

PRIVASIA Technology Berhad ("PRIVASIA") is pleased to present its Sustainability Report 2024, which outlines the Group's progress in advancing its Environmental, Social, and Governance ("ESG") commitments. This report serves as our principal annual disclosure on sustainability matters and should be read in conjunction with the Annual Report 2024.

Unless otherwise stated, the information and data presented herein cover the period from 1 January 2024 to 31 December 2024, and apply to PRIVASIA's operations across its three core business segments: Information Technology ("IT"), Information and Communication Technologies ("ICT"), and Satellite-based Network Services ("SAT"). References to "PRIVASIA", "the Group", "the Company", "we", or "our" collectively refer to PRIVASIA Technology Berhad and its subsidiaries.

In 2024, PRIVASIA adopted several internationally and nationally recognised emissions methodologies to enhance the accuracy, consistency, and transparency of our greenhouse gas reporting. These include:

- The UK Department for Energy Security and Net Zero's emissions factors (updated as of 30 October 2024);
- II. The International Civil Aviation Organisation (ICAO) Carbon Emissions Calculator (ICEC)—the official United Nations tool for quantifying the carbon footprint of air travel; and
- III. The latest Peninsular Malaysia electricity emissions factor from MyEnergyStats, the portal managed by the Energy Commission of Malaysia.

We remain committed to expanding the scope and boundaries of our disclosures to include all relevant stakeholders across our value chain. This report has been prepared in accordance with the Global Reporting Initiative ("GRI") Universal Standards and is aligned with key local and international sustainability frameworks, including:

- United Nations Sustainable Development Goals ("UNSDG");
- II. Bursa Malaysia Illustrative Sustainability Report Guide, 3rd Edition;
- III. ISO 26000 Guidance on Social Responsibility







In anticipation of Bursa Malaysia's enhanced sustainability disclosure requirements—which mandate the implementation of the Task Force on Climate-related Financial Disclosures ("TCFD") by 2025—PRIVASIA has outlined a preliminary transition strategy towards a low-carbon economy. This marks an important step in elevating ESG reporting standards among ACE Market-listed entities.

This report also contains forward-looking statements intended to provide stakeholders with insight into the Group's strategic direction and sustainability aspirations. These statements are not forecasts or guarantees and should be interpreted with appropriate discretion.

While this report highlights key material sustainability topics, a more detailed breakdown of PRIVASIA's performance data can be found in the Group Sustainability Performance Data 2024 section on pages 26 to 29.

We welcome feedback and enquiries, and encourage stakeholders to contact us via the details below:

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Our Approach To Sustainability

Introduction

Sustainability underpins how we do business and how we respect and create value for our stakeholders. It has been ingrained in our processes, policies, business values, and company culture for many years. Today, ESG goals are a vital element of our corporate strategy.

Our sustainable approach to creating longterm value helps us deliver positive outcomes for stakeholders, minimise adverse impacts, contribute to society and conserve the environment.

Company

Our primary focus is mainly on value creation for all stakeholders. Our vision is to elevate sustainability through governance, transparency via engagement with direct board oversight and accountability over social, environmental and economic issues.

Services

We endeavour to provide the best quality service to all our clients as they are part of our esteemed valued stakeholders. Aligning Our Sustainability Focus Areas With The United Nations Sustainable Development Goals (UNSDG)





Governance

I. Develop and maintain a system of governance aligned with the best national and international standards and practices.



People

- I. Foster the involvement, well-being and development of our people.
- II. Continually improve, innovate and guarantee high safety standards along the value chain.



Environment

- I. Achieve carbon neutrality by 2035.
- II. Reduce environmental footprint with a circular economy approach.





Innovation

 Play an essential part in supporting our clients and community in the digitalisation of our nation.





Community

 Contribute to the social, technological and economic development of our communities.

Sustainability Governance

Materiality Assessment 2024

Identification Of Sustainability Matters



Identified key issues and defined stakeholders

BOARD OF DIRECTORS Deliberating on and appropriately sustainability-related strategies and objectives.

GROUP CEO/ MANAGING DIRECTOR

Prioritisation Of Material Sustainability Matters

Conducted an online survey across 7 stakeholder groups to validate the material matters

SUSTAINABILITY
WORKING COMMITTEE
Represented by the operating companies
Head of Departments, they are responsible ir
executing all sustainable measures cascaded

Review And Validation Of Process And Outcome



Board of directors confirmed relevance of identified material matters

Introduction

We are committed to protecting our people, environment, assets and reputation. Good governance is instrumental in upholding a history of high ethical standards and improving the Group's decision-making processes. It forms the foundation of our sustainability strategy.

The Board of Directors of the Group is responsible for supervising the Group's sustainability and ESG strategy, which encompasses climate-related matters.

Dedicated to embedding sustainability within our long-term growth strategy, our Board of Directors is firmly committed to seamlessly integrating the sustainability governance structure into our corporate governance framework. This includes incorporating sustainability factors into the development of our strategies and the implementation of our business plans.

Introduction

Materiality assessments are formal exercises that engage stakeholders to learn how vital sustainability issues are to them. These insights guide strategy and communication and help PRIVASIA tell a more meaningful sustainability story. This exercise forms one of the channels used to maintain continuous engagement with our stakeholders.

We conduct periodic materiality assessments to identify ESG issues linked to the stakeholder interests and relevant to business success. We assess the importance of these issues to our stakeholders and the Group. The assessment helps prioritise areas which matter the most to key stakeholders and our business.

In 2022, we performed a comprehensive materiality assessment. The process, led by an external consultant, identified 13 critical topics grouped into three main pillars: Economic, Environmental and Social. The study reviewed market trends, peers and competitors and reporting frameworks. The review ranks the importance of different topics to PRIVASIA and its stakeholders.

Stakeholder Engagement, Issue Prioritisation And Results

In 2024, we conducted a materiality validation exercise to ensure alignment with stakeholders needs and aimed at responding to evolving stakeholder expectations and addressing emerging risks, concentrating on issues that have the most substantial impact, and are closely aligned with our business strategies.

Materiality Assessment Topics

Introduction

PRIVASIA queried stakeholders on the importance of 13 Economic, Environmental and Social issues. These issues, along with their related GRI topics and the UNSDGs, are presented in the table below.



MATERIAL ISSUE	DESCRIPTION	RELATED GRI-TOPIC	RELATED UNSDG
ECONOMIC			
Regulatory Compliance	Preventing anti-competitive behaviour and corruption while complying with all other economic, environmental and social legislation	Anti-Competitive Behaviour Environmental Compliance Socio-economic Compliance	3 GOOD HEATH AND WILL-REPORT HOTEL BETTER AND STRICK HOTEL HOTEL BETTER HOTEL H
Sustainable Supply Integrating environmentally and		I. Procurement Practices	8 DECENT WORK AND 12 RESPONSELE FEMOURE GROWTH 12 CONSUMPTION
Chain Management socially viable practices into the complete supply chain life cycle.	socially viable practices into the complete supply chain life cycle	II. Supplier Environmental Assessment	AND PRODUCTEN
		III. Supplier Social Assessment	
Industrial Advancement & Nation Building	Advancing the industry and nation with High-Speed Internet Access and other software and IT services	I. Indirect Economic Impacts	1 POPULATY 1 POPULATY 1 POPULATY 2 STRINGTON 2 STRINGTON 3 SECOND WORK ARM 1 SECOND



MATERIAL ISSUE	DESCRIPTION	RELATED GRI-TOPIC	RELATED UNSDG
ENVIRONMENT			
Energy & Climate Change	Managing and reporting our energy and greenhouse gases produced by our data centres and vehicles	I. Energy II. Emissions	7 ATTROMETED 8 EXTENSIONS AND THE PROPERTY OF
Waste	Minimising e-waste, paper and all types of waste and recycling whenever possible	I. Effluents And Waste	3 MODIFICATION 11 SIGNAPARI (TEXT) AND WILLESTED 11 SIGNAPARI (TEXT) AND CHARACTERS THE PROPERTY OF THE P

Materiality Assessment Topics (continued)



MATERIAL ISSUE	DESCRIPTION	RELATED GRI-TOPIC	RELATED UNSDG
SOCIAL			
Diversity, Equal Opportunity & Non- Discrimination	Promoting diversity and equal opportunities and eliminating all forms of discrimination in the workplace	Diversity And Equal Opportunity Non-Discrimination	4 GONDEY BECAUSE S GONDEY BECOME AND 10 HERCERS BECOME CHOCKE 10 HERCERS
Community Contributions	Having a positive influence on local communities through charitable contributions and Corporate Social Responsibility initiatives	I. Local Communities	1 ***
Human Rights	Protecting all aspects of human rights, including protecting the indigenous population, staff welfare and security and ensuring there is no child or forced labour	Human Rights Assessment Rights Of Indigenous Peoples Security Practices V. Child Labour V. Forced Labour	2 HMG 8 RESHT WORK AND TOOLNING GENTRI WORK AN
Employee Engagement	Respecting employees' rights to joint representation and consultative practices	Labour/Management Relations Freedom Of Association And Collective Bargaining	8 ECCENT MODEL AND ECCENTRIC CHRONICE
Training And Development	Providing training and education to employees to expand their knowledge base for career development	I. Employment II. Training And Education	3 ADDITION 4 SOUTH 5 SOUTH 1 S
Health & Safety	Keeping all customers and employees safe and free from injury, electromagnetic fields ("EMF") and non-communicable and infectious diseases	Occupational Health And Safety Customer Health And Safety	3 GOOD HELL HERE NOTICE HERE 16 PARK PRIDE I AND STRICK HERE 17 PARK PRIDE I AND STRICK HERE 18 PARK PRIDE I AND STRICK HERE 19 PARK PRIDE I AND STRICK HERE 10 PARK PRIDE I AND STRICK HERE 11 PARK PRIDE I AND STRICK HERE 12 PARK PRIDE I AND STRICK HERE 13 PARK PRIDE I AND STRICK HERE 14 PARK PRIDE I AND STRICK HERE 15 PARK PRIDE I AND STRICK HERE 16 PARK PRIDE I AND STRICK HERE 17 PARK PRIDE I AND STRICK HERE 18
Quality & Customer Satisfaction	Promoting quality through our software and services to ensure high levels of customer satisfaction	I. Marketing & Labelling	12 reported to concentrate And Product Districtions
Data Privacy & Cybersecurity	Protecting all data in our software and IT services, including confidential business data and other data	I. Customer Privacy	12 exceeded considerate And product the

