SUSTAINABILITY FRAMEWORK

1. Policy Intent

In our quest to be a preferred financial services provider but more importantly, to continuously deliver long-term value for shareholders and other stakeholders as well as society at large, we recognise the importance of sustainability issues embedded into our values, policies and practices.

The sustainability issues will cover economic, environmental and social ("**ESS**") factors which impact our Group broadly and encompass the following key areas:

- a) *Economic* the economic conditions of our stakeholders and economic systems at local, national and international level;
- b) **Environmental** living and non-living natural systems, including land, air, water and ecosystems; and
- c) **Social** social systems within which we operate.

Increasing institutional investors are focusing of the progress of environmental, social and governance ("ESG") commitment by listed companies as important criteria for their investment decision consideration. Given that, the corporate behavior of the Group shall be guided by the Malaysian Code on Corporate Governance wherein the recommended principles and practices therein shall be embedded in the Board Charter, Terms of Reference of the Nomination Committee, Remuneration Committee and the Audit and Risk Management Committee and policies on Whistleblowing, Anti-Bribery and Anti-Corruption, Code of Conduct and Ethics etc.

2. Sustainability Practice

The Group will be guided by the ACE Market Listing Requirements and Sustainability Reporting Guide of Bursa Malaysia Securities Berhad ("Bursa Securities"). The approach in our communication with stakeholders on sustainability issues shall be based on the framework and guidance provided by Bursa Securities as well as the Global Reporting Initiative's sustainability reporting guidelines ("GRI"), focusing on the following 4 key areas:

- a) Stakeholder Inclusiveness being responsive to stakeholder expectation and interest;
- b) **Sustainability Context** presenting performance in the wide sustainability context;
- c) **Materiality** focusing on issues with greatest impact and are most important to the Group's business stakeholders; and
- d) **Completeness** including all information that is of significant ESS impact to enable stakeholders to assess the Group's performance.

3. Our Values

The Group's Code of Conduct and Ethics governs the standard of conduct and behavior expected of our Directors and employees, committing *inter-alia*, to:

- a) conduct business and act in an ethical and lawful manner;
- b) comply with all the relevant rules and regulations prescribed by the Securities Commission Malaysia ("SC"), Bursa Securities and by all other relevant authorities;
- c) conduct in a transparent and accountable manner;
- d) use of authority in a proper manner in the best interest of the Group;
- e) respect and care for the wellbeing of all employees and continuously identify opportunities for performing employees for career advancement; and
- f) act with appropriate decorum when acting as Board members and employees of the Group.

4. Sustainability Strategy

The strategies of integrating and embedding ESS factors into our business are to enable the Group and stakeholders (internal and external) to realize the following key benefits:

- a) Enhancing risk management, governance and transparency;
- b) Providing assurance to customers as a reliable financial services provider;
- c) Promoting innovation and attracting new customers;
- d) Enhancing talent management to sustain the businesses and operations;
- e) Maintaining the licenses and registrations required by the Group to undertake regulated activities under, amongst others, the SC's Licensing Handbook, Bursa Securities and other relevant authorities:
- f) Securing capital for growth and expansion purposes from shareholders and/or other external providers of funds e.g. banks;
- g) Improving productivity and cost optimization within the organisation; and
- h) Enhancing brand value and reputation in the market place.

Towards achieving the objectives of the sustainability strategy, the Board shall implement the following action plan whereby the Group shall:

- Emphasis, elevate and embed sustainability in the Group's governance, through engaging in Board oversight and accountability over ESS issues and maintain more diversity and special expertise on the Board and Board committees;
- Link employees' compensation with sustainability goals as part of their KPIs;
- Maintain regular and robust dialogues with key stakeholders of the Group on sustainability challenges, including employees, investors, suppliers, regulators and customers:
- Develop systematic performance improvements to achieve environmental neutrality and other sustainability goals across the entire value chain, including operations, supply chain and procuring and/or delivering of products and services; and
- Provide reliable and quality services that meet expectations of customers as they are part of the Group's valued stakeholders.

5. Governance Structure

The Board has the ultimate responsibility to ensure that sustainability efforts are embedded in the strategic direction of the Group. To assist the Board, the Corporate Sustainability Committee ("CSC") will be formed to spearhead our sustainability direction and implementation.

