SUSTAINABILITY AT TM

Our sustainability journey has significantly evolved over the years but it remains as an essential part in the way we do our business.
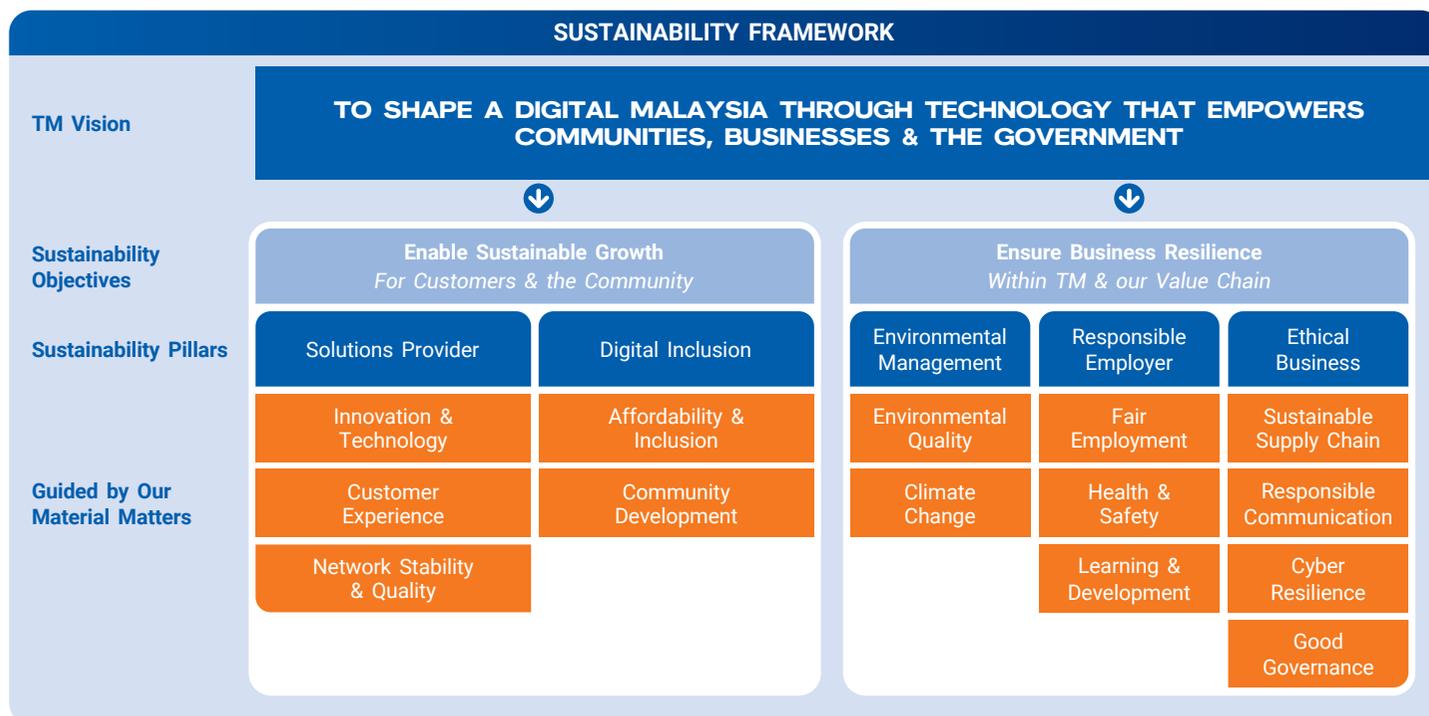
At TM, we are guided by clear strategies, framework and policies as we integrate sustainability into our core operations, ensuring that our growth delivers long-term value for our stakeholders – driving a greener, smarter and more inclusive Digital Malaysia.

This year, our report's structure is focused on aligning with the four (4) pillars of IFRS: Governance, Strategy & Approach, Risks & Opportunities and Metrics & Targets.

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TM'S SUSTAINABILITY FRAMEWORK

Our Sustainability Framework serves as a strategic blueprint that guides our efforts to achieve two (2) key sustainability objectives – enabling sustainable growth and ensuring business resilience.

To drive meaningful impact, the Framework is built upon five (5) sustainability pillars that align with our vision to build a Digital Malaysia – ensuring our initiatives create lasting value for all our stakeholders. They are: Solutions Provider, Digital Inclusion, Environmental Management, Responsible Employer and Ethical Business.

SUSTAINABILITY FRAMEWORK

TM Vision	**TO SHAPE A DIGITAL MALAYSIA THROUGH TECHNOLOGY THAT EMPOWERS COMMUNITIES, BUSINESSES & THE GOVERNMENT**			
Sustainability Objectives	**Enable Sustainable Growth** *For Customers & the Community*		**Ensure Business Resilience** *Within TM & our Value Chain*	
Sustainability Pillars	Solutions Provider	Digital Inclusion	Environmental Management · Responsible Employer · Ethical Business	
Guided by Our Material Matters	Innovation & Technology · Customer Experience · Network Stability & Quality	Affordability & Inclusion · Community Development	Environmental Quality · Climate Change	Fair Employment · Health & Safety · Learning & Development	Sustainable Supply Chain · Responsible Communication · Cyber Resilience · Good Governance

Our sustainability pillars are explained below:

SOLUTIONS PROVIDER

We deliver digital solutions, high-quality network connectivity, complemented by excellent customer experience to help customers achieve their sustainability goals.

DIGITAL INCLUSION

We strive to close the digital gap and promote digital inclusivity within the communities by providing everyone access to high-speed connectivity, so they are able to enjoy benefits of digital technologies.

ENVIRONMENTAL MANAGEMENT

We manage our environmental impacts and resources with mitigation strategies.

RESPONSIBLE EMPLOYER

We highlight our commitment towards the health & safety of our people, fair employment as well as prioritise the personal and professional development of our *Warga TM*.

ETHICAL BUSINESS

We establish trust with stakeholders by actively embracing and enforcing ethical business practices encompassing areas of procurement, cyber resilience, responsible communication and overall good governance.

(IR) Our material matters that govern our sustainability pillars are further elaborated from pages 46 to 51.

RAISING THE BAR IN 2024

As sustainability expectations rise and evolve, TM continues to strengthen its ESG strategy, ensuring we remain at the forefront of global best practices. In 2024, we enhanced our disclosures, improved ESG performance and deepened accountability — driving measurable impact and long-term resilience.

Sustainability Integration Plan

TM's three (3)-year Sustainability Integration Plan (2024-2026) aims to integrate sustainability into every aspect of our business. This structured roadmap ensures that each pillar within our Sustainability Framework is systematically integrated to advance our key sustainability objectives.

In our first year, we have made strong strides with the integration plan, with some elements fully embedded while others are progressing through foundational stages. Moving forward, we will build on this momentum, accelerating impact and deepening integration in key focus areas.

SUSTAINABILITY AT TM

Objectives	Sustainability Pillars	Material Matters	2024	2025	2026
Enable Sustainable Growth for Customers & the Community	Solutions Provider	M1	Building the Foundation	Early Integration	Advanced Integration
		M2	Advanced Integration	Fully Integrated	Fully Integrated
		M3	Advanced Integration	Fully Integrated	Fully Integrated
	Digital Inclusion	M4	Building the Foundation	Early Integration	Advanced Integration
		M5	Early Integration	Advanced Integration	Fully Integrated
Ensure Business Resilience within TM & Our Value Chain	Environmental Management	M6	Building the Foundation	Early Integration	Scaling Up
		M7	Building the Foundation	Early Integration	Scaling Up
	Responsible Employer	M8	Early Integration	Scaling Up	Advanced Integration
		M9	Scaling Up	Advanced Integration	Fully Integrated
		M10	Advanced Integration	Fully Integrated	Fully Integrated
	Ethical Business	M11	Early Integration	Scaling Up	Advanced Integration
		M12	Early Integration	Scaling Up	Advanced Integration
		M13	Scaling Up	Advanced Integration	Fully Integrated
		M14	Advanced Integration	Fully Integrated	Fully Integrated

Legend:

Stage	Integration Efforts
Building the Foundation	• Refine our baselines and target-setting
Early Integration	• Institutionalise and integrate sustainability into policies and processes • Integrate sustainability metrics into the KPIs of relevant members of top management
Scaling Up/ Expansion of Integration	• Build relevant sustainability competencies across various levels of employees and external stakeholders • Improve the breadth and depth of sustainability-related data
Advanced Integration	• Integrate relevant sustainability metrics into KPIs among a wider group of employees • Enhance the scope of disclosures
Fully Integrated	• Fully integrate relevant sustainability metrics into policies, processes and KPIs across various levels of employees • Advanced disclosure of sustainability metrics

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Sustainability-Related Policies

To institutionalise sustainability practices across our operations, we introduced six (6) new policies to complement our existing framework. These policies are applicable to all TM employees, activities and business operations, providing a consistent standard of conduct.

New Policies Introduced

TM Sustainability Policy

Provides guidance on conducting business responsibly while creating long-term value for stakeholders and affirms the strategic importance of sustainability.

Sustainable Supply Chain Policy

Demonstrates our commitment to establishing a sustainable supply chain, by setting TM's expectation of suppliers across all procurement transactions, emphasising adherence to internationally-recognised procurement standards.

Data Privacy and Protection Policy

Provides guidelines for processing personal data, including collection, use, storage, security and disclosure, to ensure compliance with the Personal Data Protection Act (PDPA) 2010. Our Privacy Notice Infographics were published in 2024 to provide the public with easy reference.

Environmental Management Policy

Provides and integrates broader climate and environmental considerations into TM's business practices.

Cyber Security Statement

Demonstrates TM's cyber resilience efforts through strong governance, robust security measures, supply chain management, global standards compliance and employee training.

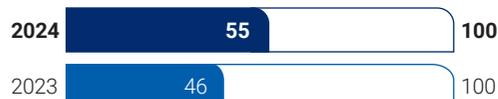### Stakeholder Engagement Statement

Outlines TM's commitment to engaging with stakeholders in a transparent, inclusive and responsible manner, consistent with TM's core values and CBE.

For more information about TM's full list of policies and guidelines, please refer to tm.com.my/sustainability/policies-guidelines.

ESG Ratings

Our continuous efforts throughout the year were reflected in improved ratings across key benchmarks including:

S&P Global CSA

2024	55	100
2023	46	100

MSCI

	CCC	B	BB	BBB	A	AA	AAA
2024	CCC	B	BB	BBB	**A**	AA	AAA
2023	CCC	B	BB	BBB	A	AA	AAA

Our S&P Global CSA score has been gradually improved (2022: 41/100) reflecting our continuous efforts in sustainability.

*The **S&P Global CSA** assesses companies' ESG performance, guiding sustainability improvements and transparency. It influences inclusion in the Dow Jones Sustainability Index (DJSI) and helps investors make informed decisions.*

***MSCI ESG Ratings** evaluate companies' ESG performance, guiding investors in sustainable decision-making.*

Alignment with Global Standards

With the NSRF announced on 23 September 2024, TM has taken a proactive approach to ensure that we are fully prepared for its full adoption by 2027. By embedding IFRS-aligned best practices, progressively, we continue to improve the link between sustainability, financial performance and risk management — ensuring ESG considerations are fully integrated into business decision-making.

This year, we aligned our report with four (4) pillars of IFRS:

Governance	Strategy & Approach	Risks & Opportunities	Metrics & Targets
Strengthening oversight through robust governance structures, policies and controls to monitor and manage sustainability and climate-related risks.	Embedding sustainability into business strategy to drive long-term value creation while addressing sustainability risks and opportunities.	Identifying, assessing and prioritising sustainability and climate-related risks and opportunities to enhance resilience and mitigate potential disruptions.	Tracking and disclosing sustainability performance, ensuring measurable progress toward TM's sustainability and climate goals and regulatory commitments.

(IR) Each TM's sustainability pillar in this report is segmented into these four (4) pillars. For details on TM's group-wide sustainability governance, refer to page 199.

Enable Sustainable Growth for Customers & the Community

TM plays a fundamental role in utilising our advanced digital infrastructure, digital solutions and partnerships to build sustainable growth for not just our customers but all Malaysians. Aligned with our PWR 2030 aspiration, this sustainability objective is driven by our forward-thinking approach as a solutions provider and dedication to digital inclusion contributing to the well-being and socioeconomic betterment of all.

Sustainability Pillars:

Solutions Provider

Digital Inclusion

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SOLUTIONS PROVIDER

Our innovative and technology-based solutions deliver sustainable value that is tailored to the expectations of our customer's diverse and evolving needs. Our focus on providing stable, high-quality connectivity networks ensures a superior customer experience, while making their lives easier.

This chapter focuses on three (3) material matters: Innovation & Technology, Customer Experience and Network Stability & Quality.

M1 INNOVATION & TECHNOLOGY

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M2 CUSTOMER EXPERIENCE

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M3 NETWORK STABILITY & QUALITY

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

GOVERNANCE

Our robust governance underpins our ability to deliver innovative solutions to our diverse customers. Supported by collaborative governance and strategically-developed policies, we nurture innovation, ensure exceptional service quality and inspire trust among customers and stakeholders alike.

Roles & Responsibilities

Delivering impactful solutions requires cross-collaboration across key departments and business units. TM's integrated governance structure ensures that each unit contributes effectively, aligning technological innovation with customer needs and sustainability goals.

Cross-Collaboration Governance Structure for Solutions Provider

Key Enabler	LoBs	Technology Hubs & Incubators	Service Quality & Support
Group Network and Technology (GNT)	**B2C (Unifi), B2B (TM One & Credence) and C2C (TM Global)**	**TM One Innovation & 5G Labs, TM R&D, MMU and TM AI Foundry**	**Customer Experience**
Leads network excellence by investing in advanced technologies and implementing proactive strategies, ensuring top-tier network stability and quality for customers.	Delivers tailored solutions that meet Malaysia's connectivity needs. Each LoB is governed by its respective Operational Committee providing strategic direction on sustainability risks and opportunities.	Spearheads innovation through Intelligent Connectivity, Advanced Analytics, AI, IoT and Digital Platforms to help the Group and external businesses solve operational issues and co-create new solutions for domestic and global market.	Ensures seamless engagement with the customers in delivering superior service, while providing personalised and proactive support for our customers.

Policies & Frameworks

Network Stability & Quality	Innovation & Technology	Customer Experience
• TM Assurance Policies & Guidelines • TM BCM • DRP & Business Process • MSQoS • ISO 9001: 2015 • TM Data Governance Policy & Framework • TM AI Governance Policy	• TM Business Initiative Governance Framework Policy • Product Creation Framework • TM Intellectual Property Manual • TM Procurement Level of Authority Policies • First-Tier Financial Limit of Authority (LoA) • TM Data Governance Policy & Framework • TM AI Governance Policy	• Digital Channel - General Handling Process • TM Assurance Policies & Guidelines • TM Complaints Process • TM BCM Framework • DRP & Business Process • MSQoS • TM Data Governance Policy & Framework • TM AI Governance Policy

SOLUTIONS PROVIDER

STRATEGY AND APPROACH

Our strategy focuses on delivering innovative, technology-driven solutions while ensuring seamless, high-quality connectivity for our customers. By continuously upgrading our digital infrastructure and adapting to evolving customer needs, we aim to empower businesses, communities and the Government for a sustainable digital future.

Strategic Approach as a Solutions Provider

Expanding Network Excellence	Intelligent Digital Solutions	Sustainable Product Innovation	Enhancing Customer Experience	Responsible Product Stewardship

Strategic Approach	What We Do
1. **Expanding Network Excellence**	• Deliver world-class connectivity by continuously expanding, modernising and upgrading network infrastructure through advanced technologies for broader coverage.
2. **Intelligent Digital Solutions**	• Provide intelligent and adaptive solutions that cater to the evolving needs of our customers by integrating AI into our offerings. • Deliver cloud services that offer scalable and secure platforms with shared resources for businesses to operate efficiently.
3. **Sustainable Product Innovation**	• Invest in R&D to develop products that meet high-performance standards while supporting environmental sustainability and climate resilience.
4. **Enhancing Customer Experience**	• Improve and enhance the overall customer experience by providing valuable and personalised experiences, such as the Ultra Experience, which offers exceptional service and exclusive benefits to high-value customers.
5. **Responsible Product Stewardship**	• Ensure TM's products meet the highest standards of quality, safety and sustainability. This includes circularity measures to minimise waste, responsible sourcing and stringent product assessments to uphold safety and compliance.

RISKS & OPPORTUNITIES

Our strategic aim is to remain agile and future-ready in the digital economy. We manage risks such as carbon emissions and product lifecycle waste by turning them into opportunities, such as diversifying revenue streams and leveraging data-driven insights.

Risk Category:

Risks	Strategic Approach
• **Carbon Emissions:** Expansion of data centres and Edge Facilities, coupled with resource-intensive AI applications and cloud solutions may increase Scope 2 and 3 emissions.	
• **Waste Management for Product Lifecycle:** Costs of waste handling, including circularity measures throughout the product lifecycle, require investments, accurate measurement and reporting.	

Opportunities	Strategic Approach
• **Diversify Revenue Streams:** Encouraging customer transition from analogue to digital expands current market presence and opens up new markets for our products and solutions.	
• **Increase Data-driven Efficiency:** Providing businesses and customers with digital tools and solutions such as 5G, AI and cloud services can encourage and enable sustainability practices.	
• **Cost Efficiency:** Efficient resource use and waste reduction can lower operational costs by minimising resource consumption and waste disposal expenses.	

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METRICS & TARGETS

Our innovative solutions are anchored on clearly defined goals and accurate impact measurements. By emphasising key metrics and continuous data collection, we enhance our solutions, fostering customers' trust while advancing our mission to connect Malaysia with the world and the world to Malaysia.

Note: These are highlights of key solutions and sustainable product innovation at TM in 2024 and the list is non-exhaustive.

Key Highlights & Milestones

Connecting Malaysia to the World and the World to Malaysia:

Type of Connectivity	2020	2021	2022	2023	2024	Five-Year Cumulative Growth*
Domestic fibre optic cables (km)	>600,000	>650,000	>690,000	>720,000	**>740,000**	23.3%
Connectivity of submarine cables (km)	>300,000	>320,000	>340,000	>340,000	**>275,000**	-8.3%**
Submarine cables (built and installed)	~30	30	32	35	**33**	10%**
Number of utilised high-speed broadband ports (million)	>2.7	>3.0	>3.5	>3.9	**>4.4**	62.9%
TM Internet Exchange (TMiX) Nodes	0	30	62	62	**62**	106.7%
PoPs	28	28	29	29	**29**	3.6%
Mobile Coverage (%)	79.2	82.6	83.2	95.4	**95.6**	20.7%

*   Five-year cumulative growth is calculated using 2024 data relative to 2020 data.
** Reduction due to retirement of FLAG and SMW3 submarine cables in 2023 and 2024 respectively. In line with our strategy, TM has commenced new cable investments and will continue to explore additional opportunities to support Malaysia's goal of becoming a regional hub.

Driving Innovation Through R&D

RM56.9 million
investment in cutting-edge R&D technologies to solve operational issues and co-create new solutions.

Customer Excellence

45 NPS
better than Ipsos Global Norm benchmark for broadband and telco industry.

SOLUTIONS PROVIDER

What We Did

EXPANDING NETWORK EXCELLENCE

1. Advancing Network Stability and Performance

We fortified our core infrastructure through continuous modernisation, expanded service offerings beyond connectivity, integrated AI-driven operations, enhanced process automation, establishing a more resilient and secure ecosystem.

Value Created in 2024:

➔ **Modernising Network Infrastructure:**

- Started **the migration for Metro-E** nodes to the NGT Network with a strategic roadmap to scale this initiative over the next five (5) years. The NGT architecture incorporates advanced technologies such as Segment Routing Traffic Engineering (SR-TE) and Software-Defined Networking (SDN) controllers, enabling the foundation for autonomous Self-X and Zero-X capabilities to enhance customer experience.

- **Upgraded OLTs** to a scalable, high-density equipment, enhancing network capacity and enabling higher bandwidth offerings. This initiative will continue over the next three (3) years, allowing broadband customers to enjoy better service performance and higher package FMC offerings.

➔ **Embedding Intelligence into Operations:**

- Deployed **six (6) AI-driven use cases** to enhance network intelligence and optimise operational efficiency. These implementations enable accelerated anomaly detection across multiple network domain, enhanced network visibility and proactive incident resolution, contributing to a superior customer experience.

- Boosted operational automation from **Autonomous Network (AN) Level 2 to Level 3**, enabling more complex solutions and automated responses to network issues. While automation helps to reduce downtime and human-related errors, AI-driven system predicts probable issues before they occurred. In addition, this transformation contributes to:
  – Optimised 36,784 hours for AHT.
  – Achieved >200 Minimum Viable Product (MVP) for automation solution.

- Enhanced solutions for **real-time proactive auto-monitoring and blocking on fraudulent voice traffic with zero cost**. This minimises the need for manual intervention, reducing operational costs while increasing productivity. Among the achievements are:
  – 75% cycle time reduction in handling fraudulent voice activity.
  – 86% task improvement using automation.
  – Average of 120,000 monthly scam call attempts blocked.