Materiality Matrix



IMPACT ON PRIVASIA'S BUSINESS AND REPUTATION

Priority Summary

- 1 Quality & Customer Satisfaction
- 2 Data Privacy & Cybersecurity
- 3 Community Contributions
- 4 Training & Development
- 5 Regulatory Compliance
- 6 Energy & Climate Change
- 7 Health & Safety
- 8 Human Rights
- 9 Waste
- 10 Sustainable Supply Chain Management
- **11** Diversity, Equal Opportunity & Non-Discrimination
- 12 Employee Engagement
- 13 Industrial Advancement & Nation Building





Stakeholder Engagement

Defining Stakeholders

PRIVASIA values stakeholder input and is committed to proactive and constructive engagement with a wide range of stakeholders on local, national and international levels. Engaging with stakeholders allows us to achieve transformation across the industry value chain beyond our immediate activities. These meaningful engagements have also helped us improve our sustainability policies and strategies to meet the needs of stakeholders.

PERSONS OR GROUPS WITH A VESTED INTEREST IN OUR SUSTAINABILITY OR ECONOMIC, ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) PERFORMANCE

PERSONS OR GROUPS WHOM OPERATIONS AFFECT SIGNIFICANTLY

ENCACEMENT METHOD



INDIVIDUALS IN PUBLIC
POSITIONS WHO
INFLUENCE BUSINESS
ACTIVITIES

9

Please refer to the table, which details the interests and critical concerns, engagement methods employed, and key engagement outcomes for the respective stakeholder groups.

We carefully consider the interests and concerns of stakeholders in our strategy, management decisions and operations.

We are committed to making information on these impacts publicly available in formats and languages relevant to the affected stakeholders.

STAKEHOLDER GROUP	ENGAGEMENT METHOD & FREQUENCY	AREAS OF INTEREST	OUR APPROACH
SHAREHOLDERS AND INVESTORS	Annually Annual Reports Annual General Meetings Materiality Survey Quarterly Quarterly Reports Ad-Hoc Press Releases Extraordinary General Meetings Company Website	Risk Management Corporate Governance Company Reputation	Develop robust corporate governance policies including the Anti-bribery and Anti-corruption ("ABC") Policy, Whistleblowing Policy, Board Charter etc II. Identify and minimise potential risks through risk assessments III. Develop beneficial relationships with the media to ensure balanced and accurate news coverage for PRIVASIA
PUBLIC	Company Website Bursa Website (Stock Code : PRIVA0123) Annual Report		
REGULATORS	Bursa Malaysia (Bursa) Lembaga Hasil Dalam Negeri (LHDN) Suruhanjaya Syarikat Malaysia (SSM) Royal Malaysian Customs Department (RMCD)	Legal Compliance	Establish policies to ensure compliance with relevant legislation and regulatory requirements
EMPLOYEES	Annually Team Building Employee Satisfaction Survey	Corporate Direction and Updates	Conduct employee engagement programmes to motivate and maintain close communication
	<u>Weekly</u> Departmental Meetings <u>Ad-Hoc</u> Festive Celebrations	Workplace Health & Safety Mental Well-Being	II. Conduct training programmes to support career growth, personal development and instil a culture of teamwork and excellence
	Training & Talent Development Whistleblowing Channel		III. Provide a safe, inclusive and conducive working environment
CUSTOMERS	Annually Customer Satisfaction Surveys	Customer Service & Experience	Engagement with customers
SUPPLIERS/ CONTRACTORS	Annually Supplier Performance Evaluations Vendor Registrations Contract Negotiation	Governance compliance Fair Procurement	Conduct supplier/contractor evaluations

SUSTAINABILITY REPORT 2024 STAKEHOLDER ENGAGEMENT

Economic

Sustainable Procurement



ICT infrastructure plays a substantial role in catalysing economic growth, especially in today's internet and mobile telecommunication era. We strongly believe a robust information communication technology infrastructure can boost the nation's economic growth.

Digitalisation has shown us that it is the largest social equaliser and economic multiplier. It continues to be the catalyst that steers societal transformations toward a more sustainable world. PRIVASIA delivers the most robust infrastructure to our most ambitious projects shaping the country's bright future through the following segments: Outsourcing and consulting, digital procurement solution, Information and Communication Technologies Distribution, Information and Communication Technologies Services, Satellite-Based Network Services and Radio Network Optimisation Services.

PRIVASIA creates economic and social impact by providing direct and indirect employment opportunities in our operations and business partnerships with suppliers and vendors.



As one of South East Asia's largest premium ICT outsourcing services and solutions providers, PRIVASIA has introduced PROCUREHERE.

This cloud-based Source-to-Pay ("S2P") digital procurement solution can change how high-growth organisations manage spending. The system gains unparalleled control and visibility with streamlined workflows, real-time data and innovative features to organise, allocate, track and report on spending from a single platform.

PROCUREHERE promotes transparency in procurement activities and significantly weeds out potential corruption with its audit trail functions

We aim to deliver easy-to-use, cost-effective procurement solutions that increase productivity and help businesses reduce administrative headaches with lower costs.

CONVENTIONAL PROCUREMENT	PROCUREHERE - CLOUD-BASED PROCUREMENT
Ineffective And Inefficient	End-To-End Support
High Potential Of Maverick Buying	Streamline Workflow With Real-Time Data At Your Fingertips
High Rate Of Paper And Space Wastage	Efficient Sourcing With Real-Time Price Comparison
High Human Error Rate	Cloud-Based SaaS - Available 24/7 Anywhere

Internet Connectivity



Internet connectivity has already changed many aspects of individual lives, providing far-reaching economic and social benefits. Extending these opportunities to developing economies accelerates economic and social growth while enabling the transition from a resource-based to a knowledge-based economy.

A fast and reliable internet connection is mandatory for running an effective business. An unreliable, slow, or lagging internet can affect employees' productivity and hamper business growth.

PRIVASIA has dedicated significant resources to laying fibre cables inside buildings and outside plants. This work has improved the connectivity in most areas where there were previously no or poor services.

Benefits Of Digital Procurement

Simplified E-Sourcing

PROCUREHERE's RFX features provide simplified e-sourcing for all your RFI, RFP, RFQ, RFA and RFT (Tender) events. RFX is a common acronym used in the procurement landscape and it captures all references to Request for Proposal ("RFP"), Request for Information ("RFI"), Request for Quote ("RFQ"), and Request for Bid ("RFB").

Spend Analytics

PROCUREHERE's Spend Analytics assist in collecting and cleaning historical data, providing real time spend data for planning and compliance initiatives.

Procure-To-Pay

Digitise and streamline buying, approvals, payments, compliance and delivery on a single platform.

Supplier Management PROCUREHERE's Supplier Management tool provides a comprehensive streamlined solution for managing all of your suppliers across the entire supply chain process.

10 ECONOMIC PRIVASIA TECHNOLOGY BERHAD

Sustainable Procurement (continued)

PROCUREHERE Advantages To Buyers

PROCUREHERE Advantages To Suppliers

Superior Qualitative Selection

Healthier

Supplier

Base

Relationship

I. Access to a larger pool of suppliers II. Resulting in a lower cost of purchase III. Improve the quality of purchase

Trusted By Over 34,000 Suppliers

Accommodation & Food Services

Administrative, Waste Management & Remediation

III. Agriculture, Forestry, Fishing & Hunting

Art, Entertainment & Recreation

Educational Services

I. A centralised database for all suppliers' details V Construction

II. Reduce operation time

VII. Finance & Insurance Leverage PROCUREHERE's global supplier

Optimal VIII. Healthcare & Social Assistance Supplier community and third-party data to continually

minimise risk, lower purchase costs and improve Manufacturing

quality across all approved contracts. Real Estate (Rental & Leasing) Χ. XI. Retail Trade

Enhanced I. Up-to-date Supplier Rating XII. Transportation & Warehousing

Performance II. Enhanced due diligence XIII. Utilities Management

III. Ease of supplier onboarding XIV. Wholesale Trade And Many More

Easy Provides suppliers with a single place for Greater I. Access to large corporate buyers, GLCs, Onboarding everything they need while giving them Market MNCs and conglomerates

choice on going digital, from email to the Access II. Increasing productivity and growth PROCUREHERE's Supplier Portal.

Effective Optimal Automatically notify suppliers of outstanding Automated Delivery Order (DO) and invoice Supplier information when they are submitting invoices or

generation, an online, easy-to-access portal view receiving Purchase Orders (POs). Experience which reduces supplier risk of missing or losing information with manual legacy processes.

