



# **SUSTAINABILITY FRAMEWORK AND POLICY**

**THRIVEN GLOBAL BERHAD**

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## 1.0 Introduction

This Sustainability Framework (the “Framework”) outlines Thriven Global Berhad’s (“Thriven” or the “Group”) steadfast dedication to embedding sustainability into every facet of our operations and business strategies. Aligned with the United Nations Sustainable Development Goals (“UN SDGs”), it underscores our proactive approach to fostering a sustainable future, where responsible economic, environment, social and governance (“EESG”) practices drive long-term value for our stakeholders and society as a whole.

The Framework is designed to:

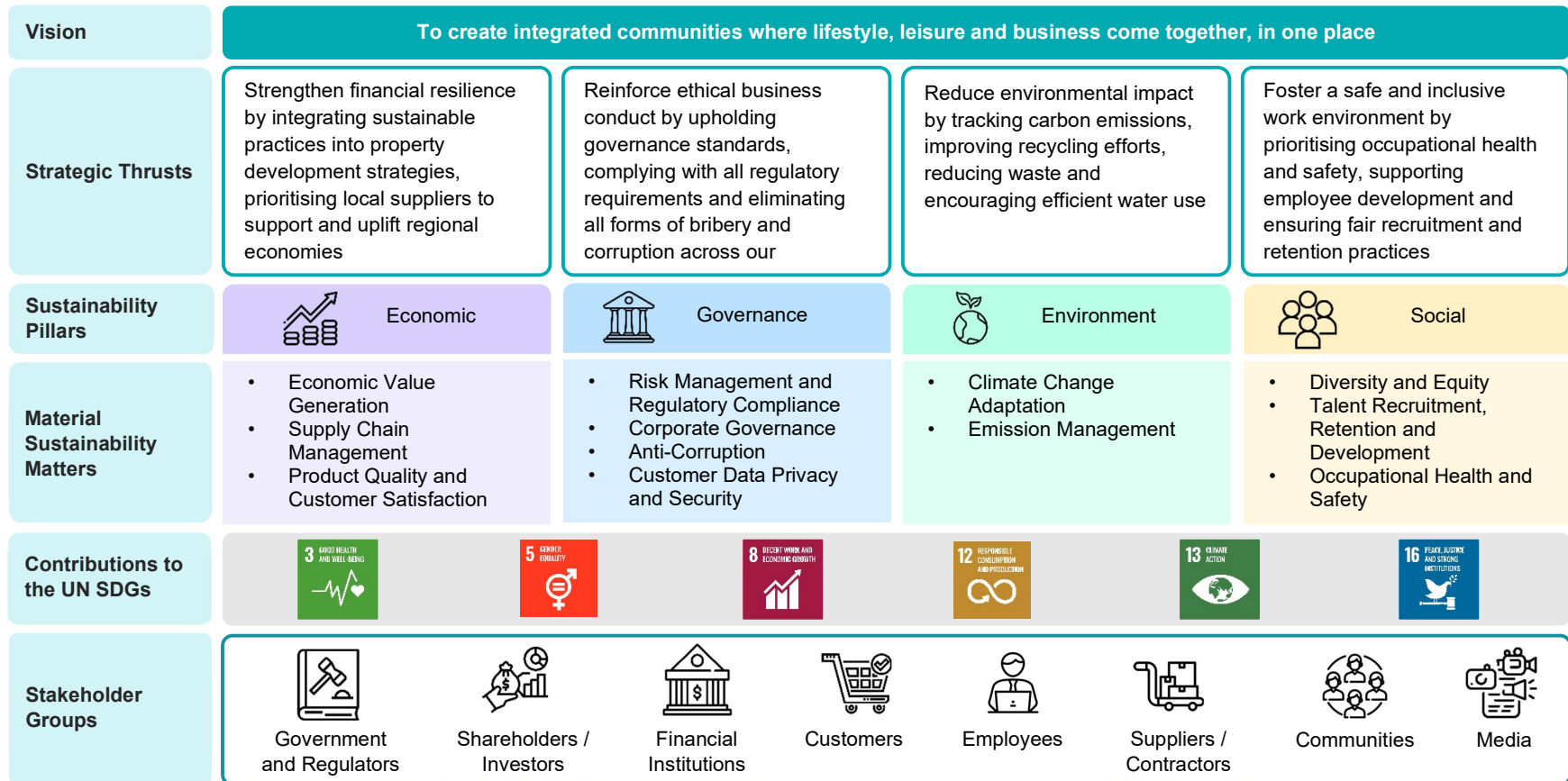
- Establish a robust methodology for integrating sustainability into operational and strategic decisions;
- Cultivate transparency and foster trust through governance practices and reporting mechanisms;
- Enhance environmental stewardship by embracing sustainable resource management practices and minimising waste and emissions; and
- Bolster social impact by focusing on health, safety, diversity and community engagement.