➔ **Expanding Digital Integration:**

- Published **43 network APIs** via the TM API Gateway, facilitating easier integration with partners and businesses for seamless digital solutions creation and collaboration.

➔ **Government Collaboration:**

- Partnered with the Government under **JENDELA**, delivering robust fibre connectivity to support the widespread adoption of current technologies, including 5G.

- Adhered to the MCMC's **MSQoS** for both wired and wireless broadband services.

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What We Did

EXPANDING NETWORK EXCELLENCE (CONTINUED)

2. Optimising Edge Facilities & Data Centre Efficiency

Upgraded the Edge Facilities in Seberang Jaya to meet rising demand from enterprise and government segments. By having data and compute service closer to end-users, it reduces latency and lowers operational risk. Optimisation of data centres and existing nodes has resulted in cost savings and reduced carbon emissions.

Value Created in 2024:

- Increase in new orders by 145% YoY for Seberang Jaya Edge Facilities.
- Achieved monthly cost savings of RM263,000 through two (2) data centres optimisation.

3. Advancing Telco Peer Collaboration

TM and other telecommunications providers are collaborating to enhance 4G coverage and service quality in key areas like hospitals, universities, stadiums, highways and tourist destinations. This initiative supports Malaysia's sustainable development goals by promoting digital inclusion, improving connectivity and boosting economic growth.

For 5G, mobile service providers, including TM, have been leveraging 5G infrastructure deployed by DNB through 5G MOCN arrangements. The deployment adopted a single wholesale 5G network approach before dual network approach was allowed in 2024.

Value Created in 2024:

- Established a 6-way 4G MOCN at five (5) locations. TM is hosting one (1) site at West Coast Expressway (WCE) Banting, Selangor.
- Managed to minimise environmental impact by reducing duplication of infrastructure.
- Equal opportunity in accessing 5G service.

SOLUTIONS PROVIDER

What We Did

INTELLIGENT DIGITAL SOLUTIONS

1. AI-Powered Traffic Management

Recognised by the UNCDF in 2024, the STARS was created in partnership with *Majlis Bandaraya Ipoh* (MBI) where we deployed AI-enabled sensors at key intersections. These sensors monitor average waiting times, detect vehicle movements and adjust traffic light durations based on real-time congestion.

Value Created in 2024:

➡ 6,290 $kgCO_2e$ emissions reduced monthly by minimising traffic idle time.

2. Revolutionising Customer Service with Conversational AI

Launched by TM One, our Conversational AI chatbot enhances customer engagement and operational efficiency across healthcare, retail and finance sectors. The solution uses advanced Machine Learning (ML) to handle voice, text and digital interactions, automating inquiries, appointment bookings and scheduling.

Value Created in 2024:

➡ Achieved 70% resolution of customer support inquiries through the chatbot, improving the overall effectiveness for Boon Siew Honda through seamless chatbot integration.

➡ Awarded a contract to provide Conversational AI to *Syarikat Air Melaka Berhad* to improve automated support.

3. Building AI-Ready Data Centres

In collaboration with Singtel's Nxera, TM Global is developing a hyper-connected, AI-ready data centre campus in Johor. Designed to serve hyperscalers, AI application providers and enterprises, this facility will power accelerated digitalisation and cloud adoption across the region.

Value Created in 2024:

➡ The campus is designed to meet LEED green building standards, ensuring sustainability and energy efficiency.

4. Carbon Reduction through Server Virtualisation

Migrated physical Business Process Outsourcing servers to virtual servers within our private cloud, significantly reducing energy consumption and carbon emissions.

Value Created in 2024:

➡ Reduction to 26 virtual servers from 137 on-premise servers, with savings on energy costs and 411,560 $kgCO_2e$/year reduction of carbon emissions.*

* Estimation based on energy consumption for on-premise servers and virtual servers, excluding other factors such as cooling mechanisms.

5. Enhancing Safety & Efficiency with Vision AI

TM One's Vision AI solution encompasses technologies and systems that allow computers to interpret, understand and analyse visual data, typically from images or videos. This solution was designed to replicate human vision and perception, extracting valuable insights from visual inputs. It includes capabilities such as Image Recognition, Object Detection and Image Classification.

Value Created in 2024:

➡ 25 surveillance cameras installed, including eight (8) with Vision AI capabilities in Kulai district, in partnership with *Majlis Perbandaran Kulai* (MPK).

➡ Completed Proof of Concept for Selangor State Government and *Majlis Perbandaran Subang Jaya* (MPSJ).

➡ Demonstrated Vision AI's capabilities at the national Smart Nation Showcase.

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What We Did

SUSTAINABLE PRODUCT INNOVATIONS

Solutions	What We Did
Centralised Access Management and Line Assessment (CAMELIA)	The smart analytic system leverages ML to diagnose, detect and predict network health and faults in TM's access networks, ensuring reliable connectivity and operational efficiency. The assurance process was streamlined from nine (9) to three (3) steps, reducing restoration time from 48 hours to within 24 hours. **Value Created in 2024:** ➔ More than RM11 million in cost avoidance from proactive network issue management within 12 months. ➔ 68% reduction in customer support calls per month. ➔ 98% accuracy in preventive maintenance verification. ➔ 98% diagnostic accuracy at the first level. ➔ Network restoration within 24 hours (NR24) improved from 38% to 80%.
TM Smart Vehicle Solution (CONVES)	The fleet management solution uses telematics and big data analytics to enhance fleet management by providing actionable insights for fleet operators and drivers, optimising performance and reducing environmental impact. **Value Created in 2024:** ➔ Speeding incidents have decreased by approximately 16.3% in 2024. ➔ CO_2 emissions per vehicle per year have reduced to 16.03 kg in December 2024 from 20.40 kg in January 2024.

SOLUTIONS PROVIDER

What We Did

ENHANCING CUSTOMER EXPERIENCE

1. Ultra Experience for B2C High-Value Customers

Introduced the Ultra Experience for high-value customers, offering tailored services for seamless connectivity and personalised support.

Key Offerings:

- Next-Day Installation: Priority service with guaranteed capacity for timely installations.
- Unifi Elite Crew: Proactive maintenance, scheduled home visits and on-demand in-home support beyond fibre connectivity.
- Unifi Premier Care Crew: Dedicated relationship managers offering tailored support, quick issue resolution and exclusive access to promotions and product updates.

Value Created in 2024:

- 91% of high-value customers' orders fulfilled within the next day.
- Contributed towards maintaining NPS of 45.

2. Strengthening Customer Relationships

TM continuously tracks and refines customer experience through key performance metrics, covering customer handling, network performance and system/application functionality. Monthly monitoring ensures critical issues are swiftly identified, addressed and resolved to enhance customer satisfaction.

Value Created in 2024:

Customer Satisfaction	2023	2024
NPS	46	**45**

Reduction in Complaints	2023	2024
Complaint Index	6.9	**6.6**
Reduction in Complaints	33.3%	**21%**

Fewer Service Faults	2023	2024
Reduction in Service Faults (Quality)	5%	**13%**

3. Resolving Top Customer Issues

We continued to tackle the top customer pain points with proactive solutions, ensuring improved customer satisfaction and service reliability.

Value Created in 2024:

Customer Concerns	Mitigative Action	Result
Fault issues due to service failure and quality issues	Proactive network performance monitoring and Customer Premise Equipment (CPE) replacement	⬇ **Service failure-related faults**
Enquiries related to product promotion and packages, application status, billing and report status	Enhanced myunifi app self-service features and provided regular digital updates	⬆ **App adoption among customers**
Account issues due to payment method, billing profile, account authentication and modification	Ensured myunifi app compatibility with diverse devices and platform	⬇ **Account maintenance issues**

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Case Study: Staying Accountable to Delivering Exceptional Customer Service

Despite our continuous efforts to provide exceptional customer service, we fell short of meeting the MSQoS for Response Time for Operator Service in Q1 2024. The standard requires at least 85% of customer hotline calls requesting a human operator to be answered within 30 seconds. While we take our commitment to customers seriously, the shortfall was due to a combination of factors:

- High incidents of network outages due to cable theft, vandalism, accident involving TM cables and poles.
- Flood, fire and civil work by third party incidents.

Our Response

We acted swiftly with a comprehensive recovery plan to prevent future occurrences and rebuild customer trust:

Early Alerts: Proactive performance monitoring and customer notifications to manage expectations.	**Automated Recovery:** Auto-rebooted Residential Gateway (RG) and Optical Network Unit (ONU), reducing downtime.	**Network Improvements:** Infrastructure upgrades led to reduction in Service Request faults from Q1 to Q4 2024.
Process Automation: RPA deployed at Unifi Contact Centre for faster issue resolution.	**Optimised Resources:** Improved staffing strategies for peak periods.	**Customer Empowerment:** Promoted self-service channels for efficient support.

What We Did

RESPONSIBLE PRODUCT STEWARDSHIP

1. **Driving Sustainable E-Waste Management**

   TM One remains committed to a greener future by implementing responsible e-waste disposal practices. Its Business Technology Division ensures secure retirement and disposal of IT equipment, including servers, routers and switches, through stringent asset management processes.
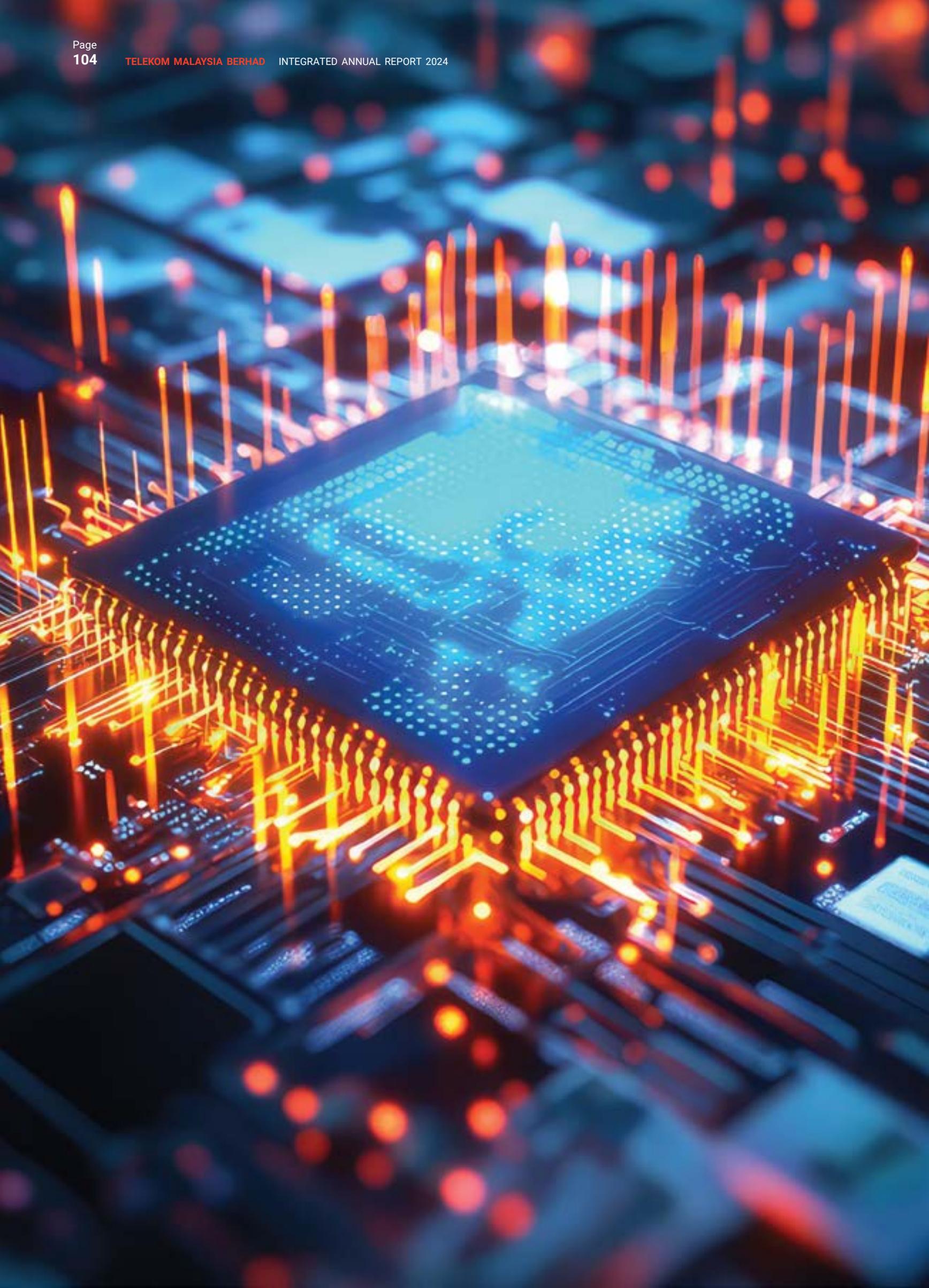
   Value Created in 2024:

   Since 2021, we have cumulatively recorded that:

   - 20.97 metric tonnes of e-waste were diverted from landfills.
   - 22,437.9 kgCO$_2$e emissions were prevented through responsible disposal.
   - TM was awarded Climate Champion at the Malaysia ESG E-Waste Contribution 2024 for leadership in sustainable e-waste management.

CALL TO ACTION

TM will continue advancing network quality and resilience by investing in next gen technologies and intelligent infrastructure to meet evolving customer demands. We remain committed to collaborating with partners and customers to deliver innovative, sustainable solutions that support their decarbonisation and digital transformation, driving Malaysia's transition to a sustainable digital economy.

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DIGITAL INCLUSION

A Digital Malaysia is an aspiration that ensures technology is inclusive, accessible and affordable to all. As a key enabler of the nation's digital transformation, digital inclusion at TM is essential in enabling all Malaysians to participate in the digital economy and improve their quality of life.

We remain dedicated to bridging the digital divide, educating and empowering communities with essential digital skills through community engagement initiatives. This means breaking down barriers to connectivity and digital tools and addressing a social gap to ensure that everyone, regardless of their background, can thrive in a digital world.

This chapter focuses on two (2) material matters: Affordability & Inclusion and Community Development.

M4 AFFORDABILITY & INCLUSION

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M5 COMMUNITY DEVELOPMENT

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

GOVERNANCE

Effective and robust governance ensures a structured and accountable approach to advancing digital inclusion. Through clear roles, policies and strategic initiatives, we drive connectivity, digital literacy and equitable access.

Roles & Responsibilities

Digital inclusion is a collective responsibility that requires action across the Group. To ensure accountability within Digital Inclusion, we have established clear roles and responsibilities across key departments, ensuring alignment and effective collaboration to implement our initiatives:

Collective Responsibilities in Digital Inclusion

TM ONE

Leads collaborations with the Government and MCMC on digital infrastructure projects that enhance digital literacy and access, including:
- Fibre Optic Point-of-Presence Network Hub (POP 1 & POP 2)
- National Information Dissemination Centre (NADI)

unifi

Provides equitable broadband and mobile packages that are affordable and accessible, supporting universal digital access for all levels of society.

Yayasan TM

A social impact arm, focusing on Education, Community and Nation-Building and the preservation of Art, Culture and Heritage.

MMU MULTIMEDIA UNIVERSITY

A tertiary education arm, cultivating future-ready digital talent. In 2024, MMU formed a Sustainable Development Committee, uniting all faculties to champion sustainability and inclusivity, chaired by the Director of Strategy and Quality Assurance and co-chaired by the Vice President, Student Experience and Entrepreneurship Development.

YUM YAYASAN UNIVERSITI MULTIMEDIA

A foundation established under MMU with funding received from corporate organisations and individuals in the forms of donation, *zakat, waqaf* and endowment, providing scholarships, financial assistance and community aid to deserving recipients.

TM Learning and Development (TM L&D)

Provides cutting-edge training programmes on emerging technologies, developing a digitally-skilled workforce not only internally but also within the community via TVET education, meeting the demands of the evolving digital landscape.

DIGITAL INCLUSION

Policies & Frameworks

Affordability & Inclusion	Community Development
• TM Business Initiative Governance Framework Policy • Product Creation Framework • TM Procurement LoA Policies	• TM Group Communication Policy – Corporate Responsibility & Donations Administration • YTM Trust Deeds & Supplementary Policy • Multimedia University Sustainability Policies • Human Resource Policy: Learning and Development • YUM Trust Deeds

(IR) For more information, please refer to the Sustainability Governance section on page 199.

STRATEGY AND APPROACH

Championing digital inclusion is central to TM's sustainability commitments, with the PWR 2030 strategy focused on unlocking the transformative potential of digital technologies. This includes fostering digital literacy and nurturing a culture of innovation, making sure that no one is left behind.

Under our Digital Inclusion pillar, we aim to **deliver meaningful connectivity** by providing affordable, reliable high-speed internet, equipping Malaysians with the skills to navigate the digital world and fostering trust in digital safety and security.

Advancing our digital solutions, we support Malaysia's nation-building agenda through community development programmes, including educational equity initiatives, digital training for micro-entrepreneurs and humanitarian aid during disasters, empowering communities nationwide.

Strategic Approach for Digital Inclusion

Reachability and Accessibility	Affordability	Education and Capability Building	Safe and Secure Digital Space	Community Development for Nation-Building

Strategic Approach	What We Do
1. Reachability and Accessibility	• Connect Malaysians with reliable connectivity, regardless of location and background, enabling them to participate in the digital economy and to improve their quality of life. • Ensure our products can be used by everyone, regardless of their abilities, creating a more inclusive society.
2. Affordability	• Offer a range of plans and packages that cater to different economic needs, making it possible for everyone to stay connected by removing financial barriers and providing cost-effective solutions.
3. Education and Capability Building	• Improve quality of life through access to digital tools and knowledge with scholarships, training programmes and resources. • Empower entrepreneurs with access to marketing tools, resources, training and financial services for micro and small entrepreneurs to expand their customer base and increase their income.
4. Safe and Secure Digital Space	• Provide awareness against harms, such as scams and frauds in digital spaces. • Create a safe digital space to protect internet users from harm, build trust and contribute to a safer online community. (IR) For more information, please refer to our cyber resilience programmes on pages 160 to 161.
5. Community Development for Nation-Building	• Support various projects in education, humanitarian aid and disaster relief that address social, economic and environmental challenges. • Contribute to the overall well-being and progress of the nation, ensuring that our efforts to bridge the digital divide are holistic and far-reaching.

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RISKS & OPPORTUNITIES

Our strategic goals keep us accountable as we run into unexpected challenges or stumble upon the right set of circumstances. From delivering connectivity in rural spaces to empowering small business owners and developing community as part of our nation-building efforts, we are determined to manage these strategic aims associated with bridging the digital divide.

Risk Category:

Risks	Strategic Approach
• **Economic Disparities from Digital Divide:** Limited access to digital technology in underserved areas restricts TM's ability to expand connectivity solutions, hindering national digital aspirations and slowing adoption of TM's products and services.	
• **Inequality in Education and Employment:** A lack of access to digital tools and knowledge reduces the talent pipeline available to TM and its business customers, impacting workforce readiness and the country's ability to compete in a digital economy.	
• **Cyber Safety Concerns:** Distrust of digital technologies, particularly among vulnerable groups like senior citizens, can hinder adoption of TM solutions and widen the divide in digital participation.	
• **Global Competitiveness at Risk:** Without widespread digital access, Malaysia may struggle to foster innovation and sustain a high-skilled digital workforce, impacting TM's role in supporting a future-ready nation.	
• **Inability to Gain Market Share:** Gaps in digital infrastructure in rural areas limit TM's ability to expand its customer base, reducing potential revenue growth and hampering TM's reach in high-impact segments.	

Opportunities	Strategic Approach
• **Access to Underserved Markets:** By bridging the digital divide, TM can expand its infrastructure and reach into rural and low-income areas, tapping into new customer bases and creating additional revenue streams.	
• **Fostering Customer Loyalty:** Expanding digital access in emerging markets, such as rural townships builds brand trust and strengthens customer loyalty.	
• **Stimulating Local Innovation:** Equipping businesses and communities with digital tools and skills accelerates entrepreneurship, economic activity and demand for TM's services.	
• **Inclusive Design for All:** Incorporating universal design principles ensures TM's products and services are accessible to everyone, including persons with disabilities, fostering greater digital inclusivity.	

DIGITAL INCLUSION

METRICS & TARGETS

We effectively measure our progress in expanding digital access, enhancing connectivity and promoting digital literacy. This ensures accountability and continuous improvement in our efforts to bridge the digital divide.

Key Highlights

Progress Towards a Digital Nation (JENDELA)
- At the conclusion of JENDELA Phase 1 in 2022: TM has contributed **81%** of the total 7.7 million premises pass delivered.
- For JENDELA Phase 2 (2023 – 2025): TM has achieved **117%** of its annual JENDELA 2024 target.

Empowering Individuals and Entrepreneurs through TM-Managed NADI
- **117,595** individuals and entrepreneurs impacted through Smart Services initiatives at TM-managed NADI.

