SUSTAINABILITY POLICY

1. INTRODUCTION

This policy is intended to address MN Holdings Berhad ("the Company")

Sustainability encompasses all aspects of ethical business practices, addressing relevant Environmental, Social and Governance (ESG) issues responsibly and profitably.

The Company recognizes the importance of sustainability and its increasing to the organization and its stakeholders. The Company is committed to understanding and implementing sustainable practices to meet its goals while achieving right balance of the needs of the wider community, the requirements of shareholders and stakeholders as well as economic success.

2. OBJECTIVE

The main objective of the policy is to establish guidelines on Company's sustainability activities and how these activities are to be conducted. The work should contribute to sustainable development and be an integral and natural part of our entire business operation, which is built on participation and engagement.

This policy aims to:

a) Endeavour to integrate the principles of sustainability into the Company's strategies, policies and procedures;
b) Promote sustainable practices;
c) Comply with and exceed, where practicable, all applicable legislation, regulations and codes of practice;
d) Ensure that the Board and senior management are involved in the implementation of this policy and review the sustainability performance, as well as including setting the Company's sustainability strategies, priorities and targets; and
e) Create a culture of sustainability within the Company, and the community, with an emphasis on integrating environmental, social and governance considerations into decision making and the delivery of outcomes.

3. SOCIAL SUSTAINABILITY

The Company endeavors to enriching the infrastructure of sustainable society that promotes wellbeing, by understanding needs of the employees and communities and work to foster healthy and liveable communities.

a) Providing a secure and safe workplace for all employees;
b) Promoting safety and well-being amongst all employees;
c) Upholding fundamental human rights of our employees, those in our value chain, and the communities in which we operate;
d) Strictly oppose child labour and forced labour;
e) Promoting racial harmony and prevent discrimination;
f) Ensuring a diverse workforce and providing equal opportunity;
g) Preventing sexual harassment and other forms of violence;
h) Encouraging employees to further develop their professional and personal skills;
i) Supporting and encourage community development;
j) Actively encourage our people to get involved in the charity work;
k) Upkeeping healthy public perception and positive experience of the Company;

l) Responding in a professional and timely manner to public enquiries;
m) Ensuring responsible and ethical sourcing and marketing;

4. ENVIRONMENTAL SUSTAINABILITY

The Company persists in operating in an eco-friendly manner with the aim to consume material responsibly, minimise environmental footprint and preserve liveable environment condition.

a) Complying with environmental regulatory and legal requirements;
b) Mitigating and minimising the impact of climate change;
c) Minimising greenhouse footprint throughout the Company's operations, and logistics.
d) Minimising the level of pollutants from daily business operations;
e) Pursue and encourage the use of renewable resources;
f) Reducing consumption of non-renewable, non-recyclable materials;
g) Reducing waste in our operations and responsibly handling the waste that we produce.

5. GOVERNANCE SUSTAINABILITY

The Company strives to strengthening trustworthiness of stakeholders as well as structuring an avenue for continuous operations and developments by permeating good governance practice throughout of our operations.

a) Ensuring governance sustainability forms an integral part of the Strategic Planning;
b) Embedding sustainability through regular updates of strategies, policies, procedures and provide relevant training;
c) Continuously improve and establish appropriate governance structures and processes;
d) Assessing the impacts and outcomes of sustainability;
e) Strategizing for long term human capital and financial resources; and
f) Complying with applicable regulations and legal requirements.

6. REPORTING AND DISCLOSURES

The Company will set short and long-term targets for sustainability efforts. The targets must be measured by metrics for measurement, tracking and reporting. The Company will integrate the metrics into the Company's performance management as part of the sustainability strategy.

The Board should ensure that the Company's sustainability strategies, priorities and targets as well as performance against the said targets are communicated to its internal and external stakeholders.

7. PERIODIC REVIEW

This policy shall be reviewed periodically or as and when necessary by the Board.

END.

