

**SUNWAY**



**SUNWAY BERHAD**  
**IFRS S1 & S2 REPORT**  
**2025**



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**DISCLAIMER**

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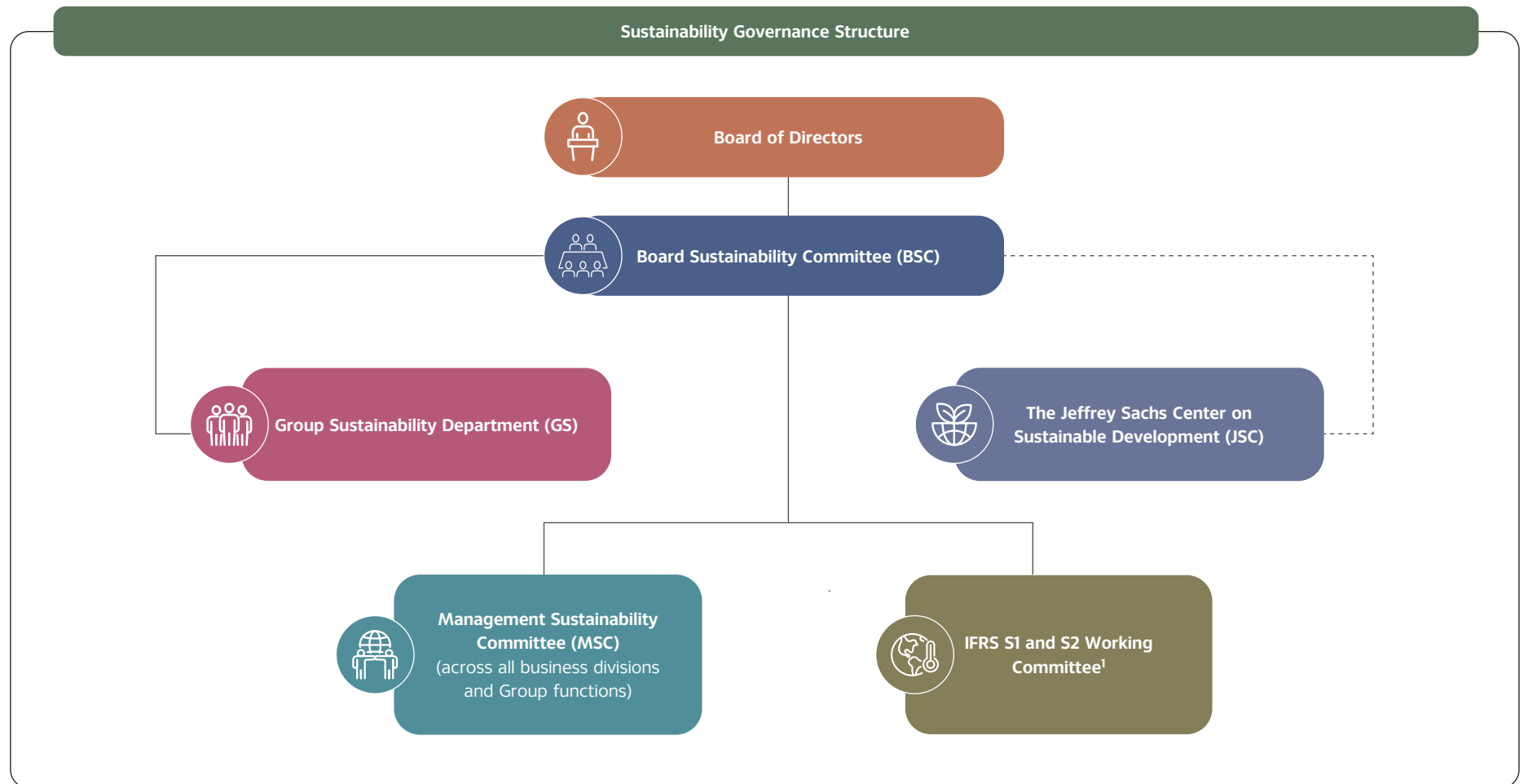
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# Sustainability Governance



## Governance

At Sunway, we are committed to upholding the highest standards of corporate and sustainability governance. Our governance framework is built on the principles of integrity, transparency, and accountability, ensuring that ethical practices are deeply embedded across all levels of decision-making. Guided by a committee comprising diverse expertise, we integrate sustainability considerations into corporate strategy and operations, reinforcing responsible leadership and long-term value creation.



**Note:**

1. The formation of the Committee was approved on 1<sup>st</sup> April 2026.

## Sustainability Governance

### ROLES AND RESPONSIBILITIES

#### Board of Directors

The Board guides the Company and its subsidiaries, steering them towards the attainment of the Company's goals and objectives. The Board is also accountable for developing and reviewing the strategy, providing directions, core values and corporate governance, while providing oversight of the Company's management. These actions are essential to ensure that the business operates with integrity and adheres to all the relevant rules and regulations.

#### Board Sustainability Committee (BSC)

The BSC is responsible for reviewing, supervising, and making recommendations to the Board on the Company's sustainability strategy, key issues, ESG targets, performance, and progress. The BSC meets at least twice a year to discuss, deliberate, and evaluate Sunway's advancement toward its sustainability goals. Its roles and responsibilities are outlined in the Committee's Terms of Reference.

#### The Jeffrey Sachs Center on Sustainable Development (JSC)

The Jeffrey Sachs Center on Sustainable Development (JSC) at Sunway University serves as an advisory panel to the BSC, offering research-driven insights and academic consultation to support informed decision-making. The JSC provides guidance to help the Company mitigate sustainability- and nature-related risks, identify emerging opportunities, and strengthen the integration of sustainability across all operations.

#### IFRS S1 and S2 Working Committee

The IFRS S1 and S2 Working Committee, which was formally approved in April 2026, is responsible for the systematic evaluation of sustainability-related risks and opportunities, in close collaboration with the GS team. The Committee is co-chaired by the Chief Financial Officer and the Head of Sustainability, and comprises representatives from the Sustainability, Risk Management and Strategy functions. The Board-level Risk Management Committee is also kept informed of developments by this Committee.

#### Group Sustainability Department (GS)

Established in 2017, the GS Department drives the integration of sustainability principles across daily operations. Reporting to the Executive Director of the Chairman's Office, the GS ensures that the Company and Board fulfil regulatory obligations for ESG disclosures through the annual Sustainability Report. The team coordinates the collection, analysis, and interpretation of ESG data, formulates policy recommendations, and proposes Group-wide action plans. It also keeps the BSC and MSC informed of key ESG developments, including climate-related risks, opportunities, and regulatory changes, while supporting all business divisions in achieving their sustainability Key Performance Indicators (KPIs).

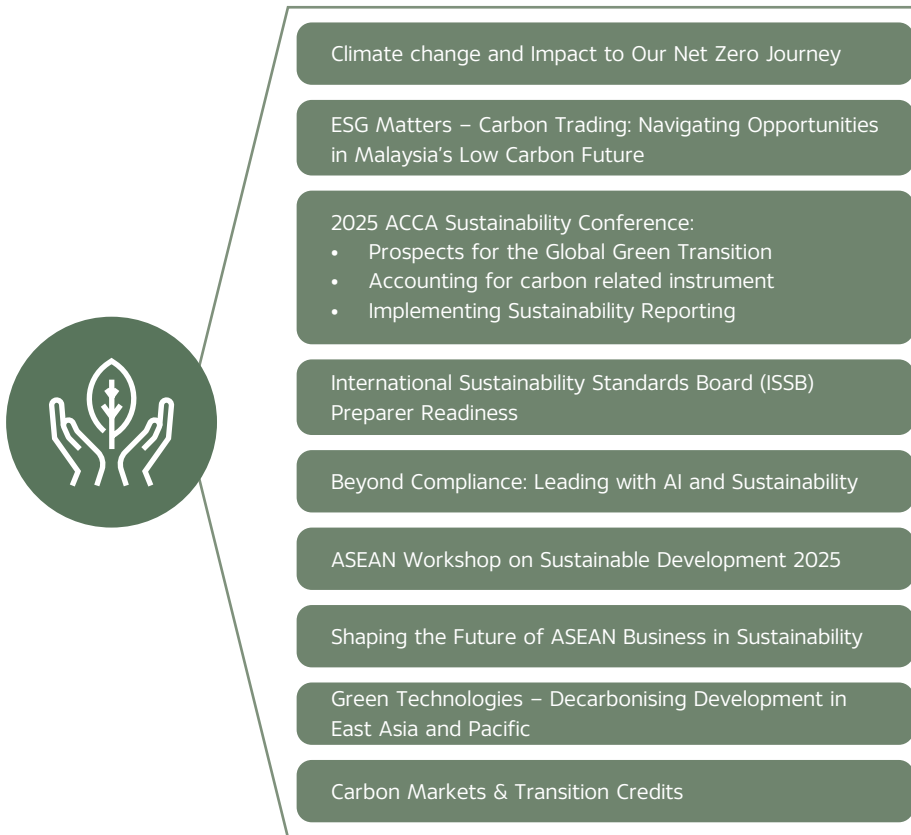
#### Management Sustainability Committee (MSC)

Comprising Business Division Heads, the MSC is responsible for ensuring that the Company's sustainability strategy, including biodiversity management, and directions set by the BSC are communicated and implemented across all employees and business divisions. The MSC also serves as a platform to gather feedback and address sustainability- and nature-related matters.

**BOARD SUSTAINABILITY COMMITTEE**

At Sunway, the BSC holds ultimate responsibility for overseeing sustainability-related, nature-related and climate-related risks and opportunities, including setting Sunway's ESG targets and monitoring the Company's progress scorecard. The BSC obtains updates on the Company's sustainability- and nature-related matters from the GS, as well as updates from the Sunway Integrated Properties (SIP) team on Environmental Impact Assessments (EIA), when available. The BSC comprises four Directors from Sunway's Board of Directors, led by Chairperson, Datuk Mohd Anuar bin Taib. In 2025, the BSC convened a total of 2 meetings, deliberating material matters to be included for IFRS S1 disclosures, updates to the GHG reporting boundary, and reviews for Sunway's ESG KPI performance. To ensure the Board keeps abreast with the relevant sustainability knowledge and skillset, the Company regularly conducts training needs analyses and provides the Board with various training programmes covering Net Zero transition, carbon markets & instruments, sustainability reporting, governance, and artificial intelligence (AI). Plans are in place to enhance the BSC's understanding of nature-related issues through collaborative awareness talks with the Jeffrey Sachs Center on Sustainable Development (JSC).

In 2025, the Board members attended trainings related to ESG as follows:



Acting as an advisor to the BSC, the JSC provides recommendations on sustainability-related strategy, risk and impact management, as well as metrics and targets.

In 2025, the Company commenced its assessment in alignment with the Taskforce on Nature-related Financial Disclosures (TNFD) framework, with the JSC supporting the process through guidance on nature-related risk identification, strategic considerations and disclosure development.

In support of the Company's broader climate-related risk management efforts, the JSC conducted a Value at Risk (VaR) scenario analysis in 2024 for physical and transition risks, alongside the evaluation of mitigation strategies and climate resilience planning. The analysis covered 70 out of the Company's total portfolio of 106 properties, including detailed assessments of operational facilities and assets across nine states in Malaysia.

Evolving climate risks are continuously tracked through property inspections, maintenance records and climate trend analyses. These insights feed into board-level risk reviews, shaping strategic planning and investment decisions. Climate-related risks are integrated into Sunway's enterprise risk register and assessed alongside operational, financial and strategic risks. This integrated approach ensures that climate resilience informs decisions on capital allocation, insurance coverage and asset acquisition or redevelopment.



For the list of training provided to the Board, please refer to the 2025 Sunway Corporate Governance Report.

Sustainability Governance



**Datuk Mohd Anuar bin Taib**  
 Designation: Deputy President (January 2025),  
 President (January 2026)

**Date of appointment:** 10 April 2025 **Meeting attendance:** 1/1\*

**Qualifications:**

- Master of Business Administration in International Management from RMIT University, Melbourne, Australia
- Bachelor of Science in Engineering (Mechanical) from Case Western Reserve University, Cleveland, Ohio



**Datuk Tong Poh Keow**  
 Designation: Independent Non-Executive Director

**Date of appointment:** 27 November 2020 **Meeting attendance:** 2/2

**Qualifications:**

- Chartered Accountant of Malaysian Institute of Accountants (MIA)
- Chartered Accountant of Association of Chartered Certified Accountants, United Kingdom ("UK") (ACCA)
- Chartered Secretaries and Administrators, UK (ICSA)
- Diploma in Commerce from Kolej Tunku Abdul Rahman

*\* reflects the number of meetings held during the time the Director holds office.*



**Name: Datin Paduka Sarena Cheah Yean Tih**  
 Designation: Executive Deputy Chairman

**Date of appointment:** 27 November 2020 **Meeting attendance:** 2/2

**Qualifications:**

- Fellow of the Australian Society of Certified Practising Accountants (ASCPA)
- Master in Business Administration from Melbourne Business School
- Bachelor of Commerce (Accounting and Finance) from the University of Western Australia
- Capital Markets Services Representative's Licence (CMSRL) holder



**Name: Dr. Philip Yeo Liat Kok**  
 Designation: Senior Independent Non-Executive Director

**Date of appointment:** 27 November 2020 **Meeting attendance:** 2/2

**Qualifications:**

- Master in Business Administration from Harvard University
- Master of Science (Systems Engineering) from University of Singapore
- Honorary Doctor of Engineering from University of Toronto, Canada
- Bachelor of Applied Science (Industrial Engineering) from University of Toronto, Canada

 Risk Management

In 2025, robust risk management has become even more integral to our strategic and operational landscape, guiding how we anticipate, respond to, and adapt to emerging challenges for the benefit of our stakeholders. Operating across high-risk sectors such as property, construction, building materials, and quarry, we face direct exposure to evolving climate, regulatory, and market dynamics. The convergence of rising energy costs, potential carbon-pricing mechanisms, tightening sustainability reporting requirements, and heightened stakeholder expectations has made effective governance more critical than ever.

**ENTERPRISE RISK MANAGEMENT (ERM)**

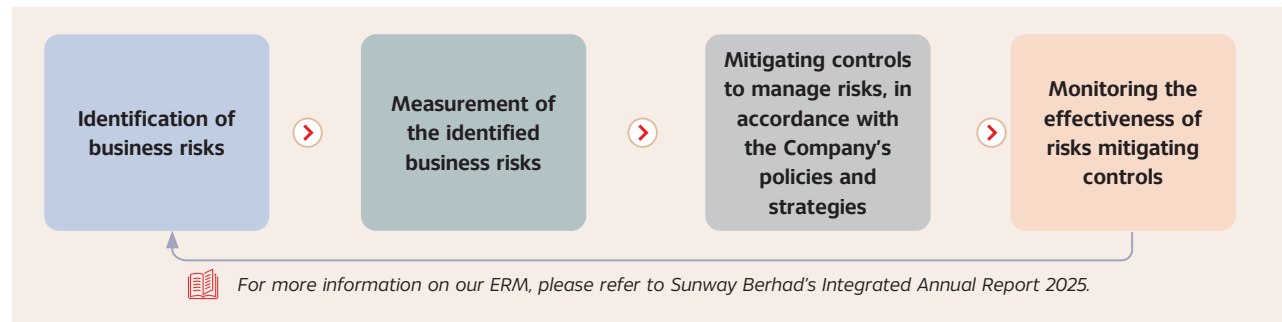
Our ERM framework is a cornerstone of our management approach, guiding the assessment and management of climate- and sustainability-related risks that support long-term resilience. By embedding these considerations across all business activities and processes, we strengthen our ability to anticipate and respond to uncertainties, protect asset performance, and capture opportunities arising from the global transition toward a low-carbon, sustainable economy.

To ensure coherence between our Sustainability Report and Integrated Annual Report (IAR), we have aligned sustainability-related risks disclosed under IFRS S1 and S2 with the Company's principal risk categories within our ERM framework. This integrated mapping strengthens oversight at Board and management levels, ensuring that financial and sustainability risks are assessed holistically rather than in isolation.

**OUR ERM PROCESS**

Sunway's ERM framework is supported by the Group Risk & Compliance Department, which works closely with business divisions to ensure consistent application of risk policies and alignment with strategic objectives. Material risks such as climate-related and sustainability risks are integrated into the Company's risk register and reviewed periodically to ensure responsiveness to changing conditions. As climate and extreme weather events in Malaysia continue to evolve, low-probability and high-impact phenomena such as earthquakes and tsunamis have been added into our risk management framework.

Guided by the ISO 31000:2018 Risk Management Guidelines and aligned with industry best practices, the framework enables us to proactively manage potential risks, optimise costs, and strengthen the Company's reputation. Our ERM framework integrates the following core principles through a structured process that ensures risks are systematically identified, assessed, mitigated, and monitored:



**TIME HORIZONS**

The Company's time horizons, applicable to both IFRS S1 and IFRS S2 disclosures, are determined by the scale and pace of actions required to achieve our climate commitments. The short-term period (now to 2027) focuses on implementing immediate, high-impact solutions to reduce emissions and strengthen operational efficiency. The medium-term horizon is defined from 2028 to 2034, marking the milestone by which we aim to halve our emissions and accelerate decarbonisation across our operations. Beyond 2034, the long-term period centres on advancing offset strategies and technologies, such as carbon capture and storage, together with investments in large-scale renewable energy, to achieve our net zero target by 2050.

Time Horizon	Period	Description
Short Term	1-3 years (2025-2027)	Focuses on immediate actions and tactical decisions to address pressing climate-related risks and opportunities, ensuring operational resilience and compliance with near-term regulatory requirements
Medium Term	4-7 years (2028-2034)	Linked to Sunway Berhad's midrange strategic planning, including capital allocation for infrastructure investments, technological upgrades and implementation of climate adaptation and mitigation strategies
Long Term	>7 years (Beyond 2034)	Aligned with Sunway Berhad's vision for sustainable growth, addressing structural transformations, and long-range asset planning aligned with global climate targets and industry trends

Global temperatures are expected to remain at or near record highs between 2025 and 2029. According to the World Meteorological Organisation (WMO), each year within this period is projected to be between 1.2°C and 1.9°C warmer than the 1850–1900 pre-industrial average. There is an estimated 86% likelihood that at least one year will surpass the 1.5°C threshold, and about a 70% chance that the five-year average will exceed 1.5°C above pre-industrial levels.<sup>1</sup> These projections, coupled with the emissions gap assessment, underscore the growing disconnect between current national commitments and the Paris Agreement goals. Even with full implementation of existing Nationally Determined Contributions, global warming is now projected at 2.3–2.5°C this century, with current policies tracking closer to 2.8°C, leaving the world significantly off course to limit warming to well below 2°C.<sup>2</sup> As a result, the climate system is entering a period of heightened risk. The likelihood of intensified heatwaves, extreme rainfall, prolonged droughts, accelerated ice melt, and rising sea levels is expected to increase significantly in the coming years.

