

# Illustrative Sustainability Report

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# Bursa Malaysia Preamble

## 1. Purpose

This Illustrative Sustainability Report ("ISR") is designed to provide a visual conceptualisation of the enhanced sustainability-related disclosure requirements and complements the enhanced Sustainability Reporting Guide (3rd Edition) and related Sustainability Toolkits as an additional form of guidance for listed issuers. Throughout the ISR, references are also made to the various recommendations and/or requirements of other widely accepted international sustainability reporting frameworks.

## 2. Users of this ISR

This ISR is intended for all listed issuers on Bursa Malaysia's Main and ACE Markets. Listed issuers are strongly encouraged to refer to this ISR in the course of preparing their respective Sustainability Statements.

**The ISR has been developed in recognition of the fact that listed issuers may be at different stages of their sustainability journey, making it applicable to various levels of understanding and sophistication in sustainability disclosures and practices. It serves as an illustrative example of how a hypothetical listed issuer addresses sustainability-related disclosure requirements under Bursa Malaysia's Listing Requirements. However, the contents of the ISR shall not be construed as authoritative guidance for:**

- (i) complying with Bursa Malaysia's Listing Requirements pertaining to sustainability;**
- (ii) meeting the requirements of all cross-referenced international reporting standards/ frameworks, or**
- (iii) recommended best practices.**

**Each listed issuer should adopt sustainability practices and disclosures tailored to its distinctive operating context (i.e., resources, experience, expertise and understanding).**

In addition to reporting against Bursa Malaysia's Sustainability Reporting Framework and the Recommendations of the Task Force on Climate-related Financial Disclosures ("TCFD"), listed issuers are further encouraged to report in alignment with or, with adherence to, international sustainability reporting frameworks or guidelines such as the Global Reporting Initiative ("GRI") Standards, the Sustainability Accounting Standards Board ("SASB") Standards, the International Sustainability Standards Board ("ISSB") Standards and the FTSE Russell FTSE4Good Criteria.

Other authoritative sources of reference not covered in this ISR include, but not limited to, any standards issued by the European Union's European Financial Reporting Advisory Group ("EFRAG") and the Recommendations of the Taskforce on Nature-related Financial Disclosures ("TNFD").

For further support in embedding sustainability in listed issuers, Bursa Malaysia also offers various resources including (but not limited to):

- a) Bursa Malaysia's Sustainability Reporting Guide 3rd Edition ("Guide");
- b) Bursa Malaysia's Sustainability Toolkits ("Toolkits");
- c) additional guidance documents (e.g., PLC Transformation Programme Guidebook 2); and
- d) best practice approaches, case studies, example disclosures and matrices, accessible via Bursa Sustain; an online one-stop knowledge portal to promote and support development in the areas of corporate governance, sustainability and responsible investment for listed issuers, investors and other stakeholders.

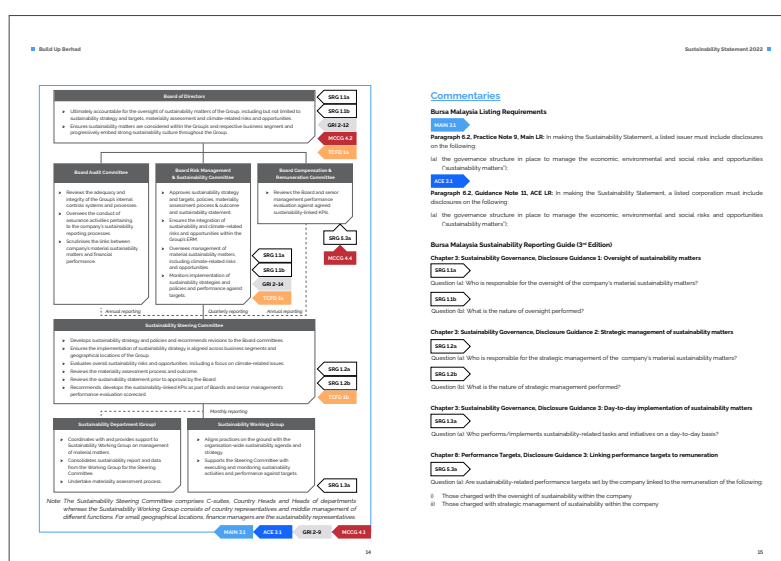
This ISR specifically focuses on guiding listed issuers with their sustainability reporting and disclosures. Any relevant content, supplemental sources of information and examples are to be read as non-exhaustive. In addition, please note the following:

1. The names of people, companies and locations used in this ISR are purely fictional.
2. The definition as well as coverage of each material matter is for illustration purposes only and each listed issuer is expected to develop their own.

## A Quick Tour of the ISR

The contents of the ISR should be read in the same manner as typical reports, alongside the Commentaries.

The Commentaries act as a guide to the given narrative, intended to highlight how the disclosures are addressing the various recommendations and/or requirements of specific frameworks. These have been appropriately labelled for ease of reading.



## DISCLAIMER:

This Illustrative Sustainability Report ("ISR") is issued by Bursa Malaysia Securities Berhad to, among others, assist listed issuers in preparing the Sustainability Statement as required under the Listing Requirements of Bursa Malaysia Securities Berhad [paragraph 9.45(2) and paragraph (29), Part A of Appendix 9C of the Main Market Listing Requirements (supplemented by Practice Note 9) and paragraph (30) of Appendix 9C of the ACE Market Listing Requirements (supplemented by Guidance Note 11)].

While this ISR is intended to provide the relevant information and guidance for listed issuers to prepare their Sustainability Statement, it may not be exhaustive in its coverage. Listed issuers must exercise discernment and diligence when using this ISR. All applicable laws, regulations and existing Listing Requirements of Bursa Malaysia Securities Berhad should be referred to in conjunction with this ISR.

Although care has been taken to present current and pertinent information in this ISR, Bursa Malaysia Securities Berhad does not make any representation or warranty, whether implied or expressed, as to the accuracy, completeness or reliability of the contents of this ISR.

In no event shall Bursa Malaysia Securities Berhad be liable for any decisions made on the basis of the information in this ISR or any other claim, howsoever arising, out of or in relation to this ISR. Bursa Malaysia Securities shall under no circumstances be liable for any type of damages including but not limited to, direct, indirect, special, consequential, incidental, or punitive damages whatsoever or any lost profits or lost opportunities.

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The disclosures presented in this Illustrative Sustainability Report were developed for a hypothetical listed issuer, Build Up Berhad.

# Build Up Berhad

# About Build Up Berhad

Build Up Berhad ("Build Up") is a diversified conglomerate domiciled in Malaysia with an international footprint. Operating in 5 countries, Build Up focuses on 2 key sectors, namely property development and information technology. We are dedicated to escalating our efforts to offer sustainable solutions and products to our customers. This approach will enable us to achieve steady and sustained growth while upholding our commitment to environmental and social responsibility. At present, Build Up is within the Top 200 listed companies on Bursa Malaysia by market capitalisation.

## Our Core Businesses

### Property Development

The Property Development division is primarily involved in the development and renewal of residential and commercial properties as well as township in urban areas.

Revenue:  
**RM1,639** million

Remaining Landbank:  
**1,831** acres

### Information Technology

Our Information Technology division is a leading regional provider of technology consulting and system integration.

Revenue:  
**RM761** million

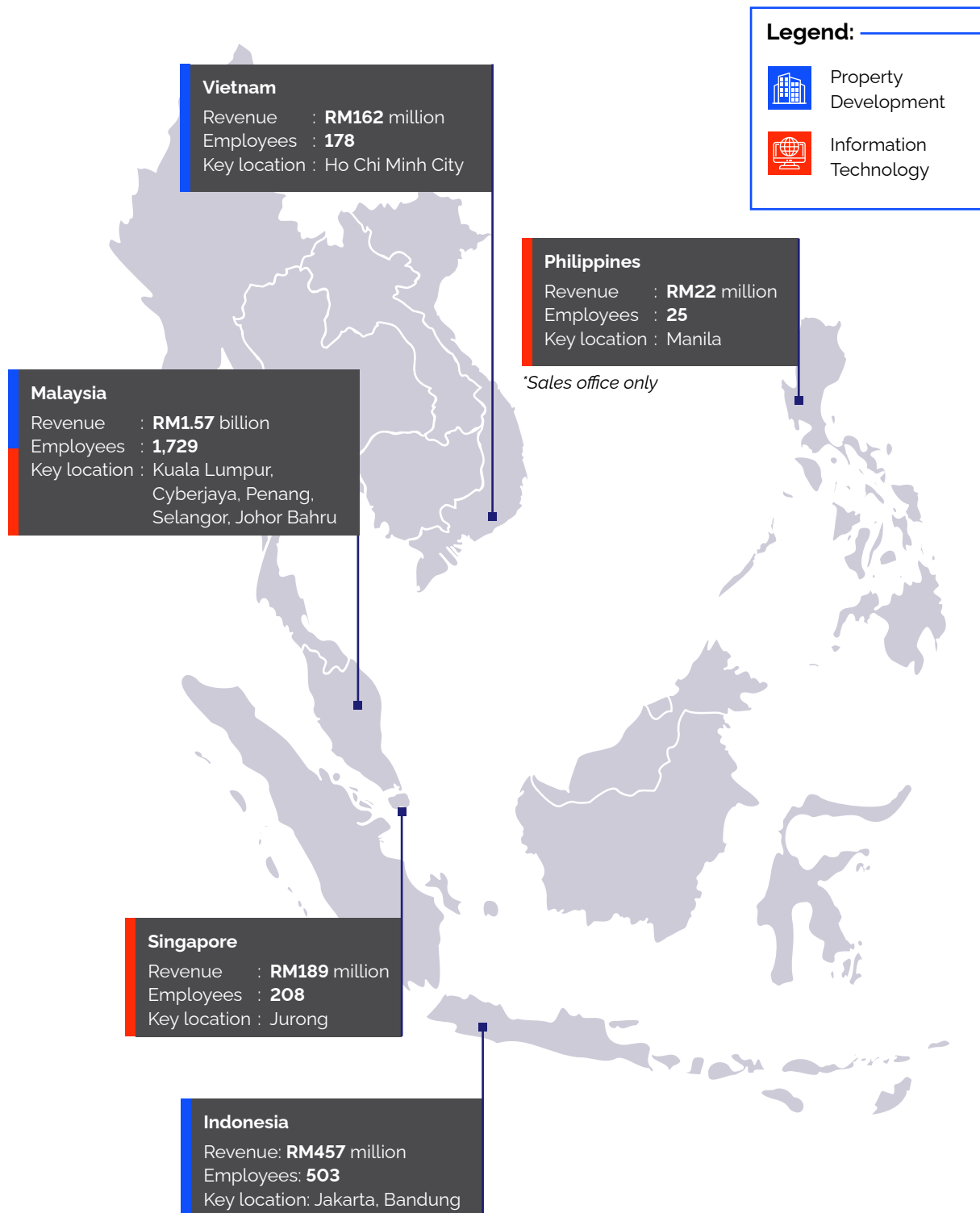
Transformed more than **200**  
business entities across Asia,  
Middle East and Europe

**100%** success  
track record in project  
implementation

Build Up is engaged in all aspects of the property and township development value chain, from design and development to marketing and sales. In addition, our Information Technology division is fully equipped to provide comprehensive support services to customers, encompassing everything from end-to-end solutions to on-demand assistance.

## Where Build Up Operates

Build Up is a regional player operating in Malaysia, Singapore, Indonesia, Philippines, and Vietnam. The Property Development division operates in Malaysia, Indonesia and Vietnam whereas the Information Technology division operates in Malaysia, Singapore and Philippines.

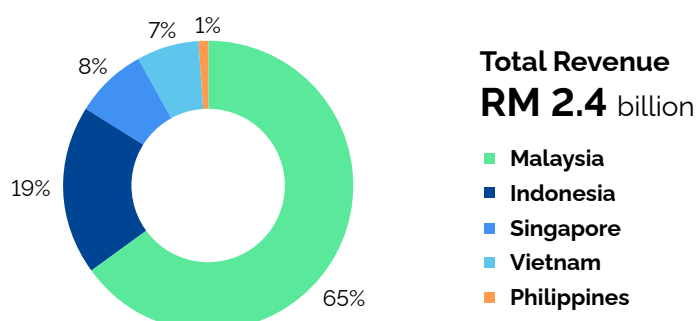


## Property Development

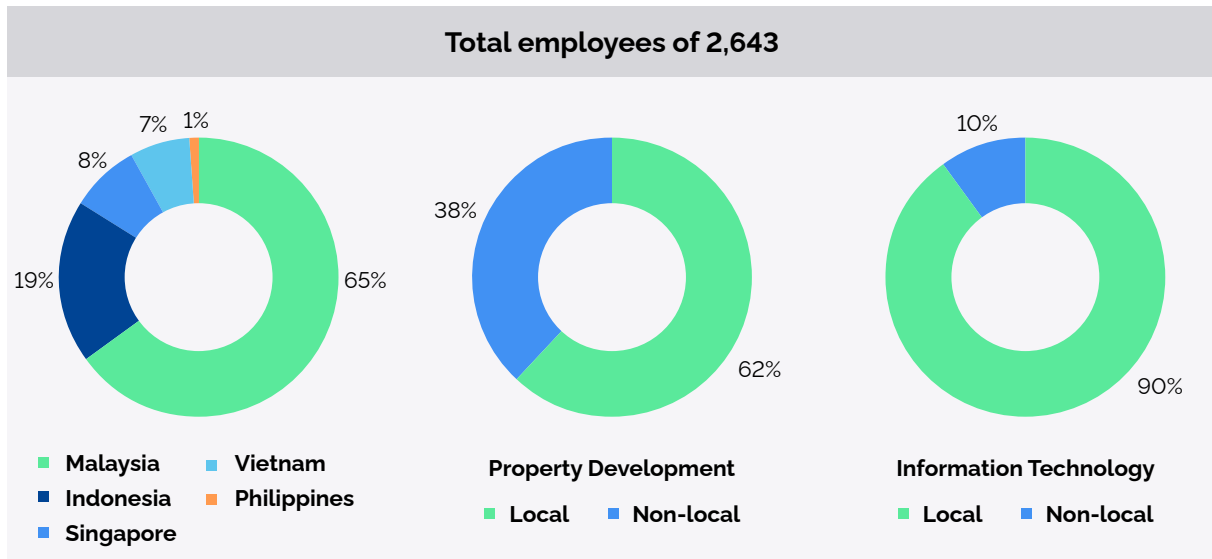
Key Developments	Malaysia	Indonesia	Vietnam
<b>Completed Projects</b>	<ul style="list-style-type: none"> <li>Sapphire Residence, Kuala Lumpur</li> <li>Diamond Residence, Kuala Lumpur</li> <li>Mutiara Cyber Town, Cyberjaya</li> <li>Queenstown, Johor Bahru</li> </ul>	<ul style="list-style-type: none"> <li>Crown Residence, Jakarta</li> <li>Indah Mentari, Bandung</li> </ul>	<ul style="list-style-type: none"> <li>Saigon Premium Villa, District 3 Ho Chi Minh City</li> </ul>
<b>Ongoing Projects</b>	<ul style="list-style-type: none"> <li>Cahaya Mentari, Selangor</li> <li>Cahaya Cemerlang, Selangor</li> <li>Bandar SeaHill Residence, Penang</li> <li>Tanjung Residence, Penang</li> </ul>	<ul style="list-style-type: none"> <li>Anggrek Residence, Jakarta</li> <li>Murni Residence, Jakarta</li> <li>Green Palace, Bandung</li> </ul>	<ul style="list-style-type: none"> <li>Wedgewood Villa, District 12, Ho Chi Minh City</li> <li>Te Te Greenhouse, District 7 Bin Thanh, Ho Chi Minh City</li> </ul>

## Information Technology

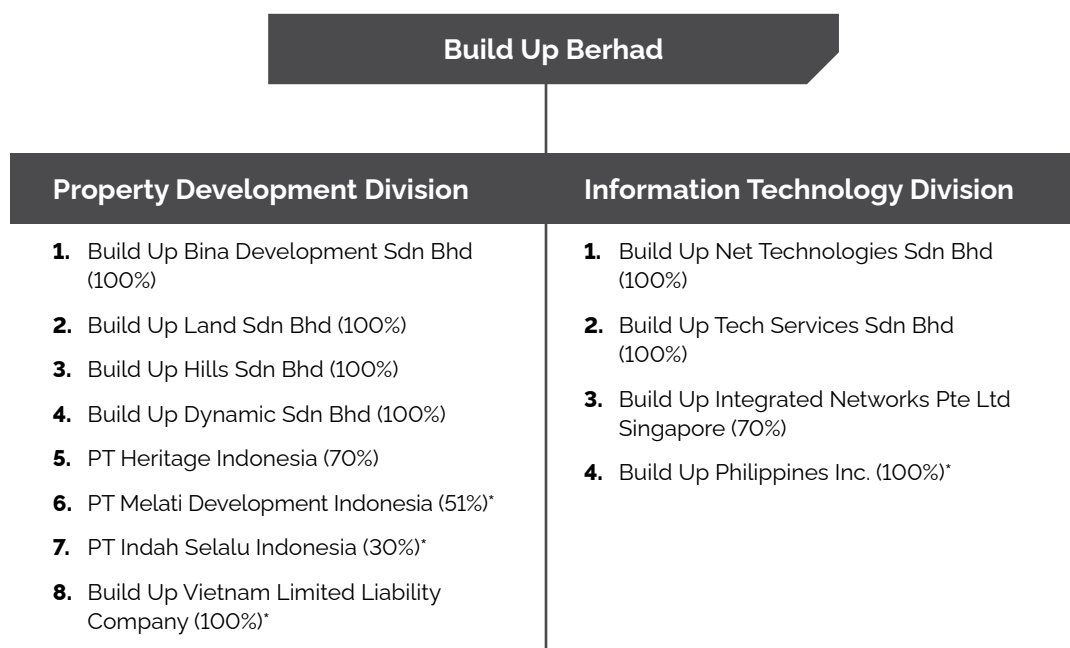
Key Developments	Malaysia	Singapore
<b>Our Data Centres</b>	<ul style="list-style-type: none"> <li>Build Up Net Technologies, Cyberjaya</li> <li>Build Up Tech Services, Penang</li> </ul>	<ul style="list-style-type: none"> <li>Build Up Technologies, Jurong</li> </ul>







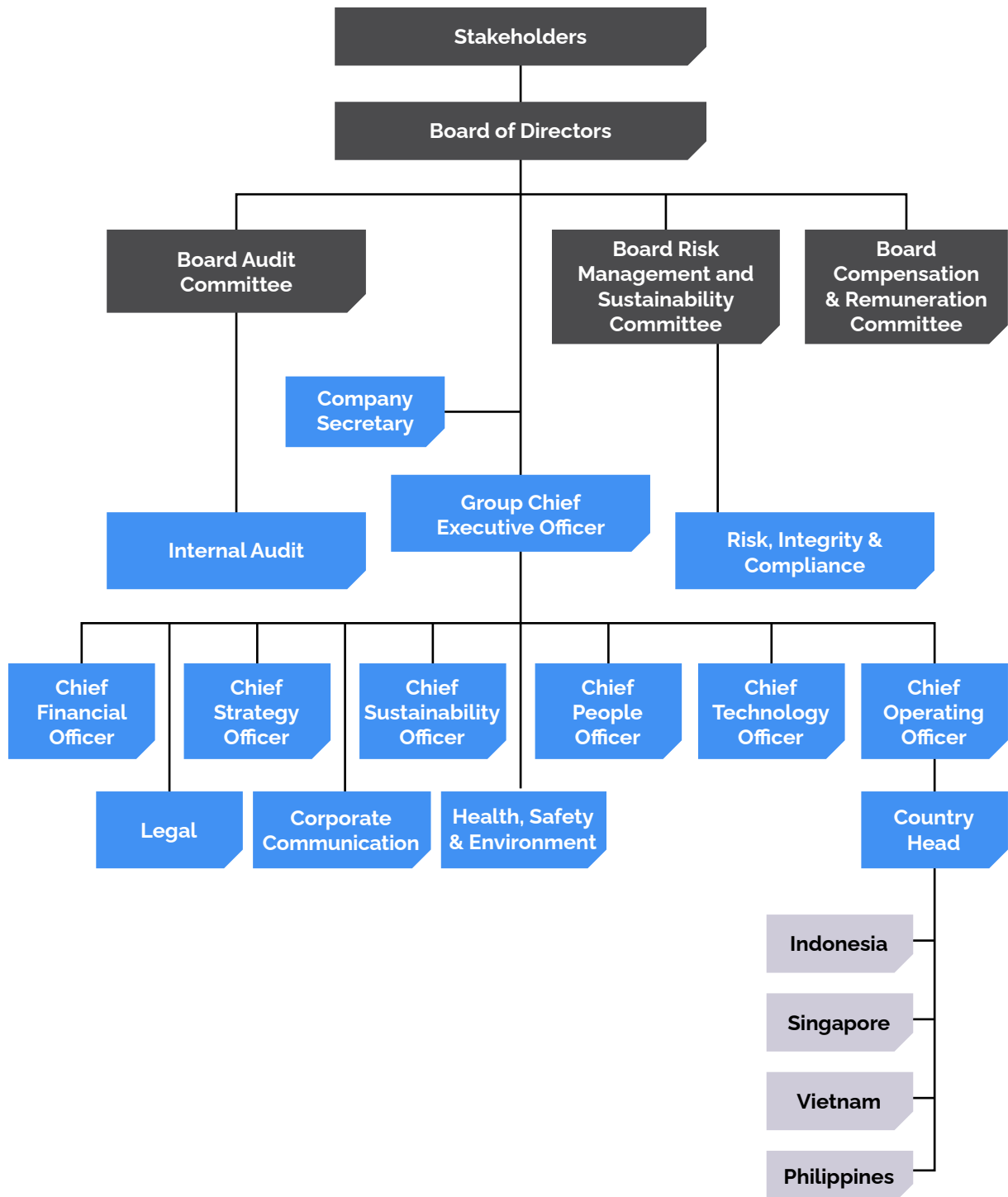
## Group Structure and Operating Entities



Note: \* We have excluded the following from our reporting scope:

- Operations in Philippines as we only have a sales office in the country which has insignificant impact on the Group's overall sustainability performance and progress.
- Operations in Vietnam as it was recently acquired in September 202C. We are in the midst of collating data and will include it in our next cycle of reporting.
- Our joint venture ("JV") and associate companies, namely: PT Melati Development Indonesia and PT Indah Selalu Indonesia as we do not have direct managerial control on them.

## Governance Structure



## Senior Management Team

<b>Azfar Ali</b> Group Chief Executive Officer	<b>Lim Yee Chin</b> Health, Safety & Environment	<b>Indrawan Gunapati</b> Country Head PT Heritage Indonesia
<b>Mark Yeoh</b> Chief Financial Officer	<b>Sarah Abdul Rahman</b> Corporate Communication	<b>Chen Kim</b> Country Head Build Up Integrated Networks Pte Ltd Singapore
<b>Sharmini Ronald</b> Chief Strategy Officer	<b>Ranjeet Singh</b> Legal	<b>Nguyen Linh</b> Country Head Build Up Vietnam Limited Liability Company
<b>Alvin Cheong</b> Chief Sustainability Officer	<b>Zawawi Zakaria</b> Risk, Integrity and Compliance	<b>Angelo De Cruz</b> Country Head Build Up Philippines Inc.
<b>Sofia Zaini</b> Chief People Officer	<b>William Tan</b> Internal Audit	
<b>Jeremy Jarret</b> Chief Technology Officer	<b>Arul Kumar</b> Company Secretary	
<b>Abu Bakar Ahmad</b> Chief Operating Officer		

# About This Report

Build Up Berhad ("Build Up") or ("the Group") is honoured to present our Annual Sustainability Statement ("SS") or ("the Statement") for 202C. This Statement provides an overview of the Group's sustainability performance during the period of 1 January 202C to 31 December 202C ("202C"), unless stated otherwise.

GRI 2-3

Restatement of information for this reporting cycle can be found in the Performance Data table page 74 to 77.

GRI 2-4

## Scope and Basis of Scope

This Statement covers the Group's sustainability performance and progress of our business operations in Malaysia and selected geographical locations we operate in, namely Singapore and Indonesia.

MAIN 4.1

ACE 4.1

We excluded the following from our reporting scope:

- a) operations in the Philippines as we only have a sales office in the country which has minimal impact on the Group's overall sustainability performance and progress, and
- b) operations in Vietnam as it was recently acquired in September 202C.

SRG 2.1a

SRG 2.2a

We have expanded the reporting scope of this Statement to include our operations in Indonesia as the Group managed to obtain full-year 202C data since our acquisition in 202B, as compared to our previous statements which only covers our operations in Malaysia and Singapore.

SRG 2.2b

GRI 2-2

We will strive to include all significant geographical areas that we operate in, within the next 3 years.

## Reporting Frameworks and Standards

This Statement has been developed according to Bursa Malaysia's Listing Requirements, with reference to Bursa Malaysia's Sustainability Reporting Guide (3<sup>rd</sup> Edition), Global Reporting Initiative ("GRI") Standards, Task Force on Climate-related Financial Disclosures ("TCFD") Recommendations, Sustainability Accounting Standards Board ("SASB") Standards and the International Sustainability Standards Boards ("ISSB") Standards.

## Feedback

We welcome and encourage our stakeholders to provide feedback pertaining to this Statement and the issues covered to our Sustainability department at sustainability@buildup.com.my.

GRI 2-3

## Commentaries

### Bursa Malaysia's Listing Requirements

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

#### MAIN 4.1

(b) the scope of the Sustainability Statement and basis for the scope;

**Paragraph 6.2, Guidance Note 11, ACE LR:** In making the Sustainability Statement, a listed corporation must include disclosures on the following:

#### ACE 4.1

(b) the scope of the Sustainability Statement and basis for the scope;

### Bursa Malaysia's Sustainability Reporting Guide (3<sup>rd</sup> Edition)

#### Chapter 4: Scope and Basis of Scope, Disclosure Guidance 1: Scope

##### SRG 2.1a

Question (a): Has the company disclosed the scope of its Sustainability Statement showing clearly which aspects of its operations are included or excluded (be it described by geographical location or business segments, etc.)?

