ENTERPRISE RISK MANAGEMENT (ERM) APPROACH

ERM Framework of the SingPost Group ("The Group")

The Group's ERM framework is modelled on the ISO 31000:2018 Risk Management – Principles and Guidelines, and covers the key strategic, operational, financial, compliance, and information technology risks facing SingPost. The ERM framework is supported by appropriate risk policies, procedures and provides guidance to the Group's various business units and support units on managing risks.



ERM FRAMEWORK

RISK GOVERNANCE

The Group's ERM programme and internal controls are reviewed on a regular basis and, where appropriate, refined by Key Management with guidance from the Board Risk and Technology Committee (BRTC) and the Board of Directors (Board).

The Board, through the BRTC, has overall responsibility for risk governance and ensures that Management maintains a robust system of risk management and internal controls to safeguard stakeholders' interests and the company's assets and resources.

In addition, the BRTC sets the tone on the appropriate risk culture and provides guidance on the enterprise risk management system and the corresponding policies and procedures. The BRTC meets quarterly.



The purpose of risk governance is to embed and build on the four lines of defence (as illustrated in the diagram below), which is a prerequisite to promote a robust system of risk management and effective internal controls.



RISK GOVERNANCE STRUCTURE

The adoption of the above four lines of defence develops a risk governance structure. It embeds the Group's existing organisational structure with assigned risk roles and responsibilities.



ERM PROCESS

The ERM process aims to achieve the following:

- A structured, disciplined and systematic approach to managing risks; ٠
- Robustness of risk information; •
- Accountability for outcomes and risk treatment action plans; and •
- Sustainability .





RISK APPETITE STATEMENTS

The Group's risk appetite statement reflects the nature and extent of risks the Group is willing to take in pursuing its strategic objectives. The Board have reviewed the following risk appetite statements during the financial year ended 31 March 2023:

1. STRATEGY

The Group is committed to upholding its reputation as a trusted organisation while placing customers at the core of its business. This will include investments into people, innovation, infrastructure, cyber, and data security to the benefit of all stakeholders.

2. SUSTAINABILITY & GROWTH

The Group aims to strengthen its market position in Singapore and the rest of Asia Pacific by taking measured risks that balances risk and reward in line with its strategic objectives and initiatives. The Group will also proactively seek to diversify its business while actively managing its risks.

FINANCIAL

3.

The Group aims to deliver value to shareholders with sustainable profitable growth. The Group is committed to maintain a strong financial position and targets an investment grade credit rating with adequate liquidity to meet its operational and financing obligations and longer-term goals.

4. PEOPLE & CULTURE

The Group aims to be an employer of choice where it engages, develops, grows, and rewards talent, apart from providing employees and stakeholders a safe and healthy work environment. The Group is committed to complying with laws and regulations of all countries in which it operates, and to conduct business with integrity, fairness and high ethical standards in all business dealings and relationships.

KEY MATERIAL RISKS TO THE GROUP

The Group categorises its risk profile into five key areas: Strategic, Financial, Operational, Compliance, and Information Technology.

STRATEGIC RISKS

A large part of the Group's strategic risks comprises of market-driven forces, evolving business landscapes, changing customer demands, concentration of key customers, disruptive technology, and declining letter volume.

Risk Name	The Group manages by
Concentration (The Group recognises the risk of over-reliance on revenue generated by its business unit and its products.)	 Diversifying transshipment origin, trade lanes and destination countries. Strengthening and optimising a regional transhipment hub to serve our eCommerce customers. Developing and growing our Post and Parcel global transshipment hub to serve eCommerce customers (from Platforms to Brands). Diversifying the Group's income streams to prevent over-reliance on a particular business unit.
Declining Letter Volume (The Group recognises the risk of technological advancements replacing physical letters, this poses a threat to the Group's revenue mix.)	 Focusing on the growth of eCommerce volume to mitigate e-substitution. Seeking basic postage and bulk mail scheme rate revisions. Processing will continue to be automated along with application of smart technologies in infrastructure to enhance efficiency.
Merger & Acquisition (The Group recognises the merger and acquisition (M&A) risk is the risk arising from the process of buying and integrating businesses.)	 Adopting a disciplined investment evaluation and decision process governed by the Group M&A policy. Integrating the acquired businesses as appropriate, to maximise synergies and to ensure compliance with corporate governance requirements. Ensuring more members of our management team to be represented as Board directors and/or management of our acquired businesses. This allows the sharing of commercial experience as well as best practices in corporate governance and reporting.
Market Risk (The Group recognises that the logistics industry is an open and competitive one, with rising costs and increasing expectations for higher service standards. Failure to plan for the constantly evolving competitive landscape and grow required capabilities and networks would limit the Group's growth potential.)	 Developing multiple growth markets to diversify both sources and types of revenue. Using data to analyse market outlook and formulate the enterprise strategy. Establishing cost-efficient cross border hubs. Enhancing our processing and network capacity to meet new demands.