MN HOLDINGS BERHAD
Registration No. 202001038774 (1395095-M)
(Incorporated in Malaysia)

ESG Master Governance and Data Control Manual

For ESG Data Performance Monitoring, Review, Approval and Sustainability Statement Disclosure

1. Document Control

Document / Control Area	Description	Version	Purpose
Master Document	ESG Master Governance and Data Control Manual	v1.0	Defines ESG oversight, data ownership, metric code evidence filing, monitoring, review, approval and disclosure controls.
ESG Data Master Tracker	Working Excel tracker / subsidiary data-entry register	v1.0	Monitors activity-data inputs by subsidiary, metric code and reporting period before review and approval.
Reference Standards and Guides Register	Standards register embedded in this master file	v1.0	Identifies applicable Bursa, NSRF, IFRS S1 and IFRS S2 references used for disclosure alignment.

2. Purpose

- Formalise ESG governance roles and responsibilities across the Group and subsidiaries.
- Oversee ESG data performance monitoring, validation and approval before Sustainability Statement disclosure.
- Embed ESG oversight into the Risk Management Committee (RMC) and Board reporting process.
- Support ongoing IFRS S1 and IFRS S2 materiality assessment and stakeholder engagement activities in 2026.
- Provide a clear basis for document retention, audit trail, metric-code evidence filing and management review.

3. Scope

- Applies to ESG data collection, validation, consolidation, review, approval and disclosure processes for the Group.
- Covers Environmental, Social and Governance data, including energy consumption, GHG activity data, diversity and inclusion, health and safety, training, regulatory compliance and ESG risk monitoring.
- Applies to all reporting entities and subsidiaries included in the Group Sustainability Statement boundary, including MNHB Group, MNUE, MNOG, MNS, MNPT, MNSSB and other entities as applicable.
- Controls activity-data inputs only prior to application of GHG emission factors; emission factors and GHG calculations are controlled by the appointed third-party.

4. Key Control Principles for ESG Master Data

Control Principle	Requirement
Activity-data monitoring only	The ESG Data Master Tracker monitors activity-data inputs only, before emission factors are applied.
Third-party GHG control	GHG emission factors, conversion factors and GHG calculation methodology shall be controlled by the appointed third-party.
No emission factor storage	Emission factors shall not be maintained in the ESG Data Master Tracker workbook.
UOM consistency	The Sustainability Manager shall monitor completeness, monitoring UOM consistency, supporting evidence, third-party output references and approval status.

Control Principle	Requirement
Metric-code filing	Each source document shall be filed using the relevant metric code as the document reference code and folder name for audit trail purposes.
Disclosure approval	Only reviewed and approved ESG data packs shall be used for Sustainability Statement disclosure.

5. Reference Standards and Guides Register

Reference Code	Standard / Guide	Version / Effective Date	Application in MN Holdings ESG Governance
REF-BURSA-SRG-001	Bursa Malaysia Sustainability Reporting Guide and Toolkits	3rd Edition / 2022; latest Bursa Sustainability Reporting Guide stated on Bursa Assist and MyBURSA	Used as Bursa guidance for Sustainability Statement disclosure, sustainability governance, materiality assessment, stakeholder engagement, management approach and quality of disclosure.
REF-NSRF-001	National Sustainability Reporting Framework (NSRF)	Launched 24 September 2024; phased and developmental implementation approach	Used as Malaysia reference framework for adoption of ISSB Standards as baseline, including climate-first approach, transition reliefs and assurance readiness.
REF-IFRS-S1-001	IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information	Issued 26 June 2023; effective for annual reporting periods beginning on or after 1 January 2024	Used to guide governance, strategy, risk management, metrics and targets, and materiality assessment for sustainability-related risks and opportunities.
REF-IFRS-S2-001	IFRS S2 Climate-related Disclosures	Issued 26 June 2023; effective for annual reporting periods beginning on or after 1 January 2024	Used to guide climate-related disclosure readiness, including activity-data monitoring for GHG emissions, energy and climate-related metrics. Emission factors and calculation methodology remain controlled by the appointed third-party.