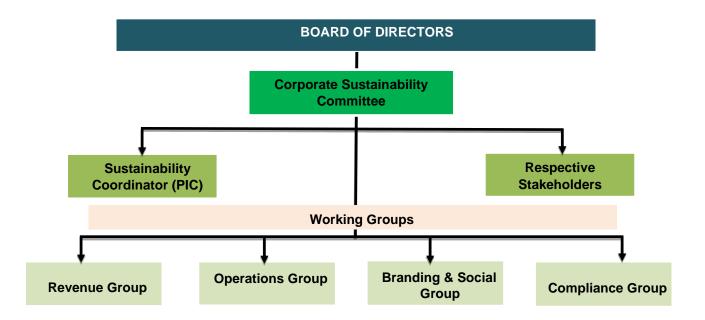
The CSC is established to oversee the formulation, implementation and effective management of our sustainability agenda in line with the sustainability strategy. This structure also encourages to continuously improving the sustainability initiatives in the Group.

The CSC shall assist the Board to prepare the Sustainability Report for inclusion in the Annual Report and clarify matters raised at Board meeting.

The CSC shall be headed by the Managing Director ("**MD**") or another person designated by the Board and to be supported by various working groups responsible for implementing the initiatives within the organisation.

The MD shall provide the Board on regular update relating to all key EES and related risks and opportunities concerning sustainability matters.

The organisation structure of the Group for sustainability is as follows:



Roles and Responsibilities of the Corporate Sustainability Committee

- To deliberate ESS issues related to the Group which includes various Head of Division/Departments.
- To assist on the sustainability reporting enhancement and to support comprehensive sustainability
 efforts.
- To enhance the materiality factors, metrics and targets to measure issues that are material to the business and move towards benchmarking the progress against international standards of sustainability reporting.
- To strengthen the approaches on the sustainability in terms of strategy, governance, materiality, economic, environmental and social.

Roles and Responsibilities of the Working Groups

- To plan, coordinate advice and implement sustainability initiatives.
- To recommend milestone and timeline, deliverables and outcome of initiatives to the CSC.
- Monitor and track Departmental or Business Units initiatives aligning to sustainability matters.
- To assemble input from the relevant departments and functions of the overall operational management of the sustainability matters.
- To identify material matters and material assessment process for deliberation and decision.

6. Materiality Assessment Process

Despite the ever changing landscape where the Group operates in, the Group shall continue to practice prudence in our risk appetites, remain vigilance on regulatory compliance and risk management but still stay focused on delivering quality and sustainable growth, whilst being watchful of emerging and disruptive risks impacting the Group. The Group is fully committed to uphold responsible financing which is reflected through its prudent infrastructure transformation as well as sustainability in its supply chain.

The 5 key processes of identifying materiality matters are depicted below:



1. Objectives & Scope

The Group shall undertake a materiality study within the top management and middle management to determine the objectives and scope of sustainability reporting. The scope and boundaries covers all our entities and operations in Malaysia.

2. Identification of Relevant Sustainability Matters

This process initiated with sustainability issues relevant to the Group and its stakeholders. In generating the list, the Group assesses the operating environment and emerging trends affecting our business sector. We then engaged with the internal stakeholders, the functional heads to derive and compile sustainability matters. The references include Bursa Securities's Sustainability Reporting Guide and Toolkits, and international standards such as the GRI standards.

Moving forward, we plan to undertake enhance review of material factors and sustainability matters in order to ensure that our understanding of both the current and future risks and opportunities facing our businesses/markets are adequately identified and addressed, as well as to gather stakeholders' perspectives and ensure we are responding to their needs. After we update our material factors, we will continue to evolve our management approach to ensure that we are addressing them in a holistic and integrated manner.

This may involve developing new policies and procedures, implementing various initiatives, measures and action plans, setting indicators as well as to establish a proper mechanism to capture, analyse and report sustainability data and information.

THE GROUP'S MATERIAL FACTORS

As we monitor, manage and report on a wide variety of issues, key to our approach is focusing our resources on material sustainability risks and opportunities that are associated with each material factor. Understanding our key priorities allows us to set our time, resources and investment to the best use. The materiality process involved several steps including:

- Identification of potential material topics by reviewing GRI aspects, benchmarking against key corporate peers and analyzing past reports, which reflects the feedback from customers, community representatives and employees generally.
- Inventory of aspects and topics most important to external stakeholders, customers and their supply chain vendors, based upon requests, surveys and ongoing engagement during the reporting period.