Accessibility for All Malaysians
- Introduced **house call assistance services** for PwD.

Education and Capability-Building
- **MMU Graduates:** 3,685 (44% female, 56% male)
- **Scholarships & Financial Aid:** RM35.5 million invested, benefiting 6,908 students.
- **Schools Connected:** More than 7,000 primary and secondary schools nationwide connected with high-speed broadband.

Contributions to Community Programmes
- **RM23.3 million** of infrastructure investments made and services supported* through Multimedia University's development
- **RM1.2 million** of corporate donations/community investments made including 17 not-for-profit organisations (NPOs) through YTM.

* Services supported refers to those provided for public benefit either through a direct payment of TM's operating costs or through staffing the facility or a service with TM's employees.

BRIDGING THE DIGITAL DIVIDE

In line with our commitment to improve mobile connectivity coverage and making it accessible for all Malaysians, TM has successfully completed its **6-Way MOCN Proof of Concept** site in Banting.

A collaborative effort with MCMC and leading MNOs, this initiative strengthens connectivity in underserved areas and critical zones like hospitals, universities and rural communities. This initiative supports Malaysia's sustainable development goals by promoting digital inclusion, improving connectivity and boosting economic growth.

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What We Did

REACHABILITY AND ACCESSIBILITY

1. Delivering Nationwide Connectivity

We are committed to ensuring that every Malaysian, regardless of location or background, has access to reliable, high-speed internet. Through continuous network expansion and infrastructure improvements, we are closing the digital divide and supporting Malaysia's digital transformation and JENDELA initiative.

Value Created in 2024:
- At the conclusion of JENDELA Phase 1 in 2022: TM has contributed 81% of the total 7.7 million premises pass delivered.
- For JENDELA Phase 2 (2023 − 2025): TM has achieved 117% of its annual JENDELA 2024 target.

2. Digital Accessibility for All

To remove barriers to connectivity, Unifi introduced a house call assistance service for PwD eliminating the need for physical visits to service centres.

Value Created in 2024:
- Enhanced customer experience for customers with additional needs, making Unifi services more accessible to individuals.
- Received encouraging response from this initiative, which is being made available for the second year of its implementation.

3. Empowering Education Through Connectivity

As an appointed connectivity provider by the Ministry of Education, we are ensuring that students and schools across the nation have access to reliable digital infrastructure.

Value Created in 2024:
- Connected more than 7,000 primary and secondary schools nationwide.

4. Driving Digital Empowerment in Rural Communities

We expanded the NADI programme, in collaboration with MCMC, to empower rural and urban poor communities with ICT-based education, entrepreneurship training and internet access.

Value Created in 2024:
- Increased TM-managed NADI centres from 483 to 507 (5% increase from 2023) out of 1,099 nationwide.

5. Transforming Rural Connectivity with Fibre Optics

Through the Fibre Optic POP Network Hub projects (POP 1 and POP 2), in collaboration with the Ministry of Communication, we are enhancing internet quality by upgrading from copper to fibre optics in rural areas, benefiting schools, homes, businesses and industrial zones.

Value Created in 2024, as of December 2024:
- More than 42,000 people benefitted, with over 19,000 adopting the upgraded services.
- Since its commencement in 2022, 233 POP 1 and 129 POP 2 sites were commissioned.
- Ahead in POP 2 rollout progress, where 63 sites with 368.5 km fibre optics were further deployed.

DIGITAL INCLUSION

What We Did

AFFORDABILITY

1. **Affordable Connectivity for All**

   To ensure equitable access to digital services, we introduced affordable broadband solutions tailored for diverse income groups. Our continued efforts include the following packages, designed to make high-speed internet more affordable for all Malaysians:

   - **UNI5G WOW Prepaid Plan:** Starting at RM10, offering 10GB of 5G and 4G LTE data with a 30-day validity, making mobile broadband affordable and flexible.
   - **Fixed Broadband Plan:** 100Mbps high-speed broadband with uncapped quota from RM89, ensuring reliable and seamless connectivity for households.
   - **UNI5G Postpaid Device Package:** Starting at RM69, these bundles include free devices, providing cost-effective solutions for comprehensive digital access.

EDUCATION AND CAPABILITY BUILDING

1. **Breaking Barriers to Education**

   We invested in educational opportunities to uplift deserving B40 low-income groups and marginalised communities through scholarships and financial assistance provided by YTM, MMU and YUM.

   Value Created in 2024:
   - RM35.5 million invested in scholarships and financial assistance, benefiting 6,908 students, fostering inclusive education.

   (IR) For more details on MMU, please refer to pages 86 to 89.

2. **Nurturing Future-Ready Digital Leaders**

   Our flagship TM Future Skills Programme is designed to equip underserved youth with digital literacy and IR4.0-centric skills.

   Key Initiatives in 2024:
   - Conducted the TM Future Skills Certification Programme across nine (9) states nationwide.
   - Provided technology and digital equipment at three (3) Champion Schools' Digital Hub to inculcate students' interest in STEM
   - Hosted the Tech Titans Challenge, a three-day digital innovation camp to produce innovation and harness talents among school students.

   Value Created in 2024:
   - 1,288 teachers and 13,313 students empowered with future-ready skills.

3. **Boosting Employability through Technical Excellence**

   The YTM's Technical and Vocational Education and Training (TVET) Madani @POLYCC programme strengthens technical and vocational education by developing cutting-edge digital and fibre network technology expert.

   Value Created in 2024:
   - 402 students and 96 lecturers trained across four (4) TVET institutions.
   - Invested RM1.2 million to date, enhancing graduates' industry-ready skills.

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What We Did

EDUCATION AND CAPABILITY BUILDING (CONTINUED)

4. Enhancing NADI to Build Digital-Ready Communities

In partnership with MCMC, since July 2024, TM-managed NADI has been transformed with an introduction to the new Smart Services initiative nationwide, setting high-performance targets for each service offered by NADI with a refreshed membership registration. NADI's Smart Services are driven by five (5) pillars:

Entrepreneur:	**Lifelong Learning:**	**Well-being:**	**Awareness:**	**Government Initiatives:**
Creating competitive and sustainable entrepreneurship.	Providing a platform for the underprivileged group and school leavers to gain education and skills.	Bridging knowledge on e-Health and well-being.	Self-regulation and awareness on the limitations of internet and social media usage.	Disseminate accurate information on the latest government initiatives.

Value Created in 2024:

- 569,808 total new registered members.
- 26,531 individuals impacted through education and skills development.
- 46,622 individuals impacted through Internet safety awareness programme.
- 3,316 micro entrepreneurs (75% women) empowered through entrepreneurship programmes.
- 38,403 individuals benefitted from health screening programme.

5. Digital Empowerment for MSMEs

The Unifi Business Club supports MSMEs by providing expert insights on business strategies and operational optimisation.

Value Created in 2024:

- 72 online resources shared for MSMEs self-development.
- Supported MSMEs through various programmes such as *Jelajah Saya Digital*, Go *Niaga* and *Jelajah* DMS.

DIGITAL INCLUSION

What We Did

COMMUNITY DEVELOPMENT FOR NATION-BUILDING

1. Disaster Resilience & Emergency Preparedness

TM, via YTM, actively contributes and supports disaster relief efforts for Malaysians. YTM works with GLC *Demi Rakyat dan Negara* (GDRN) and National Disaster Management Agency (NADMA) in responding to national emergencies like flood and natural disasters. In addition to this, YTM is also a joint-secretariat together with Yayasan Hasanah (Hasanah), the foundation of Khazanah Nasional Berhad for GDRN since 2015. Among our efforts in 2024:

Programme	What We Did
Disaster Response Collaboration	Strengthened disaster response capabilities through partnerships with government agencies and NGOs. **Value Created in 2024:** → 60 participants trained through the Intergovernmental and NGOs Disaster Response and Coordination Workshop for the State of Sabah (SACOORD 2024), equipping them with disaster management skills. → 89 participants trained and mobilised from *Rakan* NADMA Disaster Emergency Simulation Exercise (RANDEX) 2024. → 15 NGOs mobilised during *Monsun Timur Laut* 2024/2025.
Community Disaster Preparedness	Conducted Disaster Preparedness Programmes for disaster-prone communities in Kelantan and Pahang and launched the *Penyelesaian Berasaskan Alam* (NBS) – *Tabung Inovasi Bencana*, where proceeds from cucumber and sweet potato crops fund disaster relief efforts. **Value Created in 2024:** → 857 individuals, including 150 families trained in disaster preparedness.
Tsunami Preparedness	Conducted the Tsunami Preparedness Programme for community leaders and government agencies in Kudat, Sabah, ensuring a more coordinated and effective response to potential tsunami events. **Value Created in 2024:** → 46 leaders and government agency representatives trained.
Volunteer Capacity Building	Enhanced volunteer preparedness and response capabilities through *Program Latihan Asas Sukarelawan* 101 and Water Safety and Basic Rescue training. **Value Created in 2024:** → Trained 159 volunteers from UTM *Prihatin* and TM Reaching Out Volunteers (TM ROVers) in disaster response readiness. → 156 volunteers equipped with water safety and rescue skills.
Humanitarian Relief Support	Provided humanitarian support, including food, medical aid and essential non-food items to disaster-hit communities. **Value Created in 2024:** → A total of 22,082 individuals benefitted from the programme including 3,142 families. → 36 total volunteers contributed to 520 volunteering hours through TMROVers.
Connecting Lives During Crises	TM One, in collaboration with MCMC and NADMA, provided 1Gbps WiFi connectivity to flood evacuation centres, enabling real-time communication and efficient coordination, while ensuring everyone to stay connected. Introduced the Fixed and Mobile Content Convergence (FMCC) on Wheels, a collaborative project between TM's Network Intelligence Centre and Mobile Technology unit. This innovative solution transforms the way TM delivers connectivity, especially during critical situations, such as emergencies and natural disasters. **Value Created in 2024:** → Six (6) flood evacuation centres connected with Unifi Home or Unifi Air, benefitting more than 2,880 flood victims in Kelantan and Terengganu.

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What We Did
COMMUNITY DEVELOPMENT FOR NATION-BUILDING (CONTINUED)

2. Empowering Communities for Sustainable Growth

Programme	What We Did
Investing in Social Impact	Approximately RM1.5 million allocated for YTM Social Impact Grant, to empower organisations addressing digital literacy, education for underserved communities and socioeconomic development. **Value Created in 2024:** ➔ Seven (7) organisations are currently executing social impact projects funded by this grant targeting social inequalities, promoting inclusive growth.

3. Arts, Culture & Heritage

Programme	What We Did
Muzium Telekom	Promoted a variety of digital arts and cultural programmes to showcase local creative talents and preserve telecommunications heritage. **Value Created in 2024:** ➔ 18,894 visitors to Muzium Telekom and its on-site events. ➔ 1,164 visitors to the Digital Art Gallery.
Spreading Festive Cheer	*Program Cahaya Ramadan YTM* 2024 provided essential festive support for marginalised communities to join the celebration. **Value Created in 2024:** ➔ 4,450 individuals assisted through food baskets, cash contributions and festive items amounting to RM320,000 in total contributions.
Driving Sustainable Festivities through Eco-Initiatives	Our *Cabaran Eco Raya TM* initiative made festive celebrations more meaningful by combining sustainability and community support. Departments pledging greener practices earned the chance to donate to charity homes. **Value Created in 2024:** ➔ RM10,000 contributed to four (4) charity homes, promoting eco-friendly celebrations while supporting the less fortunate.

CALL TO ACTION

We aim to accelerate digital inclusion and bridging the digital divide through a more structured approach, ensuring our community outreach and development initiatives create meaningful impact towards Malaysia's digital economy. Looking ahead, we will focus on programmes that empower individuals to thrive in the digital economy, equipping them with the skills, tools and opportunities needed for sustainable growth and participation in a connected future.

Ensure Business Resilience within TM & Our Value Chain

At TM, we prioritise managing our environmental impact, the well-being of our people and ethical business practices across our value chain as our business resilience strategy. Our commitment extends beyond operational responsibilities to a broader impact addressing climate change, as we ensure this strategy aligns with our sustainability goals.

Sustainability Pillars:

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ENVIRONMENTAL MANAGEMENT

As the world grapples with escalating environmental challenges, their impact on communities, livelihoods and future generations grows increasingly profound. In response, TM has reaffirmed its commitment to minimising environmental harm, optimising resource efficiency and enhancing climate resilience to safeguard both people and the planet. Through sustainable innovation and responsible practices, we advance long-term environmental stewardship across our entire value chain.

This chapter focuses on two (2) material matters, which are Environmental Quality and Climate Change.

M6 ENVIRONMENTAL QUALITY

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M7 CLIMATE CHANGE

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

GOVERNANCE

Effective environmental governance is essential for integrating sustainability into decision-making, ensuring accountability and aligning climate-related risks and opportunities with TM's strategic objectives, including overseeing the management of water and waste. Our governance structure follows a top-down approach, ensuring both strategic oversight and effective execution across all business functions.

Board & Executive Oversight

At the highest level, climate governance is driven by dedicated committees and oversight mechanisms that align sustainability with TM's long-term objectives:

- **BRIC** receives quarterly updates on climate change risks and environmental management performance through ERM reporting.
- **MC** provides direction on business strategy, policies, regulatory and corporate related matters and is chaired by the GCEO.
- **TMSC** monitors the sustainability-related framework and roadmap implementation and is chaired by the GCFO.
- **BCM** Steering Committee supports resilience planning by approving BCM policies and strategies that align with TM's risk tolerance and business needs. The committee, comprising senior management from various departments, plays a key role in decision-making and overseeing BCM programmes, including physical risk and climate adaptation planning.

(IR) For details on TM's group-wide sustainability governance, refer to page 199.

Performance & Accountability

Climate-related KPIs, involving carbon reduction targets, are assigned to the GCFO, Chief Network Officer (CNO) and Chief Corporate Officer (CCO). These KPIs are cascaded across relevant managerial tiers and is one of the determining factors for incentives such as annual increments and bonuses. This ensures that sustainability performance is embedded into business functions to manage network infrastructure, data centres, buildings and fleet operations.

ENVIRONMENTAL MANAGEMENT

Implementation & Execution

To operationalise TM's environmental management and carbon reduction strategy, we established the Sustainability Working Group 6 (SWG6) under Environmental Management. Comprising the key personnel from GNT and Support Business (SB), each with KPIs on carbon emissions reduction, SWG6 is responsible for driving TM's climate-related initiatives and ensuring progress toward its sustainability commitments.

In 2024, SWG6 implemented key initiatives that further strengthened TM's overall environmental approach, which include:

- Refined and expanded Scope 1 and Scope 2 emissions baseline to enhance emissions tracking and reduction efforts and to improve the reporting boundary coverage.
- Established carbon emission reduction targets for 2025, guided by Global Enabling Sustainability Initiative (GeSI), International Telecommunication Union (ITU) and Science Based Targets Initiative (SBTi) guidelines, aiming for a 34% reduction.
- Generated the baseline of solid waste and water consumption at additional 52 TM sites.

METHODOLOGY

With guidelines from GHG Protocol Corporate Accounting and Reporting Standard, the scope of our zero-carbon efforts is based on three (3) categories:

Scope 1: Direct Emissions from Fuel Consumption

We track the amount of fuel consumed by our vehicle fleet and diesel purchased across all of TM's sites and operations, which are then converted into carbon emissions based on the Department for Environment, Food and Rural Affairs (DEFRA) Emission Conversion Factors 2024.

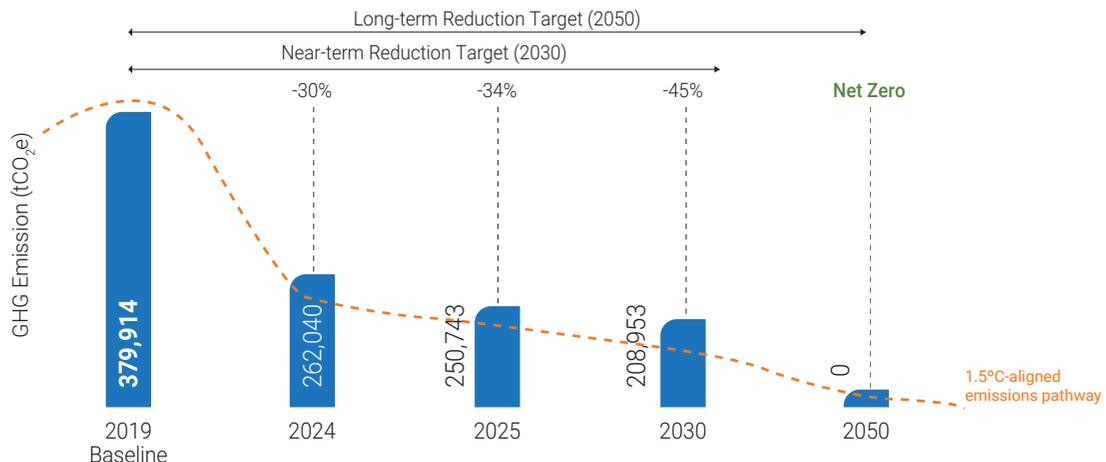### Scope 2: Indirect Emissions from Electricity Consumption

We calculate our indirect emissions based on data collected from all TM assets in Peninsular Malaysia, with a goal to cover all assets nationwide from next year onwards. The carbon emissions are converted according to the Grid Emission Factor (GEF) in Malaysia 2022 by Malaysia Energy Information Hub (MEIH).

Scope 3: Indirect Emissions from Waste Production

Similar to electricity data, we currently collect waste generation data at eight (8) sites within Peninsular Malaysia. The data is converted into carbon emissions based on the DEFRA Emission Conversion Factors 2023.

STRATEGY AND APPROACH

We adopt a comprehensive and forward-looking approach to environmental stewardship, with climate action at the forefront of our strategy. Committed to net zero emissions by 2050, we focus on mitigating and adapting to climate change, while addressing broader environmental impacts. Our Carbon Reduction Target for medium-term is set at 45% by 2030, using 2019 as a baseline. The Carbon Reduction Roadmap outlines our strategic steps toward achieving this commitment.

Carbon Reduction Roadmap showing GHG Emission (tCO_2e):
- 2019 Baseline: 379,914
- 2024: 262,040 (-30%)
- 2025: 250,743 (-34%)
- 2030: 208,953 (-45%)
- 2050: 0 (Net Zero)

Long-term Reduction Target (2050); Near-term Reduction Target (2030); 1.5°C-aligned emissions pathway

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Strategic Approach to Environmental Management

| Managing Direct Emissions (Scope 1) | Managing Indirect Emissions (Scope 2) | Data Gathering and Baselining (Scope 3) | Addressing Broader Environmental Impacts |

Strategic Approach	What We Do
1. **Managing Direct Emissions (Scope 1)**	• Address emissions from fuel consumption in fleet operations and backup power generators by minimising reliance on fossil fuels and striving to transition from internal combustion engine (ICE) vehicles to energy efficient vehicle (EEV) and electric vehicles (EVs) in fleet operations.
2. **Managing Indirect Emissions (Scope 2)**	• Prioritise energy efficiency to lower operational emissions by decreasing electricity consumption across network infrastructure, data centres and offices. • Focus on the use of renewable energy to reduce emissions, enhance energy security and support sustainable economic growth.
3. **Data Gathering and Baselining (Scope 3)**	• Improve data collection and processes to ensure accuracy of information collected and reported on business travel, employee commuting and waste management.
4. **Addressing Broader Environmental Impacts**	• Minimise our ecological impact and comply with environmental regulations beyond carbon emissions by managing waste, water use, noise and air quality and ensuring compliance with regulations. We actively encourage sustainable practices among our employees and stakeholders.

ENVIRONMENTAL MANAGEMENT

Climate Strategy & Resilience

To build long-term climate resilience, TM integrates climate considerations into decision-making, ensuring proactive risk management and future-proofing its business operations. Our approach includes:

- Embedding climate risks into business planning cycles to anticipate and mitigate potential disruptions.
- Engaging leadership and C-suite executives to assess climate exposure and drive strategic mitigation efforts.
- Leveraging scenario-based assessments to align with global best practices and enhance adaptability.

A key aspect of this strategy is conducting a comprehensive climate scenario analysis to evaluate two (2) key risk categories: transition risks and physical risks. These assessments enable TM to proactively adapt to evolving climate challenges and mitigate potential financial and operational impacts.

Assessing Physical Risks: Climate Change Impacts

In 2022, we assessed physical climate risks using the Intergovernmental Panel on Climate Change (IPCC) Representative Concentration Pathways (RCPs). These models were used to evaluate the potential impact of extreme weather events and environmental changes on TM's infrastructure and operations.

The selected RCP scenarios include:

RCP Scenarios	Scenario Details
RCP 8.5	No action leads to temperatures rising above 4°C, with emissions continuing to grow.
RCP 4.5	Some action reduces emissions by 2040, leading to warming between 2-3°C.
RCP 2.6	Ambitious mitigation efforts aim to limit global warming to well below 2°C, with emissions peaking by 2020 and declining thereafter.