6. ESG Governance Structure

Governance Level	Oversight Role	Key Responsibilities
Board of Directors	Ultimate oversight and approval	Approve Sustainability Statement and key ESG disclosures; approve or note material ESG matters and strategic ESG direction; ensure sustainability-related risks and opportunities are considered in governance oversight.
Risk Management Committee (RMC)	Board committee oversight	Review ESG risks, ESG performance, material sustainability matters and disclosure readiness; monitor action plans from ESG audit observations; challenge significant data variances and unresolved ESG matters; recommend Sustainability Statement matters to the Board.
Management	Management-level accountability	Oversee implementation of ESG framework, policies, KPIs and targets; review consolidated ESG data packs before RMC tabling; approve corrective actions and assign accountability; ensure subsidiaries submit complete and timely ESG information.
Sustainability Manager	Coordination and consolidation	Maintain ESG Data Master Tracker and data dictionary; coordinate data collection, validation workflow and evidence tracking; consolidate ESG performance and

Governance Level	Oversight Role	Key Responsibilities
		prepare RMC / Board reporting pack; coordinate materiality assessment and stakeholder engagement activities.
Subsidiary Data Owners	Data preparation and first-level accountability	Collect and submit activity data using approved templates; maintain source documents; explain variances and data gaps; confirm accuracy and completeness of submitted information.
Reviewer / Finance / Internal Control Function	Independent review support	Review completeness, reasonableness, monitoring UOM consistency and supporting evidence; identify control gaps, late submissions or unsupported data; maintain review sign-off records.
Third-party	GHG methodology and output control	Control GHG emission factors, conversion factors and emissions calculation methodology; generate emissions output reports based on approved activity data inputs submitted by the Sustainability Manager.

7. End-to-End ESG Data Workflow Diagram

Process Flow			
Data Identification -> Template Distribution -> Data Collection -> Evidence Filing -> Data Pack Submission v1.0 -> Review and Validation -> Third-party GHG Calculation -> Group Consolidation -> Management / RMC / Board Approval -> Sustainability Statement Disclosure -> Archive			
Step	**Status / Stage**	**Action**	**Output / Evidence**
1	Data identification	Sustainability Manager confirms applicable metrics and metric codes for each subsidiary.	Metric Code Register
2	Template distribution	Sustainability Manager issues subsidiary tracker tabs and metricF-code folders to Data Owners.	Distribution log / tracker issued
3	Data collection	Subsidiary Data Owners collect activity-data inputs using approved monitoring UOMs.	Completed data row and source evidence
4	Evidence filing	Data Owners file supporting documents by year, period, subsidiary and metric code.	Metric-code folders and document references
5	Data pack submission	Preparer / Data Owner submits Data Pack v1.0 to reviewer. Dates and statuses change each cycle; version remains v1.0 unless template, methodology or control structure changes.	Submitted data pack
6	Review and validation	Reviewer / Sustainability Manager checks completeness, UOM consistency, supporting documents and variance explanations.	Validation checklist / review notes
7	Third-party GHG calculation	For GHG metrics, Sustainability Manager uploads approved activity data to third-party solution. Emission factors are controlled outside the tracker.	Third-party output report reference
8	Group consolidation	Sustainability Manager consolidates subsidiary data and monitors ESG performance.	Group consolidation summary
9	Management / RMC / Board approval	Management, RMC and/or Board review ESG performance, material matters, risks and disclosure readiness.	Review pack, minutes and approval status
10	SS disclosure and archive	Approved data is used for Sustainability Statement disclosure and retained for future audit.	Final disclosure pack and archive
11	Reference standard check	Sustainability Manager confirms the data pack and disclosure draft are aligned with Bursa SRG, NSRF, IFRS S1 and IFRS S2.	Reference standards checklist and approval evidence

8. Responsibility Matrix for ESG Data Performance Monitoring

Activity / Control Point	Board	RMC	Mgmt	ESG Team	Data Owners	Reviewer / Finance	Third-party GHG Solution
Approve Sustainability Framework and ESG governance approach	A	R/C	R	C	I	C	I
Set ESG KPIs, targets and monitoring approach	A	R/C	R	C	C	C	I
Maintain ESG Data Governance SOP and data dictionary	I	C	A	R	C	C	I
Confirm metric codes and folder structure	I	I	C	A/R	R	C	I
Collect activity data inputs and evidence	I	I	I	C	A/R	C	I
Validate data completeness and UOM alignment	I	I	C	C	R	A/R	I
Control GHG factors and calculate emissions output	I	I	I	C	I	C	A/R
Reconcile third-party GHG output to approved activity data	I	I	C	A/R	C	R	C
Review ESG performance and exceptions	I	A/R	R	C	C	C	I
Review Sustainability Statement disclosure pack	A	R/C	R	C	C	C	I
Approve ESG data for Sustainability Statement disclosure	A	R	R/C	C	I	C	I
Track corrective actions from ESG audit observations	I	A/R	R	R	C	C	I
Conduct IFRS S1/S2 materiality assessment and stakeholder engagement	A	R/C	R	A/R	C	C	I

