

Reference & Guidelines

SUSTAINABILITY AND RESPONSIBLE BUSINESS PRINCIPLES

1.0 Introduction

- 1.1 Lagenda Properties Berhad and its subsidiaries (“Lagenda” or “the Group”) recognise that the economic, environmental, social and governance impacts associated with our activities extend beyond our direct operations and across our properties, townships, projects, supply chain and wider business relationships. Guided by the four pillars of our Sustainability Framework—Economic Advancement, Ethical Governance, Environmental Stewardship and Social Accountability—we are committed to conducting our business responsibly and working collaboratively with our stakeholders to promote ethical, inclusive and sustainable practices.
- 1.2 This Sustainability and Responsible Business Reference & Guideline (“Reference & Guideline”) does not introduce a new sustainability framework. It consolidates and clarifies the Group’s existing sustainability principles, policies, practices and disclosures, including their application to relevant external stakeholders, into a single public guideline. It should be read together with the relevant Group policies, Annual Report and other public disclosures and does not replace, amend or create additional contractual obligations.

2.0 Scope and Alignment

- 2.1 This document covers the Group’s activities, interactions and business relationships with employees, workers, customers, residents, occupants and tenants of properties owned or managed by the Group, suppliers, contractors, subcontractors, consultants, service providers, government and local authorities, local communities, resident associations, non-governmental organisations and other relevant stakeholders.
- 2.2 External stakeholders are expected to comply with all applicable laws, regulations and contractual requirements. Where relevant to their activities and relationship with the Group, they are also expected to align with the principles and requirements established under the following Group policies:
- Environmental Policy;
 - Climate Change Policy;
 - Biodiversity Policy;
 - Human Rights Policy;
 - Occupational Safety and Health Policy;
 - Anti-Bribery and Anti-Corruption Policy and Guidelines;
 - Whistleblowing Policy and Guidelines;
 - Code of Conduct and Business Ethics;
 - Employment Policy;
 - Quality Policy; and
 - other applicable Group policies, procedures and standards.

2.3 The Group's policies and related disclosures are available through the sustainability and corporate governance sections of Lagenda's corporate website.

2.4 Lagenda manages and monitors relevant sustainability performance through established governance and management processes, supported by appropriate performance data, stakeholder feedback and operational information. Progress and performance are reported in the Group's Annual Report and other public disclosures.

3.0 Economic Advancement

3.1 Lagenda is committed to sustainable economic value creation through the delivery of affordable housing, the development of integrated and liveable townships, responsible landbank management, supply-chain resilience and practical innovation.

3.2 Our approach includes:

- **Affordable housing and economic value:** Supporting access to affordable housing and homeownership by delivering practical, accessible and quality homes for lower- and middle-income households. Through integrated township development, the Group seeks to support local economic participation, household stability and long-term community wellbeing.
- **Quality and customer responsibility:** Delivering quality-to-value outcomes and improving customer experience through quality-management processes, customer feedback, post-handover support and structured defect-resolution mechanisms, guided by the Group's Quality Policy.
- **Responsible supply chain and local procurement:** Supporting local economic participation through responsible procurement and, where practicable, engagement with local suppliers, contractors and service providers. Relevant partners are expected to align with the Group's safety, ethical, environmental and social expectations and may be subject to appropriate screening, evaluation and performance engagement.
- **Responsible landbank and site development:** Conducting pre-screening and risk assessments for all proposed property developments throughout the site-selection, planning, design and development stages. The assessment considers accessibility, existing and planned public transport connectivity, local facilities and amenities, infrastructure plans, zoning requirements, environmental and social considerations, biodiversity, flood risk, local housing demand and development feasibility.
- **Urban regeneration/ redevelopment/ enhancement:** Applying a process for proposed urban regeneration or redevelopment projects that includes preliminary site screening and risk assessment, consideration of existing land use, infrastructure and community needs, engagement with relevant authorities and affected

stakeholders, integration of appropriate mitigation measures into project planning, and monitoring of relevant impacts and stakeholder feedback.

