expansion, we used GFA and GFA Occupied as a yardstick for measurement. Our total GFA in FY2020 increased 6% to 2.75 million m² following the inclusion of new projects such as GOP 1, QBig Block G. However, GFA Occupied decreased 12% to 1.67 million m² due to decline in occupancy of office buildings and ITCs (Trade Centres) which were closed for several months during the COVID-19 pandemic.

We recommend reading this report together with SML Annual Report 2020, which provides key information on our financial performance, as well as additional detail on our corporate governance and risk management. Both reports are critical communication materials in our ongoing engagement with stakeholders.

This report uses standard units of measurement. Conversion factors, where required and applicable, are explained in their respective sections. For any questions regarding this report, please contact Muhammad Reza Abdulmajid, Chief Risk Officer, Sinarmas Land at sustainability@sinarmasland.com.

BOARD STATEMENT

The Board of Sinarmas Land continues to take responsibility for this sustainability report and remain active in its preparation. This report has been prepared following the GRI Standards: Core Option. It also meets the requirements of the 2016 SGX Sustainability Reporting Guide in all material aspects.

The Board remains active in reviewing and revising, if necessary, Sinarmas Land's strategy and approach to sustainability, which guides the sustainability efforts of the Group and the content of this report. The Board has endorsed the material ESG topics for our 2020 report and is agreeable to the additional emphasis on health and welfare matters.

The Board's endorsement takes into consideration the results of our 2020 materiality review and stakeholder engagement activities. Details of our stakeholder engagements can be found under the sections "Materiality and Stakeholder Engagement" in page 18 and "Engagement Program for All Stakeholders" on page 41.

We continue to use GRI as one of the most commonly used internationally recognised frameworks and will update our disclosures based on new developments in the standards. We also keep our strategy and report up-to-date with directives by institutions such as the United Nations Global Compact ("UNGC") and the Brundtland Commission, and continue to track our progress against the SDGs. We remain a signatory of the UNGC through the Indonesia Global Compact Network ("IGCN").

The Board does not preside over sustainability efforts in isolation due to the need to integrate sustainability into all aspects of the Group's activities. The Board continuously engages with the Audit and Risk Management Committee ("ARC") to provide oversight on significant environmental, social and governance issues that might potentially impact SML's longterm business objectives. The ARC, in turn, reviews SML's sustainability programs and keep the Board updated on all relevant developments.

our Approach

IN THIS SECTION

Sinarmas Land has invested significant amount of time and effort towards our sustainability practices in the belief that it is our responsibility to do the right thing for our stakeholders and the environment. This section details Sinarmas Land's sustainability vision and approach and how that aligns with our core values. We also describe our sustainability governance structure and how we conducted our materiality review and stakeholder engagement in 2020.

SINARMAS LAND'S SUSTAINABILITY VISION

Sinarmas Land developed its sustainability vision in 2017, which represents our sustainability principles and core business strategies. Since then, we have constantly reviewed our sustainability vision's relevance on a yearly basis.

Our vision consists of four foundation pillars. The "Best in Class Real Estate" pillar is anchored in our business activities as we strive to provide top quality real estate and excellent value to support socio-economic growth in Indonesia. "Climate Change & The Environment" is our pillar dedicated to the crucial global issue and our contribution to global climate resilience. Under "Sustainable Community", we commit to support local communities and invest in various positive, impactful community projects. Finally, "Educational Patronage" demonstrates our promise to advance education levels and increasing opportunities for our local communities.

Our policies, practices, initiatives and targets focus on achieving this vision for Sinarmas Land's stakeholders. Each business, operations or sustainability related decision is made whilst considering this sustainability vision.

SINARMAS LAND'S SUSTAINABILITY VISION



By providing state-of- the art facilities and services of the highest quality and with excellent value, we are making a unique contribution to the prosperity of current and future generations, as well as to Indonesia as a whole.



We recognise the need to mitigate climate change and are in a position to contribute positively to Indonesia's commitments under the Paris Climate Agreement.



As part of our commitment towards the Indonesian people, we actively engage with our stakeholders and work on a number of large scale community projects.



We are committed in ensuring that everyone within the communities of operations, independent of their gender or age, and at thier own discretion, has equal access to our education ecosystem.

SINARMAS LAND'S SUSTAINABILITY GOVERNANCE AND CORE VALUES



BEST IN CLASS REAL ESTATE

Our Best in Class Real Estate pillar is the top priority for Sinarmas Land. We believe that by providing state-of-theart facilities and services of the highest quality, we are able to create value for our business, stakeholders and communities. Our developments and properties provide safe, accessible and convenient spaces that allow people who use them to live, work and play in comfort, thereby contributing to the positive socio-economic environment in areas that we operate. In particular, our new developments and forwardlooking city planning support the area's regeneration through increased access to economic activities, thereby building a stronger and more resilient local economy. This has been particularly important in 2020 due to national movement restrictions that have limited access to economically generating activities such as retail and leisure. Specifically, under this pillar, we are committed to:

- being the best-in-class city planning (as represented by BSD City in its entirety);
- developing top-quality offices, commercial (e.g. Indonesia Convention Exhibition), retail (e.g.

AEON Mall BSD City) spaces, residential properties, in accordance with leading engineering and environmental standards; and

 contributing to the development of modern physical and public transport infrastructures, including schools, hospitals and neighbourhood markets

These activities are aligned with SDGs number:





CLIMATE CHANGE &

As one of the largest real estate developers in a climate-sensitive country such as Indonesia, Sinarmas Land is acutely aware of the need to mitigate and adapt to climate change. Our industry is a significant contributor to Greenhouse Gas ("GHG") emissions. Hence, we are committed to manage our GHG emissions as part of our responsibility to address this global challenge and contribute to Indonesia's commitments under the Paris Climate Agreement. Specifically, we are committed to:

- steadily growing the percentage of developments built that follows internationally recognised "Green" standards (e.g. BCA Green Mark, LEED, Greenship);
- continue to develop public transport and logistics facilities within its projects to minimise unnecessary carbon emissions during transportation of humans and goods; and
- contribute by any means possible to the decarbonisation of Indonesia's economy (e.g. through energysaving efforts within our projects, lobbying, collaboration with industry peers)

These activities are aligned with SDGs number:



	Metric	Coverage	Baseline year	Target	Baseline vs 2020
Energy	Energy Intensity	Green Buildings	2017	5% reduction in 8 years or by 2025	-10%
V	Energy Intensity	High-Rise Buildings	2019	3% reduction in 8 years or by 2027	-9%
Emissions	Emission Intensity	Green Buildings	2017	5% reduction in 8 years or by 2025	-10%
-0	Emission Intensity	High-Rise Buildings	2019	3% reduction in 8 years or by 2027	-9%
Water	Water Intensity	Green Buildings	2017	10% reduction in 8 years or by 2025	-19%
	Water Intensity	High-Rise Buildings	2019	2% reduction in 8 years or by 2027	-18%

We have set the following targets with 2019 as our baseline in our efforts to excel in this area of focus. We note that progress has been slightly delayed due to COVID-19 restrictions and prioritising the focus on this crisis:

No	Description	Types of Target	3-year target	Baseline vs 2020
1	Tree Planting (Township, Residential & Commercial)	Number of trees planted	To plant 31,803 new trees	22%
2	Ruang Terbuka Hijau ("RTH") or Green Open Space	Number of developed RTH (Public & Private)	1,420,110 m ²	7%
3	Biopori (Residential & Commercial)	Number of biopori holes	17,916	6%
4	Public Transport Program for BSD City	Number of Bus Stops and	- Bus stop: 20% increase from existing units	9%
		Passengers	- Passengers: 5.5% increase per annum from base year passengers	28%
5	Length of Pedestrian walkway	Number of developed pedestrian length	9,749 metres	0%

our Approach



We believe that a community can and should grow with the businesses operating within and around it. The Indonesian people are a key contributor to our success, and it is our duty to contribute positively back to society. We are committed to:

- creating jobs and business opportunities within BSD City and beyond;
- improving the surrounding community's well-being by enhancing their entrepreneurial skills and capabilities;
- ensuring the sustainability of Micro, Small and Medium Enterprises ("MSMEs") businesses within SML's surroundings by introducing Digital Payment System;
- promoting a healthy and clean lifestyle; and
- conducting capacity building activities for MSMEs at SML's modern markets



EDUCATIONAL PATRONAGE

Sinarmas Land believes that knowledge and education are the most important prerequisites for the sustainable development of our society. In addition, we believe that education should not be a privilege afforded by a few but a right for all, independent of their race, gender or age. We are committed to:

- investing in state-of-the-art educational facilities in and around BSD City; ensuring students are well-prepared for the growing demand of current and future modern job markets through various initiatives, such as providing scholarships for computer programming; and
- improving the learning process in Primary and Secondary Schools through teacher training programs, as well as economic and cultural knowledge programs for local communities near SML projects

These activities are aligned with SDGs number:



We have set the following targets with 2019 as our baseline in our efforts to excel in this area of focus:

No	Description	Types of Target	5-year target	Baseline vs 2020
1	IT Coding	Number of	100 students	13%
	School Scholarship	scholarship receivers	80% employment rate	8%
2	Pasar Rakyat	Number of events	Activities: 60	10%
	School	Number of participants	Market Managers: 2,400	7%

These activities are aligned with SDGs number:



We have set the following targets with 2019 as our baseline in our efforts to excel in this area of focus:

No	Description	Types of Target	5-year target	Baseline vs 2020
1	Gerakan Sekolah Menyenangkan ("GSM")*	Number of schools	500 Schools with green habit program	45%
2	BSD Knowledge House (Rumah Pintar)	Number of activities	860 interactive activities from all centres	25%
3	Berantas Buta Quran (Learn How to Read the Quran) **	Number of participants	1,500 participants	0%

*) This program ended in 2020 and will be replaced by the "Bina Sekolah" program.

**) This program has been postponed due to the COVID-19 pandemic.

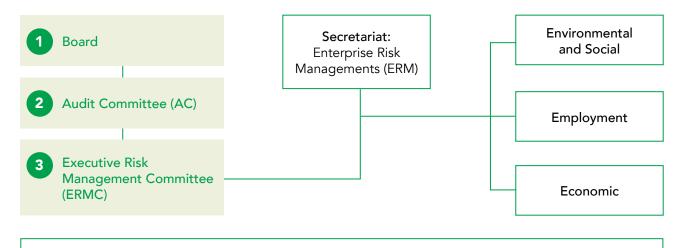
GOVERNANCE & RISK MANAGEMENT

SML has a strong corporate culture, and our sustainability strategy interweaved with our core values which are:

- Positive Attitude
- Integrity
- Commitment
- Continuous Improvement
- Innovation
- Loyalty

We believe that sustainability can only be truly achieved once it is fully integrated into our operations and decision-making processes. Building on that belief, our sustainability initiatives have been integrated into the Group's overall governance and operations, with direct guidance and involvement from the Company's management team. Our sustainability structure comprises senior management, middle management and employees from various functions. Our Executive Risk Management Committee ("ERMC") comprises 15 senior leaders from different strategic business units ("SBU") and support functions. We have identified three Person-in-Charge ("PIC") with their roles and responsibilities clearly spelt out, each being responsible for overseeing the Company's respective environmental and social, employment and economic functions. They are supported by process owners of the respective sustainability topics and programs.

Following the integration of sustainability principles into our existing risk management structure, sustainability considerations form a part of our decision-making process. Management of all levels are regularly updated on key developments and changes that may potentially affect our operations and performances, along with any follow-up progress and mitigation actions taken. We reviewed and mapped the most significant issues to our Enterprise Risk Management ("ERM"), except for specific environmental topics, such as risks relating to waste management and the materials used in our construction activities. These omitted topics will be reviewed for inclusion in our 2021 risk assessment and sustainability program.



ROLES & RESPONSIBILITIES OF BOARD AND COMMITTEES

1

Provide oversight on significant environmental, social and governance issues that might impact SML long-term business objective. 2

Review SML sustainability program and reports and ensure full company support towards sustainable development. 3

Agree on sustainability program & target and review the performance achievement on semi-annual basis.



MATERIALITY AND STAKEHOLDER ENGAGEMENT

In 2019, we undertook an extensive review of our material sustainability issues through a comprehensive stakeholder engagement which included focus groups and surveys, resulting in the revision of our materiality matrix.

In 2020, we revisited our material sustainability topics as part of our practice of keeping these topics relevant. This year, we conducted desktop research and analysis to review our sustainability work in the context of global, regional and industry developments and supplemented this research with various stakeholder engagement (Note that our usual survevs customer and tenant survey was not conducted in 2020 due to COVID-19 restrictions. Please refer to our 2019 report for the most recent customer and tenant engagement). Thereafter, we discussed our findings with the Company's management team to validate and approve the selection of material sustainability topics for 2020.

Our materiality review aligns with GRI's Principles for Defining Report Content. Specifically, the Principles of Stakeholder Inclusiveness was addressed through our stakeholder engagement surveys. The Principle of Sustainability Context was the aim of our desktop context review, and the Principles of Materiality and Completeness were addressed in the management level discussion of the results of our context review and stakeholder outreach.

STAKEHOLDER ENGAGEMENT

1. Context review and stakeholder engagement 2020

The 2020 context review and stakeholder engagement aim to determine the relevancies of our four pillars and material ESG topics identified to the current sustainability landscape and emerging trends. This involved three steps:

- 1. Desktop context review
- 2. Internal stakeholder engagement survey
- 3. Management validation session

The desktop context review involved a landscape analysis of recent developments and sustainability trends, both globally and regionally. This analysis included developments sustainability reporting best in practice, such as the World Economic Forum's report entitled "Toward Common Metrics and Consistent Reporting of Sustainable Value Creation", the creation of the Value Reporting Foundation by the Sustainability Accounting Standards Board ("SASB") and the International Integrated Reporting Council ("IIRC") and recent consultations on changes to the materiality definitions in the GRI Standards. The analysis also acknowledged the increasing regulations in both Singapore, driven by MAS and SGX, and Indonesia, driven by IDX. In addition, the analysis considered changes in the real estate sustainability landscape such as increasing demand for ecoefficient buildings, contribution to the development of circular economy via the usage of recycled materials, and the growing prominence issuance of green bonds or loans. Responses to COVID-19 and COVID-19 restrictions featured heavily in the analysis, with research demonstrating changes in behaviours such as increased working from home and placing a higher priority on safe and healthy living and working environments.