Legend: A = Accountable, R = Responsible, C = Consulted, I = Informed

9. DEFRA UK-Aligned Monitoring UOM for Activity-Data Inputs

Important Control Note			
The following units are monitoring inputs only. Emission factors are not maintained in the ESG Data Master Tracker and shall be controlled by the appointed third-party.			
Input Category	**Metric Code**	**Monitoring UOM**	**Source Evidence**
Purchased electricity	ENV-ENE-001	kWh	Electricity bills / TNB statements
Petrol / gasoline	ENV-GHG-001	litres	Petrol card statements / fuel receipts
Diesel	ENV-GHG-002	litres	Diesel receipts / equipment fuel log
Natural gas	ENV-GHG-003	kWh or m3	Gas invoices / meter records

Important Control Note			
Refrigerant	ENV-GHG-004	kg	Service reports with gas type and kg topped up
Business travel - car	ENV-GHG-005	km	Mileage claims / trip logs
Air travel	ENV-GHG-006	passenger-km or trip details	Itinerary / travel agency report
Rail / bus / taxi	ENV-GHG-007	km or passenger-km	Receipts / claims / travel reports
Hotel stays	ENV-GHG-008	room-night	Hotel invoices / travel reports
Water supplied / wastewater	ENV-WAT-001 / ENV-WAT-002	m3	Water bills / wastewater bills
Waste generated	ENV-WST-001	tonnes	Waste contractor reports / consignment notes
Freight	ENV-FRT-001	tonne-km	Logistics reports / delivery orders
Purchased materials	ENV-MAT-001	kg or tonnes	Purchase records / supplier invoices

10. Metric Code and Document Filing Convention

Item	Naming Rule / Example	Purpose
Folder structure	FY2026/{Reporting Period}/{Subsidiary}/{Metric Code}/	Standard folder hierarchy for each company and ESG metric.
Source document	{MetricCode}_{Subsidiary}_{FY}_{Period}_{Source Type}_{Sequence}.pdf	Unique evidence reference for bills, receipts, claims, reports and schedules.
Example - electricity bill	ENV-ENE-001_MNUE_FY2026_Q1_ELEC_001.pdf	Evidence for purchased electricity activity data.
Example - staff mileage claim	ENV-GHG-005_MNUE_FY2026_Q1_MILEAGE_001.pdf	Evidence for business travel / staff mileage activity data.
Example - third-party GHG output	ENV-GHG-001_MNUE_FY2026_Q1_3PGHG_OUTPUT_001.pdf	Third-party GHG solution output. No emission factor is stored in the tracker.
Review evidence	{MetricCode}_{Subsidiary}_{FY}_{Period}_REVIEW_{Sequence}.pdf	Reviewer checklist, management approval or follow-up evidence.

11. IFRS S1 and IFRS S2 Materiality Assessment and Stakeholder Engagement - 2026

- The IFRS S1 and IFRS S2 materiality assessment and stakeholder engagement exercise is ongoing in 2026 and shall be documented as part of the Sustainability Statement audit trail.
- Define scope, reporting boundary, subsidiaries and stakeholder groups to be covered.
- Identify sustainability-related risks and opportunities, including climate-related risks and opportunities.
- Engage relevant stakeholders such as Board/RMC, Management, employees, regulators, investors, customers, suppliers, contractors, communities and other relevant parties.
- Evaluate significance of identified ESG matters based on stakeholder input, business impact, risk exposure, regulatory expectations and disclosure relevance.
- Prioritise material sustainability matters and validate results with Management, RMC and Board as applicable.
- Translate material matters into ESG KPIs, targets, action plans, data owners and disclosure requirements.