> Optimal Surface requests for supplier information when Turnaround issuing new POs or when suppliers submit invoices to get the information buyers need, minimising delay and turnaround time.

High-Standards PROCUREHERE's Supplier Management helps Of Transparency suppliers monitor their risk.

> Optimise buyer supply base with risk scores drawn from the data of supplier interactions from across the PROCUREHERE global supplier

community.

Automation

ECONOMIC 11 SUSTAINABILITY REPORT 2024

Sustainable Procurement

Local Procurement

The business landscape is continuously evolving. PRIVASIA prefers to source locally whenever possible. Environmentally, local buying has a lower carbon footprint as it uses less transportation. Local sourcing also helps stimulate the growth of the local community through employment opportunities and tax payments.

Benefits Of Local Procurement

- I. Reduced Supply Chain Costs
- II. Reduced Currency Risk
- III. More Flexibility
- IV. Greater Control
- V. Reduced Environmental Impact
- VI. Supports Local Communities
- VII. Increased Revenue

Suppliers Standard

PRIVASIA conducts an annual supplier performance evaluation to evaluate the suppliers' actual products, service quality, cost competitiveness, delivery performance and technical capabilities. The evaluations reduce the risk of non-performing suppliers and justify continuing supply-chain relationships. Specifically, the supplier performance evaluation helps PRIVASIA:

- Select suppliers with a good reputation for a repeat purchase
- II. Identify poor-performing suppliers and replace them with a better alternative.
- III. Identify suppliers who can reduce costs and improve delivery efficiency, which increases business performance

Performance Evaluation Criteria In Supplier Assessment Form

- I. Meet Delivery Schedules
- II. Meet Tests Or Specification Requirements
- III. Response To Instructions
- IV. Honour Warranties And Guarantees
- V. Management Commitment
- VI. Quality Of Goods Or Services Received
- VII. Cost Competitiveness
- VIII. Sustainability And Environmental Compliance
- IX. Financial Stability
- X. E-Commerce Capability

PRIVASIA'S Supplier Data

	202	22	202	23	202	24
ECONOMIC	%	VAR	%	VAR	%	VAR
SUSTAINABLE PROCUREMENT						
LOCAL SUPPLIERS ENGAGED (%)	90.8%	(2.2%)	92.00%	+1.3%	95.68%	+4.0%
FOREIGN SUPPLIERS ENGAGED (%)	9.2%	+2.2%	8.00%	(13.0%)	4.32%	(46.3%)
LOCAL SUPPLIER PURCHASES (%)	91.1%	(0.9%)	91.86%	+0.9%	98.53%	+7.2%
FOREIGN SUPPLIER PURCHASES (%)	8.9%	+11.3%	8.14%	+9.0%	1.47%	(81.5%)
ANTI-CORRUPTION & ANTI-BRIBERY	NO	VAR	NO	VAR	NO	VAR
NUMBER OF SUBSTANTIATED CORRUPTION CASES	0	-	0	-	0	-
FINES RELATED TO CORRUPTION (RM)	0	-	0	-	0	-
CONTRIBUTIONS TO POLITICAL PARTIES (RM)	0	-	0	-	0	-

VAR denotes Variance Percentage Year on Year

12 ECONOMIC PRIVASIA TECHNOLOGY BERHAD

Sustainable Procurement

Ethics And Compliance



Placing respect, accountability and integrity at the core of our decision-making process is vital to support our ambition, creating value and earning the trust of our stakeholders. These values are our most important assets and integral to the long-term business strategy.

All directors and employees periodically review PRIVASIA's formal Code of Conduct and Ethics. On 22 February 2024, the Board reviewed and updated the Code of Ethics and Conduct to be in line with the current changes made to the Bursa Listing Requirements.

The core areas of conducts under the Code of Ethics and Conduct include the followings: -

- Conflict Of Interest;
- II. Confidential Information;
- III. Inside Information And Securities Trading;
- IV. Business Records And Control;
- V. Compliance To The Law;
- VI. Personal Gifting And Contribution;
- VII. Health And Safety;
- VIII. Sexual Harassment;
- IX. Anti-Corruption And Whistle-Blowing;
- X. Anti-Money Laundering;
- XI. Fair And Courteous Behaviour; And
- XII. Misconducts

Anti-Bribery And Corruption

PRIVASIA recognises the threats and hazards posed by corruption and improper business practices. PRIVASIA upholds and promotes integrity, truth and transparency in all aspects and at every level of its operations.

PRIVASIA strictly adheres to the provisions of the Malaysian Anti-Corruption Commission Act 2009 ("the Act") and all relevant regulations, guidelines and orders of the Act. PRIVASIA's Anti-Bribery and Corruption Policy ("ABC Policy") formalises the responsibilities of the management and employees on what constitutes gratification and how to deal with bribery and corruption issues.

PRIVASIA extends this obligation to all its business partners and stakeholders, including third-party suppliers, vendors, service providers, customers, distributors, business contacts, agents and members of public office.

In addition to the Service Provider Integrity Pledge, every supplier must complete a supplier due diligence questionnaire/declaration form. This form and procedure confirm that:

- The Company, directors, key senior management and shareholders have clean records and have received no fines, other than traffic offences, if any, in the last 5 years;
- II. The supplier has a Code of Conduct or Policy, including Anti-Bribery and Corruption, Anti-Money Laundering and Counter Financing of Terrorism;
- III. Privacy requirements have been established;
- IV. A dedicated officer oversees the Company's compliance with local laws and regulations.

All suppliers are vetted for their legitimacy by checking their Company Registration certificates (ROC/ROB) and CTOS verification.

No disciplinary action or dismissal resulted from non-compliance with anti-corruption; and there were zero cases and zero penalties in 2024.

SUSTAINABILITY REPORT 2024 ECONOMIC 13

Sustainable Procurement

(continued)

Ethics And Compliance (continued)

No Gift Policy

PRIVASIA's No Gift Policy prohibits all employees and their family members from, directly or indirectly, receiving or giving third-party gifts, entertainment and hospitality. PRIVASIA does not make and will not accept any facilitation payments or kickbacks.

The general principle is to refuse or return such gifts immediately. Accepting a gift is allowed only in limited circumstances, such as if it is reasonable in conjunction with celebrating various festivals in Malaysia. However, receiving gifts is governed by strict conditions. For example, a personal gift must not exceed RM300 and must be entered in the Gift and Hospitality Register.

Strictly Prohibited Gifts

- I. Cash Or Cash Equivalents
- II. During A Tender Or Competitive Bidding
- III. With Expected Or Desirable Outcome
- IV. Breaching Any Local Or Foreign Bribery And Corruption Laws
- V. Lavish Or Excessive

Political Contributions

PRIVASIA does not make charitable donations or contributions to any public body, political parties or politically motivated projects without management approval for any legitimate purpose. PRIVASIA made no payments to political parties during the year.

Whistleblowing

PRIVASIA encourages stakeholders to report genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation. The Whistleblowing Policy stipulates corruption or bribery reporting framework and offers complete protection under the policy and Whistleblower Protection Act 2010.

The policy covers all stakeholders, including shareholders, directors, employees, partners, contractors, suppliers, clients, customers, government parties, professional organisations and associated companies or subsidiaries.

We make every step to keep the Whistleblower's identity confidential. We expect any person involved in the investigation process to keep the Whistleblower's identity, the nature of the concern, and all involved confidential.

PRIVASIA has established a dedicated channel where whistleblowers can submit a report confidentially via email to whistleblowing@privasia. com. The ARMC members receives these emails and reports them as per the Whistleblowing policy. The committee decides on the appropriate disciplinary or corrective action and submits them to the Board of Directors of PRIVASIA for their review and approval.

PRIVASIA received Zero or No whistleblowing emails in 2024.

Supporting The ICT Industry



PRIVASIA has the vision to be the largest premium ICT outsourcing services and solutions provider in South East Asia with the most significant number of clients. PRIVASIA works with its industry partners to improve the business climate in the interests of the ICT industry to promote industry growth in line with national aspirations.

PRIVASIA is a member of numerous trade associations, working alongside other ICT businesses to define the future and consider the impact of the ICT and digital industry. These industry associations perform many functions that lead to better policy, practice and standards. Throughout the year, our experts actively participated in working groups to discuss industry standards, achieve greater customer savings, and deliver advanced ICT outsourcing solutions to the market.

The following table presents PRIVASIA's group and individual memberships.

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CORPORATE MEMBERSHIPS	INDIVIDUAL MEMBERSHIPS	
NATIONAL TECH ASSOCIATION OF MALAYSIA (PIKOM)	MALAYSIAN INSTITUTE OF ACCOUNTANTS (MIA) - Datuk Puvanesan A/L Subenthiran - Ms. Moganavani A/P Pramasivah	
INSTITUTE OF CHARTERED ACCOUNTANTS IN ENGLAND	ASSOCIATION OF CHARTERED CERTIFIED ACCOUNTANTS (ACCA) - Datuk Puvanesan	

A/L Subenthiran

- Ms. Moganavani

A/P Pramasivah

MALAYSIAN CONSORTIUM OF MID-TIER COMPANIES (MCMTC)

AND WALES

(ICAEW)

CONSTRUCTION INDUSTRY DEVELOPMENT BOARD (CIDB)

KUALA LUMPUR BUSINESS CLUB (KLBC)

14 ECONOMIC PRIVASIA TECHNOLOGY BERHAD

Environment



PRIVASIA is committed to minimising its environmental impact and addressing the challenges of climate change relating to its operations and the entire value chain. The Company has committed to responsibly managing energy use and natural resources for many years.