**SUSTAINING OUR CLIMATE JOURNEY BACKED BY GLOBAL STANDARDS**

Sunway remains steadfast in its commitment to mitigating climate risks, strengthening resilience, and advancing sustainable growth in line with the Paris Agreement and Malaysia’s aspiration to achieve Net Zero Carbon Emissions by 2050. Driving carbon reduction across our portfolios and cities is central to this commitment, reflecting our dedication to adapting to climate change and fostering long-term resilience. As the urgency to reduce global emissions intensifies, we have strengthened our climate action efforts and implemented tangible measures to advance our Net Zero Carbon Emissions by 2050 goal, aligned with the global ambition to limit warming to 1.5°C.

Reflecting the global climate landscape, Malaysia is already experiencing the effects of rising temperatures, heavier rainfall, prolonged droughts, and coastal flooding. In alignment with the National Adaptation Plan (MyNAP), the country is prioritising resilience-building initiatives to safeguard critical sectors such as urban development, water resources, and public health<sup>3</sup>. These priorities strongly align with Sunway’s core operations in property development, construction, and infrastructure management. While increased rainfall and heat stress pose risks to assets and operations, they also create opportunities to strengthen climate-responsive design, enhance operational efficiency, and build greater adaptive capacity across our developments.

In response to these growing challenges, the Company has expanded its Net Zero 2050 target to include emissions from tenants’ energy consumption under Scope 3 (Category 13), as part of its interim goal to halve total emissions by 2030. This reinforces accountability across all business divisions and strengthens



Sunway’s contribution to Malaysia’s low-carbon transition. We have introduced our ICP Framework, the first of its kind at the corporate level in Malaysia, and it remains central to embedding climate considerations in business decisions. For 2025, Sunway’s ICP rate is set at RM15 per tonne of CO<sub>2</sub>e emissions, with incentives of RM15 per tonne of CO<sub>2</sub>e emissions avoided through renewable energy generation and RM150 per tonne of CO<sub>2</sub>e avoided by diversion of waste. By assigning a monetary value to carbon, the framework guides investment and operational planning while funding initiatives that reduce emissions intensity. In 2025, the mechanism continued to incentivise low-carbon projects such as renewable energy deployment and energy-efficiency upgrades, further solidifying our commitment to a sustainable, climate-resilient future.

**Beyond emissions reduction, Sunway recognises that climate and nature are interlinked. Through early alignment with the TNFD, the Company is now integrating nature-related risks and dependencies into its strategic planning to strengthen ecosystem and business resilience.**

**Note:**

1. World Meteorological Organisation, Global Annual to Decadal Climate Update (2025–2029), 28 May 2025.
2. United Nations Environment Programme, Emissions Gap Report 2025.
3. “National Adaptation Plan Will Complement the Delayed Climate Change Act”, The Edge Malaysia, 15 October 2025.



## Climate-Related Risks and Opportunities

We integrate climate-related risks and opportunities (CROs) into our overall risk management framework to strengthen long-term asset resilience and ensure business continuity. Embedding these considerations into our core processes enhances our ability to anticipate and respond to emerging challenges, protecting asset performance and sustaining value over time. Our analysis was conducted by consolidating Sunway's business divisions into a single framework, rather than separating into 'Build', 'Own' and 'Operate' categories, which better represents the interconnectedness of CROs across the value chain. As a result, the Company has a unified emissions reduction strategy, allowing us to collectively tackle embodied and operational carbon challenges.

Financial exposure to climate risks remains low relative to asset value, with regulatory-driven energy cost hikes identified as a key focus area. To address this, we are expanding solar investments and advancing energy efficiency initiatives to reduce long-term costs and carbon emissions. Supported by a structured mitigation framework and continuous sustainability efforts, we are well-positioned to strengthen resilience and capture opportunities arising from the transition to a low-carbon economy.

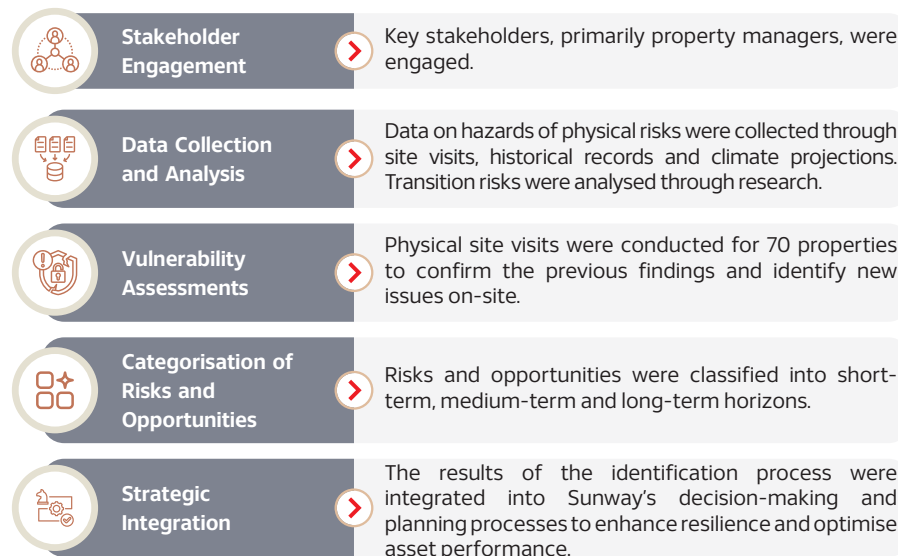
### OUR CRO METHODOLOGY

Both physical and transition risks are assessed to provide a holistic understanding of potential impacts across our operations. Risks are prioritised based on financial exposure, asset importance, and tenant vulnerability. Properties identified as high-risk are addressed through immediate mitigation measures, while lower-risk assets are closely monitored and reviewed regularly. Evolving climate risks are tracked through ongoing inspections, maintenance reports, and climate data updates, with findings incorporated into Board-level risk reviews to guide strategic and investment decisions.

Climate risks form an integral part of our broader risk register and are evaluated alongside operational, financial, and strategic factors. This approach ensures that climate resilience remains a key consideration in capital allocation, insurance coverage, and decisions related to asset acquisition, redevelopment, and long-term planning.

We recognise the importance of enhancing the robustness and comparability of our disclosures and are progressively strengthening our data collection systems, internal processes, and analytical capabilities. These efforts are aimed at improving data quality and coverage, enabling a gradual transition from qualitative assessments to more consistent and decision-useful quantitative disclosures over time.

### IDENTIFICATION OF CLIMATE RISKS AND OPPORTUNITIES



### VALUE AT RISK (VaR)

As an extension of Sunway Berhad's ERM framework, the Company applies quantitative tools such as Value-at-Risk (VaR) analysis to translate strategic and sustainability risks into measurable financial terms. This enables a clearer understanding of how evolving climate and market dynamics could affect asset value, cash flows, and long-term business resilience. VaR assessments serve as a bridge between enterprise-level risk governance and asset-level financial planning, ensuring that climate considerations are integrated into investment, operational, and mitigation strategies.

Building on the foundation established through VaR scenario analyses initiated in 2021, Sunway has deepened its understanding of how climate factors affect asset performance and financial stability. In 2024, the Company enhanced the identification and quantification of CROs by assessing the potential financial implications of climate change on its portfolio of properties. Consistent with the IFRS S2 Climate-related Disclosures, the study covered physical and transition risks, mitigation strategies, and climate-resilience planning across 70 properties of the Company's total 106 assets in Malaysia, at the time of assessment. The assessment encompassed operating facilities and real-estate assets in nine states nationwide, using both historical data and future climate projections. It evaluated exposure and adaptive capacity over the short, medium, and long terms, addressing a range of factors such as temperature extremes, flood susceptibility, energy-cost volatility, regulatory change, and shifts in investor and tenant expectations.

**PHYSICAL RISK**

In Malaysia, the two primary physical risks with potential material impacts on properties are sea level rise (SLR) and increased rainfall intensity. SLR can contribute to more frequent coastal flooding, while heavier rainfall can lead to flash floods and water seepage in buildings. Rainfall-related risks, including riverine and rainfall-driven flooding, are prioritised as they can be more readily quantified, enabling a clearer assessment of potential costs and financial implications for mitigation and adaptation measures.

**Scenario Analysis**

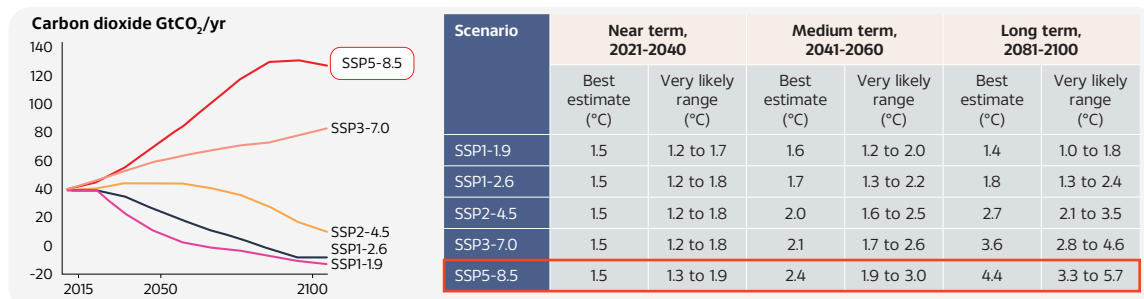
We utilised the following methodology to conduct a scenario analysis and assess the material physical risks for Sunway's properties:

**Step 1: Reviewed the recent scientific forecast of SLR and rainfall intensity up to 2100**

We defined the worst-case scenario for Southeast Asia using data from the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (2021) and the WGI Interactive Atlas (2023). These datasets provided projections on temperature anomalies, precipitation changes, and sea level rise, allowing us to assess potential impacts on Sunway's properties and operations.

For this analysis, we adopted the IPCC's Shared Socioeconomic Pathway 5-8.5 (SSP5-8.5) scenario, which reflects a future with minimal climate mitigation and continued dependence on fossil fuels. Under this pathway, annual global carbon emissions could exceed 120 gigatonnes by 2100, leading to a median global temperature increase of approximately 4.4°C above pre-industrial levels. This scenario projects severe climate impacts, including intensified heatwaves, heavier rainfall, and significant sea level rise.

This scenario is relevant for assessing Sunway's climate resilience as it tests the robustness of long-lived assets under extreme physical risk conditions. It provides a conservative benchmark for stress-testing mitigation and adaptation measures, informs long-term infrastructure and capital planning, and ensures that risk assessments consider a broad range of plausible climate futures. In line with the Paris Agreement, lower-emissions pathways such as the SSP1-1.9 scenario may be considered in future analyses to capture scenarios characterised by lower physical risks and higher transition risks under an orderly transition.



Under the scenario SSP5-8.5, we assessed projections for sea level rise (SLR) and maximum one-day precipitation in Southeast Asia based on IPCC models. SLR projections range between 0.4 and 1.1 metres for the period 2081 to 2100, with 0.7 metres adopted as the median SLR VaR parameter to evaluate property resilience. For maximum one-day precipitation, projections indicate an increase of 6.7% to 46.6% over the same period compared to the 1995–2014 baseline, signalling greater exposure to extreme rainfall and associated flood risks.

To maintain a balanced and realistic risk assessment, we adopted 16.9%, the median value of the projected increases, as the VaR parameter. In previous assessments, worst-case scenarios were used to stress-test property resilience under extreme conditions. The current approach focuses on median projections to reflect the most probable climate outcomes, allowing for more practical and efficient resource allocation. This shift enhances alignment with stakeholder expectations while ensuring our framework remains robust, data-driven, and grounded in real-world climate trends.

**Step 2: Identified the elevation of each property vis-à-vis sea level and location relative to the coast and river**

We assessed the elevation of each property relative to sea level using online topographic tools such as FloodMap and Climate Central. The proximity of each site to coastal and riverine areas was determined using Google Earth to evaluate exposure to SLR risks. Properties were considered at risk of flooding if SLR reached 0.7 metres or 1.1 metres, based on the adopted scenario parameters. Assets located in areas without direct ground contact were excluded from the SLR assessment.

**Step 3: Conducted flood map analysis to evaluate potential inundation scenarios and risks across the portfolio**

Topography served as the key factor in the flood analysis, with particular attention given to identifying localised depressions, or bluespots. The capacity of each bluespot to retain rainfall and its corresponding depth were analysed and compared against historical Average Recurrence Intervals (ARI) for rainfall events. This approach allowed us to estimate the likelihood of flooding within defined timeframes, (less than 50 years, between 50 and 100 years, and beyond 100 years) providing a clearer understanding of site-specific flood risks.

**Step 4: Obtained flooding and other rain-intensity-induced events (e.g. water seepage in buildings), historical occurrence record and damage cost for each property from the property managers**

Historical records of flood occurrences and associated damage costs were collected from property managers to assess localised flood risks. This data provided insight into the likelihood of future events based on past incidences and local site characteristics. It also informed estimates of the potential financial impact and repair costs that may arise from flooding or other rain-intensity-related events, supporting more accurate risk quantification and mitigation planning.

### Findings of the Scenario Analysis

Sunway does not have any assets or business activities that face existential threats from climate change. Sea level rise poses minimal risk to our properties, while direct rainfall damage and riverine flooding present moderate risks, particularly for retail and hospitality assets. Annual maintenance costs from rainfall-related impacts are estimated at RM13 million representing 0.09% of asset value, while potential flood-related costs could reach RM379 million, or 2.64% of asset value. Taking into account the non-material exposure to climate risk and our robust mitigation measures ensuring long-term operational resilience, none of our existing assets require redeployment, repurposing, or decommissioning.

	High Risk	Medium Risk	Low Risk
<b>Sea Level Rise - Chronic Physical Risk</b>			
<b>Long term</b>			
	<2 metres above mean sea level (Ground floor)	2-10 metres above mean sea level	>10 metres above mean sea level
<b>Number of Properties Impacted</b>	1	2	64
These properties were assessed based on key factors such as elevation above mean sea level to determine risk levels and were found with low vulnerability to SLR due to their limited exposure and proactive mitigation measures. Three properties have zero exposure to SLR risks due to their elevated starting levels.			
<b>Direct Rainfall Damage – Acute Physical Risk</b>			
<b>Short term to long term</b>			
	Average yearly cost of repair from rainfall is >RM100,000 and above 1% of total asset value	Average yearly cost of repair from rainfall is >RM20,000	Average yearly cost of repair from rainfall is <RM20,000
<b>Number of Properties Impacted</b>	3	24	43
These properties were assessed based on criteria such as average annual repair costs from rainfall damage. The estimated total annual maintenance cost from direct rainfall damage is RM13 million, approximately 0.09% of the total appraised value of Sunway Berhad's properties. The relatively low percentage suggests that while rainfall damage incurs costs, its financial impact on the overall portfolio remains minimal.			
<b>Riverine/Rainfall Driven Flooding – Acute Physical Risk</b>			
<b>Short term to long term</b>			
	<ul style="list-style-type: none"> <li>• The property is in close proximity to localised depressions which can be filled under normal rainy conditions.</li> <li style="text-align: center;">OR</li> <li>• The property has experienced water ponding or flooding history particularly during heavy rainfall events (e.g. once in 4 to 7 years).</li> </ul>	<ul style="list-style-type: none"> <li>• The property is adjacent to larger localised depressions where rainfall events between once in 50 and once in 100 years could cause flooding.</li> <li style="text-align: center;">OR</li> <li>• The property has experienced moderate flooding, such as inundation in basements or localised depressions.</li> </ul>	<ul style="list-style-type: none"> <li>• The property is located in an area with adequate drainage and low probability of rainfall-driven flooding (once in more than 100 years).</li> </ul>
<b>Number of Properties Impacted</b>	26	16	25
The properties were assessed based on proximity to localised depressions, historical flooding patterns and drainage capacity. The estimated potential flood-related costs for the assessed properties are approximately RM379 million or 2.64% of their appraised value, if flooding were to occur. While not all properties in Sunway Berhad's portfolio are susceptible to flooding, and such events have been infrequent, the historical impact of floods highlights the need for ongoing monitoring and targeted mitigation strategies to manage the potential risk. Despite the low likelihood of future occurrences, the frequency of extreme weather events is expected to increase as climate change progresses. Three properties have zero exposure to riverine/rainfall-driven flooding risks due to their elevated starting levels.			

**SEA LEVEL RISE RISK**

Long term

**Arises from the properties' locations and their elevation relative to mean sea level.**

**Legend:**  Financial Position  Financial Performance  Cash Flow

**Changes in Financial Performance and Cash Flows**

**Long Term**



No Sunway properties are at direct risk of sea level rise. As such, there is a low impact of this risk on the financial position and performance in Sunway Berhad's overall portfolio over the short, medium and long term.

**Mitigation Strategies**

No properties have been identified as requiring significant attention or major mitigation measures in response to sea level rise.

**Current Effects**

- Property Value: Reduced value for coastal flood-prone properties
- Higher Costs: Increased maintenance and insurance premiums
- Tenant Disruptions: Risk of tenant relocations and lower occupancy

**Anticipated Effects**

- Capital Expenditures: Investments in flood mitigation and infrastructure upgrades
- Regulatory Compliance: Need for sustainability measures and climate resilience
- Revenue Impact: Potential declines in rental income and occupancy
- Reputation: Proactive climate measures could enhance brand value
- Investment Shifts: Focus may shift to more climate-resilient properties










**DIRECT RAINFALL DAMAGE RISK**

Short term to long term

**Arises from structural vulnerabilities of the property, including insufficient waterproofing, cracks in roofs and walls, and water accumulation on flat roofs.**

**Legend:**  Financial Position  Financial Performance  Cash Flow

**Changes in Financial Performance and Cash Flows**

Short Term	Medium Term	Long Term
 Increased repair costs for waterproofing, cracks and water accumulation. Minor impact on property value.	 Ongoing repairs, potential moderate decline in property valuation, more resources allocated to manage risks	 Significant repair costs, severe property value impairment, major resource allocation affecting asset stability
 Minor profitability impact due to immediate repairs and resource allocation	 Higher repair costs and impairments reduce profitability, ongoing resource allocation affects performance	 Notable profitability declines if vulnerabilities remain unaddressed, sustained resource allocation weakens performance
 Slight cash flow strain from initial repairs and improvements	 Increased strain from higher repair costs and mitigation efforts	 Major liquidity challenges due to large-scale structural improvements

**Mitigation Strategies**

Investing in resilience (waterproofing) may incur initial costs but will save long-term costs by reducing repairs, stabilising property values, and improving financial performance and cash flow.

**Direct Mitigation and Adaptation Efforts**

Investing in resilience (waterproofing) may incur initial costs but will save long-term by reducing repairs, stabilising property values, and improving financial performance and cash flow. Some Sunway properties have already enhanced or are planning to upgrade their waterproofing systems. This includes reinforcing walls, windows and roofs to prevent water seepage, as well as sealing cracks in these areas.

**Indirect Mitigation and Adaptation Efforts**

Regular maintenance and building repairs including enhancing waterproofing and drainage systems are also taken. For leased properties, the Sunway team actively collaborates with property owners, sharing expertise and recommendations to implement long-term solutions. Additionally, Sunway encourages property owners to adopt preventive measures, such as structural reinforcements and regular inspections, to minimise future risks and disruptions.