#### Chapter 4: Scope and Basis of Scope, Disclosure Guidance 2: Basis of Scope

##### SRG 2.2a

Question (a): Has the company provided a basis of scope for its Sustainability Statement?

##### SRG 2.2b

Question (b): Has the company provided a clear explanation on whether there are any changes in scope as compared to the previous year?

### GRI Standards

#### GRI 2: General Disclosure 2021

##### GRI 2-2

**Disclosure 2-2:** Entities included in the organization's sustainability reporting

##### GRI 2-3

**Disclosure 2-3:** Reporting period, frequency and contact point

##### GRI 2-4

**Disclosure 2-4:** Restatements of information

# Our Approach to Sustainability

## Sustainability Governance

The Group's sustainability governance structure is integrated into our corporate governance framework. As the Group looks to ensure sustainability is embedded across all aspects of our organisation, the responsibilities of our Board and its committees have been broadened to encompass sustainability elements, as reflected in their respective terms of reference. The Board of Directors is ultimately responsible for the Group's strategic direction on sustainability while being supported by the respective Board Committees by virtue of delegation.

SRG 1.1a

Our Sustainability Steering Committee ("SSC"), chaired by the Chief Sustainability Officer, assists the Board Committees with strategic management of the organisation's material sustainability matters. The SSC is represented by C-suites, senior management, and Country Heads from our different geographical locations.

MCCG 4.5

SRG 1.2a

Under the purview of the SSC is the Sustainability Working Group ("SWG"), represented by members from middle management across our operating countries and units. The SWG is responsible for the day-to-day implementation of the organisation's strategies and plans. Separately, the Sustainability Department acts both as subject matter experts and coordinates the Groups' efforts and performance (including undertaking the materiality assessment process).

SRG 1.3a

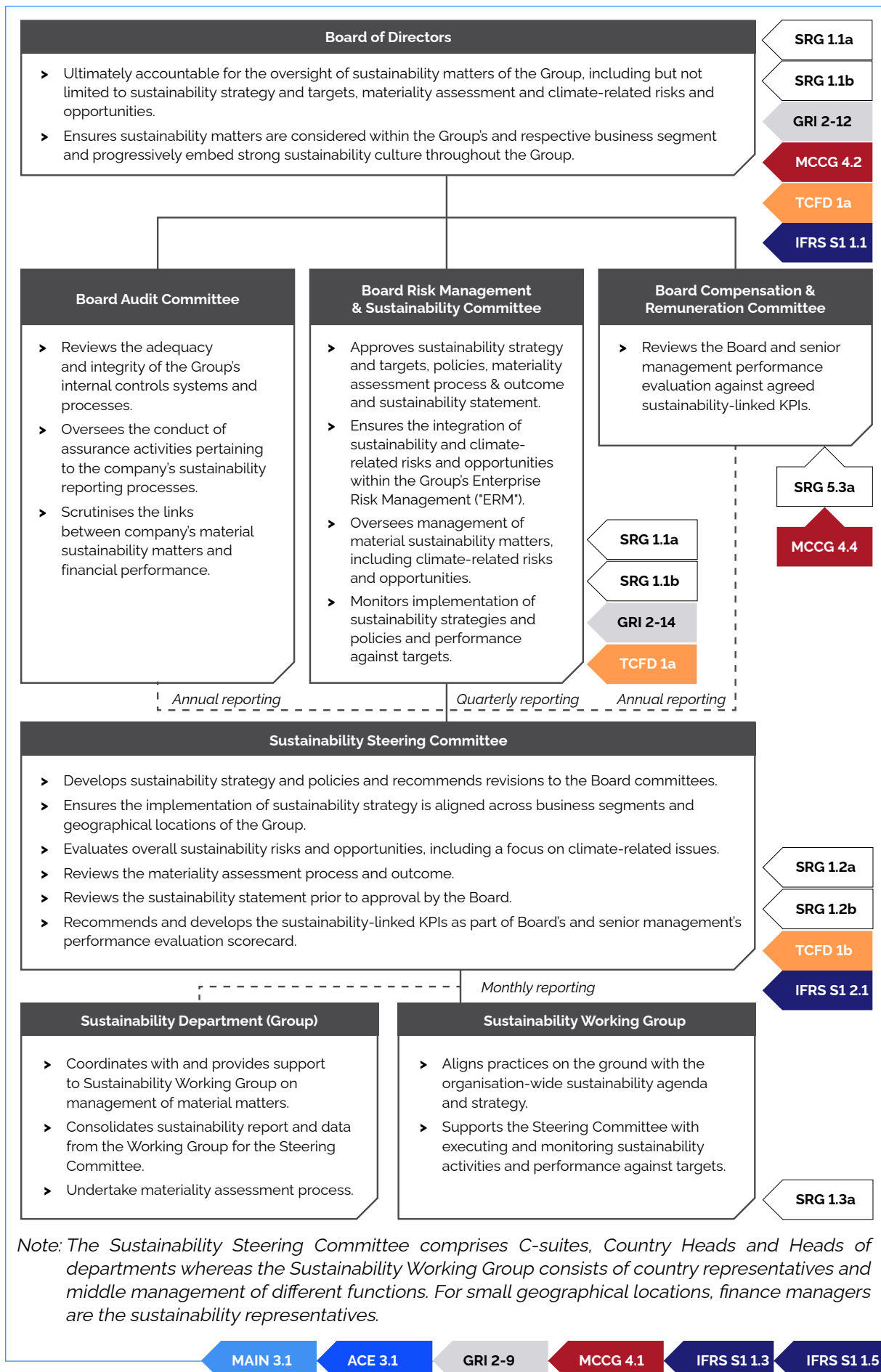
The Board of Directors strive to continuously be equipped with the necessary knowledge regarding the management of sustainability (including climate-related risks and opportunities) to drive informed decision making by attending periodic capacity-building programmes. The Board is also cognisant of ensuring that the required competencies in relation to sustainability is periodically assessed to strengthen board leadership and oversight of sustainability matters. Sustainability-linked Key Performance Indicators ("KPIs") have been established and embedded within the Board's and senior management's performance evaluation scorecard to drive group-wide accountability in steering our sustainability performance.

MCCG 4.3

IFRS S1 1.2

MCCG 4.4

*Note: For further information pertaining to specific sustainability-linked KPIs set for the Board and senior management within their respective annual performance evaluation scorecards, kindly refer to our CG Report 202C.*



## Stakeholder Engagement

Build Up has a broad range of stakeholder groups that have an effect on, or are affected by the Group and our activities. Our key stakeholder groups include shareholders, financiers and investors, government agencies and regulators, customers, employees, community and non-governmental organisations ("NGO"), suppliers and contractors as well as media. They were identified based on their different levels of influence over and dependence on our business.

As a Group, we aim to maintain constructive channels of communication with all our key stakeholder groups. Thus, regular engagements are held through both formal and informal channels. These interactions help us to identify relevant material issues and provide insights into emerging opportunities and risks whilst responding to their needs more effectively.

SRG 3.1b

GRI 2-29

Key Stakeholders	Engagement platforms	Area of interest or concerns	Our response
<b>Shareholders, Financiers &amp; Investors</b>	<b>As needed</b> <ul style="list-style-type: none"> <li>Press releases</li> <li>One-on-one and group meetings</li> </ul> <b>Quarterly</b> <ul style="list-style-type: none"> <li>Financial reports and announcements</li> <li>Investor briefings</li> </ul> <b>Annually</b> <ul style="list-style-type: none"> <li>General Meetings</li> <li>Annual Reports</li> </ul>	<ul style="list-style-type: none"> <li>Business strategies and future plan</li> <li>Dividend payout</li> <li>Group's overall performance</li> <li>Good management and corporate governance</li> <li>Mitigation and adaptation to climate change</li> </ul>	<ul style="list-style-type: none"> <li>Timely updates on the Group's strategy and financial performance via investor briefings and announcements</li> <li>Uphold good governance practices across the Group, and supply chain</li> <li>Outline climate reduction and adaptation strategies</li> <li>Monitor sustainability performance and targets</li> </ul>
<b>Government Agencies &amp; Regulators</b>	<b>Ongoing</b> <ul style="list-style-type: none"> <li>Participation in government and regulatory events</li> <li>Dialogues and thought leadership programmes</li> <li>Print, digital &amp; social media</li> </ul> <b>As needed</b> <ul style="list-style-type: none"> <li>Scheduled/ad-hoc meetings</li> </ul>	<ul style="list-style-type: none"> <li>Regulatory compliance including environmental and social compliance</li> <li>Corporate governance practices</li> <li>Sharing of best practices</li> </ul>	<ul style="list-style-type: none"> <li>Regular review and monitoring of risk register including climate-related risks by the Risk, Integrity and Compliance Department</li> <li>Full compliance with regulatory requirements</li> <li>Adoption of practices outlined in the Malaysian Code on Corporate Governance</li> <li>Support government initiatives</li> </ul>



Key Stakeholders	Engagement platforms	Area of interest or concerns	Our response
<b>Customers</b>	<b>Ongoing</b> <ul style="list-style-type: none"> <li>Customer support channels (i.e., website, mobile app)</li> <li>Print, digital &amp; social media</li> </ul> <b>Quarterly</b> <ul style="list-style-type: none"> <li>Public engagement events (i.e., roadshows, campaigns)</li> </ul> <b>Bi-annual</b> <ul style="list-style-type: none"> <li>Customer Satisfaction Survey ("CSS")</li> </ul>	<ul style="list-style-type: none"> <li>Affordable products and services</li> <li>High-quality products and services</li> <li>Customer experience (i.e., speed of customer service response)</li> <li>Consumer data privacy</li> </ul>	<ul style="list-style-type: none"> <li>Offer affordable products and services through application of Industrialised Building System ("IBS")</li> <li>Adhere to quality standards (i.e., Quality Assessment System in Construction ("QLASSIC"), Green Building Index ("GBI"), ISO 9001)</li> <li>Introduction of Build Up mobile app for prompt response to customers' enquiries</li> <li>Adhere to the Personal Data Protection Act 2010 and achieved ISO 27001:2013 Information Security Management Systems certification</li> </ul>
<b>Employees</b>	<b>Ongoing</b> <ul style="list-style-type: none"> <li>Internal communications (i.e., newsletters, emails)</li> </ul> <b>As needed</b> <ul style="list-style-type: none"> <li>Corporate announcements</li> <li>Workshops and trainings</li> </ul> <b>Monthly</b> <ul style="list-style-type: none"> <li>Employee engagement programmes and events</li> </ul> <b>Annually</b> <ul style="list-style-type: none"> <li>Town halls</li> <li>Employee feedback surveys</li> <li>Employee appraisals</li> </ul>	<ul style="list-style-type: none"> <li>Business growth and strategic direction</li> <li>Inclusive workplace</li> <li>Remuneration and benefits</li> <li>Career development and upskilling opportunities</li> <li>Health and safety at the workplace</li> <li>Work-life balance</li> </ul>	<ul style="list-style-type: none"> <li>Promote transparent communication with employees</li> <li>Provide equal employment opportunities without discrimination</li> <li>Offer industry-competitive benefits and remuneration packages</li> <li>Provide relevant upskilling and development opportunities</li> <li>Ensure compliance with Occupational Safety and Health Act ("OSHA") 1994 through effective Occupational Health and Safety Management Systems ("OHSMS")</li> <li>Flexible work arrangements</li> </ul>

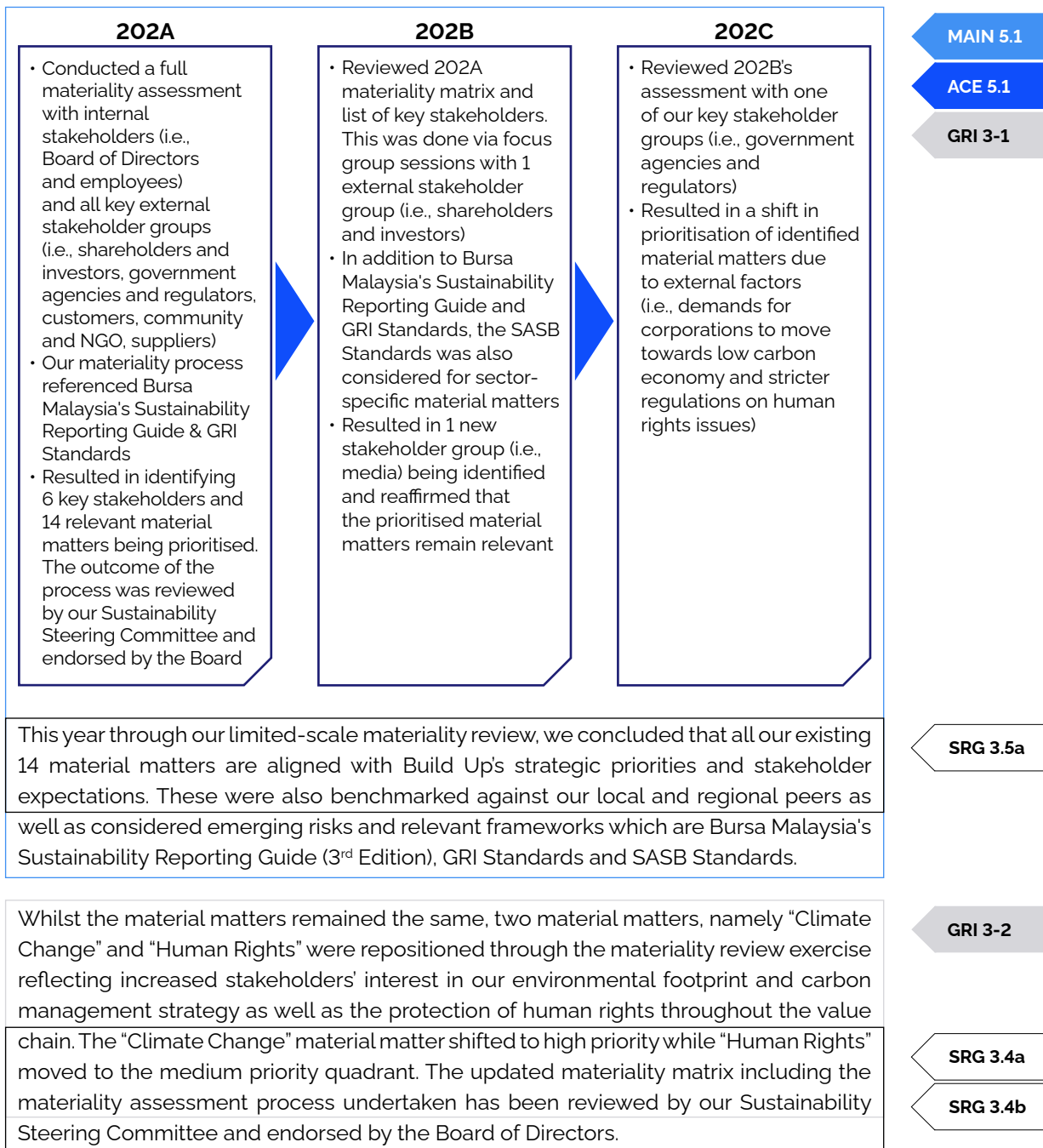
Key Stakeholders	Engagement platforms	Area of interest or concerns	Our response
<b>Community &amp; NGO</b>	<b>Ongoing</b> <ul style="list-style-type: none"> <li>Print, digital &amp; social media</li> </ul> <b>As needed</b> <ul style="list-style-type: none"> <li>Strategic and ad-hoc meetings/visits</li> </ul> <b>Quarterly</b> <ul style="list-style-type: none"> <li>Community impact programmes</li> </ul>	<ul style="list-style-type: none"> <li>Healthy and sustainable built environment</li> <li>Community welfare and continued livelihood</li> </ul>	<ul style="list-style-type: none"> <li>Integrate affordable housing considerations into property development plans</li> <li>Periodic engagements/dialogues with local communities and NGOs to address concerns</li> <li>Investment in education and welfare to improve community well-being</li> </ul>
<b>Suppliers/ Contractors</b>	<b>As needed</b> <ul style="list-style-type: none"> <li>Meetings</li> </ul> <b>Quarterly</b> <ul style="list-style-type: none"> <li>Capacity building programmes</li> </ul> <b>Bi-annual</b> <ul style="list-style-type: none"> <li>Supplier assessment/performance appraisals</li> </ul>	<ul style="list-style-type: none"> <li>Efficient procurement processes</li> <li>Transparency in procurement processes</li> <li>Capacity-building for suppliers</li> <li>Health and safety of contractors' workers</li> </ul>	<ul style="list-style-type: none"> <li>Improve efficiency by digitalisation of procurement processes</li> <li>Emphasis on provision of transparent procurement processes</li> <li>Upskill suppliers/ contractors through capacity-building programmes pertaining to good labour practices</li> <li>Ensure contractors' compliance with the Group's Health and Safety Policies and Procedures</li> </ul>
<b>Media</b>	<b>Ongoing</b> <ul style="list-style-type: none"> <li>Media releases and interviews</li> </ul> <b>As needed</b> <ul style="list-style-type: none"> <li>Advertorial placements</li> </ul> <b>Quarterly</b> <ul style="list-style-type: none"> <li>Media briefings and press kit</li> </ul>	<ul style="list-style-type: none"> <li>Transparency in communicating information and updates on business performance and initiatives, including on ESG and community impact programmes</li> </ul>	<ul style="list-style-type: none"> <li>Engage media regularly through mainstream news and information channels on Build Up's sustainability performance</li> <li>Respond in a timely manner to media enquiries via the Group Corporate Communication department</li> </ul>

## Material Matters

As an organisation, we are cognisant of the fact that our material issues can directly and indirectly impact our ability to create long-term value for our stakeholders. A full scale materiality assessment was conducted in 202A involving both our key internal and external stakeholders to ensure that their interests and concerns are addressed.

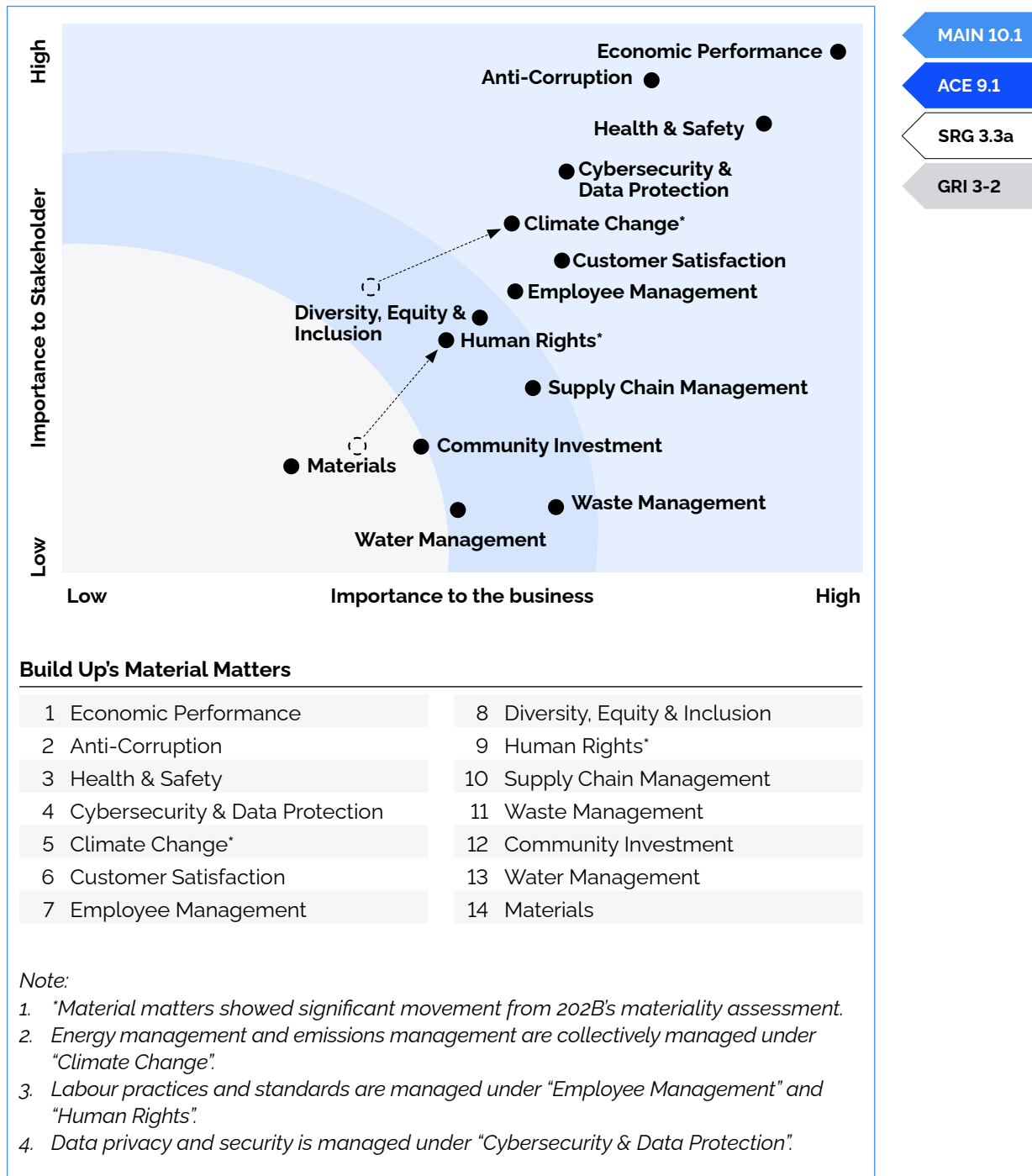
Our material matters influence our business strategy and decision on allocation of resources to material sustainability issues. While we aim to conduct a comprehensive materiality assessment once every 3 years, we undertake an annual review of the relevance of our previously prioritised economic, environment, social and governance impacts arising from our day-to-day activities.

SRG 3.5b



*Note: For further information on our full materiality assessment for 202A, please refer to Additional Information: Material Matters (Appendix) section (page 92 to 93).*

## Build Up's Materiality Matrix 202C



Our revised Materiality Matrix renews our focus on material matters which forms the basis of this report, while the respective indicators facilitate the monitoring and measurement of our sustainability performance. This is further discussed in our Risk Management section on page 19 to 20.

## Risk Management

Build Up aligns our risk management process with the ISO 31000:2018 Risk Management Guidelines to build readiness and resilience through the identification and management of potential risks encountered by our organisation. Our Enterprise Risk Management ("ERM") framework has integrated sustainability and climate-related risks in addition to our corporate, financial and operational risks. We ensure all identified risks stay within our risk appetite through revision and monitoring by designated risk owners and the Risk, Integrity and Compliance department and further deliberation by the Board Risk Management and Sustainability Committee.

IFRS S1 2.2

Material Matters	Risks	Opportunities
<b>Economic Performance</b> page 28	<ul style="list-style-type: none"> <li>Poor financial performance threatens business continuity and loss of investment opportunity</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable financial performance attracts investors and delivers long-term value for all stakeholders</li> </ul>
<b>Anti-Corruption</b> page 29 to 30	<ul style="list-style-type: none"> <li>Poor corporate governance practices may tarnish Build Up's reputation and image</li> </ul>	<ul style="list-style-type: none"> <li>Effective corporate governance practices enhance Build Up's reputation as a trustworthy company amongst stakeholders</li> </ul>
<b>Health &amp; Safety</b> page 31 to 32	<ul style="list-style-type: none"> <li>Accidents and injuries in workplace lead to productivity loss, legal repercussions such as penalties and reputational damage</li> </ul>	<ul style="list-style-type: none"> <li>Strong safety culture with conducive working environment improves employee's wellbeing and productivity, and maintains Build Up's reputation</li> </ul>
<b>Cybersecurity &amp; Data Protection</b> page 33 to 34	<ul style="list-style-type: none"> <li>Cyber threats including breach of customers' data may lead to loss of customer trust and reputational harm</li> </ul>	<ul style="list-style-type: none"> <li>Robust cybersecurity and improved data management protects critical customer data and maintains trust on Build Up</li> </ul>
<b>Climate Change</b> page 35 to 38	<ul style="list-style-type: none"> <li>Non-compliance with existing and emerging climate-related regulations leads to financial penalties</li> <li>Inadequate climate adaptation and mitigation causes physical assets damage, financial loss and business disruption</li> </ul>	<ul style="list-style-type: none"> <li>Secure positioning in low-carbon solutions market to capitalise on the rising demand for low-carbon products and services</li> <li>Effective mitigation and adaptation strategy ensures business continuity</li> </ul>
<b>Customer Satisfaction</b> page 39 to 40	<ul style="list-style-type: none"> <li>Inability to meet customers' expectations impacts customers' confidence and loyalty which leads to lower revenue</li> </ul>	<ul style="list-style-type: none"> <li>Regular customer engagements facilitate continuous improvement to meet customer's expectation</li> </ul>
<b>Employee Management</b> page 41 to 44	<ul style="list-style-type: none"> <li>Disengaged and underdeveloped employees contribute to lower productivity and performance</li> <li>Unattractive benefits and remuneration affect employee's motivation</li> </ul>	<ul style="list-style-type: none"> <li>Effective talent development and upskilling programmes with attractive benefits packages enable us to retain and attract top-quality industry talent as well as contribute to a high-performance culture</li> </ul>

Material Matters	Risks	Opportunities
<b>Diversity, Equity &amp; Inclusion</b> <i>page 45 to 47</i>	<ul style="list-style-type: none"> <li>Discriminatory employment practices damage Build Up's reputation</li> </ul>	<ul style="list-style-type: none"> <li>Inclusive, diverse and empowering work culture attracts talents and brings a range of viewpoints that enhances the quality of decision making</li> </ul>
<b>Human Rights</b> <i>page 48 to 49</i>	<ul style="list-style-type: none"> <li>Breaches in human rights practices lead to regulatory penalties, impact employee retention and culture, and damage reputation</li> </ul>	<ul style="list-style-type: none"> <li>Strong human rights practices reinforce Build Up's reputation as a responsible employer</li> </ul>
<b>Supply Chain Management</b> <i>page 50 to 51</i>	<ul style="list-style-type: none"> <li>Suppliers' and contractors' non-compliance to Build Up's ethical principles, and safety culture exposes the business to operational disruptions</li> </ul>	<ul style="list-style-type: none"> <li>Sound procurement governance attracts and retains credible and skilled suppliers and contractors</li> <li>Regular supplier assessment, including environmental and social assessment upholds Build Up's commitment and high standards towards environmental and social aspects</li> </ul>
<b>Waste Management</b> <i>page 52 to 54</i>	<ul style="list-style-type: none"> <li>Non-compliance with environmental regulations result in consequences from authorities and activists</li> </ul>	<ul style="list-style-type: none"> <li>Waste reduction and increased resource efficiency can result in cost savings for operations</li> </ul>
<b>Community Investment</b> <i>page 55 to 56</i>	<ul style="list-style-type: none"> <li>Business activities that negatively impact communities affect Build Up's social license to operate</li> </ul>	<ul style="list-style-type: none"> <li>Regular engagements through community impact programmes strengthens our relationship with local communities</li> </ul>
<b>Water Management</b> <i>page 57 to 58</i>	<ul style="list-style-type: none"> <li>Poor water management leads to higher costs and potential scarcity of water resources</li> </ul>	<ul style="list-style-type: none"> <li>Efficient water management may reduce operational costs and promote water conservation behavior</li> </ul>
<b>Materials</b> <i>page 59</i>	<ul style="list-style-type: none"> <li>Failure to meet stakeholders' demand for the use of sustainable materials may result in a loss of market share</li> </ul>	<ul style="list-style-type: none"> <li>Opting for sustainable materials enhances Build Up's brand image and attracts more sustainably minded customers and investors</li> </ul>

*Note: For further information on our risk management and climate-related risks, please refer to Statement on Risk Management and Internal Control ("SORMIC") section in our Annual Report 202C and TCFD-aligned Disclosures section (page 67 to 71).*













## Sustainability Framework

Build Up's sustainability framework has been refined to align with our business strategy and is guided by the Group's vision and mission. Through our framework, we aspire to meet the needs of our stakeholders, reduce our environmental impact as well as contribute positively to the local communities where we operate. It outlines our focus areas which are: Delivering Excellence, Responsible Supply Chain, Empowering Our People and the Community, and Caring for the Environment. We aim to deliver the objectives under each focus area by addressing the concerns related to each of our material matters. Accordingly, we have set targets to enable us to accelerate and monitor our sustainability performance. By linking these targets to a performance scorecard, we are able to track our progress and ensure that we are making continuous improvements towards these targets.