Assessing Transition Risks: Policy & Market Shifts

In 2022, TM initiated a transition risk assessment, prioritising material risks with insights from senior leadership and C-suite executives. The assessment gathered key data on energy consumption, carbon footprint, material procurement prices and customer demographics to identify vulnerabilities.

Building on these insights, TM now utilises internationally-recognised models from the Network for Greening the Financial System (NGFS) and the International Energy Agency (IEA) to quantify and analyse transition risks. These scenarios help forecast policy developments, carbon pricing mechanisms and market shifts that could impact our business.

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The chosen climate scenarios for TM's transition risks include:

Governing body	Globally-Recognised Scenario Details
World Energy Outlook 2023	• **Business as Usual:** Current policies lead to temperatures rising above 2.5°C. • **Net Zero Emissions:** A plan to reduce CO_2 emissions to net zero by 2050, keeping warming below 1.5°C. • **Committed Pledges:** Assumes all announced climate promises are fully achieved, limiting warming to below 1.7°C.
Network for Greening the Financial System (NGFS)	• **Business as Usual:** Only current policies are followed, leading to temperatures rising above 2.5°C. • **Net Zero Emissions:** Strict policies and innovation reduce emissions, keeping warming below 1.5°C. • **Committed Pledges:** Includes all climate promises, even if not fully backed, limiting warming to below 2.0°C.

Financial Impact

As climate-related risks intensify, we continue to allocate resources toward strengthening climate resilience and mitigating operational disruptions. Financial preparedness is key to ensuring long-term sustainability, particularly in addressing adaptation and recovery costs associated with natural disasters.

• **Adaptation Cost Allocation:** TM has allocated more than RM490,000 through the BCM programme to enhance resilience against climate-related disruptions.

  Note: The amount is allocated for activities under the purview of BCM, Group Risk Management (GRM). It does not include the cost allocated for other divisions in TM i.e. GNT, SB and TM One.

(IR) For more information about BCM and DRP programmes:
  1. Within the BCM section, please refer to pages 237 to 239.
  2. Within the Climate Adaptation initiative, please refer to page 112.

RISKS & OPPORTUNITIES

As climate change accelerates, businesses face both risks and opportunities that impact resilience and growth. While climate risks can disrupt operations and increase costs, the shift to a low-carbon economy presents opportunities for innovation and sustainability. Proactively managing these factors is key to ensuring business continuity and long-term value creation.

Climate-Related Risk Management

We are addressing two (2) key categories of climate risks that could significantly impact our operations:

• **Physical Risks** – Risks stemming from extreme weather events such as floods, storms and rising temperatures, which could disrupt infrastructure and service reliability.
• **Transition Risks** – Risks associated with policy shifts, market dynamics and financial implications of climate regulations and the global shift towards a low-carbon economy.

Managing Physical Risks

In December 2023, our climate scenario analysis assessed 50,587 material assets across Malaysia and our supply chain identified as high-risk flood areas. This proactive approach helped mitigate disruptions and financial impacts.

Potential Impacts of Physical Risks	Mitigation Approach
Increased repair and maintenance costs for damaged infrastructure.	Risk-based infrastructure planning, prioritising climate-vulnerable areas for reinforcement.
Disruptions in service continuity, affecting customers and businesses.	Proactive network adaptation strategies, integrating climate resilience into asset management and maintenance.

ENVIRONMENTAL MANAGEMENT

To mitigate prolonged service outages, we continue to implement TM's BCM programme with BCP and DRP to safeguard operations. Key initiatives include:

- Network redundancy and hardening by design to enhance infrastructure resilience.
- Regular maintenance and operational readiness of fire prevention, detection and suppression systems.
- Insurance risk transfer mechanisms to offset recovery costs.
- Disaster Simulation Drills with NADMA to test emergency response coordination.
- FMCC on Wheels to provide seamless connectivity and content distribution in areas where fixed infrastructure is unavailable or temporarily required.

Additionally, we are enhancing flood resilience by prioritising assets near bodies of water, leveraging historical flood data to implement targeted protection measures and ensuring service continuity.

(IR) For more information about BCM and DRP programmes:

Managing Transition Risks

TM's transition risks and opportunities span short, medium and long-term horizons, aligned with business planning cycles and evolving market conditions.

Transition Risks & Opportunities Timeline		
Short-Term (1-5 Years)	**Medium-Term (5-10 Years)**	**Long-Term (>10 Years)**
Carbon Tax	Safety and Health of Workers	Susceptibility to Litigation
Material Cost	Financing	Brand Reputation
Insurance Premiums	Regulatory Changes	
Energy Demand	Increased Expectations	
	Market Expansion	

Our climate transition risk assessment has identified short-term, medium-term and long-term risks and opportunities that could shape TM's operational and financial landscape.
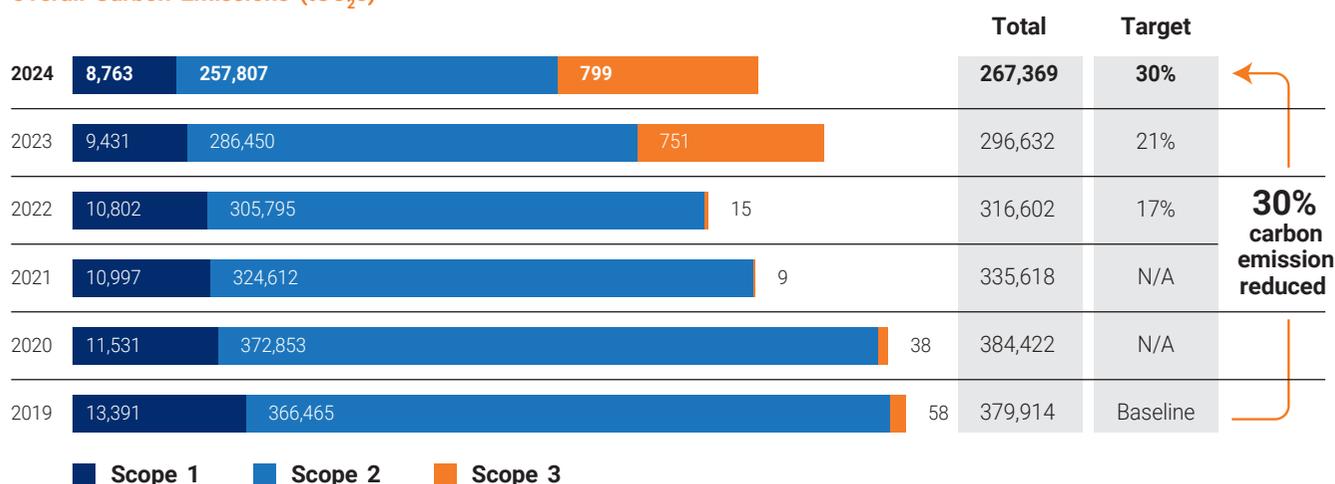
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Key Transition Risks	Potential Impact on TM	Mitigation Approach	Future considerations & opportunities
Carbon Tax & Regulatory Compliance	Potential increase in operational costs due to carbon pricing policies, affecting TM's energy-intensive operations and supply chain.	Emission reduction initiatives to stay ahead of regulatory changes and prepare for potential carbon tax implementation.	Development of climate action principles to unify the application of day-to-day decisions across the organisation as they relate to our climate.
Material Cost Volatility	Carbon-intensive materials (steel, diesel) face price surges due to stricter environmental regulations, while demand-driven price hikes impact sustainable materials (lithium, copper).	Green procurement strategies to reduce reliance on carbon-intensive materials and incorporate sustainable alternatives.	Consideration of financial cushion for long-term TM projects that use critical materials and to address potential project overruns due to material cost changes.
Insurance Premium Inflation	Increased climate-related claims could raise insurance premiums, affecting TM's operational costs.	Enhanced risk assessment and climate adaptation to minimise damage risks and optimise insurance policies.	Consideration of implementing targeted climate-related initiatives based on severity level.
Rising Energy Costs	Higher electricity and fuel costs, driven by subsidy rationalisation and the global transition toward renewable energy.	Energy efficiency measures and digital transformation solutions to reduce energy demand.	Incorporation of climate impacts into TM's financial and strategic plan.

METRICS & TARGETS

We track key metrics and targets to measure our progress in reducing emissions, improving energy efficiency and enhancing climate resilience. Aligned with global standards, these targets ensure accountability and continuous improvement.

Key Highlights

Overall Carbon Emissions (tCO$_2$e)

Year	Scope 1	Scope 2	Scope 3	Total	Target
2024	8,763	257,807	799	267,369	30%
2023	9,431	286,450	751	296,632	21%
2022	10,802	305,795	15	316,602	17%
2021	10,997	324,612	9	335,618	N/A
2020	11,531	372,853	38	384,422	N/A
2019	13,391	366,465	58	379,914	Baseline

30% carbon emission reduced

■ Scope 1   ■ Scope 2   ■ Scope 3

Note: TM started our decarbonisation journey in the year 2022 using 2019 as baseline.

ENVIRONMENTAL MANAGEMENT

What We Did

MANAGING DIRECT EMISSIONS (SCOPE 1)

Our vehicle fleet is the primary source of Scope 1 emissions and we are leveraging technology-driven solutions and fleet electrification to minimise emissions, enhance efficiency and reduce environmental impact.

Total Scope 1 Performance
(tCO$_2$e) (Fleet)

Year	Value
2019	13,391
2020	11,531
2021	10,997
2022	10,802
2023	9,431
2024	**8,763**

Fleet Fuel Consumed by Type
(Megalitres)

Year	Total Petrol Consumed	Total Diesel Consumed
2024	**2.22**	**1.65**
2023	2.33	1.75
2022	2.56	1.72
2021	2.75	1.63
2020	3.01	1.60
2019	3.59	1.78

■ Total Petrol Consumed   ■ Total Diesel Consumed

Programme	What We Did
Vehicle Optimisation Programme	Reduced overall fleet size while progressively replacing ICE vehicles with EEV and EV. The decrease in fleet size is also attributed by the phasing out of aging vehicles.

Number of ICE Vehicles

Year	Value
2022	3,462
2023	3,169
2024	**3,011**

Number of EVs

Year	Value
2023	3
2024	**20**

Note: EV first purchase was in 2023

Programme	What We Did
TM EZFleet (Car Sharing)	Launched a car-sharing platform to optimise vehicle usage, reduce redundant assets and lower fuel consumption.

Total number of EZFleet line-up nationwide = **42 units**
- ICE vehicles = **38 units**
- EVs = **4 units***

* The four (4) EVs are located at two (2) TM sites: two (2) units at Cyberjaya and two (2) units at Annexe 2.

Programme	What We Did
Generator Set (Genset) (Expanded Boundary)	Ongoing initiative in data improvement for genset emissions with enhanced collection and emission calculation methods to be fully integrated into our carbon emissions reporting by 2025, per our Sustainability Framework and Integration Plan.

The increased in total diesel purchased resulting from increased in activities to ensure uninterrupted services – contributing towards better services to our customers

Total Diesel Purchased
(Megaliters)

Year	Value
2022	2.5
2023	1.6
2024	**1.9**

Total Carbon Emissions
(tCO$_2$e)

Year	Value
2022	6,847
2023	3,993
2024	**4,856**

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What We Did

REDUCING ENERGY-RELATED EMISSIONS (SCOPE 2)

Electricity accounts for the majority of TM's Scope 2 emissions and our consumption calculated using the market-based approach.

As we expand connectivity, we also look to improve efficiency and reduce emissions by modernising networks, optimising data centre cooling and enhancing building energy management. Additionally, we are integrating a renewable energy system to further drive sustainability in our operations.

Total Scope 2 Emissions
(tCO$_2$e)

Year	Emissions
2019	356,465
2020	372,853
2021	324,612
2022	305,795
2023	286,450
2024	257,807
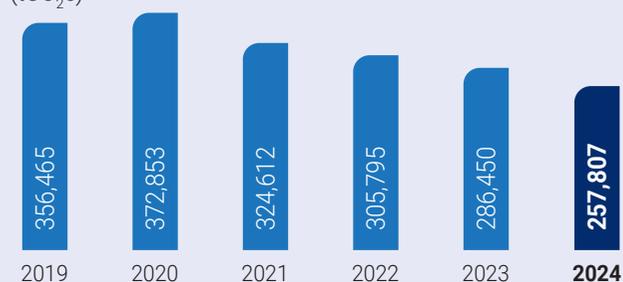
TM Electricity Consumption Breakdown by Sites (MWh)	2019	2020	2021	2022	2023	2024
Network	374,524	355,683	333,913	326,264	328,265	**317,194**
Building – Commercial	45,652	38,371	35,574	34,840	21,136	**19,853**
Building – Data Centre	49,651	54,087	58,774	69,310	79,701	**83,866**
Total	**469,827**	**448,141**	**428,261**	**430,414**	**429,102**	420,913
Renewable Energy (GET)				(27,000)	(51,200)	**(87,828)**
Percentage RE/Total Energy Consumption	**–**	**–**	**–**	**6.3%**	**11.9%**	**20.9%**

Reclassification of electricity consumption at data centres is derived from the difference of electricity usage and its third party power usage.

Electricity Usage
(MWh)

Year	Usage
2019	51,561
2020	57,115
2021	34,762
2022	90,103
2023	102,871
2024	112,606

Third party Power Usage
(MWh)*

Year	Usage
2019	1,910
2020	3,028
2021	5,989
2022	10,793
2023	23,170
2024	28,740

* Note: To be classified under Scope 3 in the future.

ENVIRONMENTAL MANAGEMENT

What We Did

REDUCING ENERGY-RELATED EMISSIONS (SCOPE 2) (CONTINUED)

Programme	What We Did	
Network		
Network Element Shutdown	Decommissioned legacy network elements and migrated services to higher-efficiency networks, cutting energy use while improving performance. **Value Created in 2024:** → Contributed **3,312 MWh** reduction from the total electricity consumption in 2024, equivalent to **2,510** tCO_2e, with network element shutdown through the decommission of **7,788** legacy network elements. The increase of network element decommissioned is contributed by a higher number of network modernisation projects in 2024 through refitting existing nodes.	**Reduction in Electricity** (MWh) 2021: 1,130 2022: 4,810 2023: 1,385 **2024: 3,312**
Energy Efficiency Optimisation (EEO)	Enhanced energy efficiency across facilities by adjusting room temperatures, replacing conventional lighting with LED and solar alternatives and optimising equipment placement. **Value Created in 2024:** → Contributed **3,431 MWh** reduction from the total electricity consumption in 2024, equivalent to **2,655** tCO_2e, through energy efficiency programmes.	**Reduction in Electricity** (MWh) 2021: 1,660 2022: 9,650 2023: 3,840 **2024: 3,431**
Buildings		
Energy Performance Contracting (EPC)	Upgraded cooling systems by installing energy-efficient inverter air conditioners and replacing outdated lighting with high-efficiency bulbs across EPC buildings. **Value Created in 2024:** → Contributed **26,200 MWh** reduction from the total electricity of 2024.	**Reduction in Electricity** (MWh) 2021: 11,420 2022: 25,000 2023: 24,500 **2024: 26,200**
Cooling Unit Upgrading (CUU)	Replaced 302 conventional air-conditioning units with energy-efficient inverter models, improving cooling performance while lowering energy usage. **Value Created in 2024:** → Achieved reduction in electricity to **47.8 MWh**	

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What We Did

REDUCING ENERGY-RELATED EMISSIONS (SCOPE 2) (CONTINUED)

Programme	What We Did
Buildings	
Data Centre Power Usage Effectiveness (PUE)	Implemented rigorous monitoring of PUE across data centres, allowing real-time optimisation of energy efficiency and operational improvements. **Value Created in 2024:** ➔ The average PUE remains between 1.6 and 1.8 despite business expansion and increased energy usage. ➔ Three (3) of TM's data centres have been certified with ISO 14001 EMS and ISO 50001 EnMS* * The three (3) certified data centres are KVDC, IPDC and Brickfields Data Centre (BFDC).
Renewable Energy	
GET	Subscribed to the GET from TNB, enabling the use of renewable energy to offset GHG emissions and reduce reliance on conventional electricity sources. **Value Created in 2024:** ➔ Renewable energy is calculated to be 20.9% of total electricity consumption for 2024 as compared to 11.9% renewable energy proportion in 2023. **GET subscription** (MWh) 2022: 27,000 2023: 51,200 **2024: 87,828**
Solar Power Purchase Agreement (SPPA)	Collaborated to provide renewable energy at TM buildings and at hybrid sites, minimising the reliance on electricity and diesel fuel. This initiative increased the renewable energy proportion from 11.9% in 2023. **Value Created in 2024:** ➔ Signed with Gentari to install solar PV systems at six (6) TM buildings in 2025, supplying about 4.3 Megawatt peak (MWp) of solar power. ➔ Signed with a network facilities provider to launch a 4G Base station powered by green electricity, replacing diesel genset usage with Solar PV, with a capacity of 5.9 kilowatt peak (kWp) – along the Kuala Lumpur Putrajaya Highway or the Maju Expressway. In addition, a 2023 project was implemented at the PLUS Highway located at Sungkai, featuring a 10 kWp Solar PV system. * This collaboration marks a significant milestone to TM in supporting goal 7, 11 and 17 of UNSDG.

ENVIRONMENTAL MANAGEMENT

What We Did

DATA GATHERING AND BASELINING (SCOPE 3)

Beyond fuel and electricity, we also track and report indirect forms of emissions to gain a broader understanding of potential improvement areas, such as waste generation, business travel and employee commuting.

Scope 3 Performance:

Total Scope 3 Emissions (tCO$_2$e)	2019	2020	2021	2022	2023	2024
Waste Generated	4	2	2	4	749	**787**
Business Travel	54	36	7	11	3	**12**
Total	58	38	9	15	751	**799**

Programme	What We Did
Waste Generation	

Responsible Waste Disposal

Enforced waste segregation at designated sites, distinguishing between solid and scheduled wastes according to the Environmental Quality (Scheduled Wastes) Regulations 2005.

Year	Current Boundary*			
	2021	**2022**	**2023**	**2024**
Total Solid Waste (metric tonnes)	467	1,013	1,441	**1,510**
Total Scheduled Waste (metric tonnes)	1.30	1.10	1.40	**2.62**

Note: The 2023 figure has been restated to 1,441 metric tonnes due to a change in methodology.

TM's Logistics Operation (LO) has appointed scrap panel dealers, who strip the cables to separate the materials by waste type for recycling, reuse or proper disposal.

Year	Expanded Boundary**			
	2021	**2022**	**2023**	**2024**
Scheduled Waste (Metal Scrap) (metric tonnes)	232	3,322	3,279	**2,950**

Value Created in 2024:
➔ TM total carbon avoidance is 1,534 tCO$_2$e *(First year disclosure)*

Note: Conversion is based on generic conversion of waste material. [Carbon Avoidance = Total Waste − Waste to Landfill]

* This scope covers eight (8) sites recognised for implementing leading environmental practices.
** Emissions from the expanded boundary is not part of 2024 carbon emissions reduction target.

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What We Did

DATA GATHERING AND BASELINING (SCOPE 3) (CONTINUED)

Programme	What We Did
Business Travel	
Business Travel Tracking	We are improving our data collection by using traveling data expenses as our priority data. Focusing on spend-based method, we expand our boundary to reflect a comprehensive emission to better represent our footprint from business travel.

Year	Current Operational Boundary*			
	2021	**2022**	**2023**	**2024**
Business Travel (Air) (tCO$_2$e)	7	11	3	**12**

Year	Expanded Operational Boundary**			
	2021	**2022**	**2023**	**2024**
Business Travel (Air) (tCO$_2$e)				**141**
Business Travel (Land) (tCO$_2$e)	–	–	4,652	**3,831**

Note: Business Travel (Air) under expanded boundary uses the spend-based method. For more information, please refer to the methodology section.

* Business Travel (Air) under current boundary was calculated based on data sourced from Group Procurement (GP) through relevant travel agencies.

** Emissions from the expanded boundary is not part of 2024 carbon emissions reduction target.

Employee Commuting

Data Collection for Employee Commuting

We collected information and computed employee commute for the first time in 2023. However, emissions stemming from this were omitted from the overall 2023 emissions to maintain consistency with the boundary established in the 2019 baseline.

We continue to track emissions from employee commute through a survey conducted to all employees.

Note: The survey for baseline (2019) was conducted in 2023.

GHG Emissions
(tCO$_2$e)

	2019	2023	**2024**
	33,889	21,131	**21,179**

ENVIRONMENTAL MANAGEMENT

What We Did

ADDRESSING BROADER ENVIRONMENTAL IMPACTS

We actively monitor our environmental impact to foster sustainability, beyond adherence to guidelines. This includes encouraging sustainable practices among our employees and stakeholders. Our latest achievement involved our major data centre which was successfully certified with ISO 14001 EMS, demonstrating our commitment to a greener solution for our customers.

Programme	What We Did
Environmental Quality For more details about Air Quality Data Breakdown, scan this QR code	Monitored air and noise quality at selected sites. As we understand the importance of environmental impact monitoring, we are continuously improving our environmental tracking to better reflect our footprint.