**Current Effects**

- During the financial year, water leakage rectification works were undertaken at selected office properties:
  - Menara Sunway: RM245,000
  - Sunway Pinnacle: RM80,000
- These costs, totalling RM325,000, were recognised under Sunway REIT's operating expenses. An estimated 0.05% per annum effect has been considered for anticipated future impacts associated with water leakage risks.

**Anticipated Effects**

- Total annual maintenance costs due to rainfall damage are estimated at RM13 million (0.09% of asset value), while potential flood-related costs could reach RM379 million (2.64% of asset value) if flooding were to occur. While not all properties in Sunway Berhad's portfolio are susceptible to flooding, and such events have been infrequent, the historical impact of floods highlights the need for ongoing monitoring and targeted mitigation strategies to manage the potential risk. Despite the low likelihood of future occurrences, the frequency of extreme weather events is expected to increase as climate change progresses.
- Addressing these risks is expected to increase appeal among ESG-conscious investors and tenants.










**RIVERINE/RAINFALL-DRIVEN FLOODING RISK**

Short term to long term

**Arises from the properties' locations and the design limitations of their drainage and gutter systems.**

**Legend:**  Financial Position  Financial Performance  Cash Flow

**Changes in Financial Performance and Cash Flows**

Short Term	Medium Term	Long Term
 Increased repair costs for waterproofing, cracks and water accumulation. Minor impact on property value.	 Ongoing repairs, potential moderate decline in property valuation, more resources allocated to manage risks	 Significant repair costs, severe property value impairment, major resource allocation affecting asset stability
 Minor profitability impact due to immediate repairs and resource allocation	 Higher repair costs and impairments reduce profitability, ongoing resource allocation affects performance	 Notable profitability declines if vulnerabilities remain unaddressed, sustained resource allocation weakens performance
 Slight cash flow strain from initial repairs and improvements	 Increased strain from higher repair costs and mitigation efforts	 Major liquidity challenges due to large-scale structural improvements

**Mitigation Strategies**

Investing in flood resilience (e.g. flood barriers, drainage improvements) may incur initial costs but will save long-term costs by reducing repair needs, stabilising property values, and improving financial performance and cash flow

**Direct Mitigation and Adaptation Efforts**

To better manage excess water and reduce flood risk, many properties have implemented measures such as sump pits, submersible pumps and regular maintenance of drainage and gutter systems. Some properties are also planning to expand their drainage systems to further improve flood resilience.

**Indirect Mitigation and Adaptation Efforts**

Actively collaborating with local governments to address flooding issues caused by inadequate drainage systems. These efforts aim to minimise traffic disruptions affecting visitors to Sunway Big Box Retail and Sunway Big Box Hotel in Johor and Sunway Winstar Kuching in Sarawak.

**Current Effects**

- Increased Maintenance Costs: Frequent repairs due to inadequate drainage and gutter systems
- Reputation Risk: Frequent water issues may harm reputation, affecting tenant retention and leasing

**Anticipated Effects**

- Rising Repair Costs: Increased repair expenses as climate risks like heavy rainfall and flooding worsen
- Capital Allocation for Upgrades: Significant investments needed for drainage and gutter system improvements
- Value Chain Impact: Specialised contractors and stricter building codes may affect supply chains and future property strategies
- Portfolio Shift: Long-term properties with outdated systems may be phased out for more resilient assets

## TRANSITION RISK

Transition risk refers to the financial and operational challenges that emerge from the global shift toward a low-carbon economy, driven by changes in policy, technology, market dynamics, and stakeholder expectations. For Sunway, the primary transition risks relate to potential policy changes affecting electricity costs and reputational risks associated with land development. While the financial exposure from electricity costs remains low relative to asset value, increases in tariffs could impact the viability of certain operations. Technology risks are minimal, and market risks arising from changing travel and shopping behaviours are considered low. Reputational risks remain low and are primarily associated with potential impacts to physical assets arising from unforeseen environmental, criminal or accidental events beyond the Company's control. In the unlikely case of these events occurring, the reputational risk is mainly borne by the operator of the leased property. As for projects within our control, environmental concerns related to Sunway City Iskandar Puteri may give rise to reputational considerations, which the Company continues to monitor through proactive engagement and responsible management practices.

All operational units and properties are exposed to the possibility of higher electricity tariffs, particularly if the current voluntary GET becomes mandatory for commercial entities. The estimated implementation cost of the mandatory GET as of FY2025 is RM12.3 million which would raise the Company's total electricity cost from RM110 million to approximately RM122 million. Among identified risks, this represents the most significant climate-related financial exposure for Sunway in terms of combined value-at-risk and likelihood of occurrence, surpassing major flood events (low likelihood but high damage potential) and rainfall-related roof damage (high likelihood but low financial impact).

### Scenario Analysis

The study identified Sunway's primary transition risks as potential increases in electricity costs arising from policy changes and the financial implications of refraining from land development to preserve its reputation. Transition risks were evaluated at the organisational level across four key categories:

#### Policy and Legal

##### **Evaluated Sunway's exposure to evolving environmental regulations, carbon pricing mechanisms and compliance requirements at both national and global levels.**

The main transition risk identified for Sunway is policy change related to electricity costs, encompassing both direct and indirect impacts. Direct risks stem from evolving solar energy installation requirements, while indirect risks arise from potential increases in Tenaga Nasional Berhad (TNB) tariffs should the GET become mandatory, particularly affecting Sunway-operated properties.

In 2025, our renewable energy consumption amounted to 22 gigawatt-hours (GWh). This indicates that solar power contributed approximately 5% of the Company's total electricity consumption. The Company's annual electricity expenditure was estimated at RM110 million with solar energy generation savings of about RM1.4 million.

Policy-related risks are expected to rise as electricity prices increase due to higher fossil fuel costs and the possible mandatory implementation of the GET. While this would elevate operating costs, it would also lead to a significant reduction in the Company's carbon footprint, which is largely derived from grid electricity consumption. The total financial exposure to policy and legal transition risks is estimated at RM12.3 million or 11% of the Company's current electricity cost – representing the most significant and likely climate-related financial risk faced by Sunway. Additionally, a similar tariff mechanism may be introduced in the future for water usage, which could present a new policy-driven cost consideration.

#### Technology

##### **Assessed Sunway's readiness to adopt low-carbon technologies, including the feasibility of energy-efficient upgrades and renewable energy integration**

Sunway has very low transitional risk from technology changes for at least the next five to ten years due to its business model, which is primarily based on the purchase and leasing out of real estate, primarily commercial property.

**Market**

**Analysed shifts in market demand for sustainable properties, tenant preferences and investor expectations for environmentally responsible practices**

Sunway's business model has low market transitional risk, as lessons learnt from the previous lockdown have prepared the organisation to pivot and adapt swiftly to changes should there be another occurrence of pandemic-driven lockdowns.

**Reputation**

**Reviewed potential impacts on Sunway's brand and stakeholder trust due to sustainability performance or lack thereof**

Overall, Sunway's assets are assessed to have low reputational risk, supported by established governance, compliance with regulatory requirements, and responsible operating practices. Reputational impacts are generally limited, except in cases of unforeseen accidental or criminal incidents beyond the Company's control, where accountability would primarily rest with the operator of the leased property.

Within this broader context, Sunway maintains awareness of environmental sensitivities associated with developments in Johor, including areas near the Pendas River. These considerations are managed through responsible land use, adherence to environmental and development regulations, and ongoing stakeholder engagement to ensure transparency and alignment with community expectations.

**POLICY AND LEGAL RISK**


Medium term to long term


**The highest transition risk to Sunway's business model is the expected future cost of regulations on electricity and water usage, as national tariffs are expected to increase to expand the national renewable energy system in order to reach the national net zero targets.**


**Legend:**  Financial Position  Financial Performance  Cash Flow

**Medium to Long Term**

**Changes in Financial Performance and Cash Flows**

 The risk of policy changes affecting cash flow during the reporting period remains low. However, in the next reporting period, Sunway may experience higher annual electricity costs if the government's recent 14.2% increase in the base tariff is applied across all tariffs. Over the longer term, rising electricity and water tariffs could affect the Company's cash flow and overall financial performance.





**Mitigation Strategies**

**Direct Mitigation and Adaptation Efforts**

Renewable energy solutions have been deployed across various properties, currently supplying about 5% of total electricity consumption. To address water-related risks, additional measures such as expanding rainwater harvesting systems could help reduce exposure to rising water costs.

**Effects**

Sunway's electricity costs are expected to increase by approximately RM12.3 million or 11% from a base of RM110 million based on a benchmark GET add-on of 5 sen/kWh. A similar proportional increase may apply to water tariffs should water treatment plants transition to renewable energy.

**Indirect Mitigation and Adaptation Efforts**

Energy efficiency campaigns are implemented across Sunway's properties to lower energy use per unit area, supported by a penalty mechanism linked to the Company's ICP for underperformance. Water-related mitigation is primarily supported through operations of Sunway's water treatment plant, which serves as a key water source for Bandar Sunway properties.

**REPUTATION RISK**

Short term to long term

**Sunway may face potential reputation and stakeholder perception risk arising from environmental sensitivities associated with the Sunway City Iskandar Puteri (SCIP) project area adjacent to the Pendas River.**

**Legend:**  Financial Position  Financial Performance  Cash Flow

**Short to Long Term**

**Changes in Financial Performance and Cash Flows**



Initial concerns related to banking financing were addressed through transparent and proactive engagement, resulting in no subsequent issues with other financial institutions. With clearer understanding established and ongoing open communication, similar risks are not expected to recur.

**Effects**

There are no significant effects on Sunway's business model and value chain.

**Mitigation Strategies**

- Efforts have been taken to mitigate flooding as a reputational risk, such as improving sump pumps in carparks.
- In SCIP, developing a strategy to mitigate the environmental damage to the mangrove area would also be an indirect effort to mitigate climate change effects such as flooding.

**Net Zero Roadmap**

IFRS S2

Sunway's primary pathway to achieving net-zero carbon emissions by 2050 is to fully decarbonise its energy use through enhanced energy efficiency, transitioning from fossil-fuel vehicles to electric vehicles, expanding solar installations and purchasing renewable energy from the national grid, all of which present climate-related opportunities for the Company. We have installed solar panels across 34 properties, representing a total capital expenditure (CAPEX) of nearly RM30 million.

**Target-Setting Methodology**

- Aligned with a 1.5°C pathway consistent with the goals of the Paris Agreement.
- Baseline based on alignment with IPCC, stating global CO<sub>2</sub> emissions should decline by about 45% by 2030 relative to 2010 levels.
- BEI values guided by industry benchmarks such as the GBI and Singapore's BCA Benchmarking Report form the basis for deriving the emissions baseline.
- Progress is reviewed annually through ICP mechanisms.

**Strategies**

**ON TRACK TOWARDS ACHIEVING 2030 TARGETS**

We have set future value goals and 2030 targets to drive carbon reduction across our portfolios and cities.

**Strategic Framework:**

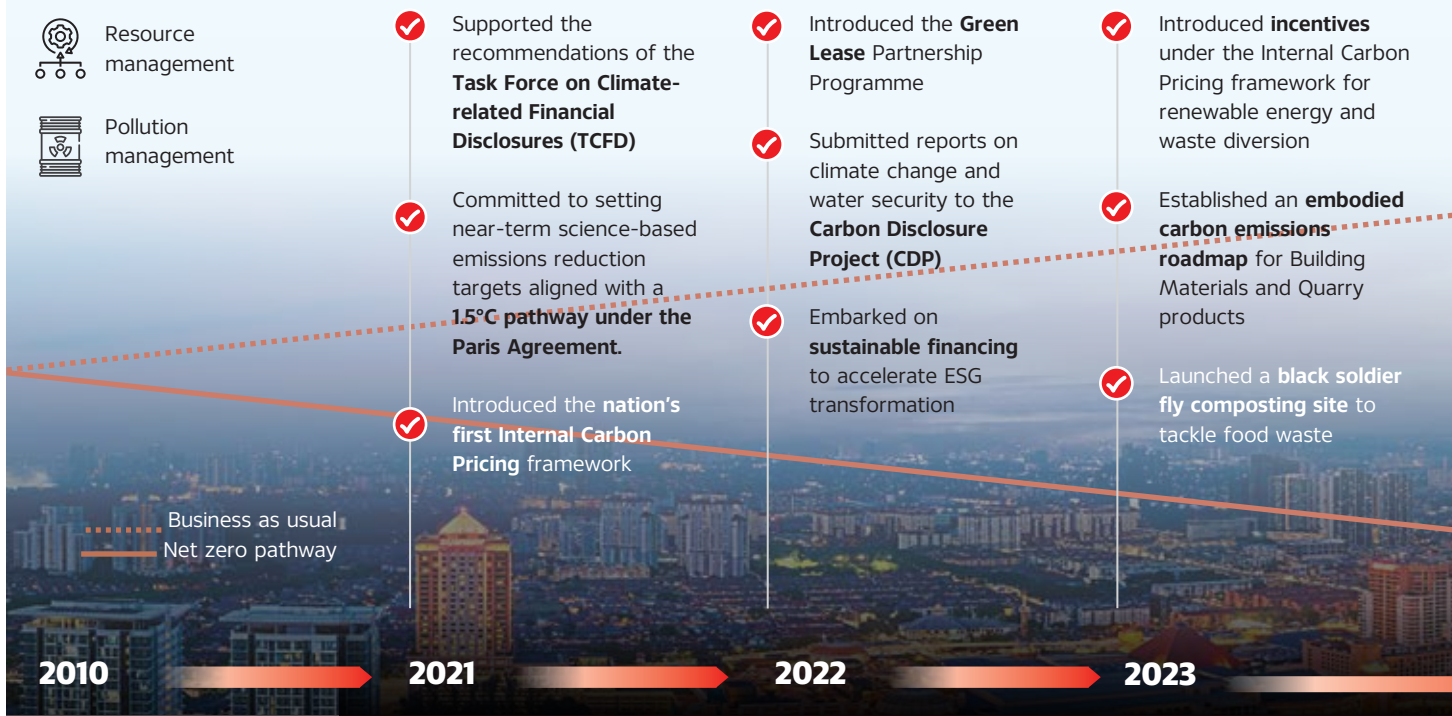
- Decarbonisation
- Resource management
- Pollution management

**SUNWAY'S NET ZERO CARBON EMISSIONS BY 2050 ROADMAP**

**ACCELERATING DECARBONISATION**

**Implementation:**

- Internal Carbon Pricing**
  - Emissions avoidance (Energy efficiency improvement, waste diversion)
  - Energy substitution (Renewable energy)
- Engaging with stakeholders to reduce Scope 3 emissions**
  - Upstream - Suppliers (Sustainable procurement and supply chain practices)
  - Downstream - Tenants (Green leases)



Targets

Annual	By 2030	By 2050
<p>Reduce Scope 2 and Scope 3* GHG emission intensity (tonnes CO<sub>2</sub>e/m<sup>2</sup>/year) at 3.5-4.0% annually through to 2030 using FY2022 as the baseline.</p> <p>* Scope 3 emissions only consist of emissions from tenants' energy consumption which are categorised under Category 13: Downstream Leased Assets.</p>	<p>Source at least 40% of the total electricity consumption from renewable energy sources (5% locally generated, 35% purchased from green sources/solar farms) by 2030</p>	<p>Achieve Net Zero GHG emissions across Scope 1, Scope 2 and Scope 3 emissions by 2050</p>

GETTING TO NET ZERO

- To achieve net zero carbon emissions by 2050, we plan to focus on carbon offset technology and have invested in a research centre for carbon dioxide capture and utilisation.
- Carbon offset is the last resort after we have maximised our resources.



Global temperature is estimated to rise between 4.0°C and 5.0°C above pre-industrial levels without any mitigation efforts.

Implementation:

- Carbon capture and storage
- Investment in large-scale renewable energy

By 2030, we will reduce our residual emissions by **45%**.

Global warming is limited to 1.5°C with mitigation efforts, in line with the Paris Agreement goal.

- Initiated efforts to evaluate and align with **IFRS S1 and S2**
- Installed more than 15 MWp of **rooftop solar PV** cells as of 2025
- Sunway Hotels & Resorts partnered with Saxon Renewables to launch a guest voluntary carbon offset programme, supporting certified climate and conservation projects across Southeast Asia

2024-2025

2030

2050

## Net Zero Roadmap

### CLIMATE RESILIENCE

Sunway adopts a proactive approach to adjusting its strategy and business model in response to climate change across the short, medium and long term. The Company's strong financial position and stable cash flow enable climate-risk mitigation without material strain. Short-term actions, such as drainage upgrades and routine maintenance, are budgeted annually, while medium- to long-term capital is reserved for major resilience projects to ensure sustained protection of assets across all sectors.

There is no significant risk of material adjustments to the Company's financial statements expected within the next annual reporting period, and Sunway faces no material technology- or market-driven transition risks to its business model. Rooftop damage from heavy rainfall poses a greater cost risk than flooding, which remains largely theoretical. Most rooftops across Sunway properties will require enhanced mitigation measures to address current and future water seepage, an issue expected to worsen over the next 80 years as rainfall intensity increases by 16%.

Sunway's forward-looking approach protects asset value and supports long-term growth in a changing climate. The Company continues to prioritise investments in flood prevention and sustainable building practices and plans to adopt nature-based solutions and climate-adaptive designs to enhance resilience and attract sustainability-oriented tenants and investors. A key part of this strategy is the inclusion of climate-risk assessments in all new property acquisitions and the long-term plan for each business division to monitor the need to purchase TNB's Green Electricity Tariff (GET) as part of Sunway's commitment to achieving net zero by 2050.

### Metrics and Targets

#### Emissions Reduction Targets

We are committed to accelerating our efforts to reduce residual emissions through improved energy efficiency and a transition to cleaner energy sources. Our managed assets and industrial sites are projected to remain within their reduction targets, achieving annual decreases of 3.5% to 4% in BEI and EUI up to 2030. This aligns with the IPCC goal of a 45% reduction in carbon emissions by 2030, as well as Malaysia's Nationally Determined Contribution (NDC) to lower carbon intensity per GDP by 45% from 2005 levels.

To improve energy efficiency, we have established energy intensity targets for our managed assets that account for both purchased electricity and renewable energy consumption. We benchmark our energy intensity baselines against recognised industry standards such as the Green Building Index (GBI) and Singapore's Building and Construction Authority (BCA)

Benchmarking Report. In addition, we have set emissions intensity targets covering Scope 2 and 3\* emissions, excluding renewable energy consumption as part of our transition to cleaner sources. Following a review of the latest benchmarking data, we have updated the energy intensity targets for our Healthcare division beginning in 2025, with 2024 performance recalculated based on the revised methodology.

Sunway is committed to ensuring that all buildings completed from 2025 onwards obtain green building certification, such as GreenRE and GBI. This commitment aligns with our broader climate goals and supports efforts to reduce electricity consumption and enhance energy efficiency across our developments.