## Performance Scorecard


Below are our key targets and progress to date:

Focus Areas	Material Matters	Targets	Current progress against targets
<b>Delivering Excellence</b> 	Customer Satisfaction	Achieve a minimum of 85% for Customer Satisfaction Survey ("CSS") score annually	 Achieved an average score of 89% for CSS in 202C
<b>Responsible Supply Chain</b> 	Human Rights	Zero substantiated complaints concerning human rights violations annually	 2 complaints concerning human rights violations reported in 202C  Complaints were resolved appropriately <i>&lt;refer to page 49&gt;</i>
<b>Empowering Our People and the Community</b> 	Health & Safety	Zero fatality annually	 1 fatality reported in 202C  A thorough investigation was conducted, and prevention measures were defined to avoid recurrence <i>&lt;refer to page 32&gt;</i>
	Diversity, Equity and Inclusion	Increase participation of women in leadership roles at the management level to 30% by 202E	 25% of leadership roles are held by women at the management level in 202C
<b>Caring for the Environment</b> 	Climate Change	Reduce absolute GHG emissions for Scope 1 and Scope 2 by 40% from the 202A baseline by 2030	 Reduced 5.7% absolute GHG emissions for Scope 1 and Scope 2 in 202C
		Reduce energy consumption by 10% from the 202A baseline by 2025	 Reduced 7.4% energy consumption in 202C
	Waste Management	Reduce waste sent to landfill by 30% from 202A baseline by 202E	 Reduced 15% of waste sent to landfill in 202C  Upon reassessment of our current performance, the Group has revised the target to 20% reduction of waste sent to landfill by 202E and will intensify our efforts to meet the set target <i>&lt;refer to page 53&gt;</i>
	Water Management	Reduce water consumption by 15% from the 202A baseline by 2025	 Achieved, ahead of target year. Reduced water consumption by 16.7% in 202C  The Group has revised the target to a 20% reduction of water consumption by 2025 based on our current performance <i>&lt;refer to page 58&gt;</i>

### Legend: progress tracking

 On track to meeting set targets

 Falling short on meeting target for 1 year, review current practices

 Falling short on meeting target for more than 2 years, review and revise targets (if necessary)



## Commentaries

### Bursa Malaysia's Listing Requirements

#### MAIN 3.1

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

- (a) the governance structure in place to manage the economic, environmental and social risks and opportunities ("sustainability matters");

#### MAIN 5.1

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

- (c) material sustainability matters and –
  - (i) how they are identified;

#### MAIN 10.1

**Paragraph 6.3, Practice Note 9, Main LR:** For purposes of paragraph 6.2(c) above, sustainability matters are considered material if they:

- (a) reflect the listed issuer's significant economic, environmental and social impacts; or
- (b) substantively influence the assessments and decisions of stakeholders; and
- (c) fall under the common material sustainability matters as set out in Annexure PN9-A.

#### ACE 3.1

**Paragraph 6.2, Guidance Note 11, ACE LR:** In making the Sustainability Statement, a listed corporation must include disclosures on the following:

- (a) the governance structure in place to manage the economic, environmental and social risks and opportunities ("sustainability matters");

#### ACE 5.1

**Paragraph 6.2, Guidance Note 11, ACE LR:** In making the Sustainability Statement, a listed corporation must include disclosures on the following:

- (c) material sustainability matters and –
  - (i) how they are identified;

#### ACE 9.1

**Paragraph 6.3, Guidance Note 11, ACE LR:** For purposes of paragraph 6.2(c) above, sustainability matters are considered material if they:

- (a) reflect the listed issuer's significant economic, environmental and social impacts; or
- (b) substantively influence the assessments and decisions of stakeholders; and
- (c) fall under the common material sustainability matters as set out in Annexure GN11-A.

## Bursa Malaysia's Sustainability Reporting Guide (3<sup>rd</sup> Edition)

### Chapter 3: Sustainability Governance, Disclosure Guidance 1: Oversight of sustainability matters

#### SRG 1.1a

Question (a): Who is responsible for the oversight of the company's material sustainability matters?

#### SRG 1.1b

Question (b): What is the nature of oversight performed?

### Chapter 3: Sustainability Governance, Disclosure Guidance 2: Strategic management of sustainability matters

#### SRG 1.2a

Question (a): Who is responsible for the strategic management of the company's material sustainability matters?

#### SRG 1.2b

Question (b): What is the nature of strategic management performed?

### Chapter 3: Sustainability Governance, Disclosure Guidance 3: Day-to-day implementation of sustainability matters

#### SRG 1.3a

Question (a): Who performs/implements sustainability-related tasks and initiatives on a day-to-day basis?

### Chapter 5: Materiality Assessment, Disclosure Guidance 1: Identification of sustainability matters

#### SRG 3.1b

Question (b): As part of the company's process for identification of sustainability matters, has the company disclosed the stakeholder groups (both internal and external) engaged for the identification of sustainability matters?

### Chapter 5: Materiality Assessment, Disclosure Guidance 3: Illustration of prioritisation of material matters via a materiality matrix

#### SRG 3.3a

Question (a): Has the company provided an illustration of its prioritised material sustainability matters via a materiality matrix, clearly showing the relative importance of each matter?

### Chapter 5: Materiality Assessment, Disclosure Guidance 4: Review and validation of materiality assessment process and outcome

#### SRG 3.4a

Question (a): Has the company's senior management reviewed and/or approved the process and outcome of the materiality assessment undertaken?

#### SRG 3.4b

Question (b): Has the company's board approved/validated/endorsed the outcome of the materiality assessment undertaken?

## Chapter 5: Materiality Assessment, Disclosure Guidance 5: Frequency of materiality assessment process review

### SRG 3.5a

Question (a): Has the company disclosed the nature of assessment undertaken for the reporting year (full or limited scale) as well as underlying justifications?

### SRG 3.5b

Question (b): Has the company disclosed the frequency of undertaking materiality assessment?

## Chapter 8: Performance Targets, Disclosure Guidance 3: Linking performance targets to remuneration

### SRG 5.3a

Question (a): Are sustainability-related performance targets set by the company linked to the remuneration of the following:

- i) Those charged with the oversight of sustainability within the company
- ii) Those charged with strategic management of sustainability within the company

## Malaysian Code on Corporate Governance

### MCCG 4.1

**Practice 4.1:** The board together with management takes responsibility for the governance of sustainability in the company including setting the company's sustainability strategies, priorities and targets. The board takes into account sustainability considerations when exercising its duties including among others the development and implementation of company strategies, business plans, major plans of action and risk management. Strategic management of material sustainability matters should be driven by senior management.

### MCCG 4.2

**Practice 4.2:** The board ensures that the company's sustainability strategies, priorities and targets as well as performance against these targets are communicated to its internal and external stakeholders.

### MCCG 4.3

**Practice 4.3:** The board takes appropriate action to ensure they stay abreast with and understand the sustainability issues relevant to the company and its business, including climate-related risks and opportunities.

### MCCG 4.4

**Practice 4.4:** Performance evaluations of the board and senior management include a review of the performance of the board and senior management in addressing the company's material sustainability risks and opportunities.

### MCCG 4.5

**Step Up 4.5:** The board identifies a designated person within management, to provide dedicated focus to manage sustainability strategically, including the integration of sustainability considerations in the operations of the company.

## GRI Standards

### GRI 2: General Disclosure 2021

#### GRI 2-9

**Disclosure 2-9:** Governance structure and composition

#### GRI 2-12

**Disclosure 2-12:** Role of the highest governance body in overseeing the management of impacts

#### GRI 2-14

**Disclosure 2-14:** Role of the highest governance body in sustainability reporting

#### GRI 2-29

**Disclosure 2-29:** Approach to stakeholder engagement

### GRI 3: Material Topics 2021

#### GRI 3-1

**Disclosure 3-1:** Process to determine material topics

#### GRI 3-2

**Disclosure 3-2:** List of material topics

## TCFD Recommendations

#### TCFD 1a

**Governance, Recommended Disclosure (a):** Describe the board's oversight of climate-related risks and opportunities.

#### TCFD 1b

**Governance, Recommended Disclosure (b):** Describe management's role in assessing and managing climate-related risks and opportunities.

## IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information

#### IFRS S1 1.1

**Paragraph 27,** To achieve this objective, an entity shall disclose information about:

- (a) the governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of sustainability-related risks and opportunities. Specifically, the entity shall identify that body(s) or individual(s) and disclose information about:
  - (i) how responsibilities for sustainability-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s);

#### IFRS S1 1.2

- (ii) how the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to sustainability-related risks and opportunities;

**IFRS S1 1.3**

- (iii) how and how often the body(s) or individual(s) is informed about sustainability-related risks and opportunities;

**IFRS S1 1.5**

- (v) how the body(s) or individual(s) oversees the setting of targets related to sustainability-related risks and opportunities, and monitors progress towards those targets (see paragraph 51), including whether and how related performance metrics are included in remuneration policies.

**IFRS S1 2.1**

**Paragraph 27.** To achieve this objective, an entity shall disclose information about:

- (b) management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities, including information about:
  - (i) whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee; and

**IFRS S1 2.2**

- (ii) whether management uses controls and procedures to support the oversight of sustainability-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions.

**IFRS S1 3.1**

**Paragraph 51.** An entity shall disclose information about the targets it has set to monitor progress towards achieving its strategic goals, and any targets it is required to meet by law or regulation. For each target, the entity shall disclose:

- (a) the metric used to set the target and to monitor progress towards reaching the target;

**IFRS S1 3.2**

- (b) the specific quantitative or qualitative target the entity has set or is required to meet;

**IFRS S1 3.3**

- (c) the period over which the target applies;

**IFRS S1 3.4**

- (d) the base period from which progress is measured;

**IFRS S1 3.6**

- (f) performance against each target and an analysis of trends or changes in the entity's performance; and

**IFRS S1 3.7**

- (g) any revisions to the target and an explanation for those revisions.

# Management Approach for Material Matters

MAIN 10.1

ACE 9.1

SRG 4.1a

GRI 3-3

## Economic Performance

### Related UNSDGs:



### Why is this important?

Build Up's financial performance supports the creation of long-term value and the Group's sustainability agenda. We are mindful of our responsibilities to create decent employment opportunities and promote economic development within the local communities. Our ultimate goal is to ensure long-term resilience by leveraging our assets and sharing the generated wealth with our stakeholders.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

Build Up's approach to sustaining and achieving good economic performance is by executing our business strategy, which includes staying abreast with market trends, maintaining a healthy balance sheet and strong cash flow, pursuing technological advancement, mitigating identified risks relevant to our business as well as pursuing market expansion through diversification into new geographies.

MAIN 6.2.2

ACE 6.2.2

SRG 4.1c

### Our performance

This year, the Group recorded a total revenue of RM2.4 billion, with the majority of 53% derived from our Property Development division in Malaysia. Build Up continuously generates wealth for our stakeholders, as shown in the table below.

	202A RM	202B RM	202C RM
Economic value generated (i.e., revenue and other income)	1,987,123,754	2,134,445,678	2,407,882,223
Economic value distributed:			
• Operating costs	1,544,345,212	1,755,902,001	1,936,481,451
• Employee wages and benefits	47,012,345	49,534,789	53,229,234
• Payment to providers of capital (i.e., dividend and financing cost)	39,781,112	42,515,623	44,512,179
• Payment to government (i.e., tax)	31,102,345	32,402,113	34,907,234
• Community investment	1,901,678	2,236,079	2,499,562
Economic value retained	322,981,062	251,855,073	336,252,563

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.3a

GRI 201-1

*Note: The financial results presented in the table are derived from the audited financial statement and our Management Discussion and Analysis, which are available for reference in our Annual Report 202C.*

## Anti-Corruption

### Related UNSDGs:



### Why is this important?

Build Up upholds high standards of business ethics and compliance across the Group as a reflection of our core values: Honesty, Integrity, and Operational Excellence. This is crucial for us to protect the interests of both the business and stakeholders while building trust and reinforcing confidence of our stakeholders in us.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

The Board and senior management remain committed to conducting business with integrity, guided by our Code of Conduct ("CoC"). The CoC communicates Build Up's fundamental principles and guidelines to all employees, including Directors in addressing ethical issues and carrying out their responsibilities. The Group's zero-tolerance stance against corruption is outlined in our Anti-Bribery and Corruption ("ABC") Policy, which is regularly reviewed to ensure alignment with the Malaysian Anti-Corruption Commission ("MACC") Act 2009. Additionally, Build Up is pursuing ISO 37001:2016 Anti-Bribery Management System ("ABMS") certification to further demonstrate our commitment to ensuring good governance.

All new joiners undergo an induction programme where they are required to familiarise themselves with the Group's CoC, ABC Policy, and other accompanying policies and procedures. Once they have completed the induction, all employees must also complete a mandatory annual training module and an examination to attest that they have thoroughly understood the policies and procedures, with a minimum passing score of 70%.

Our suppliers are also subject to ethical conduct and anti-bribery and corruption guidelines as entailed within the CoC for Third Parties and ABC Policy. All suppliers will need to sign a declaration indicating their agreement to abide by the guidelines and policies set forth by Build Up in their business dealings.

Build Up has established a dedicated whistleblowing channel under the Whistleblowing Policy, which allows employees and external stakeholders to report improprieties confidentially through email, telephone, or mail. The Group has made our CoC, ABC Policy and Whistleblowing Policy available on our corporate website and company intranet to ensure they are accessible to all stakeholders.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

*Note: For further information on our anti-bribery and corruption measures, kindly refer to our Statement on Risk Management and Internal Control ("SORMIC") of the Annual Report 202C.*

## Our performance

### Corruption risk assessment

This year we have undertaken a corruption risk assessment that covers all of our operations, both in the Property Development and Information Technology segments.

	202A	202B	202C
Percentage of operations that underwent corruption risk assessments	100%	100%	100%

### Corruption-related training

All employees have completed the necessary annual training in 202C. Additionally, employees are required to complete an annual integrity pledge to indicate compliance.

Employee Category	Completion Rate (%)		
	202A	202B	202C
Management	100	100	100
Executive	100	100	100
Non-executive/Technical Staff	94	100	100

*Note: General Workers receive classroom training and are not required to complete the examination.*

### Corruption incidents

As of 31 December 202C, we recorded zero incidents of corruption across Build Up's business operations.

	202A	202B	202C
Number of confirmed corruption incidents	0	0	0

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.3a

GRI 205-1

GRI 205-2

GRI 205-3



## Health & Safety

### Related UNSDGs:



### Why is this important?

We prioritise the health and safety of our employees and contractors in our business operations and workplaces. By ensuring a healthy, safe and conducive workplace, we aim to prevent injuries and illnesses among those working within our premises, which ultimately leads to increased efficiency and output.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

Our Group Health and Safety Policy outlines how our business operations are conducted in a safe manner, through the implementation of various measures and controls by all levels of our workforce. We have established the Group's Occupational Health and Safety Management Systems ("OHSMS"), which conforms to the Occupational Safety and Health ("OSHA") Act 1994 and ISO 45001:2018 Occupational Health and Safety Management System standards. Health, Safety and Environment ("HSE") Working Committees are present in all divisions and locations and quarterly meetings are conducted with representatives from the Board to ensure that performance and directions are discussed at all levels.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

GRI 403-1

Furthermore, we establish joint management-worker health and safety committees at project sites to enable workers from all levels to participate in discussing Occupational Health and Safety ("OHS") matters, including hazards identification, risk assessment, and idea contribution to manage or reduce risk levels. Throughout the project's life cycle, we implement specific risk management processes, including the design and pre-construction stages, to identify hazards, lower risks, and improve health and safety management for all existing and potential projects.

GRI 403-4

The Hazard Identification, Risk Assessment, and Risk Control ("HIRARC") process is regularly reviewed and assessed to ensure that it remains relevant in identifying all potential hazards and providing effective mitigation measures. We foster a reporting culture where workers can report incidents without fear of reprisal. An incident reporting line has been established to communicate information for management's attention.

At Build Up, we offer medical care to our employees, including mandatory health screening and annual health surveillance. We provide designated medical transport at our construction sites to ensure easy access for employees to seek medical attention when necessary. Additionally, we provide health and safety training at the point of recruitment, on-the-job, and regular refresher training to employees and contractors. Our training programmes include both knowledge-based and skills-based training, covering topics such as emergency response, hazard and risk management, as well as health awareness. These programmes are reviewed on a regular basis to ensure their relevance.

GRI 403-5

## Our performance

### Health and safety trainings

In 202C, a total of 832 participants were given various trainings on health and safety standards.

	202A	202B	202C
Number of employees and contractors trained on health and safety standards	645	728	832

### Work-related injuries

Build Up's ultimate goal is to ensure that all workers return home safely at the end of the day, which is why we strive to maintain zero fatalities annually by preventing and minimising workplace incidents.

Unfortunately, we had 1 fatality in 202C involving a contractor at our Indonesia operations who fell from height. We conducted a detailed investigation to identify the cause and any systemic failures and have taken corrective measures. These measures include implementing stricter safety measures such as hard barricades and safety nets, retraining employees and contractors on working safely at heights, and ensuring full adherence to the SOP with stricter controls and supervision.

We remain committed to continuously strengthen our preventive measures to avoid any recurrence in the future.

	202A		202B		202C	
	Employee	Contractor	Employee	Contractor	Employee	Contractor
<b>Total Hours Worked</b>	86,400	3,367,492	98,400	3,225,712	120,000	4,418,400
<b>Number of Fatalities</b>	0	1	0	0	0	1
<b>Number of Lost Time Injuries</b>	0	2	0	1	0	0
<b>Lost Time Incident Rate ("LTIR")</b>	0	0.12	0	0.06	0	0

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.3a

SRG 4.2d

SRG 5.1a

SRG 5.2a

SRG 5.2b

GRI 403-9

## Cybersecurity & Data Protection

### Related UNSDGs:



### Why is this important?

In recent years, we have seen the acceleration of various trends revolving around remote working, e-commerce and automation, which has propelled the adoption of digital technologies and infrastructure. However, it has also made data more susceptible to cybersecurity risks. Consequently, we have a responsibility to manage the growing threat of cyber-attacks on Build Up, including protecting our customers' sensitive information, to prevent any leaks, threats or loss of customer information.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

The Group continues to strengthen its cybersecurity measures through strict adherence to our Data Privacy Policy. Our policy is developed in accordance with the Personal Data Protection Act ("PDPA") 2010 and aligned with General Data Protection Regulation ("GDPR") and Asian Pacific Economic Cooperation ("APEC") Privacy Framework. We maintain a robust cybersecurity framework that is embedded within our operations and processes, adhering to all regulatory requirements in the different regions where we operate. Furthermore, we have achieved ISO 27001:2022 Information Security Management Systems certification to further strengthen our management efforts.

At Build Up, managing data and security is an integral part of our ERM framework. We conduct regular reviews to ensure that our data privacy and security controls and processes are operating effectively. We take reasonable measures to ensure we collect data by lawful means, and that we are transparent about how data is gathered, used, and secured. We have also obtained the necessary consent when handling our customers' data which is stored on our centralised customer relationship management ("CRM") system and only authorised personnel are granted access. User access and activities are regularly reviewed to prevent unauthorised access or misuse of authority. Additionally, our data retention and destruction policy guides us in keeping data for as long as necessary and securely disposing it when it is no longer needed.

Throughout 202C, we implemented a range of cybersecurity measures, including network penetration tests conducted by external specialists to identify and address any vulnerabilities in our systems and processes. Furthermore, we continue to educate our employees on data protection and privacy. They are required to complete annual mandatory online training which comprehensively covers their responsibility to safeguard data. Additionally, we regularly conduct phishing email simulation exercises to enhance their ability in identifying and responding to such emails.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

SASB TC-SI-220a.1

SASB TC-SI-230a.2

## Our performance

As of 31 December 202C, there were zero substantiated complaints concerning breaches in customer privacy or data loss.

	202A	202B	202C
Number of substantiated complaints concerning breaches in customer privacy or data loss	0	0	0

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.3a

GRI 418-1

SASB TC-SI-230a.1

## Climate Change

### Related UNSDGs:



### Why is this important?

The Group acknowledges that our energy consumption and GHG emissions contribute to climate change impacts. We recognise that as a corporate citizen, it is our responsibility to reduce our carbon footprint while also embracing opportunities that unfold while making the transition to a low-carbon economy.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

Build Up aims to reduce our environmental footprints and establish operational resilience to deliver long-term value to our business, stakeholders and communities. We are guided by our Environmental Policy, which outlines the Group's objective to effectively manage and minimise the impacts arising from our business operations.

As part of our efforts to mitigate climate change, Build Up has committed to achieving carbon neutrality by 2030 with an aspiration to be net zero by 2050. We have developed a Climate Transition Strategy which complements our policy to guide us on this journey. Our Climate Transition Strategy is largely focused on the three (3) strategic pillars:

MAIN 6.2.1

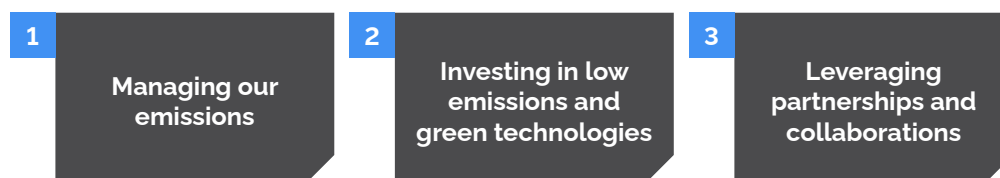
MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

### Climate Transition Strategy



### Pillar 1: Managing our emissions

#### a) Improving energy efficiency in our premises

We continuously strive to improve our energy use and efficiency through the following initiatives:

Key Initiative	Description
Retrofit office buildings	We have started to replace traditional lighting with energy-saving LED lights and install new inverter-type air conditioners for our offices in Malaysia and Singapore
Centralised cooling system	Our centralised cooling system is designed to meet the cooling load demand during both peak and off-peak hours, aligning with our operating hours
Conduct energy audit	We regularly conduct energy audits of our buildings and facilities which involve a detailed analysis of energy consumption patterns, identification of areas of energy waste, and recommendations for energy-saving measures

SASB IF-RE-130a.5

*b) Integrating sustainable practices into our developments*

We acknowledge that sustainable building designs and practices can help to mitigate climate change. Therefore, we have begun pursuing the Leadership in Energy and Environmental Design ("LEED") and Green Building Index ("GBI") certifications for our developments in Malaysia. As of 202C, both Sapphire Residence and Diamond Residence have achieved LEED Gold certification. Going forward, we will roll-out this initiative in phases in countries where Build Up operates.

We have also adopted the Industrialised Building System ("IBS") in the development of our projects, where feasible, to minimise the environmental impacts of our operations. The energy-efficient features like insulation, air sealing, and efficient HVAC systems can be integrated into the prefabricated components of IBS. This integration enhances energy performance and helps decrease energy consumption within the building. In addition, the Building Management System ("BMS") is also employed in our managed buildings to ensure continuous monitoring of energy consumption. The system provides real-time feedback, enabling the Facilities Management Team to respond quickly.