Recently, we have seen climate change and environmental impact take on increased importance for our employees, investors, customers and other stakeholders. Changing expectations led us to expand or accelerate programmes and policies designed to reduce the environmental impact of our operations.

Our efforts to minimise our environmental impact support the COP21 Paris Agreement of December 2016 and the last COP26 Glasgow Climate Pact of November 2021 on limiting global warming.

Currently, we are aligning our practices and reporting with the guidelines recommended by the Task Force on Climate-related Financial Disclosures (TCFD) and set science-based targets based on robust emissions data.

The Group upholds environmental concerns with an emphasis on applying the latest technological advancements and industry best practices that are environmentally safe.

Materials Management ICT is one of the fastest-growing greenhouse gas-emitting and energy management sectors. Multiple methodologies are available to assess the environmental impact of ICT but do not provide a consistent methodological framework for this assessment. A solution to this is the work developed in various European and International standardisation bodies such as ETSI, ITU-T, IEC, ISO and others. These methodologies assess this environmental impact, such as energy management and greenhouse gas ("GHG") emissions, in collaboration with industry, standardisation bodies and public authorities.

All imported telecommunication equipment conforms to the national SIRIM certification, ensuring the products adhere to Malaysian, Regional and International Standards. All products have been tested and certified following the Malaysian Communications and Multimedia Commission ("MCMC") technical specifications, technical codes, Malaysian or international standards, technical checklist or technical declaration.

In addition, PRIVASIA is committed to reducing paper use and monitors its efficiency at various levels throughout the Group. Saving paper by not printing saves money, uses less water, conserves energy and helps preserve trees. We are also digitising our processes as part of the Company's efforts to maximise resource use.

PRIVASIA'S

Paper Consumption and Disposal Data



As part of our continued commitment to environmental stewardship, PRIVASIA has maintained close oversight of our paper consumption, ensuring greater accuracy in reporting.

In 2024, our emissions figures appear marginally higher due to the adoption of the UK Department for Energy Security and Net Zero's latest emissions conversion factors (Updated 30 October 2024). These updated factors are recognised internationally and are intended to support consistent and transparent greenhouse gas reporting.

Nevertheless, our long-term performance remains encouraging. Between 2021 and 2024, PRIVASIA achieved a 51.1% reduction in paper usage and disposal-related emissions. This improvement reflects further shifts towards digital processes and more efficient operational practices.

From 2021- 2024, emissions were calculated using the disposal by landfill factor of 1,164.39015 kgCO2e per tonne of paper.

We remain committed to further reducing our environmental impact through continued digitalisation and responsible resource use.



SUSTAINABILITY REPORT 2024 ENVIRONMENT 15

Environment (continued)

Energy Management



Energy management is a crucial challenge, not only for us but for our entire industry. The Group's energy management involves:

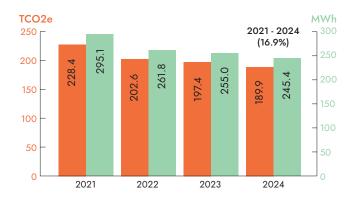
- Reducing costs through sustainable procurement and strategically decreasing consumption
- II. Reducing greenhouse gas emissions for improved sustainability performance
- III. Tracking utility costs to prepare more accurate budgets and gaining greater insight into operating costs
- IV. Reducing reliance on supply chains that do not share our environmental protection commitment

PRIVASIA'S
Indirect Energy:
Electricity
Data



Electricity emissions for 2021 to 2024 have been recalculated using updated Grid Emissions factors (0.774 TCO2e/MWh) from MyEnergyStats, the national portal managed by the Energy Commission of Malaysia. Based on this more accurate methodology, PRIVASIA recorded a 16.9% reduction in electricity consumption-related emissions from 2021 to 2024.

This reflects our continued efforts to optimise energy efficiency across our operations.



Moving To The Cloud PRIVASIA has migrated its on site servers to AWS. AWS is extremely energy efficient and on a path toward empowering its operations with 100% renewable energy by 2040. This migration of on-premise servers to the cloud helps to offset PRIVASIA's greenhouse gas emissions.

By partnering with AWS—the world's largest corporate purchaser of renewable energy—Privasia advances its renewable energy initiative by leveraging AWS's commitment to sustainability, including its 65% renewable energy usage and The Climate Pledge, aligning both companies toward a low-carbon, climate-forward future.

Carbon Management



Carbon management is vital for addressing our contribution to climate change, reducing greenhouse gas emissions, and the challenging problem of global warming.

As grid electricity is the primary energy source for our properties, higher electricity consumption results in higher carbon emissions. We address energy-related issues by improving the efficiency of operations to reduce their carbon footprint and utility costs.

In 2024, PRIVASIA adopted the UK Department for Energy Security and Net Zero's emissions factors (Updated 30 October 2024) and the International Civil Aviation Organisation (ICAO) Carbon Emissions Calculator (ICEC). The ICEC is also the Official UN Tool to quantify Air Travel CO2 Footprint.

These updated emissions factors are recognised internationally and are intended to support consistent and transparent greenhouse gas reporting.

Carbon
Footprint
Calculations

Consolidation Method	100% Of Emissions	
For Calculating	From Controlled	
The Carbon Footprint	Operations	
Organisational	Accounts For 100%	
Boundary For	Of GHG Emissions	
Calculating The	From PRIVASIA's	
Carbon Footprint	Asset Portfolio	

Scope 1

Scope 2

Electricity from the national grid powers our data centres and offices. In 2024, the CO2 emissions from electricity usage were derived using the updated grid emission factor published by MyEnergyStats, a portal managed by Energy Commission of Malaysia.

Our support staff use petrol for travel to and

from clients' premises.

Scope 3

PRIVASIA has developed a comprehensive system for monitoring and reporting its Scope 3 emissions. The Group monitors emissions from employee travel, air travel, water consumption and waste paper.

SCOPE	EMISSIONS FACTOR
Air Travel	International Civil Aviation Organisation (ICAO) Carbon Emissions Calculator (ICEC).
Employee Business Travel (Air And Road)	UK Department for Energy Security and Net Zero - Updated 30 October 2024
Employee Work Commuting	UK Department for Energy Security and Net Zero - Updated 30 October 2024
Electricity Usage	MyEnergyStats - Portal managed by Energy Commission of Malaysia
Water Supply Usage	UK Department for Energy Security and Net Zero - Updated 30 October 2024
Waste Generated (Paper)	UK Department for Energy Security and Net Zero - Updated 30 October 2024

16 ENVIRONMENT PRIVASIA TECHNOLOGY BERHAD

Environment (continued)

Carbon Management (continued)

Water



PRIVASIA'S Water Withdrawal From Municipal Supplies Data

2021 - 2024 KGCO2e **M3** +1.3% 120 116.2 116.5 119.0 118.0 0 100 759.0 761. 77 80 60 40 20 2021 2022 2023 2024

Emissions from municipal water supply have been recalculated using the latest emissions conversion factors from the UK Department for Energy Security and Net Zero (updated 30 October 2024). These factors, widely adopted by UK and international organisations, enhance consistency in greenhouse gas reporting.

From 2021 to 2024, emissions from water treatment saw a marginal increase of 1.3%, based on a grid emissions factor of 0.15311 kgCO2e per cubic metre of water.

Managing Waste



Water is a limited, shared resource, and a reliable water supply is essential. We take responsibility for all water-related challenges wherever we operate. PRIVASIA manages its water-related risks according to our needs and water availability.

We monitor the volume of water used and aim to reduce its use by continuously improving water efficiency across operations. The Group conducts regular assessments of water-consuming systems to ensure no leaks and upgrades to modern, water-saving appliances where possible. We also have clear water preservation guidelines and ensure all staff conform.

Managing Waste (continued)

Our Waste Management Objectives

Breakdown Of E-Waste By Type And Disposal Method

E-Waste Upcycling E-waste is a growing challenge, matching the growth of the ICT industry. E-waste contains substances, such as mercury, cadmium and lead, that can be hazardous to human health and the environment if not dealt with properly. Our policy is to donate, sell and recycle E-waste whenever possible.

We always consider the safety and environmental factors in all our operational decisions and explore potential opportunities to minimise any adverse impact from the erection and dismantling of telecommunications or information-related systems and equipment operations, waste disposal and energy consumption.

- I. Prevent Health Hazards
- II. Minimise Pollution
- III. Reduce Landfill Problems
- IV. Conserve Natural Resources
- V. Create Local Employment Opportunities
- VI. Promote A Circular Economy

PRIVASIA sources disposal companies or waste generators with an E-Waste SW110 license, such as Hedaka Sdn. Bhd. ("Hedaka") and SISJ Usahawan Sdn. Bhd ("SISJ") to buy its decommissioned IT equipment for refurbishment, parts or scrap.

Issued by the Ministry of Environment, a SW-110 license ensures PRIVASIA that the waste from electrical and electronic assemblies containing components such as accumulators, mercury switches, glass from cathode-ray tubes and other activated glass or polychlorinated biphenyl-capacitors, or contaminated with cadmium, mercury, lead, nickel, chromium, copper, lithium, silver, mangane are managed responsibly.

All electronic products have a life expectancy (End Of Life). Once they stop functioning or become obsolete, users discard them as waste without considering reusing them.

