

INFOMINA BERHAD

Registration No. 200701018579 (776590-U)

SUSTAINABILITY POLICY

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Abbreviations

In this manual, the following abbreviations shall have the following meaning unless otherwise stated:

ARMC	Audit & Risk Management Committee		IFRS	International Financial Reporting Standards
BOD	Board of Directors		KPIs	Key Performance Indicators
CEO cum MD	Chief Executive Officer cum Managing Director		MCCG	Malaysian Code on Corporate Governance
ESG	Environmental, Social and Governance		NSRF	National Sustainability Reporting Framework
GHG	Greenhouse Gas		PDPA	Personal Data Protection Act 2010
ISSB	International Sustainability Standards Board		Policy	Sustainability Policy

1.0 Purpose

Infomina Berhad ("Infomina" or the "Company") and its subsidiary companies (collectively, the "Infomina Group" or the "Group") are committed to conducting business responsibly, ethically and sustainably. The Group recognises that long-term business success is closely linked to the effective management of environmental, social and governance ("ESG") matters and the creation of sustainable value for stakeholders.

As a technology-driven organisation, the Group strives to integrate sustainability considerations into its business strategies, operations and decision-making processes through responsible business practices, sound governance, responsible innovation and meaningful contributions to the communities and industries in which it operates.

This Sustainability Policy ("Policy") establishes the Group's commitment, principles and approach to managing material sustainability matters and serves as a framework for embedding sustainability across the organisation.

The Policy also supports the Group's compliance with applicable sustainability-related laws, regulations, listing requirements and reporting frameworks, including:

- Bursa Malaysia ACE Market Listing Requirements;
- National Sustainability Reporting Framework ("NSRF");
- International Financial Reporting Standards ("IFRS") Sustainability Disclosure Standards issued by the International Sustainability Standards Board ("ISSB"), including IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2 *Climate-related Disclosures*; and
- Malaysian Code on Corporate Governance ("MCCG").

2.0 Scope

This Policy applies to all directors, employees and subsidiary companies of the Infomina Group, as well as contractors, suppliers, consultants and business partners acting on behalf of, or providing services to the Group.

For the purposes of this Policy:

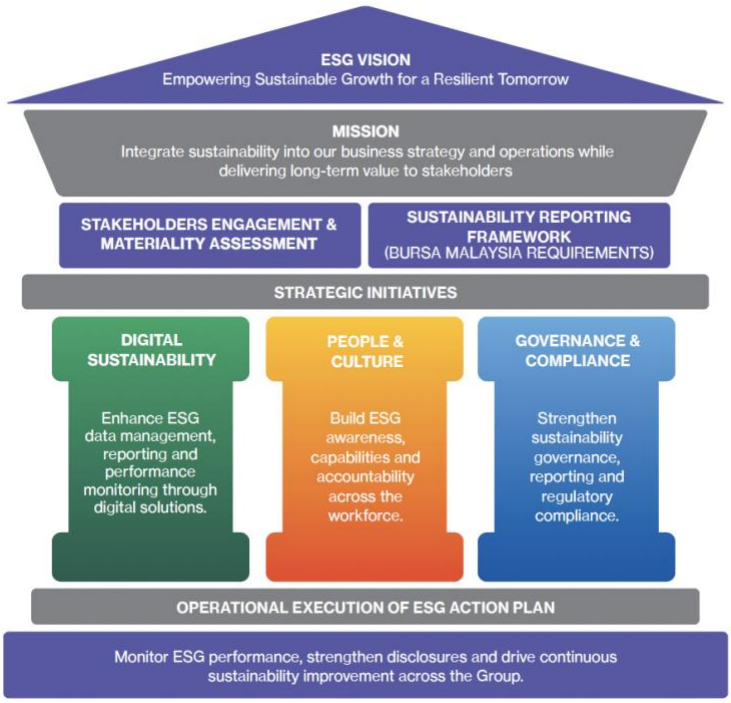
- **ESG** refers to environmental, social and governance matters.
- **Material sustainability matters** refer to the ESG topics identified through the Group's materiality assessment process as having the most significant actual or potential impacts on the Group's business, stakeholders and long-term value creation.

All persons and entities within the scope of this Policy are expected to conduct their activities in a manner that is consistent with the principles and commitments set out herein.