Environmental Indicator from Genset	Acceptable DOE Limit	Commercial Buildings	Network Buildings
Dust (mg/m³)	80	20.17 − 67.60	0.5 − 8.4
Noise (dBa) − Day	70	55.9 − 74.49	48.6 − 66.4
Noise (dBa) − Night	65	49.9 − 75.83	44.1 − 65.3

Note: The data presented reflects the range between the lowest and highest readings recorded across four (4) TM sites for Commercial buildings (TM Annexe 1, TM Annexe 2, Cyberjaya Complex and TM MITC) and four (4) TM Sites for Network Buildings (TM Bukit Timbalan, TM Miri, TM Penampang and TM Hiliran) recognised for implementing leading environmental practices.

Programme	What We Did
Going Paperless Operationally & Printer Optimisation	Streamlined TM printer usage during the recent contract renewal and fostered a culture of sustainable printing by embracing digital documents.

Digitalisation initiatives	2023	2024
Number of printed pages/papers usage	3,681,111	**1,971,000**
Number of printers	1,400	**509**

Value Created in 2024:

➡ 46% reduction against 50% target set in 2023; ongoing initiative to further improve our paperless operations.

➡ One of the factors causing the significant reduction of paper printing is a result of the reduced number of printers by 64%.

Programme	What We Did
Reduction of IT Footprint	Reduction of IT Footprint via Hardware Reclamation/Repurposing: • Extracted usable components, such as physical hard disks, RAM and keyboard, from faulty EUC devices, transforming them into spare parts for future use. • Refurbishing the EUC devices with these spare parts to ensure they are suitable for redeployment to new user.

IT Assets	Unit
End-User Computing (EUC)	390

Value Created in 2024:

➡ Minimised e-waste by extending the lifecycles of 390 EUC devices and components. *(First year disclosure)*

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What We Did

ADDRESSING BROADER ENVIRONMENTAL IMPACTS (CONTINUED)	
Programme	**What We Did**
Responsible Water Practices	Continuous water efficiency initiatives within our facilities with smart solutions and water saving objectives, such as sensor-based faucets and optimised cistern systems to reduce water wastage.

Year	2021	2022	2023	2024
Water Withdrawal (Megalitres)	221.6	179.4	131.5	**132.0**

Value Created in 2024:
- ➔ 40% reduction in water consumption against 2021 baseline across operations.* (41% reduction in 2023)

* Water withdrawal data covers eight (8) sites that implement leading environmental practices.

Mitigation Plan for Scheduled Waste Management	Engagement with the Department of Environment (DOE) to ensure compliance to the Environmental Quality Act 1974 involving: ➔ Regulation 9(4): Storage of Scheduled Wastes ➔ Regulation 10(1) and 10(2): Labeling of Scheduled Wastes

CALL TO ACTION

In 2025, improving emissions tracking and reduction efforts remain central to TM's commitment to transparency and accountability. To ensure a more accurate reflection of TM's emissions, a CO_2 organisational boundary reset will be conducted to refine emissions calculations from 2019 to 2024. This is aligned with evolving sustainability standards and deeper insights into our carbon impact. The exercise has resulted with a new Scope 1 and Scope 2 emission amounting to 422,423 tCO_2e which will be used for 2025 performance onwards.

Scope 1	For Scope 1 emissions, the boundary expanded to include TM Peninsular Malaysia, TM Sabah, TM Sarawak and diesel generators (gensets) at MMU (Cyberjaya and Melaka campuses).
Scope 2	The expanded boundary includes electricity from TM Sabah, TM Sarawak and both MMU campuses in Cyberjaya and Melaka.
Scope 3	Scope 3 reporting will incorporate employee commuting data, based on mileage claims and corporate petrol card usage collected since 2023. The carbon footprint for Scope 3 will be established in the next two (2) years.
Waste and water management	Beyond emissions, solid waste and water management remain key priorities, with plans to establish targets and initiatives to reduce waste generation and optimise water use across 60 TM sites, reinforcing TM's broader sustainability commitments.
Biodiversity agenda	With biodiversity loss emerging as a key concern, TM plans to assess the impact of its operations on biodiversity and deforestation by conducting an impact assessment in the coming years, reinforcing our commitment to environmental responsibility.

RESPONSIBLE EMPLOYER

At TM, our strength lies in the diverse talents, perspectives and ambitions of our people. We cultivate an environment where every *Warga TM* feels valued, empowered and supported in their professional and personal growth. By fostering a safe, inclusive and dynamic workplace, we drive innovation, strengthen our industry leadership and build a resilient, future-ready workforce.

This chapter focuses on three (3) material matters: Fair Employment, Health & Safety and Learning & Development.

M8 FAIR EMPLOYMENT

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M9 HEALTH & SAFETY

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M10 LEARNING & DEVELOPMENT

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

GOVERNANCE

We have established strong governance in driving responsible employment practices, workplace fairness and compliance with labour standards.

Roles & Responsibilities

Our structured top-down approach integrates sustainability and human capital management across all levels, ensuring accountability, compliance and continuous improvement.

1	**Board of Directors (BOD/Board)**	Provides strategic oversight on human capital, talent development and workplace fairness, ensuring alignment with TM's sustainability agenda.
2	**BRIC & MC**	Oversight role in providing direction related to human capital risks via TM's ERM framework, ensuring TM remains a responsible employer.
3	**Group Human Capital Management (GHCM)**	Leads workplace culture, inclusivity and employee well-being, driving initiatives on fair remuneration, benefits and employee engagement.
4	**Occupational Safety, Health & Environment (OSHE) Governance**	Ensures compliance with legal, ethical and sustainability standards, establishing policies and frameworks for a safe working environment.

Note: For details on TM's group-wide sustainability governance, refer to page 199

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Health & Safety

Our OSHE governance framework ensures seamless oversight and integration of health and safety initiatives across all operational levels through a multi-tier structure. OSHE committees convene every quarter to address ongoing and emerging issues, maintaining a proactive approach to workplace safety.

OSHE Governance Structure

Tier 1

TM Group OSHE Steering Committee

- Serves as the apex governing body for safety and health matters, focusing on strategic oversight and decision-making.
- Chaired by top management, represented by employer representatives and union presidents, with the GM of Security Management & OSHE (SMOSHE) as Secretary.

Tier 2

LOBs/Division OSHE Committee and Subsidiaries OSHE Committee

- Ensures the implementation of the corporate strategies for both divisional and subsidiary committees.
- Chaired by Heads of Department (HODs) or CEOs (for subsidiaries), these committees maintain close collaboration with Tier 1 to report progress and challenges.

Tier 3

Operational, Regional, Building & Premises and State OSHE Committee

- Focuses on localised oversight to ensure safety and health initiatives resonate with operational realities.
- Chaired by State GM, HODs or Premise Managers, these committees include representatives from both employer and employee groups, ensuring inclusivity in governance.

RESPONSIBLE EMPLOYER

Hazard Identification, Risk Assessment and Risk Control (HIRARC) approach

This procedure includes a form for accountability and compliance, with regular review and monitoring to ensure continuous improvement to the process when new changes occur. The HIRARC structured approach to managing workplace risks and ensuring safety is as follows:

Hazard Identification	→	Risk Assessment	→	Risk Control
• Identify potential sources of harm (e.g., physical, chemical, biological, ergonomic, psychosocial) in tasks, processes or the environment.		• Evaluate the likelihood and severity of harm for each hazard, prioritise risks using a risk matrix and classify them as low, medium, high or extreme.		• Apply the hierarchy of controls: 1. Elimination (most effective) 2. Substitution 3. Engineering Controls 4. Administrative Controls 5. Personal Protective Equipment (PPE) (least effective).

(IR) For more information, please refer to Our Corporate Risk section on pages 52 to 63.

Fair Employment

We enforce a zero-tolerance policy for harassment, ensuring every employee has equal rights to expression, opinion and career advancement based on merit and qualifications.

Employees can report complaints through:

TM Ethics Line – 1800 88 2377 (Toll-free) | ethic@tm.com.my (Email)
Human Resource Officer – Direct reporting for workplace concerns

In protecting employee interest and safety, due process of disciplinary action will be carried out immediately after complaints are lodged on any kind of harassment or bullying, which may result in disciplinary action in accordance with the Company's policies, procedures and guideline.

(IR) For more information, please refer to the ethics and integrity on our website at tm.com.my/ethics-integrity.

Learning & Development

TM's Learning & Development (TM L&D) arm is led by GHCM, where top management regularly assesses the skills and competencies needed for learning and development strategies, ensuring the workforce is equipped to manage emerging challenges. Our learning and development transition towards our PWR 2030 goals demand specialised new skillsets and organisational capabilities.

Policies & Frameworks

To ensure compliance with Malaysian laws and international employment and human rights standards, we have published policies and established frameworks across the Group. These can be seen below:

Health and Safety	Fair Employment	Learning & Development
• Low-Risk Rating* by 2025 Roadmap • TM's Occupational Safety and Health Management System (OSHMS) • HIRARC • OSHE Policy	• Human Resource Policy • TM Performance Management Framework • Performance Improvements Plan (PIP) • Flexi Benefits • Responsible Employer Commitment**	• Human Resource Policy (Learning & Development)

* Achieved a low-risk rating due to:
  • Likelihood – Incident occurrence is 20% lower than the national incident rate.
  • Impact – Minor severity level with no cases of permanent disability.

** Read our Responsible Employer Committee at tm.com.my/corporate/responsible-employer-commitment

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Occupational Safety, Health and Environment (OSHE) Policy

Our OSHE Policy ensures a safe and healthy environment for all employees, contractors and stakeholders across all operations, including permanent and contract services under TM's supervision. The key priorities of the policy include:

- Preventing work-related injuries and illnesses
- Ensuring compliance with legal, regulatory and ISO 45001 standards
- Promoting a culture of accountability and proactive risk management
- Encouraging employee participation in safety programmes

Read our OSHE policy at tm.com.my/sustainability/policies-guidelines

STRATEGY AND APPROACH

The well-being and professional growth of *Warga TM* plays a vital role in driving TM's success. By fostering a fair, safe and inclusive workplace, we empower our people to contribute meaningfully to TM's transformation while advancing their own careers. Our Responsible Employer strategic approach ensures that every *Warga TM* has the support, skills and environment to thrive.

Strategic Approach to being a Responsible Employer

Employee Well-Being & Engagement	Fostering a Diverse, Inclusive & Respectful Workplace	Developing Future Leaders within TM	Organisational Health & Safety

Strategic Approach	What We Do
1. Employee Well-Being & Engagement	• Ensure the well-being of our employees, prioritising productivity and overall workplace satisfaction. • Includes clear communication, efficient performance reviews and freedom to join associations through unions.
2. Fostering a Diverse, Inclusive & Respectful Workplace	• Enrich a workplace with a vibrant talent mix of creativity, energy and innovation that champions inclusion and prevents discrimination based on race, ethnicity, gender, sexual orientation, age, religion, disability, political beliefs or any other protected characteristics.
3. Developing Future Leaders within TM	• Future-proof TM employees by equipping them to manage sustainability challenges, through training and development including digital skills, with a target to achieve all *Warga TM* to be digitally skilled, with 40% becoming digitally competent. • Provide *Warga TM* with opportunities to enhance their value through various development programmes, including leadership, future skills, business skills and culture/mindset.
4. Organisational Health & Safety	• Safeguard our workplace through a proactive, consultative and participatory process involving all stakeholders.

RESPONSIBLE EMPLOYER

The OSHE Roadmap

Through TM's **"Safety. We Own It."** framework, we have built a proactive, data-driven and people-centric safety culture, reducing workplace risks and setting new industry benchmarks. This approach ensures that every *Warga TM* takes ownership of workplace safety, creating a culture of accountability and continuous improvement.

The Enhanced OSHE Roadmap

1. Leadership Commitment Compass
By embedding safety into our core values, our leaders walk the talk, ensuring accountability and clear communication at every level.

2. Employee Involvement & Participation
Empowered employees make a safer workplace. Through self-audit and recognition programmes, we turn every team member into a safety champion.

3. Embedding Safety in Every Decision
From risk-based decision-making to integrating safety KPIs, we ensure that every move we make prioritises safety.

4. Revolutionising Safety via Digitalisation
We leverage real-time analytics, blockchain compliance and single-point safety management to predict risks, boost compliance and create a smarter, safer environment.

5. Strategic Contractor Management
We hold our contractors to the same high standards, ensuring their performance aligns with our expectations. Through leadership commitments and rewards, we build a safer supply chain.

6. Comprehensive & Interactive Safety Knowledge
We cultivate a learner's mindset, provide e-learning modules and maintain training logs to continuously upskill our people.

7. External Collaboration & Engagement
By working closely with regulatory bodies and industry experts, we drive innovation, set new boundaries and strengthen national safety standards.

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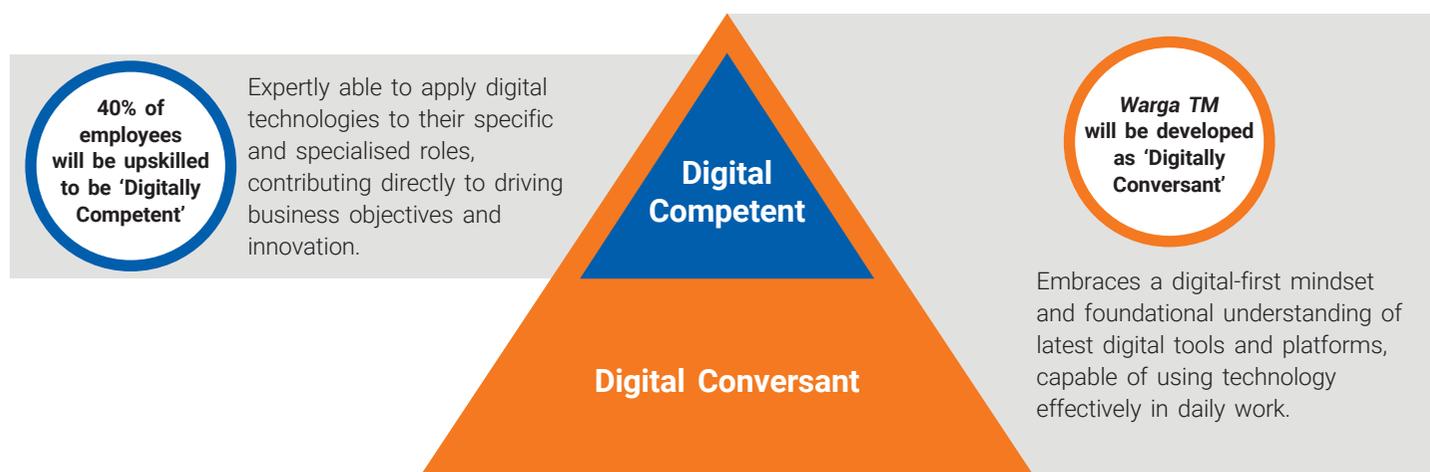
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Learning & Development

As part of our commitment to developing future leaders, TM's Learning & Development Framework ensures that *Warga TM* are equipped with the digital skills, leadership capabilities and future-ready competencies needed to drive TM's transformation.

We're preparing *Warga TM* to thrive as a Digital Powerhouse by 2030. Our continuous learning commitment ensures every team member is equipped for both current and future roles, fostering a culture of growth and adaptability.

To become a Digital Powerhouse, *Warga TM* must be Digital Citizen. Our strategic objective is to ensure that all *Warga TM* are digitally skilled, with 40% becoming digitally competent to drive sustainable innovation and growth.

TM Digital Competent and Digital Conversant Aspiration Diagram

40% of employees will be upskilled to be 'Digitally Competent'

Expertly able to apply digital technologies to their specific and specialised roles, contributing directly to driving business objectives and innovation.

Digital Competent

Digital Conversant

***Warga TM* will be developed as 'Digitally Conversant'**

Embraces a digital-first mindset and foundational understanding of latest digital tools and platforms, capable of using technology effectively in daily work.

RISKS & OPPORTUNITIES

TM assesses risks-based qualitative aspects such as employee retention, feedback and requirements from LOBs and quantitative thresholds such as training completion and level of assessments. Risk Management oversees TM's overarching risk and mitigation for the Group, while TM's L&D unit is responsible for ensuring that all *Warga TM* are knowledgeable, competent and equipped with the right skill sets to build a prepared, engaged and future-ready workforce.

Risk Category:

Risks	Strategic Approach
• **Workplace Injuries and Infectious Diseases Outbreaks:** Require a proactive safety culture to prevent incidents and the spread of infectious diseases.	
• **Inaccurate Matching of Skillsets to the Right Employee:** Inadequate digital skillsets to address business requirements and growth.	
• **Rising Costs of Manpower Escalating at a Higher Rates:** Balancing the overall costs of manpower, beyond employee salaries, which includes investments on training and upskilling, claims and benefits.	

Opportunities	Strategic Approach
• **Secure OSHE Data Management of Workers' Incidents Information:** Protecting confidentiality of workers in an encrypted digital system, such as the OSHE Intelligence System.	
• **Right Skilling of Employees to Address Business Requirements:** Building strong digital skillsets through various development programmes to meet business requirements and drive our growth.	
• **Manpower Cost Optimisation:** Creating flexible opportunities for both TM and employees, such as hiring of niche critical digital skills and internal talent mobility to fill in vacancies.	

RESPONSIBLE EMPLOYER

METRICS & TARGETS

Defined performance indicators to measure progress in employee engagement, Diversity, Equity & Inclusion (DEI), health and safety and workforce development.

Key Highlights

Employee satisfaction and well-being

Organisational Health Index (OHI) of
80

Gender diversity

Increased women representation in senior management to
35% (Target: 34%)

ASPIRE graduates achieved a
17% promotion rate, with
a further **5%** experiencing job rotations or role expansion

Protected employees' safety with disciplinary actions

Zero reported cases of workplace discrimination

Learning & development for *Warga TM*

Invested more than
RM20 million
on training and development

16,098
Employees trained, with a total of
812,430
hours of training delivered

3,827
Employees participated in the 'Spark the PWR' programme (Target: 2,500)

11,153
Training sessions conducted

1,744
Employees achieved Digital Competent level (Target: 1,500)

16,406
Digital Conversant employees trained (Target: 14,000)

3,691
Employees enrolled in the NextSTAR programme (Target: 2,400)

Insights from the Safety Culture Survey

63.3%
Employees completed the survey (Target: 50%)

Identified key gaps in worker perceptions on
safety culture

Conducted OSHE training for
14,053
employees

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What We Did

EMPLOYEE WELL-BEING & ENGAGEMENT

1. OHI

Assessed through job satisfaction, sense of purpose, stress and happiness as well as overall employee experience. These are supported by TM's comprehensive employee benefits such as medical coverage, compassionate leave and wellness programmes, reflecting the organisation's commitment to cultivating a positive and supportive work environment.

> **Value Created in 2024:**
> → **15,000** employees invited to participate.
> → **74%** (11,031) employees provided responses.
> → OHI score of **80**.

2. Flexible Working Arrangement

Offered a hybrid working arrangement for all employees, promoting greater flexibility and improved work-life balance while maintaining productivity.

> **Value Created in 2024:**
> → All employees can work a hybrid working arrangement, which is three (3) days from the office and two (2) days from anywhere within a two (2) hour radius from the registered office.

3. Employee Benefits

Benefits for employees range from insurance to leave options as well as a variety of claimable items under TM's Flexi Benefits Schemes. They are:

1. Flexi Benefits

Allows *Warga TM* to choose and customise the best benefits for their needs with the flexibility to adjust them annually. Among the benefits include:
- Expenses for Personal Vehicles;
- Wellness programmes, clubs or fitness centres;
- Fitness Equipment;
- Smart Device.

2. Additional Leave Options

Compassionate leave for up to seven (7) days is given to employees, which can be used for child, spouse, parent, sibling or relatives with physical or mental health conditions.

Self-recovery leave is available up to three (3) days) if they still have prescribed medication at home without going to the clinic, but need additional time to fully recover. This initiative enhances employee well-being, ensuring they return to work refreshed and energised.

3. Insurance and Medical Coverage

Group Term Life (GTL) and Group Personal Accident (GPA) insurance and reimbursement fees are available to all employees. Medical coverage is offered to all employees, including temporary and part-time personnel.

4. Voluntarily Separation Scheme (VSS)

Voluntary Retirement Plan (MESRA) and the Voluntary Separation Plan (VSP) are special programmes offered to permanent employees who choose to retire or separate from the company voluntarily, based on specified terms and conditions. These plans apply to different age categories and come with different calculation methods tailored to each group.

> **Value Created in 2024:**
> → All employees covered for medical benefits.
> → **5,853** employees applied for compassionate leave.
> → **6,927** employees applied for self-recovery leave.
> → **288** employees' applications for VSS approved.

RESPONSIBLE EMPLOYER

4. Workplace Stress Management
Designed to help manage and reduce workplace stress, promoting mental well-being and productivity, such as webinars and health talks.

Value Created in 2024:
- **25** webinars and health talks held.
- **13,856** total employees attended.

