



STARHUB

StarHub Ltd

Climate Transition Plan 2025



Table of Contents

Introduction	3
Climate Ambition & Governance	4
Strategy Integration & Business Innovation	5
Climate Risk, Opportunity & Scenario Analysis	6
Decarbonisation Across Operations & Value Chain	6
Targets and Performance Tracking	7
Review and External Assurance	10

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Introduction

About this report

The information presented in the 2025 Climate Transition Plan (the “Plan”) supplements StarHub’s sustainability disclosure from 1 January to 31 December 2024 (FY2024), while documenting our journey towards a sustainable and climate resilient future.

StarHub is committed to creating a better world enabled by more sustainable and innovative solutions, while managing our environmental and carbon footprint. Our goal of achieving net-zero by 2050 signifies our commitment to eliminate greenhouse gas (GHG) emissions from our operations and value chains. The consequences of inaction can and will impact both our company as well as our stakeholders.

In developing the Plan, we have outlined our roadmap towards decarbonisation. This includes Board- and management-level oversight on climate-related matters, executive accountability, and incentives tied to climate performance, among others. Our overall business strategy is informed by our net-zero commitment, critical to meeting the 1.5°C target and avoiding the worst impacts of climate change. The Plan also documents the climate scenario analysis we conduct, low-carbon products and initiatives across our value chain, and alignment of our climate ambition with public policies. Hence in FY2023, we established science-based emissions reduction targets, alongside other climate-related and net-zero targets, which will be disclosed as part of our comprehensive Scope 1, 2, and selected Scope 3 emissions metrics verified by third parties.

Reporting framework

This report is prepared with guidance from the [CDP Technical Note: Reporting on Climate Transition Plans](#). StarHub continues to participate in the 2025 CDP Climate Change Questionnaire and report with reference to International Financial Reporting Standards (IFRS) S2 (climate-related disclosures), which have integrated the Task Force on Climate-related Financial Disclosures’ (TCFD) recommendations.

Feedback

We welcome feedback on the Plan and all aspects of our sustainability performance. Please direct any comments to StarHub Group Sustainability at sustainability@starhub.com.

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Climate Ambition & Governance

Climate Commitment

In FY2025, we are proud to be named the **World's Most Sustainable Wireless Telecommunication Service Provider** in the Corporate Knights Global 100 rankings. We achieved a **"B" Management Score** for our 2024 CDP Climate Change disclosure. On the back of this recognition and driving forward our steadfast support for the Paris Agreement and the Singapore Green Plan 2030, we remained focused on our decarbonisation efforts and support of the global race to net-zero.

Our climate strategy is anchored on one of our four main sustainability framework pillars, **Sustainable Business & Growth**. Since FY2023 when the Board approved **near- and long-term net-zero targets** aligned with the 1.5°C target pathway and **validated by the Science Based Targets initiative**, we have progressively developed a decarbonisation roadmap with defined interim milestones.

Details of our sustainability framework, approved targets, and roadmap are available in our [Annual Report 2024, pages 72 and 84-85](#)

Governance

Board Oversight, Accountability and Feedback Mechanism

At StarHub, our sustainability governance structure comprises of the **Board, Risk & Sustainability Committee (RSC), Management Risk Committee (MRC) and Sustainability Advocates** who champion and collaborate on Sustainability matters across divisions. We have also established channels for stakeholders to raise sustainability-related concerns or provide feedback. Enquiries and input may be directed to our dedicated sustainability email, as listed in the feedback section. In addition, our whistleblowing channel, open to all, provides a secure and confidential avenue to report potential irregularities or misconduct, anonymously or otherwise, reinforcing our commitment to strong governance and accountability.

Board Expertise on Climate-related Issues

Sustainability is a dynamic, multidisciplinary area that continues to evolve alongside new reporting standards and practices. To effectively assess the wide-ranging dimensions, perspectives, and risks associated with sustainability, diverse expertise is essential. The Board pursues ongoing professional development to strengthen oversight and strategic guidance on emerging risks topics, including cybersecurity, geopolitical developments, artificial intelligence, and Sustainability matters.