Any terms not specifically defined in this Policy shall have the meanings assigned to them under the Group's Code of Conduct & Ethics, Whistleblowing Policy and Guidelines or other relevant Group policies where applicable.

3.0 Sustainability Framework

The ESG Framework serves as the foundation for embedding sustainability into the Group's strategy, operations and stakeholder engagements. The Framework is guided by the Group's ESG Vision and supported by the mission to integrate sustainability considerations into business strategies and operational practices while creating long-term value for stakeholders.



The ESG Framework is developed based on the Group's material sustainability matters, stakeholder expectations, business priorities and applicable sustainability reporting requirements.

Material sustainability matters are identified and prioritised through a periodic materiality assessment, which considers both the Group's impact on the economy, environment and people, and the significance of ESG issues to the Group's business and financial performance. The materiality assessment is reviewed at least once every two years, or earlier where a material change in the Group's operations or external environment warrants it.

The Framework provides a structured approach to:

- integrate ESG considerations into strategic planning and operational decision-making;
- identify, assess and manage sustainability-related risks and opportunities, including climate-related risks and opportunities;
- establish clear governance responsibilities for sustainability oversight and implementation;
- monitor, measure and evaluate ESG performance against targets and key performance indicators; and
- promote continuous improvement in the Group's sustainability practices and initiatives.

4.0 Sustainability Principle

4.1 Environmental Stewardship

Infomina aims to minimise the environmental impact of its operations and to promote responsible environmental practices.

We are committed to:

- Promoting the efficient use of energy, water and other resources.
- Reducing waste generation and encouraging responsible waste management practices.
- Measuring and reporting our greenhouse gas ("GHG") emissions, at minimum covering Scope 1 (direct) and Scope 2 (energy-related) emissions and extending to material Scope 3 emissions (indirect) as data and methodology mature.
- Supporting initiatives that contribute to the reduction of greenhouse gas emissions.
- Considering environmental impacts in operational and business decisions where practicable.
- Fostering environmental awareness among employees and stakeholders.
- Identifying and managing climate-related risks and opportunities relevant to our business activities, including through integration of climate considerations into the Group's enterprise risk management process, and working towards disclosure of climate-related governance, strategy, risk management, and metrics and targets consistent with the direction of Bursa Malaysia's sustainability reporting requirements.

4.2 Social Responsibility

We recognise that our employees, customers, suppliers and communities are fundamental to our long-term success.

We are committed to:

- Promoting diversity, equity, inclusion and equal opportunity.
- Providing a safe, healthy and respectful working environment, in accordance with the Occupational Safety and Health Act 1994 and other applicable workplace safety laws.
- Investing in employee development, learning and professional growth.
- Upholding human rights and fair labour practices, including respect for the prohibition of forced labour and child labour, consistent with the Employment Act 1955 and applicable international labour standards.
- Engaging responsibly with customers, suppliers, business partners, regulators and local communities.
- Supporting initiatives that contribute to social well-being, education and community development.

4.3 Good Governance and Ethical Conduct

Strong governance forms the foundation of sustainable business performance and stakeholder trust.

We are committed to:

- Complying with all applicable laws, regulations and regulatory requirements.
- Upholding ethical business conduct and maintaining a zero-tolerance approach towards bribery, corruption, fraud and misconduct.
- Maintaining effective risk management and internal control systems.
- Maintaining appropriate policies and procedures relating to anti-bribery and corruption, whistleblowing, conflict of interest and ethical business conduct.
- Promoting transparency, accountability, and integrity in all business dealings, and ensuring our sustainability-related disclosures are accurate, evidence-based and not misleading.
- Supporting a culture of compliance, continuous learning and responsible decision-making.
- Safeguarding stakeholder interests through sound corporate governance practices.

5.0 Sustainability Commitments

5.1 Responsible Technology and Innovation

As a provider of enterprise technology and digital transformation solutions, Infomina recognises its responsibility to deliver technology that supports sustainable and resilient outcomes.

We are committed to:

- Promoting responsible digital transformation and innovation.
- Delivering secure, reliable and resilient technology solutions.
- Encouraging the responsible and ethical use of emerging technologies.
- Integrating sustainability considerations into the design and delivery of services where appropriate.
- Supporting customers in improving operational efficiency, resilience, and long-term sustainability through technology.

5.2 Data Privacy and Cybersecurity

Digital trust is fundamental to our business and stakeholder relationships.