MATERIAL	TOTAL WEIGHT (KG)
GLASS	169
PLASTIC	70
RUBBER	7
METAL	859
PCB BOARD	15
MIX EQUIPMENT	20
WASTE RESIDUE	17
TOTAL	1,157

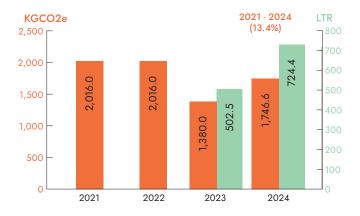
Business expansion presents greater responsibility to operate more sustainably. We embrace circularity and resource efficiency as key levers to reduce

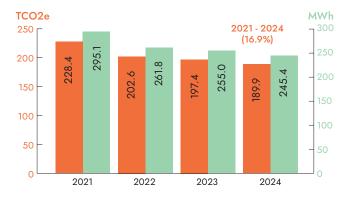
Our sustainability approach includes adopting a Solid and Hazardous Waste Management framework to reduce our operations' environmental impact progressively. Establishing Solid Waste Management and Hazardous Waste Management Guidelines ensures all future wastes are recycled, reused or appropriately treated.

Currently, we dispose of generated wastes through a contractor accredited by the local government. We ensure contractors remove this waste from our premises according to the schedule set by the Department of Environment.

SUSTAINABILITY REPORT 2024 ENVIRONMENT 17

PRIVASIA'S Emissions Data 2024







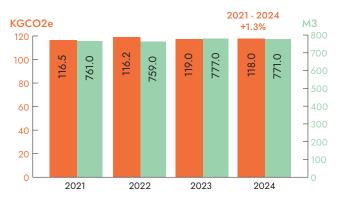
Scope 1 -Company Owned Vehicle

Direct GHG emissions that a company generates while performing its business activities



Scope 2
Indirect Energy:
Electricity
Consumption

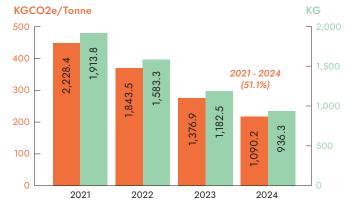
Indirect GHG emissions that come from the production of energy that a company purchases and uses





Scope 3 Water Withdrawal From Municipal Supplies

Energy used to extract, store and supply water to household and businesses.

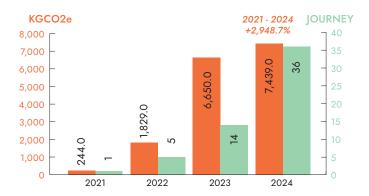




Scope 3 -Paper Consumption and Disposal

Energy used to supply water and wastewater treatment processes.

18 ENVIRONMENT PRIVASIA TECHNOLOGY BERHAD





Scope 3 -Business Travel (Air)

Indirect GHG emissions of business travel by air

As part of our continued commitment to environmental stewardship, PRIVASIA adopted several internationally and nationally recognised emissions methodologies to enhance the accuracy, consistency, and transparency of our greenhouse gas reporting. These include:

The UK Department for Energy Security and Net Zero's emissions factors (updated as of 30 October 2024);

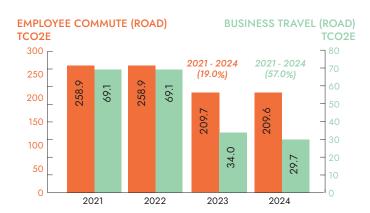
The International Civil Aviation Organisation (ICAO) Carbon Emissions Calculator (ICEC)—the official United Nations tool for quantifying the carbon footprint of air travel; and

The latest Peninsular Malaysia electricity emissions factor from MyEnergyStats, the portal managed by the Energy Commission of Malaysia.

We remain committed to further reducing our environmental impact through continued digitalisation and responsible resource use.

Environmental Sustainability Programme







Scope 3 -Employee Commute To Work (Road)

All other indirect GHG emissions from employees travelling to and from their workplace



Scope 3 -Business Travel (Road)

All other indirect GHG emissions from business travel in vehicles that are not owned or operated by the reporting company

Engaging all employees in day-to-day corporate sustainability efforts is the key to creating a vibrant and sustainable company. This year, PRIVASIA continued its "GO GREEN" campaign to promote and support the practices of using resources in an environmentally friendly manner.

We initiated the following initiatives to preserve the environment:

- Monthly reminders via our internal newsletter, PRIVABYTES, to be conscious of reducing paper and energy usage and wastage. We also update all employees on the Group's progress in our Sustainability Programmes.
- Email signature with a Green Reminder that every unnecessary and unprinted email helps the environment.
- Encouraging staff to print on recycled paper, use a double-sided format and print in black and white;
- IV. Communicating via emails, including pursuing a "paperless" office solution (e.g. HR System – PeopleESS to reduce paper usage);
- Closely monitoring water and electricity consumption by reminding employees and switching off lights and air-conditioning during non-peak hours); and
- VI. Positioning recycling bins on all floors of PRIVASIA's headquarters.

SUSTAINABILITY REPORT 2024 ENVIRONMENT 19

Social: Our People First



Our people are essential to successfully delivering our strategy and sustaining our long-term business performance. We accelerate the development of our people, grow and strengthen their leadership capabilities and enhance their performance through solid engagement.

We aim to provide decent and productive employment while considering employees' overall welfare and development. We support the United Nations Sustainable Development Goal No. 8: "To promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all."

Providing fair compensation and benefits is vital to our People First commitment. Our rewards strategy motivates employees by paying competitive base salaries according to the level of complexity of the function in the organisation. We position our salary structure competitively compared to market rates. Our Job Grading Framework guides us in hiring and promotion and is the foundation for career progression, training and performance management.

PRIVASIA strictly adheres to local minimum wage labour regulations. Basic offered salaries are at least 34% higher than the minimum wage rate mandated by the Minimum Wage Order of Malaysia. We practise equal pay for equal work, basing pay and remuneration strictly on position and job scope, irrespective of gender.

Our benefits and compensation packages also improve employee welfare which includes but not limited to various welfare facilities, services and schemes include maternity leave, paternity leave, medical/personal accident insurance, subsidy for new child expenses, yearly health screening, optical, dental and subsidised telecommunication expenses.

The Group's performance appraisal system allows employees to achieve financial rewards directly related to their business performance and contributions. Incentives are computed based on the objectives and key performance indicators we defined in our corporate performance management framework.

This framework ensures all employee rewards are fair and unbiased, based on their personal, department and company performance. In addition to the quarterly half-yearly performance appraisals, all employees receive an evaluation for work performed to promote learning and embrace opportunities for career development through informal verbal feedback from their immediate superiors.

During the year employee medical coverage was reviewed to be competitive with the market.

Employee Engagement And Talent Management



Online Training Programmes Conducted Our employees are instrumental in the company's success. Attracting, developing, and retaining talented employees is a priority for our business and strategy. Employee engagement is a crucial driver of employee performance and business results. PRIVASIA has a proactive approach to employee engagement and organised various social activities throughout the year, such as games, festive celebrations, sports and wellness events, team building, monthly birthday celebrations for employees and Corporate Social Responsibility programmes.

PRIVASIA's comprehensive talent management programme comprises induction and onboarding, internal and external skills training, on-the-job training, career development, annual performance reviews and succession planning.

The following table summarises the training programmes held during the year.

ONLINE TRAINING	DATE
Successful Negotiation :	1 Jan 2024 -
Master Your Negotiation Skills	31 Jan 2024
Understanding Strategic	1 Jan 2024 -
Marketing	31 Jan 2024
Train The Trainer 101 :	1 Jan 2024 -
For Beginners Only	31 Jan 2024
Write Betters Emails : Tactic For	1 Jan 2024 -
Smarter Teams Communication	31 Jan 2024
Negotiation Skills :	1 Jan 2024 -
Complete Guide	31 Jan 2024
Communication Skills : Become	1 Jan 2024 -
Clear, Concise, Confident	31 Jan 2024
Create B2B Sales : Cold Calling	1 Jan 2024 -
Scripts & Value Proposition	31 Jan 2024
Cold Calling For B2B Sales : How To Prospect Over The Phone	1 Jan 2024 - 31 Jan 2024
Best Practice In	1 Jan 2024 -
Document Management	31 Jan 2024
Minute Taking At Meeting	1 Jan 2024 - 31 Jan 2024

Employee Engagement And Talent Management (continued)

Training Programmes Conducted

TRAINING/WORKSHOP	DATE
IT Business Analysis	15 - 16 Jan 2024
NIOSH-Tenaga Safety Leader Passport	16 Jan 2024
Techvolution 2024	27 Feb 2024
Practical Payroll Computation Workshop (Compliant With The New Employment Amendment Act 2022)	6 - 7 Mar 2024
2024 Finance Innovation Summit	6 - 7 Mar 2024
Practical Payroll Computation Workshop	6 - 7 Mar 2024
Mastering & Managing Emotions For Success Workshop	10 Mar 2024
Webinar On Latest Development On Service Tax 2024	14 Mar 2024
E-Invoicing And Financial Statement Analysis	20 - 21 Mar 2024
MEF Tax Seminar 2024 - Strengthening National Economy, Accelerating Business Growth	23 Apr 2024
Endpoint Central Workshop Malaysia 2024	25 Apr 2024
ManageEngine ITOM Workshop	16 May 2024
Recent Developments With The Listing Requirement Including COI Amendments	5 Jun 2024
Effective Implementation Of Safety And Health Committee	5 - 6 Jun 2024
Mandatory Accreditation Programe Part Ii : Leading For Impact (LIP)	22 Mar 2024 5 - 6 Jun 2024
Communication Skill & Building Positively Form Within	24 - 25 Jun 24
Training Public GHG PQ Practitioner	1 Jul 2024
Latest Update On Service Tax Policy	4 Jul 2024
BSI Training Academy : Managing Greenhouse Gas Emissions (ISO140641)	1 - 4 Jul 2024
Beginner Guide to Consolidated Financial Statements	8 - 9 Aug 24
Accounts Support & Positive Work Attitude	19 - 20 Aug 2024
ITIL Foundation	6 - 8 Nov 2024
Asia Procurement Conference 2024	13 - 14 Nov 2024
PMP Foundation	15 - 17 Nov 2024 23 - 24 Nov 2024
Registration: Navigating Transfer Pricing In Malaysia	26 Nov 2024