The prioritisation of some of the material issues are listed in the table below:

Key Materiality

Material Factors	Description	What Are The Risk	What Are The Opportunities
Competition	The Group is exposed to competition within the industry.	Lesser chance to secure business will impact the Company's business and performance.	 Innovative products and eco-friendly system could be offered to clients as to improve on our core value. Strategic partnerships and collaborations. Improved Technology based platform to enhance stockbroking capabilities.
Market Stability	A well-facilitated business, supported together with an effective and balanced regulatory framework that provides adequate levels of client's protection while facilitating business efficiency and innovation, is imperative for the continued growth and development of our businesses.	Any event – such as breaches in regulation, lack of effective corporate governance (CG) practices – that undermines integrity or stability will influence stakeholders' confidence, and possibly participation, in the market.	 Having a robust approach to ensure the integrity and stability of the market serves to engender trust and confidence, which in turn encourages participation and growth. Fostering a strong CG and sustainability culture will also drive long-term value, both in the market and within Bursa Securities.

Combining the views from stakeholders and Group's management from the preliminary materiality process, the materiality table has been derived to show the different levels of

importance of the sustainability matters. The prioritisation of the material factors was based on the gradation of our operating environment.

The Group will work further to reconcile and harmonise the initiatives and reporting of the materiality matters and to reflect better in the statement annually. The Group shall take necessary measurements and actions to manage the sustainable materiality in order to be in line with its corporate strategy.

Material Factors - Significance

		No	Factors	Why Material	Managing Materiality
> -		1	Market Condition	Market condition affects all businesses in every industry.	Our business very much depends on the market condition where we conduct market study prior engaging in any projects.
MATERIALITY		2	Liberalisation of the Regulatory Framework	Direct impact on revenue and business.	To be abreast with the regulatory requirements and directions. Focus on the ability to innovate to sustain in this business.
Ä		3	Optimization/ Resources	To facilitate the company to be efficient and effective.	Taking the necessary measures to ensure that all our staffs and resources are being optimised through automation and training.
		4	Compliance	Compliance with laws and regulations is one of our main requirements.	To provide adequate training and resources to ensure we meet compliance obligations.
	Very Important	5	Cyber Security	Cyber threats and data breach could devastate the entire operations and business.	To protect against cyber-attacks and to continuously enhance our cyber security measures.
	×	6	Service Quality	Delivery of services that at least meet customers' expectations.	To obtain customers' feedback to gauge our service quality.
		7	Reputation	To get a more realistic picture of how the business is actually being perceived by others.	To enhance our reputation by providing balance reporting and investors' engagement.
		8	Capital Injection Funds	To grow the business further.	Lookout for potential partners, joint venture and funding to expand our business.
		9	Customer Satisfaction	It is important for us to benchmark ourselves and to collaborate closely with customers to achieve mutual success.	To obtain feedbacks from our customers to maintain our service quality.

	10			
	10	Corporate Governance	To ensure that the company protects the members, officers and management.	Governance is conducted according to various regulations and sub committees. The Board shall oversees the governance based on quarterly review of management reporting.
	No	Factors	Why Material	Managing Materiality
	11	Customer Privacy	It is important to build customer trust and loyalty.	To establish Personal Data Protection Policy & Procedure and created awareness among employees on the PDP requirements using a video show.
	12	Business Model	It is important to establish a strong business model as it plays a vital role in challenging market conditions. A strong business model is deemed as core to the company's strategy.	To engage high-level review on the business model with the directors and senior management.
	13	Networking / Stakeholder	It is important to have new opportunities and positive influence.	To be active in networking with all parties in order to reconcile the process.
Very Important	14	Product Mix	To have a variety of products that will fit each customer's needs.	In order to be highly competitive to create products to cater variety of customers' segments.
Very In	15	Business Ethics/Code	Maintaining business ethics is our core values.	To proactively promote and positively reinforce good behaviours to the employees.
	16	Anti-Bribery & Anti- Corruption/AMLA	This reduces risks of economic imbalance and compliance with laws, international charters and conventions.	To conduct on-going monitoring, briefing and review of compliance throughout the Group are carried out to make sure that the company's policies and procedures as well as system of internal controls are being properly implemented.
				To organise Annual training on AMLA, Anti-bribery & Anti-Corruption for staff and agents.
	17	Social Media	The use of social media boosts visibility among potential customers and improves awareness about our brand.	To engage social media to promote our service and product.
	18	Political Stability	It has a wide impact on the economy.	To always work with the government of the day.