FINANCIAL RISKS

The Group has diversified global businesses, partially funded by external debts in addition to shareholders' funds. This exposes the Group to liquidity risk, interest rate risk, and foreign currency risk. The Group has established policies, guidelines, and control procedures to manage and report exposure to such risks.

Risk Name	The Group manages by
Treasury (The Group's businesses and operations may be exposed to unfavourable movements in foreign exchange rates, interest rates, that may result in potential financial losses.)	 Liquidity Management Monitoring and maintaining a level of cash and cash equivalents to finance operations and to mitigate the effects of fluctuations in cash flows. Maintaining funding flexibility with credit facilities available to meet short-term obligations as they fall due.
	 Interest Rate Reviewing the Group's interest rate exposures on Group's debt obligations and interest-bearing financial assets. Maintaining a prudent mix of fixed and floating interest rates for the outstanding borrowings or debts to manage fluctuations in the interest rate environment. Placing cash balances with reputable banks and financial institutions with different maturities to manage interest income on different interest rate terms.
	 Foreign Currency Constantly reviewing foreign currency exposure from fluctuations arising from the Group's operations and subsidiaries, and associates in foreign countries. Using a hedging framework, matching currencies, and hedging instruments to hedge known exposure from foreign currency exchange rate fluctuations.
Credit Management (The Group recognises that weak credit control management over customers, customers' slow payment or non-payments when customers' accounts receivables are due may result in potential significant bad debts.)	 Credit analysis and robust screening of such customers to ensure credit worthiness. Understanding the risk exposure and applying suitable credit terms. Ensuring strict compliance by all customers to the credit terms with deviations granted only on exceptional basis and in accordance to Accounts Receivable Approval Matrix. Escalating to Group Chief Financial Officer on monthly and quarterly basis, customers' whose accounts receivable are overdue. Having a Trade Credit Insurance policy in place to insure for high valued customers.

OPERATIONAL RISKS

The Group's operations are exposed to a variety of operational risks relating to workplace safety and health, talent retention and with the increased reliance on information systems and technology as a business enabler, a service disruption of critical information technology (IT) systems or malicious and deliberate attempt of hackers to breach our IT systems could adversely affect the Group's business continuity and reputation.

Risk Name	The Group manages by
Workplace Safety and Health (The Group recognises the importance of taking reasonably practicable safety and health measures at its workplaces to prevent severe injury or death of staff and/or customers.)	 Establishing a Workplace Safety and Health (WSH) committee to review workplace safety and health performance of each business and support units. Collecting and reviewing observations and incident data, near misses; investigating incidents and mapping action plans for improvements and prevention. Conducting safety awareness workshops across for all operational employees. Conducting WSH inspection at all workplaces to identify hazards and ensure compliance to WSH Act and relevant regulations.
Talent Retention (The Group recognises the importance of retaining personnel with key institutional knowledge, information, experience, skills, and connections for key positions in the SingPost management group to ensure operational effectiveness and business sustainability.)	 Robust approach to talent identification, assessment and development allows the Group to have a holistic organisational view of our talent pipelines and bench strength. The identified pool of talent is offered accelerated development opportunities that include formal learning, coaching and mentoring as well as action learning projects to enhance their skills and competencies and prepare them to successfully take on the challenges of the future. Succession Planning for key executive and critical roles identified across the business, allows the Group to be aware of and systematically mitigate any short term or long-term risks arising from potential unavailability of talent so that appropriate steps to recruit or accelerate development of the Group's internal talent may be taken. This annual exercise, conducted jointly with the talent identification and assessment process, is with the involvement of the Management team as well as Board Committee. In line with the Group's pay-for-performance philosophy, we adopt pay differentiation where the top performers receive a larger pay-out accordingly. Top performers and critical talents are also eligible for SingPost long term incentives.
Business Continuity (The Group recognises the importance and the need to recover from a business/ operational disruption quickly to minimise impact to our customers, operations and assets.)	 Establishing Business Continuity Management Council structure with Business Continuity Management (BCM) Framework to drive the business continuity plan (BCP) efforts from top down. Continuously reviewing and monitoring the effectiveness of the BCP via annual testing of the BCPs.
IT Security (The Group recognises that cyber threats remain a key concern as attackers become increasingly creative with attack methods and may result in significant data losses.)	 Maintaining an IT security framework to address evolving IT security threats such as hacking, malware, and loss of data. Dedicated IT security expertise to keep abreast on the latest developments, innovation, and threats in technology, and assessing their risks and impact.
Critical IT Systems Failure (The Group recognises that unplanned outage/ downtime and/or performance deficiency of Critical IT systems may lead to negative customer experience, disruption to major operations, and/or regulatory actions or fines by the regulators.)	 Conducting periodic disaster recovery testing on all critical IT systems. Ensuring that IT servers are centrally and continuously monitored with appropriate escalations to be performed on any critical IT systems failure. Monitoring mechanisms to mitigate poor performing critical systems.