These findings were translated into an internal stakeholder engagement survey, requesting stakeholders to rank sustainability topics on a scale of least to most important. There were 145 respondents to the survey, representing a balanced mix of employment across the Group. According to the survey results, topics of most importance to the stakeholders that responded includes: waste management, GHG emissions, workplace health and safety, customer health and safety, anti-corruption and indirect economic impacts.

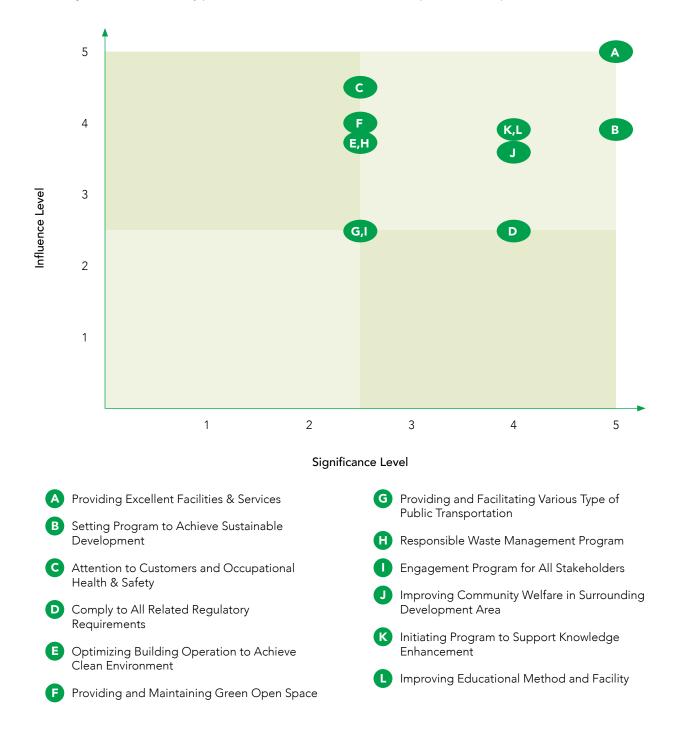
The context review and stakeholder engagement exercise indicate that our 2019 sustainability topics remain relevant. To supplement our disclosure, we will share, in greater detail, initiatives implemented by the Group to safeguard our stakeholders against the COVID-19 pandemic later in the report.

2. Employee Engagement Survey

Every year, the Group will conduct an employee engagement survey for all permanent and retired contract employees of staff level and above. Each question is based on a 4-scale measurement, and employees were encouraged to fill the questionnaires through an online application. SML Human Capital team prepared the questionnaire based on employee engagement survey best practices with the intention of capturing material issues. In 2020, the participation rate was 87.2%, an increase of 9.86 percentage points from 2019. The results have been compiled and presented to the Company's management team before being incorporated into SML's materiality assessment and material topics in this year's report.

MATERIAL SUSTAINABILITY TOPICS 2020

Results from 2020 materiality review indicate that 2019 topics remain relevant to our stakeholders. Hence, there are no changes to the sustainability pillars, areas of focus and material GRI topics for 2020 report.





MAPPING MATRIX TOPICS TO GRI STANDARDS

The updated materiality matrix was reviewed and approved by both our senior managers and the ERMC. We have integrated our revised areas of focus, identified as being the most material issues to our business and stakeholders, into SML's four foundation pillars. Subsequently, we mapped the corresponding GRI topics to the focus areas the table below.

We welcome feedback from our readers regarding the results of our

materiality assessment and any other aspect of our report and Sinarmas Land's sustainability efforts. Please contact Muhammad Reza Abdulmajid, Chief Risk Officer, Sinarmas Land, sustainability@sinarmasland.com. We look forward to hearing from you.

Sustainability Pillar	Area of Focus	GRI Topic	
Best in Class Real Estate	Providing Excellent Facilities & Services	201 - Economic Performance	
		202 - Market Presence	
		205 - Anti-Corruption	
		401 - Employment	
		402 - Labour-Management Relations	
		405 - Diversity and Equal Opportunity	
	Setting Program to Achieve Sustainable	201 - Economic Performance	
	Development	203 - Indirect Economic Impacts	
	Attention to Customers and Occupational	403 - Occupational Health and Safety	
	Health & Safety	416 - Customer Health and Safety	
	Comply to All Related Regulatory	307 - Environmental Compliance	
	Requirements	416 - Customer Health and Safety	
		417 - Marketing and Labelling	
		419 - Socioeconomic Compliance	
Climate Change & The	Optimizing Building Operation to Achieve	301 - Materials	
Environment	Clean Environment	302 - Energy	
		303 - Water and Effluents	
	Providing and Maintaining Green Open Space	305 - Emissions	
	Providing and Facilitating Various Type of Public Transportation	305 - Emissions	
	Responsible Waste Management Program	303 - Water and Effluent	
		306 - Effluents and Waste	
Sustainable Community	Engagement Program to All Stakeholders	413 - Local Communities	
	Improving Community Welfare in Surrounding	203 - Indirect Economic Impacts	
	Development Area	413 - Local Communities	
Educational Patronage	Initiating Program to Support Knowledge	203 - Indirect Economic Impacts	
	Enhancement	404 - Training and Education	
		413 - Local Communities	
	Improving Educational Method and Facility	203 - Indirect Economic Impacts	

BEST IN Class Real Estate

IN THIS SECTION

The following section describes an overview of Sinarmas Land's efforts to provide best in class real estate and products to our customers. We have identified four areas of focus that are vital to our success:

- 1. Providing excellent facilities and services
- 2. Attention to customers and occupational health and safety
- 3. Setting programs to achieve sustainable development
- 4. Compliance to all related regulatory requirements

PROVIDING EXCELLENT FACILITIES AND SERVICES

The ability to meet and exceed our customers' needs is crucial in our business. We set targets and undertake initiatives to ensure that our product quality standards are maintained throughout the development to property management stages.

For development projects, our team perform the following to ensure that the quality matches our prospective customers' expectation:

- Market research to understand current trends as well as our customers' needs and wants;
- Perform stringent selection and tender to obtain the best material vendor and contractor; and
- Conduct quality assurance checks along the development process.

After the development is completed and handed over to our customer, the team conducts an after-sales service to obtain immediate feedback or address any concerns they might have. Transforming our role from a developer to property and township manager allow our customers to take comfort in the continuation of the following services on our properties:

- Regular building equipment, residential and township maintenance;
- Ensure health and safety for building occupants;
- Ensure safeness for all properties, residences and townships, managed by SML; and ensure the availability of public facilities, such as places of worship, malls and hospitals.

We continue to be recognised for our commitment toward meticulous planning and design, and am glad to share that we were awarded the Best Millennials Housing Design (Indonesia Property Award 2020).

To complement our products and facilities, SML provides the following services to meet the needs of our customers:

Customer feedback from various channels is centrally consolidated and channelled internally to the respective team for immediate attention. Led by our Customer Relations & Service Quality Division, this ensures that all feedback is received, tracked and appropriately addressed.

OneSmile

Integrated

Customer

Service



OneSmile is an integrated mobile application for residents in BSD City with various features such as payments to the Public Utility Board ("PUB"), purchasing of tickets for events and theme parks, direct chat function to our customer care representative, news feed, nearby transportation schedules, food and grocery delivery options, and household maintenance requests.

Mobile Customer Service



Our mobile customer service allows customers to get hold of our customer care representatives at the touch of a button, regardless of time and location.

Front Liner Application System



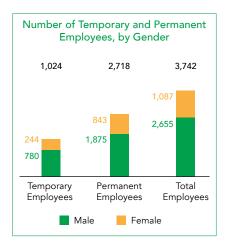
Implementation of the integrated Front Liner Application System ("FAS") allows frontline staff to direct customer feedback to the appropriate business units, monitor satisfaction resolution from related units of buildings and environments in real time to track and accelerate the complaint resolution process more efficiently.

BEST IN Class Real Estate

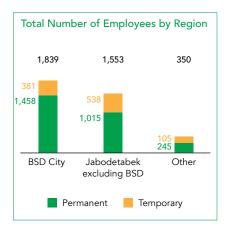
Our Employees

We recognise that our human capital is an essential asset to continue providing the best products and services to our customers. As of 31 December 2020, SML employed a total of 3,742 (2019: 3,727) employees, of which 2,655 are male (71%) and 1,087 are female (29%). In general, the nature of our business, i.e., construction and real estate development, lends itself to a larger proportion of men in the workforce. Despite this challenge, we strive to be an equal opportunity employer by maintaining gender diversity to the best extent possible.

Our entire workforce comprises of fulltime employees. 1,024 employees, or 27% of the workforce, are hired bases on a fixed contract or temporary term. Fixed contracts typically consist of a one-year term. The breakdown by gender according to the type of employment contract is visualised through the two charts below.



Among the total number of employees, 1,839 are based in BSD City, 1,553 in Greater Jakarta or Jabodetabek, and the remaining 350 are based in other regions across Indonesia. We show a further breakdown by employment contract in the following chart.



Diversity and Equal Opportunity

Our employee handbook and employment practices underscore our commitment to fair labour practices. As our Equal Opportunities Policy on employment stipulates, we strictly prohibit any form of discrimination on the grounds of race, national origin, religion, disability, gender, sexual orientation, union membership and political affiliation. We expect all employees to be treated with fairness and respect.

As of 2020, our governance bodies consisted of 19% female and 81% male employees. All of the governance bodies' members are above the age of 30, among which 31% are between the ages of 30 and 50. The remaining 69% are above 50 years of age.

When examining the breakdown of employees, female employees make up 7% of non-staff (supporting function workers), 40% of staff, 35% of managers, 34% of senior managers, and 19% of top management. We are continuing to make efforts to ensure diversity, especially among middle-management and above.

In terms of age diversity, 14% of nonstaff, 12% of staff, 30% of managers, 47% of senior managers, and 69% of top management are composed of employees above the age of 50. Employees are compensated according to their expertise and experience. At SML, the remuneration ratio for men and woman (including Top Management & Senior Manager) is 1:1 for all levels. Remuneration includes salary, incentives and bonus.





New Hires and Employee Retention

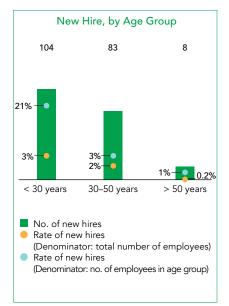
We recognise that welfare and career development contribute significantly to the satisfaction and reputation of our workplace.

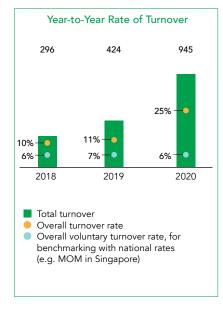
The results of our proactive engagement with employees show that there are no significant levels of dissatisfaction. In 2020, we hired 195 (2019: 336) new employees, contributing to a new-hire rate of 5% (2019: 9%). Our belief that diversity strengthens our organisation is demonstrated by our recruitments efforts to hire people of different backgrounds – regardless of age or gender.

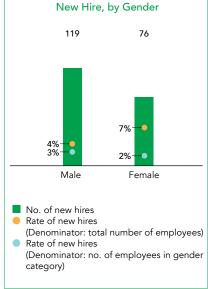
Our number and rate of new hires, across age groups, genders and regions, dropped in 2020 in comparison to 2019. In addition, SML's turnover rate during the reporting year was 945 (2019: 424),

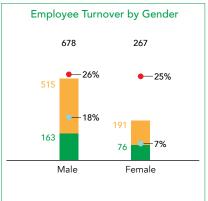
equivalent to an overall turnover rate of 25%. The increase in turnover was largely due to impact from the COVID-19 pandemic, which necessitated rationalisation of contract employees, and the closures of Le Grandeur Balikpapan and Le Grandeur Mangga Dua Hotel.

A further breakdown of metrics related to new hires and turnover are shown below:



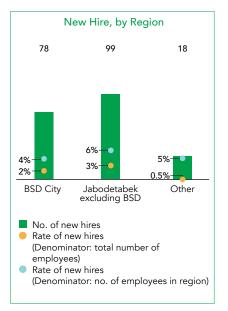


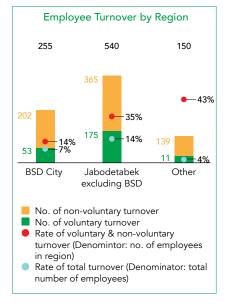




No. of non-voluntary turnover
 No. of voluntary turnover
 Rate of voluntary & non-voluntary

- turnover (Denomintor: no. of employees in gender category)
 Rate of total turnover (Denominator:
- total number of employees)





BEST IN Class Real Estate

Benefits and Welfare

Aside from compensation, we offer a competitive set of welfare and benefit schemes, including but not limited to insurance coverage, healthcare benefits, parental leave, and pension plans.

Family-friendly Employer

SML strives to create a family-friendly environment through the provision of parental leave. In 2020, 65 female and 117 male employees took their maternity and paternity leaves respectively. As of 31 December 2020, 90% of the employees had returned to their work. In addition, the previous cohort of 185 employees who had taken parental leave in 2018 also returned to work, and 148 of these employees are still employed 12 months later.

We provide the details, broken down by gender, on the statistics above in the following tables:

Return to Work Rate in	2020			
Type of Parental Leave	No. of employees who utilised their parental leave in 2020	No. of employees who returned to work in 2020 after their parental leave (as of 31 Dec 2020)	No. of employees who are still on parental leave in 2020 (as of 31 Dec 2020)	Return to work rate
Maternity leave for female employees	65	47	18	72%
Paternity leave for male employees	117	117	0	100%

Retention Rate			
Type of Parental Leave	No. of employees who returned to work after their parental leave in 2019 (as of 31 Dec 2019)	No. of employees who returned to work after parental leave ended and were still employed 12 months later (as of 31 Dec 2020)	Retention rate
Maternity leave for female employees	50	44	88%
Paternity leave for male employees	135	104	77%

Respecting Freedom of Association and Collective Bargaining Rights

SML respects employees' fundamental rights to freedom of association and unions. We follow regulation set out by the Indonesian government (as ratified by the ILO) which allows trade unions to represent our employees for collective bargaining, providing our employees with a way to seek remediation for disputes. A total number of 12 employees (0.4% of our total workforce) are covered by collective bargaining agreements. This is a change from 240 employees last year, as the properties (Le Grandeur Balikpapan and Le Grandeur Mangga Dua Hotel) corresponding to the most of those employees are no longer in operation.