**Pillar 2: Investing in low emissions and green technologies**

*a) Increasing deployment of renewable energy*

The Group is increasingly relying on renewable energy from solar rooftop photovoltaic ("PV") panels installed at our data centres. Additionally, we are currently exploring opportunities in the solar business and assessing the feasibility of integrating it within our developments, based on the viability of capturing sunlight and economic feasibility.

*b) Enabling sustainable transformation through innovative solutions*

As part of our dedication to helping clients in meeting their climate change commitments, we are actively investing in and developing IT solutions that enable them to monitor, track, and reduce their carbon footprint. In line with this, Build Up is creating an internal prototype to ensure the effectiveness and reliability of our IT solutions while also managing our own emissions. This prototype will aid us as an organisation in achieving our carbon neutrality and net zero commitments.

By leveraging cutting-edge technology, we aim to utilise the necessary tools to make informed decisions and take measurable actions towards a sustainable future, both for the organisation and our customers, in real-time.

**Pillar 3: Leveraging partnerships and collaborations**

Build Up aims to enhance its customer portfolio and expand its market presence in diverse geographic regions by forming strategic alliances with prominent international and local industry players in the development of efficient, zero-carbon buildings. This approach not only unlocks new business opportunities but also ensures that we remain at the forefront of sustainable building practices. Through close collaboration with industry experts, we can foster the creation of pioneering and innovative solutions that cater to the evolving needs of our customers while aligning to our environmental objectives.

**Task Force on Climate-Related Financial Disclosures**

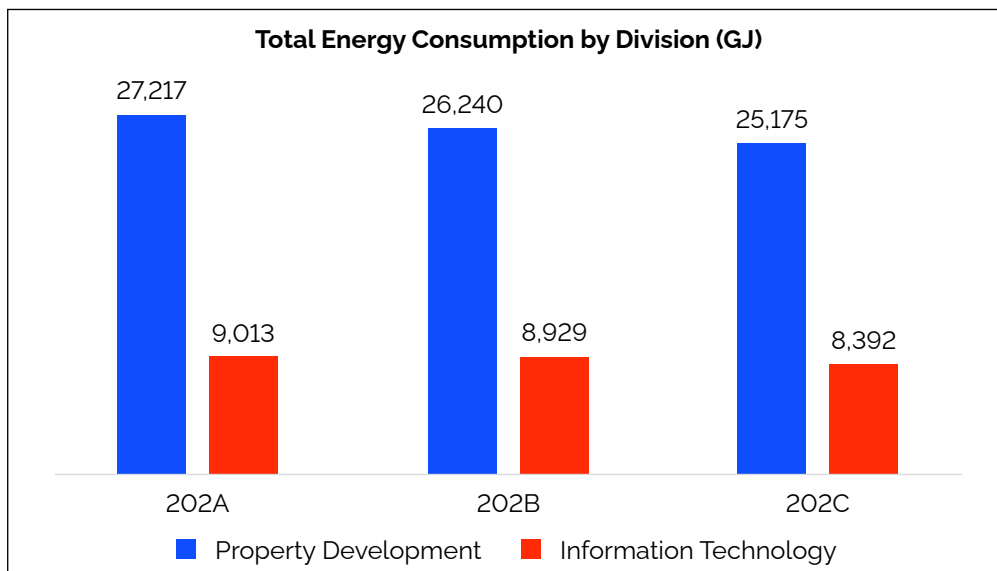
This year, we are proud to disclose our inaugural climate report and disclosures through the adoption of the Task Force on Climate-Related Financial Disclosures ("TCFD") Recommendations which has been aligned to our climate strategy and targets. We have begun developing our internal capabilities address the Recommendations of the TCFD in order to manage critical climate-related risks and opportunities within our organisation in a more comprehensive and strategic manner.

*Note: For further information, please refer to our TCFD-aligned Disclosures section (page 67 to 71).*

## Our performance

### Energy consumption

We have set a target of 10% reduction in energy consumption by 2030 from our 202A baseline. This year, the total energy consumption recorded was 33,567 GJ with a 4.6% reduction from 202B.



We have started using renewable energy in recent years by gradually installing solar panels on our data centers to reduce our dependency on electricity generated from fossil fuels. In 202C, we successfully generated 884 GJ of solar power, compared to 768 GJ the previous year, due to the expansion of our existing solar PV systems.

### Carbon emissions

Build Up aims to reduce 40% of our absolute GHG emissions for Scope 1 and Scope 2 by 2030. In 202C, our total emissions for the year amounted to 6,452 tCO<sub>2</sub>-e for Scope 1 and 3,895 tCO<sub>2</sub>-e for Scope 2, representing a 3.5% reduction in total GHG emissions for Scope 1 and Scope 2 from the previous year.

Additionally, we have started tracking and monitoring our Scope 3 emissions, specifically for business travel and employee commuting. This year, these emissions amounted to 574 tCO<sub>2</sub>-e. We will establish a target for our Scope 3 emissions once we have further refined our emissions data for all our operations.

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.2d

SRG 4.3a

SRG 5.1a

SRG 5.2a

GRI 302-1

GRI 302-4

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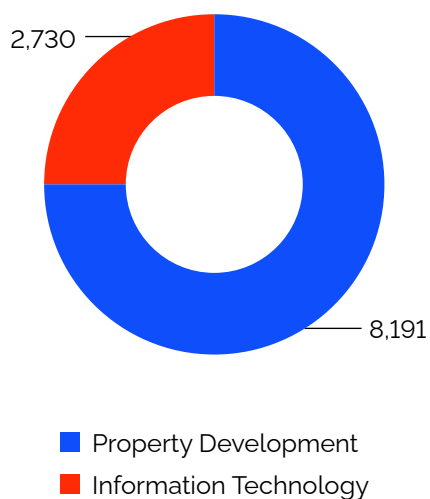
GRI 305-1

GRI 305-2

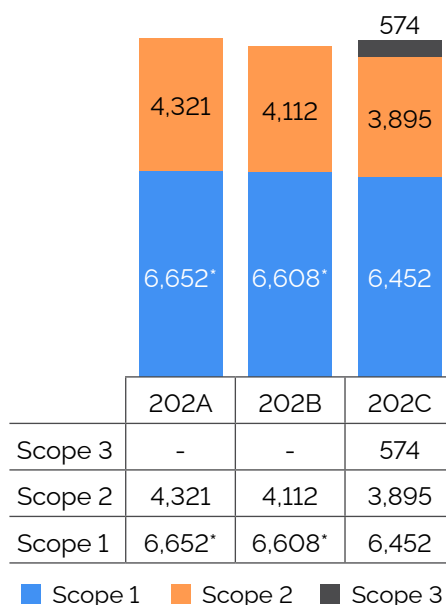
GRI 305-3

GRI 305-5

**Total Emissions by Division (tCO<sub>2</sub>-e)**



**Total Emissions by Scope (tCO<sub>2</sub>-e)**



SRG 4.3b

\* Restated due to the application of latest emissions factor

**Note:**

1. Our calculation methodology is based on the GHG Protocol Corporate Accounting and Reporting Standard using the operational control consolidation approach.
2. Scope 1 and Scope 3 emissions factors are sourced from the GHG Conversion Factors for Company Reporting version 2.0 (2022), published by the UK Department for Environment, Food & Rural Affairs ("DEFRA") and Embodied Carbon: The Inventory of Carbon and Energy version 3.0 (2019), published by BSRIA.
3. Scope 2 emissions factors for electricity grids in Peninsular Malaysia, Sabah and Sarawak are sourced from the 2017 CDM Electricity Baseline for Malaysia published by Malaysian Green Technology and Climate Change Corporation ("MGTC").
4. The GHG emissions data for Scope 1 and 2 has been assured externally, whereas the Scope 3 data has been internally reviewed. We will undertake independent assurance for all of our GHG emissions data (Scope 1, Scope 2 and Scope 3) in the future.



## Customer Satisfaction

### Related UNSDGs:



### Why is this important?

The Group acknowledges that customer satisfaction and loyalty are key factors in achieving long-term success and maintaining our reputation as one of the leading developer and service provider in the market. With this in mind, we strive to enhance customer satisfaction by considering their feedback and ensuring that high quality standards are met across all our products and services.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

We are committed to enhancing our customers' experience by engaging with them through multi-faceted channels, including obtaining periodic feedback and conducting our annual Customer Satisfaction Survey ("CSS"). These efforts enable us to gain insights into our customers' needs and expectations and enhance our products and services offerings. The CSS covers a range of topics, including but not limited to:



MAIN 6.2.2

ACE 6.2.2

SRG 4.1c

We have adopted and benchmarked our developments against the Quality Assessment System in Construction ("QLASSIC") reflecting our commitment to excellence. This assessment is a method for evaluating and measuring the quality of construction work based on the Construction Industry Standard ("CIS") 7:2006.

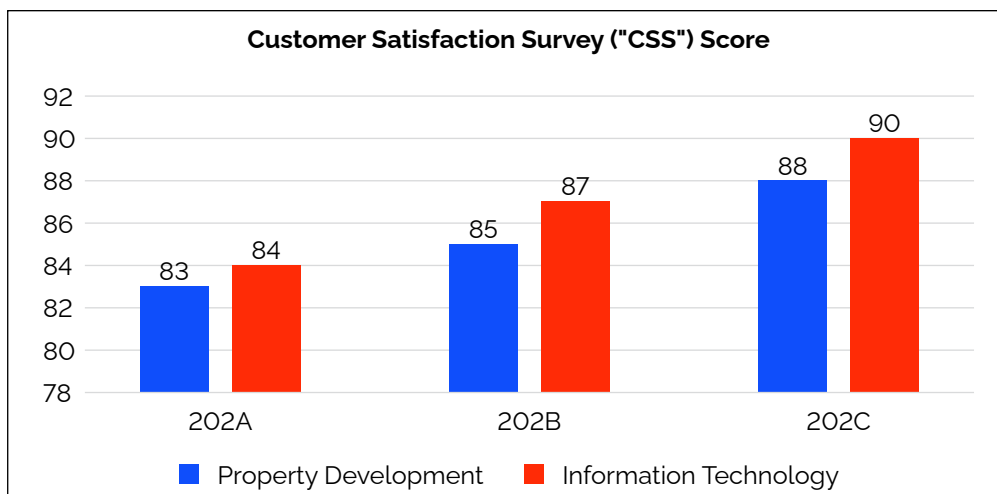
Our IT Accounts Manager serves as the focal point for managing client relationships and ensuring customer satisfaction and works closely with our project team. By doing so, we can provide added value to our customers and gain insights into their needs which allows us to manage and learn from their feedback.

Furthermore, we provide customer support platforms such as our hotline and live chat for customers to lodge their feedback or complaints. Upon identifying areas for improvement, we discuss potential solutions and task our internal team with addressing the underlying causes of dissatisfaction. Most of the complaints received were due to a range of issues at some of the newly handed over residential units, such as faulty faucets and malfunctioning switches. We have also enhanced our customer-centric culture and complaint handling procedures through periodic employee trainings, ensuring that the complaints are handled in a timely manner.

## Our performance

### Customer Satisfaction Survey

At Build Up, we aim to maintain a minimum average CSS score of 85% annually. We are pleased to report that our average score has increased to 89% in 202C from 86% in 202B.



Year	Property Development	Information Technology	Average
202A	83	84	84
202B	85	87	86
202C	88	90	89

### Quality Assessment System in Construction

As part of our commitment to improving our workmanship quality, we strive to exceed the average national QCLASSIC score of 72% for both our landed housing and stratified buildings. We are pleased to report that we have consistently exceeded this average score.

Year	202A	202B	202C
<b>QCLASSIC Score</b>	-	81%	83%
<b>Developments</b>	-	Mutiara Cyber Town, Cyberjaya	Queenstown, Johor Bahru

*Note: There were no completed projects in 202A.*

SRG 4.2d

SRG 5.1a

SRG 5.2a

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.3a

SRG 4.3b

## Employee Management

### Related UNSDGs:



### Why is this important?

Build Up believes that our employees are our most valuable assets and are the driving force for our success and growth. We are committed to recruiting, developing, and retaining high-performing employees while providing work environment that is both conducive and empowering. On top of that, we invest significantly in development programmes to ensure our employees remain competitive, progressive and future ready.

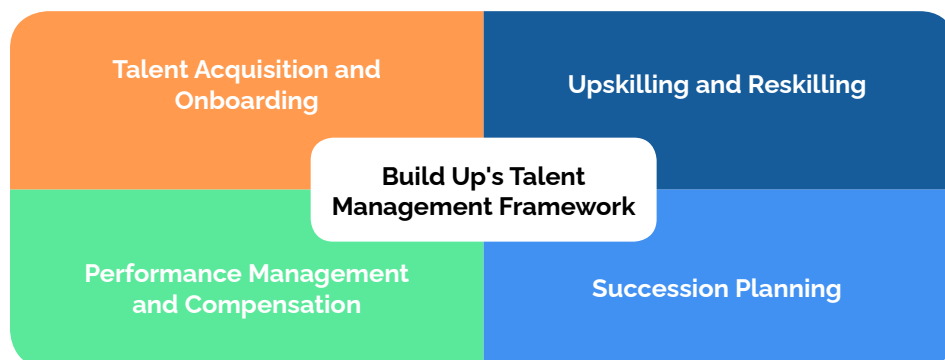
MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

Build Up adheres to local labour and employment-related laws in all our human resources practices and management. Our Group Human Resources department is guided by our 3 core values of Honesty, Integrity and Operational Excellence as well as our Talent Management Framework which focuses on the following areas:



MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

This framework, which was refreshed in 202B steers the organisation to nurture our talent, recognise their individual achievements, cultivate agile leadership, design training programmes that enhances their abilities to realise their true potential, and promote continuous performance improvement.

### ***Talent Acquisition and Onboarding***

Talent attraction and recruitment are vital to build a strong and sustainable talent pipeline for the future. At Build Up, we adhere to our Recruitment Policy and Procedures to ensure individuals are hired based on merits, i.e., skills, experience and credibility for the role while also sharing our values, culture, and vision. Effective talent attraction and recruitment, without bias and prejudice can help build a strong employer brand to attract top talent. A positive reputation can in turn increase customer loyalty and improve organisational performance. In 202C, we actively participated in various career fairs and forums to attract fresh talent and onboard them.

### ***Upskilling and reskilling***

It is our objective to foster a skilled, resilient, and agile workforce that can thrive in an ever-changing market landscape, amidst technological advances and emerging trends. We continue to adopt the 70-20-10 learning model which sees 70% of talent development occur through the on-the-job training, 20% through developmental experiences such as coaching and mentoring, and the remainder 10% through formal development activities.

To address skill gaps and help our employees achieve their career development goals, we regularly assess employees' training needs, through a training needs analysis for each employee and review our existing training initiatives for continued relevance.

In 202C, we remain committed to investing in training and development programmes, utilising both physical and online channels. Our training and development programmes include the following:

1. Corporate induction for management, executives and non-executives
2. Leadership development programmes for middle and senior management levels
3. Upskilling programmes on technical courses related to job functions
4. Webinars from subject-matter experts and industry leaders
5. Capacity building via professional certification
6. Curated in-house programmes on IT, soft skills and emotional intelligence
7. Continuous learning programmes through our on-demand e-learning platform

GRI 404-2

### ***Performance Management and Compensation***

At Build Up, we firmly hold onto our principles of being result-driven, accountable, collaborative, and shared success to drive individual and team performance. In promoting a high-performance culture, we have implemented a systematic performance review process and measurement system which includes employees' Key Performance Indicators ("KPIs"). At the beginning of each year, we ensure expectations setting conversations are initiated. We conduct a year-end performance review for all employees, providing them with the opportunity to self-assess, provide feedback, engage in competency discussions, and receive necessary coaching and support.

We recognise and celebrate achievements when one has demonstrated exceptional performance within their peer group, deliver high quality results and display outstanding behaviour, through bonuses and promotions.

We aim to create a motivating and encouraging environment by offering competitive benefits and compensation packages that attract and retain top talents. In 202C, we revised our global salary and benefits packages to ensure they reflect prevailing market rates and to remain amongst the top-choice employer.

The following are amongst the benefits provided to our employees:

#### Leave

- Annual leave, sick or hospitalisation leave, marriage leave, maternity and paternity leave, compassionate leave, sabbatical leave, child care leave, unpaid leave, hajj leave, examination leave

#### Medical

- Insurance coverage, dental care, health screening, medical coverage, postnatal expenses

#### Flexi-work arrangement

- Staggered working hours, flexi-time, work from home

#### Others

- Parking allowances, retirement benefits, employee education assistance

### ***Succession planning***

We intensify our talent management efforts by identifying individuals who are capable of taking on critical roles for succession planning. In 202C, we identified 150 high-performing employees from all levels as potential leaders and were selected to participate in our Talent Transformation Programme, which aims to equip our talent pool with the relevant leadership skills and competencies.

### ***Employee engagement initiatives***

We highly value employee feedback and thus, we conduct an annual Employee Engagement Survey to gain insights into our employee's experiences and expectations, as well as to understand their needs and concerns. In 202C, we gathered a total of 1,856 responses, representing 70% of our employees. Based on their feedback, we have identified top 3 areas of improvement which are work-life balance, rewards and recognition as well as company leadership. A focus group discussion will be organised with the relevant groups of employees to discuss ideas towards improving our current practices.

We also undertake various employee engagement initiatives to improve camaraderie and address employee concerns. Amongst employee engagements conducted in 202C are as follows:

1. Annual townhall with the GCEO
2. Employee appreciation programmes such as long service awards
3. Festive celebrations throughout the year
4. Family Day event
5. Sport Tournaments such as Futsal and Badminton game

## Our performance

### Employee training hours

In 202C, we spent 58,195 hours on training, investing RM1.35 million in internal and external learning and development programmes.

Employee Category	Total hours of training		
	202A	202B	202C
Management	3,060	3,277	3,580
Executive	23,890	25,678	25,250
Non-executive/Technical Staff	20,378	23,560	23,365
General Workers	5,940	6,788	6,000
Total	53,268	59,303	58,195

Employee Category	Average training hours per employee		
	202A	202B	202C
Management	18.3	18.3	19.4
Executive	32.1	32.6	29.0
Non-executive/Technical Staff	20.6	23.6	21.0
General Workers	12.8	14.5	12.6

	202A	202B	202C
Overall average training hours per employee (hours)	22.5	24.4	22.0

### Employee retention and attrition

Build Up is proud to have a highly engaged workforce, which is reflected in the longevity of our employees' tenure. On average, our employees stay with us for around 8.5 years.

Employee Category	Total number of new hires		
	202A	202B	202C
Management	19	21	21
Executive	57	102	94
Non-executive/Technical Staff	98	142	122
General Workers	165	265	256
Total	339	530	493

Employee Category	Total number of employee turnover		
	202A	202B	202C
Management	18	20	23
Executive	46	94	88
Non-executive/Technical Staff	105	149	136
General Workers	178	245	230
Total	347	508	477

In 202C, Build Up had a voluntary turnover rate of approximately 18.1%.

	202A	202B	202C
New hire rates (%)	14.3	21.8	18.7
Turnover rates (%)	14.7	20.9	18.1

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.3a

GRI 404-1

## Diversity, Equity & Inclusion

### Related UNSDGs:



### Why is this important?

Diversity and inclusivity at work give us a competitive edge through accumulation of, and ability to tap into a wide range of knowledge, perspectives, and ideas. In line with this, we strive to promote equal employment opportunities and non-discrimination, by actively encouraging diversity of gender, race, religion, age and nationality.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

We achieve equity through policies and actions that are underpinned by both fairness and inclusiveness. Guided by our Diversity, Equity and Inclusion Policy which was refreshed in 202B, we promote a culture that respects and values differences, advocates for equality, and encourages growth and development to help individuals reach their full potential.

We are dedicated to maintaining fair employment practices, and consistently reviewing our recruitment process to ensure equality from the beginning, in alignment with our Recruitment Policy and procedures. Additionally, we also recruit and retain employees with disabilities, ensuring their distinctive needs are met by providing support in the form of designated disabled parking spots, ramps and lift services to enhance their accessibility and inclusion within the workplace. At Build Up, employees receive competitive wages that are free from any form of gender discrimination. All decisions regarding career advancement, recognition, and rewards are approached in a fair and unbiased manner, strictly based on employees' performance and merit.

We strongly advocate for equitable gender representation on our Board, and to that end, have established a dedicated Board Diversity Policy to ensure a minimum of 30% women representation at the Board level. This is also cascaded to the management level, as Build Up strives to increase women participation in leadership roles to 30% by 202E, in comparison to 25% in 202C. In alignment with our aspiration to promote female leadership within the organisation, we have identified 88 high-performing female employees as future leaders for our 202C Talent Transformation programme.

*For further information on Talent Transformation programme, please read our Employee Management section in this Sustainability Statement (page 41 to 44).*

Several initiatives were undertaken in 202C to continue fostering mutual respect among our employees which includes celebrating cultural holidays and religious events, commemorating International Women's Day 202C, organising panel discussions featuring female leaders and curating courses on unconscious bias and development of an inclusive mindset. We received an 80% rating for Diversity, Equity and Inclusivity aspect in our recent employee engagement survey. In addition to the initiatives and policies mentioned above, our commitment to providing a safe and inclusive work environment, free from discrimination based on backgrounds, beliefs, or abilities, is further reinforced through our Human Rights Policy, Code of Conduct ("CoC"), and robust grievance mechanisms. These measures reflect our dedication to ensuring that every individual feels respected and protected from any form of harassment.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