To advance our ambition of achieving net zero carbon emissions by 2050, with an interim target of reducing GHG emissions by 45% by 2030, we have implemented a carbon pricing framework alongside a comprehensive climate strategy that includes:

- Expanding solar adoption across multiple business divisions to reduce dependence on fossil fuel-based electricity.
- Enhancing operational efficiency to lower energy use and emissions.
- Conducting risk assessments and mitigation planning to address both physical and transition risks associated with climate change.

In 2025, nearly all business divisions achieved their GHG emissions intensity targets, with the exception of the Leisure division, which faced operational challenges in reducing emissions. The following initiatives reaffirm Sunway's commitment to achieving its 2030 and 2050 emissions reduction targets, while ensuring continued alignment with global climate action frameworks and national regulatory requirements:

- ICP which assigns a monetary value to carbon emissions to guide investment and operational decisions.
- Renewable energy expansion, through the continuous installation of solar systems across our properties.
- Energy efficiency enhancements, implemented throughout our buildings and operations.

### Emissions Calculation Methodology

Sunway's GHG inventory is prepared in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and covers Scope 1, Scope 2, while Scope 3 emissions are calculated in accordance with the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Our organisational boundary is defined based on financial control, and is periodically reviewed to reflect our latest ownership structure and level of operational influence across business units. In FY2025, Sunway Berhad expanded its boundary to include its subsidiary, Sunway Construction, in emissions calculations.

Sunway's GHG accounting framework emphasises transparency, completeness, and consistency, supported by periodic boundary reviews to reflect changes in ownership. Emissions are calculated using activity data and standardised emission factors sourced from the Malaysian Energy Commission and the UK Department for Environment, Food and Rural Affairs (DEFRA).

In 2025, we continued to strengthen data quality and consistency across business divisions by applying harmonised methodologies and verified data. The Company has disclosed Scope 1 and Scope 2 emissions, as well as eight of the 15 Scope 3 categories determined to be relevant to our operations, providing a clearer and more comprehensive view of emissions across our core business areas. The financial control approach will be applied consistently across future reporting periods, supporting comparability and reinforcing alignment with the objectives of IFRS S2.

Entity Type	Treatment in Sunway Berhad's Scope 1 & 2	Treatment in Sunway Berhad's Scope 3
Parent (Sunway Berhad)	100% of consolidated emissions	100% of relevant upstream and downstream categories included
Subsidiaries	100% of consolidated emissions	100% of relevant upstream and downstream categories included
Associates	Not included	Included under Category 15 (Investments), based on the Company's equity share (%) of the investee's total Scope 1, Scope 2 and Scope 3 emissions



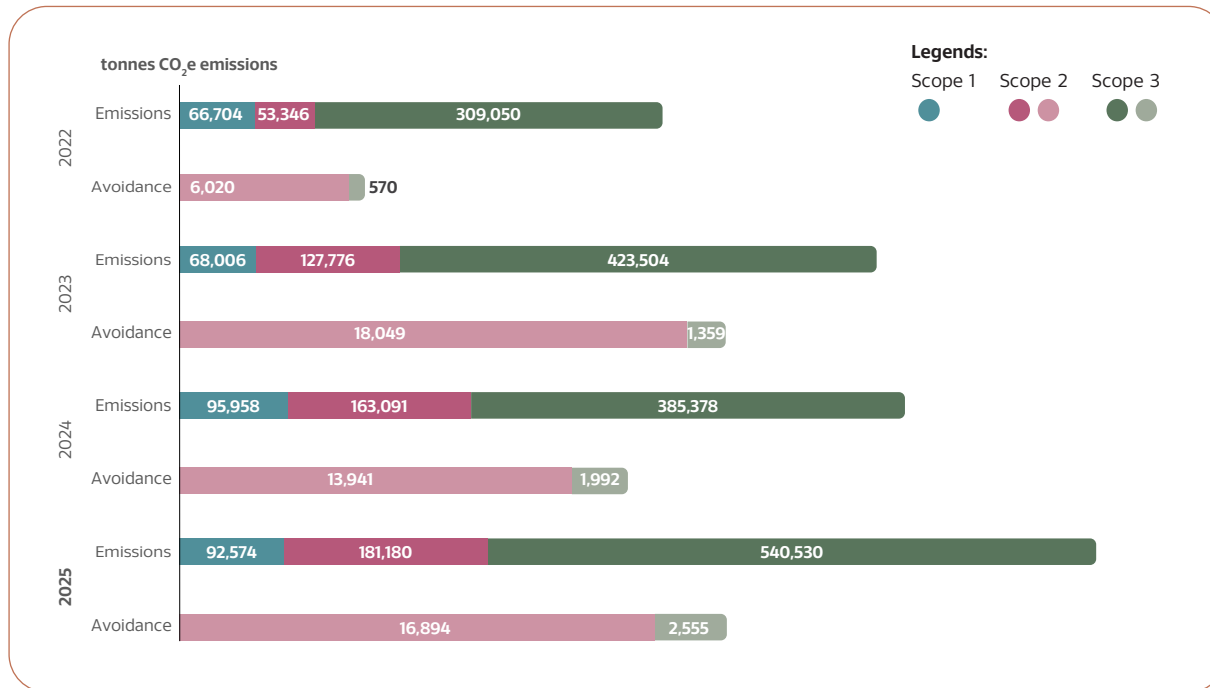
# Net Zero Roadmap

IFRS S2

## Our Performance

The increase in emissions from 2022 to 2025 is primarily due to the inclusion of Sunway Construction and Sunway REIT. The year-on-year rise in Scope 3 emissions reflects broader category coverage, while the higher Scope 2 emissions avoidance in 2025 is driven by renewable energy generation from Sunway Construction.

### TOTAL CO<sub>2</sub>e EMISSIONS AND CO<sub>2</sub>e EMISSIONS AVOIDANCE BY YEAR



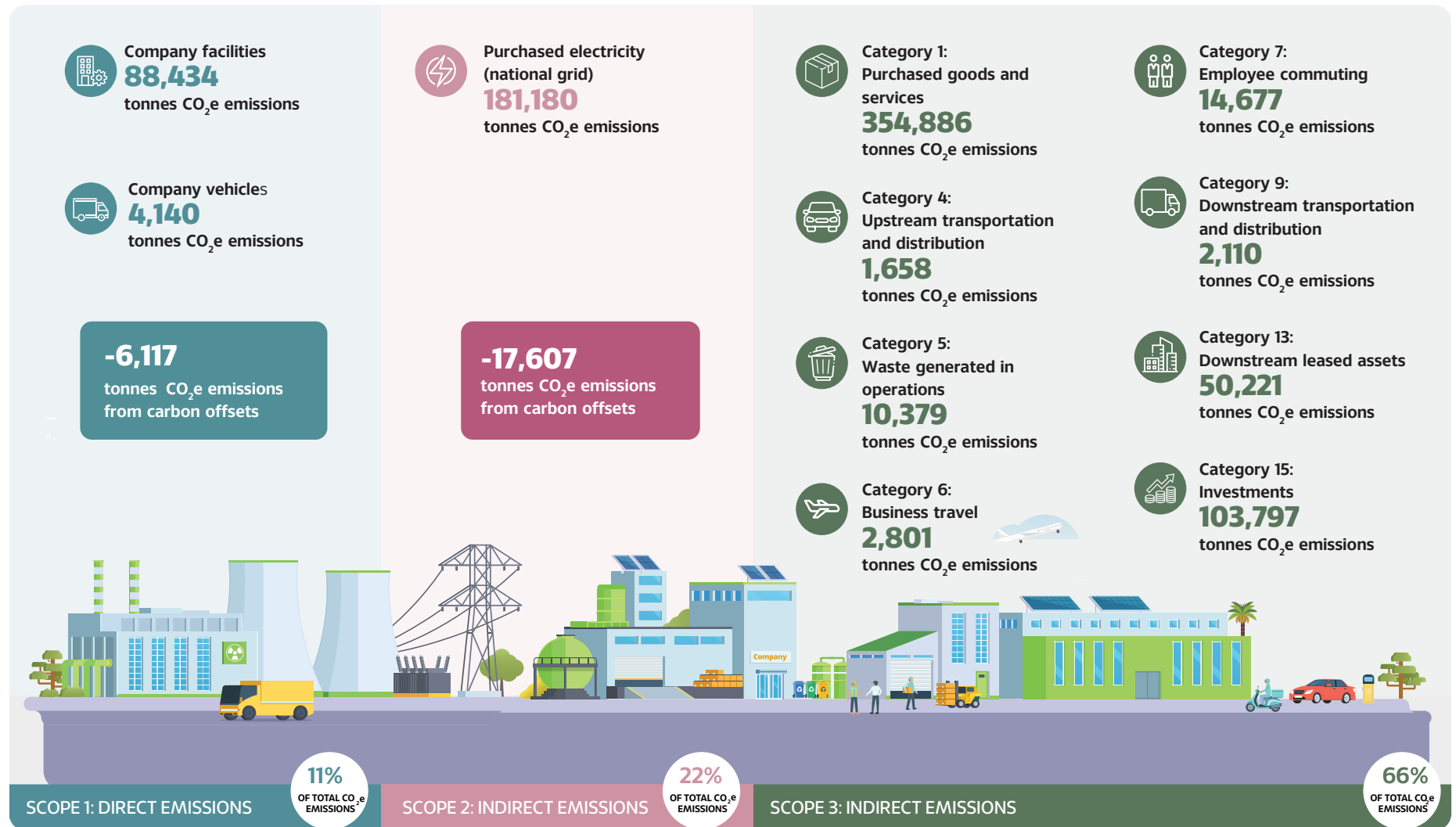
#### Emission Avoidance

- 16,894 tonnes CO<sub>2</sub>e emissions**
- 1,976 tonnes CO<sub>2</sub>e emissions**
- 579 tonnes CO<sub>2</sub>e emissions**
- 5,766 tonnes CO<sub>2</sub>e emissions**

Carbon sequestrated from 274,562 trees in Sunway townships<sup>1</sup>

<sup>1</sup> One tree absorbs approximately 21 kg of CO<sub>2</sub>e

TOTAL CO<sub>2</sub>e EMISSIONS IN 2025 (SCOPES 1, 2 AND 3)



Note: Figures stated may not add up due to rounding of decimals.

## Net Zero Roadmap

### Emissions Reduction Targets

We are determined to step up our efforts to reduce our residual emissions by improving energy efficiency and transitioning to cleaner energy. Our managed assets and industrial sites are expected to remain below the targets set, which are reduced annually by 3.5% to 4% up to 2030, in line with the IPCC target of a 45% reduction in carbon emissions by 2030. This is also in line with Malaysia's NDC to reduce carbon intensity against gross domestic product by 45% by 2030 relative to 2005 levels.

We benchmark our energy intensity target baseline against industry guidelines such as the GB and Singapore's Building and Construction Authority (BCA) Benchmarking Report. In addition, we have also set emissions intensity targets that include Scope 2 and 3\* emissions. Energy consumption from renewable energy is excluded from our emissions intensity performance as we transition towards the use of cleaner energy.

### Energy Intensity Targets

Business Division	Unit	Target									Performance
		2022	2023	2024	2025	2026	2027	2028	2029	2030	2025
Office	kWh/m <sup>2</sup>	150	144	138	133	127	122	117	113	108	120
Retail		350	336	323	310	297	285	274	263	252	258
Hospitality		290	278	231	222	213	205	197	189	181	188
Healthcare		342	328	315	329	316	303	291	279	268	296
Student & Healthcare Residence		104	100	96	92	88	85	81	78	75	82
Leisure	kWh/person	7.02	6.78	6.54	6.31	6.09	5.88	5.67	5.47	5.28	8.57

### Emissions Intensity Targets

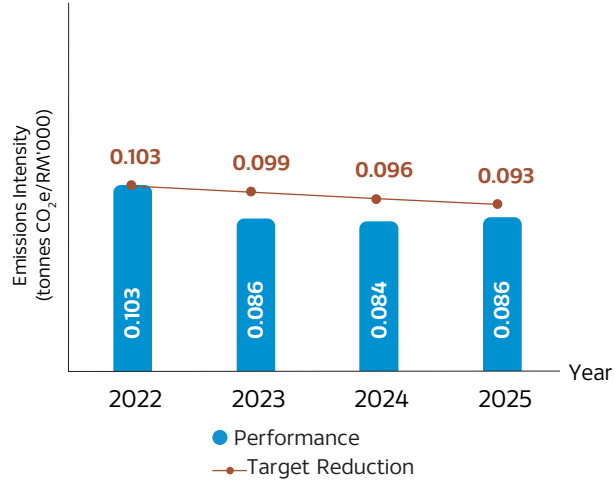
Business Division	Unit	Target									Performance	
		2022	2023	2024	2025	2026	2027	2028	2029	2030	2025	
Office	tonnes CO <sub>2</sub> e/m <sup>2</sup>	0.146	0.141	0.135	0.130	0.124	0.119	0.115	0.110	0.106	0.089	
Retail		0.297	0.286	0.274	0.263	0.253	0.243	0.233	0.224	0.215	0.199	
Hospitality		0.254	0.244	0.233	0.223	0.214	0.206	0.198	0.190	0.182	0.147	
Healthcare		0.255	0.245	0.235	0.246	0.236	0.226	0.217	0.209	0.200	0.230	
Student & Healthcare Residence		0.130	0.125	0.120	0.115	0.111	0.106	0.102	0.098	0.094	0.064	
Leisure	tonnes CO <sub>2</sub> e/person	0.0053	0.0051	0.0050	0.0048	0.0046	0.0045	0.0043	0.0041	0.0040	0.0064	
Building Materials	Sunway Paving Solutions	tonnes CO <sub>2</sub> e/ '000 m <sup>2</sup>	1.92	1.85	1.79	1.73	1.67	1.61	1.55	1.50	1.44	1.18
	Sunway Spun Pile		0.0160	0.0154	0.0149	0.0143	0.0138	0.0134	0.0129	0.0124	0.0120	0.0087
	Sunway VCP		0.80	0.77	0.74	0.72	0.69	0.67	0.64	0.62	0.60	0.66
Quarry	Premix Products	tonnes CO <sub>2</sub> e/tonnes	0.049	0.047	0.044	0.043	0.041	0.040	0.038	0.037	0.036	0.030
	Quarry Products		0.00191	0.00184	0.00178	0.00172	0.00166	0.00160	0.00154	0.00149	0.00144	0.00133

**Note:**

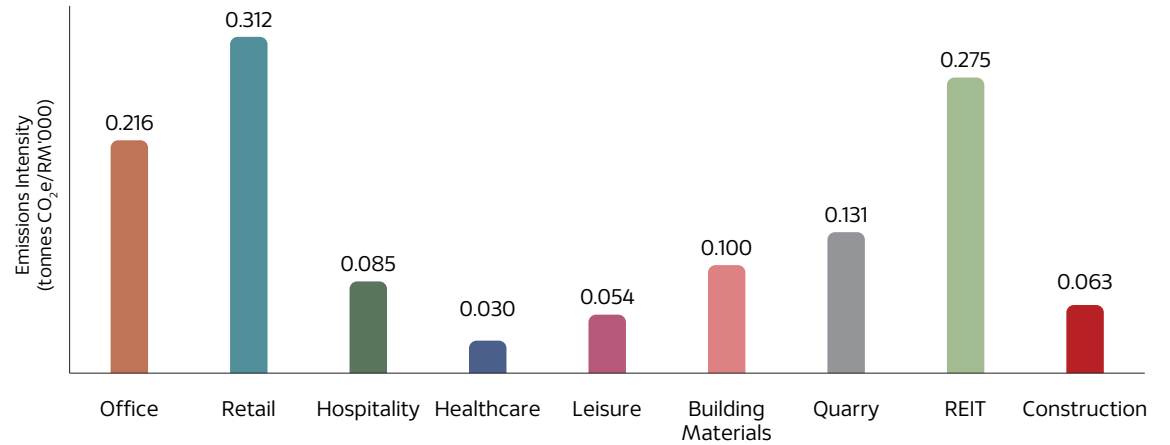
- Sunway REIT and Sunway Construction targets and performance are reported in their respective FY2025 sustainability report/statement.
- \* Scope 3 emissions only consist of emissions from tenants' energy consumption which are categorised under Category 13: Downstream Leased Assets.

Scope 1, 2 and 3 Emissions Intensity (tonnes CO<sub>2</sub>e/RM'000)

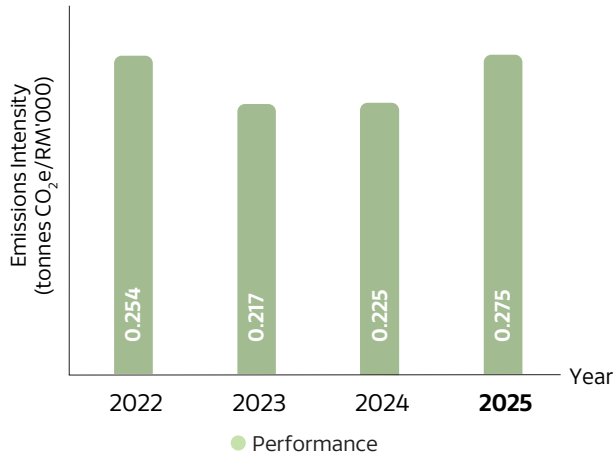
Overall Company



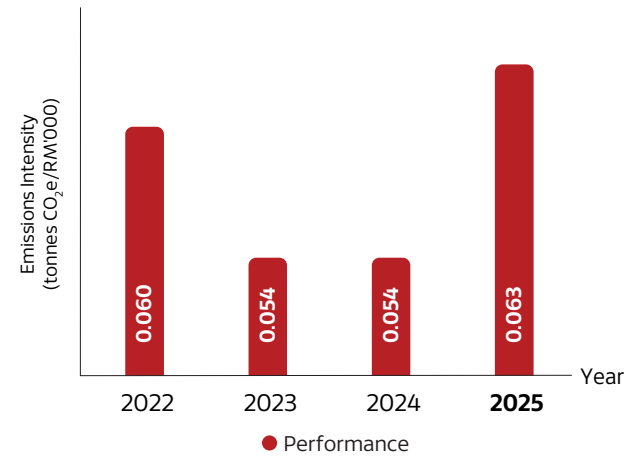
Scope 1, 2 and 3 Emissions Intensity by Business Divisions for 2025 (tonnes CO<sub>2</sub>e/RM'000)



REIT



Construction

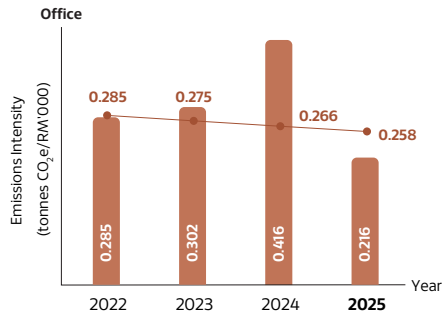


Notes:

- 1 Target reduction for Sunway REIT and Sunway Construction can be referred in their respective sustainability report/statement.
2. Scope 3 emissions consists of emissions from tenants' energy consumption, categorised under Category 13: Downstream Leased Assets and Sunway REIT's emissions, categorised under Category 15: Investments.
3. Sunway Construction's total emissions include only Scope 1 and Scope 2.

