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# **BERJAYA SUSTAINABLE PROCUREMENT POLICY ver. 1.0**

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## **1. PURPOSE**

- 1.1 Berjaya Land Berhad and its subsidiaries and affiliated companies (collectively known as “The Group”) meticulously aligns its material sustainability matters towards meeting its sustainability aspirations. To reinforce our sustainability commitment, we have launched the Berjaya Sustainable Procurement Policy (“This Policy”). This Policy aims to drive positive change throughout our supply chain supporting transition to low carbon, improve resource efficiency, and ensure ethical, circular, and socially responsible suppliers. The commitments spelled out in this Policy shall be observed by The Group during the entire procurement chain and applies to all suppliers of The Group. For purpose of this Policy, “Supplier” means all third parties as well as any entities that are permitted to perform duties and functions for or provide goods and services whether directly or indirectly to The Group.

## **2. SUPPLIER CODE OF CONDUCT**

- 2.1 Compliance to the supplier code of conduct of The Group and will be thoroughly assessed. In general, suppliers are required to comply with the following set of criteria.

### **a) Business Ethics**

- i. Adhere to and respect all applicable international and domestic laws and regulations governing ethical business practices and uphold best commercial practices.
- ii. Establish and demonstrate existence of procedures to prevent:
  - Money Laundering and Terrorism Financing: Suppliers must abstain from participating in or facilitate transactions that involve funds obtained through unlawful and illicit means.
  - Anti-competitiveness: Anti-competitive behaviour that undermine fair competition.

- Corruption, Fraud and Bribery: Zero tolerance against any form of bribery and corruption in all business activities and compliance with TRUST Concept of the Group.
- Conflict of interest: Prevent situations where personal interests may compromise the integrity of business decisions.
- Personal Data Securities Issues: Ensure the protection of sensitive personal data through the office of the Data Protection Officer if applicable (i.e. customer personal information, proprietary data, business data, transaction records, services records and employee records etc.) throughout the entire chain of supply, business, trade and collection and recording of information.

## **b) Human Rights and Labour Standards**

- i. Strict adherence to Malaysia Employment Act 1955 and all such other related statutes.
- ii. Compliance to Berjaya's Human Rights and Labour Standards Policy, Berjaya's Diversity Equity and Inclusion Policy, Berjaya's Anti-Child and Forced Labour Policy.
- iii. Prohibit corporal punishment, physical abuse, and any form of inhumane or degrading treatment of their employees. Disciplinary practices must adhere to ethical and legal standards, ensuring the dignity and well-being of workers.
- iv. Provide employees with a living wage that meet or exceed the minimum living wage established by local laws or industry standards.
- v. Prohibit slavery and use of forced or child labour across supply chain.
- vi. Elimination of excessive working hours.
- vii. Ensuring there is non-discrimination and providence of equal employment opportunities.
- viii. Supports the right to freedom of association.
- ix. Supports the right to collective bargaining
- x. Compliance to health and safety standards

### **c) Environmental**

- i. Adhere to environmental regulations and best practices standard related to but not limited to pollution prevention, waste management and resource efficiency.

- 2.2 The Group retains absolute discretion to address any non-compliance by any Suppliers including but not limited to dismissal, termination of contracts, suspension of services, issuance of warning or reprimand or not renewing such services upon expiry of any contract with the said Suppliers.

## **3. GUIDING PRINCIPLES**

- 3.1 In the Supplier selection process, preference will be given to Suppliers demonstrating commitment to sustainability practices. This will be assessed based on the following criteria:

### **a) Proactive and Transparent Environmental, Social and Governance (“ESG”)**

#### **Disclosures**

- i. Disclosure through applicable platform such as company website, annual reports and sustainability statements provided always that such disclosure does not include any greenwashing or mere puff under the guise of compliance with ESG.
- ii. Establishment of their own environmental and social related metrics/targets in alignment to achieve net zero emissions or carbon neutrality.

### **b) Good Environmental Practices**

- i. Minimise environmental footprint of the goods and services over the life cycle (e.g. choosing products and services that have lower adverse impacts associated with any stage in their production, use or disposal.
- ii. Collaborate with relevant stakeholders to support supply chain decarbonisation.

- iii. Provide goods and services that are ethically-sourced.
- iv. Provide take-back service to responsibly recycle products and/or their packaging materials.
- v. Commitment to resource-efficient operations, manufacturing processes, and product design.
- vi. Consciously design procurement processes and related programming that increases environmental awareness for environmental protection.
- vii. Minimise the impact on biodiversity loss by abstaining from products and services that contribute to deforestation and biodiversity depletion.
- viii. Suppliers are advised to make a declaration if they are aware that their products consist of hazardous components and/or materials (e.g. chemicals, toxic, require special handling of waste).

**c) Upholding Human Rights and Labour Practices**

- i. Maintain a safe and healthy working environment for employees which includes but not limited to providing appropriate training, safety equipment, and procedures to prevent accidents, injuries, and occupational health issues.
- ii. Ensure that the accommodations offered adhere to local standards for acceptable living conditions, if the nature of the work necessitates the provision of housing for employees.
- iii. Support the right to freedom of association and collective bargaining.
- iv. Provide goods and services that are certified with ethical labels.
- v. Provision of Water, Sanitation and Hygiene (WASH) for employees.

#### **d) Good Governance Practices**

Employees receive annual anti-corruption and anti-bribery training and are constantly reminded of the TRUST Concept.

## **4. RESPONSIBILITIES AND REPORTING**

- 4.1 The responsibility to adhere to this Policy resides in all of our employees. The oversight of this Policy is led by the Board of Directors, Sustainability Committee (“SC”), Sustainability Working Group (“SWG”) and Central Purchasing Department. The implementation and administration of this policy is the responsibility of the management within each Business Units (“BU”).
- 4.2 Within Berjaya, there are firmly established grievance procedures and whistle blowing channels which are available to all of our employees and external parties. All whistleblowers will be accorded with protection of confidentiality of identity, be protected against any adverse and detrimental actions for disclosing any improper conduct committed.

We commit to investigate all violations of this policy through:

Whistleblowing Email: [whistleblower.bjland@berjaya.com.my](mailto:whistleblower.bjland@berjaya.com.my)

Or

Chairman of Audit Committee / Group Chief Executive Officer

Lot 13-01A, Level 13 (East Wing),

Berjaya Times Square,

No. 1, Jalan Imbi,

55100 Kuala Lumpur, Malaysia

## **EFFECTIVE DATE**

The policy was endorsed by the Board and effective as of 26 November 2025.