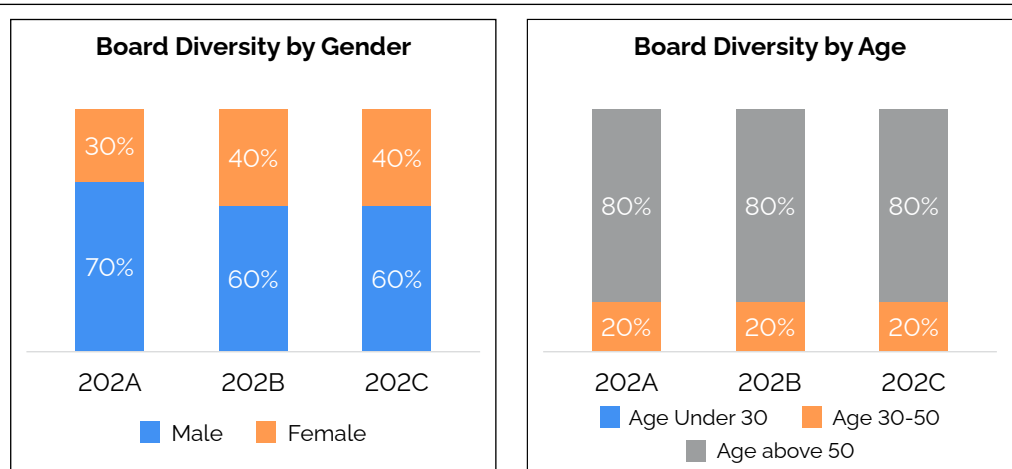
SRG 4.1c

SRG 4.2d

SRG 5.1a

SRG 5.2a

## Our performance



MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

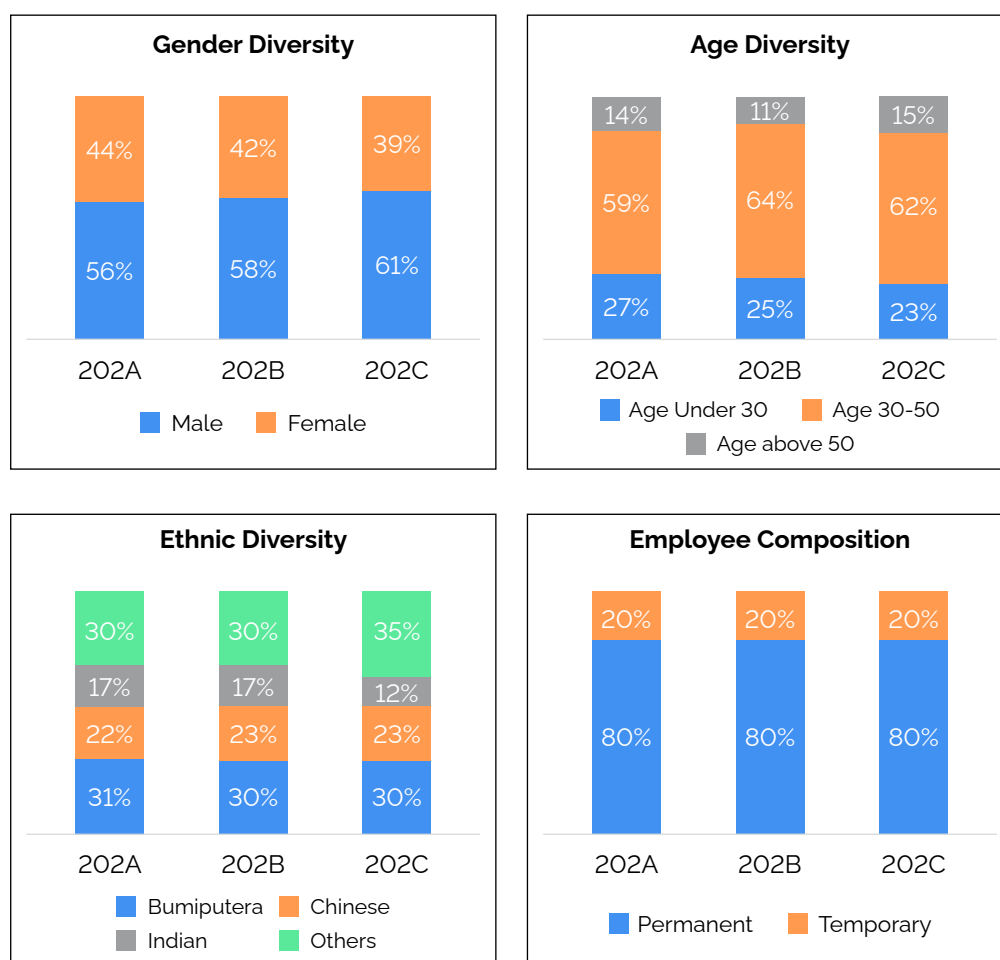
SRG 4.2a

SRG 4.3a

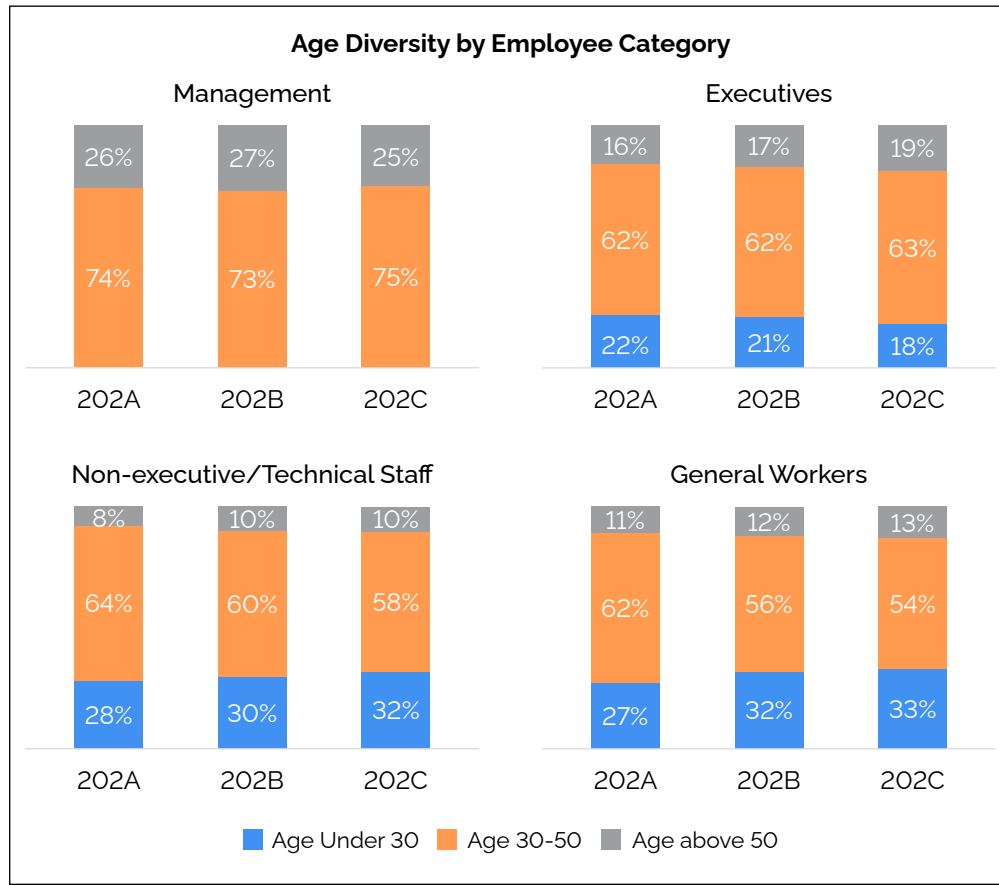
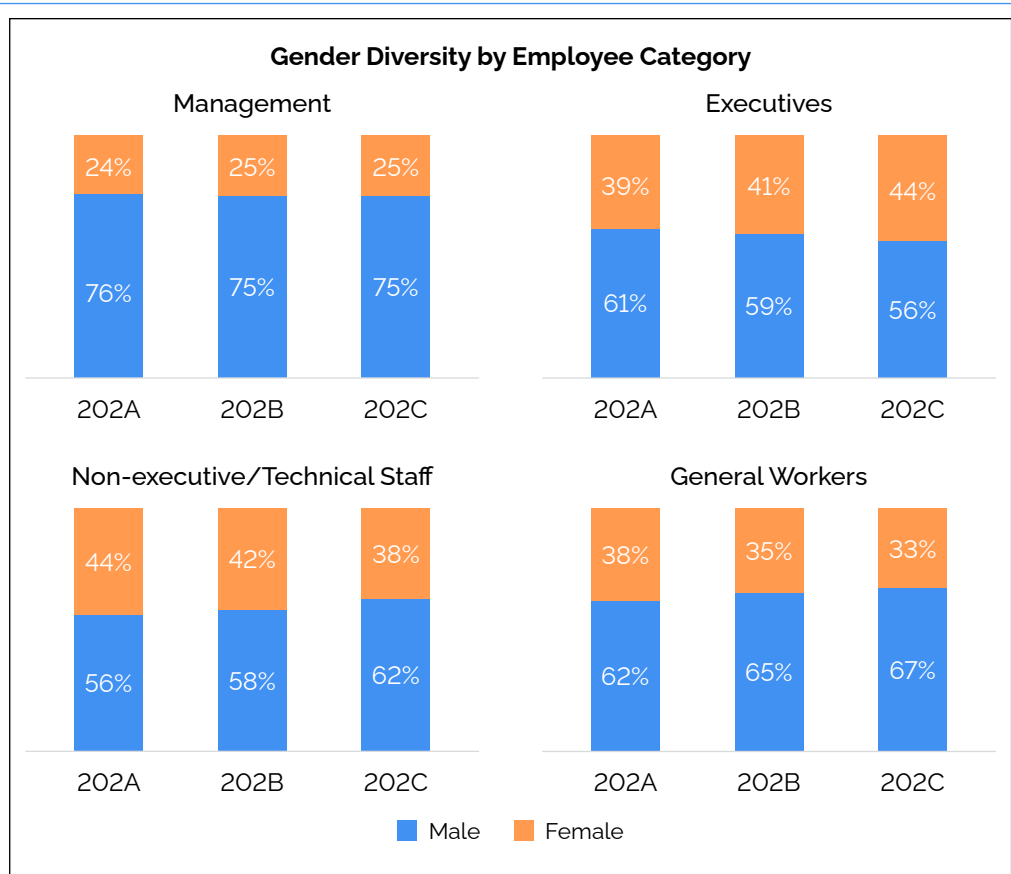
GRI 405-1

## Workforce Profile

Total employees of 2,643 in 202C







## Human Rights

### Related UNSDGs:



### Why is this important?

As a responsible organisation, Build Up is committed to protecting and respecting human rights across all our business operations. We believe that strong human rights practices coupled with fair and ethical treatment improves productivity and promotes a healthy working culture.

### Our approach

We support the United Nations Global Compact ("UNGC") Ten Principles, and the Universal Declaration of Human Rights. We also adhere to applicable laws and regulations in all our operating countries, which include but are not limited to Malaysia's Employment Act 1955 and Trade Union Act 1959; Singapore's Employment Act 1968; and Indonesia's Labour Law 2003.

Our commitment is reflected in our Human Rights Policy. This policy which was launched in 202A is consistently reviewed by the Management to ensure that our approaches to human rights always meet, or at best, go beyond regulatory requirements. In 202C, we have aligned our Human Rights Policy with the Minimum Wages Order 2022, resulting in a minimum wage of RM1,500 per month.

Our Code of Conduct ("CoC") and CoC for Third Parties also outlines our expectations to all our employees and external stakeholders in approaching human rights matters while conducting business with Build Up. This code discloses fair labour practices, zero-tolerance for child labour and any form of forced labour, protection against discrimination and harassment, freedom of association and collective bargaining, and grievance mechanisms, among others. Our CoC and Human Rights Policy are made available on our corporate website.

We have communicated to all our employees and workers about our grievance handling process and whistleblowing policy. Our whistleblowing channels offer employees a safe and confidential way to report anonymously any violation of labour practices, disputes, and inappropriate behaviour. We guarantee the protection of the whistleblower's identity throughout investigation and all reports will be taken seriously.

Given the fact that property development is a labour-intensive industry, our Property Development division is conscious of the need to devote our utmost attention to managing labour rights issues as we adhere to the International Labour Organisation's ("ILO") Indicators of Forced Labour. Our workers, including foreign workers, are provided with fair wages and compensation, decent living quarters, and adequate training to perform their jobs safely and effectively.

In 202C, the Group has embarked on conducting human rights due diligence in most of our operations in Malaysia and will subsequently expand our effort to cover all our business operations overseas. Additionally, all our employees have completed the human rights e-learning module while 10 human rights training sessions were conducted on-site involving contractors' workers.

MAIN 6.1

ACE 6.1

SRG 4.1b

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

GRI 409-1

## Our performance

In 202C, Build Up received a total of 2 grievances related to living and working conditions involving our contractor's workers, which were resolved appropriately. As part of our efforts to prevent future recurrences, the Group has improved the procedures for the management of workers' accommodation aligned with the Workers' Minimum Standards of Housing and Amenities (Amendment) Act 2019. The procedures include introducing regular inspections and engagement sessions with the workers to improve their accommodations and living conditions.

We will intensify our efforts to manage human rights in order to achieve the target of zero substantiated complaints regarding human rights violations.

	202A	202B	202C
Number of substantiated complaints concerning human rights violations	0	0	2

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.2d

SRG 4.3a

SRG 5.1a

SRG 5.2a

SRG 5.2b

## Supply Chain Management

### Related UNSDGs:



### Why is this important?

Build Up is dedicated to promoting responsible procurement practices and enhancing our supply chain resilience by incorporating sustainability elements throughout our procurement lifecycle. We firmly believe in supporting local businesses and driving economic growth in the communities where we operate. To achieve this, we prioritise sourcing from local suppliers and providing business opportunities to small and medium enterprises ("SMEs") contractors, improving their livelihoods. We ensure that our sustainability expectations pertaining to procurement practices are extended to our suppliers, which include contractors, service providers, and consultants.

MAIN 6.1

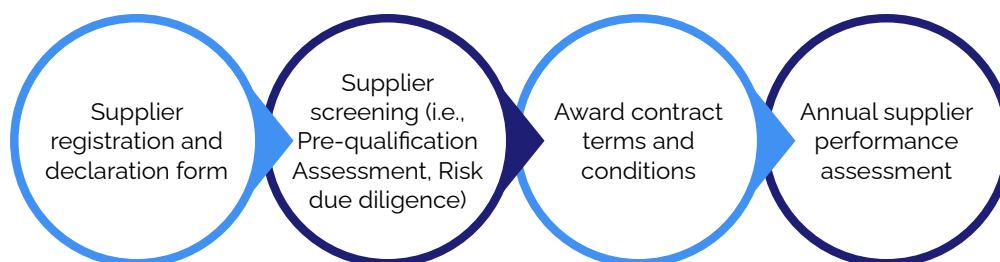
ACE 6.1

SRG 4.1b

### Our approach

All of our suppliers are required to adhere to Build Up's Responsible Sourcing Policy which encompasses our principles and guidance for sustainable procurement practices. This policy entails suppliers' adherence to Build Up's ethical business practices, including zero corruption, minimising environmental impacts and safeguarding employees' and workers' rights. This policy should be read together in conjunction with our Code of Conduct for Third Parties, Health and Safety Policy, Environmental Policy and Human Rights Policy, all of which can be accessed through our corporate website.

We are committed to ensuring that our procurement practices are fair and transparent in order to award tenders to the most credible suppliers while also collaborating with socially and environmentally conscious suppliers. We have adopted an e-procurement system that allows suppliers to efficiently undertake the following procurement processes:



Our procurement processes embed sustainability elements throughout, starting from the registration stage up to the annual supplier performance assessment. In 202C, we introduced a sustainability assessment as part of our pre-qualification process to drive sustainability awareness across our supply chain. All new and existing suppliers are expected to address our set of sustainability requirements, which focuses on suppliers' practices relating to ethical dealings, health and safety, environmental management and human rights principles. Post assessment, we categorise our suppliers based on their maturity, conduct annual performance review, develop internal risk mitigation considerations and aim to implement targeted intervention programmes to support our suppliers in embracing sustainable sourcing principles over a stipulated timeframe.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.1

ACE 6.2.2

SRG 4.1c

Furthermore, in 202C, we began assisting our suppliers, particularly the SMEs in enhancing their knowledge on sustainable supply chain practices through capacity-building programmes. At present, our capacity-building programmes focus on awareness of labor-related practices. We intend to broaden the modules to include key aspects of environmental management such as measuring and reducing carbon emissions in the future.

Cognisant of our operational needs, we prioritise procuring products and services from local suppliers to the best extent possible, as we believe that we are not only contributing positively to the local economy but also reducing our carbon footprint.

## Our performance

### Suppliers' assessment

With 202C being the first year the Group rolled out the supplier sustainability assessment, we managed to cover 72% of our new suppliers. Moving forward, the Group will ensure that all of our existing and new suppliers are assessed against our sustainability requirements.

	202A	202B	202C
Percentage of new suppliers that were screened using environmental criteria	Nil	Nil	72%
Number of suppliers assessed for environmental impacts	Nil	Nil	1,578
Percentage of new suppliers that were screened using social criteria	Nil	Nil	72%
Number of suppliers assessed for social impacts	Nil	Nil	1,578

### Local Suppliers

In 202C, out of RM124,768,341 spent on procurement, 96% was spent on local suppliers.

	202A	202B	202C
Proportion of spending on local suppliers	93%	95%	96%

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.3b

GRI 308-1

GRI 414-1

SRG 4.2a

SRG 4.3a

GRI 204-1

## Waste Management

### Related UNSDGs:



### Why is this important?

At Build Up, we prioritise proper waste management to reduce our environmental impact benefit the surrounding communities, especially in relation to our construction business. We generate different types of waste, including hazardous waste categorised as scheduled waste, as well as non-hazardous such as domestic waste, construction waste and recyclable waste. Improper waste management can have far-reaching consequences, including detrimental effects on air and water quality, soil contamination, and heightened risks of hazardous material exposure for both our employees and the surrounding communities in the areas where we operate. Recognising the severity of these potential impacts, it is imperative that we implement proactive measures to ensure responsible waste management practices across all our operations.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

Our actions are guided by the Group's Environmental Policy that outlines how to minimise waste by reducing the amount of materials used in our operations, adopting the 3R approach – reduce, reuse, and recycle, and raising employees' awareness on the significance of sustainable waste management. We target to reduce 20% of our waste sent to landfill compared to our 202A baseline by 202E.

In adhering to environmental regulations in relation to construction waste management including scheduled waste, we are guided by local regulatory laws and jurisdictional guidance. Our Malaysian entities refer to guidelines set under the Environment Quality (Scheduled Wastes) (Amendment) Regulations 2007 and the Electronic Scheduled Waste Information System by the Department of Environment. For our Indonesian and Vietnam entities, we abide by the local regulations stipulated by Indonesia's Ministry of Environment and Forestry and Vietnam Law on Environmental Protection 2020 respectively. Build Up also adopts relevant industry certification requirements, such as Green Building Index ("GBI") and Leadership in Energy and Environmental Design ("LEED").

We ensure that our construction waste is separated into concrete, wood, and steel at the respective project sites for ease of reuse and disposal. Our scheduled waste is managed on site through periodic monitoring and data recording. Additionally, we make sure that all of our scheduled waste is properly stored and managed from its collection point to its final disposal by appointed licensed contractors.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

For our Information Technology division, most of the waste produced are general waste at our office buildings. We have established initiatives to increase awareness among our employees in efforts to reduce waste such as:

<p><b>Segregation of non-recyclable and recyclable waste</b></p> 	<p><b>E-waste recycling campaign</b></p> 	<p><b>Advocating the use of paperless documents by going digital</b></p> 
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We promote waste reduction and recycling among employees by encouraging them to reuse items such as paper, plastics, and aluminum, and providing bins for the segregation of different types of waste. Recyclable waste is processed at recycling centers, while non-recyclable waste is sent to landfills. Moving forward, Build Up aims to reduce the amount of waste sent to landfills by exploring circular economy principles and implementing innovating solutions for waste management.

### Our performance

In 202C, Build Up generated a total of 2,636.5 MT of hazardous and non-hazardous waste, of which 14.4% was reused or recycled. While hazardous waste is categorised as scheduled waste, non-hazardous waste includes domestic waste, construction waste and recyclable waste.

Upon conducting our annual review of our waste management practices and progress against target, it has come to our attention that the Group's initial target cannot be achieved based on the current progress made. The challenges encountered in waste reduction can be attributed to the lack of standardisation and coordination among contractors and suppliers. Therefore, we have made the decision to revise our goal and now aim to achieve a 20% reduction in the amount of waste sent to landfills by 202E, which represents a decrease from our initial target of 30% set previously.

In order to ensure the achievement of this revised target, we will intensify our efforts by fostering collaboration among stakeholders and enhancing the efficiency of raw materials and resources utilised in our daily operations. By actively engaging and involving all relevant parties, we seek to address the existing gaps in coordination and implement innovative solutions, where possible, to drive sustainable waste management practices across the Group.

SRG 4.2d

SRG 5.1a

SRG 5.2a

SRG 5.2b

SRG 5.2c

	202A		202B		202C	
	Property Development	Information Technology	Property Development	Information Technology	Property Development	Information Technology
Total waste generated (MT)	2,787.2	3.5	2,711.8	2.9	2,634.1	2.4

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.2d

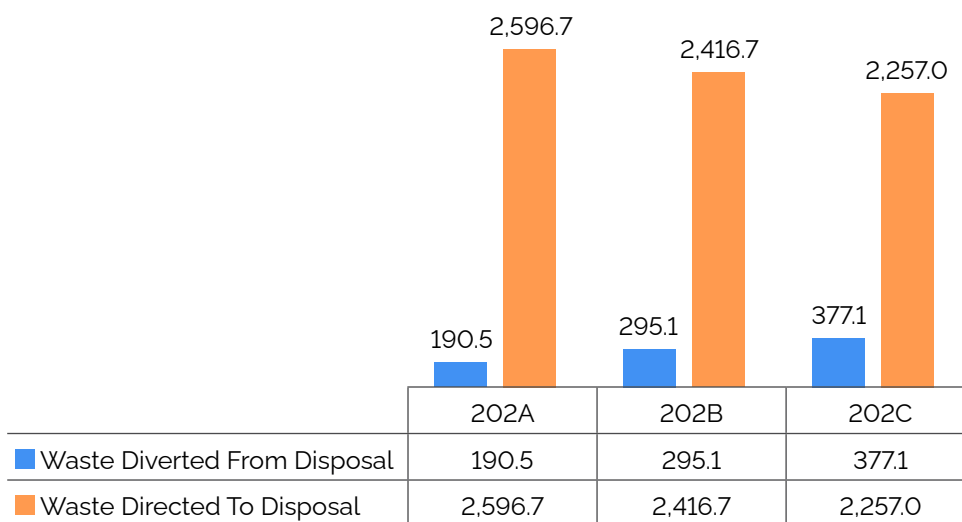
SRG 4.3a

GRI 306-3

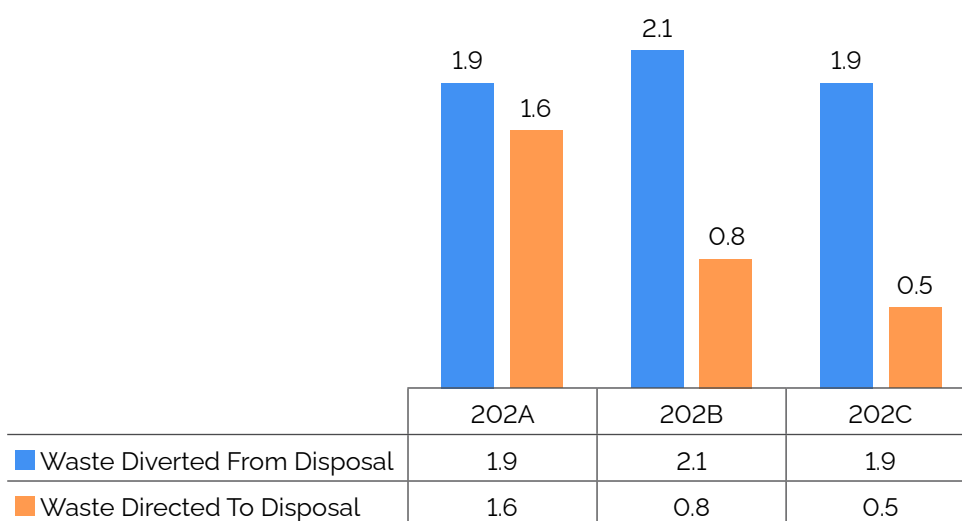
GRI 306-4

GRI 306-5

**Waste Generated by Property Development (MT)**



**Waste Generated by Information Technology (MT)**





## Community Investment

### Related UNSDGs:



### Why is this important?

We firmly believe that fostering a positive relationship between businesses and communities promotes better social inclusion, and creates tangible and favourable outcomes in the long run. At Build Up, we strive to be a responsible corporate citizen by giving back to the surrounding communities in which we operate, through our community engagement and impact programmes, with a focus on education and social welfare. By investing in education, we aim to nurture local talent to provide them with opportunities to reach their full potential. We are confident that by empowering and supporting exceptional individuals within the communities, we will contribute to forming a high-quality talent pool that will not only benefit Build Up in the near term but also serve as future leaders of organisations. Additionally, we are convinced that our contributions towards the betterment of local communities through welfare-related initiatives will strengthen our relationship with them.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

Build Up's commitment to supporting local communities is reflected in our Community Investment Guideline, which outlines Build Up's principles and practices in managing our community-related investment decisions. This guideline describes our objective to align our community programmes towards generating mutually beneficial outcomes for both the Group and the community.

This year, we have streamlined our education and welfare-related initiatives with a focus on 2 flagship programmes, namely the Brighter Future Scholarship and Better Shelter for the Needy.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c



#### Brighter Future Scholarship

- Provide financial assistance to high-achieving students from underprivileged backgrounds
- This scholarship programme covers tuition fees, boarding and living expenses of recipients pursuing tertiary education at selected local universities
- In 202C, Build Up has supported a total of 51 students during the year, with a total expenditure of RM1.28 million



#### Better Shelter for the Needy

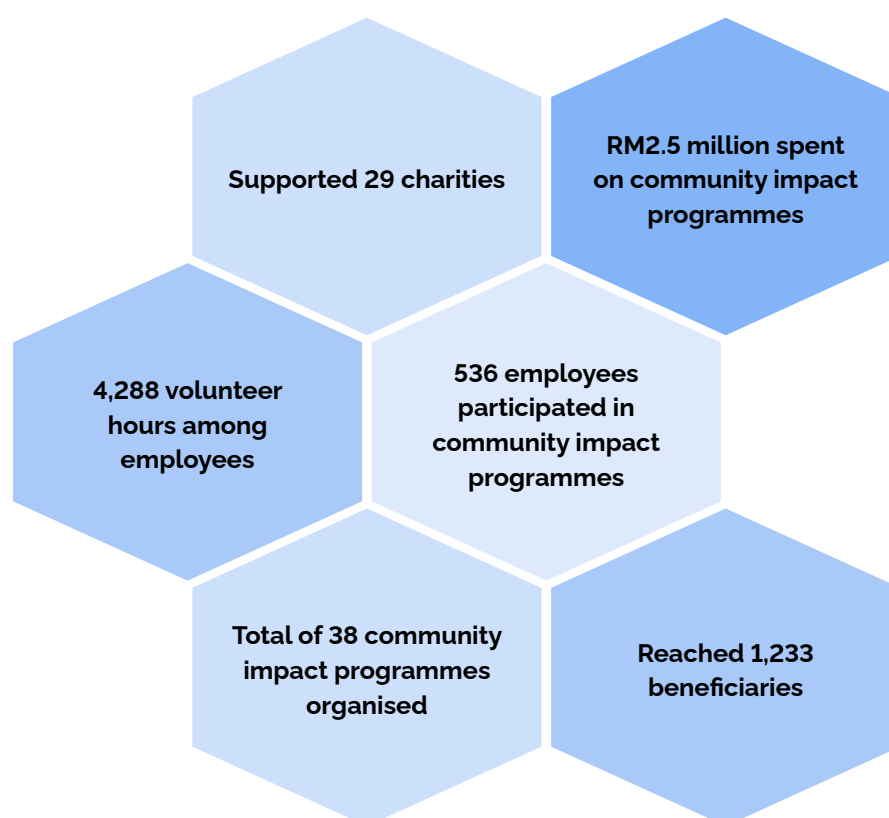
- Collaborate with local constituencies to reconstruct homes that were destroyed by natural disasters
- In 202C, we helped rebuild 12 homes for local communities affected by flooding events in Johor and Kelantan with a total contribution amounting to approximately RM900,000
- Since the establishment of this programme in 2012, we have provided support to a total of 195 families

Build Up has also contributed RM320,000 worth of monetary and non-monetary donations to 29 charities, non-profit organizations ("NGO"), and educational institutions across the regions we operate in. Non-monetary donations include but are not limited to food packs, basic necessities and groceries.

We believe that the spirit of volunteerism among employees is vital in contributing to the success of Build Up's community impact programmes. In 202C, we started monitoring and tracking employees' participation in community impact programmes and provide them with e-certificates as a token of appreciation. Furthermore, as a form of encouragement, we actively support employee participation in these activities by allowing them to take approved leave of absence, separate from their annual leaves.

## Our performance

Key highlights of Build Up's contributions for year 202C are as follows:



## Community Investment Performance Data

	202A	202B	202C
Total amount invested where the target beneficiaries are external to Build Up	RM1,901,678	RM2,236,079	RM2,499,562
Total number of beneficiaries of the investment in communities	1,010	1,189	1,233
Number of employees participated in community impact programmes	Nil	Nil	536
Total hours spent on community impact programmes	Nil	Nil	4,288

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.2a

SRG 4.3a

SRG 4.3b

GRI 201-1

## Water Management

### Related UNSDGs:



### Why is this important?

The issue of water scarcity is becoming increasingly alarming due to several factors, such as climate change, poor water management, and contamination. As water cuts and scarcity are becoming more frequent, the Group is committed to mitigating the risk of water shortages through efficient water management across our operations.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

As a Group, we are guided by our Environmental Policy and adopt a practical approach to water management, aiming to improve water efficiency and promote water conservation. This aligns with our target of reducing water consumption by 15% from our 202A baseline by 2025.