Above the Minimum Wage

Consistent with our belief in providing appropriate work remuneration, we compensate our employees based on experience, position, and competency. We adhere strictly to the government's minimum wage levels and have eliminated any gap differences between males and females.

Retirement Plans and Other Defined Benefits

SML complies with relevant government regulations in the following manner:

1. Severance pay for retired employees in accordance with UU Tenaga Kerja No.13/2003

- 2. Mandatory Defined Contribution Plan (Jaminan Hari Tua) by BPJS Ketenagakerjaan
- 3. Mandatory Defined Benefit Plan (Jaminan Pensiun) by BPJS Ketenagakerjaan

ATTENTION TO CUSTOMERS AND OCCUPATIONAL HEALTH AND SAFETY

Safety is integral to our product and service excellence. We prioritise customer and occupational health safety ("OHS") through various initiatives, including safety policies for employees and processes to monitor and manage incidents.



CASE STUDY KEEPING OUR EMPLOYEES AND TENANT SAFE DURING THE COVID-19 PANDEMIC

Responding the COVID-19 to pandemic is a challenge for any business. Many companies were left scrambling to craft policies and strategies needed to protect their employees and stakeholders from COVID-19 – all while trying to minimise the pandemic's impact on their businesses. SML realise the urgency of addressing these challenges and did our part to help prevent the further spread of the virus while supporting the needs of our customers, tenants, employees, and communities.

The Group has collaborated with Healthcare Provider (Eka Hospital, SehatQ Clinic, Bumame Clinic) and the respective regional Government (Jabodetabek Area) on the below initiatives and with the aims to:

- Protect our employees and limit their exposure to COVID-19 in workplace area;
- Safeguard our tenants' work location and ensuring the sustainability of their business;
- Provide comfort and a sense of security for customers when visiting SML properties;
- Support the communities and government program.

SML undertook the following initiation to prevent the spread of COVID-19:

- 1. Employees: SML has implemented the following measures to ensure the health and safety of our employees in their work location:
 - a. Implement health protocols within the office, such as availability of hand sanitiser, physical distancing facilities (work-desk divider), and rearrangement of work-space layout;



Provision of hand sanitiser and protective equipment for employees and visitors



Provision of Serology Test for front liners and employee

- Divide the employees in each Division and Function into two separate teams and work from different locations;
- c. Implement a flexible Work-from-Home ("WFH") policy depending on the existing condition and government directive;
- d. Issuance of COVID-19 health protocol policies for employees such as private and business travel policies, online meeting, lunch at employee's work desk, no social gathering, etc;
- e. Implementation of Geo-Work Attendance and Pandemic Self-Assessment system during Work-from-Office ("WFO");
- f. Implement COVID-19 response procedures for employees and daily cases monitoring by the CMC;

- g. Establishment of COVID-19 Task Force to monitor the implementation of health protocol;
- h. Conduct routine COVID-19 screening tests for front liners and employees who use public transport;
- Provide health kit for employees such as surgical mask, face shield and hand gloves;
- j. Provide and facilitate COVID-19 treatment (PCR swab test, doctor consultation, medical supplies, and vitamins) for employees with close contact, suspected or positive COVID-19;
- Circulate regular COVID-19 news, awareness and announcement to employees through SML Crisis Management websites, social media, emails, SMS, and building announcement system.

BEST IN Class Real Estate

- 2. Tenant & Customers: Numerous health protocols have been implemented in SML properties to support the safe reopening of businesses and public spaces as follows:
 - a. Physical Distancing:
 - Visible markings on the floors of elevators, reception area, toilets, and food court;
 - ii. Pre-packed food ready for takeaway and reconfiguring of sitting arrangement in the common dining area.
 - b. Reduce Touchpoints:
 - Reduce touchpoint of lift buttons using toothpick or foot pedal button;
 - ii. Implementation of touchless parking system;
 - iii. Upgrading to sensor faucets in toilets and pantries.
 - c. Building Hygiene:
 - i. Hand sanitisers at lift landings, reception area, food courts and other commonly visited areas;
 - ii. Increased cleaning and disinfecting frequency of office spaces, dining areas, toilets, and other common areas.
 - d. Building equipment and maintenance:
 - Regular maintenance of heating, ventilation, and air conditioning ("HVAC") system and cleaning of fan coil unit ("FCU") and air handling unit ("AHU") filters;
 - ii. Isolation room (temporary containment for medical emergency use);
 - iii. Additional portable handwash in entrance and other specific areas.
 - e. Front-line readiness:
 - PPE (surgical masks, hand gloves, facial shield, etc.) for building and outsource personnel;
 - ii. Mandatory temperature check at every building entrance using a thermal gun or thermal camera scanner for retail malls.



Keeping tenants and employees safe



Implementing safe distancing measures in public spaces

f. Health awareness:

- i. COVID-19 Health Protocol guidance for tenants;
- ii. Posters, banners, and signage at customer/visitor traffic path inside and outside the building;



Reminding people to protect themselves with face masks

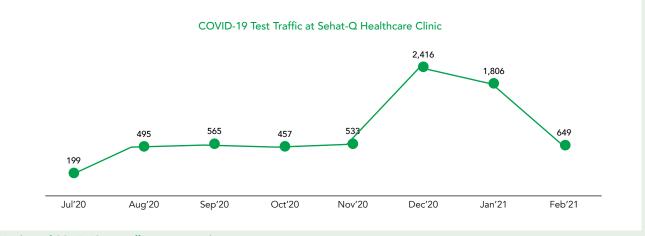
- iii. New normal protocol aired on public displayed LCD TV in the elevator area;
- iv. Circular announcement of COVID-19 cases incident inside the premises for tenants.

- Government & Communities: SML extended the following support to local government and communities:
 - a. Health kits (rapid test kits, surgical masks, hand sanitisers, disinfectants, personal protective equipment, face shields, thermo guns, portable handwash facilities, health protection tools, etc);
 - b. Food and supplement (rice, instant noodles, cooking oils, basic necessities and vitamins);
 - c. Corporate Partnership Collaboration with Pengusaha Peduli NKRI

(Entrepreneurs Care for the Republic of Indonesia), Tzu Chi Foundation and KADIN (The Indonesian Chamber of Commerce and Industry);

d. Others (Al-Quran and hampers for COVID-19 patients and healthcare workers).

As a form of concern for our employees and their families in getting through the pandemic and to comply with UU No. 6 of 2018 concerning Health Quarantine with the COVID-19 vaccination program, SML facilitate employees and their families to participate in government or private vaccination program (in collaboration with related association, health care and vaccine providers). Currently, the program is still ongoing while following guidance from the government. The goal is to protect employees and families from COVID-19 exposures and reduce the number of COVID-19 cases in Indonesia.



Numbers of COVID-19 test traffic at a partner clinic

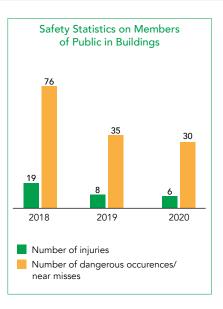
Ensuring Customers' and the Public's Well-being

We treat all incidents relating to our customers and the general public's well-being very seriously. All incidents involving members of the public such as visitors, occupants and tenants are reported as part of our Monthly Operations Report, which is submitted to the Divisions Heads and the Group Division Head (CEO).

As part of our Health, Safety, Environment ("HSE") awareness program for tenants, we organise regular activities to promote safety in our buildings. These include HSE socialisation, placement of safety signage in public spaces, corridors and food courts, earthquake drills, and fire drills with tenants and visitors.

In 2020, there were 6 injuries and 30 dangerous occurrences or near misses involving members of the public in our buildings or our property management portfolio. All injuries were minor, and victims were quickly attended to. This marks an improvement compared with 8 injuries and 35 dangerous occurrences or near misses in 2019.

An investigation is carried out after each incident, and the results will be filed in an incident investigation report. These reports are presented during the respective SBU's monthly operations meeting with corrective and preventative actions taken to improve our safety protocol.



BEST IN Class Real Estate

Our Disciplined approach towards ensuring Occupational Health and Safety

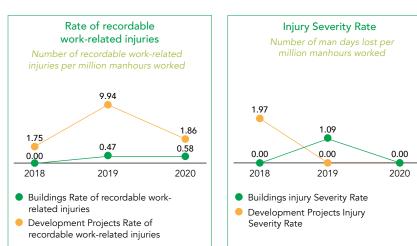
Our main health and safety focus in 2020 was on our COVID-19 response. Nonetheless, SML continues to implement emergency response and crisis management plans⁴.

Resulting from our continuous initiatives, we are pleased to report that there were no fatalities across our Buildings and Development projects in 2020.

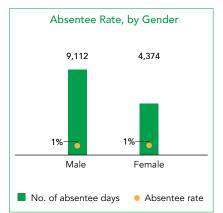
There were three work-related injuries involving our employees or contractors in our buildings under the Asset Management, Commercial, and Retail & Hospitality Group Divisions, all of which were minor and resulted in no lost days.

Among our development projects, there were eight work-related injuries in 2020. All injuries were sustained by contractors working in Southgate Phase 1 and 2 development projects. Most accidents occurred due to misuse of equipment such as a saw or grinder. All cases were minor or moderate injuries, requiring first-aid level medical treatment only, with no lost days.

As a result of these injuries, we recorded a work-related injury rate (formerly Accident Frequency Rate) of 0.58 for buildings and 1.86 for development projects; the Injury Severity Rate (formerly Accident Severity Rate) was 0 across our entire operations.the Injury Severity Rate (formerly ASR) was 0 across our entire operations.



In 2020, the overall absentee rate of our employees was 1.3% (2019: 1.0%) with the breakdown by gender and region shown in the charts below.

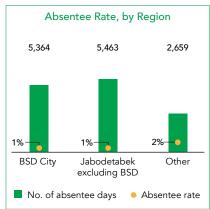


In addition, we have implemented the following initiatives to promote a healthy work-life balance lifestyle for our employees:

- Discounted gym memberships for permanent employees;
- Employees' Running Club;
- After work sports activities (basketball, futsal, badminton, volleyball, etc.);
- Blood donation events.

For health and safety, the following initiatives by SML are noteworthy:

 Health and safety awareness through SML intranet and socialisation events;



- Regular fire drills involving all employees and tenants;
- Health and safety training for emergency response team;
- Installation of safety signage in various critical areas of our buildings;

SETTING PROGRAMS TO ACHIEVE SUSTAINABLE DEVELOPMENT

SML is an industrial leader in green building and a role model for other property companies to embrace and invest in "Green" concept building in Indonesia. We emphasise on technological innovation and environmental preservation to uphold

⁴ Please see our past reports for details on our emergency response and crisis management which remain relevant

our responsibility and commitment to our stakeholders and Mother Nature. We are committed to develop a sustainable city guided by the Smart City theme. We also aim to incorporate the "Green" concept into the developments of our products. SML will continue to leverage on our green building expertise and technological innovation to improve our products' quality and value, thereby enhancing our tenants' well-being. BSD Green Office Park is a centrepiece of SML's sustainable development and digital innovation targets and aspirations.

The following awards were achieved by SML in the reporting period⁵:

Iconomics Public Relation Award 2020

 Indonesia CSR Brand Equity Award 2020 – Property Category

Property Guru Indonesia Property Award 2020

- Sinar Mas Land Best Developer Award 2020
- Sinar Mas Land Best Millennial Housing Development – Imajihaus at Greenwich Park (BSD City)
- Sinar Mas Land Best Housing Development – Caelus at Greenwich Park (BSD City)
- Sinar Mas Land Best High-End Housing Development – Caelus at Greenwich Park (BSD City)

Property Guru Asia Property Awards 2020

- Sinar Mas Land Best Developer Award 2020 (Indonesia)
- Sinar Mas Land Best Housing Development (Indonesia) – Caelus at Greenwich Park by BSD City

FIABCI Indonesia REI Excellence Awards 2020

 Sinar Mas Land - Gold Winner for Green Office Park 1 Building – Office Building category

We have made significant strides towards improving environmental impact by implementing green building standards in our flagship properties. We will continue to pursue green standards certification for new buildings while gradually implementing these standards for other buildings across the Group where feasible. We hope to complement these efforts by promoting greenery in our development projects and other existing buildings managed by SML.

COMPLIANCE TO ALL RELATED REGULATORY REQUIREMENTS

For the past 48 years, SML has built a reputation as a reliable partner to our stakeholders, including the government, customers and the communities we operate in. To maintain our reputation, it is essential for SML to comply with regulations at national and regional levels. These regulations include land acquisition, operational permits, design and construction, finance and accounting, labour laws, customer protection, fair marketing procedures, and environmental frameworks. Also, SML has adopted a zero-tolerance stance towards corruption.

In 2020, there were zero reported incidents of corruption. In addition, no legal cases regarding corruption were brought against the Group or its subsidiaries, and no contracts with business partners had to be terminated due to violations related to corruption.

Over the years, we actively educate our employees on fraud-related risk management, including how to address issues related to corruption, asset misappropriation and accounting fraud. In 2020, our compliance training was transitioned online to accommodate extended WFH arrangements, and is expected to continue into 2021. As usual, during orientation, new employees are introduced to SML's core values, including the Code of Conduct, the Whistle-Blowing Policy which helps provide additional monitoring on misconduct, and other policies covering procurement and fair employment practices.

Recently, we have set out to strengthen our governance framework to incorporate issues of the environment, as well as health and safety. We also continue to build on our policies governing procurement activities and in 2020, we engaged with key suppliers and contractors to prioritise the use of certified green materials in our projects.

As a responsible operator, we proactively engage with governments whenever we felt that there are gaps in current regulations. For example, in 2020 we lobbied to the local government on solid waste management related regulation, a topic that remains under discussion.

