



SPORTS TOTO BERHAD

SUSTAINABLE PROCUREMENT POLICY

1 NOVEMBER 2025

1. INTRODUCTION

- 1.1. Sports Toto Berhad and its subsidiaries and affiliated companies (collectively known as “the Group”) affirms the Group’s commitment to conducting procurement in a responsible, transparent, and sustainable manner.
- 1.2. The enforcement of this Sustainable Procurement 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.

2. SCOPE

This policy applies to:

- 2.1. All subsidiaries, divisions, and business units within the Group.
- 2.2. All Group employees engaged in procurement, contracting, or supplier engagement.
- 2.3. All suppliers, contractors, and service providers delivering goods or services to the Group.

3. GUIDING PRINCIPLES

- 3.1. **Carbon Footprint Reduction** – Prioritise suppliers who actively measure, report, and reduce greenhouse gas (GHG) emissions.
- 3.2. **Waste Reduction** – Promote circular economy practices and resource efficiency, including use of recycled or reusable materials.
- 3.3. **Support for Local Economies** – Where commercially feasible, prioritise local suppliers and encourage engagement with SMEs, social enterprises, and diverse suppliers.
- 3.4. **Fair Labour Practices** – Uphold international labour standards, ensuring safe, equitable, and inclusive working conditions.
- 3.5. **Ethical Sourcing** – Ensure transparency and traceability in supply chains, avoiding sourcing linked to conflict, human rights abuses, or illegal activities.
- 3.6. **Transparency in Sustainability Practices** – Require suppliers to disclose ESG commitments and performance, aligned with the Group’s Supplier Code of Conduct.

4. SUPPLIER REQUIREMENTS

The Group requires all suppliers to comply with the following minimum standards (detailed in the Supplier Code of Conduct):

- 4.1. **Legal & Ethical Conduct** – Compliance with laws; prohibition of bribery, corruption, money laundering, terrorism financing, and unfair competition.
- 4.2. **Conflict of Interest** – Disclosure and management of actual or potential conflicts.
- 4.3. **Confidentiality & Data Protection** – Safeguarding of the Group’s confidential and proprietary information and compliance with data privacy laws.
- 4.4. **Human Rights & Labour** – Prohibition of forced or child labour, respect for fair wages, safe working conditions, non-discrimination, and freedom of association.
- 4.5. **Health, Safety & Environment** – Compliance with occupational safety and environmental laws; minimisation of environmental impact.

5. RESPONSIBILITIES AND REPORTING

- 5.1. 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”), the Sustainability Working Group (“SWG”) and the Head of Procurement / Purchasing (where applicable). The implementation and administration of this policy is the responsibility of the management and Heads of Departments (HODs) within each Business Units (“BU”).

6. MONITORING AND ENFORCEMENT

- 6.1. Supplier compliance may be assessed through due diligence, self-declarations, audits, or other verification methods.
- 6.2. Non-compliance with this Policy or the SCOC may result in corrective action, contract suspension, or termination.
- 6.3. Within Sports Toto Berhad, 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 our:

Whistleblowing Email: whistleblower.sptoto@berjaya.com.my

Or

Chairman of Audit Committee/ Chief Executive Officer

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

Berjaya Times Square,

No.1, Jalan Imbi, 55100 Kuala Lumpur.

7. EFFECTIVE DATE & REVIEW

- 7.1. The policy was endorsed by the Board and effective as of 1 November 2025.
- 7.2. This Policy shall be reviewed periodically to ensure alignment with the Group's strategic objectives, sustainability commitments, and regulatory developments.