Our Water Management Guidelines ensure that we adhere to all the requirements stipulated by the relevant regulations and permits pertaining to water quality. Additionally, it guides us in our water-related practices throughout the value chain, from design to development stages, especially in accordance with local laws and regulations. We also adopt a number of best practices that are recommended by recognised international standards in this area.

Our water consumption primarily stems from construction activities such as concrete mixing, dust suppression, equipment and machinery cooling, site cleaning, compaction, irrigation as well as from our site office, worker facilities, owned office buildings and properties. We are committed to implementing water conservation initiatives and raising employees' awareness on proper water management at all our premises. These initiatives include:

Implement rainwater harvesting systems for our Malaysian construction sites to reduce water dependency on municipal water

Reduce water wastage through regular checking and scheduled maintenance of toilets, pantries, etc.

Install modified water taps with lower flow rates at our offices and data centers

Raise awareness among employees through campaigns and reminders on water saving habits at our office premises

We will annually review our water management plans across all our operations to continually increase efficiency and ensure we are able to achieve our water consumption reduction targets.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

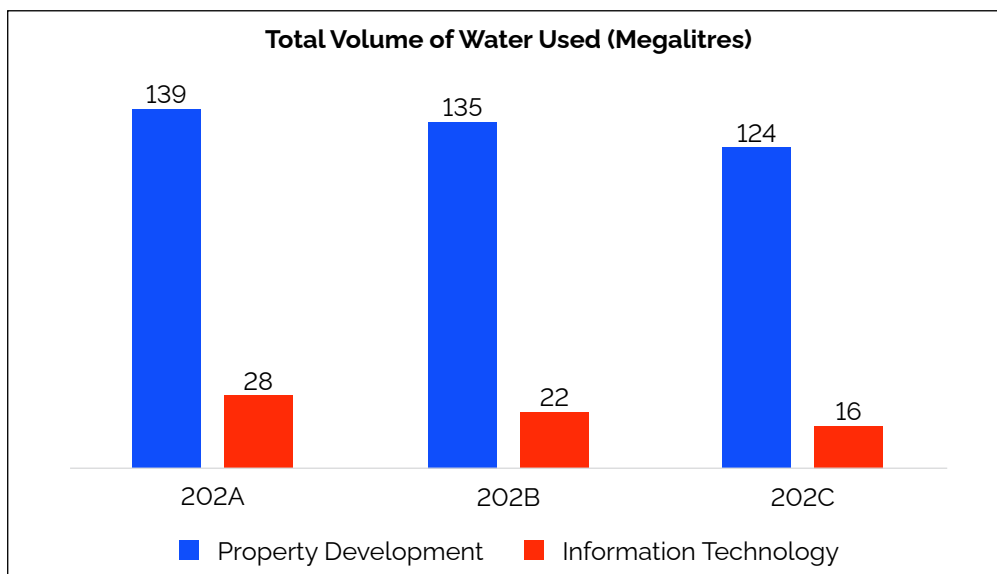
SRG 4.1c

SASB IF-RE-140a.4

## Our performance

In 202C, the Group consumed 140 megalitres of water, representing a significant reduction of 16.7% against the 202A baseline. This surpasses our targeted reduction of 15%.

In view of our current performance, the Group, upon deliberation, has revised its target upwards to achieve a 20% reduction in water consumption by 2025. Moving forward, as part of our measures, Build Up aims to implement rainwater harvesting systems for our construction sites in both Indonesia and Vietnam.



SRG 4.2a

SRG 4.2d

SRG 4.3a

SRG 5.1a

SRG 5.2a

GRI 305-5

SASB TC-SI-130a.2

## Materials

### Related UNSDGs:



### Why is this important?

Build Up recognises that natural resources are finite, and hence, we place great importance on resource conservation by attempting to maximise the use of environmental-friendly materials, including those with high recycled content and are green-certified. By incorporating recycled input materials such as crushed concrete and recycled steel, we can reduce the demand and reliance on virgin materials such as cement, concrete and steel, and minimise the environmental footprint throughout our products' life cycle.

MAIN 6.1

ACE 6.1

SRG 4.1b

### Our approach

In managing our materials, Build Up is guided by our Responsible Sourcing Policy which includes a commitment to minimising environmental impact.

We have undertaken initiatives to reduce our consumption of virgin materials by using recycled materials wherever possible. For example, we use system formwork and prefabricated components in building high-rise structures. The formwork can be reused several times and is made of recyclable materials. Among other primary eco-friendly materials used are low volatile organic compounds ("VOC") emulsions paint, recycled steel and aluminum, reinforced concrete and plaster ceiling, eco-friendly building block and roof thermal insulation foam, and green labelled tiles and ceiling.

MAIN 6.2.1

MAIN 6.2.2

ACE 6.2.2

ACE 6.2.1

SRG 4.1c

### Our performance

We have been monitoring and reporting the main three construction materials for our development projects as follows:

Materials	Total Weight (tonnes)		
	202A	202B	202C
Concrete	77,404	75,645	80,022
Steel	9,376	10,013	12,809
Tiles	135,056	115,788	120,478

MAIN 6.2.3

MAIN 11.1

ACE 6.2.3

ACE 11.1

SRG 4.3a

GRI 301-1

In 202C, we started monitoring the percentage of recycled materials used in our ongoing developments.

	202A	202B	202C
Percentage of recycled materials used	-	-	15%

SRG 4.3b

GRI 301-2

Moving forward, we aim to progressively increase the percentage of recycled materials used as we move towards our journey of embracing circular economy.

## Commentaries

### Bursa Malaysia's Listing Requirements

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

(c) material sustainability matters and –

#### MAIN 6.1

- (ii) why they are important to the listed issuer; and
- (iii) how they are managed including details on –

#### MAIN 6.2.1

(aa) policies to manage these sustainability matters;

#### MAIN 6.2.2

(bb) measures or actions taken to deal with these sustainability matters; and

#### MAIN 6.2.3

(cc) indicators relevant to these sustainability matters which demonstrate how the listed issuer has performed in managing these sustainability matters together with the data for the last 3 financial years, and performance target(s) in relation to the indicators (if such targets are set);

#### MAIN 10.1

**Paragraph 6.3, Practice Note 9, Main LR:** For purposes of paragraph 6.2(c) above, sustainability matters are considered material if they:

- (a) reflect the listed issuer's significant economic, environmental and social impacts; or
- (b) substantively influence the assessments and decisions of stakeholders; and
- (c) fall under the common material sustainability matters as set out in Annexure PN9-A.

#### MAIN 11.1

**Paragraph 6.5, Practice Note 9, Main LR:** For purposes of paragraph 6.2(c)(iii)(cc) above, a listed issuer must disclose the data for a reported indicator in the following manner:

No.	Reporting of new indicator	Minimum data disclosures
(a)	In the first year of reporting a new indicator ("said indicator")	Data for the financial year
(b)	In the second year of reporting the said indicator	Data for the financial year and for the immediate preceding financial year
(c)	From the third year onwards of reporting the said indicator	Data for the financial year and for the 2 immediate preceding financial years

**Paragraph 6.2, Guidance Note 11, ACE LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

(c) material sustainability matters and –

**ACE 6.1**

- (ii) why they are important to the listed issuer; and
- (iii) how they are managed including details on –

**ACE 6.2.1**

- (aa) policies to manage these sustainability matters;

**ACE 6.2.2**

- (bb) measures or actions taken to deal with these sustainability matters; and

**ACE 6.2.3**

- (cc) indicators relevant to these sustainability matters which demonstrate how the listed issuer has performed in managing these sustainability matters together with the data for the last 3 financial years, and performance target(s) in relation to the indicators (if such targets are set);

**ACE 9.1**

**Paragraph 6.3, Guidance Note 11, ACE LR:** For purposes of paragraph 6.2(c) above, sustainability matters are considered material if they:

- (a) reflect the listed issuer's significant economic, environmental and social impacts; or
- (b) substantively influence the assessments and decisions of stakeholders; and
- (c) fall under the common material sustainability matters as set out in Annexure GN11-A.

**ACE 11.1**

**Paragraph 6.6, Practice Note 11, ACE LR:** For purposes of paragraph 6.2(c)(iii)(cc) above, a listed corporation must disclose the data for a reported indicator in the following manner:

No.	Reporting of new indicator	Minimum data disclosures
(a)	In the first year of reporting a new indicator ("said indicator")	Data for the financial year
(b)	In the second year of reporting the said indicator	Data for the financial year and for the immediate preceding financial year
(c)	From the third year onwards of reporting the said indicator	Data for the financial year and for the 2 immediate preceding financial years

## Bursa Malaysia's Sustainability Reporting Guide (3<sup>rd</sup> Edition)

### Chapter 6: Management Approach, Disclosure Guidance 1: How material sustainability matters are managed

#### SRG 4.1a

Question (a): Does the company report on

- (i) all common material sustainability matters as set out in Annexure PN9-A (for Main Market listed issuer) or Annexure GN11-A (for ACE Market listed corporations), and
- (ii) other material sustainability matters that are identified and prioritised via the materiality assessment that it has undertaken?

#### SRG 4.1b

Question (b): For each reported sustainability matter, does the company provide an explanation of why such a matter is material/important?

#### SRG 4.1c

Question (c): For each reported sustainability matter, does the company provide clear and comprehensive disclosures of the management approach taken?

### Chapter 6: Management Approach, Disclosure Guidance 2: Reporting on relevant indicators

#### SRG 4.2a

Question (a): Has the company reported, at a minimum, all the Common Indicators identified by the Exchange in its Sustainability Statement?

#### SRG 4.2d

Question (d): Did the company disclose performance targets set in relation to reported indicators (where applicable)?

### Chapter 6: Management Approach, Disclosure Guidance 3: For each reported indicator, provision of data for the last 3 financial years

#### SRG 4.3a

Question (a): Does the company provide 3 financial years' worth of data for each reported indicator?

#### SRG 4.3b

Question (b): Do all newly adopted sustainability indicators conform to the minimum data requirements set?

### Chapter 8: Performance Targets, Disclosure Guidance 1: Performance targets for reported indicators

#### SRG 5.1a

Question (a): What are the performance targets set for the company's reported indicators?

### Chapter 8: Performance Targets, Disclosure Guidance 2: Reporting of progress against performance targets

#### SRG 5.2a

Question (a): What is the company's performance or progress against set targets?

#### SRG 5.2b

Question (b): In the event of setbacks, what are the actions taken by the company to get back on track?

#### SRG 5.2c

Question (c): If any of the performance targets set are revised, has the company provided the following:

- (a) Revised targets
- (b) Reasons/basis for the revisions



## GRI Standards

### GRI 3: Material Topics 2021

#### GRI 3-3

**Disclosure 3-3:** Management of material topics

### GRI 201: Economic Performance 2016

#### GRI 201-1

**Disclosure 201-1:** Direct economic value generated and distributed

### GRI 204: Procurement Practices 2016

#### GRI 204-1

**Disclosure 204-1:** Proportion of spending on local suppliers

### GRI 205: Anti-Corruption 2016

#### GRI 205-1

**Disclosure 205-1:** Operations assessed for risks related to corruption

#### GRI 205-2

**Disclosure 205-2:** Communication and training about anti-corruption policies and procedures

#### GRI 205-3

**Disclosure 205-3:** Confirmed incidents of corruption and actions taken

### GRI 301: Materials 2016

#### GRI 301-1

**Disclosure 301-1:** Materials used by weight or volume

#### GRI 301-2

**Disclosure 301-2:** Recycled input materials used

### GRI 302: Energy 2016

#### GRI 302-1

**Disclosure 302-1:** Energy consumption within the organization

#### GRI 302-4

**Disclosure 302-4:** Reduction of energy consumption

### **GRI 303: Water and Effluents 2018**

#### **GRI 303-5**

**Disclosure 303-5:** Water consumption

### **GRI 305: Emissions 2016**

#### **GRI 305-1**

**Disclosure 305-1:** Direct (Scope 1) GHG emissions

#### **GRI 305-2**

**Disclosure 305-2:** Energy indirect (Scope 2) GHG emissions

#### **GRI 305-3**

**Disclosure 305-3:** Other indirect (Scope 3) GHG emissions

#### **GRI 305-5**

**Disclosure 305-5:** Reduction of GHG emissions

### **GRI 306: Waste 2020**

#### **GRI 306-3**

**Disclosure 306-3:** Waste generated

#### **GRI 306-4**

**Disclosure 306-4:** Waste diverted from disposal

#### **GRI 306-5**

**Disclosure 306-5:** Waste directed to disposal

### **GRI 308: Supplier Environmental Assessment 2016**

#### **GRI 308-1**

**Disclosure 308-1:** New suppliers that were screened using environmental criteria

### **GRI 403: Occupational Health and Safety 2018**

#### **GRI 403-1**

**Disclosure 403-1:** Occupational health and safety management system

#### **GRI 403-4**

**Disclosure 403-4:** Worker participation, consultation, and communication on occupational health and safety

#### **GRI 403-5**

**Disclosure 403-5:** Worker training on occupational health and safety

#### **GRI 403-9**

**Disclosure 403-9:** Work-related injuries

**GRI 404: Training and Education 2016****GRI 404-1**

**Disclosure 404-1:** Average hours of training per year per employee

**GRI 404-2**

**Disclosure 404-2:** Programs for upgrading employee skills and transition assistance programs

**GRI 405: Diversity and Equal Opportunity 2016****GRI 405-1**

**Disclosure 405-1:** Diversity of governance bodies and employees

**GRI 409: Forced or Compulsory Labor 2016****GRI 409-1**

**Disclosure 409-1:** Operations and suppliers at significant risk for incidents of forced or compulsory labor

**GRI 414: Supplier Social Assessment 2016****GRI 414-1**

**Disclosure 414-1:** New suppliers that were screened using social criteria

**GRI 418: Customer Privacy 2016****GRI 418-1**

**Disclosure 418-1:** Substantiated complaints concerning breaches of customer privacy and loss of customer data

**SASB Standards: Real Estate****Energy Management****SASB IF-RE-130a.5**

**IF-RE-130a.5:** Description of how building energy management considerations are integrated into property investment analysis and operational strategy

**Water Management****SASB IF-RE-140a.4**

**IF-RE-140a.4:** Description of water management risks and discussion of strategies and practices to mitigate those risks

**Climate Change Adaptation****SASB IF-RE-450a.2**

**IF-RE-450a.2:** Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and strategies for mitigating risks

## SASB Standards: Software and IT Services

### Environmental Footprint of Hardware Infrastructure

#### SASB TC-SI-130a.1

**TC-SI-130a.1:** (1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable

#### SASB TC-SI-130a.2

**TC-SI-130a.2:** (1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress

### Data Privacy & Freedom of Expression

#### SASB TC-SI-220a.1

**TC-SI-220a.1:** Description of policies and practices relating to behavioral advertising and user privacy

### Data Security

#### SASB TC-SI-230a.1

**TC-SI-230a.1:** (1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected

#### SASB TC-SI-230a.2

**TC-SI-230a.2:** Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards

# Task Force on Climate - Related Financial Disclosures ("TCFD") - aligned Disclosures

Build Up is committed to playing a role in contributing towards the transition to a low carbon economy, and in cognisant of heightened interest from our stakeholders. We have initiated the process of integrating the TCFD Recommendations within our sustainability statement this year, ahead of the regulatory requirements of Bursa Malaysia's Main Market Listing Requirements. In positioning Build Up for long-term success and climate resilience in a rapidly changing business environment, we strive to manage the climate-related risks and capture opportunities which may impact our business, strategy, and financial planning.

MAIN 7.1

ACE 10.3

## Governance

The Board of Directors has ultimate oversight of Build Up's initiatives to identify, assess and integrate climate-related risks and opportunities, as well as the progress against goals and targets related to them throughout the organisation. Supporting the Board of Directors is the Board Risk Management and Sustainability Committee ("BRMSC") which is primarily responsible for our climate change efforts, including ensuring the integration of climate-related risks and opportunities within the organisation's enterprise risk management. Quarterly Board meetings held include discussions on climate-related issues and other sustainability matters.

TCFD 1a

The Sustainability Steering Committee ("SSC"), chaired by the Chief Sustainability Officer, shares the responsibility of managing our climate-related risks and opportunities by identifying, assessing, and ultimately integrating them into our business. The SSC is also responsible for formulating Build Up's sustainability strategy to transition the organisation towards a low carbon economy, specifically the Climate Transition Strategy, with support from the Sustainability Working Group ("SWG").

TCFD 1b

*Note: For further information on our governance and Climate Transition Strategy, please refer to Sustainability Governance section (page 12 to 13) and Management Approach to Material Matters: Climate Change section (page 35 to 38).*

## Strategy

Build Up has conducted several focus group discussions with our internal stakeholders across our operations to identify the localised climate risks relevant to the Group. In addition to that, we have conducted our inaugural qualitative scenario analysis using the Representative Concentration Pathway ("RCP") adopted by the Intergovernmental Panel on Climate Change ("IPCC") and Network of Central Banks and Supervisors for Greening the Financial System ("NGFS") scenarios.

Note:

1. The RCP describes 4 different pathways of concentration which include a stringent scenario (RCP2.6), two intermediate scenarios (RCP4.5 and RCP6.0) and one scenario with very high GHG emissions (RCP8.5). (Source: [The Synthesis Report of IPCC Fifth Assessment Report \(AR5\)](#))
2. The NGFS has developed 6 scenarios to assess transition and physical risks which are: Net Zero 2050, Below 2 °C, Divergent Net Zero, Delayed Transition, Nationally Determined Contributions, and Current Policies (Source: [NGFS Portal](#))

The Group's climate-related risks and opportunities were modelled based on the following scenarios:

Scenario	Description	Assessed for
IPCC RCP 8.5/4°C	The 'business-as-usual' scenario represents a high-emissions future with significant increases in global average temperature, as no concerted efforts are made to reduce emissions	Physical risks
NGFS Net Zero 2050	An ambitious pathway towards achieving net zero emissions by 2050, through stringent climate policies and innovations	Transition risks and opportunities

Based on the scenarios above, we have identified the potential impact of the risks and opportunities to the business. Through our financial planning, we will allocate a substantial amount of RM150 million in capital expenditure to cover investments in renewable energy ("RE"), transitioning to low-carbon practices, and research and development of innovative technologies. This allocation of funds aligns with our formulated adaptation and mitigation plans to address the identified risks and seize the opportunities in an effective manner.

Scenario	Type	Risks and Opportunities	Potential Impacts
IPCC RCP 8.5/4°C	Physical risk – acute risk	● Increased extreme weather events such as floods	a. Floods can damage buildings, disrupt supply chains, and impact the health and safety of employees (e.g., the construction progress for 3 of our ongoing developments in Kuala Lumpur and Ho Chi Minh City have significantly been impacted) b. Additional resources are needed to be deployed to ensure the completion of the developments above are within the stipulated timeframe
NGFS Net Zero	Transition risk - Regulatory	● Introduction of carbon pricing mechanisms	a. Increase the cost of Build Up's business operations
	Transition risk - Reputation	● Increased concerns or negative feedback from stakeholders	a. Damages Build Up's reputation if stakeholders perceive that the Group is ignoring climate-related risks or failing to take appropriate actions b. Loss of trust and confidence in the company c. Investors choosing to pull investments out of Build Up in favour of other more sustainable companies
	Opportunity – Products and services	● Transition to lower emissions solution	a. Better competitive position in line with shifting consumer preferences b. Increased revenue through demand for lower emissions technologies
	Opportunity - Resilience	● Participation in and adoption of RE	a. Establish partnerships with established RE companies for our upcoming developments towards designing for net zero carbon buildings
	Opportunity - Markets	● Access to new markets	a. Tap into the potential market for sustainable IT systems which is fully powered by RE
<b>Legend:</b> ● Short to medium term risks/opportunities (current to 2030) ● Medium to long term risks/opportunities (2030- 2050)			

### Resilience of the organisation's strategy

TCFD 2c

The resilience of an organisation's strategy depends on its ability to adapt and thrive in the face of changing circumstances and emerging risks. One key factor in achieving this is aligning the organisation's strategy with climate-related scenarios. At Build Up, we have conducted qualitative scenario analysis to identify potential risks and opportunities, which informs our business and climate strategies. This includes leveraging our expertise to create low-carbon building solutions, and innovating products and services that can address climate-related challenges.

Moving forward, we plan to conduct quantitative scenario analysis and aspire to align with the Science Based Targets initiative ("SBTi"). Our goal is to develop a resilient strategy that can effectively tackle the risks and capitalise on opportunities associated with climate change.

*Note: For further information on our Climate Transition Strategy, please refer to Management Approach to Material Matters: Climate Change section (page 35 to 38).*

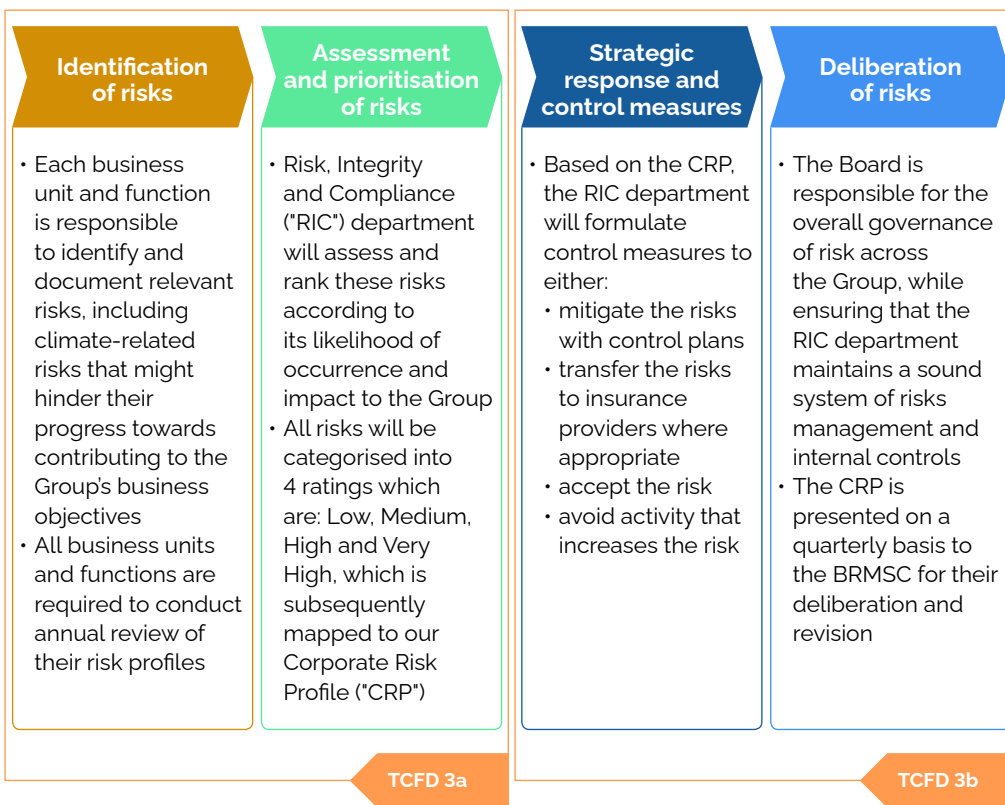
### Risk Management

All our identified risks, including climate-related risks are strategically assessed and managed through our risk management process, which is integrated into our Enterprise Risk Management ("ERM") framework. This framework is in accordance with the ISO 31000:2018 Risk Management Guideline.

TCFD 3c

IFRS S1 2.2

The risks are identified, assessed, and managed through the following process:



IFRS S1 2.1

*Note: For further information on our risk management, please refer to our Statement on Risk Management and Internal Control ("SORMIC") in the Annual Report FY202C and Our Approach to Sustainability: Sustainability Governance section (page 12 to 13).*



## Metrics and Targets

At Build Up, we track our climate-related performance using the following metrics:

- Scope 1, Scope 2, and limited Scope 3 (i.e., business travel and employee commuting) emission (tCO<sub>2</sub>-e)
- Energy consumption (GJ)
- Waste generated (MT)
- Water used (m<sup>3</sup>)

TCFD 4a

IFRS S1 3.1

All our carbon emission data follow the methodologies in accordance with the GHG Protocol Corporate Accounting and Reporting Standard. Our total emissions for the year amounted to 6,452 tCO<sub>2</sub>-e for Scope 1 and 3,895 tCO<sub>2</sub>-e for Scope 2, representing a 3.5% reduction in total GHG emissions from the previous year.

TCFD 4b

As a commitment towards achieving carbon neutrality by 2030, with an aspiration of Net Zero by 2050, Build Up has set climate-related targets related to GHG emissions, energy consumption, water consumption, and waste generation as follows:

- Reduce absolute GHG emissions for Scope 1 and Scope 2 by 40% from the 202C baseline by 2030
- Reduce energy consumption by 10% from the 202A baseline by 2025
- Reduce waste sent to landfill by 20% from 202A baseline by 202E
- Reduce water consumption by 20% from the 202A baseline by 2025

TCFD 4c

IFRS S1 3.2

IFRS S1 3.3

IFRS S1 3.4

*Note: For further information on our metrics and targets, please refer to our Performance Scorecard (page 22), Management Approach to Material Matters: Climate section (page 35 to 38), Waste Management section (page 52 to 54) and Water Management section (page 57 to 58).*

For further information on ACE Market Basic Transition Plan, please refer to Climate-related Financial Disclosure Requirements for ACE Listed Corporations: Transition Plan towards a Low Carbon Economy section (page 97 to 98).

## Commentaries

### Bursa Malaysia's Listing Requirements

#### MAIN 7.1

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

- (d) the climate-related disclosures which are aligned with the Recommendations of the Task Force on Climate-Related Financial Disclosures ("TCFD Recommendations"), covering all four pillars: governance, strategy, risk management, and metrics and targets, in a dedicated section within the Sustainability Statement;

#### ACE 10.3

**Paragraph 6.5, Guidance Note 11, ACE LR:** A listed corporation is not required to comply with paragraph 6.4 above if the listed corporation's Sustainability Statement includes climate-related disclosures which are aligned with the Recommendations of the Task Force on Climate-Related Financial Disclosures ("TCFD Recommendations"), covering all four pillars: governance, strategy, risk management, and metrics and targets, in a dedicated section within the Sustainability Statement.