We are pleased to report that in 2020, there were:



reported cases of non-compliance concerning health and safety impacts of SML's product and services

0

reported cases of non-compliance concerning all relevant social and economic laws and regulations

significant fines or non-monetary sanctions that were imposed on SML

⁵ Please refer to our previous reports for past awards

BEST IN Class Real Estate

Environmental Compliance

Given our size and scale, we are subjected to the government's most stringent environmental regulatory frameworks in the country. Complying with Government Regulation No. 27 in 2012 on Environment Control Permits, we are required to submit an extensive Environment Management and Monitoring Effort (UKL/UPL) report every six months, indicating specific environmental impacts, such as water and waste, to ensure we operate within allowed thresholds. Reports are submitted to the regional government and subject to their approval.

We are also required to comply with several health, safety and environment regulations, such as those pertaining to liquid waste management, fire safety certification and equipment licencing. Permits are only issued upon satisfactory audit results showing compliance with these requirements.

This year, we are pleased to share that there were no incidents of environmental non-compliance during the reporting period.

Below are some highlights of our initiatives to provide the best services and facilities to our communities in 2020:

LOCAL COMMUNITY PROGRAMS

Clean Water Facilities Deltamas

SML is committed in ensuring the availability of clean water facilities for our customers and surrounding communities. Responding to the flood disaster in early January 2020, Kota Deltamas has provided clean water facilities for communities in and surrounding Bekasi Regency.

2 Social Service ITC Group

Social service ITC Group started "Peduli Kemanusiaan" (care for humanity) initiative program. The purpose of this program is to distribute food to communities located around ITC in times of need such as flooding season and the ongoing COVID-19 pandemic.



climate change & the Environment

At Sinarmas Land, we understand the potential impacts climate change can have on Indonesia as a whole and our business. We strive to protect the environment through policies and programs, minimising our impacts while mitigating risks to our operations.

IN THIS SECTION

This section of the report presents our approach to mitigate environmental risks and minimising our contributions to climate change. In doing so, we have identified four key areas of focus:

- Optimising Building Operations to Achieve Clean Environment
- Providing and Maintaining Green Open Space
- Providing and Facilitating Various Type of Public Transportation
- Responsible Waste Management Program

Materials

As one of Indonesia's leading real estate developers, we recognised that all our developments, including buildings, supporting amenities and infrastructures have a significant impact on the environment. In 2020, 5.16 million tonnes of materials were used, including 5.05 million tonnes of steel, compared with 2.76 million tonnes of materials used in 2019⁶. In particular, we saw significant growth in the usage of steel, largely attributed to the construction of Ruko The Icon 5. Concrete and sand markedly decreased as the construction of most development projects commenced in Q3 2020, while Southgate Apartment and Foresta Business Loft 6 reaches the tail end of their development. We continue to use concrete with recycled content and aim to gradually build our internal monitoring capacity to include other consumable materials and their respective consumed quantities in our internal watchlist, and have them reported in subsequent reports. Also, we continue to abide by relevant environmental regulations to promote transparency and accountability in our supply chain.

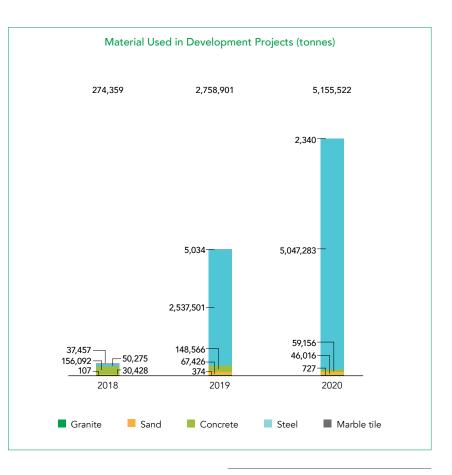
Environmental data for our property management portfolio is categorised into the following groups:

- Green Buildings
- High-Rise Buildings
- Non-Green Buildings
- Retail and Hospitality
- Commercial
- Residential and Township
- Trade Centres (including all ITCs)

OPTIMISING BUILDING OPERATIONS TO ACHIEVE CLEAN ENVIRONMENT

SML strives to optimise building performance from the design and development stage, through to property management, in order to minimise the usage of natural resources.

We continuously seek to develop new ideas and innovate to realise green building potential. In 2019, we embarked on a sustainability program integrated across the organisation to better understand and manage our waste and recycling, energy, water and emissions performance. This year, we improved our data calculation and collection processes from projects, including amount of solid waste, use of building materials and water consumption. These initiatives are expected to provide a more accurate baseline for further efficiency targets.



⁶ Data for 2019 has been revised due to changes in calculation methodology.

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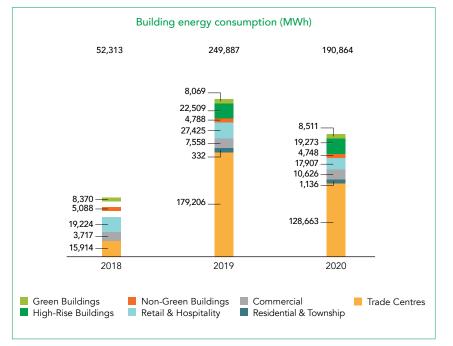
Energy

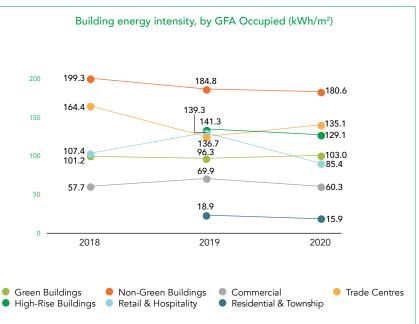
The built-up environment consumes significant amounts of energy. In the region where BSD City is located, energy is predominantly generated from the burning of fossil fuels that contribute significantly to our greenhouse gas emissions. Adhering to internationally recognised green building standards, such as the Singapore BCA Green Mark standard, we can direct our effort towards achieving greater energy efficiency and reducing energy usage throughout the project life cycle. Total energy consumption of buildings decreased overall from 250 million kWh in 2019 to 191 million kWh in 2020. Most of the decrease can be attributed to COVID-19 which caused temporary closures particularly in High-Rise Buildings, Retail and Hospitality, and Trade Centres.

Our building energy consumption and intensity by GFA Occupied are depicted in the adjacent graphs, broken down by building category.⁷

In line with SML's Sustainability Vision, the Group is actively encouraging occupancy in our green office buildings as we seek to reduce environmental footprint, mitigate climate change, and improve the well-being of occupants. Our Green Buildings' GFA increased from 102,157m² in 2019 to 140,644m², while GFA Occupied changed from 83,824 m² in 2019 to 82,629 m² in 2020⁸. Green Buildings' energy consumption increased from 8,069,480 kWh in 2019 to 8,510,789 kWh in 2020. Energy intensity by GFA Occupied increased 7% from 96.27 kWh/m² in 2019 to 103.00 kWh/m², largely driven by the addition of GOP 1 in 2020.9 This is still well below the Energy Consumption Index or 'Indeks Komsumsi Energi' ("IKE") standard stipulated by the Governor of the Capital Region of Jakarta for green office buildings¹⁰.

Since 2019, we set targets for our High-Rise Buildings, namely Sinar Mas Land Plaza – Jakarta and Sinarmas MSIG Tower. Using 2019 as the base year, we began to track and monitor the environmental performance of





- 7 Green and High-Rise Buildings are buildings with targets while other buildings (including Trade Centres) are buildings without targets.
- 8 Note that GFA Occupied figures for years 2019 and 2018, as reported in previous reports, have been revised due to changes in calculation methodology.
- P Energy intensity calculation is based on consumption for partial year for one of the properties, GOP 1, which started operations in 2020 Q2. Therefore, the numerator uses consumption data

from Q2 to Q4, while the denominator includes total GFA Occupied as of end of Q4.

¹⁰ Based on the IKE by the Governor of the Capital Region of Jakarta, the bottom energy consumption intensity limit for green office buildings is 210 kWh/m² / year while the upper limit is 285 kWh/m² / year. Please refer to Indonesian regulation 'PERGUB DKI NO 38_2012' for more information. our High-Rise Buildings. High-Rise Buildings' energy consumption was 19,273,138 kWh.¹¹ Energy intensity by GFA Occupied was 129.13 kWh/m².

Trade Centres experienced the greatest decrease in energy consumption from 179,206,399 kWh in 2019 to 128,663,156 kWh in 2020, largely as a result of closures related to COVID-19. Trade Centres' energy consumption intensity by GFA Occupied decreased slightly from 136.68 kWh/m² in 2019 to 135.12 kWh/ m² in 2020.

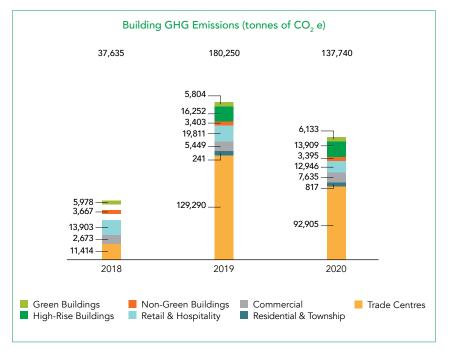
In 2017, Sinar Mas Land Plaza – Jakarta replaced its chiller to optimise the airconditioning system to one with lower energy consumption. This initiative was in line with Singapore BCA Green Mark's requirements and the building was subsequently awarded green building certification in 2018. In 2020, we made improvement to Sinarmas MSIG Tower's chiller plant on Floor LG to optimise the chiller water pump.

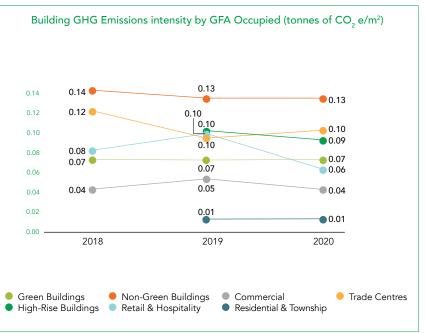
Emissions

In 2020, GHG emissions from all buildings included in this report have decreased, correlated with temporary closures in properties in High-Rise Buildings, Retail & Hospitality, and Trade Centres. Our buildings' GHG emissions and emission intensities by GFA Occupied are depicted in the adjacent graph and tables¹².

In 2020, GHG emissions for our Green Buildings increased from 5,804 tonnes of CO₂ e in 2019 to 6,133 tonnes of CO₂ e in 2020. Green buildings' overall GHG emissions intensity by GFA Occupied increased slightly from 0.069 tonnes of CO₂ e/m² in 2019 to 0.074 tonnes of CO₂ e/m² in 2020.¹³

Since 2019, we have set new targets for our High-Rise Buildings, namely Sinar Mas Land Plaza – Jakarta and Sinarmas MSIG Tower. Using 2019 as the base year, we began to track and monitor the environmental performances of our High-Rise Buildings. High-Rise Buildings' GHG emissions was 13,909 tonnes of $CO_2 e$. Emissions intensity by GFA Occupied was 0.093 tonnes of $CO_2 e/m^2$.





Trade Centres experienced the highest decrease in GHG emissions and intensity by GFA Occupied: Trade Centres' GHG emissions decreased from 129,290 tonnes of CO_2 e in 2019 to 92,905 tonnes of CO_2 e in 2020. Overall GHG emissions intensity by GFA Occupied for Trade Centres decreased from 0.099 tonnes of CO_2 e/m² in 2019 to 0.098 tonnes of CO_2 e/m² in 2020.

- 11 Energy consumption for 2019 has also been revised due to changes in calculation methodology (only for High-Rise Buildings)
- 12 Emission intensity data for 2019 has been revised due to changes in calculation methodology
- ¹³ Emissions intensity calculation is based on consumption for partial year for one of the properties, GOP 1, which started operations in 2020 Q2. Therefore, the numerator uses emissions data from Q2 to Q4, while the denominator includes total GFA Occupied as of end of Q4.

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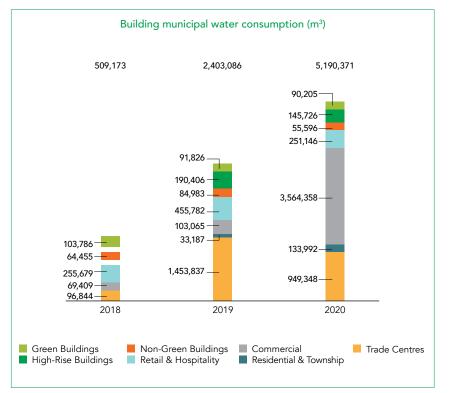
Non-GHG Emissions

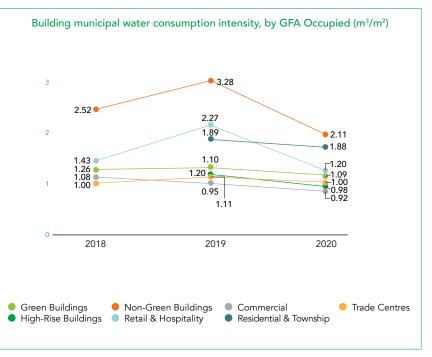
The air-conditioning systems installed in all of our new buildings in BSD City use refrigerants that do not produce any Ozone Depleting Substances ("ODS"). Hence, we are pleased to report that none of our buildings produce any ODS.

Water

Water is a precious resource. Thus, we need to monitor our usage carefully to mitigate the harmful effects of excessive water consumption. Our buildings' main water consumption source is the municipal water supply. Our total municipal water consumption increased, primarily driven by the expanded scope of reporting for the Commercial category. Our buildings' water consumption and consumption intensities by GFA Occupied are depicted in the following graph and tables¹⁴. Municipal water consumption for our Green Buildings decreased from 91,826 m³ in 2019 to 90,205 m³ in 2020, contributing to a slight decrease in water intensity by GFA Occupied from 1.10 m³/m² in 2019 to 1.09 m³/m² in 2020.15

Starting from 2019, we have set new targets for our High-Rise Buildings, namely Sinar Mas Land Plaza – Jakarta and Sinarmas MSIG Tower. Using 2019 as the base year, we began to track and monitor the environmental performances of our High-Rise Buildings. High-Rise Buildings' municipal water consumption was 145,726 m³, corresponding to municipal water intensity by GFA Occupied of 0.98 m³/m². Commercial buildings experienced the highest increase in municipal water consumption and intensity by GFA Occupied due to the significant increase in scope: Commercials' GFA Occupied increased from 108,077 m² in 2019 to 176,121 m² in 2020. As a result, its municipal water consumption increased from 103,065 m³ in 2019 to 3,564,358 m³ in 2020¹⁶.