The Sustainability Policy (the “Policy”) complements the Framework by detailing specific EESG commitments. As outlined in the terms of reference, our governance structure ensures effective oversight and accountability in achieving our sustainability objectives.

Together, the Sustainability Framework and Policy form a cohesive and strategic approach for realising our EESG ambitions. They ensure that our initiatives are aligned with our core values and mission, empowering us to achieve impactful results for our stakeholders while making a meaningful difference in the communities we serve.

## 2.0 ESG Strategy

Thriven’s ESG Strategy reflects our commitment to creating sustainable value by focusing on four core pillars: Economic, Governance, Environment and Social. These pillars are shaped by our strategic priorities and address key material sustainability matters, ensuring a targeted and impactful approach. Our ESG Strategy also underscores our alignment with eight selected UN SDGs, reinforcing a holistic strategy that integrates economic sustainability, robust governance, environmental stewardship and impactful community engagement into every aspect of our operations.



### 3.0 Sustainability Policy

#### 1. OVERVIEW

This Policy defines Thriven's core sustainability principles and commitments, offering guidance for embedding sustainable practices across its operations and value chain while aligning with the Group's commitment to the UN SDGs.

#### 2. OBJECTIVE

The objectives of this Policy are to:

- Serve as the overarching policy covering ESG principles
- Outline the key principles for managing our sustainability strategies, ensuring they meet stakeholder expectations
- Promote and cultivate integrity, transparency and credibility within our sustainability efforts to improve our business decisions and operations
- Integrate ESG considerations into our business practices to ensure long-term value creation

#### 3. OUR PRINCIPLES

The Policy defines our sustainability commitments which are categorised into four pillars, namely Economic, Governance, Environment and Social.

##### Economic

To achieve long-term business sustainability through consistent and strong financial performance, we aim to:

- Maintain a competitive and professional business environment, providing quality products and services through continuous improvement
- Implement business continuity planning to minimise disruptions while ensuring compliance with laws, regulations and industry practices

##### Governance

The Group is committed to the highest standards of corporate governance and integrity, with a zero-tolerance policy towards all forms of corruption. To uphold this commitment, we strive to:

- Promote corporate governance best practices as outlined in the latest Malaysian Code on Corporate Governance ("MCCG")
- Operate with the highest level of integrity and prevent all forms of corruption, bribery and unethical business conduct
- Adhere to established policies and procedures that promote ethical behaviour and cultivate a culture of accountability across the Group

- Strictly comply with laws, regulations and industry standards relevant to our operations by regularly assessing our compliance mechanisms and updating policies as needed to meet evolving legal requirements
- Maintain transparent and open communication with stakeholders to ensure the disclosure of accurate information regarding our sustainability practices, performance and goals

#### Environment

To promote responsible environmental stewardship and minimise our impact on climate change, we aim to:

- Continuously improve energy efficiency to reduce our carbon footprint and actively monitor and disclose our carbon emissions
- Design and develop with sustainability in mind, aiming to achieve environmentally sustainable design certifications for all relevant projects
- Promote the efficient and responsible consumption of energy, water and materials in our daily operations
- Promote water conservation practices throughout the Group

#### Social

We place the health and well-being of our employees and the communities we serve at the core of our business operations. To continuously enhance our social performance, we will:

- Build trust and long-term relationships with our customers, focusing on enhancing customer-centric experiences
- Prioritise the health, safety and well-being of our employees by implementing stringent safety guidelines and protocols in line with occupational health and safety laws, regulations and standards
- Foster a culture of learning and promote equity and fairness among employees to maximise their potential
- Promote a culture of diversity and inclusion by implementing fair labour practices that offer equal opportunities and eliminate discrimination
- Engage in community development initiatives tailored to have a positive impact on local communities

#### **4. APPLICABILITY**

The Policy is applicable to all employees of the Group, as well as external parties including our vendors, suppliers and contractors. We encourage all employees to adhere to the commitments set forth in this Policy.