5. Protecting Employees Through Unions
Recognised four (4) unions allowing employees to take collective action according to their best interest. They are:
- National Union of Telecommunication Employee Peninsular Malaysia (NUTE)
- Union of Telecoms Employees Sarawak (UTES)
- Sabah Union of Telecom Employees (SUTE)
- Sabah Union of Telecommunication Employees (SUTEN)

Value Created in 2024:
- **6,145** number of unionised employees.
- **75%** of employees with collective bargaining agreements.
- **2,062** number of non-unionised members.

Healthy Living Programmes	What We Did
GCEO Step Challenge	Promotes team building and healthy competition while encouraging physical activity to boost overall health, morale and job satisfaction. It supports mental well-being by reducing stress, enhancing workplace culture through a positive and active environment and promotes a work-life balance by encouraging movement beyond work hours. Additionally, it raises health awareness and leverages our digital health app, offering *Warga TM* valuable tools for personal health management. **Value Created in 2024:** - 7,088 employees engaged in GCEO Step Challenge with a total cumulative steps of 852,036,457.
***Bumiku* Cityrace**	Raises environmental awareness and sustainable practices through a fun treasure hunt while educating *Warga TM* on the importance of environmental practices. It also serves as an engagement platform to foster team bonding and a positive work culture. **Value Created in 2024:** - 135 employees from nationwide offices participated in *Bumiku* Cityrace.

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FOSTERING A DIVERSE, INCLUSIVE AND RESPECTFUL WORKPLACE	
Programmes	**What We Did**
ASPIRE	Launched in 2023, the programmes targeted to middle-management women with leadership potential, aiming to prepare them for higher roles within two (2) years. Participants are assessed through structured leadership profiling, coaching and mentoring. Since its establishment, a total of 60 participants have completed the programmes. **Value Created in 2024:** ➡ 30 participants completed the programmes. ➡ 17% of 60 participants promoted into senior management roles, increasing the percentage of women in senior management.
Comprehensive Parental Support	• Provided on-site childcare facilities at TM Dynamic Kids and TM MITC at affordable rate. • Provided lactation facilities at: – TM Annexe 1. – TM Annexe 2. – TM Campus Cyberjaya. • Flexible parental leave options covering: – Maternity leave: Up to 98 days for five (5) children. – Paternity leave: Up to seven (7) days for five (5) children. Other benefits via Flexi Benefits include Children's Daycare and Education. **Value Created in 2024:** ➡ 6,164 number of employees who returned to work after parental leave ended. ➡ 100% retention rates of employees who took parental leave.
Zero Tolerance for Harassment	Carried out due process of disciplinary action after complaints were lodged on any kind of harassment and bullying, proactively encouraging reports to be made immediately. Also conducted awareness sessions on sexual harassment at the workplace regularly. **Value Created in 2024:** ➡ Found two (2) disciplinary cases, which were both resolved with appropriate action. ➡ No reported cases of workplace discrimination.

RESPONSIBLE EMPLOYER

DEVELOPING FUTURE LEADERS WITHIN TM

Performance Review

In 2024, TM continues the implementation of the Executive Performance Management Framework twice a year that emphasises both outcomes and methods – the 'what' and 'how'. This framework applies an 80-20 principle, allocating 80% to Individual & Organisational KPIs and 20% to Behavioural Assessments, in line with our #IniCaraKita culture to foster a high-performance culture. Additionally, we enhanced efficiency by digitalising our Performance Management System, streamlining processes like Performance Calibration, C-Level Scorecard and the TM Leadership Competency Survey.

Value Created in 2024:
Performance review by employee:
- Management: **227**
- Executive: **9,591**
- Non-Executive: **8,616**

Employee Training and Development Programmes	What We Did
Digital Competent	Programme for digital talents to expertly apply digital technologies to their specific and specialised roles. **Value Created in 2024:** ➲ 1,744 executives attended (target of 1,500, achieved 116%).
Digital Conversant	Programme for employees to embrace a digital-first mindset and foundational understanding of latest digital tools and platforms to be effectively used in daily work. **Value Created in 2024:** ➲ 16,406 employees attended (target of 14,000, achieved 117%).
Top Talent Development Programme	Programmes designed to strengthen leadership capabilities at all levels, aligned to succession planning with the objective to build a prepared, engaged and future-ready workforce. **Value Created in 2024:** ➲ 437 executives attended.
NextSTAR	Programme to cultivate *Warga TM's* entrepreneurial and customer-centric mindset by providing product knowledge and selling skills. **Value Created in 2024:** ➲ 3,691 employees attended (target of 2,400, achieved 153%).
Spark the PWR	Programme to foster a mindset of innovation, entrepreneurship, boldness and unity throughout the organisation. **Value Created in 2024:** ➲ 3,827 employees attended (target of 2,500, achieved 153%).
Advance Pesona	Programme to enhance customer service skills. **Value Created in 2024:** ➲ 1,405 employees attended (target of 1,405, achieved 100%).
Sales Academy	Programme designed to develop the sales workforce based on their roles and responsibilities. **Value Created in 2024:** ➲ 663 employees attended (target of 500, achieved 132%).
Certifying Agency (CA)	Programme to develop and certify contractors as competent cabling workers in accordance with business and government requirements. **Value Created in 2024:** ➲ 593 sessions completed (target of 420, achieved 141%).

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ORGANISATIONAL HEALTH & SAFETY	
Programmes	**What We Did**
Life Saving Rules (LSRs)	Designed to address high-risk activities and prevent severe injuries and fatalities, these rules are prioritised to focus on activities with significant hazard potential. **Value Created in 2024:** ➲ 14,053 employees trained.
Safety Culture Survey	Used to evaluate and strengthen TM's safety culture, identifying key gaps in worker perceptions, leading to more focused interventions. **Value Created in 2024:** ➲ 11,561 (63.3%) of employees completed the survey.
Site Inspections and Audits	Conducted Contractor Management audit programme with Facilities Management. Employee representatives participated in workplace inspections, providing first-hand insights into existing conditions and ensuring compliance with safety procedures. **Value Created in 2024:** ➲ 15 contractors from the Eastern Region participated in the audit. ➲ Reduced contractor-related safety incidents by 30%. ➲ Achieved low TM OSHE Risk Rating with likelihood over 20% lower than The National Incident Rate. ➲ Severity: Minor with no permanent disability. ➲ Zero work-related employee fatalities, over the last three (3) years.

CALL TO ACTION

Our outlook as a Responsible Employer is reinforced through our commitment to foster a workplace that continues to prioritise the well-being of our employees.

This begins with TM's OSHE Plan for 2025-2026, which details initiatives for proactive risk management and enhanced well-being programmes. For example, this includes launching the next-generation OSHE Intelligence System (OSHEIN). Powered by AI, OSHEIN will enhance workplace safety through real-time monitoring, predictive analytics and corrective recommendations. By enabling faster risk identification, it will strengthen compliance tracking and drive proactive safety management.

Furthermore, fair employment practices will remain a priority, with equitable policies, competitive benefits and a focus on work-life balance. We will also continue to invest in learning and development, where we focus on future-ready skills, leadership programmes and career advancement opportunities. We will build a digital talent pipeline through the TM Talent Marketplace to deliver digitally-skilled employees, fuelling new growth and revenue.

By nurturing talent and fostering an innovative mindset, we continue to empower our people to drive TM's long-term success while achieving their full potential.

RESPONSIBLE EMPLOYER

The OSHE Plan for 2025-2026

Goals	Key Actions
1. Achieve & Maintain a Low-Risk Rating in 2025 Transition from high-risk to low-risk by maintaining robust safety protocols and continuously reducing incident rates.	• Strengthen compliance with LSRs. • Increase safety audits to identify and address gaps promptly. • Expand contractor safety management programmes.
2. Foster a Stronger Safety Culture Achieve high employee engagement in OSHE initiatives.	• Conduct annual Safety Culture Surveys and develop action plans based on feedback. • Establish workplace safety champions to advocate for safety at the departmental level. • Incorporate gamification elements into safety training programmes to boost participation and retention.
3. Broaden the Scope of Preventive Health Programmes Address emerging occupational health risks, including mental health and ergonomic challenges.	• Introduce mental health programmes with stress management workshops and counselling services. • Expand health screenings to include lifestyle-related diseases (e.g., diabetes, hypertension). • Conduct ergonomic assessments for all office and field roles, implementing necessary adjustments to reduce long-term health risks.
4. Expand OSHE Training for the Digital Era Ensure all employees are well-equipped to handle safety challenges during the course of their work.	• Launch e-learning modules for hazard-specific training, available on-demand. • Create Virtual Reality (VR)/Augmented Reality (AR) simulations to train workers in high-risk activities for a safe and controlled environment. • Train 100% of contractors on new digital safety platforms.
5. Strengthen Industry Collaboration with GLC OSH Net	• Engage with regulators to influence and adopt updated safety guidelines. • Participate in industry safety forums to benchmark performance and share best practices.
6. Improve Performance Metrics and Reporting Set ambitious safety and health targets for 2026 with clear metrics to track progress.	• Reduce incident rates by an additional 10% by 2026. • Achieve zero fatalities through rigorous safety compliance. • Integrate ESG metrics into OSHE reporting for transparency and stakeholder trust.

i) For more info on TM's recognition as a responsible employer, visit tm.com.my/corporate/achievements
ii) For additional Responsible Employer's performance data, visit tm.com.my/sustainability/appendices-download

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ETHICAL BUSINESS – SUSTAINABLE SUPPLY CHAIN

With over 2,000 active suppliers, TM's supply chain is one of the major drivers of our impact, making sustainable sourcing essential to safeguarding both our suppliers and ensuring sustainability performance. As one of the key stakeholder groups, our suppliers play a crucial role in upholding our sustainability standards and we are committed to supporting and empowering them through fair practices, capacity building and collaboration. By integrating sustainability into every stage — from pre-sourcing to post-sourcing — we ensure compliance and resilience, as well as driving long-term positive change.

This chapter focuses on one (1) material matter: Sustainable Supply Chain.

M11 **SUSTAINABLE SUPPLY CHAIN**

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

GOVERNANCE

Effective governance in the supply chain serves as the foundation for integrity and accountability. Through clear policies, an unwavering commitment to ethical sourcing and a clear governance structure, we foster responsible and transparent partnerships. TM's comprehensive frameworks proactively address and minimise potential risks related to labour standards and human rights, ultimately creating a resilient and ethically sound supply chain.

Roles & Responsibilities

We have a strong governance framework that effectively drives a sustainable supply chain, ensuring clear and consistent oversight from the Board on high-level procurement strategies and policies. Strategic suppliers decisions, however, are guided by dedicated procurement approval committees.

In line with our commitment to transparency and continuous improvement, we have provided comprehensive updates to both the MC and the BRIC regarding the progress and performance of our sustainability initiatives, in accordance with applicable reporting standards.

At the operational level, GP enforces procurement governance and ensures effective implementation. To drive accountability, supplier-related targets and KPIs are embedded across these governance structures, ensuring ethical sourcing, responsible business practices and long-term supply chain resilience.

01 **The Board**
• Headed by Chairman of TM

02 **Board Tender Committee (BTC)**
• Headed by the Chairman of BTC
• Approved strategic procurement policies such as Sustainable Supply Chain Policy and the Bumiputera Policy
• Oversees high-level procurement strategies
• Reviews and approves procurement compliance and decisions

03 ***Jawatankuasa Penilaian Perolehan* (JPP) I/II**
• Chaired by GCEO and GCFO
• Reviews and approves procurement compliance and decisions

04 **Group Procurement (GP)**
• Headed by the Chief Procurement Officer (CPO)
• Oversees procurement governance while specialised units manage category strategies, compliance, supplier relationships and performance evaluations

ETHICAL BUSINESS – SUSTAINABLE SUPPLY CHAIN

Policies & Frameworks

These policies guide TM in managing procurement and supply chain processes with an emphasis on fairness, transparency and sustainability. The Procurement Policy ensures that goods and services are acquired efficiently and legally, while Procurement Ethics establishes standards to prevent corruption and promote integrity. In addition, the Bumiputera Vendor Development Programme (BVDP) and Bumiputera Policy are designed to support local vendors by providing opportunities for growth and capability building.

The Sustainable Supply Chain Roadmap 2024-2026 and Sustainable Supply Chain Policy outline strategies for integrating environmental and social elements (including labour rights) - into the supply chain, promoting long-term responsible practices. TM CBE sets expectations for suppliers regarding ethical behaviour and environmental stewardship. Collectively, these policies ensure that TM creates an ethical, sustainable and inclusive procurement system while fostering strong and responsible supply chain partnerships.

Supply Chain Management

- Procurement Policy
- Procurement Ethics
- BVDP

- Bumiputera Supplier (SOP)
- Sustainable Supply Chain Policy
- TM CBE
- TM Sustainable Supply Chain Roadmap 2024-2026

In addition to the policies that govern our supply chain management, prioritise ESG compliance and business continuity, they are also closely aligned with TM's Anti-Corruption Guide (ACG) and CBE. These mandates ensure that our suppliers uphold ethical business practices, reinforcing TM's commitment to ethical and sustainable supply chain practices.

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STRATEGY AND APPROACH

TM's procurement approach is anchored on the TM Procurement Framework, which ensures that all sourcing decisions align with sustainability objectives, promoting strategic and responsible procurement. From pre-sourcing to post-sourcing, we have set clear targets and commitments to integrate sustainability and embed ESG compliance into procurement and supply chain operations.

Guided by this framework, the Sustainable Supply Chain Roadmap 2024-2026 sets out a structured approach to sustainable procurement across TM Group. The roadmap focuses on two (2) key areas: Policy & Assessments and Capacity Development. Additionally, in 2024, we established our Sustainable Supply Chain Policy, which integrates ESG criteria into the business and technical requirement during our supplier selection process.

THE SUSTAINABLE SUPPLY CHAIN ROADMAP 2024-2026

2024

Focused on laying the foundation for our sustainability initiatives.

Developed a comprehensive policy that includes clear sourcing criteria, which will be integrated into both our technical specifications and business requirements.

Created training modules and continue to conduct training sessions for suppliers as part of our capacity-building efforts.

Enhanced capabilities and raised awareness about sustainability, ensuring they are aligned with our objectives.

2025

Expanding sustainability integration by incorporating sustainability criteria into the supplier on-boarding process and tender specifications.

Offering customised training sessions, designed to address the specific needs of each supplier, ensuring they are equipped to meet sustainability standards and drive improvements within their own operations.

2026

GOAL: To fully embed sustainability into our procurement process.

Integrating sustainability criteria into all technical specifications for tenders, ensuring that all suppliers align with our sustainability goals.

Continue providing customised training for our suppliers, reinforcing their capabilities and supporting ongoing improvements in sustainability practices.

ETHICAL BUSINESS – SUSTAINABLE SUPPLY CHAIN

Strategic Approach to Sustainable Supply Chain

| Capacity Building and Engagement | Supplier ESG Compliance | Seamless and Efficient Procurement |

Strategic Approach	What We Do
1. **Capacity Building and Engagement**	• Equip suppliers with the essential insights and resources to fully integrate and understand the critical role sustainability plays in driving both business success and environmental responsibility.
2. **Supplier ESG Compliance**	• Ensure suppliers meet our ESG criteria such as reporting their environmental impact, adopting ethical business practices and fostering positive social change. • Collaborate with suppliers to implement corrective actions when necessary.
3. **Seamless and Efficient Procurement**	• Promote sustainable practices across the value chain into the procurement processes, ultimately improving touchpoints for vendors engaging with TM.

RISKS & OPPORTUNITIES

As a digital infrastructure leader with an extensive supplier network, TM is inherently exposed to the practices and ethical standards of its suppliers, making responsible sourcing critical to mitigating risks.

To address this, we enforce contractual ESG clauses, evaluate supplier performance and enhance transparency through the Supplier Self-Service (SUS) Portal. We also diversify our supplier base and conduct risk assessments to reduce dependency on high-risk suppliers.

Risk Category:

Risks	Strategic Approach
• **Supplier Non-Compliance with ESG Standards:** Some suppliers fail to meet environmental, social and governance standards due to limited awareness or resources.	
• **Supply Chain Disruptions:** Reliance on non-sustainable suppliers increases vulnerability to disruptions caused by environmental regulations or ethical violations.	
• **Reputational Risk:** Partnering with non-compliant suppliers could harm TM's reputation.	

Opportunities	Strategic Approach
• **Collaboration with Sustainability Agencies:** Continuously develop and establish best practices, including trainings, for our suppliers in order to enhance their ESG awareness and reporting.	
• **Elevate Local Vendor Capacities:** Provide local vendors with opportunities to be part of TM's supply chain ecosystem.	
• **Benchmarking Industry Standards with Stringent Policies:** Establish a stringent vendor selection process and evaluation criteria.	

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METRICS & TARGETS

Our journey towards a sustainable supply chain is guided by reliable metrics and meaningful targets, which drives continuous improvement. By consistently monitoring our performance and refining our metrics to focus on areas of greatest impact, we effectively identify opportunities and elevate supplier practices, contributing to TM's broader sustainability commitments.

Key Highlights

Monetary Contributions to Suppliers

Breakdown of Procurement Contribution (RM billion)	2021	2022	2023	2024
Overall Suppliers	3.3	4.0	2.7	3.5
Local Suppliers	2.5	3.1	2.0	2.7

Breakdown of Procurement Contribution (%)	2021	2022	2023	2024
Local Suppliers	77%	77%	74%	76%
International Suppliers	23%	23%	26%	24%

Developing Competencies for Suppliers

Suppliers' competencies in ESG increased by **13%**, with 260 suppliers participating in the survey of 2,077 active suppliers

90 Bumiputera vendors and **3,993** jobs were supported, elevating their skills and market competitiveness

Ensuring Compliance and Engagement with Suppliers

260 of our active suppliers have made significant improvements in their ESG awareness, reporting and practices
- 107 active suppliers with Environmental Policies/Criteria in place
- 213 active suppliers with Social Policies/ Criteria in place

Capacity Building Programmes for Suppliers

Conducted eight (8) capacity and development building programmes for suppliers, with **165** in attendance during these programmes

Supplier Relationships

Supplier Satisfaction Index (SSI) **increased** to 8 from 7.9 in 2023

Procurement Maturity Index (PMI) **improved** to 8.1 compared to 8.0 in 2023

ETHICAL BUSINESS – SUSTAINABLE SUPPLY CHAIN

ESG Compliance among TM suppliers

Total number of significant suppliers participating in self-assessment	27
Breakdown of significant suppliers	
Mega Suppliers	**10/10 (100%)***
Mid-tier Suppliers	**16/17 (94%)***

* Participating suppliers

Breakdown of Suppliers

Total number of active suppliers	2,077
Total number of significant suppliers	49
Breakdown of significant suppliers	
Mega Suppliers	12
Mid-tier Suppliers	37
Percentage of total spend on significant suppliers	35%

What We Did

CAPACITY BUILDING & ENGAGEMENT

1. **ESG Reporting Training**
   Delivered five (5) in-depth training sessions (online & physical), including the physical training conducted by Capital Market Malaysia (CMM) on Simplified ESG Reporting Guide (SEDG), equipping suppliers with the tools to navigate sustainability reporting and disclosure requirements.

   > **Value Created in 2024:**
   > ➲ **165** suppliers trained in ESG reporting.

2. **Empowering Bumiputera Vendors**
   The BVDP equipped and empowered vendors with the skills and resources to meet industry standards through training and supplier support, such as mentorship and financial facilitation.

   > **Value Created in 2024:**
   > ➲ Introduced the InnoTrack programme, an engagement model for Bumiputera ICT & Digital Application vendors to transform and commercialise ideas into revenue generation through a co-creation model.

3. **Industry Collaboration & Peer Learning**
   Continued collaborations with sustainability training consultants and peer-sharing networks such as the CAN to ensure ongoing learning and knowledge exchange for suppliers.

   > **Value Created in 2024:**
   > ➲ Equipped suppliers with the latest sustainability knowledge, fostering continuous improvement and industry best practices.

4. **Online self-assessment surveys**
   Provided valuable insights into our suppliers' application of ESG principles, revealing that many are in the initial stages of ESG adoption and face resource constraints that hinder full implementation. To address these findings, we plan to enhance their ESG capabilities through targeted briefing sessions on TM's sustainability expectations and expand our on-site sustainability surveys to additional high-impact and high-risk suppliers.

   > **Value Created in 2024:**
   > ➲ **53%** of mega and mid-tier suppliers from the assessed suppliers rated level 3 where they passed with a score of **70%** and above.
   > ➲ **260** suppliers have improved their ESG awareness and disclosure practices.

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What We Did

SUPPLIERS ESG COMPLIANCE

1. Encouraging Low-Carbon Transition Across the Supply Chain
Suppliers are encouraged to adopt renewable energy and low-carbon technologies such as solar energy and EEV.

Value Created in 2024:
→ A total of **187** suppliers adopted these technologies.