- 14 Water consumption and intensity for 2019 has been revised due to changes in calculation methodology
- ¹⁵ Water consumption intensity calculation is based on consumption for partial year for one of the properties, GOP 1, which started operations in 2020 Q2. Therefore,

the numerator uses consumption data from Q2 to Q4, while the denominator includes total GFA Occupied as of end of Q4.

¹⁶ Municipal water consumption figure for 2020 includes data on Kawasan Kota Deltamas. Given it is a township, there is no data on GFA Occupied and is not included in 176,121 m². Two of our Green Buildings, MyRepublic Plaza and GOP 1, use collected rainwater¹⁷. Total consumption of rain water across buildings was 1,660 m³ in 2020 (2019: 1,746 m³). Two other Green Buildings, GOP 9 and Sinar Mas Land Plaza – BSD City, are still implementing this system. The collected rainwater is used for gardening activities and flushing of toilets. Through the usage of collected rainwater, we aim to reduce our municipal water footprint, which is critical in water-stressed Jakarta.

We also have systems in place to reuse and recycle used water which is collected from sinks, ablution taps, showers, and air-conditioning systems. Consumption of recycled and reused water decreased modestly from 543,081 m³ in 2019 to 526,401 m³ in 2020. The percentage of recycled and used water from total water usage also decreased from 22% in 2019 to 10% in 2020.

Meanwhile, our consumption of surface water is subjected to strict environmental impact assessments, and it has been found there are no adverse effects on our stakeholders or on local and downstream biodiversity arising from our water use.

	2019	2020
Water recycled and reused in buildings	543,081	526,401
% of water recycled and reused (compared against the total water consumption from all sources)	22%	10%

Building water consumption from all sources ¹⁸ (m ³)	2018	2019	2020
Green Buildings	108,747	93,572	91,865
High-Rise Buildings	N/A	190,406	145,726
Non-Green Buildings	64,455	84,983	55,596
Retail & Hospitality	255,679	445,782	251,146
Commercial	69,409	138,726	3,620,878
Residential & Township	N/A	33,187	133,992
Trade Centres	96,844	1,508,747	981,910

Key Water Initiatives in 2020

Water Initiatives	Savings
Use of recycled water from sinks, ablution taps, showers, and air- conditioning systems	526,401 m ³ equivalent to IDR 6.6 billion (or approximately S\$614,305)
Use of collected rainwater	1,660 m ³ equivalent to IDR 20.9 million (or approximately S\$1,937)

17 Rainwater reported here is not recorded by actual volume captured. These figures are instead based on the GREENSHIP Rating issued by Green Building Council (GBC) Indonesia. The calculation uses average rainfall multiplied by wet days in one year (derived from data provided by the meteorological agency), divided by the total catchment area across all three buildings.

¹⁸ Includes municipal water, rain water, and ground water.

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PROVIDING AND MAINTAINING GREEN OPEN SPACE

Green Open Space (Ruang Terbuka Hijau, "RTH") is incorporated into every new development master plan. RTH are important in order to:

- Ensure the availability of sufficient space for hydrological preservation;
- Serve as pollutant reduction in urban areas; and
- Serve as a recreational and sports facilities for surrounding communities to create a healthy living environment.

There are several areas included in SML's Green Open Space category:

- City Park and Pond Area;
- Public Green Area;
 Commercial Lot Green
- Commercial Lot Green area;
- Residential Green Area;
- Road Median; andRiver Side Green (RSS).

In 2019, we have set and started a 3-year target of planting 31,803 trees and 17,916 biopori holes. In 2020, we have included tree planting and biopori program in our development and have since planted 7,012 new trees and created 1,143 biopori holes.

Our progress in 2020 was slowed down due to the ongoing COVID-19 pandemic. We will review these targets again in 2021.

PROVIDING AND FACILITATING VARIOUS TYPES OF PUBLIC TRANSPORTATION

In order for Jakarta to improve local air quality and reduce GHG emission contributions, it is important to promote the use of the city's public transportation infrastructure. SML aspires to support the city to become a model sustainable city by contributing to the development of public transportation infrastructure.



CASE STUDY INTERMODA BSD CITY

Intermoda BSD City is a commercial multipurpose development on a land area of 25 hectares integrated with public service facilities such as Commuter Line Electric Train (KRL) in Cisauk Station, BSD Link Bus Terminal and trade services through the BSD City Intermoda Modern Market for BSD City residents. The main purpose of Intermoda BSD City development is to provide better access and mobility for residents in and out of BSD City through convenient public transportation to/from BSD City. Intermoda BSD City also promotes the opening of new job opportunities, especially for MSMEs, which in turn will improve the economic condition of local community.

Intermoda BSD City Phase 1, consisting of the bus terminal and the Modern Market connected to Cisauk KRL Station, has been completed and fully operational. The plan for the next phase is to develop commercial buildings/lofts and highrise residential. The overall project will create an urban area that provides easy access to the business district, entertainment centre, modern market, and transportation access. This project was built with the "Green and Modern Transit-Oriented Development (TOD)" concept, a city planning concept that centres on the optimal use of public transport transit areas. TOD is a common concept adopted by many big cities to optimise the use of public transportation modes and to reduce the use of private vehicles hereby achieving lower emission level.

The Modern Market Building is part of Intermoda BSD City that carries the concept of energy-saving with natural lighting and ventilation, supported by high roof to improve air exchange circulation that is comfortable for visitors, resulting in lesser usage of air-conditioning.



Modern Market Intermoda





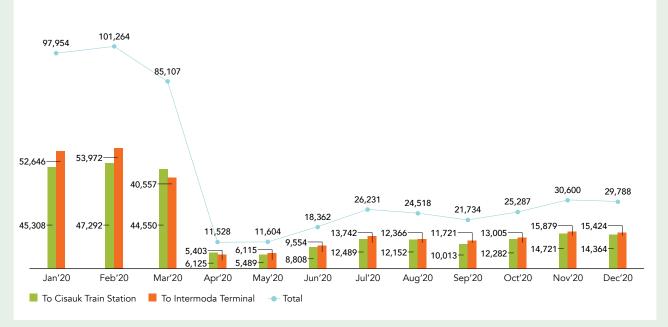
Sky Bridge Intermoda



Intermoda bus terminal

Modern Market Intermoda





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RESPONSIBLE WASTE MANAGEMENT PROGRAM

Sustainable cities require effective waste management practices. As a property developer and estate management manager, we have a significant role to play in minimising our waste and encouraging our tenants and residents to do the same. Currently, there are several ongoing initiatives, including:

- Government engagement: Coordinate with local government authorities to encourage better waste collection;
- Resident engagement: Partner with Indonesia's Tzu Chi Foundation to promote the concepts of plastic usage reduction for all BSD City's residential areas;
- Contractor support: Appoint certified hazardous waste vendors to collect and manage all hazardous waste generated by buildings managed by SML.

Effluents and Waste

We placed all our property management projects into the same group to better manage and monitor the water discharge. Most of BSD City's water discharge is channelled into our Water Treatment Plant (WTP) where it is treated and redistributed back to our customers. A very small portion of our effluents is discharged into the surrounding Cisadene River, which was found not to be significantly affected by the discharge. We target to comply with all relevant government regulations on waste and water discharged.

Please find the following statistics on water discharge by destination from our buildings in scope. Figures in the following table are analysed based on data collected from buildings with on-site meters as well as estimations for buildings where we utilised assumptions which is further detailed in the appendix.

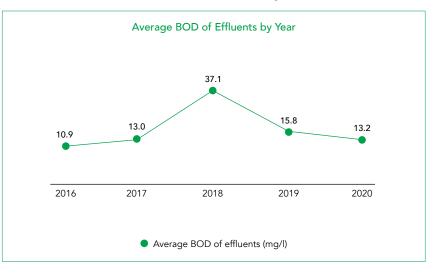
- ¹⁹ Figures for 2019 have been updated due to changes in calculation methodology.
- ²⁰ Figures for 2019 have been updated due to changes in calculation methodology.

Water Discharge from Buildings by Destination	2019 ¹⁹	2020
Discharged into surface water bodies - rivers, lakes, reservoirs (m³)	252,627	187,881
Discharged into external sewage systems or treatment facilities	1,532,787	2,206,699
Total water discharged (m³)	1,785,414	2,394,580

We regret to report that the biochemical oxygen demand ("BOD") of our effluents exceeded the limit as stipulated by the Indonesian government on 6 occasions in 2020, compared to 13 occasions in 2019. The average BOD of effluents was 13.2 mg/l in 2020, compared to 15.8 mg/l in 2019²⁰. The Indonesian national standard for effluents is a maximum of 30mg/l BOD. Our exceedances were minor and did not affect any local water bodies and its related habitat. While these minor exceedances did not result in any penalisation or fines by the government, we take such matters very seriously. These incidents occurred namely due to issues relating to breakdowns in the equalising panel and blower pump panel at QBig, and poor air circulation at The Breeze. This matter will be resolved in 2021 and closely monitored by management.

We practice waste segregation in our developments and pay special attention to ensure that no hazardous waste is sent to landfill. Since 2019, we have had a policy to ensure that every building under Asset Management and Retail & Hospitality Group Division shall appoint a certified waste management vendor to collect and manage our hazardous waste. In 2020, we improved our data collection measures to improve our hazardous waste management. Our properties across Office²¹, Retail & Hospitality, and Trade Centres generated 6,832 tonnes of hazardous waste²² in 2020, compared with 16,457 tonnes reported in 2019.

Sinarmas MSIG Tower stored 1,754 kg of hazardous waste in safe on-site facilities. The building is in the process of appointing certified vendors to collect and manage its hazardous waste.



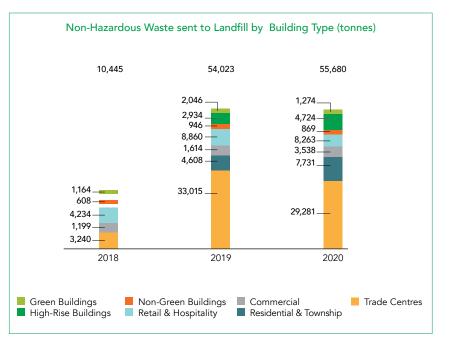
²¹ Comprising sub-categories of Green, High-Rise, and Non-Green Buildings

22 Represents total waste collected by a certified vendor (excluding hazardous waste left uncollected from premises, which, for this year, is limited to Sinarmas MSIG Tower)

Av Building Type	Average BOI (mg		Building Type	No. of times local regulation limits for BOD exceeded	
	2019	2020		2019	2020
Green Buildings	15.9	12.2	Green Buildings	-	-
High-Rise Buildings	10.5	8.5	High-Rise Buildings	-	-
Non-Green Buildings	18.9	11.8	Non-Green Buildings	4	-
Retail & Hospitality	22.9	30.3	Retail & Hospitality	6	3
Commercial	16.3	11.5	Commercial	-	2
Residential & Township	14.3	10.1	Residential & Township	-	-
Trade Centres	11.9	8.2	Trade Centres	3	1
Overall average	15.8	13.2	Total	13	6

(kg)	Office Buildings	Retail & Hospitality	Commercial	Trade Centres
Light Bulbs	851	36	0	2,552
Batteries	374	0	0	994
Chemical/ Liquid	471	945	0	67
Power Supply	0	0	0	0
Ballast	28	0	0	0
Others	48	224	101	141
Total	1,772	1,205	101	3,754

As for non-hazardous waste, apart from increasing the types and amounts of material that can be reused and recycled across our operations, we are using our ongoing communications with local government authorities to suggest improvements to the available infrastructure for the processing of non-hazardous waste, which is currently collected, managed, and sent to landfill. We collect and report data on waste sent to landfill. We show the breakdown of non-hazardous waste sent to landfill by building type in the following chart and table.²³ Waste for the reporting year remained steady at 55,680 tonnes. Trade Centres make up the largest composition contributing 29,281 tonnes, while Residential & Township buildings experienced the largest increase, from 4,608 tonnes in 2019 to 7,731 tonnes in 2020.



²³ Non-hazardous waste data for 2019 has also been revised due to changes in calculation methodology

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LOCAL COMMUNITY PROGRAMS

1 Green Habit 2.0 Less Plastic

In 2019, SML launched Green Habit 2.0 "Less Plastic" program. The program focused on substituting plastic bottles with paper cups/ tumblers in BSD Office Buildings and residential areas. SML has collaborated with Tzu Chi Foundation to collect plastic waste from several residential clusters in BSD City and office buildings such as the Wisma BCA and all the buildings within the Green Office Park. In the first half of 2020, the Green Habit program was successfully implemented in several residential clusters in BSD City, such as Victoria River Park Cluster and Green Cove Cluster. However, the program was subsequently postponed due to the COVID-19 pandemic.



2 BSD Green Festival 2020

Due to the COVID-19 pandemic, the Group held the 17th Green Festival virtually via teleconferencing and social media platforms such as Zoom and Whatsapp in celebration of World Environment Day. During the festival, we engaged local government, sustainability association and environmental activists to share their knowledge through active discussion and online learning.



3 Green Campaign

In 2020, KIIC conducted Green Campaign event, a seed planting activity to increase greenery in the surrounding communities. A total of 21,500 seeds were planted, including vegetable, herbs and greenery seeds.

4 Telaga Desa Agro Enviro Education Park

Designated as a Biological Variety Park spanning over 3 hectares of land near Karawang International Industrial City ("KIIC"), Village Lake ("Telaga Desa") Agro-Enviro Education Park is a centre for research and education in agriculture, environment and ecotourism.