Leadership Incentives

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Our sustainability performance is linked to leadership incentives through the Organisation Development and Compensation Committee (ODCC), which oversees executive remuneration and sustainability-linked KPIs. In FY2024, two sustainability-linked KPIs were incorporated.

Details of our sustainability governance structure, board expertise on climate-related issues, and sustainability-linked KPIs can be found in our [Annual Report 2024, pages 73 – 74](#)

Strategy Integration & Business Innovation

Climate Strategy Integration

At StarHub, we commenced identifying and analysing climate-related risks and opportunities through our climate scenario analysis conducted in FY2021. Since then, preliminary results have informed our corporate strategy and have directly shaped the development and execution of our Climate Transition Plan.

StarHub continues to advance sustainability through both our **products and services** and **investment in research and development (R&D)**. In products and services, growing demand for sustainable solutions has driven the expansion of our Green Tech offerings (i.e., low-carbon products and services), leveraging 5G, Internet of Things (IoT), data analytics, and multi-cloud capabilities to help enterprise customers optimise resource use. In R&D, climate considerations guide innovation in smart and sustainable technologies, including solutions that enhance campus connectivity and city infrastructure.

In our **value chain**, the risk of diminished customer perception and its potential impact on long-term revenue has shaped our supplier engagement strategy. We have commenced a comprehensive assessment of our supply chain management maturity to inform a roadmap for decarbonising supplier operations and strengthening resilience across our upstream and downstream partners.

Across our **operations**, we have made operational decarbonisation a strategic priority, with a focus on improving energy efficiency, optimising infrastructure, and deploying innovative power-saving technologies. The implementation and results of these measures are outlined in the operational decarbonisation section.

These strategic responses demonstrate our commitment to integrating climate-related risks and opportunities across all facets of our business, ensuring StarHub remains future-ready and resilient in a low-carbon economy.

Details of our low-carbon products and services, as well as investments in R&D is outlined in our [Annual Report 2024, pages 51–52, and 92–93](#)

Policy Alignment

StarHub recognises that achieving a successful climate transition in line with the 1.5°C target requires a supportive and coherent external policy environment. Our Plan is designed to be

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consistent with progressive public policies, regulations, and industry practices while remaining practical in driving sustainable outcomes within the telecommunications and digital services sectors.

As a leading homegrown Singapore company, StarHub has been engaging with key regulators to ensure our climate strategy remains aligned with Singapore's national agenda on sustainable development and climate disclosure requirements. At the same time, we collaborate closely with industry peers and partners through trade associations and alliances to advocate for climate-positive policies, support the low-carbon transition, and advance transparency in sustainability reporting.

Details of our memberships, associations, and our signatory to the Action Declaration on Climate Policy Engagement can be found in our [Annual Report 2024, page 129](#)

Climate Risk, Opportunity & Scenario Analysis

Environmental and climate-related risks are managed as part of StarHub's Enterprise Risk Management (ERM) framework, alongside key risks in areas such as operations, technology and security, market dynamics, compliance, and workforce. The ERM framework is a multidisciplinary, integrative programme that identifies and manages risks and opportunities relevant to our business and aligned with our strategic objectives. The RSC adopts a holistic, precautionary approach to assessing climate-related risks and opportunities, in line with the ERM framework. Risks and opportunities with potential material financial or strategic impacts — whether on our direct operations or across the value chain — are evaluated through both top-down and bottom-up assessments. These are guided by considerations such as operational feasibility, commercial viability, potential impact, peer benchmarking, market maturity, the strength of the supporting ecosystem, and forward-looking insights, enabling StarHub to balance synergies and mitigate trade-offs effectively.

Details of our climate-scenario analysis' risks and opportunities can be found in our [Annual Report 2024, pages 87–89](#)

Decarbonisation Across Operations & Value Chain

As informed by the materiality assessment refresh that was conducted in FY2024, climate change and energy remained one of the material ESG topics to StarHub. To drive long-term value creation, we are committed to reducing the overall carbon footprint of our operations, particularly in areas with the highest impact, to future-proof our business. Electricity consumption from our core business functions and network infrastructure accounts for over 90% of our Scope 1 and 2 emissions combined, while Scope 3 emissions — similar to trends observed across the ICT sector — comprise around 80% of our total emissions. Decarbonising both our direct operations and value chain is therefore integral to our commitment to our net-zero target.