19 Safety Impact on safety of workforce to avoid health and safety related challenges.	To support the on-going training of operational teams to ensure understanding in recognising and improving as well as maintaining safe working conditions
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3. Our Stakeholders Engagement

Interaction involves a large number of different stakeholder groups and this kind of engagement is important to ensure we can identify, prioritize and address material matters and be adopted in our business strategies. The business and functional units are empowered to interact with their respective stakeholders on their chosen platforms. All issues raised by stakeholders are brought to the attention of the management or management meetings by the respective business and functional units. On-going engagements where applicable are carried out on a regular basis as they are integral to our business development, relationships with stakeholders and commitment to sustainability.

Our key stakeholders are outlined on the below table, along with the forms of engagement and key topics of interest that we seek to address.

Stake Holder Group	Engagement Approach	Engagement Focus & Objectives
Customers	 Customer service and contact centre Online trading platform Market research talk campaigns Road shows and market talks Research articles Buyers and tenants liaison 	 Customer Loyalty Customers feeling appreciation Branding and service provider Buyers and tenants feedback Progress meeting, updates and progress reports Customer relationship management Personalised customer service Promote E-game & Trading Stimulation Investment advice to clients
Employees	 Employees appraisal Other employee engagement (such as annual dinner, festive celebrations, outdoor sports and volunteering work) Career development and progression Fire drill & AMLA Training Knowledge & skills sharing opportunities 	 Bonding and engagement Hearing out from employees Job assurance and progression Performance evaluation and appraisal Career progression, employee development needs Training and attachment programmes

Stake Holder Group	Engagement Approach	Engagement Focus & Objectives
Business Partners	 Transparent tender process for procurement Supplier evaluations and selection Follows set regulations – construction/building management Design discussions & project input are valued. Prudent check & uphold quality assurance. Code of Ethics Financing equity funding Contracts & Agreements on Anti Corruptions & Bribery Clauses 	 Supplier assessment review Integrity pledge Fairness and business ethics Regular engagement with suppliers and subcontractors to understand their needs To understand remisier's need One-to-one engagement Code of conduct and business ethics Procurement process and practices
Regulators and Government Authorities	 Participation in regulators & government events Submission & approval matters with local authorities, town council, utilities & certification bodies Liaising with Government ministry & town planners Compliance with Bursa Malaysia & SC, and other governmental regulations where relevant (i.e. PDPA, EIS, etc.). Policies & Procedures 	 Continuous relationship and get latest updates Comply with all requirements Preparations of relevant documents Direct consultation Constructive feedback Opportunity to get directors involvement when deal concluded Kept up to date of new regulations via close rapport
Community	 CSR programmes Sporting events Sponsorship and donation Road show tie-in with Equities products projects developed Staff recreational and team building events Long service awards 	 Community engagement and support Bonding and branding Sponsorship and donations Corporate social investment programmes
Media	 Media interviews Online and offline campaigns Advertising Press releases and conferences Immediate notification of financial releases and material developments Timely and transparent communication Analysts comment and reports quoted by the media 	 Awareness and publicity Branding Engagement with public Research report on media on coverage of stocks New developments and updates for public knowledge and awareness Press release and media Coverage Continuous and meaningful communications Events

Stake Holder Group	Engagement Approach	Engagement Focus & Objectives
Economic Shareholders & Investment Community	 Annual General Meeting (AGM) Market and business performance outlook and strategies talk Analyst briefing on stock market Financial result announcement 	 Proactively engage with the investment community through multiple channels such as: Statutory Announcements Annual General Meetings Corporate Events Website Conferences
General Public	 Responsible corporate governance Good community role model 	Company websiteLocal recognition as a strong contributor
Skill Development	 Engagement with Universities Training and education Internships Sustainable engagement Continuous learning process Employee engagement in interbroker activities 	 Tapping talents from fresh grads Hands-on training and experience Identify extra talents & skillset possessed Continuous training to improve the competency of employees

4. Prioritization of Material Sustainability Matters

The Group shall undertake a stakeholder prioritization and engagement process to engage with stakeholders. These include on-going efforts to engage with stakeholders in the usual course of business through the day-to-day operations, as well as specific engagements carried out to seek stakeholders' feedback. The outcome of these engagements was considered in the course of the Group's materiality assessment.