In 2020, we measured the following key performance indicators:

- Eco-tour participants: 1,300 participants
- Training courses conducted: 38
- Visitors studied for biodiversity: 2 SMK (vocational high school) – 16 persons
- Kg of compost produced: 30,000 Kg (30.0 tonnes)
- Seeds produced: Kale, Spinach, Cauliflower, Chili, Cayenne Pepper, Broccoli, Chye Sim.



sustainable *Community*

IN THIS SECTION

Our buildings, developments and projects all form their own communities. We feel that our role is not just to provide physical infrastructure for living and working, but to contribute to the well-being of the people in these communities. Other than being green and innovative, our buildings should also contribute towards a healthy, happy and above all, sustainable community. The following pages provide an insight into our various initiatives contribute to a sustainable community.

Our developments contribute to the well-being of communities through the provision of modern work facilities, safe residential units, valuable commercial buildings and retail centres, local marketplaces for local businesses, accessible public transport and essential services like healthcare and utilities. These facilities support a stable socio-economic environment in these communities. We also acknowledge that construction can be disruptive. Sinarmas Land respects our communities and strive to mitigate any potential negative impacts caused by our activities.

In order to get feedback from our community on how we can continue to serve their well-being as well as mitigate disruptions, we have community engagement initiatives that supplement our customer, tenant and employee surveys, which was mentioned earlier in this report.

We also conduct needs-based community programs such as donation drives, sponsoring local events, contributing to natural disasters relief programs supporting social and environmental campaigns and the development of local worship facilities to contribute to a sustainable and happy community. In this section of the report, we discuss two areas of work we have embarked on in 2020 to help our communities to prosper and thrive:

- Engagement Program for All Stakeholders
- Improving Community Welfare in Surrounding Development Areas

ENGAGEMENT PROGRAM FOR ALL STAKEHOLDERS

Sinarmas Land continuously engages our communities on various fronts to better understand their needs and opinions on new developments or initiatives. We gather feedback to develop products and deliver services of the highest quality to benefit our communities as well as to understand how we can better manage our potentially negative impacts. We also engage with the media for wider engagement with society and other public entities.

Managing Our Impact on Communities

While our continuous development activities contribute to the vibrancy of the local area, certain activities might unfortunately pose some inconvenience to the surrounding communities. As a baseline, we ensure that both our contractors and employees adhere to the legal requirements stipulated by the Indonesian government with regards to traffic, noise and pollution management. As most construction activities are handled by external contractors, we mandate that every contractor appointed or engaged must be rated by the regional regulator and possess a Construction Service Permit Letter issued by the government. In addition, we have included the following initiatives to avoid negative impacts during construction activities:

 Regular communication with the communities surrounding the development project about our construction plans; Mitigate the potentially negative impacts for example reduce noise pollution, reasonable construction hours, keeping the environment clean during construction and many more.

Sinarmas Land comply with Government Regulation No. 27 (2012) on Environment Control Permits that requires every developer to perform an environmental impact assessment (AMDAL) and provide plans to avoid/ mitigate the possibility of negative impacts before the commencement of any property development project in Indonesia. This assessment covers the following areas:

- Physical, chemical (land, soil, space, etc.) and biological aspects (habitats and biodiversity);
- Social factors (economics, safety, culture, etc.);
- Community health.

As a result of precautions taken, based on reports from government regulators and issuance of permits, we are pleased to note that during the reporting period, none of our operations were found to have any significant or potentially negative impacts on local communities.

Engagement with Media

The media is a key platform for SML to communicate with the society and other public entities. Our Corporate Communication Division actively engage with the media to provide the latest information on SML products, services and businesses. These engagements are carried out through exclusive interviews, press releases, press conferences (online and in-person where possible), press tours and media gatherings. During the COVID-19 pandemic, Corporate Communication switched to virtual meetings and interviews as much as possible.



IMPROVING COMMUNITY WELFARE IN SURROUNDING DEVELOPMENT AREA

To support our local community's welfare, we make targeted and strategic investments into local

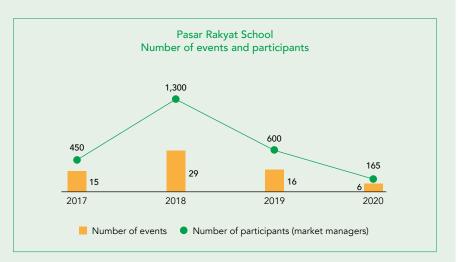
infrastructure and community development. Due to restrictions caused by the COVID-19 pandemic, the school renovation program was dropped. As a replacement, SML will launch a new program called "Bedah Rumah" (House Renovation). Nonetheless, our earlier investments and initiatives continued to provide work opportunities, enhance skills and knowledge for potential talent in communities. Some case studies highlighting this work are:



CASE STUDY PASAR RAKYAT SCHOOL

Pasar Rakyat School is a comprehensive training program for the public market community to improve the sustainability of MSMEs businesses. Targeting market managers and sellers, the program focuses its training towards digital platform and financial management, as well as maintaining a clean and healthy marketplace.

Pasar Rakyat School was initiated in 2017 and conducted at Modern Market BSD City. Over time, this successful program has improved the livelihoods of its participants and is now an acknowledged program by the Indonesia Ministry of Trade. Today, Modern Market BSD City has become a role model for modern market in Indonesia, and the program is rolled



out to many public markets across Indonesia.

There are two types of events in Pasar Rakyat School program:

- Internal events: Conducted and organised by SML, our team share best practices to enhance knowledge of sellers and market managers.
- 2. External events: Accepting invitation from local government and agencies to speak and share good governance practice for modern market in other cities or regions.

The program is conducted and delivered through the following methods:

- i. Training;
- ii. Seminar;
- iii. Workshop;



Invitation from Ministry of Trade



Modern Market BSD semi-virtual event



Modern Market Intermoda onsite event

- iv. Focus Group Discussion ("FGD"); or
- v. Technical assistance or similar type of activities.

There have been 60 related activities over the last 5 years with participation from 16,150 sellers and 165 Market Managers. In 2020, SML collaborated with several partners to organise "Opportunities for MSMEs in the Pandemic Period" event to share the following:

- 1. "Pertamina SME Partnership" by Jakarta Ventura;
- 2. "COVID Who Cares" by Bank Mandiri Syariah; and
- "Socialisation of GS Food Café Tenda Pasar Modern BSD City" by Modern Market Management Team.

To ensure the safety of the participants during COVID-19 pandemic, semivirtually event was conducted with strict health protocol including physical distancing, wearing face mask throughout the event, temperature taking and hand sanitisation before entering the event area.

In addition, SML has also contributed to various local community initiatives in 2020 through the following actions:



LOCAL COMMUNITY PROGRAMS

1 Techpolitan IT Programming Scholarship

Techpolitan IT Programming Scholarship is a coding and programming scholarship program for students who live around BSD City. This initiative helps to support the development of our Digital Hub project and ensuring that students are well-prepared for the growing demand of modern IT job. Due to COVID-19, SML only managed to launch one batch of 14 students in 2020, of which 13 students have graduated and 6 of them have been employed.

Sentra Kriya (Craft Centre) at BSD Knowledge House ("Rumah Pintar")

The Craft Centre conducts activities that focus on improving creativity through lessons such as eco-printing (using natural colour from leaves and flowers) and clothes screen printing (sablon). During pandemic, Craft the COVID-19 Centre organised lesson to teach participants how to make facial masks and hand sanitisers. These lessons and activities taught our participants skillsets that will help ease their financial burden during the pandemic.





sustainable *Community*

3 Pasar Modern (Modern Market) Intermoda

Intermoda modern market was launched in March 2016. Occupying a land area of 2.6 hectares, the doublestorey modern market consists of 539 retail kiosks and 220 stalls. The market is an integrated part of the Intermoda bus terminal and the newly renovated Cisauk train station to support the Transit-Oriented Development ("TOD") area in BSD City.

The traditional marketplace is the breeding ground for local entrepreneurs, particularly those belonging to the MSMEs group. Currently, SML has developed and managed four of these markets: Pasar Modern BSD, Fresh Market Kota Wisata, Pasar Modern Grand Wisata, and Pasar Modern Intermoda BSD City, benefitting more than 3,000 MSMEs. Strict health protocol has been implemented to ensure the health and safety of tenants, customers and visitors during COVID-19 pandemic such as mandatory temperature check at every entrance, wearing of facial mask and increase cleaning and disinfection frequency.



educational *Patronage*

IN THIS SECTION

Educational Patronage is an area in which we place strong emphasis and take a long-term approach. We invest heavily in education for our employees and our surrounding communities. This section of the report provides an overview of the investments SML made to enhance and drive educational development.

educated and self-sufficient An population can drive success both for our nation and for our business. Elevating the level of national education will alleviate poverty and improve livelihoods for the nation as a whole. In addition, a strong education system will provide a stable pipeline of diverse talent for the long-term success of our business. Hence, we are determined to support the education system within our organisation and the surrounding communities.

Internally, we provide various learning opportunities to improve our employees' knowledge and skillsets. We have a set of policies and targets to maintain the quality of our human resources and talents.

Externally, we support learning and knowledge development for our communities in a number of ways. The key objective of these programs is to provide equal opportunity to members of local communities, particularly those who have limited access to develop knowledge and skills to support themselves.

SML provides both educational and financial support, as well as providing infrastructure and learning spaces such as schools and community learning centres.

In 2020, we continued our focus on the following initiatives:

- Initiating Program to Support Knowledge Enhancement
- Improving Educational Method and Facility

INITIATING PROGRAMS TO SUPPORT KNOWLEDGE ENHANCEMENT

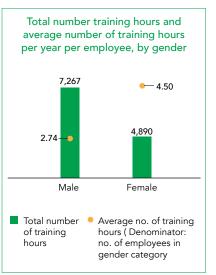
Training and Development

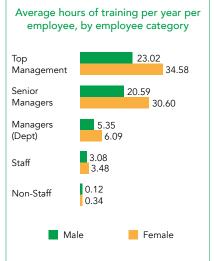
At Sinarmas Land, we operate annual employee training and an professional certification program. This program is fully funded by our annual training budget and consists of specific programs that address our employees' training needs. By equipping our team with the knowledge and skills they need, it will contribute to the growth of their career and our Group. We want to nurture our employees and local talent by providing them with the knowledge and abilities to excel, hereby helping to create a more resilient national workforce. In addition, we provide on-the-job training opportunities and support sufficiently qualified staff by paying for their relevant professional bodies' membership fees, such as chartered engineers.

All SML employees are required to undergo mandatory training specific to their job function as part of their skills enhancement every year. As of 31 December 2020, a total of 12,157 hours of training were conducted for all employees throughout the year. This is an equivalent to an average of 2.74 training hours for our male employees and 4.50 training hours for female employees.

Employee Performance

To keep track of employee training needs, we conduct semi-annual performance and career development reviews. This KPI-based formal review is an important milestone in our employees' career as their performances, strengths and areas evaluated of improvement are transparently and objectively, which will then form the basis for additional training or promotion. Group Division Heads identify and introduce suitable training and development programs to tailor to their division employees' needs based on employees' previous year performances, results and career plans. In 2020, all employees of all genders and employee categories (senior management, executives, and non-executives) received regular performance and career development review.





educational *Patronage*

IMPROVING EDUCATIONAL METHOD AND FACILITY

We developed several programs to support our community educational patronage targets. These include:

- Scholarship collaboration with IULI University for the community in BSD City;
- Scholarship program for employee's children and family; and
- Scholarship program for

communities in Tangerang district and South Tangerang City.

Other than the programs mentioned above, SML is committed to provide essential educational resources and facilities, as well as improving teaching methods. Our 2020 initiatives to improve education in communities are as follows:

 Continuous support for Gerakan Sekolah Menyenangkan ("GSM"), an initiative aimed to change the mindsets of teachers, students and society by equalising and bridging the teaching and knowledge gaps between different schools;

- Organised the second Banten Dyslexia Event to raise the awareness of dyslexic children' needs;
- Conducted renovations for schools and libraries in BSD City and our other area of operations.

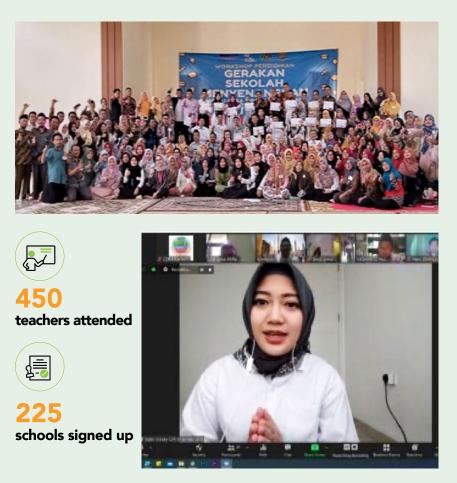
Details of our 2020 initiatives can be found below:



LOCAL COMMUNITY PROGRAMS

Gerakan Sekolah Menyenangkan ("GSM")

GSM'smission is to bridge the gaps anddifferences between schools to share teaching knowledge and resources by changing the preconceived mindset of teachers, students, and ultimately the society. Cooperating with various stakeholders in South Tangerang City and Tangerang District, this program will benefit Primary and Junior School students. During the COVID-19 pandemic, GSM conducted the program virtually and was attended by 450 teachers from 225 different schools. Also, SML and GSM founders were involved in developing an emergency curriculum during the national lockdown. In 2021, the program will be revamped into a new concept, namely Bina Sekolah (School Coaching), and will continue to provide training programs for selected schools.



2 Banten Dyslexia Event 2

Conducted in January 2020, the educational seminar, "Banten Dyslexia Event 2", was attended by 325 participants that consist of teachers, GSM teachers and parents. This seminar provides broad knowledge and insights for teachers and parents to better understand dyslexic children and offer them the same opportunities as other children.



325 participants attended

3 All Centres (excluding Craft Centre) at BSD Knowledge House ("Rumah Pintar")

At our BSD Knowledge house, we provide various facilities to the public that contribute to knowledge and learning in those communities. These include:

- Computer Centre: improves children's ability to use Microsoft operating system and software applications;
- Book Centre: improve children's interest in reading by providing them with an extensive range of books



- Playing Centre (kindergarten): focus on developing and educating children in their early childhood.
- Audio Visual Centre: Using audio and visual tools, the centre focuses on activities such as traditional and modern dance and martial arts (pencak silat)
- Sign language: trainings were conducted to improve the sign language skills for members of the Deaf and Listen Communities in South Tangerang and Tangerang District.