This Policy makes reference to, and should be read together with Thriven's other relevant codes and policies:

- Anti-Bribery and Corruption Policy
- Whistleblower Policy
- Code of Conduct and Ethics
- Directors' Fit and Proper Policy
- Board Charter
- Safety and Health Policy

#### **5. ADOPTION AND REVIEW**

The Policy was adopted by the Board on 15 April 2025.

The Sustainability Steering Committee ("SSC") will evaluate and propose updates to this Policy to the Board of Directors (the "Board") for consideration and approval as needed.

## 4.0 Sustainability Governance Structure Terms of Reference

### 1. OBJECTIVE

The sustainability governance structure supports the Board in fulfilling their statutory and fiduciary responsibilities. It ensures effective oversight of sustainability practices and their integration into the Group's operations, maintaining accountability and alignment with the Group's sustainability objectives.

### 2. SUSTAINABILITY GOVERNANCE

The Board provides strategic direction and oversight of sustainability-related matters, supported by the SSC and the Sustainability Working Committee ("SWC"). Led by the Group Managing Director, the SSC is responsible for establishing and aligning sustainability initiatives with the Group's overall objectives. The SWC, comprising Heads of Departments, supports the SSC in executing the daily implementation and monitoring of sustainability initiatives.

### 3. ROLES AND RESPONSIBILITIES



#### 3.1 Key Roles and Responsibilities of the Board of Directors

- i. Provides oversight and approval of the Group's sustainability governance, ensuring alignment of strategies, policies and material sustainability matters with business objectives and compliance with applicable laws and regulations.
- ii. Provides strategic direction on integrating sustainability, including ESG and climate-related risks and opportunities into the Group's overall business strategy and risk management framework.
- iii. Evaluates and endorses key sustainability policies, strategies and the annual Sustainability Statement as proposed by the SSC.

#### 3.2 Key Roles and Responsibilities of the SSC

- i. Develops and proposes sustainability policies, strategies and targets.
- ii. Oversees the monitoring of key sustainability metrics and tracks progress against established goals and targets.

- iii. Identifies, evaluates and manages ESG and climate-related risks and opportunities.
- iv. Ensures sufficient allocation of resources and budget to support sustainability initiatives.
- v. Provides the Board with updates on sustainability performance and progress as necessary.

### **3.3 Key Roles and Responsibilities of the SWC**

- i. Executes sustainability policies, strategies and initiatives approved by the SSC.
- ii. Collects and analyses sustainability performance data to measure progress and support decision-making.
- iii. Collaborates with both internal and external stakeholders to advance sustainability initiatives across the Group.
- iv. Suggests improvements to sustainability practices for adoption when necessary.

## **4. SUSTAINABILITY COMMITTEE MEETINGS**

- i. The SSC shall meet at least quarterly and convene additional meetings as required.
- ii. The Chairman of the SSC shall be the Group Managing Director. In the Chairman's absence, a designated SSC member, deemed most suited to address and resolve issues, shall serve as the interim chair.
- iii. A minimum of five (5) SSC members, including the Chairman, must be present to form a quorum for meetings.
- iv. SSC members may attend meetings remotely via telephone, video conferencing or other modes of communication, and shall be considered present.
- v. Notice and agenda for meetings shall be provided to all SSC members and required attendees at least seven (7) days in advance.
- vi. The minutes of the meeting shall be confirmed by SSC Chairman before being circulated to all members.

## **5. REPORTING RESPONSIBILITIES**

- i. The SSC shall submit its conclusions and recommendations to the Board following each meeting.
- ii. Any critical issues identified by the SSC shall be escalated to the Board for review at the discretion of the Chairman and SSC members.

## **6. REVIEW OF TERMS OF REFERENCE**

The Terms of Reference for the Sustainability Governance Structure shall be reviewed annually, or as required. Any proposed revisions or amendments, whether suggested by the SSC or an external party, must be presented to the Board for approval.