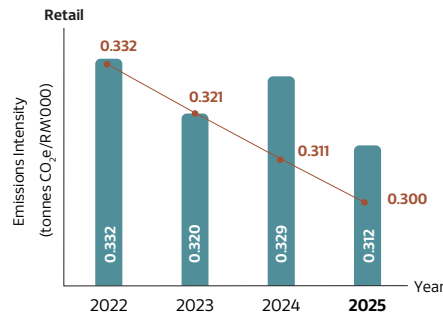
Net Zero Roadmap

Scope 1, 2 and 3 Emissions Intensity (tonnes CO<sub>2</sub>e/RM'000)



● Performance  
—● Target Reduction

Emissions intensity decreased by 24% from 2022



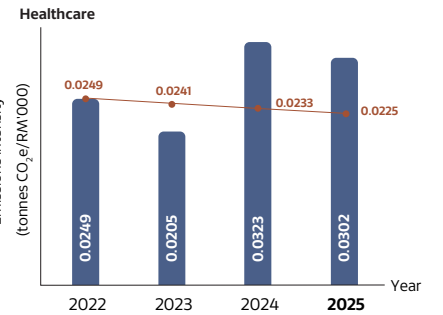
● Performance  
—● Target Reduction

Emissions intensity decreased by 6% from 2022



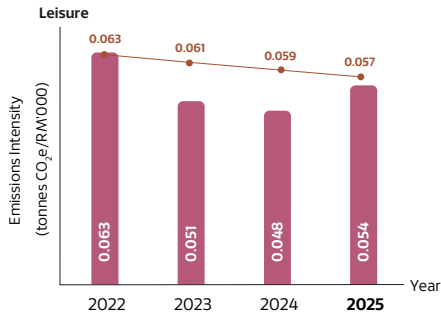
● Performance  
—● Target Reduction

Emissions intensity decreased by 26% from 2022



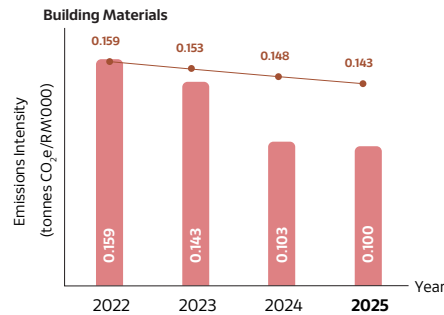
● Performance  
—● Target Reduction

Emissions intensity increased by 21% from 2022



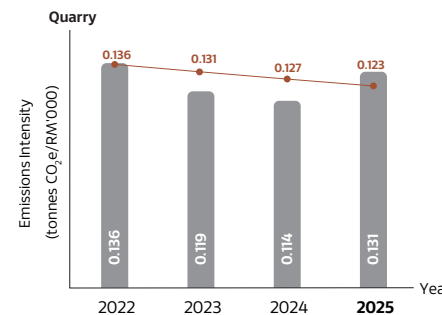
● Performance  
—● Target Reduction

Emissions intensity decreased by 14% from 2022



● Performance  
—● Target Reduction

Emissions intensity decreased by 37% from 2022



● Performance  
—● Target Reduction

Emissions intensity decreased by 3% from 2022

Notes:

1. Company refers to the following business divisions: Office, Retail, Leisure, Hospitality, Healthcare, Building Materials and Quarry.
2. Quarry only includes Sunway Quarry Industries.
3. Emissions per revenue are based on the latest available data, with a 3.3% target reduction applied. Figures reflect the most current information at the time of reporting and may be refined as part of ongoing data improvement efforts.

## ENERGY MANAGEMENT

Energy is a major component of Sunway's operating costs, with electricity expenses amounting to RM110 million annually. As the largest source of GHG emissions, energy use remains a key focus area in Sunway's sustainability strategy. The Retail division records the highest emissions intensity per RM earned, while the Building Materials division faces growing pressure to decarbonise due to the carbon-intensive nature of cement, steel, and concrete. Market demand for low-carbon materials such as green cement and recycled aggregates from developers and government projects further reinforces the need for greener operations and products. Energy management was ranked among Sunway's top seven material issues in the 2024 materiality assessment, driving resource allocation and mitigation priorities.

We have been consistent in our efforts to effectively manage the environmental footprint of our operations and activities. This includes investing in clean technology to transition towards renewable energy and further improving our energy, water and waste management, and adopting best practices in pollution control while actively promoting circular economy principles. In addition, we actively explore new solutions to reduce energy consumption and optimise operational efficiency across our operations.



### Scenario Analysis Methodology

Energy-management risks and opportunities are identified and assessed through a structured process that combines utility-billing records, energy audits, and continuous monitoring across all owned and managed property-investment assets. To enhance data accuracy, the Company has introduced automated data-validation routines.

Sunway's energy risk management centres on catering to the following demands:

1. **Demand for green operations** – ensuring that investment properties such as malls, offices, and hotels progress toward Net Zero operations to meet future tenant and customer expectations.
2. **Demand for green products** – reducing cradle-to-gate embodied carbon in production processes to maintain competitiveness and meet growing market demand for low-carbon building materials, especially in our trading and manufacturing division.



### Risks and Opportunities

Energy-related risks are fully integrated into the ERM Framework as value chain risks, with oversight provided by the Board Risk Committee, following escalation by the Group Risk Management Department. Further deliberation of the energy risks and opportunities is conducted through internal discussions involving the Company's risk, finance, and sustainability teams.

## Managing our Environmental Impact

Time Horizon	Risks	Opportunities	Changes in Financial Performance and Cash Flow	Mitigation Strategies
Short Term	<ul style="list-style-type: none"> <li>Rising utility costs may increase operating expenses and reduce overall profitability.</li> <li>Power failure could result in adverse operational and financial impact to divisions such as Retail and Healthcare.</li> </ul>	Implementing energy-saving initiatives and consumption of renewable energy can lower operational expenses and strengthen resilience against energy price fluctuations.	<p>Early gains from LED retrofits, chiller optimisation, and rooftop solar will free up working capital for reinvestment in low-carbon initiatives or to reduce short-term debt.</p> <p>Continued expansion of renewable energy, targeting 40% by 2030, is expected to generate cumulative savings of around RM80 million by the Company.</p>	<ul style="list-style-type: none"> <li>Improving energy efficiency and substituting with cleaner energy.</li> <li>Back-up generators and uninterrupted power supply systems ensure continuous power supply to essential equipment/areas</li> <li>Ensure disaster recovery procedures are in place to ensure safety and security measures are not impacted</li> </ul>
	Inefficient energy management and lack of low-carbon transition planning could lead to ESG non-compliance and exposure to higher operating and reputational risks.	Proactive investment in sustainable energy management systems supports compliance with green building standards, enhances brand reputation and provides access to green/transition financing programmes.	<p>Enhanced energy performance to achieve green building certifications will further support higher leasing rates and lower vacancy rates across office, retail, and hospitality assets.</p> <p>Sunway Berhad's sustainable finance commitments (&gt;RM500 million) are linked to sustainability targets, including BEI. Achieving BEI targets drives direct energy cost savings and may unlock financing incentives.</p>	Continuous implementation and enhancement of the Group's ICP mechanism and Green Lease Partnership Programme to incentivise energy efficiency and low-carbon operations.
Medium Term				
Long Term	Rising energy consumption and carbon emissions may hinder achievement of net zero and emission intensity targets, and increase exposure to future carbon pricing or regulatory penalties.	Long-term asset value preservation through adoption of low-carbon energy solutions.	Improved energy resilience insulates the Company from rising grid tariffs and carbon pricing, smoothing cash-flow volatility.	Improve energy performance through efficiency measures and low-carbon technologies, complemented by carbon offsets or CCUS where feasible, to stay on track with emission intensity targets.

### Current Effects

- Utilities spend of RM110 million in FY2025 (1% of revenue).
- Capital allocation: Nearly RM30 million invested in solar PV installation as of FY2025.

### Anticipated Effects

- Implementation of the mandatory GET is estimated to cost the Company RM12.3 million.
- Physical climate stress, such as heat waves, may increase cooling loads by 3–5% by 2030, requiring resilience investments in HVAC systems and building envelope upgrades.
- Opportunities to differentiate our assets remain strong, as green-certified buildings command 3–5% higher rental premiums and lower vacancy rates, enhancing asset valuations within our property investment portfolio.
- No sudden or unexpected costs are anticipated.
- With a target to reduce energy consumption by 4% year-on-year, potential annual savings are estimated at RM1.8 million, translating to total projected savings of over RM10 million between 2025 and 2030.



## Strategies

Sunway Berhad has embedded energy management into its core business strategy to enhance efficiency and reduce emissions. The Company employs a systematic approach that includes real-time monitoring of chiller and HVAC systems, continuous tracking through building management systems, and regular energy audits to identify opportunities to save energy. Energy performance is monitored under the ICP framework, with reductions in energy intensity aligned to Company-wide GHG emission targets. Sunway also applies lifecycle cost analysis when upgrading energy-intensive equipment, prioritising long-term efficiency and resilience over short-term savings.

### Energy Efficiency

The implementation of the following energy efficiency initiatives is an ongoing effort across our operations:

- Replacing conventional lights with LED lights
- Upgrading old electrical appliances and parts with newer, efficient ones
- Installing or replacing large appliances such as chillers, Air Handling Units (AHU), lifts and transformers
- Optimising air-conditioning temperatures to save energy
- Fixing motion sensors to detect movement and adjust lighting accordingly
- Turning off lights and reducing lighting at set hours every day
- Renovating buildings to maximise natural light and ventilation
- Applying Building Energy Management System (BEMS)
- Utilising smart meter systems

### Low-Carbon Energy Alternatives

Switch to cleaner fuels for business divisions with high energy consumption.

- Use of natural gas (NG) in kiln firing for Building Materials division
- Use of NG to heat aggregates in the Quarry division.



## Metrics and Targets

We monitor our energy performance through BEI and EUI across our business divisions. We have set year-on-year reduction targets of 4% from the 2022 base year through to 2030. The targets and corresponding performance are presented on page 52.

### Energy Conservation

- Raising awareness to minimise energy consumption through Earth Hour participation and quizzes.
- Optimising daily energy usage at all our properties according to occupancy and tenant utilisation.

### Renewable Energy

- Since 2018, we have been installing solar panels in our buildings to generate clean energy, cutting grid consumption by 5%. In 2025, we installed solar panels in 34 assets, generating 22 GWh renewable energy and avoiding more than 16,800 tCO<sub>2</sub>e emissions.

# Managing our Environmental Impact

## ENERGY CONSUMPTION

To support our energy reduction targets, we are stepping up efforts to reduce residual emissions by improving energy efficiency and transitioning to cleaner energy sources. In addition, we have established emissions intensity targets covering Scope 2 and Scope 3 emissions, as we advance towards cleaner energy use.

### Total Energy Consumption (MWh) By Business Division in 2025

**Purchased Electricity**  
417,969 MWh

**Renewable Energy**  
21,828 MWh

**Liquefied Petroleum Gas (LPG)**  
23,110 MWh

**Diesel**  
85,182 MWh

**Light Fuel Oil (LFO)**  
164,922 MWh

**Natural Gas (NG)**  
146,891 MWh

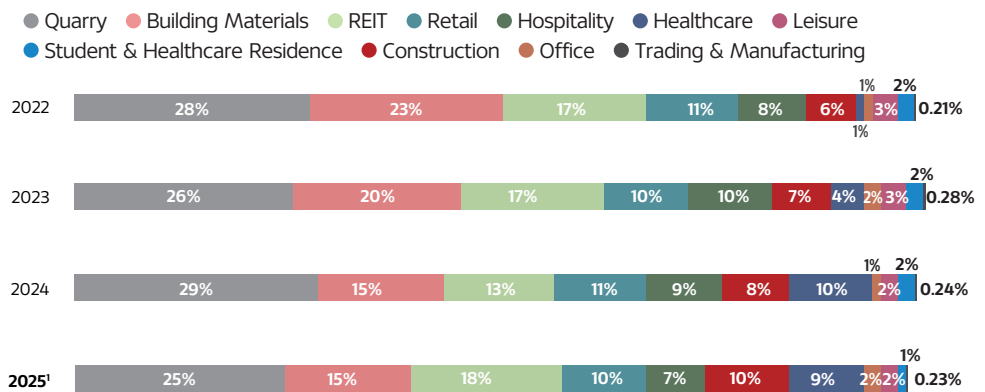
**Total:**  
859,902 MWh

**Note:**

- 1. Figures stated may not add up due to rounding of decimals.
- \* Renewable energy includes solar PV generation and purchase of GET.

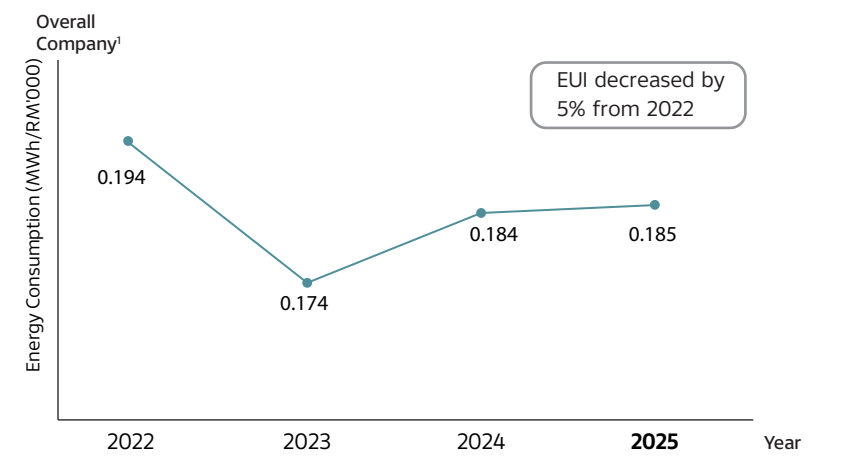
Retail	62,221 MWh 4,300 MWh 5 MWh 4,341 MWh 17,441 MWh	Student & Healthcare Residence	12,383 MWh 200 MWh
Hospitality	49,554 MWh 1,091 MWh 42 MWh 8,991 MWh 2,290 MWh	Building Materials	9,980 MWh 2,386 MWh 5,348 MWh 110,794 MWh
Healthcare	78,548 MWh 625 MWh 249 MWh 668 MWh 90 MWh	Trading & Manufacturing	2,021 MWh
Office	14,361 MWh 34 MWh	Quarry	18,705 MWh 24,773 MWh 164,922 MWh 6,272 MWh
Leisure	15,751 MWh 395 MWh 55 MWh 61 MWh	REIT	126,372 MWh 5,572 MWh 36 MWh 15,826 MWh 3,228 MWh
		Construction	28,073 MWh 7,225 MWh 54,672 MWh

### Total Energy Consumption (%) By Business Division



**Note:**  
<sup>1</sup> New properties added: Sunway V2 Tower

### ENERGY USE INTENSITY (MWh/RM'000)



**Note:**  
<sup>1</sup> Includes the following business divisions: Office, Retail, Hospitality, Healthcare, Leisure, Building Materials, Quarry, Sunway REIT and Sunway Construction.

## LABOUR PRACTICES & STANDARDS

Sunway continues to nurture a culture rooted in dignity, inclusion, equity, respect, and fairness. Our commitment extends to upholding every employee’s right to equal pay and opportunities, decent work, fair working hours, freedom of association, and a safe and healthy workplace, while prohibiting discrimination, forced labour, and child labour. These commitments are supported by robust policies and initiatives in full compliance with applicable laws and are continuously strengthened through regular engagement activities and feedback to ensure that the needs and expectations of our employees are met.

Our labour-related sustainability risks and opportunities are most pronounced in the Klang Valley, where Sunway has significant operational presence through developments such as Sunway City Kuala Lumpur, Sunway Velocity, and Sunway Putra. Areas with high employee concentration face greater exposure to workforce-management risks. At remote or dispersed sites, limited digital connectivity can hinder training access and internal communication, increasing operational vulnerability. Conversely, these conditions also present opportunities to strengthen workforce resilience by investing in digital infrastructure and remote learning platforms.

Across its operations, Sunway recognises that strong labour governance is fundamental to workforce well-being and operational integrity. Human capital, particularly permanent employees and key role holders, represents both a potential risk and a strategic opportunity. Sustained investment in talent development, mobility, and succession planning enhances long-term organisational capability and continuity. Respect for employees’ rights to freedom of association and collective bargaining remains integral to maintaining open dialogue and mutual trust. As workforce expectations and regulatory standards evolve, the Company continues to embed ethical labour practices and safeguard fair employment conditions throughout its value chain.

### Scenario Analysis Methodology

We ensure the consideration of potential risks among our management during workforce planning discussions and compliance reviews. Our consideration of risks and opportunities related to labour standards and practices are evaluated through various methods. Our sustainability-related risks are identified using quantitative methods, by emphasising those that could cause reputational damage or operational disruption.

### Quantitative Metrics



Turnover rates



Completion rate of mandatory Anti Bribery & Corruption Policy



Average learning hours



These metrics help determine potential impacts on operational continuity, and excellence. Meanwhile, opportunities are identified through employee feedback and benchmarking exercises to improve workplace conditions, well-being, and retention. These risks and opportunities relating to Labour Practices & Standards are integrated into the Company’s ERM framework, as people risk, ensuring that labour-related matters are assessed and monitored alongside other material business risks.

## Human Capital

IFRS S1



**Risks and Opportunities**

Time Horizon	Risks	Opportunities	Changes in Financial Performance and Cash Flow	Mitigation Strategies
Short Term	Limited digital connectivity at remote or dispersed sites can impede access to essential training and internal communication, particularly regarding the delivery of mandatory compliance and safety protocols.	Reduced training delivery costs over time through scalable digital learning platforms.	Increase in short-term operating costs from investment in digital infrastructure and transition to e-learning platforms.	Expand e-learning platforms and virtual training programmes that can be accessed from various remote locations.
	Increase in employee turnover and inability to attract key talent.	<ul style="list-style-type: none"> <li>Strategic investment in compensation and recruitment can attract higher-calibre talent, improving operational efficiency and long-term business performance.</li> <li>Strengthen employer brand and market positioning.</li> </ul>	Higher operating expenses from compensation and recruitment-related costs may reduce operating margins and profitability.	<ul style="list-style-type: none"> <li>Strengthen talent retention and engagement through competitive remuneration structures, clear career progression pathways, performance-based incentives, and employee well-being initiatives to reduce turnover and recruitment costs.</li> <li>Enhance employer branding and talent development programmes to attract and retain critical skills, supported by initiatives such as the Sunway Career Fair (locally and internationally) and Sunway's Management Associate Programme.</li> </ul>
Long Term	Weakened organisational capacity due to leadership gaps and reduced employee engagement.	Sustained revenue growth supported by strong leadership and organisational capability.	Lower organisational productivity and operational efficiency may negatively impact revenue generation and increase unit operating costs.	Succession planning, leadership capability development, and proactive employee engagement initiatives to ensure leadership continuity and organisational resilience.