We were pleased to record the number of members and students for

BSD Knowledge House in 2020:

- 2017: 7,513 attendees in 620 trainings/activities
- 2018: 11,299 attendees in 630 trainings/activities
- 2019: 6,923 attendees in 463 trainings/activities
- 2020: 13,667 attendees in 215 interactive trainings/activities

Despite recording fewer trainings/ activities in 2020 due to COVID-19, SML managed to continue the program by conducting the activities virtually and inviting reputable speakers to share several keynotes. In 2020 we also succeeded in launching 378 virtual educational activities through several social media platforms such as Instagram, YouTube, WhatsApp Group and Google Class Room with more than 21,700 views.





Launched **378** virtual educational activities >21,700 views

APPENDIX A: NOTES FOR Sustainability Performance Data

ENVIRONMENT

- Buildings' energy consumption, GHG emissions, and respective intensities data include our use of electricity from the grid and diesel fuel for emergency purposes in our back-up generators. Our processes do not use any heating, cooling, or steam consumption.
- 2. We do not sell any electricity, heating, cooling, or steam energy to other organisations.
- 3. Gross Floor Area ("GFA") for intensity figures: GFA is identified based on the Built Drawing Data and Tenant Relation Data (based on Tenant Agreement).
- All covered floor areas of a building (except otherwise exempted), indoor and basement parking areas, and uncovered areas for commercial uses, are deemed to be the gross floor area of the building.
- We also report our intensity figures on a GFA Occupied basis. GFA Occupied is calculated by multiplying occupancy rate (simple average of monthly occupancy rates) with the GFA.
- Building and development site details including property type, approximate net leasable area, project site area, and expected completion date are available in SML's Annual Report 2020 (Property Portfolio).
- Green Buildings' intensity figures for energy consumption, water consumption and greenhouse gas emissions in 2018 and 2019 were revised due to a correction in GFA and/or GFA Occupied for Sinar Mas Land Plaza - BSD City, MyRepublic Plaza, and GOP 9.
- 8. High-Rise Buildings' energy consumption figure in 2019 was revised due to a correction in consumption data for common area.
- Non-Green Buildings' intensity figures for energy consumption, water consumption, and greenhouse gas emissions in 2019, were revised due to corrections in GFA and GFA Occupied for BSD Permit and Township Office.
- 10. Retail & Hospitality's intensity figures for energy consumption, water consumption, and greenhouse gas emissions in

2018 and 2019 were revised due to corrections in GFA and GFA Occupied for QBig BSD City.

- 11. Residential & Township's intensity figures for energy consumption, water consumption, and greenhouse gas emissions in 2019 were revised due to corrections in GFA and GFA Occupied for BSD Modern Market.
- 12. Commercial's intensity figures for energy consumption, water consumption, and greenhouse gas emissions in 2018 and 2019 were revised due to corrections in GFA and GFA Occupied for The Elements Jakarta and changes in calculation methodology for aggregate across Trade Centres.
- 13. Water consumption and discharge data for Green Buildings in 2018 and 2019, and Commercial in 2019 were revised due to changes in calculation methodology for GOP 9 and Akasa Apartment.
- 14. BOD of effluent data for Green Buildings in 2018, High-Rise Buildings in 2019, and Trade Centres for 2019 were revised due to changes in calculation methodology for Sinar Mas Land Plaza - BSD City, Cashbac, and aggregate across Trade Centres.
- 15. Non-hazardous waste data for Green Buildings in 2019 was revised due to changes in calculation methodology for MyRepublic Plaza.
- 16. Standards and methodologies used for unit conversion of diesel fuel are based on the Carbon Disclosure Project.
- 17. Greenhouse gas conversion is based on the Greenhouse Gas Protocol.
- Emission factors for electricity consumption are sourced from the Standard Pedoman Teknis Perhitungan Baseline Gas Rumah Kaca Sektor Berbasis Energi Republik Indonesia, Area Jamali (Jawa-Madura Bali): 0.725 kg/CO₂/kWh.
- 19. Greenhouse Gas Protocol Émission Factors from Cross Sector Tools, March 2017 were used for diesel conversions. The gases included in the conversion of diesel are CO_2 , CH_4 and N_2O .
- 20. Our water consumption data is based on the standards and methodologies defined by the

Indonesian National Standard and Indonesian regulation for water supply. Calculation of water discharge was performed in the following manner. While 2020's scope expanded, we are aware that not all building has installed on-site meter to measure water discharge due to their designs. The following buildings have onsite meters as of 2020 to measure water discharge:

- Green Buildings: MyRepublic Plaza, GOP 1
- High-Rise Buildings: Sinar Mas Land Plaza - Jakarta Tower II & III
- Non-Green Buildings: Wisma BCA BSD City
- Retail & Hospitality: QBig BSD City
- Commercial: Hotel Le Premier Kota Deltamas, Kawasan Kota Deltamas
- Trade Centres: ITC BSD, BSD Junction, Mall Mangga Dua, ITC Cempaka Mas, ITC Depok, ITC Fatmawati, Graha Cempaka Mas, ITC Roxy Mas, ITC Permata Hijau, ITC Mangga Dua

For buildings without on-site meters, we made estimations on the volume of water discharged. Among the buildings in scope, for Sinar Mas Land Plaza - Jakarta Tower I and Cashbac, we set the volume of water discharged equal to the amount of water consumption.

For the rest of buildings in scope, the volume of water discharged is based on the assumption that volume of water discharge from a building is approximately 80% of water consumption for each building. This methodology is aligned with international standards and the Indonesian government's Ministry of Public Work and Housing. We have applied this methodology to determine the water discharge volume for the following buildings in scope:

- Green Buildings: Sinar Mas Land Plaza - BSD City, GOP 9
- High-Rise Buildings: Sinarmas MSIG Tower

- Non-Green Buildings: Marketing Office BSD City
- Retail & Hospitality: QBig Block G, The Breeze
- Residential & Township: BSD Modern Market, Intermoda Modern Market
- Trade Centres: Mall Ambasador and ITC Kuningan

11 of our buildings in scope use septic tanks — septic tanks are ground tanks collecting waste water from the building without going through the Sewage Treatment Plant ("STP"). The system cannot segregate between solid waste and effluent and it is not common to install meters on these systems. Septic tanks are emptied periodically by authorised vendors and not channelled to the city sewage system or surface water. Hence there are no records of water discharge from the following buildings:

- Non-Green Buildings: Customer Care Office, BSD Permit and Township Office
- Residential & Township: Clubhouse The Avani, Clubhouse The Icon Centro, Clubhouse Vanya Park,

Sportclub Grand Wisata, Sportclub Banjar Wijaya, Sportclub Kota Wisata, Eldorado Waterpark Legenda Wisata, Spa & Swimming Pool Kota Bunga, Kolam Renang Griya Loka

Data from our business Loft buildings are also excluded as these buildings are tenanted; SML only maintains control of the common area.

21. Development projects' environmental performance data includes information on materials used. We currently do not report on energy consumption, water consumption, and waste produced in our development projects.

HEALTH AND SAFETY

- 22. Buildings' health and safety performance data include workplace accidents of employees at building premises.
- 23. Development projects' health and safety performance data include workplace accidents of contractors at project sites.
- 24. Safety performance data for

members of public include accidents of guests, visitors, occupants, tenants, customers, etc. at building premises.

- 25. Rate of recordable work-related injury is defined as the number of workplace accidents for every one million man-hours worked.
- 26. Injury severity rate is defined as the number of man-days lost to workplace accidents for every one million man-hours worked.

PEOPLE

- 27. Data on our employees include the overall employment statistics for our Indonesian operations.
- 28. Scheduled workdays are calculated by 5 days x 52 weeks minus public holidays, annual leave and parental leave.
- 29. There are no significant variations in the total number of our employees. A significant portion of the development projects are performed by our contractors during construction.

Project category	Group division	List of projects	Material Use Data included within this report	OHS Data included within this report
Development	Commercial	Ice Business Park tahap 1 & 2	\checkmark	
	Commercial -	Naraya	\checkmark	
	Deltamas	Woodchester	\checkmark	
	PSS	Foresta Business Loft 6	\checkmark	\checkmark
		Southgate Apartment (1&2)	\checkmark	\checkmark
		Ruko The Icon 5	\checkmark	
	Residential	Aure Amata	\checkmark	
		Savia Park	\checkmark	
		Ruko Savia	~	
		Provence Suites-House	~	

Data boundaries

APPENDIX A: NOTES FOR Sustainability Performance Data

Project category	Group division	List of projects	Material Use Data included within this report	OHS Data included within this report
Development	Residential	Provence Suites-Ruko	\checkmark	
		Caelus	\checkmark	
		Fleekhauz	\checkmark	
		Fleekhauz R	\checkmark	
		Ruko Pasar Modern	\checkmark	
		Ruko CommPark Blok I & J Kota Wisata	\checkmark	

Project	Group	List of projects	Material GRI	Topics		
category	division		Water Data included within this report	Waste Data included within this report	Energy Data included within this report	OHS Data included within this report
Property	Asset	ITC BSD	\checkmark	\checkmark	\checkmark	\checkmark
Management	Management - ITC	BSD Junction	\checkmark	\checkmark	\checkmark	\checkmark
		ITC Cempaka Mas	\checkmark	\checkmark	\checkmark	\checkmark
		ITC Depok	\checkmark	\checkmark	\checkmark	~
		ITC Fatmawati	\checkmark	\checkmark	\checkmark	\checkmark
		ITC Kuningan	~	~	\checkmark	\checkmark
		ITC Roxy Mas	\checkmark	\checkmark	\checkmark	\checkmark
		ITC Permata Hijau	~	\checkmark	\checkmark	\checkmark
		ITC Mangga Dua	\checkmark	\checkmark	\checkmark	\checkmark
		Mall Ambasador	\checkmark	\checkmark	\checkmark	\checkmark
		Mall Mangga Dua	~	~	\checkmark	\checkmark
		Graha Cempaka Mas	~	\checkmark	\checkmark	\checkmark
	Asset Management	Sinar Mas Land Plaza - BSD City	\checkmark	~	~	\checkmark
	- Office	MyRepublic Plaza	\checkmark	\checkmark	\checkmark	\checkmark
		GOP 1	\checkmark	\checkmark	\checkmark	\checkmark
		GOP 9	\checkmark	\checkmark	\checkmark	\checkmark
		Sinar Mas Land Plaza - Jakarta Tower I	\checkmark	~	~	~
		Sinar Mas Land Plaza - Jakarta Tower II & III	\checkmark	~	~	\checkmark
		Cashbac	\checkmark	\checkmark	\checkmark	\checkmark
		Sinarmas MSIG Tower	\checkmark	\checkmark	\checkmark	\checkmark
		Marketing Office BSD City	\checkmark	\checkmark	\checkmark	\checkmark
		Wisma BCA BSD City	\checkmark	\checkmark	\checkmark	\checkmark
		Customer Care Office	\checkmark	\checkmark	\checkmark	\checkmark
		BSD Permit and Township Office	\checkmark	~	\checkmark	\checkmark

Project	Group	List of projects	Material GRI	Topics		
category division			Water Data included within this report	Waste Data included within this report	Energy Data included within this report	OHS Data included within this report
Property	Commercial	Casa De Parco	\checkmark	\checkmark	\checkmark	\checkmark
Management		Saveria	\checkmark	\checkmark	\checkmark	~
		Akasa	\checkmark	\checkmark	\checkmark	
		The Elements	\checkmark	\checkmark	\checkmark	\checkmark
		Foresta Business Loft 1	\checkmark		\checkmark	
		Foresta Business Loft 2	\checkmark		\checkmark	
		Foresta Business Loft 3	~		~	
		Foresta Business Loft 5	\checkmark		\checkmark	
		Foresta Business Signature	~		~	
		Ruko The Icon 1 & 2			~	
		Ruko The Icon 3	\checkmark		\checkmark	
		Hotel Le Premier Kota Deltamas	\checkmark	~	~	
		Deltamas Marketing Office	\checkmark		~	
		Deltamas Sport Center	\checkmark		\checkmark	
		Malibu Club House	\checkmark		\checkmark	
		Kawasan Kota Deltamas	\checkmark	\checkmark		
		Fasilitas GIIC - WTP, WWTP, Security Office, Fire Office	~		~	
	Retail &	QBig BSD City	\checkmark	\checkmark	\checkmark	\checkmark
	Hospitality	QBig Block G	\checkmark	\checkmark	\checkmark	\checkmark
		The Breeze BSD City	~	~	~	\checkmark
	Residential	Club House Avani	~		\checkmark	
		Clubhouse The Icon Centro	\checkmark		~	
		Clubhouse Vanya Park	\checkmark		\checkmark	
		Sport Club - Grand Wisata	~		~	
		Sport Club - Banjar Wijaya	~		\checkmark	
		Sport Club - Kota Wisata	~		\checkmark	
		Eldorado Waterpark - Legenda Wisata	~		~	
		Spa & Swimming Pool - Kota Bunga	~		~	
	Strategic	BSD Modern Market	\checkmark	\checkmark	\checkmark	
	Land Bank - Township	BSD Intermoda	\checkmark	\checkmark	\checkmark	
	Township	Kolam Renang Griya Loka	\checkmark	\checkmark	\checkmark	

APPENDIX A: NOTES FOR Sustainability Performance Data

List of Projects by Building Type

Building type	List of projects
Green Buildings	Sinar Mas Land Plaza - BSD City
	MyRepublic Plaza
	GOP 9
	GOP 1
High-Rise Buildings	Sinarmas MSIG Tower
	Sinar Mas Land Plaza - Jakarta Tower I
	Sinar Mas Land Plaza - Jakarta Tower II & III
	Cashbac
Non-Green Buildings	Marketing Office BSD City
	Wisma BCA BSD City
	Customer Care Office
	BSD Permit and Township Office
Retail & Hospitality	QBig BSD City
	QBig Block G
	The Breeze BSD City
Commercial	Casa De Parco
	Saveria
	Akasa Apartment
	The Elements Jakarta
	Foresta Business Loft 1
	Foresta Business Loft 2
	Foresta Business Loft 3
	Foresta Business Loft 5
	Foresta Business Signature
	Ruko The Icon 1 & 2
	Ruko The Icon 3
	Hotel Le Premier Kota Deltamas
	Deltamas Marketing Office
	Deltamas Sport Centre
	Malibu Club House
	Kawasan Kota Deltamas
	Fasilitas GIIC - WTP, WWTP, Security Office, Fire Office