### TCFD Recommendations

#### TCFD 1a

**Governance, Recommended Disclosure (a):** Describe the board's oversight of climate-related risks and opportunities.

#### TCFD 1b

**Governance, Recommended Disclosure (b):** Describe management's role in assessing and managing climate-related risks and opportunities.

#### TCFD 2a

**Strategy, Recommended Disclosure (a):** Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.

#### TCFD 2b

**Strategy, Recommended Disclosure (b):** Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.

#### TCFD 2c

**Strategy, Recommended Disclosure (c):** Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

#### TCFD 3a

**Risk Management, Recommended Disclosure (a):** Describe the organization's processes for identifying and assessing climate-related risks.

#### TCFD 3b

**Risk Management, Recommended Disclosure (b):** Describe the organization's processes for managing climate-related risks.

#### TCFD 3c

**Risk Management, Recommended Disclosure (c):** Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

## TCFD 4a

**Metrics and Targets, Recommended Disclosure (a):** Disclose the metrics used by the organization assess climate related risks and opportunities line with its strategy and risk management process.

## TCFD 4b

**Metrics and Targets, Recommended Disclosure (b):** Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.

## TCFD 4c

**Metrics and Targets, Recommended Disclosure (c):** Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

## SASB Standards: Real Estate

### Climate Change Adaptation

## SASB IF-RE-450a.2

**IF-RE-450a.2:** Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and strategies for mitigating risks

## IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information

## IFRS S1 2.1

**Paragraph 27,** To achieve this objective, an entity shall disclose information about:

- (b) management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities, including information about:
  - (i) whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee; and

## IFRS S1 2.2

- (ii) whether management uses controls and procedures to support the oversight of sustainability-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions.

## IFRS S1 3.1

**Paragraph 51,** An entity shall disclose information about the targets it has set to monitor progress towards achieving its strategic goals, and any targets it is required to meet by law or regulation. For each target, the entity shall disclose:

- (a) the metric used to set the target and to monitor progress towards reaching the target;

## IFRS S1 3.2

- (b) the specific quantitative or qualitative target the entity has set or is required to meet;

## IFRS S1 3.3

- (c) the period over which the target applies;

## IFRS S1 3.4

- (d) the base period from which progress is measured;

# Performance Data Table

MAIN 9.1

MAIN 11.1

ACE 8.1

ACE 11.1

SRG 6.1a

SRG 6.1b

SRG 6.1c

Indicator	Unit	202A	202B	202C	Target
<b>Economic Performance</b>					
<i>Economic value generated (i.e., revenue and other income)</i>	MYR	1,987,123,754	2,134,445,678	2,407,882,223	
<i>Economic value distributed (i.e., operating costs, employee wages and benefits, payments to providers of capital, payments to government, and community investments)</i>	MYR	1,664,142,692	1,882,590,605	2,071,629,660	
<i>Economic value retained</i>	MYR	322,981,062	251,855,073	336,252,563	
<b>Anti-corruption</b>					
Bursa C1(a) Percentage of employees who have received training on anti- corruption by employee category					
Management	Number	100	100	100	
Executive	Number	100	100	100	
Non-executive/Technical Staff	Number	94	100	100	
Bursa C1(b) Percentage of operations assessed for corruption-related risks	Percentage	100	100	100	
Bursa C1(c) Confirmed incidents of corruption and action taken	Number	0	0	0	
<b>Health &amp; Safety</b>					
Bursa C5(a) Number of work-related fatalities	Number	1	0	1	Zero fatality annually
Bursa C5(b) Lost Time Incident Rate ("LTIR")	Rate	0.12	0.06	0	
Bursa C5(c) Number of employees trained on health and safety standards	Number	645	728	832	
<i>Total hours worked</i>	Hours	3,453,892	3,324,112	4,538,400	
<i>Number of lost time injuries</i>	Number	2	1	0	
<b>Cybersecurity &amp; Data Protection</b>					
Bursa C8(a) Number of substantiated complaints concerning breaches of customer privacy or losses of customer	Number	0	0	0	
<b>Climate Change</b>					
Bursa C4(a) Total energy consumption	Gigajoules	36,230	35,169	33,567	Reduce energy consumption by 10% from the 202A baseline by 2025

Internal assurance

External assurance

No assurance

(\*) Restated

Note: *Italicised fonts represent indicators other than those under the common material matters*

Indicator	Unit	202A	202B	202C	Target
Bursa C11(a) Scope 1 emissions in tonnes of CO <sub>2</sub> e	tCO <sub>2</sub> -e	6,652*	6,608*	6,452	Reduce absolute GHG emissions for Scope 1 and Scope 2 by 40% from the 202A baseline by 2030
Bursa C11(b) Scope 2 emissions in tonnes of CO <sub>2</sub> e	tCO <sub>2</sub> -e	4,321	4,112	3,895	
Bursa C11 (c) Scope 3 emissions in tonnes of CO <sub>2</sub> e (i.e., business travel and employee commuting)	tCO <sub>2</sub> -e	-	-	547	
<b>Customer Satisfaction</b>					
<i>Customer satisfaction index</i>	Percentage	84	86	89	Achieve a minimum of 85% for Customer Satisfaction Survey ("CSS") score annually
<i>QLASSIC score</i>	Percentage	-	81	83	
<b>Employee Management</b>					
Bursa C6(a) Total hours of training by employee category					
Management	Hours	3,060	3,277	3,580	
Executive	Hours	23,890	25,678	25,250	
Non-executive/Technical Staff	Hours	20,378	23,560	23,365	
General Workers	Hours	5,940	6,788	6,000	
Bursa C6(c) Total number of employee turnover by employee category					
Management	Number	18	20	23	
Executive	Number	46	94	88	
Non-executive/Technical Staff	Number	105	149	136	
General Workers	Number	178	245	230	
<i>Average training hours per employee</i>	Hours	22.5	24.4	22.0	
<i>Total new hires</i>	Number	339	530	493	
<i>New hire rate</i>	Percentage	14.3	21.8	18.7	
<i>Turnover rate</i>	Percentage	14.7	20.9	18.1	
<b>Diversity, Equity &amp; Inclusion</b>					
Bursa C3(a) Percentage of employees by gender and age group by employee category					Increase participation of women in leadership roles at the management level to 30% by 202E

Internal assurance

External assurance

No assurance

(\*) Restated

Note: *Italicised fonts represent indicators other than those under the common material matters*

Indicator	Unit	202A	202B	202C	Target
Gender group by employee category					
Management - Male	Percentage	76	75	75	
Management - Female	Percentage	24	25	25	
Executive - Male	Percentage	61	59	56	
Executive - Female	Percentage	39	41	44	
Non-executive/Technical Staff - Male	Percentage	56	58	62	
Non-executive/Technical Staff - Female	Percentage	44	42	38	
General Workers - Male	Percentage	62	65	67	
General Workers - Female	Percentage	38	35	33	
Age group by employee category					
Management - Under 30	Percentage	0	0	0	
Management - Between 30-50	Percentage	74	73	75	
Management - Above 50	Percentage	26	27	25	
Executive - Under 30	Percentage	22	21	18	
Executive Between 30-50	Percentage	62	62	63	
Executive Above 50	Percentage	16	17	19	
Non-executive/Technical Staff - Under 30	Percentage	28	30	32	
Non-executive/Technical Staff - Between 30-50	Percentage	64	60	58	
Non-executive/Technical Staff - Above 50	Percentage	8	10	10	
General Workers - Under 30	Percentage	27	32	33	
General Workers - Between 30-50	Percentage	62	56	54	
General Workers - Above 50	Percentage	11	12	13	
Bursa C3(b) Percentage of directors by gender and age group					
Male	Percentage	70	60	60	
Female	Percentage	30	40	40	
Under 30	Percentage	0	0	0	
Between 30-50	Percentage	20	20	20	
Above 50	Percentage	80	80	80	
Bursa C6(b) Percentage of employees that are contractors or temporary staff	Percentage	20	20	20	
<i>Gender diversity - Male</i>	Percentage	56	58	61	
<i>Gender diversity - Female</i>	Percentage	44	42	39	
<i>Age diversity - Under 30</i>	Percentage	27	25	23	
<i>Age diversity - Between 30-50</i>	Percentage	59	64	62	
<i>Age diversity - Above 50</i>	Percentage	14	11	15	
<i>Ethnic diversity - Bumiputera</i>	Percentage	31	30	30	
<i>Ethnic diversity - Chinese</i>	Percentage	22	23	23	
<i>Ethnic diversity - Indian</i>	Percentage	17	17	12	
<i>Ethnic diversity - Others</i>	Percentage	30	30	35	

Internal assurance	External assurance	No assurance	(*) Restated
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Note: Italicised fonts represent indicators other than those under the common material matters

Indicator	Unit	202A	202B	202C	Target
<b>Human Rights</b>					
Bursa C6(d) Number of substantiated complaints concerning human rights violations	Number	0	0	2	Zero substantiated complaints concerning human rights violations annually
<b>Supply Chain Management</b>					
Bursa C7(a) Proportion of spending on local suppliers	Percentage	93	95	96	
<i>New suppliers that were screened using environmental criteria</i>	Percentage	-	-	72	
<i>Suppliers assessed for environmental impacts</i>	Number	-	-	1,578	
<i>New suppliers that were screened using social criteria</i>	Percentage	-	-	72	
<i>Suppliers assessed for social impacts</i>	Number	-	-	1,578	
<b>Waste Management</b>					
Bursa C10(a) Total waste generated	Metric tonnes	2,790.7	2,714.7	2,636.5	Reduce waste sent to landfill by 20% from 202A baseline by 202E
Bursa C10(a)(i) Total waste diverted from disposal	Metric tonnes	192.4	297.2	379.0	
Bursa C10(a)(ii) Total waste directed to disposal	Metric tonnes	2,598.3	2,417.5	2,257.5	
<b>Community Investment</b>					
Bursa C2(a) Total amount invested in the community where the target beneficiaries are external to the listed issuer	MYR	1,901,678	2,236,079	2,499,562	
Bursa C2(b) Total number of beneficiaries of the investment in communities	Number	1,010	1,189	1,233	
<i>Employees participated in community impact programmes</i>	Number	-	-	536	
<i>Total hours spent on community impact programmes</i>	Hours	-	-	4,288	
<b>Water Management</b>					
Bursa C9(a) Total volume of water used	Megalitres	167	157	140	Reduce water consumption by 20% from the 202A baseline by 2025
<b>Materials</b>					
<i>Total weight or volume of materials that used to produce and package products and services</i>	Tonnes	221,836	115,645	213,309	
<i>Recycled materials used in ongoing developments</i>	Percentage	-	-	15	

Internal assurance

External assurance

No assurance

(\*) Restated

For detailed information on the breakdown statistics for each indicator, please refer to the respective material matters section.

Note: Italicised fonts represent indicators other than those under the common material matters

## Commentaries

### Bursa Malaysia's Listing Requirements

#### MAIN 9.1

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

- (f) a summary of the data and performance targets disclosed in the Sustainability Statement, in a prescribed format.

#### MAIN 11.1

**Paragraph 6.5, Practice Note 9, Main LR:** For purposes of paragraph 6.2(c)(iii)(cc) above, a listed issuer must disclose the data for a reported indicator in the following manner:

No.	Reporting of new indicator	Minimum data disclosures
(a)	In the first year of reporting a new indicator ("said indicator")	Data for the financial year
(b)	In the second year of reporting the said indicator	Data for the financial year and for the immediate preceding financial year
(c)	From the third year onwards of reporting the said indicator	Data for the financial year and for the 2 immediate preceding financial years

#### ACE 8.1

**Paragraph 6.2, Guidance Note 11, ACE LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

- (e) a summary of the data and performance targets disclosed in the Sustainability Statement, in a prescribed format.

#### ACE 11.1

**Paragraph 6.6, Guidance Note 11, ACE LR:** For purposes of paragraph 6.2(c)(iii)(cc) above, a listed issuer must disclose the data for a reported indicator in the following manner:

No.	Reporting of new indicator	Minimum data disclosures
(a)	In the first year of reporting a new indicator ("said indicator")	Data for the financial year
(b)	In the second year of reporting the said indicator	Data for the financial year and for the immediate preceding financial year
(c)	From the third year onwards of reporting the said indicator	Data for the financial year and for the 2 immediate preceding financial years



**Bursa Malaysia's Sustainability Reporting Guide (3<sup>rd</sup> Edition)****Chapter 9: Performance Data Table, Disclosure Guidance 1: Content of Performance Data Table****SRG 6.1a**

Question (a): Does the performance data table include all sustainability indicators reported throughout the company's Sustainability Statement?

**SRG 6.1b**

Question (b): Does the company provide 3 financial years' worth of data for each reported indicator?

**SRG 6.1c**

Question (c): For those indicators with accompanying performance target(s), are such targets reflected in the performance data table?

# Assurance Statement

In strengthening the credibility of our reporting, selected parts of this Sustainability Statement has been subjected to the following:

- an internal review by the company's internal auditors; and
- independent assurance in accordance with recognised assurance standards for selected indicators and has been approved by the Company's Audit Committee.

The Scope, Subject Matter(s) covered, and Conclusion (where applicable) are provided below:

Type of Assurance	Material Matters	Subject Matter	Scope	Conclusion
Independent Assurance	Health & Safety	Number of work-related fatalities	Operations assessed: 1. Malaysia 2. Indonesia 3. Singapore	Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Subject Matter as presented in Build Up Berhad's Sustainability Statement have not been prepared and presented fairly, in all material respects, in accordance with the defined Criteria*.
		Lost time incident rate		
		Number of employees trained on health and safety standards		
	Climate Change	Total energy consumption		
		Scope 1 emissions in tonnes of CO <sub>2</sub> e		
		Scope 2 emissions in tonnes of CO <sub>2</sub> e		
Internal Review	Economic Performance	Direct economic value generated and distributed	Operations assessed: 1. Malaysia 2. Indonesia 3. Singapore	Not applicable.
	Anti-corruption	Percentage of employees who have received training on anti-corruption by employee category		
		Percentage of operations assessed for corruption-related risk		
		Confirmed incidents of corruption and action taken		
	Cybersecurity and Data Protection	Number of substantiated complaints concerning breaches of customer privacy and losses of customer data		
	Customer Satisfaction	Customer Satisfaction Survey score		
	Employee Management	Total hours of training by employee category		
		Total number of employee turnover by employee category		
	Climate Change	Scope 3 emissions in tonnes of CO <sub>2</sub> e (i.e., business travel and employee commuting)		

Please refer to page 88 to 91 for the Independent Limited Assurance Statement provided by Ernst & Young Consulting Sdn Bhd.

We will continue to improve on our data accuracy and quality to strengthen our disclosures moving forward by ensuring that all indicators will be subjected to independent assurance in the next 5 years.

MAIN 8.1

ACE 7.1

SRG 7.1a

GRI 2-5

\*Note: In preparing the Subject Matter mentioned above, Build Up applied the following criteria:

- The Global Reporting Initiative ("GRI") Standards
- Build Up's relevant policies and procedures

## Commentaries

### Bursa Malaysia's Listing Requirements

#### MAIN 8.1

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

- (e) a statement on whether the listed issuer has subjected the Sustainability Statement to –
  - (i) internal review by its internal auditor; or
  - (ii) independent assurance performed in accordance with recognised assurance standards, to strengthen the credibility of the Sustainability Statement, and if so, the subject matter(s) and scope covered. In addition, for independent assurance, the conclusions must also be disclosed;

#### ACE 7.1

**Paragraph 6.2, Guidance Note 11, ACE LR:** In making the Sustainability Statement, a listed corporation must include disclosures on the following:

- (d) a statement on whether the listed corporation has subjected the Sustainability Statement to –
  - (i) internal review by its internal auditor; or
  - (ii) independent assurance performed in accordance with recognised assurance standards, to strengthen the credibility of the Sustainability Statement, and if so, the subject matter(s) and scope covered. In addition, for independent assurance, the conclusions must also be disclosed;

### Bursa Malaysia's Sustainability Reporting Guide (3<sup>rd</sup> Edition)

#### Chapter 10: Statement of Assurance, Disclosure Guidance 1: Content of Statement of Assurance

##### SRG 7.1a

Question (a): To what extent has the sustainability statement been subjected to an assurance process?

### GRI Standards

#### GRI 2: General Disclosures 2021

##### GRI 2-5

**Disclosure 2-5:** External assurance

# GRI Content Index

GRI Standard	Disclosure		Page number
General disclosures			
GRI 2: General Disclosures 2021	2-1	Organisational details	Annual Report 202C
	2-2	Entities included in the organization's sustainability reporting	10
	2-3	Reporting period, frequency and contact point	10
	2-4	Restatements of information	10
	2-5	External assurance	80, 88-91
	2-6	Activities, value chain and other business relationships	4-9
	2-7	Employees	7, 46
	2-8	Workers who are not employees	46
	2-9	Governance structure and composition	Annual Report 202C
	2-10	Nomination and selection of the highest governance body	Annual Report 202C
	2-11	Chair of the highest governance body	Annual Report 202C
	2-12	Role of the highest governance body in overseeing the management of impacts	Annual Report 202C, 12-13
	2-13	Delegation of responsibility for managing impacts	Annual Report 202C, 12-13
	2-14	Role of the highest governance body in sustainability reporting	12-13
	2-15	Conflicts of interest	Annual Report 202C
	2-16	Communication of critical concerns	Annual Report 202C
	2-17	Collective knowledge of the highest governance body	Annual Report 202C, 12-13
	2-18	Evaluation of the performance of the highest governance body	Annual Report 202C
	2-19	Remuneration policies	Annual Report 202C
	2-20	Process to determine remuneration	Annual Report 202C, 12-13
	2-21	Annual total compensation ratio	Annual Report 202C
	2-22	Statement on sustainable development strategy	21, 35-38
	2-23	Policy commitments	28-59
	2-24	Embedding policy commitments	28-59
	2-25	Processes to remediate negative impacts	28-59
	2-26	Mechanisms for seeking advice and raising concerns	29, 48
	2-27	Compliance with laws and regulations	28-59
	2-28	Membership associations	Annual Report 202C
	2-29	Approach to stakeholder engagement	14-16
	2-30	Collective bargaining agreements	48

GRI Standard	Disclosure		Page number
Material topics			
GRI 3: Material Topics 2021	3-1	Process to determine material topics	17-18, 92-93
	3-2	List of material topics	17-18, 92-93
Economic Performance			
GRI 3: Material Topics 2021	3-3	Management of material topics	28
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	28, 74
Anti-corruption			
GRI 3: Material Topics 2021	3-3	Management of material topics	29-30
GRI 205: Anti-Corruption 2016	205-1	Operations assessed for risks related to corruption	29-30, 74
	205-2	Communication and training about anti-corruption policies and procedures	29-30, 74
	205-3	Confirmed incidents of corruption and actions taken	29-30, 74
Health & Safety			
GRI 3: Material Topics 2021	3-3	Management of material topics	31-32
GRI 403: Occupational Health and Safety 2018	403-1	Occupational health and safety management system	31-32
	403-4	Worker participation, consultation, and communication on occupational health and safety	31-32
	403-5	Worker training on occupational health and safety	31-32, 74
	403-9	Work-related injuries	31-32, 74
Cybersecurity & Data Protection			
GRI 3: Material Topics 2021	3-3	Management of material topics	33-34
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	33-34, 74
Climate Change			
GRI 3: Material Topics 2021	3-3	Management of material topics	35-38
GRI 302: Energy 2016	302-1	Energy consumption within the organization	35-38, 74
	302-4	Reduction of energy consumption	35-38
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	35-38, 75
	305-2	Energy indirect (Scope 2) GHG emissions	35-38, 75
	305-3	Other indirect (Scope 3) GHG emissions	35-38, 75
	305-5	Reduction of GHG emissions	35-38
Employee Management			
GRI 3: Material Topics 2021	3-3	Management of material topics	41-44
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	41-44, 75
	404-2	Programs for upgrading employee skills and transition assistance programs	41-44

GRI Standard	Disclosure		Page number
Diversity, Equity & Inclusion			
GRI 3: Material Topics 2021	3-3	Management of material topics	45-47
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	45-47, 75-76
Human Rights			
GRI 3: Material Topics 2021	3-3	Management of material topics	48-49
GRI 409: Forced or Compulsory Labor 2016	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	48-49
Supply Chain Management			
GRI 3: Material Topics 2021	3-3	Management of material topics	50-51
GRI 204: Procurement Practices 2016	204-1	Proportion of spending on local suppliers	50-51, 77
GRI 308: Supplier Environmental Assessment 2016	308-1	New suppliers that were screened using environmental criteria	50-51, 77
GRI 414: Supplier Social Assessment 2016	414-1	New suppliers that were screened using social criteria	50-51, 77
Waste Management			
GRI 3: Material Topics 2021	3-3	Management of material topics	52-54
GRI 306: Waste 2020	306-3	Waste generated	52-54, 77
	306-4	Waste diverted from disposal	52-54, 77
	306-5	Waste directed to disposal	52-54, 77
Community Investment			
GRI 3: Material Topics 2021	3-3	Management of material topics	55-56
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	28
Water Management			
GRI 3: Material Topics 2021	3-3	Management of material topics	57-58
GRI 303: Water and Effluents 2018	303-5	Water consumption	57-58, 77
Materials			
GRI 3: Material Topics 2021	3-3	Management of material topics	59
GRI 301: Materials 2016	301-1	Materials used by weight or volume	59, 77
	301-2	Recycled input materials used	59, 77

# SASB Content Index

## Real Estate

Topic	Code	Description	202C Performance
<b>Energy Management</b>	IF-RE-130a.1	Energy consumption data coverage as a percentage of total floor area, by property subsector	To be included in subsequent Sustainability Statements
	IF-RE-130a.2	(1) Total energy consumed by portfolio area with data coverage, (2) percentage grid electricity, and (3) percentage renewable, by property subsector	To be included in subsequent Sustainability Statements
	IF-RE-130a.3	Like-for-like percentage change in energy consumption for the portfolio area with data coverage, by property subsector	To be included in subsequent Sustainability Statements
	IF-RE-130a.4	Percentage of eligible portfolio that (1) has an energy rating and (2) is certified to ENERGY STAR, by property subsector	Not applicable
	IF-RE-130a.5	Description of how building energy management considerations are integrated into property investment analysis and operational strategy	Please refer to Climate Change section page 35 to 38
<b>Water Management</b>	IF-RE-140a.1	Water withdrawal data coverage as a percentage of (1) total floor area and (2) floor area in regions with High or Extremely High Baseline Water Stress, by property subsector	To be included in subsequent Sustainability Statements
	IF-RE-140a.2	(1) Total water withdrawn by portfolio area with data coverage and (2) percentage in regions with High or Extremely High Baseline Water Stress, by property subsector	To be included in subsequent Sustainability Statements
	IF-RE-140a.3	Like-for-like percentage change in water withdrawn for portfolio area with data coverage, by property subsector	To be included in subsequent Sustainability Statements
	IF-RE-140a.4	Description of water management risks and discussion of strategies and practices to mitigate those risks	Please refer to Water Management section page 57 to 58
<b>Management of Tenant Sustainability Impacts</b>	IF-RE-410a.1	(1) Percentage of new leases that contain a cost recovery clause for resource efficiency related capital improvements and (2) associated leased floor area, by property subsector	Not applicable
	IF-RE-410a.2	Percentage of tenants that are separately metered or submetered for (1) grid electricity consumption and (2) water withdrawals, by property subsector	Not applicable
	IF-RE-410a.3	Discussion of approach to measuring, incentivizing, and improving sustainability impacts of tenants	Not applicable
<b>Climate Change Adaptation</b>	IF-RE-450a.1	Area of properties located in 100-year flood zones, by property subsector	Build Up is currently evaluating the technical specifications required to report on this indicator
	IF-RE-450a.2	Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and strategies for mitigating risks	Please refer to TCFD-aligned Disclosures page 67 to 71

Topic	Code	Description	202C Performance
Activity Metric	IF-RE-000.A	Number of assets, by property subsector	Please refer to our Annual Report
	IF-RE-000.B	Leasable floor area, by property subsector	Please refer to our Annual Report
	IF-RE-000.C	Percentage of indirectly managed assets, by property subsector	Zero
	IF-RE-000.D	Average occupancy rate, by property subsector	We do not publicly report this information as the data is commercially sensitive and confidential

### Software and IT Services

Topic	Code	Description	202C Performance
Environmental Footprint of Hardware Infrastructure	TC-SI-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	(1) Please refer to Climate Change section page 35 to 38 (2) To be included in subsequent Sustainability Statements (3) Please refer to Climate Change section page 35 to 38
	TC-SI-130a.2	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Please refer to Water Management page 57 to 58
	TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data center needs	To be included in subsequent Sustainability Statements
Data Privacy & Freedom of Expression	TC-SI-220a.1	Description of policies and practices relating to behavioral advertising and user privacy	Please refer to Cybersecurity section page 33 to 34
	TC-SI-220a.2	Number of users whose information is used for secondary purposes	We do not publicly report this information as the data is commercially sensitive and confidential
	TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Zero
	TC-SI-220a.4	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	To be included in subsequent Sustainability Statements
	TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	None
Data Security	TC-SI-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	(1) Please refer to Cybersecurity section page 33 to 34 (2) Zero (3) Zero
	TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Please refer to Cybersecurity section page 33 to 34



Topic	Code	Description	202C Performance
<b>Recruiting &amp; Managing a Global, Diverse &amp; Skilled Workforce</b>	TC-SI-330a.1	Percentage of employees that are (1) foreign nationals and (2) located offshore	To be included in subsequent Sustainability Statements
	TC-SI-330a.2	Employee engagement as a percentage	To be included in subsequent Sustainability Statements
	TC-SI-330a.3	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	To be included in subsequent Sustainability Statements
<b>Intellectual Property Protection &amp; Competitive Behavior</b>	TC-SI-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Zero
<b>Managing Systemic Risks from Technology Disruptions</b>	TC-SI-550a.1	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	We do not publicly report this information as the data is commercially sensitive and confidential
	TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	Please refer to our Annual Report
<b>Activity Metric</b>	TC-SI-000.A	(1) Number of licenses or subscriptions, (2) percentage cloudbased	Please refer to our Annual Report
	TC-SI-000.B	(1) Data processing capacity, (2) percentage outsourced	Please refer to our Annual Report
	TC-SI-000.C	(1) Amount of data storage, (2) percentage outsourced	Please refer to our Annual Report

# Additional Information

## Independent Limited Assurance Statement

### Independent Limited Assurance Statement to the Directors of Build Up Berhad

#### Our Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Subject Matter as presented in Build Up's Sustainability Statement 202C have not been prepared and presented fairly, in all material respects, in accordance with the Criteria defined below.