As part of the process in conducting the materiality assessment of sustainability matters, the Group shall conduct specific engagement process as follows:

- To determine the key stakeholders with whom the Group should engage, the Group carried out assessments to identify key stakeholders based on each stakeholder's influence and dependence on the Group.
- To gain an insight into these key stakeholders' concerns, interests and expectations, the Group conducted discussions including on-going sessions throughout the year to gauge stakeholders' concerns pertaining to the list of sustainability matters identified.
- Where applicable, we shall take into account feedbacks from other stakeholder groups, gathered through various channels and through the on-going engagements during the

course of conducting its business operations.

5. Process Review

The materiality process is undertaken as a key component of the Group journey towards identifying the material sustainability matters. The management shall conduct review and approve the processes and outcome of the materiality process including the Group's materiality which guides the Group in addressing and managing material sustainability matters in the business operations.

The areas to explore by the CSC and the Board regarding ESS factors shall include the following matters:

1. ECONOMIC

Economic scenario remains as our core element based on the market condition of the global influence. The Group shall take a great level of measures to identify the critical risk which influence the strategy of the Group. By taking indispensable steps with the senior management and the board, we foresee to mitigate the risk elements. We also conduct periodic monthly and ad-hoc meetings with the Head of Group Departments on the business aspects to cater the market needs.

Some of our key policies and terms of references that guide our operations are as follows:

- Board Charter
- Terms of References of the Board Committees
- Code of Conduct & Ethics
- Whistleblowing Policy
- Corporate Governance Overview & Statement
- Anti-Bribery & Anti-Corruption Policies and Procedures
- Sustainability Policy
- Group Risk Management Policy & Procedures
- Human Resources & Administration Policy
- Personal Data Protection Policies & Procedures
- Remuneration Policies & Procedures
- Related Party Transactions
- Corporate Finance Operations and Compliance Manual
- Operations Manual

2. ENVIRONMENTAL

The Group's nature of operation does not have significant impact on the environment, however we consider the direct and indirect impacts of our business on the environment and manage our ecological footprint as we grow. As a responsible company, we operate with strong respect for our environment and enforced several operational measures to ensure that we operate in

an environmental amicable manner.

The Group shall continue to develop effective environment initiatives to protect the environment and promote environmental awareness amongst our employees, customers and other stakeholders.

The Group shall encourage all its employees to conserve electricity and we also promote ecofriendly practices in the workplace such as installed energy saving light bulbs in our office, promote e-statements, e-contract note, reduce usage of cheques, paperless environment and recycling papers in the work place to reduce the use of paper for communication purposes both internally and externally which indirectly reduces the logging of trees.

Water Management & Consumption

We shall promote the water saving practices among employees and adopting water-efficient practices and equipment wherever possible such as:

- Slow the flow. Adjusting water pressure/outflow for toilets, wash basins, pantry, throughout our office building.
- Seek the Leak. Conducting checks and fixing leaks immediately, where possible.

The water usage consumed by the Group shall be disclosed together with an explanatory note on why consumption increase or decrease year-on-year as follows.

Environment	FYE	FYE	FYE
	RM	RM	RM
Total Water Consumption			

The increase in the water consumption in [year] was due to major underground leakage near the main porch of the building. It was repaired amicably. We also performed maintenance works on cleaning the external building and carpet cleaning to set up a meeting room in the building during the year.

Electricity Management & Consumption

We understand that the energy management is essential for combating climate change and for lowering an organization's overall environmental footprint. We aim to minimize the energy usage by implementing, where practicable, the following efforts:

- A lighting schedule across key areas in our office to switch off lights during certain hours of least use.
- Maintenance and replacement of electrical equipment and light fittings to maximize energy efficiency
- Educate the staff to switch off the lighting, water dispenser, air conditioning, or other electrical appliances in office and pantry when they are not required.

The electricity consumption by the Group shall be disclosed together with an explanatory note on why consumption increase or decrease year-on-year as follows.