**Current Effects**

- Labour-related costs including training, benefits and systems amounted to approximately RM111 million in FY2025.

**Anticipated Effects**

- Labour-related costs which include training, benefits and systems are expected to rise 10% year-on-year.
- Talent shortages may drive increasing adoption of automation, outsourcing, or simplification of services.
- Stricter labour regulations are expected to increase both compliance and operational costs.



## Strategies

Sunway's labour management strategy embeds sustainability principles into workforce governance, talent development, and employee well-being. The Company has expanded training and reskilling initiatives, and promoted diversity, equity, and inclusion across its workforce.

Planned initiatives focus on advancing the digital transformation of HR systems to enhance accessibility and consistency in workforce development. This includes expanding e-learning platforms and virtual training programmes, particularly for employees at remote or dispersed sites. Complementary efforts will include structured succession planning, greater talent mobility across business units, and leadership pipeline development to build a resilient, skilled, and future-ready workforce.

While short-term investments in employee welfare increase operating costs, these initiatives reduce operational risks and strengthen workforce stability over time. In the medium to long term, improvements in retention, productivity, and workforce capability are expected to enhance business continuity and support sustainable growth.



## Metrics and Targets

We aim to maintain robust labour governance through continuous monitoring of key workforce indicators: employee turnover rate, average learning hours, and completion rate of mandatory Anti Bribery & Corruption Policy. Turnover is measured as a percentage of total employees, while average learning hours are tracked through internal HR systems and the Learning Management System (LMS). These metrics are reviewed annually to evaluate workforce capability and stability, with ongoing efforts to improve data quality and completeness across all divisions.

Our workforce targets are benchmarked against national and industry standards. These targets will continue to be reviewed annually to align with emerging labour trends and evolving workforce expectations, supporting ongoing improvements in engagement, capability development, and productivity.

Metrics	Targets	2025 Performance
Turnover Rate	12% - 16%	<b>2,006 (14%)</b> employees
Mandatory Completion of Anti Bribery & Corruption Policy <sup>1</sup>	100%	<b>92%</b>
Average Learning Hours per Employee	40 hours	<b>44</b> hours

**Note:**

<sup>1</sup> Includes part-timers and foreign workers

**DATA PRIVACY AND CYBERSECURITY**

Sunway's business operations rely extensively on digital platforms, cloud-based systems, and interconnected data networks to support daily transactions and stakeholder engagement. The Company manages significant volumes of personal, financial, and operational data from customers, tenants, patients, and business partners, making data privacy and cybersecurity critical to its operational resilience and regulatory compliance.

In Malaysia, Sunway faces heightened regulatory exposure under the Personal Data Protection Act 2010 (Amendment 2024) and the Cybersecurity Act, while regional and international operations are subject to varying cross-border data governance frameworks such as the GDPR and ASEAN standards. Risks are primarily concentrated within on-premise data centres, cloud environments, and shared corporate systems that manage human resource, finance, and customer data. The Company also depends on external vendors and digital service providers whose systems introduce additional vulnerabilities. These factors collectively influence Sunway's ability to maintain business continuity, protect stakeholder information, and comply with evolving regulatory requirements.



**Scenario Analysis Methodology**

Sunway has prioritised initiatives to strengthen its governance framework and digital resilience in response to the regulatory, reputational, and operational significance of data privacy and cybersecurity. The Company adopts a data-driven approach, using both internal and external sources to identify and assess risks across all business divisions. This integrated monitoring framework extends across all major operational sectors, encompassing digital services, customer data management, and new business initiatives. It provides comprehensive visibility of data privacy and cybersecurity risks throughout Sunway's digital ecosystem.



Focus Area	Purpose	Sources/Tools
Regulatory & Compliance Intelligence	Track legal and policy changes; ensure alignment with national standards	PDPA 2010 (Amendment 2024), Cybersecurity Act, Securities Commission Malaysia's Technology Risk Management, ISO/IEC 27001:2022 updates, stakeholder feedback
Operational & System Assurance	Evaluate control effectiveness and detect emerging threats	IT audits, security posture assessments, Security Operations Centre (SOC) monitoring and incident response data

The simulated scenarios were selected based on their potential impact on Sunway's value chain and core business operations, where digital platforms, customer interfaces, and data management systems are integral to service delivery. These scenarios include ransomware attacks disrupting critical systems, third-party vendor breaches exposing customer data, unauthorised data access compromising confidentiality, and inaccurate or poor-quality data affecting compliance and decision-making.

**Data Privacy**

Scenario	Description	Assessed Impact
 Unauthorised access	Insider or external actor gains authorised access to sensitive personal data	Breach of confidentiality, regulatory non-compliance, reputational damage
 Inaccurate or Poor-Quality Data	Critical data elements are incomplete, inaccurate, or outdated, affecting decision-making and compliance reporting	Operational inefficiencies, inaccurate disclosures, regulatory breaches

**Cybersecurity**

Scenario	Description	Assessed Impact
 Ransomware Attack	Simulating a large-scale ransomware event disrupting critical business systems for 72 hours	Prolonged service disruption and loss of system availability, potential data exfiltration leading to confidentiality breach, possible regulatory non-compliance, financial loss, and reputational damage
 Third-Party Vendor Breach	Breach at a key cloud or fintech vendor exposing customer data	Data confidentiality breach, regulatory exposure, contractual liability, reputational damage, and customer churn

Each identified risk is assessed using a structured methodology aligned with ISO 27005. Business processes and related assets are classified by confidentiality, integrity, and availability, then mapped to relevant threats and vulnerabilities. Likelihood is determined using measurable factors such as occurrence rate and threat level, while magnitude reflects potential financial, operational, and reputational effects. Existing controls are reviewed to calculate residual risk, and significant exposures are escalated for mitigation.

Data privacy and cybersecurity are recognised as digital infrastructure risks within Sunway's ERM framework. They are prioritised alongside financial, operational, and sustainability-related risks, particularly when a single event could affect compliance, reporting accuracy, or stakeholder confidence. This integration ensures a consistent and transparent approach to managing data-related risks across the organisation.



**Risks and Opportunities**

As the Company expands its use of cloud, AI, and smart technologies, new risks emerge alongside opportunities to enhance resilience and efficiency. Sunway continuously assesses these factors to strengthen compliance, protect information assets, and leverage digital innovation as a driver of sustainable growth.

Time Horizon	Risks	Opportunities	Changes in Financial Performance and Cash Flow	Mitigation Strategies
Short Term	Regulatory fines, data breaches, and reputational damage due to compliance gaps under the PDPA 2010 (Amendment 2024) and Cybersecurity Act.	Reduced legal, remediation, and compliance costs through improved regulatory alignment.	Increase in operating costs due to compliance investments (policy updates, training, governance frameworks).	<ul style="list-style-type: none"> <li>Periodic review of the PDPA Compliance Manual, Data Governance Framework, and evolving cybersecurity threat landscape</li> <li>Reviewed and updated privacy notices, embedded consent mechanisms, and appointed Data Protection Officers (DPOs) across all relevant business units (healthcare, retail, property, education, hospitality) to comply with PDPA 2010 (amendment 2024).</li> </ul>
Medium Term	Ransomware attacks from emerging technologies such as AI, coupled with limited data privacy awareness, expanding IT ecosystems, and increasingly sophisticated cyber threats. Additionally, vendor and third-party dependencies introduce systemic vulnerabilities across Sunway's value chain.	Cost efficiencies from stronger data governance and cybersecurity, reducing incident response and recovery expenses.	Reduction in incident-related costs (e.g. ransomware recovery, legal liabilities, business interruption losses).	<ul style="list-style-type: none"> <li>Enhance incident reporting processes and run phishing simulations.</li> <li>Perform immediate VAPT and risk assessments for critical systems.</li> </ul>
Long Term	Future regulatory changes, evolving AI-enabled cyber threats, and differing international compliance standards may challenge Sunway's data governance and expansion plans.	New revenue opportunities enabled by trusted data ecosystems (e.g. data-driven services, partnerships).	Revenue growth from data-driven offerings and digital innovation, enabled by strong governance foundations.	<ul style="list-style-type: none"> <li>Implement centralised tools (data catalog, classification and lineage) to ensure consistent compliance and operational efficiency across all relevant business units.</li> <li>Familiarise and expand the implemented tools with more features, eg: data protection, Master Data Management (MDM) etc.</li> <li>Strengthen security operations with AI-driven detection and continuous monitoring.</li> </ul>

**Current Effects**

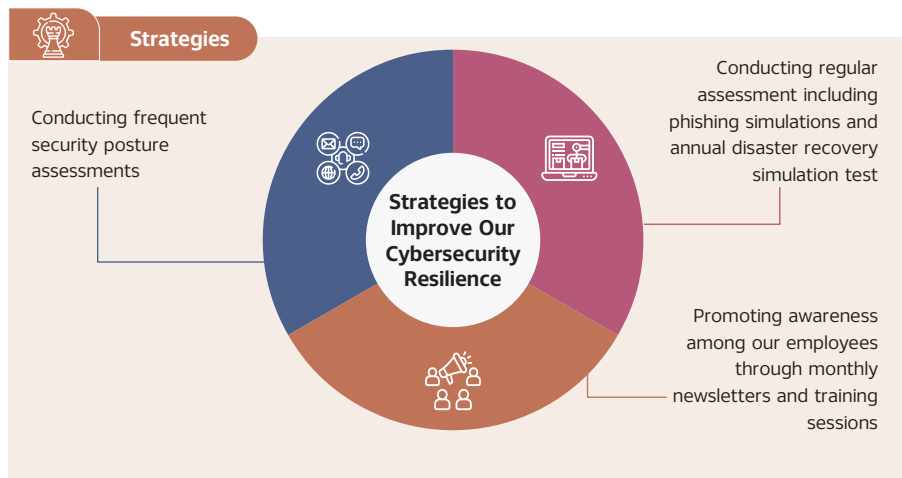
- Higher operational costs from strengthening cybersecurity infrastructure, implementing PDPA compliance measures, and enhancing employee awareness.

**Anticipated Effects**

- The possibility of a large-scale ransomware event can cause substantial business revenue loss and severe operational disruption, triggering insurance claims and urgent regulatory reporting obligations.
- Breaches originating from third-party cloud or fintech vendors are likely to result in significant liability exposure, contractual penalties, and a high rate of customer churn.
- Any single cybersecurity or privacy event is anticipated to undermine stakeholder confidence.

## Data Privacy and Cybersecurity

Safeguarding data integrity and ensuring cyber resilience remain central to Sunway's commitment to responsible digital governance. As our operations become increasingly data-driven, we continue to strengthen both our technological defenses and human vigilance to protect the confidentiality, integrity, and availability of information across all business units.



Building on these initiatives, we made measurable progress in embedding robust data protection practices across all business units during the reporting year. Guided by evolving regulatory requirements and our internal governance standards, we focused on strengthening accountability, improving employee awareness and tightening system safeguards.

To support this, we rolled out the Sunway Group Cybersecurity Policy Compliance programme, reinforcing consistent understanding of cybersecurity and data protection responsibilities across the Company. This was complemented by phishing simulations, regular cybersecurity communications and a dedicated enquiry channel to facilitate timely guidance and coordination among data owners.

We also strengthened internal data privacy governance through updated policies and guidance aligned with the PDPA amendments, alongside initiatives to enhance awareness and knowledge-sharing across the organisation. Looking ahead, we are evaluating a cloud-based data governance and data catalogue tool targeted for approval by end-2025 to further enhance data governance, visibility and data integrity across the Company.

### Metrics and Targets

Building on these initiatives, we made measurable progress in embedding robust data protection practices across all business units during the reporting year. Guided by evolving regulatory requirements and our internal governance standards, we focused on strengthening accountability, improving employee awareness, and tightening system safeguards.

**Quantitative Progress**

- Allocated RM200,000 for data governance and privacy initiatives
- Appointed 11 Data Protection Officers (DPOs) across all business units
- Conducted frequent vulnerability assessments and penetration tests, resolving all high-risk findings
- Recorded zero regulatory fines or penalties related to privacy or cybersecurity

**Qualitative Progress**

- Implemented key PDPA 2010 (Amendment 2024) requirements, including updated privacy notices and breach protocols
- Integrated data privacy governance into the Company's annual reporting, ensuring Board-level visibility
- Introduced mandatory cybersecurity due diligence for vendor onboarding processes

**2025 Targets and Performance**

- Zero** major data breaches, measured by the number of reported breaches
- Zero** incidents of identified data leaks, thefts or loss
- 100%** of employees trained annually on PDPA compliance, data governance, and cybersecurity<sup>1</sup>

**Note:**  
<sup>1</sup> Excludes part-timers and foreign workers

## IFRS S1 Content Index

IFRS code	IFRS S1 Disclosure	Section	Page Reference
S1	General Requirements for Disclosure of Sustainability-related Financial Information		
<b>Reporting entity</b>			
20	An entity's sustainability-related financial disclosures shall be for the same reporting entity as the related financial statements.	About This Report	1
<b>Connected information</b>			
21(a)	The connections between the items to which the information relates – such as connections between various sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects	About This Report	
21(b)	The connections between disclosures provided by the entity: (i) within its sustainability-related financial disclosures – such as connections between disclosures on governance, strategy, risk management and metrics and targets; and (ii) across its sustainability-related financial disclosures and other general purpose financial reports published by the entity – such as its related financial statements	About This Report	1
22	An entity shall identify the financial statements to which the sustainability-related financial disclosures relate.	About This Report	
23	Data and assumptions used in preparing the sustainability-related financial disclosures shall be consistent – to the extent possible considering the requirements of IFRS Accounting Standards or other applicable GAAP – with the corresponding data and assumptions used in preparing the related financial statements	About This Report	
24	When currency is specified as the unit of measure in the sustainability-related financial disclosures, the entity shall use the presentation currency of its related financial statements.	All financial information is disclosed in Malaysian Ringgit (RM).	
<b>Governance</b>			
27(a)(i)	To achieve this objective, an entity shall disclose information about: the governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of sustainability-related risks and opportunities. Specifically, the entity shall identify that body(s) or individual(s) and disclose information about: (i) how responsibilities for sustainability-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s)	Board Sustainability Committee	18
27(a)(ii)	How the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to sustainability-related risks and opportunities	Board Sustainability Committee	
27(a)(iii)	How and how often the body(s) or individual(s) is informed about sustainability-related risks and opportunities	Board Sustainability Committee	

## IFRS S1 Content Index

IFRS code	IFRS S1 Disclosure	Section	Page Reference
<b>S1</b>	<b>General Requirements for Disclosure of Sustainability-related Financial Information</b>		
<b>27(a)(iv)</b>	How the body(s) or individual(s) takes into account sustainability-related risks and opportunities when overseeing the entity's strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities	Board Sustainability Committee	
<b>27(a)(v)</b>	How the body(s) or individual(s) oversees the setting of targets related to sustainability-related risks and opportunities, and monitors progress towards those targets (see paragraph 51), including whether and how related performance metrics are included in remuneration policies	Board Sustainability Committee	
<b>27(b)(i)</b>	Management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities, including information about:(i) Whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee	Board Sustainability Committee	18
<b>27(b)(ii)</b>	Whether management uses controls and procedures to support the oversight of sustainability-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions	Board Sustainability Committee	
<b>Strategy</b>			
<b>29(a)</b>	The sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects (see paragraphs 30–31)	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	
<b>29(b)</b>	The current and anticipated effects of those sustainability-related risks and opportunities on the entity's business model and value chain (see paragraph 32)	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	61-62 90 145
<b>29(c)</b>	The effects of those sustainability-related risks and opportunities on the entity's strategy and decision-making (see paragraph 33)	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	
<b>29(d)</b>	The effects of those sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period, and their anticipated effects on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how those sustainability-related risks and opportunities have been factored into the entity's financial planning (see paragraphs 34–40)	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	61-62 90 145
<b>29(e)</b>	The resilience of the entity's strategy and its business model to those sustainability-related risks (see paragraphs 41–42)	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	63 91 146

IFRS code	IFRS S1 Disclosure	Section	Page Reference
S1	General Requirements for Disclosure of Sustainability-related Financial Information		
<b>Sustainability-related risks and opportunities</b>			
30(a)	Describe sustainability-related risks and opportunities that could reasonably be expected to affect the entity's prospects	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	
30(b)	Specify the time horizons – short, medium or long term – over which the effects of each of those sustainability-related risks and opportunities could reasonably be expected to occur	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	<p>61-62</p> <p>90</p> <p>145</p>
30(c)	Explain how the entity defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the entity for strategic decision-making	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	
<b>Business model and value chain</b>			
32(a)	A description of the current and anticipated effects of sustainability-related risks and opportunities on the entity's business model and value chain	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	<p>61-62</p> <p>90</p> <p>145</p>
32(b)	A description of where in the entity's business model and value chain sustainability-related risks and opportunities are concentrated (for example, geographical areas, facilities and types of assets).	<ul style="list-style-type: none"> <li>- Energy Management</li> <li>- Labour Practices &amp; Standards</li> <li>- Data Privacy and Cybersecurity</li> </ul>	<p>61-64</p> <p>89-91</p> <p>144-146</p>

## IFRS S1 Content Index

IFRS code	IFRS S1 Disclosure	Section	Page Reference
S1	General Requirements for Disclosure of Sustainability-related Financial Information		
<b>Strategy and decision-making</b>			
33(a)	How the entity has responded to, and plans to respond to, sustainability-related risks and opportunities in its strategy and decision-making	<ul style="list-style-type: none"> <li>- Energy Management Strategies</li> <li>- Labour Practices &amp; Standards: Strategies</li> <li>- Safeguarding Data Integrity and Cyber Resilience</li> </ul>	63
33(b)	The progress against plans the entity has disclosed in previous reporting periods, including quantitative and qualitative information	<ul style="list-style-type: none"> <li>- Energy Management Strategies</li> <li>- Labour Practices &amp; Standards: Strategies</li> <li>- Safeguarding Data Integrity and Cyber Resilience</li> </ul>	91
33(c)	Trade-offs between sustainability-related risks and opportunities that the entity considered (for example, in making a decision on the location of new operations, an entity might have considered the environmental impacts of those operations and the employment opportunities they would create in a community)	<ul style="list-style-type: none"> <li>- Energy Management Strategies</li> <li>- Labour Practices &amp; Standards: Strategies</li> <li>- Safeguarding Data Integrity and Cyber Resilience</li> </ul>	146
<b>Financial position, financial performance and cash flows</b>			
34(a)	The effects of sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period (current financial effects)	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	61-62
34(b)	The anticipated effects of sustainability-related risks and opportunities on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how sustainability-related risks and opportunities are included in the entity's financial planning	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	145