PRIVASIA

Employee And Training Data 2024



TOTAL NUMBER OF EMPLOYEES



129
TOTAL NUMBER
MALAYSIAN EMPLOYEES



94.7% % TOTAL NUMBER OF EXECUTIVES



43.9% % OF FEMALE EMPLOYEES



29.0%

RATE OF EMPLOYEES
BELOW 30 YEARS OF AGE



7.0%
RATE OF EMPLOYEES
ABOVE 50 YEARS OF AGE



4

EMPLOYEES TURNOVER BELOW 30 YEARS OF AGE



20

EMPLOYEES TURNOVER 30-50 YEARS OF AGE



12

TOTAL TURNOVER OF FEMALE EMPLOYEES



938

TOTAL HOURS OF TRAINING



34.6% % OF WOMEN IN MANAGEMENT Employee Engagement And Talent Management (continued)

Succession Plannina PRIVASIA is a certified and authorised training employer for the prestigious Institute of Chartered Accountants in England and Wales ("ICAEW") professional body. We offer relevant training programmes as required by the ICAEW for our employees interested in pursuing a career as a certified chartered accountant.

Encouraging employees to obtain professional certifications is essential for their personal growth and adds credibility to their expertise. The Company pays for professional body membership subscriptions to advance their career growth potential.

A systematic approach is necessary to ensure leadership continuity. We constantly strengthen our performance management system, engaging our high-performing employees to assume more prominent roles and responsibilities. Career development planning based on employees' development needs and superiors' input also helps us build a pool of future leaders.

Recently, we enhanced the performance management system with a more open, collegiate and motivating approach.

A department performance matrix guides heads of department and line managers in setting individual key performance indicators for their employees. It also includes a career planning section to facilitate proper employee development plans. We continuously review our succession planning strategy to identify and develop high-potential employees to ensure a sufficient talent pool for future succession and leadership.

PRIVASIA recruits employees internally and promotes from within whenever possible, promoting 4 employees in 2024.

Diversity, Equity, Inclusion And Belonging



Workplace diversity drives better decisions, innovation and overall performance. While diversity has always been important, we are increasing our focus on diversity, equity, inclusion and belonging.

We aim to provide a welcoming environment and equitable opportunities for all employees regardless of background, nationality, race, ethnicity, gender identity, age, sexual orientation, marital status, disability or religion. This principle is ingrained in our company values and articulated in our Code of Conduct and Ethics.

Occupational Health And Safety



Health, Safety And Environment (HSE) Rules People's health and safety always come first at PRIVASIA. We are committed to protecting the health and safety of employees and contractors by providing a safe working environment, preventing workplace injuries and illnesses and providing access to healthcare.

Our Health, Safety and Environment ("HSE") Policy formalises our commitment to protecting people, assets and the environment. Complying with all relevant legislation ensures that the health and safety of all its employees are never compromised.

- Work with valid work permit required by the job
- II. Isolate electricity before starting work
- III. Obtain authorisation before overriding or disabling safety critical equipment
- IV. Gain authorisation before entering a confined space
- V. Protect against falls when working at height
- VI. Use correct personal protective equipment during hazardous work
- VII. Obtain authorisation before excavating or entering a trench
- VIII. Do not place yourself under a suspended load
- IX. Do not smoke outside designated areas or bring potential ignition sources areas without authorisation
- No using mobile phones or walkie-talkie while driving
- XI. Obey the speed limit
- XII. Use a seat belt

Introducing all effective prevention measures, especially on high-risk jobs such as climbing up satellite or communication towers, protects the safety of employees and subcontractors. Contractors and employees are adequately briefed and well-trained on safety precautions and procedures.

We also provide Personal Protective Equipment when our contractors and employees perform their duties.

Promoting Rights



We support human rights as outlined in the Universal Declaration of Human Rights, the core standards of the International $\bar{L}abour$ Organisation, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights. We strive to ensure that our activities do not infringe on human rights.

We expect our business partners to support the same human rights standards by committing to our Supplier Code of Conduct or an equivalent standard.

Our approach to human rights is emphasised in our Code of Conduct and Ethics and includes topics such as equal opportunity and nondiscrimination, health and safety and fair pay. Feedback from our employees is essential.

We have zero tolerance for child labour, forced labour and other human rights violations, including harassment and bullying in the workplace.

Our human rights compliance practices are not yet mature. We have yet to conduct formal human rights assessments on our operations and investment agreements, run training on our human rights policies or include human rights clauses in our investment agreements. We will address human risks progressively in the future.

Community



Building relationships with local communities is a priority. Our efforts convey our sincerity and commitment that we are their partner, now and in the long term. We favour programmes aligned with our corporate strategy that will impact our stakeholders, partners, and communities long-

PRIVASIA allows charitable donations and sponsorships for legitimate purposes only.

SPONSORSHIP DATE & CHARITABLE ORGANISATION	AMOUNT
27 FEBRUARY 2024 SWAG HOLDING - TECHVOLUTION 2024	RM5,000.00
10 SEPTEMBER 2024 KOPERASI USAHAWAN INKLUSIF MALAYSIA BHD. (KUIMB)	RM20,000.00

Product Responsibility



Product impact and innovation are critical to organic growth and our transformation into an ICT solutions company. We are proud of our competitive edge, differentiating us from other industry players.

In support of the 2030 Agenda for Sustainable Development, in particular Goal 9 and Goal 12, PRIVASIA introduced the following action plans to continue its efforts in fostering innovation and practising responsible operation:

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



- To verify Energy and Carbon Assessments for 2024-2027, which sets an example to all other industry players while supporting clients' and partners' ESG plans
- II. To continue developing circular economy initiatives with potential partners and subject matter experts to achieve carbon neutrality
- III. To have our Sustainability Reports audited by an independent third-party assurer

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



- I. To assess PRIVASIA's footprint and positive impacts
- II. To implement scalable and sustainable initiatives to increase the life cycle of materials and products
- III. To continue collaborating, developing and promoting circular economy initiatives
- IV. To work towards PRIVASIA's Inclusion in international and responsible reporting ESG ratings and accreditations

The following table summarises our contribution to these areas in support of the United Nations Development Goals.

Cost Advantage From A Strategic Partnership With Leading It Players

- Cost competitiveness on hardware and software with partner pricing
- II. Well-equipped with knowledge of the latest technology

Comprehensive ICT Solutions Offering Business Solutions In Key Areas

- III. Business Process Outsourcing
- IV. Consultancy and System Integration
- V. Procurement Management

Entrenched Position In The Ports & Logistics Segment For IT Outsourcing

- VI. One of the key players in the ports and logistics segment
- VII. Strong reference point: currently serving WESTPORTS one of the major ports in Malaysia

Innovativeness Through R&D

- VIII. PRIVASIA provides eProcurement management solutions using its highly acclaimed PROCUREHERE platform
- IX. Invested RM0.54 million in R&D in FYE 2024

24 PRODUCT RESPONSIBILITY PRIVASIA TECHNOLOGY BERHAD

Product Responsibility

Satisfaction Through Quality



SUSTAINABILITY REPORT 2024

Our quality strategy determines becoming our customers' most valued and trusted partner by focusing on excellent quality, reliability, and responsiveness. Strong customer focus, results-driven improvement programmes and a sustainable culture of quality excellence help deliver this strategy.

PRIVASIA's IT System Management Systems ("SMS") were certified with ISO/IEC 20000-1:2011 on 17 December 2018 and was upgraded to the ISO/IEC 20000-1:2018 standard on 22 February 2022 and renewed in December 2024 for 3 years till December 2027, covering:

- SMS supporting the provision of VSAT Communication;
- II. Service desk operation;
- III. Managed services; and
- IV. E-procurement and application maintenance support.

ISO/IEC 20000-1 is an SMS standard that specifies the requirements for the service provider to plan, establish, implement, operate, monitor, review, maintain and improve an SMS. The requirements include the design, transition, delivery and improvement of services to fulfil the agreed service.

The C-Band transmitters, broadband satellite routers and Ku-Band transmitters have received certificates of conformity from SIRIM.

The company established a set of procedures and management processes that form a service management system for effectively delivering customer services. A framework that includes regular internal and external customer reviews and robust customer key performance indicator ("KPI") and scorecard tracking supports our quality and reliability-focused approach to customers, allowing us to:

- I. Build closer relationships and more effective communication with our customers
- II. Understand their needs more clearly and adjust and sustain our quality performance to meet their expectations.

Our 24/7 dedicated customer help desk addresses customer complaints and feedback promptly.

We also conduct an annual customer satisfaction survey as part of the ISO requirements.