Environment	FYE	FYE	FYE
	RM	RM	RM
Total Electricity Consumption			

Waste Management

The Group acknowledges that the environmental impact of paper usage is significant. The Group's approach to waste management is to avoid unnecessary paper consumption and waste generation, where possible and appropriate, in order to reduce the wastage. The Group shall always look at ways to reduce paper usage, so that less waste. Generally the Group should practise the following on the paper management:

- Reducing paper by encouraging avoiding printing and photocopying and emphasising on paperless and electronic mode. In addition to this, practise double sided printing or reduce the size to have the best economical usage of papers.
- Reusing by printing on the other side of the printed papers
- Recycle recycle the papers by having proper recycling bins

3. SOCIAL

The Importance of Community

The Group is committed to promote social responsibilities as an integral part of the Group whilst pursuing business growth to enhance shareholders and stakeholders value. The Board recognises that for long term sustainability, its strategic orientation will need to cater beyond the financial parameters.

We shall instil values for safety, quality, integrity, diversity, innovation and sustainability to shape our on-going commitment to corporate social responsibility and to challenge us to reach even higher to ensure we are a responsible corporate citizen, employer of choice, and a positive contributor to the economy.

A strong commitment to social responsibility can protect and enhance a Group's brand. As the word gets out about a company's good works, it can help create a positive working environment and attract desirable employee a strong commitment to corporate social responsibility programmes.

The Group's efforts in sustaining CSR responsibilities are as listed below:

OUR APPROACH

Workplace

The Group aspires to be the employer of choice, the basic ingredient to having the right staff for the right tasks at the right time with the maxim – a happy employee is indeed a productive employee – for our staff to retain the highest level of productivity.

The Group believes that employees are vital contributors to the long-term success of the Group. To achieve maximum productivity, the Group shall consider, amongst others:

- Providing a clear career path to all employees;
- Enhancing their skills and competencies through various training & development programmes, seminars, and workshops; and
- Providing all employees with better workplace.

Recognising the importance of a healthy and positive lifestyle, the Group shall promote sports and its CSR principles, the management shall cultivates teamwork as well as sense of belonging among employees including conducting teambuilding events and sports activities periodically.

Education & Individual Development

The Group shall promote training of its staff to become industry experts so as to provide the expertise in servicing our clients and also efficiently performing in the workplace.

The Group shall embark to focus on talent development by offering the employees learning opportunities through in-house as well as external training programmes.

The Group shall be committed to enhance best practices through training and providing relevant circulars/guidelines to employees to promote awareness on corporate governance and risks issues involving the industry and inculcate and adopt new measures to prevent fraudulent practices.

Sports & Recreational Activities

In addition to encouraging continued participation, the Group shall develop programmes and projects in partnership with the community that promotes a series of benefits beyond the traditional aspirations of improved health and wellbeing.

As part of our culture and belief, sport and recreation can be a vehicle for positive social change. By participating in sport can improve the quality of life of individuals and communities, promote social inclusion, improve health, counter anti-social behaviour, raise individual self-esteem and confidence, and widen horizons.

We shall establish partnership with a range of organisations and agencies, to demonstrate the extent to which sports can contribute as well as to assist the organisations to achieve its objectives. We promote the following elements for the wellbeing of the individuals and community:

Community

The Group shall constantly and consciously address Corporate Social Responsibility (CSR), which is deemed an extension of the spirit of good corporate governance. We shall pursue CSR based on three principles as follows:

- Responsibility, Transparency and Accountability;
- Care and Unity;
- Value Creation and Enhancement for All

We shall make concerted efforts in channelling direct help to address our community's needs are done through the Group's management. The Group shall give back to the community through various CSR initiatives.

The Group shall continuously encourage people who may not have the resources to make monetary contributions or the time and skills to be involved in voluntary programmes, to make a difference. The Group's contribution to the society shall be included in the Annual Report.

Safe Workplace Practices

As a responsible corporation, we respect the interests of our stakeholders, our shareholders, employees, customers, suppliers, teaming partners, and the wider community and we actively seek out opportunities both to improve the environment and to contribute to the well-being of the communities in which we do business.

The Group shall place emphasis on safety and health aspects of its employees while maintaining a comfortable and conducive work environment through the some initiatives.

The Group shall emphasis on a workplace that is free from theft, violence, harassment, intimidation and other unsafe and disruptive influences due to internal and external conditions.