IFRS code	IFRS S1 Disclosure	Section	Page Reference
<b>S1</b>	<b>General Requirements for Disclosure of Sustainability-related Financial Information</b>		
<b>35(a)</b>	How sustainability-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	
<b>35(b)</b>	The sustainability-related risks and opportunities identified in paragraph 35(a) for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements	Not applicable. There are no significant risks of material adjustments to Sunway's related financial statements.	
<b>35(c)(i)</b>	How the entity expects its financial position to change over the short, medium and long term, given its strategy to manage sustainability-related risks and opportunities, taking into consideration:(i) its investment and disposal plans (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements), including plans the entity is not contractually committed to	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	61-62 90
<b>35(c)(ii)</b>	Its planned sources of funding to implement its strategy	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	145
<b>35(d)</b>	How the entity expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage sustainability-related risks and opportunities	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	
<b>40</b>	If an entity determines that it need not provide quantitative information about the current or anticipated financial effects of a sustainability-related risk or opportunity applying the criteria set out in paragraphs 38–39, the entity shall		
<b>40(a)</b>	Explain why it has not provided quantitative information	As of this reporting period, Sunway is continuing to develop the internal capabilities and analytical tools required to provide accurate and reliable quantitative financial information for its sustainability-related risks and opportunities.	
<b>40(b)</b>	Provide qualitative information about those financial effects, including identifying line items, totals and subtotals within the related financial statements that are likely to be affected, or have been affected, by that sustainability-related risk or opportunity	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> </ul>	61-62 90 145

## IFRS S1 Content Index

IFRS code	IFRS S1 Disclosure	Section	Page Reference
<b>S1</b>	<b>General Requirements for Disclosure of Sustainability-related Financial Information</b>		
<b>40(c)</b>	Provide quantitative information about the combined financial effects of that sustainability-related risk or opportunity with other sustainability-related risks or opportunities and other factors unless the entity determines that quantitative information about the combined financial effects would not be useful	As of this reporting period, Sunway is continuing to develop the internal capabilities and analytical tools required to provide accurate and reliable quantitative financial information for its sustainability-related risks and opportunities.	
<b>Resilience</b>			
<b>41</b>	An entity shall disclose information that enables users of general purpose financial reports to understand its capacity to adjust to the uncertainties arising from sustainability-related risks. An entity shall disclose a qualitative and, if applicable, quantitative assessment of the resilience of its strategy and business model in relation to its sustainability-related risks, including information about how the assessment was carried out and its time horizon. When providing quantitative information, an entity may disclose a single amount or a range	<ul style="list-style-type: none"> <li>- Energy Management: Risks and Opportunities</li> <li>- Energy Management: Strategies</li> <li>- Labour Practices &amp; Standards: Risks and Opportunities</li> <li>- Labour Practices &amp; Standards: Strategies</li> <li>- Data Privacy and Cybersecurity: Risks and Opportunities</li> <li>- Safeguarding Data Integrity and Cyber Resilience</li> </ul>	<ul style="list-style-type: none"> <li>61-62</li> <li>63</li> <li>90</li> <li>91</li> <li>145</li> <li>146</li> </ul>
<b>Risk management</b>			
<b>44(a)(i)</b>	The inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes)	<ul style="list-style-type: none"> <li>- Energy Management: Scenario Analysis Methodology</li> <li>- Labour Practices &amp; Standards: Scenario Analysis Methodology</li> <li>- Data Privacy and Cybersecurity: Scenario Analysis Methodology</li> </ul>	61
<b>44(a)(ii)</b>	Whether and how the entity uses scenario analysis to inform its identification of sustainability-related risks	<ul style="list-style-type: none"> <li>- Energy Management: Scenario Analysis Methodology</li> <li>- Labour Practices &amp; Standards: Scenario Analysis Methodology</li> <li>- Data Privacy and Cybersecurity: Scenario Analysis Methodology</li> </ul>	144
<b>44(a)(iii)</b>	How the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria)	<ul style="list-style-type: none"> <li>- Energy Management: Scenario Analysis Methodology</li> <li>- Labour Practices &amp; Standards: Scenario Analysis Methodology</li> <li>- Data Privacy and Cybersecurity: Scenario Analysis Methodology</li> </ul>	
<b>44(a)(iv)</b>	Whether and how the entity prioritises sustainability-related risks relative to other types of risk	<ul style="list-style-type: none"> <li>- Energy Management: Scenario Analysis Methodology</li> <li>- Labour Practices &amp; Standards: Scenario Analysis Methodology</li> <li>- Data Privacy and Cybersecurity: Scenario Analysis Methodology</li> </ul>	61
<b>44(a)(v)</b>	How the entity monitors sustainability-related risks	<ul style="list-style-type: none"> <li>- Energy Management: Scenario Analysis Methodology</li> <li>- Labour Practices &amp; Standards: Scenario Analysis Methodology</li> <li>- Data Privacy and Cybersecurity: Scenario Analysis Methodology</li> </ul>	89
			144

IFRS code	IFRS S1 Disclosure	Section	Page Reference
<b>S1</b>	<b>General Requirements for Disclosure of Sustainability-related Financial Information</b>		
<b>44(a)(vi)</b>	Whether and how the entity has changed the processes it uses compared with the previous reporting period	Not applicable. No processes have been changed compared with the previous reporting period.	
<b>44(b)</b>	The processes the entity uses to identify, assess, prioritise and monitor sustainability-related opportunities	<ul style="list-style-type: none"> <li>- Energy Management: Scenario Analysis Methodology</li> <li>- Labour Practices &amp; Standards: Scenario Analysis Methodology</li> <li>- Data Privacy and Cybersecurity: Scenario Analysis Methodology</li> </ul>	61
<b>44(c)</b>	The extent to which, and how, the processes for identifying, assessing, prioritising and monitoring sustainability-related risks and opportunities are integrated into and inform the entity's overall risk management process	<ul style="list-style-type: none"> <li>- Energy Management: Scenario Analysis Methodology</li> <li>- Labour Practices &amp; Standards: Scenario Analysis Methodology</li> <li>- Data Privacy and Cybersecurity: Scenario Analysis Methodology</li> </ul>	89 144
<b>Metrics and targets</b>			
<b>46(a)</b>	Metrics required by an applicable IFRS Sustainability Disclosure Standard	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	64 91 146
<b>46(b)</b>	Metrics the entity uses to measure and monitor:(i) that sustainability-related risk or opportunity; and (ii) its performance in relation to that sustainability-related risk or opportunity, including progress towards any targets the entity has set, and any targets it is required to meet by law or regulation	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	64 91 146
<b>48</b>	Metrics disclosed by an entity applying paragraphs 45–46 shall include metrics associated with particular business models, activities or other common features that characterise participation in an industry	SASB Content Index	209-211
<b>49</b>	If an entity discloses a metric taken from a source other than IFRS Sustainability Disclosure Standards, the entity shall identify the source and the metric taken	Other metrics disclosed in the report are with reference to the GRI Standards 2021. The metrics taken are listed in the GRI Content Index.	179-188
<b>50</b>	If a metric has been developed by an entity, the entity shall disclose information about:		
<b>50(a)</b>	How the metric is defined, including whether it is derived by adjusting a metric taken from a source other than IFRS Sustainability Disclosure Standards and, if so, which source and how the metric disclosed by the entity differs from the metric specified in that source	Not Applicable. Sunway did not develop its own metrics.	
<b>50(b)</b>	Whether the metric is an absolute measure, a measure expressed in relation to another metric or a qualitative measure (such as a red, amber, green – or RAG – status)	Not Applicable. Sunway did not develop its own metrics.	
<b>50(c)</b>	Whether the metric is validated by a third party and, if so, which party	Not Applicable. Sunway did not develop its own metrics.	
<b>50(d)</b>	The method used to calculate the metric and the inputs to the calculation, including the limitations of the method used and the significant assumptions made	Not Applicable. Sunway did not develop its own metrics.	

## IFRS S1 Content Index

IFRS code	IFRS S1 Disclosure	Section	Page Reference
<b>S1</b>	<b>General Requirements for Disclosure of Sustainability-related Financial Information</b>		
<b>51</b>	An entity shall disclose information about the targets it has set to monitor progress towards achieving its strategic goals, and any targets it is required to meet by law or regulation. For each target, the entity shall disclose:		
<b>51(a)</b>	The metric used to set the target and to monitor progress towards reaching the target	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	
<b>51(b)</b>	The specific quantitative or qualitative target the entity has set or is required to meet	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	
<b>51(c)</b>	The period over which the target applies	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	64
<b>51(d)</b>	The base period from which progress is measured	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	91 146
<b>51(e)</b>	Any milestones and interim targets	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	
<b>51(f)</b>	Performance against each target and an analysis of trends or changes in the entity's performance	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	
<b>51(g)</b>	Any revisions to the target and an explanation for those revisions	Not applicable. Sunway has not revised any targets.	
<b>52</b>	The definition and calculation of metrics, including metrics used to set the entity's targets and monitor progress towards reaching them, shall be consistent over time	Key Performance Indicators  Sunway has not redefined or replaced any metrics.	152-172
<b>53</b>	An entity shall label and define metrics and targets using meaningful, clear and precise names and descriptions	Key Performance Indicators	152-172
<b>Disclosure of information about sources of guidance</b>			
<b>59(a)</b>	An entity shall identify: the specific standards, pronouncements, industry practice and other sources of guidance that the entity has applied in preparing its sustainability-related financial disclosures, including, if applicable, identifying the disclosure topics in the SASB Standards	About This Report  SASB Content Index	1  209-211
<b>59(b)</b>	The industry(s) specified in the IFRS Sustainability Disclosure Standards, the SASB Standards or other sources of guidance relating to a particular industry(s) that the entity has applied in preparing its sustainability-related financial disclosures, including in identifying applicable metrics	SASB Content Index	209-211
<b>Location of disclosures</b>			
<b>60</b>	An entity is required to provide disclosures required by IFRS Sustainability Disclosure Standards as part of its general purpose financial reports	<ul style="list-style-type: none"> <li>- Energy Consumption</li> <li>- Labour Practices &amp; Standards: Metrics and Targets</li> <li>- Data Privacy and Cybersecurity: Metrics and Targets</li> </ul>	64 91 146

IFRS code	IFRS S1 Disclosure	Section	Page Reference
<b>S1</b>	<b>General Requirements for Disclosure of Sustainability-related Financial Information</b>		
<b>62</b>	An entity may disclose information required by an IFRS Sustainability Disclosure Standard in the same location as information disclosed to meet other requirements, such as information required by regulators. The entity shall ensure that the sustainability-related financial disclosures are clearly identifiable and not obscured by that additional information	Sustainability-related disclosures are provided in the Sustainability Report.	
<b>Timing of reporting</b>			
<b>64</b>	An entity shall report its sustainability-related financial disclosures at the same time as its related financial statements. The entity's sustainability-related financial disclosures shall cover the same reporting period as the related financial statements	About This Report	1
<b>66(a)</b>	When an entity changes the end of its reporting period and provides sustainability-related financial disclosures for a period longer or shorter than 12 months, it shall disclose: the period covered by the sustainability-related financial disclosures	Not applicable. Sunway's reporting period remains at 12 months.	
<b>66(b)</b>	The reason for using a longer or shorter period	Not applicable. Sunway's reporting period remains at 12 months.	
<b>66(c)</b>	The fact that the amounts disclosed in the sustainability-related financial disclosures are not entirely comparable	Not applicable. Sunway's reporting period remains at 12 months.	
<b>67</b>	If, after the end of the reporting period but before the date on which the sustainability-related financial disclosures are authorised for issue, an entity receives information about conditions that existed at the end of the reporting period, it shall update disclosures that relate to those conditions in the light of the new information	Not applicable. No outstanding information was received that requires updates or restatements to the disclosures. If such information were to come to light, Sunway will update its disclosures.	
<b>68</b>	An entity shall disclose information about transactions, other events and conditions that occur after the end of the reporting period, but before the date on which the sustainability-related financial disclosures are authorised for issue, if non-disclosure of that information could reasonably be expected to influence decisions that primary users of general purpose financial reports make on the basis of those reports	Not applicable. No outstanding information was received that requires updates or restatements to the disclosures. If such information were to come to light, Sunway will update its disclosures.	
<b>Comparative information</b>			
<b>70</b>	Unless another IFRS Sustainability Disclosure Standard permits or requires otherwise, an entity shall disclose comparative information in respect of the preceding period for all amounts disclosed in the reporting period. If such information would be useful for an understanding of the sustainability-related financial disclosures for the reporting period, the entity shall also disclose comparative information for narrative and descriptive sustainability-related financial information	Key Performance Indicators	152-172
<b>Statement of compliance</b>			
<b>72</b>	An entity whose sustainability-related financial disclosures comply with all the requirements of IFRS Sustainability Disclosure Standards shall make an explicit and unreserved statement of compliance. An entity shall not describe sustainability-related financial disclosures as complying with IFRS Sustainability Disclosure Standards unless they comply with all the requirements of IFRS Sustainability Disclosure Standards	About This Report	1
<b>Judgements</b>			
<b>74</b>	An entity shall disclose information to enable users of general purpose financial reports to understand the judgements, apart from those involving estimations of amounts (see paragraph 77), that the entity has made in the process of preparing its sustainability-related financial disclosures and that have the most significant effect on the information included in those disclosures	<ul style="list-style-type: none"> <li>- Energy Management</li> <li>- Labour Practices &amp; Standards</li> <li>- Data Privacy and Cybersecurity</li> </ul>	<p>61-64</p> <p>89-91</p> <p>144-146</p>

## IFRS S1 Content Index

IFRS code	IFRS S1 Disclosure	Section	Page Reference
<b>S1</b>	<b>General Requirements for Disclosure of Sustainability-related Financial Information</b>		
<b>Measurement uncertainty</b>			
<b>77</b>	An entity shall disclose information to enable users of general purpose financial reports to understand the most significant uncertainties affecting the amounts reported in its sustainability-related financial disclosures	Not applicable. Sunway has qualitatively disclosed changes to financial performance and cash flows.	
<b>78(a)</b>	An entity shall: identify the amounts that it has disclosed that are subject to a high level of measurement uncertainty		
<b>78(b)(i)</b>	In relation to each amount identified in paragraph 78(a), disclose information about: the sources of measurement uncertainty – for example, the dependence of the amount on the outcome of a future event, on a measurement technique or on the availability and quality of data from the entity's value chain		
<b>78(b)(ii)</b>	The assumptions, approximations and judgements the entity has made in measuring the amount		
<b>Errors</b>			
<b>83</b>	An entity shall correct material prior period errors by restating the comparative amounts for the prior period(s) disclosed unless it is impracticable to do so	Restatements	173
<b>Interaction with law or regulation</b>			
<b>B32</b>	An entity shall disclose material sustainability-related financial information, even if law or regulation permits the entity not to disclose such information	All material sustainability-related information is published publicly and readily accessible to users of general purpose financial reports.	
<b>B33</b>	An entity need not disclose information otherwise required by an IFRS Sustainability Disclosure Standard if law or regulation prohibits the entity from disclosing that information. If an entity omits material information for that reason, it shall identify the type of information not disclosed and explain the source of the restriction	Not applicable	
<b>Commercially sensitive information</b>			
<b>B36(a)</b>	If an entity elects to use the exemption specified the entity shall, for each item of information omitted: disclose the fact that it has used the exemption	Not applicable	
<b>B36(b)</b>	Reassess, at each reporting date, whether the information qualifies for the exemption	Not applicable	
<b>Connected information</b>			
<b>B42(a)</b>	Drawing connections between disclosures involves, but is not limited to, providing necessary explanations and cross-references and using consistent data, assumptions, and units of measure. In providing connected information, an entity shall: explain connections between disclosures in a clear and concise manner	Sunway has made cross-references to avoid duplication where necessary.	
<b>B42(b)</b>	Avoid unnecessary duplication if IFRS Sustainability Disclosure Standards require the disclosure of common items of information	Sunway has made cross-references to avoid duplication where necessary.	
<b>B42(c)</b>	Disclose information about significant differences between the data and assumptions used in preparing the entity's sustainability-related financial disclosures and the data and assumptions used in preparing the related financial statements	Not applicable	
<b>Information included by cross-reference</b>			
<b>B47(a)</b>	If information required by an IFRS Sustainability Disclosure Standard is included by cross-reference: the sustainability-related financial disclosures shall clearly identify the report within which that information is located and explain how to access that report	Sunway has made cross-references to specific documents and the sections relevant to the content.	
<b>B47(b)</b>	The cross-reference shall be to a precisely specified part of that report	Sunway has made cross-references to specific documents and the sections relevant to the content.	