Building type	List of projects
Residential and Township	Club House Avani
	Clubhouse The Icon Centro
	Clubhouse Vanya Park
	Sport Club - Grand Wisata
	Sport Club - Banjar Wijaya
	Sport Club - Kota Wisata
	Eldorado Waterpark - Legenda Wisata
	Spa & Swimming Pool - Kota Bunga
	BSD Modern Market
	BSD Intermoda
	Kolam Renang Griya Loka
Trade Centres	ITC BSD
	BSD Junction
	ITC Cempaka Mas
	ITC Depok
	ITC Fatmawati
	ITC Kuningan
	ITC Roxy Mas
	ITC Permata Hijau
	ITC Mangga Dua
	Mall Ambasador
	Mall Mangga Dua
	Graha Cempaka Mas

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
ORGANIZATIONAL	102-1 Name of the organization	Back cover
PROFILE	102-2 Activities, brands, products and services	About Sinarmas Land, page 8
	102-3 Location of headquarters	Back cover
	102-4 Location of operations	About Sinarmas Land, page 8
	102-5 Ownership and legal form	About Sinarmas Land, page 8
	102-6 Markets served	About Sinarmas Land, page 8
	102-7 Scale of the organization	About Sinarmas Land, page 8
	102-8 Information on employees and other workers	Best In Class Real Estate > Providing Excellent Facilities and Services > Our Employees, page 22
	102-9 Supply Chain	About Sinarmas Land, page 8
	102-10 Significant changes to the organization (size, structure, ownership) and its supply chain	About Sinarmas Land, page 8
	102-11 Precautionary Principle or Approach	Our Approach > Governance and Risk Management, page 17
	102-12 External initiatives	Our Approach > Sinarmas Land's Sustainability Vision, page 14
	102-13 Membership of assocations	About Sinarmas Land, page 8
STRATEGY	102-14 Statement from senior decision-maker	Chairman and CEO Statement, page 10
ETHICS AND INTEGRITY	102-16 Values, principles, standards and norms of behaviour	Our Approach > Governance and Risk Management, page 17
GOVERNANCE	102-18 Governance structure	Our Approach > Governance and Risk Management, page 17
STAKEHOLDER ENGAGEMENT	102-40 List of stakeholder groups	Our Approach > Materiality and Stakeholder Engagement, page 18
	102-41 Collective bargaining agreements	Best In Class Real Estate > Providing Excellent Facilities and Services > Our Employee > Respecting Freedom of Association and Collective Bargaining Rights, page 24
	102-42 Identifying and selecting stakeholders	Our Approach > Materiality and Stakeholder Engagement, page 18
	102-43 Approach to stakeholder engagement	Our Approach > Materiality and Stakeholder Engagement, page 18
	102-44 Key topics and concerns raised	Our Approach > Materiality and Stakeholder Engagement, page 18 Sustainable Community > Engagement Program for All Stakeholders, page 41

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
REPORTING PRACTICE	102-45 Entitites included in the consolidated financial statements	a. Our Annual Report 2020, page 45 provides an overview of all our main subsidiaries. b. About The Report, page 12
	102-46 Defining report content and topic Boundaries	Our Approach > Materiality and Stakeholder Engagement, page 18
	102-47 List of material topics	Our Approach > Materiality and Stakeholder Engagement, page 18
	102-48 Restatements of information	Appendix A, page 48
	102-49 Changes in reporting	Our Approach > Materiality and Stakeholder Engagement, page 18
	102-50 Reporting period	About The Report, page 12
	102-51 Date of the most recent report	Our third Sustainability Report for FY2019, was published in May 2020. Our previous report can be accessed via this link: https://sinarmasland. com/sustainability
	102-52 Reporting cycle	About The Report, page 12
	102-53 Contact point for questions regarding the report	About The Report, page 12
	102-54 Claims of reporting in accordance with the GRI Standards	About The Report, page 12
	102-55 GRI content index	GRI Content, page 54
	102-56 External assurance	About The Report, page 12
GRI ECONOMIC AND GOVERNANCE STANDARDS		
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Annual Report 2020, page 46 - 65
103: Management Approach	103-2 The management approach and its components	Annual Report 2020, page 46 - 65
103: Management Approach	103-3 Evaluation of the management approach	Annual Report 2020, page 46 - 65
201: Economic Performance	201-1 Direct economic value generated and distributed	Annual Report 2020, page 87 - 94
201: Economic Performance	201-3 Defined benefit plan obligations and other retirement plans	Best In Class Real Estate > Our Employee > Retirement Plans and other Defined Benefits, page 24
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Providing Excellent Facilities and Service > Above the minimum wage, page 24
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Providing Excellent Facilities and Service > Above the minimum wage, page 24

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Providing Excellent Facilities and Service > Above the minimum wage, page 24
202: Market Presence	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Best In Class Real Estate > Providing Excellent Facilities and Service > Above the minimum wage, page 24
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Sustainble Community > In this section, page 41
103: Management Approach	103-2 The management approach and its components	Sustainble Community > In this section, page 41
103: Management Approach	103-3 Evaluation of the management approach	Sustainble Community > In this section, page 41
203: Indirect economic impacts	203-1 infrastructure investments and services supported	Sustainable Community > Improving Community Welfare in Surrounding Development Area, page 42
203: Indirect economic impacts	203-2 Significant indirect economic impacts	Sustainable Community > Improving Community Welfare in Surrounding Development Area, page 42
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Compliance to All Related Regulatory Requirement, page 29
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Compliance to All Related Regulatory Requirement, page 29
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Compliance to All Related Regulatory Requirement, page 29
205: Anti-corruption	205-1 Operations assessed for risks related to corruption	Best In Class Real Estate > Compliance to All Related Regulatory Requirement, page 29
205: Anti-corruption	205-3 Confirmed incidents of corruption and actions taken	Best In Class Real Estate > Compliance to All Related Regulatory Requirement, page 29
GRI ENVIRONMENTAL STANDARDS		
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Materials, page 31
103: Management Approach	103-2 The management approach and its components	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Materials, page 31

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
103: Management Approach	103-3 Evaluation of the management approach	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Materials, page 31
301: Materials	301-1 Materials used by weight or volume	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Materials, page 31
301: Materials	301-2 Recycled input materials used	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Materials, page 31
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Energy, page 32
103: Management Approach	103-2 The management approach and its components	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Energy, page 32
103: Management Approach	103-3 Evaluation of the management approach	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Energy, page 32
302: Energy	302-1 Energy consumption within the organization	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Energy, page 32 Appendix A, page 48
302: Energy	302-2 Energy consumption outside of the organization	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Energy, page 32 Appendix A, page 48
302: Energy	302-3 Energy Intensity	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Energy, page 32 Appendix A, page 48
302: Energy	302-4 Reduction of energy consumption	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Energy, page 32 Appendix A, page 48
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Water, page 34

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
103: Management Approach	103-2 The management approach and its components	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Water, page 34
103: Management Approach	103-3 Evaluation of the management approach	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Water, page 34
303: Water	303-1 Water withdrawal by source	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Water, page 34
303: Water	303-2 Water sources significantly affected by withdrawal of water	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Water, page 34
303: Water	303-3 Water recycled and reused	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Water, page 34
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Emissions, page 33
103: Management Approach	103-2 The management approach and its components	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Emissions, page 33
103: Management Approach	103-3 Evaluation of the management approach	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Emissions, page 33
305: Emissions	305-1 Direct (Scope 1) GHG emissions	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Emissions, page 33
305: Emissions	305-2 Energy indirect (Scope 2) GHG emissions	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Emissions, page 33
305: Emissions	305-4 GHG emissions intensity	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Emissions, page 33
305: Emissions	305-5 Reduction of GHG emissions	Climate Change and the Environment > Optimising Building Operation to Achieve Clean Environment > Emissions, page 33

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Climate Change and the Environment > Responsible Waste Management Program > Effluents and Waste, page 38
103: Management Approach	103-2 The management approach and its components	Climate Change and the Environment > Responsible Waste Management Program > Effluents and Waste, page 38
103: Management Approach	103-3 Evaluation of the management approach	Climate Change and the Environment > Responsible Waste Management Program > Effluents and Waste, page 38
306: Effluents and Waste	306-1 Waste generation and significant waste-related impacts	Climate Change and the Environment > Responsible Waste Management Program > Effluents and Waste, page 38
306: Effluents and Waste	306-2 Management of significant waste-related impacts	Climate Change and the Environment > Responsible Waste Management Program > Effluents and Waste, page 38
306: Effluents and Waste	306-4 Waste diverted from disposal	Climate Change and the Environment > Responsible Waste Management Program> Effluents and Waste, page 38
306: Effluents and Waste	306-5 Waste directed to disposal	Climate Change and the Environment > Responsible Waste Management Program> Effluents and Waste, page 38
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Compliance to All Related Regulatory Requirement > Environmental Compliance, page 30
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Compliance to All Related Regulatory Requirement > Environmental Compliance, page 30
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Compliance to All Related Regulatory Requirement > Environmental Compliance, page 30
307: Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	Best In Class Real Estate > Compliance to All Related Regulatory Requirement > Environmental Compliance, page 30

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
GRI SOCIAL STANDARDS		
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Providing Excellent Facilities and Services, page 21
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Providing Excellent Facilities and Services, page 21
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Providing Excellent Facilities and Services, page 21
401: Employment	401-1 New employee hires and employee turnover	Best In Class Real Estate > Providing Excellent Facilities and Services > New Hires and Employee Retention, page 23
401: Employment	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Best In Class Real Estate > Providing Excellent Facilities and Services > Our Employees, page 22
401: Employment	401-3 Parental leave	Best In Class Real Estate > Providing Excellent Facilities and Services > Benefits and Welfare > Family- friendly Employer, page 24
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Providing Excellent Facilities and Services, page 21
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Providing Excellent Facilities and Services, page 21
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Providing Excellent Facilities and Services, page 21
402: Labour/ management relations	402-1 Minimum notice periods regarding operational changes	The minimum notice period is currently defined by our business needs. We do not have a formal policy on this matter yet, but are considering establishing one.
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-1 Occupational health and safety management systems	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-2 Hazard identification, risk assessment, and incident investigation	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-3 Occupational health services	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-4 Worker participation, consultation, and communication on occupational health and safety	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-5 Worker training on occupational health and safety	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-6 Promotion of worker health	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
403: Occupational Health and Safety (2018)	403-9 Work-related injuries	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Our disciplined approach towards ensuring Occupational Health & Safety, page 28
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Educational Patronage > In This Section, page 47 Educational Patronage > Initiating Program to Support Knowledge Enhancement, page 45

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
103: Management Approach	103-2 The management approach and its components	Educational Patronage > Initiating Program to Support Knowledge Enhancement, page 45
103: Management Approach	103-3 Evaluation of the management approach	Educational Patronage > Initiating Program to Support Knowledge Enhancement, page 45
404: Training and Education	404-1 Average hours of training per year per employee	Educational Patronage > Initiating Program to Support Knowledge Enhancement > Training and Development, page 45
404: Training and Education	404-2 Programs for upgrading employee skills and transition assistance programs	Educational Patronage > Initiating Program to Support Knowledge Enhancement > Training and Development, page 45
404: Training and Education	404-3 Percentage of employees receiving regular performance and career development reviews	Educational Patronage > Initiating Program to Support Knowledge Enhancement > Employee Performance, page 45
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Providing Excelent Facilities and Services > Diversity and Equal Opportunity > page 22
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Providing Excelent Facilities and Services > Diversity and Equal Opportunity > page 22
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Providing Excelent Facilities and Services > Diversity and Equal Opportunity > page 22
405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Best In Class Real Estate > Providing Excelent Facilities and Services > Diversity and Equal Opportunity > page 22
405: Diversity and Equal Opportunity	405-2 Ratio of basic salary and remuneration of women to men	Best In Class Real Estate > Providing Excelent Facilities and Services > Diversity and Equal Opportunity > page 22
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Sustainable Community > In This Section, page 41 Sustainable Community > Improving Community Welfare in Surrounding Development Area, page 42 Educational Patronage > Improving Educational Method and Facility, page 46

GRI Standard	Disclosure number and title	Page number and reasons for omission, if applicable
103: Management Approach	103-2 The management approach and its components	Sustainable Community > Improving Community Welfare in Surrounding Development Area, page 42 Educational Patronage > Improving Educational Method and Facility, page 46
103: Management Approach	103-3 Evaluation of the management approach	Sustainable Community > Improving Community Welfare in Surrounding Development Area, page 42 Educational Patronage > Improving Educational Method and Facility, page 46
413: Local Communities	413-1 Operations with local community engagement, impact assessments and development programs	Sustainable Community > Improving Community Welfare in Surrounding Development Area, page 42 Educational Patronage > Improving Educational Method and Facility, page 46
413: Local Communities	413-2 Operations with significant actual and potential negative impacts on local communities	Sustainable Community > Improving Community Welfare in Surrounding Development Area, page 42 Educational Patronage > Improving Educational Method and Facility, page 46
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Ensuring Customers' and the Public's Well- Being, page 27
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Ensuring Customers' and the Public's Well-Being, page 27
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Ensuring Customers' and the Public's Well-Being, page 27
416: Customer Health and Safety	416-1 Assessment of the health and safety impacts of product and service categories	Best In Class Real Estate > Attention to Customer and Occupational Health & Safety > Ensuring Customers' and the Public's Well-Being, page 27
416: Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29

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103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
417: Marketing and labeling	417-2 Incidents of non-compliance concerning product and service information labelling	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
417: Marketing and labeling	417-3 Incidents of non-compliance concerning marketing communications	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
103: Management Approach	103-1 Explanation of the material topic and its Boundary	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
103: Management Approach	103-2 The management approach and its components	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
103: Management Approach	103-3 Evaluation of the management approach	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29
419: Non- compliance with laws and regulations in the social and economic area	419-1 Non-compliance with laws and regulations in the social and economic area	Best In Class Real Estate > Compliance to All Related Regulatory Requirements, page 29



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