- **Connectivity and community infrastructure:** Considering access to existing and planned public transport across all proposed property developments during site selection, planning, design and development. Assessments also consider roads, pedestrian linkages, essential services, employment areas, commercial centres, community facilities and recreational spaces. Where connectivity gaps are identified, the Group considers feasible improvements and engagement with relevant authorities, taking into account local conditions, available infrastructure and regulatory requirements.
- **Innovation and operational efficiency:** Encouraging standardisation, efficient construction methods, digital solutions and other practical innovations that improve productivity, cost efficiency, resource use and customer experience throughout the property development lifecycle.

4.0 Ethical Governance

4.1 Lagenda seeks to maintain accountability, integrity and transparency across its operations and business relationships. Guided by the Group's Code of Conduct and Business Ethics, Anti-Bribery and Anti-Corruption Policy and Guidelines, Whistleblowing Policy and Guidelines, Human Rights Policy and other applicable requirements, the Group seeks to embed ethical conduct, regulatory compliance, risk management and data protection into its decision-making and business processes.

4.2 Our approach includes:

- **Legal and ethical conduct:** Complying with applicable laws, regulations and contractual obligations and expecting relevant stakeholders to conduct business ethically, responsibly and in alignment with the Group's applicable requirements.
- **Anti-bribery and anti-corruption:** Maintaining zero tolerance for bribery, corruption, fraud, facilitation payments, improper gifts, conflicts of interest, insider trading and other unethical conduct. Lagenda does not make contributions to political parties or politically affiliated entities.
- **Risk management:** Identifying, assessing, managing and monitoring material strategic, financial, operational, regulatory, environmental, social, climate-related, bribery and corruption risks through the Group's established risk management and internal control processes. Material matters will be escalated through the appropriate governance and management channels.
- **Data privacy and security:** Protecting personal, confidential and commercially sensitive information in accordance with applicable data-protection requirements, including the Personal Data Protection Act 2010. The Group seeks to maintain

appropriate access controls, cybersecurity safeguards and information-management practices to prevent unauthorised access, use, loss or disclosure.

- **Transparent reporting:** Maintaining appropriate and accurate business records and supporting transparent, reliable and timely reporting of material business and sustainability information.
- **Reporting and protection from retaliation:** Providing channels for employees, contractors, suppliers, business partners, external stakeholders and members of the public to report suspected misconduct, fraud, corruption, policy breaches or other concerns. Reports are handled confidentially, with anonymous reporting and protection from retaliation provided in accordance with the Group's Whistleblowing Policy and Guidelines and applicable requirements.
- **Investigation and corrective action:** Reviewing reported concerns, investigating potential breaches and taking appropriate corrective, disciplinary or remedial action where non-compliance is identified.
- **Monitoring and continuous improvement:** Periodically reviewing compliance with the Group's Code of Conduct and Ethics and other applicable requirements, identifying instances of non-compliance and strengthening relevant controls, awareness and due-diligence processes where necessary.

5.0 Environmental Stewardship

5.1 Lagenda seeks to prevent and reduce adverse environmental impacts associated with its operations, properties, projects and business relationships. Guided by the Group's Environmental Policy, Climate Change Policy, Biodiversity Policy and other applicable principles, our approach covers energy, emissions, climate resilience, pollution, waste, resource efficiency, water stewardship and biodiversity.

5.2 Our approach includes:

- **Energy, emissions and climate resilience:** Improving energy efficiency, promoting responsible energy consumption, reducing greenhouse gas emissions, increasing the use of renewable energy where practicable and strengthening resilience to climate-related risks.
- **Pollution and waste management:** Preventing pollution, including improper discharge, contamination, dust and noise, while reducing waste through refuse, reduction, reuse, recycling, recovery and repurposing practices.
- **Resource efficiency:** Promoting the efficient use of water, building materials, equipment and facilities and encouraging operational and construction practices that reduce unnecessary resource consumption.