2. TM's Sustainable Supply Chain Policy
This comprehensive policy ensures suppliers' compliance by integrating specific ESG metrics, such as responsible sourcing, energy efficiency and robust waste management systems. This has been communicated to our suppliers and published on the TM website, aiming to raise awareness among employees and stakeholders about our sourcing and sustainability expectations.

Value Created in 2024:
→ **70** suppliers trained on ESG principles, including the Sustainable Supply Chain Policy, during ESG training sessions.

SEAMLESS AND EFFICIENT PROCUREMENT

1. Transforming Procurement Through Digitalisation
Initiated a digital transformation initiative to automate and optimise procurement processes, enhancing efficiency, transparency and internal controls across the supply chain.

Value Created in 2024:
→ Overall project progress as of 2024 is **69%**.
→ Go Live module: Category Management and Sourcing.

2. Building a Sustainable Supplier Base
Established a sustainable supplier base for the Group Information Technology and Digital (GITD) division, where suppliers are required to comply with sustainability standards. Led by the Sustainability Working Group 5 (SWG5): Sustainable Supply Chain, this initiative forms a key part of the supply chain roadmap.

Value Created in 2024:
→ SWG5 endorsed the establishment of sustainability sourcing criteria to be incorporated as part of the technical/business requirements for GITD.

ETHICAL BUSINESS – SUSTAINABLE SUPPLY CHAIN

No Tolerance for Forced Labour

Forced labour is a modern form of slavery, stripping individuals of their rights and dignity.

At TM, we strive to eradicate this injustice within our supply chain through strict governance and zero-tolerance policies. Through our Sustainable Supply Chain Policy, Procurement Ethics Policy and CBE, TM mandates strict compliance with International Labour Organisation (ILO) conventions and Modern Slavery laws. We require all suppliers to prohibit forced or involuntary labour while upholding fair labour practices, environmental responsibility and integrity in contractual obligations.

(IR) For more information, please read our policies at tm.com.my/sustainability

We Enforce Compliance and Accountability

Supplier Compliance Monitoring:	Strict Enforcement:	Capability Building:	Whistleblowing & Transparency:
Conducts regular assessments to identify and address any forced labour risks.	Imposes corrective actions, including contract termination, for non-compliance.	Provides supplier training through the BVDP programme, ensuring awareness of labour laws, ethical sourcing and responsible employment practices.	Maintains accessible whistleblowing channels for suppliers and workers to report unethical labour practices.

CALL TO ACTION

Looking ahead, the next phase of our journey will focus on strengthening our supply chain by ensuring our suppliers align with our core values. Our plan enhances due diligence, assesses sustainability-related risks and sets clear targets for supplier performance. These measures aim to create a more responsible, transparent and sustainable supply chain that supports the long-term success of our business while advancing our sustainability goals:

1. **Pilot Assessment of Due Diligence for New Suppliers**

   Introducing a due diligence process for evaluating all suppliers adhering to ESG practices to help us identify potential gaps or challenges in the process, providing valuable insights before its full-scale implementation. This phased approach allows us to make necessary adjustments, ensuring that the evaluation method is robust and fully aligned with our sustainability objectives.

2. **Sustainability-Related Risk Assessment and Mitigation for Suppliers**

   This desktop study approach focuses on identifying ESG risks within the supply chain, such as environmental impact, OSHE and ethical business conduct. Once risks are identified and addressed early, we target to implement tailored mitigation strategies.

3. **Setting Targets for Suppliers Passing the ESG Assessment**

   To drive continuous improvement in our supply chain, we aim to set specific targets for the percentage of suppliers passing our ESG assessments. This goal-oriented approach will not only motivate suppliers to meet our sustainability criteria but also create a measurable benchmark to track progress. Achieving these targets will enhance our supply chain's sustainability, strengthen our company's reputation and reduce risks related to non-compliance.

   By integrating these strategic initiatives, we aim to build a stronger, more sustainable supply chain that reflects our core values and long-term vision for responsible business.

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ETHICAL BUSINESS – RESPONSIBLE CONDUCT

Strong governance is the foundation of trust and accountability, guiding our ethical conduct in every decision, from business integrity and responsible disclosures, to ensuring cyber security with data privacy and protection. Through robust governance frameworks, we reinforced ethical leadership across our operations.

This chapter focuses on three (3) material matters: Responsible Communication, Cyber Resilience and Good Governance.

M12 RESPONSIBLE COMMUNICATION

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M13 CYBER RESILIENCE

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

M14 GOOD GOVERNANCE

Capitals Deployed:	Stakeholders Affected:	Sustainability Impact:	Risk Category:	UNSDGs:

GOVERNANCE

Effective governance is essential to protecting stakeholder interests and ensuring long-term sustainability. It requires a holistic approach that integrates integrity, cyber security, data privacy and protection as well as responsible communication — all of which are deeply interconnected. We have established robust governance structures to uphold ethical business practices and to safeguard data while ensuring transparent communication with our stakeholders.

Good Governance

TM upholds the highest standards of integrity, with strong leadership guiding ethical business practices. TM's MC chaired by the GCEO will convene at least bi-annually with limited members from the Legal Strategy & Intellectual Property (LSIP), Group Integrity and Governance (GIG), GHCM and Risk Management divisions to provide strategic oversight on integrity, governance and compliance, prior to the matter being reported to the Board Audit Committee (BAC).

In 2024, the limited members of TM's MC convened four (4) times to review and discuss the quarterly initiatives and activities involving ethics and integrity matters.

Ethics and integrity are further reinforced by various divisions:
- **GIG** oversees corruption-related investigations and integrity education initiatives. GIG rigorously evaluates our anti-corruption frameworks, including the TM OACP and TM ABMS, bolstered by regular training, communication and thorough investigations. These are complemented by continuous internal and external audits and a strong whistle-blowing system.
- **Risk Management** maintains a risk register for integrity breaches.
- **GHCM** enforces consequence management for corruption-related offences.
- **LSIP** ensures alignment and compliance with legal and ethical standards including the PDPA 2010, Personal Data Protection (Amendment) Act 2024 and Cyber Security Act 2024. Review of statutory changes to the amended Acts and New Acts are also conducted to identify changes and impact to TM and importantly to maintain ongoing compliance.

ETHICAL BUSINESS – RESPONSIBLE CONDUCT

This multi-layered governance structure ensures a culture of accountability, with clear policies, training and enforcement mechanisms to uphold ethical business conduct.

Regular audits and reviews are conducted by *Institut Piawaian dan Penyelidikan Perindustrian Malaysia* (SIRIM) to evaluate compliance to the international standard ISO37001:2016 and its effectiveness to prevent, detect and respond to corruption-related risks in the organisation.

TM does not engage in political contributions or charitable donations as a means to avoid bribery or corruption. We adhere strictly to our CBE, which aligns with our commitment to anti-corruption and anti-bribery principles.

The TM CBE Provision 1.3 Responsibility & Compliance to the Code item 1.3.1. requires that TM's Board, Management, Employees and Business Partners must:
- Understand and comply with the Code;
- Ensure subordinates understand and comply with the Code;
- Portray and exercise good ethical values;
- Be aware of the changes and amendments of the Code and;
- Be accountable for behaviours of subordinates for failing to comply with the Code and other applicable policies, procedures, guidelines, directives, rules and practices.

Finally, TM does not reward or offer any incentives for governance matters as the Group expects full compliance without exception.

(IR) Refer to TM's website for more information on TM CBE (tm.com.my/ethics-integrity).

Cyber Resilience

In an increasingly interconnected digital world, cyber security, data privacy and protection is fundamental in ensuring business resilience. TM's cyber security governance spans strategic planning, cyber security risk management and operational controls to protect data and mitigate cyber threats.

With data leakage concerns on the rise and the need for awareness on protecting personal information continues to increase, TM places paramount importance on Data Privacy and Protection through structured governance and data protection efforts including internal policies and continuous awareness throughout the Company.

Governance and Oversight

Cyber security is embedded across TM's governance platforms to ensure accountability at all levels.

Board Oversight	The Board, supported by the BRIC meet on a quarterly basis, reviews cyber security risks and ensures alignment with TM's long-term sustainability strategy. Both oversee our cyber security measures, integrating a comprehensive ERM framework to identify, assess and monitor cyber security.
Leadership Accountability	The Chief Information Security Officer (CISO) leads our cyber security strategy, reporting directly to the GCEO. Corporate Compliance, led by Group General Counsel (GGC), ensures compliance with data privacy regulations that govern TM's data management policies.
Data Governance Council (DGC)	The DGC is accountable for data governance operations in TM, including ensuring policies and standards related to data management are defined and implemented. The DGC is supported by advisors from LSIP, Group Information Security (GIS), Risk Management and GITD to advise on privacy, security, risk and technology related topics.
Operational Safeguards	The Data Stewards, appointed by each division, ensure enforcement of Data Governance Policy.

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Data Privacy & Protection

We ensure strict compliance with the PDPA 2010 and strengthen data protection through the Data Governance Operating Model. TM has updated its Privacy Notice to align with changes in the law to ensure that data privacy and protection are embedded within our overall operational risk and compliance structures. The TM Analytics Steering Committee (TASC) — comprising of key executives such as the CISO, Group Data Privacy Officer (GDPO) and Chief Information Officer (CIO) — provides strategic oversight and ensures data governance across the Group.

Our cyber security governance is built on a foundation of strategic planning, execution and continuous evaluation, aimed at strengthening our governance, compliance, risk management and operational controls. The Board, supported by the BRIC, provides an oversight of our cyber security measures. These measures are integrated within a comprehensive ERM framework that enable us to identify, assess and monitor cyber security risks, while ensuring alignment with our commitment to sustainability.

Resilience & Accountability

To ensure a **consistent and effective** approach to information security, TM continues to enhance its internal policies, response frameworks and escalation processes:
1. **Incident Response Readiness:** TM conducts cyber security exercises annually involving internal stakeholders and a joint external stakeholder, to strengthen our response capabilities. This includes simulated security incidents, vulnerability identification and post-incident reviews. Additionally, Red Teaming exercise was conducted to test ability to prevent, detect and mitigate simulated attacks.
2. **Defined Escalation Process:** *Warga TM* are encouraged to report cyber security threats and suspicious activities via socsirt@tm.com.my, ensuring a structured response mechanism.
3. **Employee Accountability:** Cyber security is a key element of performance evaluation at TM. Employees who are responsible for security breaches, including unauthorised access or credential misuse, are subject to disciplinary action under TM's policies.

Responsible Communication

Transparent, ethical and responsible communication is integral to good governance. TM's Strategic Communications (SC) ensures that all internal and external messaging adheres to the TM Group Communication Policy, upholding the highest standards of integrity, transparency and accountability. By fostering transparent and accurate communication, TM strengthens stakeholder trust and reinforces its commitment to ethical business practices.

SC reports to the CCO, who in turn reports to the GCEO, ensuring that corporate messaging is aligned with TM's strategic priorities and governance principles at the highest level. Through a structured, consistent and transparent communication approach, TM promotes informed decision-making, enhances stakeholder confidence and upholds its role as a responsible corporate citizen.

Policies & Frameworks

To ensure regulatory compliance, protect stakeholder interests and uphold accountability and transparency, we have established a comprehensive set of policies across key governance areas.

A thorough set of documentation has been developed to guarantee the highest levels of integrity. By addressing ethical conduct, anti-corruption and confidential reporting procedures (including whistleblowing), sponsorship guidelines and the overall compliance management system, these documents show TM's dedication to moral and open business practices. We have compiled a list of policies and frameworks based on three (3) material matters.

Policies and Frameworks for Responsible Conduct

Good Governance	Cyber Resilience	Responsible Communication
• TM CBE • Anti-Corruption Policy • Whistleblowing Policy & Reporting • TM Integrity Pact • TM ACG • TM Corporate Compliance Policy • TM Sponsorship Management Guidelines (TM SMG) • Procurement Ethics • TM ABMS Manual • TM OACP	• TM Cyber Security Framework • TM Cyber Security Baseline • TM Cyber Security Statement • TM Information Security Policy • TM Data Privacy & Protection Policy (TMD3P) • TM Data Governance Policy & Framework (TMDGPF)	• TM Group Communication Policy • Stakeholder Engagement Statement • TM Privacy Notice

ETHICAL BUSINESS – RESPONSIBLE CONDUCT

Cyber Resilience

We are dedicated to maintaining the highest level of cyber security and data protection, supported by a robust policy framework and internationally recognised certifications. Our detailed policies, procedures and guidelines are designed to ensure consistency and clarity and are readily accessible to all employees at TM. This collaborative approach reinforces our collective responsibility and commitment to securing our digital ecosystem.

TM Data Privacy & Protection Policy (TMD3P)
- Provides guidelines for processing of personal data including but not limited to data collection, use, storage, security and its disclosure to ensure TM's compliance with the PDPA 2010.

TM Data Governance Policy & Framework (TMDGPF)
- Offers comprehensive guidelines to promote awareness, responsibility and best practices relating to the governance of TM's data.

Information Security Policy
- Sets the foundation for securing information assets.

PCI DSS Compliance
- Maintains Payment Card Industry Data Security Standard (PCI DSS) for the secure processing of cardholders' data, particularly for TM's Payment Gateway (PG) System.

Business Continuity Assurance
- Implements a Business Continuity Management System (BCMS) for the NIC and Security Operations Centre (SOC) to ensure continuous operations while enhancing the effectiveness of cyber threat detection.

Certified Information Security Management System
- Ensures robust information security management with ISO/IEC 27001 certification across critical TM operations such as GIS, GITD, GNT (NIC) and TM One (MERS 999 and Cloud Alpha).

Cloud Security & Privacy Certifications
- Maintains stringent security and privacy standards through TM One Cloud Alpha's continuous certification in ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, PCI DSS and ISO/IEC 27701.

To strengthen enforcement, we have established the Personal Data Protection Task Force (PDPTF), to oversee privacy impact assessments, breach management and compliance checks to safeguard personal data across all operations.

We also extend our data privacy commitments to vendors, suppliers and contractors through our Sustainable Supply Chain Policy, ensuring compliance across the value chain. Initiatives such as the TM Supplier Convention further reinforce cyber security awareness within our ecosystem.

Responsible Communication

TM upholds responsible communication through clear policies that prioritise transparency and data ethical engagement. These measures ensure that interactions with customers and stakeholders remain trustworthy, inclusive and aligned with industry standards.

TM Privacy Notice
- Adheres to the Department of Personal Data Protection (DPDP) guidelines on Privacy Notice (PN), raising employee awareness on personal data protection, with customer queries and complaints handled through TM's official channels.
- Reflects a quick overview of how TM collects, processes and protects personal data, ensuring compliance with the PDPA 2010 through the PN infographic on TM's website.

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STRATEGY AND APPROACH

Having a strong strategic direction is key to driving long-term growth, ensuring resilience and aligning business objectives with evolving market demands and stakeholder expectations.

Strategic Approach to Responsible Conduct

Good Governance: Responsibility and Transparency	Cyber Resilience: Cyber Security & Data Privacy and Protection	Responsible Communication: Clear and Consistent

Strategic Approach	What We Do
1. **Good Governance: Responsibility and Transparency**	• Cultivate a culture of integrity and compliance across all levels of the company.
2. **Cyber Resilience: Cyber Security & Data Privacy and Protection**	• Safeguard the privacy and security of our stakeholders and protect our systems and data from emerging threats.
3. **Responsible Communication: Clear and Consistent**	• Foster clear, transparent, timely and accurate communication to strengthen stakeholders' trust.

RISKS & OPPORTUNITIES

Strong corporate governance safeguards business integrity, financial stability and stakeholder trust. Poor governance can lead to financial losses, regulatory breaches and reputational damage, while effective governance enhances resilience, efficiency and investor confidence.

To mitigate corruption risks, TM records all identified risks in Management of Enterprise Risk, Compliance, Insurance, Incident and Information Security System (MERCIS) a dedicated platform for tracking and monitoring governance risks. Each division documents existing controls, with additional safeguards incorporated into the OACP and reviewed quarterly for effectiveness.

By leveraging MERCIS and adhering to the Corruption, Integrity and Governance Risk Register Guideline, TM ensures systematic risk assessment, transparency and accountability, reinforcing ethical business practices and long-term sustainability.

ETHICAL BUSINESS – RESPONSIBLE CONDUCT

Risk Category:

Risks	Strategic Approach
• **Corruption and Bribery**: Rampant cases could erode stakeholder confidence and cause legal concerns	
• **Cyber Threat Incidents**: Increasing sophistication of cyber attacks and data unavailability due to system failures or external attacks	
• **Unauthorised Access**: Weaknesses in access controls, particularly obsolete systems and misconfigured cloud environments	
• **Data Exposure:** May lead to loss of customers' trust and regulatory action	
• **Lack of Clear Communication:** Misinformation and inconsistent messaging across stakeholder channels which may lead to reputation damage	

Opportunities	Strategic Approach
• **Strong Transparency and Ethics Programmes:** Build trust with stakeholders to enhance the company's reputation	
• **Increased Investment in Advanced Cyber Security Infrastructure:** Reduce the likelihood of successful cyber attacks and system downtimes through proactive threat detection systems	
• **Address Weakness in Access Controls**: Enhance system security to mitigate potential risks	
• **Strong Data Privacy Protocols:** Maintain customer trust and safeguard sensitive information through regulatory compliance	
• **Build Stakeholder Trust and Confidence:** Clear, consistent and transparent communication channels can help to prevent misinformation	

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METRICS & TARGETS

We track key metrics and targets and their progress to ensure accountability, continuous improvement and alignment with TM's sustainability agenda.

Key Highlights

Good Governance: Progress on Implementations and Compliance

100% Completion of the ABMS certification

Reached **89%** progress in the implementation of the five-year OACP

65% of operations assessed for corruption and TM has consistently evaluated our operations to identify and assess corruption risks

100% Compliance in the submission of Declaration of Assets and Interests by all employees

1,850 Employees received training on anti-corruption

93% Compliance with operating laws and regulations based on 69 Acts applicable to TM's business

Responsible Communication

RM26.1 million in Media Value Index (MVI) was generated through news releases and corporate statements that delivered timely updates and key developments, ensuring clear and effective communication with stakeholders

Digital Communications:
– **1,604** Social media postings
– TM Blog: **31 articles**

Share of Voice:
Achieved **44%** average compared to 40% in 2023

ETHICAL BUSINESS – RESPONSIBLE CONDUCT

What We Did

GOOD GOVERNANCE: RESPONSIBILITY AND TRANSPARENCY

Programme	What We Did
Organisational Defence Against Corruption	Established TM's OACP based on thorough analysis of both internal and external sources to identify corruption-related risks and their root causes. This initiative strengthens controls and monitoring of Corruption, Integrity and Governance risks, ensuring compliance with Section 17A of MACC Act 2009. **Value Created in 2024:** ➔ 110 action plans recorded based on risk assessment. ➔ 89% progress in the five-year implementation plan of OACP.
International Standards in Anti-Bribery Compliance	TM upholds internationally recognised ISO 37001: ABMS standards to prevent, detect and address bribery risks. The framework is continuously refined to remain relevant in our dynamic business environment. **Value Created in 2024:** ➔ 17 ABMS coordinators appointed across divisions. ➔ 68 ABMS Certified Lead Auditors trained to uphold compliance. ➔ Maintained 100% certification compliance.
Ethics & Anti-Corruption Training	TM cultivates a culture of ethics and compliance by equipping employees and business partners with essential knowledge of anti-corruption laws, TM's CBE and whistle-blowing policies. Training covers key regulations such as Section 17A of the MACC Act 2009 and the No Gift Policy to reinforce ethical decision-making. **Value Created in 2024:** ➔ 1,850 employees trained in ethical business conduct through the physical Reaching Out programme physically across 10 states. ➔ 4,661 business partners engaged in TM's anti-corruption policies. ➔ One (1) contract termination involving a business partner due to corruption violations. ➔ Communicated the anti-corruption policies and procedures to more than 16,000 employees on a quarterly basis. ➔ A total of 17,564 employees completed CBE e-Learning training.
Mandatory Integrity Pledge (IP)	To reinforce ethical business practices, all employees and business partners must sign the Integrity Pledge (IP) upon registration (new and renewal), tender submission and contract establishment. Developed in collaboration with GP, this ensures strict adherence to TM's zero-tolerance stance on corruption. **Value Created in 2024:** ➔ 724 new suppliers and 1,428 suppliers renewing their supplier registration signed the IP. ➔ 18,131 employees signed the IP.
Integrity Day 2024	TM's Integrity Day 2024, themed 'Uncompromising Integrity', brought together employees, business partners and key stakeholders to reinforce ethical leadership and corporate governance. **Value Created in 2024:** ➔ TM's GCEO with Board, TM Management and employees made a public Corruption-Free Pledge (*Ikrar Bebas Rasuah*), witnessed by the Chief Commissioner of the Malaysian Anti-Corruption Commission (MACC).