We are committed to:

- Protecting confidential information and information assets entrusted to us.
- Maintaining appropriate cybersecurity measures to safeguard systems and data.

- Complying with the Personal Data Protection Act 2010 and other applicable data protection and privacy requirements.
- Promoting awareness and accountability for information security across the organisation.
- Continuously strengthening cyber resilience in response to evolving threats and risks.

5.3 Responsible Supply Chain Management

We recognise that sustainability extends beyond our direct operations and includes our value chain.

We are committed to:

- Engaging suppliers and business partners that share our commitment to ethical and responsible business practices, including respect for human rights and the prohibition of forced and child labour.
- Promoting responsible procurement practices.
- Encouraging compliance with applicable legal, ethical, labour, environmental and governance standards.
- Assessing and managing material sustainability risks associated with suppliers and third-party relationships where appropriate.

5.4 Targets, Metrics and Performance Monitoring

The Sustainability Steering Committee is responsible for proposing measurable sustainability targets and key performance indicators ("KPIs") aligned to the Group's material sustainability matters, including targets relating to energy and emissions intensity, waste and water management, workplace safety, employee development, and diversity representation, each with a defined baseline year and timeframe.

Targets and KPIs are subject to Board approval and are monitored and reported on in the Group's periodic sustainability disclosures. Where a target cannot yet be quantified, the Group will disclose its intended approach and expected timeline for establishing it.

6.0 Stakeholders Engagement

Infomina recognises the importance of maintaining open, transparent and constructive engagement with its stakeholders.

We engage with employees, customers, investors, regulators, suppliers, business partners and communities to better understand their expectations, identify emerging sustainability issues and inform our sustainability priorities and decision-making processes.

Stakeholder feedback is considered in the review of material sustainability matters and the development of sustainability strategies and initiatives.

STAKEHOLDERS	KEY INTEREST	ENGAGEMENT CHANNELS	FREQUENCY
Customers	▪ Service Quality ▪ Cybersecurity and Data Protection ▪ Innovation and Technology Solutions	▪ Corporate Website ▪ Meetings/Discussions ▪ Seminars/Workshops	▪ On-going ▪ Ad-hoc ▪ Ad-hoc
Employees	▪ Career Development ▪ Remuneration and Benefits ▪ Employee Well-being and Work-Life Balance	▪ Townhall ▪ Performance Appraisal Exercise ▪ Training/Workshops ▪ Meetings/Discussions	▪ Annually ▪ Annually ▪ On-going ▪ On-going
Government/ Regulators	▪ Regulatory Compliance ▪ Corporate Governance ▪ Responsible Business Practices	▪ Corporate Website ▪ Report Submission	▪ On-going ▪ Ad-hoc
Investors/ Shareholders	▪ Financial Performance ▪ Corporate Governance ▪ Sustainable Growth and Long-Term Value Creation	▪ Annual General Meeting ▪ Annual Report ▪ Announcements to Bursa Securities ▪ Analysts Briefings ▪ Press Release ▪ Corporate Website ▪ Social media	▪ Annually ▪ Annually ▪ Ad-hoc ▪ Ad-hoc ▪ On-going ▪ On-going ▪ On-going
Public/Local Communities	▪ Community Contribution and Social Impact ▪ Environmental Responsibility ▪ Ethical Business Conduct	▪ Annual General Meeting ▪ Annual Report ▪ Announcements to Bursa Malaysia ▪ Press Release ▪ Corporate Website ▪ Social Media ▪ Corporate Social Responsibility Events	▪ Annually ▪ Annually ▪ Ad-hoc ▪ Ad-hoc ▪ On-going ▪ On-going ▪ Ad-hoc
Technology Partners/ Suppliers/Vendors	▪ Delivery Capability and Service Excellence ▪ Business Integrity and Ethical Conduct ▪ Long-Term Collaboration and Business Growth	▪ Corporate Website ▪ Meetings/ Discussions ▪ Seminars/ Workshop	▪ On-going ▪ Ad-hoc ▪ Ad-hoc
The Media	▪ Corporate Transparency ▪ Timely and Accurate Information ▪ Corporate Reputation and ESG Initiatives	▪ Press Release ▪ Media Briefings/ Interviews	▪ Ad-hoc ▪ Ad-hoc

7.0 Governance

The Group adopts a governance structure that promotes accountability, oversight and effective implementation of sustainability practices across the organisation.