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Operational Decarbonisation

StarHub has taken early steps to decarbonise our operations in support of meeting our 2030 near-term climate targets. In FY2024, our energy and emissions reduction initiatives – ranging from reducing operations complexity to reusing network equipment – were assessed to have generated approximately \$2.42 million in cost savings.

Details of our decarbonisation approach can be found in our [Annual Report 2024, pages 85–87](#)

Value Chain Engagement

StarHub also recognises that achieving a resilient and inclusive climate transition depends on deep and sustained engagements across our entire value chain. Through these engagements, we seek to ensure that our operations are aligned with Singapore Green Plan 2030 and other broader climate and sustainability goals.

Our engagement methods with the various stakeholders can be found in our [Annual Report 2024, pages 75–77](#)

Targets and Performance Tracking

Table 1: StarHub Group Scope 1+2 GHG Emissions

Scope of Emissions	FY2024 (tCO ₂ e)	FY2023 (tCO ₂ e)	FY2022 (tCO ₂ e)	FY2021 (base year) (tCO ₂ e)
Scope 1	1,669	1,962	1,187	1,356
Scope 2 (location-based)	63,440	61,534	67,083	67,148
Scope 2 (market-based)	52,410	52,374	57,851	63,539
Total Scope 1+2 (market-based)	54,079	54,336	59,037	64,895

As disclosed in our 2024 Annual Report, our FY2024 Scope 1 emissions declined by approximately 15% and Scope 2 (location-based) emissions increased by about 3.1%, compared to the previous year. The Scope 1 emissions reduction was primarily due to lower refrigerant top-ups, while Scope 2 emissions increase was driven by higher operational energy consumption from growing business needs, 5G network migration, data centre utilisation, among others. With mitigation actions taken through the purchase of renewable energy certificates, total Scope 1+2 (market-based) emissions decreased by 16.7% relative to FY2021 base year, keeping the Group **on track to meeting our Scope 1+2 (market-based) near-term target of reducing 50% absolute emissions by 2030 from the base year 2021**.

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Looking ahead, we will continue to expand renewable energy sourcing and invest in energy efficiency measures across our operations to further reduce our carbon footprint and strengthen progress toward our longer-term net-zero ambition.

Table 2: StarHub Group Scope 3 GHG Emissions

Scope 3 Categories	FY2024 (tCO ₂ e)	FY2023 (tCO ₂ e)	FY2022 (tCO ₂ e)	FY2021 (base year) (tCO ₂ e)
1: Purchased goods and services	150,705	182,528	158,458	135,736
2: Capital goods	9,774	10,082	7,553	7,882
3: Fuel and energy-related emissions	10,320	10,465	11,446	11,410
4: Upstream transportation & distribution	4,253	3,505	7,076	1,705
5: Waste generated in operations	9	10	14	4
6: Employee business travel	359	473	347	117
7: Employee commute	207	387	462	243
8: Upstream leased assets	3,658	4,919	4,435	5,291
9: Downstream transportation and distribution	Immaterial as emissions are estimated to be about 5-10% of our reported Category 4 (or less than 0.1% of total Scope 3 emissions).			
10: Processing of sold products	Not relevant as StarHub does not sell intermediate products			
11: Use of sold products	54,562	39,836	35,716	35,821
12: End-of-life of sold products	35	36	41	65
13: Downstream leased assets	52,153	39,886	33,727	35,076
14: Franchises	43	84	85	131
15: Investments	6,881	4,991	6,538	7,757
Total Scope 3	292,960	297,204	265,899	241,236

At the time of our 2024 Annual Report publication, data for Categories 1, 2, 4, 11, 12, and 15 of StarHub Group's Scope 3 emissions were unavailable and therefore omitted from disclosure. The data has since been collected and is now included in this Plan.