- **Hazardous substances:** Managing hazardous substances and scheduled waste responsibly and in accordance with applicable legal, environmental and safety requirements.
- **Water stewardship:** Monitoring water consumption, promoting water conservation and efficiency, and supporting rainwater harvesting, water reuse and other responsible water-management measures where practicable. The Group seeks to identify water-related risks using relevant location-specific information. Where operations or developments are identified as being located in water-stressed areas, Lagenda will engage relevant authorities or water operators, local communities and other affected stakeholders on material water-related risks, with appropriate actions and follow-up informed by local conditions.
- **Biodiversity management:** Assessing biodiversity risks across all proposed and existing developments and properties and integrating relevant considerations into site selection, planning, design, development and property management. Where material biodiversity risks are identified, Lagenda may establish and periodically review or audit site-specific management measures or Biodiversity Action Plans.
- **Environmental compliance:** Complying with applicable environmental laws, approvals, licences, permits and standards and addressing identified environmental incidents or non-compliance through appropriate corrective measures.
- **Responsible Property Portfolio Management:** Identifying and managing environmental impacts arising from the operation and use of properties owned or managed by the Group, including impacts associated with tenant activities. Relevant matters include energy use, water consumption, waste management, pollution prevention, biodiversity and climate-related impacts. The Group communicates applicable expectations to tenants, residents, occupants, contractors and service providers through written communications, awareness initiatives, meetings and feedback channels, and follows up on material concerns within its management responsibilities.

6.0 Social Accountability

6.1 Lagenda acknowledges its responsibility to respect human rights, uphold fair labour practices, maintain safe, healthy and inclusive workplaces, and contribute positively to the communities in which we operate. Guided by the Group's Human Rights Policy, Employment Policy, Occupational Safety and Health Policy, Quality Policy and other applicable Group policies, our approach is also informed by internationally recognised principles, including the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, the United Nations Convention on the Rights of the Child and the Children's Rights and Business Principles and other principles set out in Annual Report and other public disclosures.

6.2 Our approach includes:

- **Human rights and fair labour practices:** Prohibiting child labour, forced labour, human trafficking and modern slavery; respecting freedom of association and collective bargaining; supporting fair wages or minimum living wages, addressing excessive working hours including equal pay for equal work and voluntary employment; and preventing discrimination, bullying, harassment, intimidation, abuse and retaliation.
- **Diversity, equality and inclusion:** Promoting equal opportunity, merit-based employment, equal pay for work of equal value and an inclusive environment that respects the rights and dignity of all individuals.
- **Occupational safety and health:** Providing safe and healthy working conditions through appropriate risk assessments, training, supervision, protective equipment, emergency preparedness, incident management and worker consultation.
- **Children's rights and development:** Respecting children's rights beyond the prevention of child labour, including their safety, wellbeing, education and protection from harm, while supporting children and young people through education, literacy, school-support, family-assistance and youth-development initiatives.
- **Community contribution and employee volunteering:** Supporting community wellbeing through affordable housing, community programmes, partnerships and Group-coordinated employee volunteering, including through the Employee Engagement Committee ("EEC"), aligned with identified organisational and community needs.
- **Employee and worker engagement:** Engaging employees, workers and their representatives on relevant workplace and social matters through appropriate consultations, briefings, surveys, feedback channels and grievance mechanisms.
- **Broader stakeholder engagement:** Committing to engage tenants of properties owned or managed by the Group, residents, resident associations and local communities on relevant social issues, including health and safety, accessibility, human rights, wellbeing and community needs. Engagement takes place through appropriate consultations, surveys, briefings, feedback and grievance channels, and community programmes, with material concerns referred to responsible teams for follow-up.
- **Inclusive and connected developments:** Across all proposed developments, Lagenda considers community needs, accessibility, existing and planned public transport connectivity, pedestrian linkages, essential services, community facilities, supporting infrastructure and access for persons with disabilities throughout the planning, design and development stages.

7.0 Implementation and Continuous Improvement

- 7.1 Relevant Group functions will communicate applicable principles and expectations under this Reference & Guidelines through appropriate channels, including onboarding, tenant briefings, awareness programmes, meetings, community consultation and written communications. Lagenda seeks to work collaboratively with its stakeholders to strengthen awareness, improve performance and support continuous improvement.
- 7.2 Implementation will consider the nature of the relationship, the Group's responsibilities and the significance of identified risks and impacts. Relevant teams will review material stakeholder feedback, retain appropriate records and coordinate follow-up or corrective action through established management processes.
- 7.3 Lagenda seeks to work collaboratively with stakeholders to strengthen awareness, improve performance and support continuous improvement. Relevant progress and outcomes will be monitored through the Group's existing sustainability governance and reporting arrangements.
- 7.4 This Reference & Guidelines complements the Group's existing policies, procedures and standards. Lagenda will periodically review it to reflect relevant changes in regulatory requirements, stakeholder expectations, material sustainability matters and the Group's business priorities.