COMPLIANCE RISKS

The Group's business operations are exposed to a variety of compliance risks relating to postal regulation and associated government regulations.

Risk Name	The Group manages by
Data Privacy (The Group recognises that data privacy breaches may undermine customer confidence and may result in litigation from customers and/ or subject to regulatory fines and penalties.)	 Maintaining an accountability-based data privacy framework to work in conjunction with the IT security framework to safeguard personal data collected, processed, and disclosed. Maintaining governance structure to ensure oversight is provided by the group management and the board on the adequacy of the Group's privacy programme and control measures. Developing and implementing data privacy focused policies and procedures group wide. Examples are – handling of privacy incidents and personal data breaches, data subject access rights, classification of personal data. Conducting regular mandatory trainings to all employees on the Group's data privacy framework and associated policies and procedures to create awareness and compliance. Assigning clear line of accountability to all privacy liaison officers at Business Units (BUs) and Support Units (SUs) level to assist in the maintaining of data privacy and personal data procedures and procedures.
Governance (Fraud, Bribery and Corruption) (The Group recognises that fraud, bribery and corrupt acts committed by employees/officers and non-compliance with internal governance/ Standard Operating Procedures, may result in financial loss and/or reputation damage to the Group.)	 Maintaining a zero-tolerance policy and "tone from the top" towards fraud, bribery, and corruption. Reviewing internal controls periodically and conducting trainings and awareness activities. Mandating all staff to undergo the annual Code of Conduct declaration exercise where the anti-bribery and anti-corruption requirements are spelt out for compliance and affirmation. Maintaining whistle-blowing escalation process where SingPost Group Internal Audit manage and investigate whistleblowing incidents and all whistle-blowing reports received are reported to SingPost Audit Committee on a quarterly basis. Embedding the Code of Ethics into the Code of Conduct policy (owned by HR) to give emphasis on ethical behaviour and integrity of individual employee. Maintaining a dedicated Ethics Committee at Management level to evaluate staff issues or concerns of an ethical nature, reviewing remediation and strengthening processes.
Payment Services Act ("PSA") (The Group is required to meet regulatory requirements for offering payment services under the PSA and notices and guidelines released by the Monetary Authority of Singapore. Non-compliance with the above may result in financial penalties or in the worst case, a suspension of the licence resulting in stoppage of the business.)	 Developing and implementing relevant policies and procedures. Examples are – Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) as required, safeguarding requirements, issuance of receipts, etc. Maintaining a checklist and ensuring that all products and services offered or to be offered by the Group will adhere to the PSA regulation. Conducting training to all employees on the PSA regulation and associated policies and procedures to create awareness and compliance. Monitoring and assessing the impact of PSA and the changes of the PSA regulation to minimise impact to the business.

Risk Name	The Group manages by
Sanctions (The Group recognises that violations of trade compliance laws and regulations, including sanctions and embargoes, will carry fines and expose the Group and its employees to criminal sanctions and civil suits.)	 Monitoring and tracking the developments of significant sanctions issued by international organisations (e.g. United Nations) as well as unilateral sanctions issued by countries/jurisdictions such as United States of America and the European Union. Creating a continual awareness on the latest developments and requirements via monthly and ad-hoc email circulars to the various Business Units (BU) and Support Units (SU). Establishing an escalation channel for BUs and SUs to flag any suspicious or high-risk transaction to Group Compliance for review and assessment and screen the associated parties against sanction lists/databases. Establishing the Third-Party Due Diligence policy to guide all employees on the required measures and process when engaging third parties. Monitoring and reviewing adequacy of resources for managing sanction risk to align with the evolving businesses and regulatory environment.
Postal Regulatory (The Postal Service is required to meet Quality of Service (QoS) standards for basic letters delivery services set by the Infocomm Media Development Authority (IMDA). IMDA's Postal QoS framework is one of the most stringent in the world. The Postal Service is required to comply with the Postal Services Act, Postal Licence conditions, Postal Competition Code, Postal Services Regulations, Postal Services Operations Code including any Directions and Guidelines issued by the IMDA. Non-compliance with the above may result in the imposition of financial penalties.)	 Having proactive and regular engagements with the Postal Regulator, IMDA and other government agencies. Conducting internal communications campaigns to train, educate and reinforce best behaviour. Sending regular reminders to frontliners to comply with established protocols, guidelines, best practices, and directions, enhanced by strict disciplinary action taken for non-compliance. Continually monitoring and assessing the impact of Postal Regulatory developments as the business evolves to minimise impact to the business.