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Programme	What We Did
Thought Leader in Governance & Integrity	TM collaborates with regulators, industry peers and academia to promote ethical business practices. Knowledge-sharing sessions were conducted with Integrity and Governance Unit from leading organisations, including: • *Kumpulan Wang Simpanan Pekerja* (KWSP); • *Kumpulan Wang Persaraan (Diperbadankan)* (KWAP); • MACC; • Malaysian Industrial Development Finance Berhad (MIDF); • Prasarana, PETRONAS, Cyberview, TNB and the Fire and Rescue Department of Malaysia and; • University students, instilling ethical leadership among future professionals. TM's Integrity webpage (www.tm.com.my/ethics-integrity) is also accessible by the public. **Value Created in 2024:** ➲ Conducted three (3) knowledge-sharing sessions with Cyberview, MACC and PETRONAS.
Strengthening Board Independence & MCCG Compliance	TM continuously enhances our governance beyond regulatory requirements by aligning with the MCCG. **Value Created in 2024:**

MCCG Compliance (Required Practices)	2020	2021	2022	2023	2024
MCCG Compliance	32	43	43	43	43
TM Application	31	43	43	42	42

Addressing non-compliances:
1. Board Composition Update: As reported in 2023, TM did not comply with Practice 5.2, which requires a majority independent board on TM Board. However, TM complied with the said Practice by year ended 31 December 2024 when the Board composition was reviewed with the redesignation of Ahmad Taufek Omar (ATO) as an Independent Director effective 13 September 2024. ATO completed his three-year cooling-off period from management and was accordingly redesignated upon successful assessment as an independent director by the Board Nomination and Remuneration Committee (NRC) and TM Board.
2. As at 31 December 2024, the composition of women directors has reduced from 33% to 27% resulting in the non-compliance with Practice 5.9 on the requirement of at least 30% women directors. An independent search firm has been appointed to undertake the search for women directors. The ongoing search is targeted to be completed by Q2 2025.
3. Remuneration Transparency: TM does not adopt Practice 8.3 (Step Up), which requires full disclosure of the detailed remuneration of each senior management on a named basis. Instead, TM adopts Practice 8.2 where the top five (5) senior management remuneration component in bands of RM50,000 bands are disclosed on a named basis, ensuring a balance between transparency and confidentiality.

| **Enhancing Whistleblowing & Disciplinary Enforcement** | We have strengthened our compliance culture by increasing transparency in corruption reporting and enforcing disciplinary measures.

Value Created in 2024:
➲ 23 employees dismissed or disciplined.
➲ One (1) business partner's contract terminated for corruption violations.
➲ 39 reports were received, with 19 reports valid for further investigation. 18 reports were confirmed as corruption cases. We uphold the highest standard of integrity, treating every case, no matter how small, with the utmost seriousness. |

ETHICAL BUSINESS – RESPONSIBLE CONDUCT

CYBER RESILIENCE: CYBER SECURITY AND DATA PRIVACY PROTECTION	
Programme	**What We Did**
Industry Collaboration for Cyber Security Leadership	TM worked closely with Malaysia Technical Standards Forum Berhad, National Cyber Security Agency (NACSA) and DPDP to develop national cyber security codes and ensuring compliance with the Cyber Security Act 2024 and amended PDPA 2010. TM conducted a yearly cyber security audit, vulnerability assessment and penetration testing by an appointed independent third party to strengthen cyber resilience. **Value Created in 2024:** ➡ Ensured compliance to regulations.
Cyber Awareness & Workforce Readiness	We actively promote cyber security awareness through social media campaigns, phishing simulations and targeted educational programmes. Awareness initiatives covered cyberbullying, privacy protection, content safety and threat detection. Employees underwent quarterly phishing exercises, bi-weekly Cyber Safe updates and cyber security webinars to enhance their vigilance. **Value Created in 2024:** ➡ Successfully conducted phishing simulation to *Warga TM*. ➡ Met our SLA target of cyber security services.
Strengthening Vendor Cyber Security Compliance	TM reinforced cyber security risk management across its supply chain by embedding security requirements into technical and contractual terms. This ensures vendors comply with TM's security governance framework, reducing external risk exposure. TM continues to assess vendor security posture via Vendor Security Index. **Value Created in 2024:** ➡ Strengthened relationships, improved incident response and ensured stronger compliance.
Embedding Security & Privacy into Digital Infrastructure	Implemented Application Security Testing and Penetration Testing into development, securing business and personal data before deployment. **Value Created in 2024:** ➡ Enhanced trust and ensured compliance.
Advanced Security Technologies & Threat Prevention	Committed to continuously improving our cyber security maturity through key measures in our Cyber Security Baseline, covering areas like governance, identity management and vulnerability management. We focus on enhancing threat visibility, integration and automation to reduce exposure and strengthen data protection. Additionally, Red Teaming exercise was conducted to test ability to prevent, detect and mitigate simulated attacks. **Value Created in 2024:** ➡ Enhanced trust and ensured compliance.
Incident Response Procedures	TM conducted cyber security drill exercises to stress-test contingency plans, ensuring rapid and effective response to cyber incidents. These drills were conducted to ensure cyber resilience in mitigation cyber threats. Scenarios included ransomware attacks and cloud infrastructure attacks. **Value Created in 2024:** ➡ Strengthened TM's incident response measures.

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Programme	What We Did
TM Cyber Security Month & Day	Launched the Cyber Security Month, featuring a series of forums, webinars and interactive activities aimed at equipping TM staff with knowledge on cyber security and AI, strengthening TM's cyber security resilience. This is a collaboration event between CX, GNT, GITD and GIS. **Value Created in 2024:** → >4,000 employees reached through these awareness initiatives.
Personal Data Protection Task Force (PDPTF)	Formation of Personal Data Protection Task Force to effectively execute personal data protection control implementations throughout TM. **Value Created in 2024:** → PDPTF consists of members from 13 divisions and one (1) subsidiary of TM to handle personal data. → Appointed 30 dedicated members as single point of contact on personal data matters.

RESPONSIBLE COMMUNICATION: CLEAR, CONSISTENT AND TIMELY	
Initiatives	**What We Did**
Strengthening Engagement & Trust	Prioritised responsible and strategic communication across various channels, such as: • Regular media briefings and news releases on financial performance, strategic initiatives, business prospects and market guidance to ensure timely, accurate information dissemination. • Consistent updates on TM's financial results, new product launches, partnerships and key initiatives, keeping stakeholders well-informed about the Group's latest developments. • Clear communication through social media, TM's corporate website and targeted online campaigns, ensuring accessibility and responsiveness to stakeholder inquiries. **Value Created in 2024:** → Strengthened corporate reputation and brand perception through strong message alignment. → Elevated TM's thought leadership through strategic media interviews and proactive engagement, positioning key spokespeople as credible voices in the industry. → Enhanced stakeholder engagement through timely, transparent and accessible communication across various channels. → Supported business growth by shaping favourable narratives around TM's transformation, strategic direction and expansion into new areas such as data centres, AI and GPUaaS. → Published impact-driven stories that highlight TM's contributions to community development.
Diverse Stakeholder Expectations	Developed and executed customised communication strategies for each stakeholder group, ensuring that messaging was specifically crafted to address distinct interests, concerns and priorities. **Value Created in 2024:** → Expanded reach and engagement by integrating diverse channels, including social media and the TM Blog and key media organisations. → Conducted physical and hybrid leadership townhall sessions with all *Warga TM* nationwide, to share the Group's latest developments.
Regulatory Complexity	Regularly engaged with the Ministry of Communications and the Ministry of Digital through structured discussions/meetings, dialogue sessions and strategic forums to promote regulatory transparency, enhance compliance and strengthen industry collaboration. **Value Created in 2024:** → Fostered transparency, compliance and collaboration through government engagement.

ETHICAL BUSINESS – RESPONSIBLE CONDUCT

Initiatives	What We Did
Enhanced Crisis Communication Preparedness & Crisis Response Coordination	Revamped processes to align with BCM standards, strengthening stakeholder trust during crises. **Value Created in 2024:** ➲ Developed Crisis Communications Manual, outlining crisis scenarios, activation processes and communication protocols. ➲ Participated in BCM's Tabletop Exercises (TTX) to simulate crisis scenarios, which enhanced our ability to manage communications effectively during crises.
Strengthening Internal Ties	Refined internal engagement strategies through: • **Email Optimisation:** Optimised email communications to minimise overload and highlight key, impactful content. • **Boost Internal Awareness of Viva Engage:** Encouraged staff to actively use the Viva Engage platform to enhance internal communication and employee engagement. • **Messaging Clarity:** Improved communication clarity through visuals, driving better understanding and increasing internal engagement. • **Collaborative Content Creation:** Led content co-creation efforts with over ten (10) divisions. • **Leadership Communication:** Leveraged leadership videos to personalise messages, reinforcing company values and ensuring alignment with TM's vision. **Value Created in 2024:** ➲ Improved understanding and increased internal engagement, leading to enhanced information retention and a more efficient flow of communication across teams. ➲ Ensured close alignment of our communication strategies to deliver cohesive and consistent messages throughout the year and raise awareness of key initiatives.
Advancements in Public Communication	Strengthen our public communication approach to enhance transparency, credibility and stakeholder trust. Efforts were centred on strategic information delivery and leadership visibility, contributing to stronger corporate positioning and message clarity. • **Strengthened Governance in News Releases:** Instituted a rigorous review process for all news releases, endorsed by the GCEO, ensuring consistent quality, message alignment and accountability in corporate disclosures. • **Amplified Thought Leadership:** Increased the publication of expert insights and industry perspectives to elevate TM's voice on sustainability, innovation and digital transformation — reinforcing our leadership role in shaping industry discourse. • **Enhanced Media Readiness:** Equipped TM leaders with strategic media engagement capabilities, enabling them to confidently and consistently represent the Group's priorities and values across various public platforms. **Value Created in 2024:** ➲ Issued strategic news releases featuring timely business updates as well as leadership insights and messaging from the GCEO and LOB leaders. ➲ Delivered targeted media training for the GCEO, C-suite executives and State liaison officers, building organisational readiness and ensuring strong, unified messaging across all levels.

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CALL TO ACTION

As TM continues to evolve, we are reinforcing our approach in addressing the following key areas:

1. **Good Governance:** To uphold the highest standards of integrity, TM will conduct an independent Business Integrity Survey (BIS) to assess employee and supplier perceptions of ethics and corporate governance, identifying areas for improvement. Additionally, an Adequate Measure Assessment under Section 17A of the MACC Act 2009 will evaluate TM's governance structures and anti-corruption measures.

   We will also enhance the Ethics Line Reporting System, improve Code of Conduct training, appoint ethics ambassadors, strengthen risk evaluations and streamline corporate policies. These measures reinforce a culture of ethical leadership and accountability.

2. **Cyber Resilience:** We will ensure full adherence to key regulatory frameworks, including the Cyber Security Act 2024 and the Personal Data Protection (Amendment) Act 2024. These efforts will reinforce our leadership in cyber security governance, proactively mitigating risks while safeguarding sensitive information.

   TM will continue to strengthen our controls to minimise risk against cyber threats including emerging threats.

   Looking ahead, we are not just strengthening our internal controls; we are fostering a pervasive security culture. Every *Warga TM* plays a crucial role in safeguarding data and we are committed to continuous awareness and education to ensure that responsibility is embedded at every level of our organisation.

3. **Responsible Communication:** TM will continue to strengthen brand presence, corporate messaging and stakeholder engagement by expanding corporate profiling efforts to highlight sustainability and innovation milestones.

   By delivering consistent, accurate and meaningful messaging across news releases, media briefings, social media and internal communication channels, we aim to build stronger connections with stakeholders while reinforcing TM's position as a trusted industry leader.

SUSTAINABILITY PERFORMANCE
FROM BURSA MALAYSIA ESG REPORTING PLATFORM

Indicator	Measurement Unit	2020	2021	2022	2023	2024
Environmental management						
Total costs of environmental fines and penalties during financial year	MYR	0.00	0.00	0.00	0.00	1,000.00
Investment in climate adaptation measures	MYR	-	-	-	-	497,412.00
Percentage of the company's total data centres portfolio in Malaysia certified to a recognized building management standard for property such as LEED and GBI	Percentage	-	-	-	-	50.00
Bursa (Energy management)						
Bursa C4(a) Total energy consumption	Megawatt	448,141.00 *	428,261.60 *	430,414.10 *	429,102.00	420,913.00
Three years of total energy usage data on properties disclosed	Megawatt	-	-	1,306,816.70 *	1,287,777.70 *	1,280,429.10
Bursa (Emissions management)						
Bursa C11(a) Scope 1 emissions in tonnes of CO2e	Metric tonnes	11,531.00	10,997.00	10,802.00	9,431.00	8,763.00
Bursa C11(b) Scope 2 emissions in tonnes of CO2e	Metric tonnes	372,853.00	324,612.00	305,785.00	286,450.00	257,807.00
Bursa C11(c) Scope 3 emissions in tonnes of CO2e (at least for the categories of business travel and employee commuting)	Metric tonnes	38.00	9.00	15.00	751.00 *	799.00
Three years of total GHG emissions data on properties disclosed	Metric tonnes	-	1,099,954.00 *	1,036,642.00 *	948,852.00 *	880,603.00
Scope 3 emissions in tonnes of CO2e - Business travel	tCO2-e	36.00 *	7.00 *	11.00 *	3.00 *	12.00
Scope 3 emissions in tonnes of CO2e - Employee commuting	tCO2-e	-	-	-	21,131.00 *	21,179.00
Bursa (Waste management)						
Bursa C10(a) Total waste generated	Metric tonnes	451.10	468.40	1,015.00	1,442.40 *	1,512.60
Bursa C10(a)(i) Total waste diverted from disposal	Metric tonnes	-	232.60 *	3,322.40 *	3,279.00 *	2,950.00
Bursa C10(a)(ii) Total waste directed to disposal	Metric tonnes	451.10	468.40	1,015.00	1,442.40 *	1,512.60
Bursa (Water)						
Bursa C9(a) Total volume of water used	Megalitres	228.500000	221.600000	179.400000	131.500000	132.000000
Three years of total water withdrawal data is disclosed by source - Municipal potable water	Cubic meters	-	-	629,500.00 *	532,500.00 *	442,900.00

Internal assurance   External assurance   No assurance   (*)Restated

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Indicator	Measurement Unit	2020	2021	2022	2023	2024
Bursa (Community/Society)						
Bursa C2(a) Total amount invested in the community where the target beneficiaries are external to the listed issuer	MYR	34,801,840.00	47,106,210.00	37,387,484.00	38,354,335.00	39,787,258.58
Bursa C2(b) Total number of beneficiaries of the investment in communities	Number	-	94,857	50,653	126,345	95,610
Bursa (Labour practices and standards)						
Bursa C6(a) Total hours of training by employee category						
Management	Hours	-	36,778 *	23,428 *	7,496	10,208
Executive	Hours	361,650 *	657,733 *	391,727 *	557,005	599,131
Non-executive	Hours	182,510 *	247,874 *	175,756 *	173,669	203,091
Bursa C6(b) Percentage of employees that are contractors or temporary staff	Percentage	4.11	4.21	4.71	4.50	4.29
Bursa C6(c) Total number of employee turnover by employee category						
Management	Number	24 *	38 *	33 *	23 *	28
Executive	Number	316 *	720 *	731 *	430 *	442
Non-executive	Number	1,245 *	967 *	813 *	508 *	255
Bursa C6(d) Number of substantiated complaints concerning human rights violations	Number	0	0	0	0	0
Maximum number of years executive remuneration is deferred	Number	0	0	0	0	0
Percentage of salary of executives to which bonuses are restricted	Percentage	0.00	0.00	0.00	0.00	0.00
Percentage of salary of other high paid staff to which bonuses are restricted	Percentage	0.00	0.00	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						
Management Under 30	Percentage	0.00	0.00	0.00	0.00	0.00
Management Between 30-39	Percentage	0.00 *	0.00 *	0.00 *	0.00 *	0.00
Management Between 40-50	Percentage	0.50 *	0.50 *	0.70 *	0.70 *	0.60

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Indicator	Measurement Unit	2020	2021	2022	2023	2024
Management Above 50	Percentage	0.40 *	0.40 *	0.50 *	0.50 *	0.50
Executive Under 30	Percentage	2.50 *	2.90 *	3.70 *	3.90 *	3.70
Executive Between 30-39	Percentage	21.20 *	21.00 *	20.90 *	19.40 *	17.30
Executive Between 40-50	Percentage	16.30 *	18.10 *	19.50 *	21.90 *	24.50
Executive Above 50	Percentage	6.50 *	6.10 *	5.90 *	6.50 *	7.10
Non-executive Under 30	Percentage	2.80 *	2.30 *	2.10 *	1.80 *	1.40
Non-executive Between 30-39	Percentage	24.50 *	24.80 *	23.80 *	22.00	19.60
Non-executive Between 40-50	Percentage	14.20 *	14.90 *	15.40 *	16.30 *	17.70
Non-executive Above 50	Percentage	11.00	9.00	7.50 *	6.90 *	7.50
Gender Group by Employee Category						
Management Male	Percentage	0.70 *	0.70 *	0.80 *	0.80 *	0.80
Management Female	Percentage	0.30 *	0.30 *	0.40 *	0.40 *	0.40
Executive Male	Percentage	24.20 *	24.70 *	25.70 *	26.50 *	26.80
Executive Female	Percentage	22.30 *	23.30 *	24.30 *	25.30 *	25.70
Non-executive Male	Percentage	36.00	34.90 *	33.40 *	32.20 *	31.80
Non-executive Female	Percentage	16.50 *	16.10 *	15.40 *	14.80 *	14.50
Percentage of global staff with a disability.	Percentage	0.05 *	0.04 *	0.05 *	0.09 *	0.09
Percentage of women in the global workforce.	Percentage	39.00 *	40.00 *	40.00 *	40.00 *	41.00
Percentage of women on the Executive committee or equivalent.	Percentage	-	31.00 *	38.00 *	47.00 *	47.00
Number of global staff with a disability	Number	11 *	8 *	9 *	17 *	16
Bursa (Health and safety)						
Bursa C5(a) Number of work-related fatalities	Number	0	2	2	0	0
Bursa C5(b) Lost time incident rate ("LTIR")	Rate	0.15	0.17	0.17	0.08	0.21
Bursa C5(c) Number of employees trained on health and safety standards	Number	453	9,785	15,116	2,829	14,053
Number of work-related employee fatalities, over last 3 years	Number	0	1 *	0	0	0
Number of work-related contractor fatalities, over last 3 years	Number	0	1 *	2 *	0	0

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Indicator	Measurement Unit	2020	2021	2022	2023	2024
Percentage of sites with OSHE - ISO 45001 certification	Percentage	0.80 *	0.80 *	0.80 *	0.80 *	0.12
Good governance						
Bursa C3(b) Percentage of directors by gender and age group						
Male	Percentage	73.00	64.00	64.00	67.00	73.00
Female	Percentage	27.00	36.00	36.00	33.00	27.00
Under 30	Percentage	0.00	0.00	0.00	0.00	0.00
Between 30-39	Percentage	0.00	0.00	0.00	0.00	0.00
Between 40-50	Percentage	18.00	18.00	18.00	17.00	18.00
Above 50	Percentage	82.00	82.00	82.00	83.00	82.00
Number of Board Directors	Number	11 *	11 *	11 *	12 *	11
Number of independent Directors on the board	Number	6 *	6 *	6 *	6 *	6
Number of women on the board	Number	3 *	4 *	4 *	4 *	3
Annual General Meeting: Number of days between the date of notice and date of meeting	Number	30 *	31 *	29 *	28 *	29
Bursa (Anti-corruption)						
Bursa C1(a) Percentage of employees who have received training on anti-corruption by employee category						
Management	Percentage	27.00 *	9.00 *	12.00 *	6.00 *	5.00
Executive	Percentage	24.00	15.00 *	16.00 *	36.00 *	13.00
Non-executive	Percentage	10.00	8.00	10.00	19.00 *	7.00
Bursa C1(b) Percentage of operations assessed for corruption-related risks	Percentage	25.00	100.00	60.00	65.00	65.00
Bursa C1(c) Confirmed incidents of corruption and action taken	Number	-	7	4	8	18
Disclosure of number of staff disciplined or dismissed due to non-compliance with anti-corruption policy/policies	Number	-	14 *	5 *	15 *	23

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SUSTAINABILITY PERFORMANCE
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Indicator	Measurement Unit	2020	2021	2022	2023	2024
Disclosure of cost of fines, penalties or settlements in relation to corruption	MYR	0.00	0.00	0.00	0.00	0.00
Responsible conduct						
Disclosure of total amount of political contributions made	MYR	0.00	0.00	0.00	0.00	0.00
Number of fines/settlements over the previous 3 years where each is valued > US $100 million	Number	0	0	0	0	0
Combined total value of fines/settlements over the previous 3 years where each is valued > US $100 million	MYR	0.00	0.00	0.00	0.00	0.00
Bursa (Supply chain management)						
Bursa C7(a) Proportion of spending on local suppliers	Percentage	74.00	77.00	77.00	74.00	76.00
Bursa (Data privacy and security)						
Bursa C8(a) Number of substantiated complaints concerning breaches of customer privacy and losses of customer data	Number	-	-	2	0	0

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