Cybersecurity And Data Privacy



As a digital company, cybersecurity and data privacy are essential to the success of our business. Customers rely on us to deliver our platforms and services safely and reliably while safeguarding their data. PRIVASIA operates in adherence to the Personal Data Protection Act ("PDPA") in both policy and practice. We commit to protecting employees' and customers' personal and professional information by keeping information secure and respecting the rights of individuals to protect their data

Our information security programme includes regular security risk assessments to assess and evaluate the effectiveness of our cybersecurity programme. We train employees in safeguarding and processing personal information and implement policies relating to the rights of individuals and privacy. We inform our customers about our privacy practices in various ways, including displaying a Privacy & Cookie notice on our website and as part of our marketing practices. We detail which personal information we collect, use and disclose, informing customers of their available rights and the choices for sharing their data.

Telecommunication facilities and communication towers emit an Electronic Magnetic Frequency that harms humans. We erect all communication facilities at a safe distance from the local community. The equipment used for our installation is certified by SIRIM Malaysia for safe usage. We restrict access to our facilities with proper fencing and lock facilities to prevent unauthorised entry.

All IT equipment imported and distributed by the Group has obtained SIRIM approval that meets the regulatory safety, emission, energy and quality standards. SIRIM approval ensures that products are tested and certified following the MCMC Technical Specifications/Technical Codes.

Public Safety: Monitoring The Safety Of Tele-Communication Facilities And Communication Towers



25

Summary - Group Sustainability Performance Data 2024



% indicates Ratio Percentages within each category

VAR denotes Variance Percentage Year on Year

	2022		2023		2024	
ECONOMIC	%	VAR	%	VAR	%	VAR
SUSTAINABLE PROCUREMENT						
LOCAL SUPPLIERS ENGAGED (%)	90.8%	(2.2%)	92.00%	+1.3%	95.68%	+4.0%
FOREIGN SUPPLIERS ENGAGED (%)	9.2%	+2.2%	8.00%	(13.0%)	4.32%	(46.3%)
LOCAL SUPPLIER PURCHASES (%)	91.1%	(0.9%)	91.86%	+0.9%	98.53%	+7.2%
FOREIGN SUPPLIER PURCHASES (%)	8.9%	+11.3%	8.14%	+9.0%	1.47%	(81.5%)
ANTI-CORRUPTION & ANTI-BRIBERY	NO	VAR	NO	VAR	NO	VAR
NUMBER OF SUBSTANTIATED CORRUPTION CASES	0	-	0	-	0	-
FINES RELATED TO CORRUPTION (RM)	0	-	0	-	0	-
CONTRIBUTIONS TO POLITICAL PARTIES (RM)	0	-	0	-	0	-



VAR denotes Variance Percentage Year on Year

	20	22	20	23	202	24
ENVIRONMENT	NO	VAR	NO	VAR	NO	VAR
ENERGY						
INDIRECT ENERGY: ELECTRICITY (kWh)	261,826	(11.3%)	255,023	(2.6%)	245,358	(3.8%)
INDIRECT ENERGY: ELECTRICITY (GJ)	943	(11.3%)	918	(2.6%)	883	(3.8%)
MATERIALS						
PAPER CONSUMPTION (KG)	1,583	(17.3%)	1,182	(25.3%)	936	(20.8%)
WATER						
TOTAL WATER WITHDRAWAL FROM MUNICIPAL SUPPLIES (M3)	759	(0.3%)	777	+2.4%	771	(0.8%)
EMISSIONS (TCO2E)						
SCOPE 1	2.017	-	1.380	(31.6%)	1.746	+26.5%
SCOPE 2	202.653	(11.3%)	197.388	(2.6%)	189.907	(3.8%)
SCOPE 3: EMPLOYEE BUSINESS TRAVEL (AIR)	1.829	+649.6%	6.650	+263.6%	7.439	+11.9%
SCOPE 3: EMPLOYEE BUSINESS TRAVEL (ROAD)	69.057	-	33.964	(51.2%)	29.718	(12.5%)
SCOPE 3: EMPLOYEE COMMUTING	258.938	-	209.714	(19.0%)	209.672	-
SCOPE 3: WATER USE	0.116	(0.8%)	0.119	+2.6%	0.118	(0.8%)
SCOPE 3: WASTE GENERATED (PAPER)	1.843	(17.3%)	1.377	(25.3%)	1.090	(20.8%)

- In 2024, we recalculated all our ENERGY Scope Emissions from 2021-2024, hence the figures appear marginally higher due to the adoption of the Updated Grid Emissions Factor from MyEnergyStats, the national portal managed by the Energy Commission of Malaysia.
- In 2024, we recalculated all our Scope 3 Employee Business Travel by Air from 2021-2024, hence the figures appear marginally lower due to the adoption of International Civil Aviation Organisation (ICAO) Carbon Emissions Calculator (ICEC).
- In 2024, we recalculated all Materials, Water, Materials and Scope 1, 2 and 3 emissions from 2021-2024, hence figures appear marginally higher due to the adoption of the UK Department for Energy Security and Net Zero's latest emissions conversion factors (updated 30 October 2024). These updated factors are recognised internationally and are intended to support consistent and transparent greenhouse gas reporting.

Summary - Group Sustainability Performance Data 2024 (continued)



% indicates Ratio Percentages within each category

VAR denotes Variance Percentage Year on Year

	2022		2023		2024	
SOCIAL	NO NO	~ %	NO NO	23 %	NO NO	%
WORKFORCE STRENGTH	.,•	,,	.,.	,,	.,.	,,
TOTAL NUMBER OF EMPLOYEES	141		144		122	
NUMBER OF NEW EMPLOYEES HIRES	3	2.1%	4	2.8%	4	3.3%
PERCENTAGE OF CONTRACTORS / TEMPORARY STAFF (%)	0	-	0	-	0	-
WORKFORCE BREAKDOWN BY NATIONALITY						
MALAYSIAN	136	96.4%	133	92.4%	113	92.6%
NON-MALAYSIAN	5	3.6%	11	7.6%	9	7.4%
WORKFORCE BREAKDOWN BY CATEGORY						
EXECUTIVES	132	93.6%	129	94.2%	117	95.9%
NON-EXECUTIVES	9	6.4%	8	5.8%	5	4.1%
WORKFORCE BREAKDOWN BY GENDER						
FEMALE	54	38.3%	59	41.0%	53	43.4%
MALE	87	61.7%	85	59.0%	69	56.6%
WORKFORCE BREAKDOWN BY AGE GROUP						
BELOW 30 YEARS	57	40.4%	46	31.9%	45	36.9%
30 - 50 YEARS	75	53.2%	89	61.8%	72	59.0%
ABOVE 50 YEARS	9	6.4%	9	6.3%	5	4.1%
WORKFORCE BREAKDOWN BY ETHNICITY						
MALAY	95	67.4%	88	61.5%	78	63.9%
INDIAN	33	23.4%	31	21.7%	29	23.8%
CHINESE	8	5.7%	10	7.0%	5	4.1%
OTHERS	5	3.5%	14	9.8%	10	8.2%
SOCIAL	NO	VAR	NO	VAR	NO	VAR
EMPLOYEE TURNOVER RATES (%)	16.3%	(65.9%)	27.7%	+69.6%	25.0%	(9.6%)
EMPLOYEE TURNOVER BY GENDER						
FEMALE	10	(16.7%)	14	+40.0%	12	(14.3%)
MALE	13	(76.8%)	25	+92.3%	24	(4.0%)
EMPLOYEE TURNOVER BY AGE						
BELOW 30 YEARS	10	(75.0%)	18	+80.0%	4	(77.8%)
30 - 50 YEARS	12	(55.6%)	19	+58.3%	20	+5.3%
ABOVE 50 YEARS	1	-	2	+100.0%	6	+200.0%
FEMALE REPRESENTATION IN THE MANAGEMENT						
NO. OF WOMEN IN MANAGEMENT	9	+50.0%	8	(11.1%)	9	+12.5%
% OF WOMEN IN MANAGEMENT	37.5%	+50.0%	30.8%	(17.9%)	34.6%	(5.5%)
NO. OF WOMEN IN TOP MANAGEMENT	2	-	3	+50.0%	3	-
% OF WOMEN IN TOP MANAGEMENT	22.2%	-	30.0%	+35.0%	33.3%	+11.1%
TRAINING AND DEVELOPMENT						
TOTAL TRAINING TIME (HOURS)	357	(7.5%)	854	+139.2%	938	+9.8%
AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE (HOURS)	14	-	13	(7.1%)	14	+7.7%

Sustainability Performance Report 2024 (Bursa ESG Platform)

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The adoption of Bursa ESG Reporting for ACE market listed companies is in FYE2027.