#### Scope of Work

Ernst & Young Consulting Sdn. Bhd. ("EY" or "we") was engaged by Build Up Berhad ("Build Up") to perform a 'limited assurance engagement,' as defined by the International Standard on Assurance Engagements ("ISAE") 3000 Revised, Assurance Engagement other than Audits or Review of Historical Financial Information, on selected subject matters ("Subject Matter") included in Build Up's 202C Sustainability Statement ("SS202C") for the financial year ended 31 December 202C.

#### Subject Matter

Our limited assurance engagement was performed for the Subject Matter listed in the table below, as presented in the SS202C:

MAIN 8.1

ACE 7.1

SRG 7.1a

GRI 2-5

Material Matters	GRI Standards disclosures	Subject Matter	Scope
Health and Safety	GRI 403-9	Number of work-related fatalities	Operations assessed: 1. Malaysia 2. Indonesia 3. Singapore
	GRI 403-9	Lost time incident rate	
	GRI 403-5	Number of employees trained on health and safety standards	
Climate Change	GRI 302-1	Total energy consumption	Operations assessed: 1. Malaysia 2. Indonesia 3. Singapore
	GRI 305-1	Scope 1 emissions in tonnes of CO2e	
	GRI 305-2	Scope 2 emissions in tonnes of CO2e	

The scope of our work was limited to the Subject Matter presented in the SS202C and did not include coverage of data sets or information unrelated to the data and information underlying the Subject Matter and related disclosures; nor did it include information reported outside of the SS202C, comparisons against historical data, or management's forward-looking statements.

#### Criteria applied by Build Up

In preparing the Subject Matter mentioned above, Build Up applied the following criteria:

- The Global Reporting Initiative ("GRI") Standards
- Build Up's relevant policies and procedures

***Build Up's responsibilities***

Build Up's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records, and making estimates that are relevant to the preparation of the Subject Matter, such that it is free from material misstatement, whether due to fraud or error.

***EY's responsibilities***

Our responsibility is to express our conclusion on whether anything has come to our attention that causes us to believe that the Subject Matter and related disclosures as presented in the SS202C are not prepared, in all material respects, in accordance with the Criteria.

We have performed our limited assurance engagement in accordance with the terms of reference for this engagement agreed with Build Up, including performing the engagement in accordance with the ISAE 3000, issued by the International Auditing and Assurance Standards Board. This Standard requires that we plan and perform our engagement to obtain limited assurance about whether the Subject Matter and related disclosures as presented in the SS202C are free from material misstatement.

A limited assurance engagement undertaken in accordance with ISAE 3000 involves assessing the suitability in the circumstances of Build Up's use of the criteria specified as the basis of preparation used for the selected Subject Matter and related disclosures presented in the SS202C, assessing the risks of material misstatement thereof, whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the Subject Matter and related disclosures in the SS202C. We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

***Our Independence and Quality Control***

We have maintained our independence and confirm that we have met the requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies the Malaysian Approved Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements. Accordingly, the firm is required to design, implement and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirement.

***Description of procedures performed***

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and applying analytical and other appropriate procedures.

Our procedures included:

- Gaining an understanding of Build Up's business, internal processes and approach to sustainability
- Conducting interviews with key personnel and collating evidence to understand Build Up's process for reporting performance indicators and disclosures, including inquiring regarding risks of misstatement and quality controls to address risks
- Conducting limited assurance procedures over the selected Subject Matter and disclosures, including:
  - o Undertaking analytical procedures to support the reasonableness of the data
  - o Checking that the calculation Criteria have been applied as per the methodologies for the Subject Matter within the Statement
  - o Identifying and testing assumptions supporting calculations
  - o Testing, on a sample basis, underlying source information to check accuracy of the data
  - o Performing recalculations of performance indicators using input data
  - o Checking that measurements made at the end of the reporting period are timely entered in the records and the sustainability statement
  - o Obtaining appropriate representations from management, in the form of a management representation letter addressed to us to confirm that the management believes that it has fulfilled its responsibilities

We also performed such other procedures as we considered necessary in the circumstances.

### ***Inherent Limitations***

Inherent limitations of assurance engagements include use of judgement and selective testing of data, which means that it is possible that fraud, error or non-compliance may occur and not be detected in the course of performing the engagement. Accordingly, there is some risk that a material misstatement may remain undetected. Further, our limited assurance engagement is not designed to detect fraud or error that is immaterial.

There are additional inherent risks associated with assurance engagements performed for non-financial information given the characteristics of the subject matter and associated with the compilation of source data using definitions and methods for determining, calculating, and estimating such information that are developed internally by management. The absence of a significant body of established practice on which to draw, allows for the selection of different but acceptable measurement techniques which can result in materially different measurements and can impact comparability. The precision of different measurement techniques may also vary. Qualitative interpretations of relevance, materiality and the accuracy of data are subject to individual assumptions and judgements. In particular, where the information relies on factors derived by independent third parties, our assurance work has not included examination of the derivation of those factors and other third-party information.

**Other Matters**

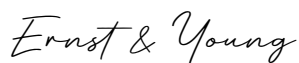
Information relating to prior reporting periods has not been subject to assurance procedures. Our report does not extend to any disclosures or assertions relating to future performance plans and/or strategies disclosed in the SS202C. The maintenance and integrity of Build Up's website is the responsibility of Build Up's management. Our procedures did not involve consideration of these matters and, accordingly we accept no responsibility for any changes to the Subject Matter and related disclosures, the SS202C or to our independent limited assurance report that may have occurred since the initial date of presentation on the Build Up's website.

**Restriction of use**

Our work has been undertaken to enable us to express a limited assurance conclusion on the matters stated above in our report provided to the directors of Build Up in accordance with the terms of our engagement, and for no other purpose.

Our report is intended solely for the directors of Build Up and should not be used by any other parties. To the fullest extent permitted by the law, we do not accept or assume liability to any party other than the directors of Build Up, for our work, for this report, or for the conclusion we have reached.

We agree to the publication of this assurance report in Build Up's SS202C for the financial year ended 31 December 202C, provided it is clearly understood by recipients of the SS202C that they enjoy such receipt for information only and that we accept no duty of care to them whatsoever in respect of this report.

The logo for Ernst & Young, featuring the company name in a stylized, cursive script.

Ernst & Young Consulting Sdn. Bhd.  
200801010331 (811619-M)

Kuala Lumpur, Malaysia  
28 April 202D

## Material Matters (Appendix)

As we strive to create value for the organisation and our stakeholders, it is imperative to understand both the impact of the sustainability matters on our business as well as the impacts of our business practices to our stakeholders and the environment.

Our materiality assessment helps us in evaluating our key sustainability risks and opportunities to ensure that they are being managed effectively. We conduct a full-scale materiality assessment once every 3 years to engage with both our internal and external stakeholders, which allows us to identify issues that are critical to them and our business as well as to assess and realign our strategies.

SRG 3.5b

In FY202A, Build Up conducted a comprehensive materiality assessment that comprises 3 phases: Identification, Prioritisation, and Validation.

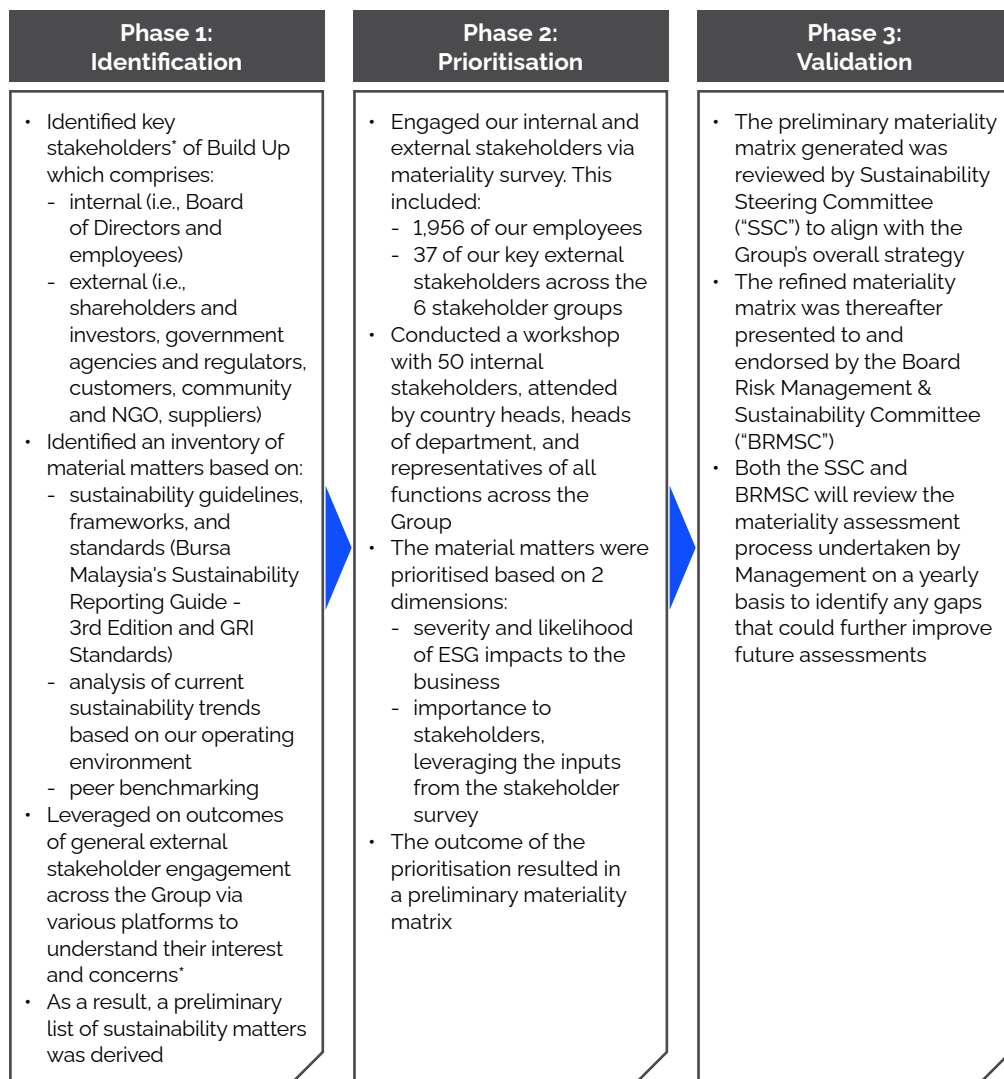
MAIN 5.1

ACE 5.1

SRG 3.5a

GRI 3-1

### Build Up's Materiality Assessment Process



SRG 3.1a

SRG 3.1b

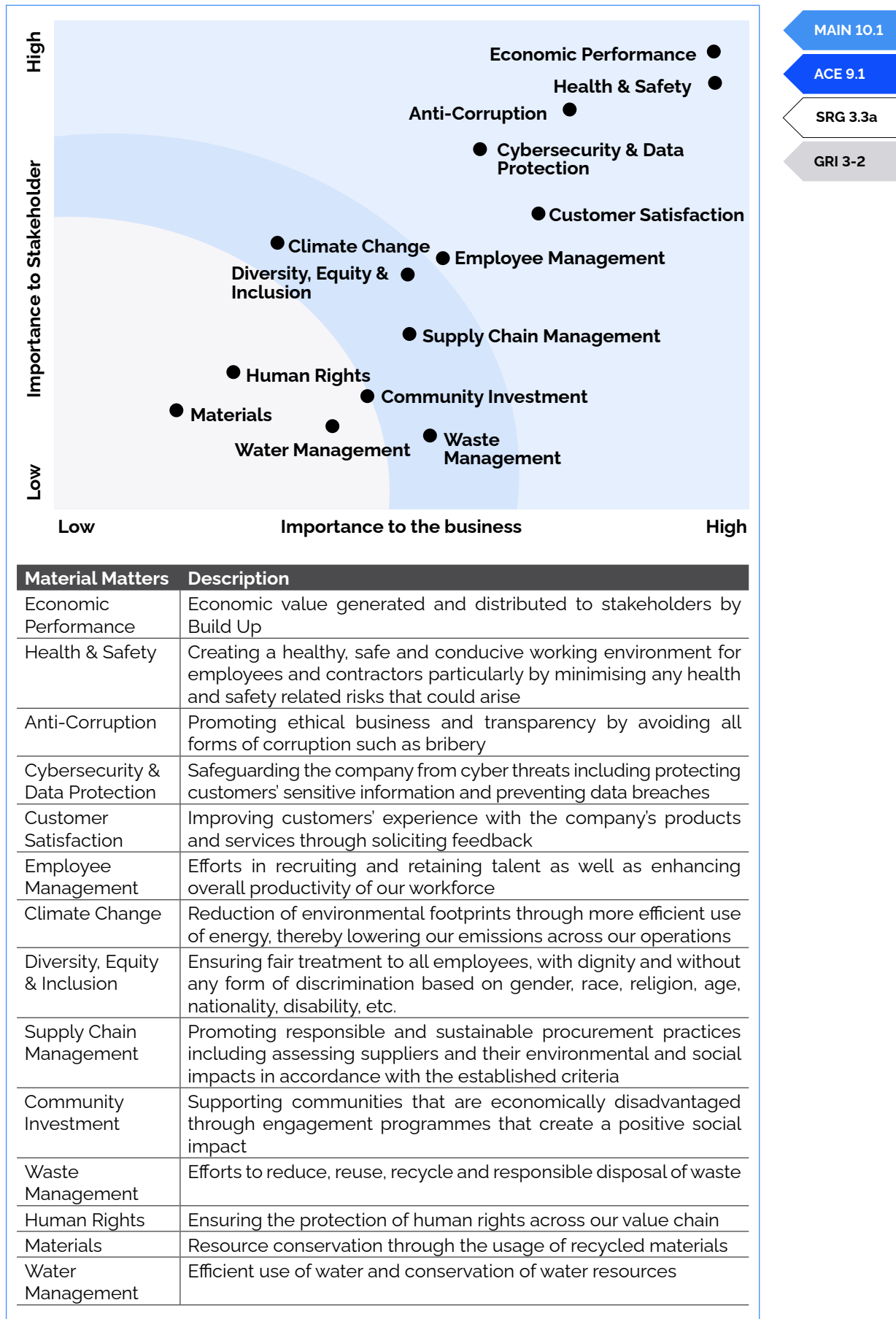
SRG 3.2a

SRG 3.4a

SRG 3.4b

*Note: \*For further information on our identified key stakeholders and their area of interest or concerns, please refer to Stakeholder Engagement section (page 14 to 16).*

## FY202A Materiality Matrix



## Commentaries

### Bursa Malaysia's Listing Requirements

#### MAIN 5.1

**Paragraph 6.2, Practice Note 9, Main LR:** In making the Sustainability Statement, a listed issuer must include disclosures on the following:

- (c) material sustainability matters and –
  - (i) how they are identified;

#### MAIN 8.1

- (e) a statement on whether the listed issuer has subjected the Sustainability Statement to –

- (i) internal review by its internal auditor; or
  - (ii) independent assurance performed in accordance with recognised assurance standards, to strengthen the credibility of the Sustainability Statement, and if so, the subject matter(s) and scope covered. In addition, for independent assurance, the conclusions must also be disclosed;

#### MAIN 10.1

**Paragraph 6.3, Practice Note 9, Main LR:** For purposes of paragraph 6.2(c) above, sustainability matters are considered material if they:

- (a) reflect the listed issuer's significant economic, environmental and social impacts; or
- (b) substantively influence the assessments and decisions of stakeholders; and
- (c) fall under the common material sustainability matters as set out in Annexure PN9-A.

#### ACE 5.1

**Paragraph 6.2, Guidance Note 11, ACE LR:** In making the Sustainability Statement, a listed corporation must include disclosures on the following:

- (c) material sustainability matters and –
  - (i) how they are identified;

#### ACE 7.1

- (d) a statement on whether the listed corporation has subjected the Sustainability Statement to –

- (i) internal review by its internal auditor; or
  - (ii) independent assurance performed in accordance with recognised assurance standards, to strengthen the credibility of the Sustainability Statement, and if so, the subject matter(s) and scope covered. In addition, for independent assurance, the conclusions must also be disclosed;



**ACE 9.1**

**Paragraph 6.3, Guidance Note 11, ACE LR:** For purposes of paragraph 6.2(c) above, sustainability matters are considered material if they:

- (a) reflect the listed issuer's significant economic, environmental and social impacts; or
- (b) substantively influence the assessments and decisions of stakeholders; and
- (c) fall under the common material sustainability matters as set out in Annexure GN11-A.

## **Bursa Malaysia's Sustainability Reporting Guide (3<sup>rd</sup> Edition)**

### **Chapter 5: Materiality Assessment, Disclosure Guidance 1: Identification of sustainability matters**

**SRG 3.1a**

Question (a): As part of the company's process for identification of sustainability matters, has the company disclosed the internal & external sources used for the identification of sustainability matters?

**SRG 3.1b**

Question (b): As part of the company's process for identification of sustainability matters, has the company disclosed the stakeholder groups (both internal and external) engaged for the identification of sustainability matters?

### **Chapter 5: Materiality Assessment, Disclosure Guidance 2: Prioritisation of sustainability matters**

**SRG 3.2a**

Question (a): As part of the company's process for prioritisation of material sustainability matters, has the company disclosed the stakeholder groups engaged for the prioritisation of its material sustainability matters?

### **Chapter 5: Materiality Assessment, Disclosure Guidance 3: Illustration of prioritisation of material matters via a materiality matrix**

**SRG 3.3a**

Question (a): Has the company provided an illustration of its prioritised material sustainability matters via a materiality matrix, clearly showing the relative importance of each matter?

### **Chapter 5: Materiality Assessment, Disclosure Guidance 4: Review and validation of materiality assessment process and outcome**

**SRG 3.4a**

Question (a): Has the company's senior management reviewed and/or approved the process and outcome of the materiality assessment undertaken?

**SRG 3.4b**

Question (b): Has the company's board approved/validated/endorsed the outcome of the materiality assessment undertaken?

**Chapter 5: Materiality Assessment, Disclosure Guidance 5: Frequency of materiality assessment process review**

**SRG 3.5a**

Question (a): Has the company disclosed the nature of assessment undertaken for the reporting year (full or limited scale) as well as underlying justifications?

**SRG 3.5b**

Question (b): Has the company disclosed the frequency of undertaking materiality assessment?

**Chapter 10: Statement of Assurance, Disclosure Guidance 1: Content of Statement of Assurance –**

**SRG 7.1a**

**Question (a):** To what extent has the sustainability statement been subjected to an assurance process?

**GRI Standards**

**GRI 2: General Disclosures 2021**

**GRI 2-5**

**Disclosure 2-5:** External assurance

**GRI 3: Material Topics 2021**

**GRI 3-1**

**Disclosure 3-1:** Process to determine material topics

**GRI 3-2**

**Disclosure 3-2:** List of material topics

# Climate-related Financial Disclosure Requirements for ACE Listed Corporations: Transition Plan towards a Low Carbon Economy

Build Up is cognisant of the various emerging climate-related risks and unfolding opportunities that are present as the world transitions to a low carbon economy at an accelerated pace. Accordingly, the Group recognises the need to be able to adapt and remain relevant in this shifting ecosystem. Guided by the Task Force on Climate-Related Financial Disclosures ("TCFD") Recommendations, we have commenced the identification, assessment and management of climate change impacts and determined a list of potential opportunities for Build Up.

ACE 10.1

## Governance

The Board has ultimate oversight over the implementation of our Climate Transition Strategy which incorporates the considerations of transition and physical risks as well as unfolding opportunities within it. This is a permanent agenda item parked under the Board Risk Management & Sustainability Committee ("BRMSC").

TCFD 1a

*Note: For further information on our governance for climate change, please refer to our Sustainability Governance section (page 12 to 13).*

## Strategy: Climate Transition Strategy

We have conducted focus group discussions with our internal stakeholders at the different geographical locations of operations to identify localised climate risks relevant to the Group. We have subsequently determined appropriate climate mitigation and adaptation plans and established a commitment to reduce our carbon emissions.

ACE 10.2

TCFD 2a

Risks Category	Risks	Build Up's response
Transition risk	Enhanced emissions-reporting obligations	<ul style="list-style-type: none"> <li>Established a Sustainability Steering Committee ("SSC"), led by the Chief Sustainability Officer</li> <li>Identify emissions baseline and medium-term reduction targets</li> <li>Provide relevant emissions management training to all data owners</li> </ul>
Physical risk	Increased extreme weather events such as floods	<ul style="list-style-type: none"> <li>Ensure climatic restrictions is considered when managing and planning projects by:               <ul style="list-style-type: none"> <li>developing a flood risk assessment for new developments</li> <li>building a drainage system to prevent flash floods</li> </ul> </li> </ul>

Opportunities Category	Opportunities	Build Up's response
Product and services	Promote a low-carbon economy by integrating sustainable practices into our operations	<ul style="list-style-type: none"> <li>• Optimising energy efficiency and reducing carbon emissions, where possible through:               <ul style="list-style-type: none"> <li>- use of Industrialised Building System ("IBS")</li> <li>- sustainable procurement by sourcing locally manufactured and recycled content materials as well as technology products</li> <li>- adoption of green certification tools for our developments such as Leadership in Energy and Environmental Design ("LEED") and Green Building Index ("GBI")</li> <li>- invest in solar photovoltaic ("PV") in majority of our property developments projects and incorporating efficient cooling systems</li> </ul> </li> <li>• Investing and developing IT solutions that can assist clients to monitor, track and reduce their carbon footprint in order to meet their climate change commitments</li> </ul>
Markets	Tapping into new markets	<ul style="list-style-type: none"> <li>• Pursuing partnerships with global and/or local industry leaders in developing efficient, zero carbon buildings to access new clients and geographical markets in the medium term</li> </ul>
Resilience	Participation in renewable energy	<ul style="list-style-type: none"> <li>• Continue to explore and establish strategic partnership with interested parties to expand on clean energy opportunities</li> </ul>

We will be able to better monitor our performance once we have completed our carbon emissions baselining exercise early next year. Additionally, the Group is looking forward to establishing medium-term targets for our material environmental matters which are "Climate Change" and "Waste Management".

The Group will consider conducting scenario analysis in the future to assess the feasibility of executing our transition plan and associated targets using different scenarios and assumptions that might contribute or hinder our progress. We will strive to provide consistent and transparent annual disclosures to our stakeholders, in line with Bursa Malaysia's Listing Requirements.

## Commentaries

### Bursa Malaysia's Listing Requirements

**Paragraph 6.4, Guidance Note 11, ACE LR:** A listed corporation must disclose its plan to transition towards a low-carbon economy ("transition plan") in a dedicated section within the Sustainability Statement, and include the following information:

#### ACE 10.1

(a) the role of the board and senior management in overseeing and executing the transition plan; and

#### ACE 10.2

(b) the strategies and initiatives to reduce climate-related risks and increase climate-related opportunities

### TCFD Recommendations

#### TCFD 1a

**Governance, Recommended Disclosure (a):** Describe the board's oversight of climate-related risks and opportunities

#### TCFD 2a

**Strategy, Recommended Disclosure (a):** Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term

# Glossary

List of Abbreviations	
ABC	Anti-Bribery and Corruption
ABMS	Anti-Bribery Management System
APEC	Asian Pacific Economic Cooperation
BMS	Building Management System
BRMSC	Board Risk Management and Sustainability Committee
CG	Corporate Governance
CIS	Construction Industry Standard
CoC	Code of Conduct
CRM	Customer Relationship Management
CRP	Corporate Risk Profile
CSS	Customer Satisfaction Survey
ERM	Enterprise Risk Management
ESG	Environmental, Social and Governance
GBI	Green Building Index
GDPR	General Data Protection Regulation
GHG	Greenhouse Gas
GRI	Global Reporting Initiative
HIRARC	Hazard Identification, Risk Assessment, and Risk Control
HSE	Health, Safety and Environment
IBS	Industrialised Building System
ILO	International Labour Organisation
IPCC	Intergovernmental Panel on Climate Change
ISO	International Standard Organisation
IT	Information Technology
KPIs	Key Performance Indicators
LEED	Leadership in Energy and Environmental Design
LR	Listing Requirements
LTI	Lost Time Incident
LTIR	Lost Time Incident Rate
MACC	Malaysian Anti-Corruption Commission
MCCG	Malaysian Code on Corporate Governance
NGFS	Network for Greening the Financial System
NGO	Non-Governmental Organisation
OHS	Occupational Health and Safety
OHSMS	Occupational Health and Safety Management Systems
PDPA	Personal Data Protection Act
RCP	Representative Concentration Pathway
RIC	Risk, Integrity and Compliance
SBTi	Science Based Targets initiative
SDGs	Sustainable Development Goals
SMEs	Small and Medium Enterprises
SORMIC	Statement on Risk Management and Internal Control
SSC	Sustainability Steering Committee
SWG	Sustainability Working Group
TCFD	Task Force on Climate-related Financial Disclosures
UNGC	United Nations Global Compact
QLASSIC	Quality Assessment System in Construction