7.1 Board of Directors

The Board of Directors holds ultimate responsibility for the Group's sustainability agenda and is responsible for:

- Providing oversight of the Group's sustainability strategy, priorities and performance.
- Reviewing material sustainability matters, risks and opportunities.
- Approving material sustainability targets and KPIs.
- Ensuring sustainability considerations are integrated into the Group's long-term business strategy and decision-making processes.

7.2 Audit & Risk Management Committee

The Audit & Risk Management Committee ("ARMC") supports the Board and is responsible for:

- Reviewing sustainability-related risks and opportunities, including climate-related risks, as part of the Group's overall risk management framework.
- Monitoring the effectiveness of sustainability-related risk management and internal control processes.

- Receiving periodic updates from the Sustainability Steering Committee and providing recommendations to the Board on material sustainability matters where appropriate.

7.3 Chief Executive Officer cum Managing Director

The Group Chief Executive Officer cum Managing Director ("CEO cum MD") is responsible for:

- Leading the implementation of the Group's sustainability strategy and commitments.
- Promoting a culture of sustainability across the organisation.
- Ensuring adequate resources and support are provided for sustainability initiatives.

7.4 Sustainability Steering Committee

The Sustainability Steering Committee, comprising representatives from key business functions, reports to the ARMC and is responsible for:

- Coordinating the implementation of sustainability initiatives across the Group.
- Proposing, monitoring and reporting on sustainability targets, objectives and performance indicators.
- Supporting stakeholder engagement and sustainability reporting activities.
- Identifying, assessing, managing and monitoring sustainability-related risks and opportunities relevant to the organisation, including potential impacts on strategy, operations, financial planning, and resilience where applicable.
- Recommending improvements to enhance the Group's sustainability performance.

The Head of Internal Audit may provide independent advice and consultation to the Sustainability Steering Committee on ESG-related matters, where appropriate. Such advisory activities shall not involve management decision-making or operational responsibilities and shall not impair the independence and objectivity of the Internal Audit function.

7.5 Sustainability Working Group

The Sustainability Working Group supports the Sustainability Steering Committee and is responsible for:

- Implementing sustainability initiatives and action plans.
- Monitoring and reporting sustainability-related data and performance metrics.
- Supporting awareness, training, and engagement activities across the Group.
- Escalating material sustainability matters to the Sustainability Steering Committee where necessary.

8.0 Reporting

The Group is committed to transparent, balanced and accurate sustainability disclosures that reflect its material ESG impacts, risks, opportunities and performance, and to ensuring such disclosures are not misleading.

Sustainability reporting shall be aligned with applicable regulatory requirements, including the Bursa Malaysia Ace Market Listing Requirements and Sustainability Reporting Guide, and shall have regard to the direction of the National Sustainability Reporting Framework ("NSRF"), and international frameworks such as the International Sustainability Standards Board ("ISSB"), as these become applicable to the Group.

9.0 Compliance

Any breach of this Policy by an employee will be addressed in accordance with the Group's Code of Conduct & Ethics and may result in disciplinary action. Breach of this Policy by a supplier or business partner may be addressed in accordance with the relevant contractual terms, up to and including termination of the business relationship.

Concerns about suspected non-compliance with this Policy may be raised through the Group's Whistleblowing Policy and Guidelines.

10.0 Continuous Improvement

Infomina is committed to continually enhancing its sustainability practices, governance processes and ESG performance.

Through this commitment, Infomina seeks to strengthen stakeholder trust, create sustainable long-term value and contribute positively to economic, environmental, and social progress.

11.0 Policy Review and Ownership

This Policy is owned by the Sustainability Steering Committee and administered by the CEO cum MD. The Group will review this Policy at least annually and earlier, where warranted by material regulatory changes, business developments or evolving stakeholder expectations, to ensure its continued relevance and effectiveness. Amendments are recommended by the Sustainability Steering Committee and the CEO cum MD, and endorsed by the ARMC, for the Board's approval.

Queries on this Policy may be directed to the Sustainability Steering Committee via email **esg@infomina.co**

12.0 Circulation

This Policy is made available to the public via Infomina's corporate website. Internally, the Policy is circulated to all employees via memo or email, and all employees are deemed to be aware of, have read, and understood its contents.