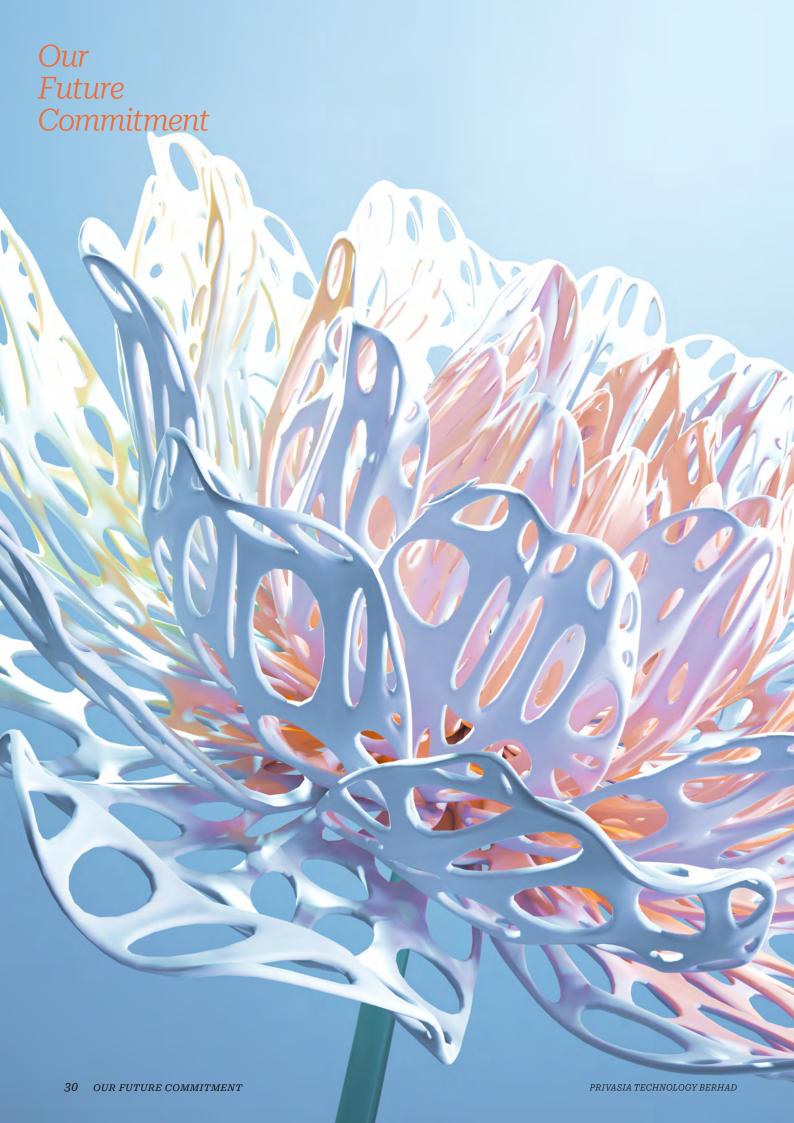
INDICATOR	MEASUREMENTS	2022	2023	2024
BURSA (ANTI-CORRUPTION)				
BURSA C1(A) PERCENTAGE OF EMPLOYEES WHO HAVE RECEIVED TRAINING ON ANTI-CORRUPTION BY EMPLOYEE CATEGORY				
MANAGEMENT	PERCENTAGE	0.00	0.00	0.00
EXECUTIVE	PERCENTAGE	0.00	0.00	0.00
NON-EXECUTIVE/TECHNICAL STAFF	PERCENTAGE	0.00	0.00	0.00
GENERAL WORKERS	PERCENTAGE	0.00	0.00	0.00
BURSA C1(B) PERCENTAGE OF OPERATIONS ASSESSED FOR CORRUPTION-RELATED RISKS	PERCENTAGE	0.00	0.00	0.00
BURSA C1(C) CONFIRMED INCIDENTS OF CORRUPTION AND ACTION TAKEN	NUMBER	0	0	0
DISCLOSURE OF TOTAL AMOUNT OF POLITICAL CONTRIBUTIONS MADE	MYR	0.00	0.00	0.00
BURSA (DIVERSITY)				
BURSA C3(A) PERCENTAGE OF EMPLOYEES BY GENDER AND AGE GROUP, FOR EACH EMPLOYEE CATEGORY				
AGE GROUP BY EMPLOYEE CATEGORY				
EXECUTIVE UNDER 30	PERCENTAGE	41.13%	37.50%	36.89%
EXECUTIVE BETWEEN 30-50	PERCENTAGE	46.10%	52.08%	55.74%
EXECUTIVE ABOVE 50	PERCENTAGE	4.96%	3.47%	3.28%
NON-EXECUTIVE UNDER 30	PERCENTAGE	3.55%	2.08%	0.0%
NON-EXECUTIVE BETWEEN 30-50	PERCENTAGE	3.55%	4.17%	3.28%
NON-EXECUTIVE ABOVE 50	PERCENTAGE	0.71%	0.69%	0.82%
GENDER GROUP BY EMPLOYEE CATEGORY				
EXECUTIVE MALE	PERCENTAGE	56.03%	54.17%	54.10%
EXECUTIVE FEMALE	PERCENTAGE	36.17%	38.89%	41.80%
NON-EXECUTIVE MALE	PERCENTAGE	5.67%	4.86%	2.46%
NON-EXECUTIVE FEMALE	PERCENTAGE	2.13%	2.08%	1.64%
BURSA C3(B) PERCENTAGE OF DIRECTORS BY GENDER AND AGE GROUP				
MALE	PERCENTAGE	62.50%	71.43%	85.71%
FEMALE	PERCENTAGE	37.50%	28.57%	14.29%
UNDER 30	PERCENTAGE	0.00%	0.00%	0.00%
BETWEEN 30-50	PERCENTAGE	62.50%	57.14%	57.14%
ABOVE 50	PERCENTAGE	37.50%	42.86%	42.86%
BURSA C4(A) TOTAL ENERGY CONSUMPTION				
ELECTRICITY USAGE	MEGAWATT	261.80	255.02	245.36
BURSA C6(A) TOTAL HOURS OF TRAINING BY EMPLOYEE CATEGORY				
TOTAL WORKFORCE TRAINING HOURS	HOURS	357	854	938
AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE	HOURS	14	13	14
BURSA C6(B) PERCENTAGE OF EMPLOYEES THAT ARE CONTRACTORS OR TEMPORARY STAFF	PERCENTAGE	0.00	0.00	0.00

Sustainability Performance Report 2024 (Bursa ESG Platform)

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INDICATOR	MEASUREMENTS	2022	2023	2024
BURSA C6(C) TOTAL NUMBER OF EMPLOYEE TURNOVER BY EMPLOYEE CATEGORY				
EXECUTIVE	NUMBER	22	39	34
NON-EXECUTIVE/TECHNICAL STAFF	NUMBER	1	0	2
NUMBER OF BOARD DIRECTORS	NUMBER	8	7	7
NUMBER OF INDEPENDENT DIRECTORS ON THE BOARD	NUMBER	6	5	5
NUMBER OF WOMEN ON THE BOARD	NUMBER	3	2	1
ANNUAL GENERAL MEETING: NUMBER OF DAYS BETWEEN THE DATE OF NOTICE AND DATE OF MEETING	NUMBER	66	62	57
PERCENTAGE OF WOMEN ON THE EXECUTIVE COMMITTEE OR EQUIVALENT	PERCENTAGE	37.50%	28.57%	14.29%
TOTAL NUMBER OF EMPLOYEES	NUMBER	141	144	122
NUMBER OF NEW EMPLOYEES HIRE	NUMBER	3	4	4
PERCENTAGE OF CONTRACTORS / TEMPORARY STAFF	PERCENTAGE	0.00	0.00	0.00
WORKFORCE BREAKDOWN BY NATIONALITY	NUMBER	-	-	-
BURSA (HEALTH AND SAFETY)				
BURSA C5(A) NUMBER OF WORK-RELATED FATALITIES	NUMBER	0	0	0
BURSA C5(B) LOST TIME INCIDENT RATE ("LTIR")	RATE	0.00	0.00	0.00
BURSA C5(C) NUMBER OF EMPLOYEES TRAINED ON HEALTH AND SAFETY STANDARDS	NUMBER	0	0	13
BURSA (SUPPLY CHAIN MANAGEMENT)				
BURSA C7(A) PROPORTION OF SPENDING ON LOCAL SUPPLIERS	PERCENTAGE	91.13%	91.86%	98.53%
BURSA (DATA PRIVACY AND SECURITY)				
BURSA C8(A) NUMBER OF SUBSTANTIATED COMPLAINTS CONCERNING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA	NUMBER	0	0	0
BURSA (WATER)				
BURSA C9(A) TOTAL VOLUME OF WATER USED	MEGALITRES	0.759	0.777	0.771
BURSA (EMISSIONS MANAGEMENT)				
BURSA C11(A) SCOPE 1 EMISSIONS IN TONNES OF CO2e	METRIC TONNES	2.02	1.38	1.74
BURSA C11(B) SCOPE 2 EMISSIONS IN TONNES OF CO2e	METRIC TONNES	202.65	197.39	189.91
BURSA C11(C) SCOPE 3 EMISSIONS IN TONNES OF CO2E (AT LEAST FOR THE CATEGORIES OF BUSINESS TRAVEL AND EMPLOYEE COMMUTING)	METRIC TONNES	329.82	250.33	246.83
PAPER CONSUMPTION (KG)	KILOGRAMS	1,583	1,182.5	936.3



PRIVASIA is committed to shaping a future where technology and innovation are both impactful and responsible. As a growing force in Malaysia's digital ecosystem, we aim to challenge the conventional boundaries of enterprise technology by developing solutions that are globally relevant, ethically grounded, and environmentally conscious.

In 2024, PRIVASIA adopted more stringent emissions methodologies to improve the accuracy and transparency of our carbon reporting. These include updated factors from the UK Department for Energy Security and Net Zero, the UN-endorsed ICAO Carbon Emissions Calculator, and MyEnergyStats' latest electricity emissions factor for Peninsular Malaysia.

These steps reflect our broader ambition to align with international best practices while advancing local sustainability standards. As we continue to grow, we remain focused on deepening our partnerships across the supply chain, inspiring innovation through responsibility, and supporting the transition to a more sustainable digital economy.

We thank all stakeholders for their continued trust and engagement, and we look forward to building a better, more sustainable future—together.