Scope 3 emissions remain the largest contributor to our total Group-level carbon footprint. At the outset of our corporate-wide GHG emissions accounting, we had embarked on our Scope 3

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emission accounting using spend-based methodology – a top-down approach – to estimate emissions from our material categories. While this approach had helped us identify hotspots, we recognise it lacks granularity and obscures the ability to identify high emissions-impact purchased goods and services, capital goods and products sold, which are the main drivers of emissions within the value chain. We have since adopted a stewardship approach to obtain bottom-up activity-based information of our key suppliers. This stewardship approach has led in a more intentional refinement of dataset collected across our material Scope 3 emission categories.

When measured against our SBTi-approved target boundary¹, our FY2024 in-scope Scope 3 emissions declined by 9.9%² on a comparable basis with respect to the previous year but increased by about 15.6% relative to our base year 2021. This indicates the Group is **not on track to meeting our Scope 3 near-term target of reducing 25% absolute emissions (Categories 1, 2, 3 and 13) by 2030 from the base year**.

Emissions from purchased goods and services (Category 1) continue to account for the majority share despite year-on-year emissions reduction due to greater data availability and accuracy, which had prevented double counting across Scope 1 and 2 and other relevant Scope 3 emission categories. On the other hand, emissions increase from downstream leased assets (Category 13) was primarily driven by greater business activities in our leased data centres.

For the past few years since we set our net-zero targets, we recognise that we have not been on track to meeting our Scope 3 near-term target, despite efforts made to decarbonise in choosing lower-impact product alternatives or improving overall energy efficiency through solution designs. Building on the positive trend of greater data availability and accuracy, as well as improvements in data measurements and emissions accounting methodologies, we are taking steps to enhance our stewardship approach to Scope 3 emissions accounting by progressively shifting from spend-based to activity-based data where appropriate. In parallel, we are also refining our supply chain engagement roadmap to strengthen engagements with key suppliers, support more robust data collection, and drive deeper decarbonisation across our value chain.

Supporting Climate Targets

Beyond our validated science-based emissions reduction targets, StarHub has established additional climate-related goals that support our broader decarbonisation and sustainability ambitions. In FY2024, we **achieved carbon neutrality** for our corporate office and four main retail shops, a milestone we aim to maintain in FY2025 and beyond. Renewable energy use grew to 17.2%, keeping us **on track to reaching our target of 30% renewable energy share by 2030**.

¹ Based on the SBTi-approved target boundary, the collective emissions from purchased goods and services (Category 1), capital goods (Category 2), fuel and energy related-activities not in Scope 1 and 2 (Category 3), and downstream leased assets (Category 13) cover at least two-thirds of total Scope 3 emissions

² StarHub expects improvements in our data quality and would continue to provide such contextual explanation of changes on the emissions as per the GHG Protocol Standards, providing complete and transparent view to our stakeholders on our Scope 3 emissions reduction journey.



We also began collaborating with subsidiaries to collect e-waste recycling data, laying the groundwork to divert 100% of ICT e-waste from Group's operations for recycling by 2030.

StarHub remains committed to our net-zero by 2050 ambition and the transparent disclosure of our Scope 1, 2 and 3 GHG emissions. In light of the challenging economic outlook, we also recognise the feasibility to strengthen our reporting capabilities while balancing with resources limitations, climate readiness and market expectations. As such, we will continually review our net-zero targets to ensure they are both science-based and practical. Moving forward, we will sharpen our climate transition plan so that our climate commitments remain credible, actionable, and aligned with the long-term interests of our stakeholders.

Additional climate-related goals can be found in our [Annual Report 2024, page 79](#)

Review and External Assurance

As with previous years, StarHub engaged KPMG LLP to conduct independent limited assurance of selected ESG metrics disclosed in our SR2024³. In addition to internal review, we view independent assurance as an important supplement to ensuring the accuracy, credibility, and reliability of our key sustainability data. The RSC, under delegated authority from the Board, plays an active role in overseeing this process, including the review of the ESG assurance report and associated disclosures.

Our independent limited assurance report is presented in our [Annual Report 2024, pages 146–149](#)

³ All (100%) of Scope 1, Scope 2 and Scope 3 (Cat 3 and Cat 8 data) has been externally assured at Group level. Scope 3 Cat 5, Cat 6, Cat 7, Cat 13 and Cat 14 data were not fully assured as complete information at StarHub Group level was not available at the time of assurance. We are working towards obtaining external assurance for all data in the future when data measurements and quality improves.