- Retain evidence of engagement approach, questionnaires, interview notes, attendance records, analysis results, materiality matrix and approvals.

11.1 Frequency of Assessment

- For FY2026, the materiality assessment and stakeholder engagement are being conducted on an ongoing basis.
- The frequency of the full materiality assessment shall be determined by Management, RMC and/or Board as needed, based on business changes, regulatory developments, stakeholder expectations, climate-related risks, major projects, acquisitions, incidents or significant changes in ESG performance.
- As a control baseline, Management should perform an annual review of existing material matters before each Sustainability Statement disclosure cycle to confirm whether a refresh or full reassessment is required.
- A full reassessment may be conducted every two to three years where there are no significant trigger events, or earlier when required by Management, RMC, Board or regulatory expectations.
- Stakeholder engagement may be conducted annually or on a targeted/as-needed basis depending on the topic, stakeholder group and material changes identified during the reporting cycle.

12. Proposed ESG Clauses for RMC Terms of Reference

TOR Area	Point-form Clause / Requirement
ESG oversight scope	- Review material sustainability-related risks and opportunities. - Monitor ESG performance, ESG KPIs and data quality. - Review adequacy of sustainability disclosures and supporting evidence.
Standing agenda item	- Include ESG performance, materiality, stakeholder engagement, GHG emissions and disclosure readiness as standing or periodic agenda items. - Document action items and follow-up status.
Reporting to Board	- Escalate significant ESG risks, unresolved data issues and disclosure matters to the Board. - Recommend Sustainability Statement matters for Board approval.
Data governance	- Review whether ESG data owners, templates, calculation methodologies and validation controls are operating effectively. - Monitor corrective actions from audit observations.

13. Master Documents and Records to Maintain

Master Document	Documents / Evidence to Retain and Disclose Where Applicable
Sustainability Framework	- ESG pillars, scope and boundaries - Material sustainability matters - Approach to identify, assess, manage and disclose ESG matters
ESG Data Governance SOP	- Data collection workflow - Submission timeline - Validation and escalation process - Evidence retention requirements
ESG Data Master Tracker	- Subsidiary-level ESG data - Group consolidation - Validation and approval status - Evidence references
ESG Governance Structure and Responsibility Matrix	- Governance structure - RACI matrix - Data ownership - Review and approval responsibilities
Third-party GHG Output File	- Approved activity data submitted to third-party GHG solution - Third-party emissions output report - Reconciliation of output to approved activity-data inputs - No emission factors maintained in the tracker

Master Document	Documents / Evidence to Retain and Disclose Where Applicable
Materiality Assessment and Stakeholder Engagement File	- Methodology - Stakeholder list - Engagement records - Materiality matrix - Validation and approval evidence
RMC / Board ESG Reporting Pack	- ESG dashboard - Data validation summary - Risk register updates - Action tracker - Minutes and approvals
Diversity & Inclusion and Energy Management Records	- D&I objectives, KPIs and workforce data - Energy Saving Plan and consumption tracker - Target monitoring and initiatives

14. Disclosure Alignment Checklist

Area	Reference	Minimum Evidence / Control	Owner
Sustainability governance and oversight	Bursa SR Guide, NSRF, IFRS S1	RMC / Board ESG agenda, minutes, ESG reporting pack and action tracker	Company Secretary / Sustainability Manager
Materiality assessment and stakeholder engagement	Bursa Toolkits, NSRF, IFRS S1	Materiality methodology, stakeholder engagement records, prioritisation results and Management/RMC validation	Sustainability Manager
Climate-related metrics and GHG activity data	NSRF, IFRS S2	Activity data tracker, UOM validation, source evidence and third-party GHG output reports	Sustainability Manager / Third-party GHG Solution
Sustainability Statement disclosure readiness	Bursa SR Guide, NSRF, IFRS S1 and IFRS S2	Approved data pack, disclosure alignment review, RMC/Board approval evidence and final archive	Management / RMC / Board

15. Document Revision

This document is approved and authorised by the Board. This Policy is issued and controlled by the RMC.

END.