IFRS code	IFRS S1 Disclosure	Section	Page Reference
S1	General Requirements for Disclosure of Sustainability-related Financial Information		
<b>Comparative information (Metrics)</b>			
<b>B50(a)</b>	In some cases, the amount disclosed for a metric is an estimate. Except as specified if an entity identifies new information in relation to the estimated amount disclosed in the preceding period and the new information provides evidence of circumstances that existed in that period, the entity shall: disclose a revised comparative amount that reflects that new information	Key Performance Indicators Restatements	152-172 173
<b>B50(b)</b>	Disclose the difference between the amount disclosed in the preceding period and the revised comparative amount	Not applicable. There were no restatements for metrics related to Labour Practices & Standards, Energy Management, and Data Privacy & Cybersecurity during the reporting period.	
<b>B50(c)</b>	Explain the reasons for revising the comparative amount		
<b>B52(a)</b>	If an entity redefines or replaces a metric in the reporting period, the entity shall: disclose a revised comparative amount, unless it is impracticable to do so		
<b>B52(b)</b>	Explain the changes	Not applicable. There were no redefinitions or replacements for metrics related to Labour Practices & Standards, Energy Management, and Data Privacy & Cybersecurity during the reporting period.	
<b>B52(c)</b>	Explain the reasons for those changes, including why the redefined or replacement metric provides more useful information		
<b>B53</b>	If an entity introduces a new metric in the reporting period, it shall disclose a comparative amount for that metric unless it is impracticable to do so		
<b>B54</b>	Sometimes, it is impracticable to revise a comparative amount to achieve comparability with the reporting period. For example, data might not have been collected in the preceding period in a way that allows retrospective application of a new definition of a metric, and it might be impracticable to recreate the data. If it is impracticable to revise a comparative amount for the preceding period, an entity shall disclose that fact	Not applicable. There were no restatements for metrics related to Labour Practices & Standards, Energy Management, and Data Privacy & Cybersecurity during the reporting period.	
<b>Errors</b>			
<b>B58(a)</b>	If an entity identifies a material error in its prior period(s) sustainability-related financial disclosures, it shall disclose: the nature of the prior period error	Not applicable. There were no restatements for metrics related to Labour Practices & Standards, Energy Management, and Data Privacy & Cybersecurity during the reporting period.	
<b>B58(b)</b>	The correction, to the extent practicable, for each prior period disclosed		
<b>B58(c)</b>	If correction of the error is impracticable, the circumstances that led to the existence of that condition and a description of how and from when the error has been corrected		
<b>B59</b>	When it is impracticable to determine the effect of an error on all prior periods presented, the entity shall restate the comparative information to correct the error from the earliest date practicable		

**IFRS S2 Content Index**

IFRS code	IFRS S2 Disclosure	Section	Page Reference
<b>S2</b>	<b>Climate-related Disclosures</b>		
<b>Governance</b>			
<b>6(a)(i)</b>	The governance body(s) (which can include a board, committee or equivalent body charged with governance) or individual(s) responsible for oversight of climate-related risks and opportunities. Specifically, the entity shall identify that body(s) or individual(s) and disclose information about:(i) how responsibilities for climate-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s)	Board Sustainability Committee	18
<b>6(a)(ii)</b>	How the body(s) or individual(s) determines whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to climate-related risks and opportunities		
<b>6(a)(iii)</b>	How and how often the body(s) or individual(s) is informed about climate-related risks and opportunities		
<b>6(a)(iv)</b>	How the body(s) or individual(s) takes into account climate-related risks and opportunities when overseeing the entity’s strategy, its decisions on major transactions and its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities		
<b>6(a)(v)</b>	How the body(s) or individual(s) oversees the setting of targets related to climate-related risks and opportunities, and monitors progress towards those targets (see paragraphs 33–36), including whether and how related performance metrics are included in remuneration policies (see paragraph 29(g))	- Sustainability-Linked KPIs - Board Sustainability Committee	13-15 18
<b>6(b)(i)</b>	Management’s role in the governance processes, controls and procedures used to monitor, manage and oversee climate-related risks and opportunities, including information about:(i) whether the role is delegated to a specific management-level position or management-level committee and how oversight is exercised over that position or committee	Board Sustainability Committee	18
<b>6(b)(ii)</b>	Whether management uses controls and procedures to support the oversight of climate-related risks and opportunities and, if so, how these controls and procedures are integrated with other internal functions	Board Sustainability Committee	18
<b>7</b>	In preparing disclosures to fulfil the requirements in paragraph 6, an entity shall avoid unnecessary duplication in accordance with IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information (IFRS S1)	Sunway has made cross-references to avoid duplication where necessary.	
<b>Strategy</b>			
<b>9(a)</b>	The climate-related risks and opportunities that could reasonably be expected to affect the entity’s prospects (see paragraphs 10–12)	- Sea Level Rise Risk - Direct Rainfall Damage Risk	40-45
<b>9(b)</b>	The current and anticipated effects of those climate-related risks and opportunities on the entity’s business model and value chain (see paragraph 13)	- Riverine/Rainfall-Driven Flooding Risk - Policy And Legal Risk - Reputation Risk	
<b>9(c)</b>	The effects of those climate-related risks and opportunities on the entity’s strategy and decision-making, including information about its climate-related transition plan (see paragraph 14)		
<b>9(d)</b>	The effects of those climate-related risks and opportunities on the entity’s financial position, financial performance and cash flows for the reporting period, and their anticipated effects on the entity’s financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how those climate-related risks and opportunities have been factored into the entity’s financial planning (see paragraphs 15–21)		

IFRS code	IFRS S2 Disclosure	Section	Page Reference
<b>S2</b>	<b>Climate-related Disclosures</b>		
<b>9(e)</b>	The climate resilience of the entity's strategy and its business model to climate-related changes, developments and uncertainties, taking into consideration the entity's identified climate-related risks and opportunities (see paragraph 22)	Climate Resilience	48
<b>Climate-related risks and opportunities</b>			
<b>10(a)</b>	Describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects	- Sea Level Rise Risk - Direct Rainfall Damage Risk	40-45
<b>10(b)</b>	Explain, for each climate-related risk the entity has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk	- Riverine/Rainfall-Driven Flooding Risk - Policy And Legal Risk - Reputation Risk	
<b>10(c)</b>	Specify, for each climate-related risk and opportunity the entity has identified, over which time horizons – short, medium or long term – the effects of each climate-related risk and opportunity could reasonably be expected to occur		
<b>10(d)</b>	Explain how the entity defines 'short term', 'medium term' and 'long term' and how these definitions are linked to the planning horizons used by the entity for strategic decision-making	Time Horizons	35
<b>12</b>	In identifying the climate-related risks and opportunities that could reasonably be expected to affect an entity's prospects, the entity shall refer to and consider the applicability of the industry-based disclosure topics defined in the Industry-based Guidance on Implementing IFRS S2	SASB Content Index	209-211
<b>Business model and value chain</b>			
<b>13(a)</b>	A description of the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain	- Sea Level Rise Risk - Direct Rainfall Damage Risk - Riverine/Rainfall-Driven Flooding Risk - Policy And Legal Risk - Reputation Risk	40-45
<b>13(b)</b>	A description of where in the entity's business model and value chain climate-related risks and opportunities are concentrated (for example, geographical areas, facilities and types of assets)		
<b>Strategy and decision-making</b>			
<b>14(a)(i)</b>	Information about how the entity has responded to, and plans to respond to, climate-related risks and opportunities in its strategy and decision-making, including how the entity plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation. Specifically, the entity shall disclose information about:(i) current and anticipated changes to the entity's business model, including its resource allocation, to address climate-related risks and opportunities (for example, these changes could include plans to manage or decommission carbon-, energy- or water-intensive operations; resource allocations resulting from demand or supply-chain changes; resource allocations arising from business development through capital expenditure or additional expenditure on research and development; and acquisitions or divestments)	- Sea Level Rise Risk - Direct Rainfall Damage Risk - Riverine/Rainfall-Driven Flooding Risk - Policy And Legal Risk - Reputation Risk	40-45
<b>14(a)(ii)</b>	Current and anticipated direct mitigation and adaptation efforts (for example, through changes in production processes or equipment, relocation of facilities, workforce adjustments, and changes in product specifications)		
<b>14(a)(iii)</b>	Current and anticipated indirect mitigation and adaptation efforts (for example, through working with customers and supply chains)		

IFRS S2 Content Index

IFRS code	IFRS S2 Disclosure	Section	Page Reference
<b>S2</b>	<b>Climate-related Disclosures</b>		
<b>14(a)(iv)</b>	Any climate-related transition plan the entity has, including information about key assumptions used in developing its transition plan, and dependencies on which the entity's transition plan relies	Sunway's Net Zero Carbon Emissions by 2050 Roadmap	46-47
<b>14(a)(v)</b>	How the entity plans to achieve any climate-related targets, including any greenhouse gas emissions targets, described in accordance with paragraphs 33-36		
<b>14(b)</b>	Information about how the entity is resourcing, and plans to resource, the activities disclosed in accordance with paragraph 14(a)	Climate Report	36-45
<b>14(c)</b>	Quantitative and qualitative information about the progress of plans disclosed in previous reporting periods in accordance with paragraph 14(a)	Sunway's Net Zero Carbon Emissions by 2050 Roadmap	46-47
<b>Financial position, financial performance and cash flows</b>			
<b>15(a)</b>	The effects of climate-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period (current financial effects)	- Sea Level Rise Risk - Direct Rainfall Damage Risk	40-45
<b>15(b)</b>	The anticipated effects of climate-related risks and opportunities on the entity's financial position, financial performance and cash flows over the short, medium and long term, taking into consideration how climate-related risks and opportunities are included in the entity's financial planning (anticipated financial effects)	- Riverine/Rainfall-Driven Flooding Risk - Policy And Legal Risk - Reputation Risk	
<b>16(a)</b>	How climate-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period		
<b>16(b)</b>	The climate-related risks and opportunities identified in paragraph 16(a) for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements	Not applicable. There are no significant risks of material adjustments to Sunway's related financial statements.	
<b>16(c)</b>	How the entity expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities, taking into consideration:(i) its investment and disposal plans (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements), including plans the entity is not contractually committed to; and (ii) its planned sources of funding to implement its strategy	- Sea Level Rise Risk - Direct Rainfall Damage Risk - Riverine/Rainfall-Driven Flooding Risk - Policy And Legal Risk - Reputation Risk	40-45
<b>16(d)</b>	How the entity expects its financial performance and cash flows to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities (for example, increased revenue from products and services aligned with a lower-carbon economy; costs arising from physical damage to assets from climate events; and expenses associated with climate adaptation or mitigation)	Physical Risk: Findings of the Scenario Analysis	39

IFRS code	IFRS S2 Disclosure	Section	Page Reference
<b>S2</b>	<b>Climate-related Disclosures</b>		
<b>21(a)</b>	If an entity determines that it need not provide quantitative information about the current or anticipated financial effects of a climate-related risk or opportunity applying the criteria set out in paragraphs 19–20, the entity shall: (a) explain why it has not provided quantitative information	Sunway has provided quantitative information on the financial effects of climate-related risks and opportunities.	
<b>21(b)</b>	(b) Provide qualitative information about those financial effects, including identifying line items, totals and subtotals within the related financial statements that are likely to be affected, or have been affected, by that climate-related risk or opportunity	Not applicable. Sunway has provided quantitative information.	
<b>21(c)</b>	(c) Provide quantitative information about the combined financial effects of that climate-related risk or opportunity with other climate-related risks or opportunities and other factors unless the entity determines that quantitative information about the combined financial effects would not be useful	Not applicable. Sunway has provided quantitative information.	
<b>Climate resilience</b>			
<b>22(a)(i)</b>	The implications, if any, of the entity's assessment for its strategy and business model, including how the entity would need to respond to the effects identified in the climate-related scenario analysis	Climate Resilience	48
<b>22(a)(ii)</b>	The significant areas of uncertainty considered in the entity's assessment of its climate resilience		
<b>22(a)(iii)</b>	The entity's capacity to adjust or adapt its strategy and business model to climate change over the short, medium and long term		
<b>22(b)</b>	How and when the climate-related scenario analysis was carried out	- Physical Risk: Scenario Analysis - Transition Risk: Scenario Analysis	38 43
<b>22(b)(i)</b>	Information about the inputs the entity used, including: (1) which climate-related scenarios the entity used for the analysis and the sources of those scenarios; (2) whether the analysis included a diverse range of climate-related scenarios; (3) whether the climate-related scenarios used for the analysis are associated with climate-related transition risks or climate-related physical risks; (4) whether the entity used, among its scenarios, a climate-related scenario aligned with the latest international agreement on climate change; (5) why the entity decided that its chosen climate-related scenarios are relevant to assessing its resilience to climate-related changes, developments or uncertainties; (6) the time horizons the entity used in the analysis; and (7) what scope of operations the entity used in the analysis (for example, the operating locations and business units used in the analysis)	- Physical Risk: Scenario Analysis - Transition Risk: Scenario Analysis	38 43
<b>22(b)(ii)</b>	The key assumptions the entity made in the analysis, including assumptions about: (1) climate-related policies in the jurisdictions in which the entity operates; (2) macroeconomic trends; (3) national- or regional-level variables (for example, local weather patterns, demographics, land use, infrastructure and availability of natural resources); (4) energy usage and mix; and (5) developments in technology		
<b>22(b)(iii)</b>	The reporting period in which the climate-related scenario analysis was carried out		
<b>23</b>	In preparing disclosures to meet the requirements in paragraphs 13–22, an entity shall refer to and consider the applicability of cross-industry metric categories, as described in paragraph 29, and industry-based metrics associated with disclosure topics defined in the Industry-based Guidance on Implementing IFRS S2 as described in paragraph 32	SASB Content Index	209-211

## IFRS S2 Content Index

IFRS code	IFRS S2 Disclosure	Section	Page Reference
<b>S2</b>	<b>Climate-related Disclosures</b>		
<b>Risk management</b>			
<b>25(a)</b>	The processes and related policies the entity uses to identify, assess, prioritise and monitor climate-related risks, including information about		
<b>25(a)(i)</b>	The inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes)	- Physical Risk: Scenario Analysis - Transition Risk: Scenario Analysis	38 43
<b>25(a)(ii)</b>	Whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related risks		
<b>25(a)(iii)</b>	How the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria)	- Value-at-Risk (VaR) - Physical Risk: Scenario Analysis - Transition Risk: Scenario Analysis	37 38 43
<b>25(a)(iv)</b>	Whether and how the entity prioritises climate-related risks relative to other types of risk	Our CRO Methodology	37
<b>25(a)(v)</b>	How the entity monitors climate-related risks		
<b>25(a)(vi)</b>	Whether and how the entity has changed the processes it uses compared with the previous reporting period	Not applicable. Sunway has not changed its processes.	
<b>25(b)</b>	The processes the entity uses to identify, assess, prioritise and monitor climate-related opportunities, including information about whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related opportunities	- Physical Risk: Scenario Analysis - Transition Risk: Scenario Analysis"	38 43
<b>25(c)</b>	The extent to which, and how, the processes for identifying, assessing, prioritising and monitoring climate-related risks and opportunities are integrated into and inform the entity's overall risk management process		
<b>26</b>	In preparing disclosures to fulfil the requirements in paragraph 25, an entity shall avoid unnecessary duplication in accordance with IFRS S1	Sunway has made cross-references to avoid duplication where necessary.	

IFRS code	IFRS S2 Disclosure	Section	Page Reference
S2	Climate-related Disclosures		
<b>Metrics and targets</b>			
<b>Climate-related metrics</b>			
29(a)(i)	Disclose its absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tonnes of CO2 equivalent, classified as: (1) Scope 1 greenhouse gas emissions; (2) Scope 2 greenhouse gas emissions; and (3) Scope 3 greenhouse gas emissions	Net Zero Roadmap: Our Performance	50-54
29(a)(ii)	Measure its greenhouse gas emissions in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004) unless required by a jurisdictional authority or an exchange on which the entity is listed to use a different method for measuring its greenhouse gas emissions. When an entity discloses its greenhouse gas emissions measured in accordance with another method, applying paragraphs 29(a)(ii), the entity shall disclose: (a) the applicable method and measurement approach the entity uses to determine its greenhouse gas emissions; and (b) the reason, or reasons, for the entity's choice of method and measurement approach and how that approach relates to the disclosure objective in paragraph 27	Emissions Calculation Methodology	49
29(a)(iii)	Disclose the approach it uses to measure its greenhouse gas emissions including: (1) the measurement approach, inputs and assumptions the entity uses to measure its greenhouse gas emissions; (2) the reason why the entity has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions; and (3) any changes the entity made to the measurement approach, inputs and assumptions during the reporting period and the reasons for those changes		

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IFRS code	IFRS S2 Disclosure	Section	Page Reference
<b>S2</b>	<b>Climate-related Disclosures</b>		
<b>29(a)(iv)</b>	For Scope 1 and Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i) (1)–(2), disaggregate emissions between: (1) the consolidated accounting group (for example, for an entity applying IFRS Accounting Standards, this group would comprise the parent and its consolidated subsidiaries); and (2) other investees excluded from paragraph 29(a)(iv)(1) (for example, for an entity applying IFRS Accounting Standards, these investees would include associates, joint ventures and unconsolidated subsidiaries)	Emissions Calculation Methodology	49
<b>29(a)(v)</b>	For Scope 2 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(2), disclose its location-based Scope 2 greenhouse gas emissions, and provide information about any contractual instruments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse gas emissions	Emissions Calculation Methodology	
<b>29(a)(vi)</b>	For Scope 3 greenhouse gas emissions disclosed in accordance with paragraph 29(a)(i)(3), disclose: (1) the categories included within the entity's measure of Scope 3 greenhouse gas emissions, in accordance with the Scope 3 categories described in the Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (2011); and (2) additional information about the entity's Category 15 greenhouse gas emissions or those associated with its investments (financed emissions), if the entity's activities include asset management, commercial banking or insurance		
<b>29(b)</b>	Climate-related transition risks – the amount and percentage of assets or business activities vulnerable to climate-related transition risks	Findings of the Scenario Analysis	39
<b>29(c)</b>	Climate-related physical risks – the amount and percentage of assets or business activities vulnerable to climate-related physical risks		
<b>29(d)</b>	Climate-related opportunities – the amount and percentage of assets or business activities aligned with climate-related opportunities		
<b>29(e)</b>	Capital deployment – the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities		
<b>29(f)(i)</b>	Internal carbon prices – the entity shall disclose: an explanation of whether and how the entity is applying a carbon price in decision-making (for example, investment decisions, transfer pricing and scenario analysis)	Climate Report: Sustaining Our Climate Journey Backed By Global Standards	36
<b>29(f)(ii)</b>	The price for each metric tonne of greenhouse gas emissions the entity uses to assess the costs of its greenhouse gas emissions		
<b>29(g)(i)</b>	Remuneration – the entity shall disclose: a description of whether and how climate-related considerations are factored into executive remuneration	- Sustainability Strategy - Sustainability-Linked KPIs	12-15
<b>29(g)(ii)</b>	The percentage of executive management remuneration recognised in the current period that is linked to climate-related considerations	Not disclosed due to confidentiality constraints.	

IFRS code	IFRS S2 Disclosure	Section	Page Reference
S2	Climate-related Disclosures		
<b>Climate-related targets</b>			
32	An entity shall disclose industry-based metrics that are associated with one or more particular business models, activities or other common features that characterise participation in an industry. In determining the industry-based metrics that the entity discloses, the entity shall refer to and consider the applicability of the industry-based metrics associated with disclosure topics described in the Industry-based Guidance on Implementing IFRS S2	SASB Content Index	209-211
33	An entity shall disclose the quantitative and qualitative climate-related targets it has set to monitor progress towards achieving its strategic goals, and any targets it is required to meet by law or regulation, including any greenhouse gas emissions targets. For each target, the entity shall disclose	Emissions Reduction Targets	48
33(a)	The metric used to set the target		
33(b)	The objective of the target (for example, mitigation, adaptation or conformance with science-based initiatives)		
33(c)	The part of the entity to which the target applies (for example, whether the target applies to the entity in its entirety or only a part of the entity, such as a specific business unit or specific geographical region)		
33(d)	The period over which the target applies		
33(e)	The base period from which progress is measured		
33(f)	Any milestones and interim targets		
33(g)	If the target is quantitative, whether it is an absolute target or an intensity target	Emissions Reduction Targets	48
33(h)	How the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target		
34	An entity shall disclose information about its approach to setting and reviewing each target, and how it monitors progress against each target, including	Net Zero Roadmap: Our Performance	50-54
34(a)	Whether the target and the methodology for setting the target has been validated by a third party	Assurance Statements	212-216
34(b)	The entity's processes for reviewing the target	Climate Report: Target-Setting Methodology	46
34(c)	The metrics used to monitor progress towards reaching the target	Emissions Reduction Targets	48
34(d)	Any revisions to the target and an explanation for those revisions	Not applicable. Sunway has not revised any climate-related targets.	
35	An entity shall disclose information about its performance against each climate-related target and an analysis of trends or changes in the entity's performance	Emissions Reduction Targets	48
36(a)	Which greenhouse gases are covered by the target		
36(b)	Whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target		
36(c)	Whether the target is a gross greenhouse gas emissions target or net greenhouse gas emissions target. If the entity discloses a net greenhouse gas emissions target, the entity is also required to separately disclose its associated gross greenhouse gas emissions target		

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IFRS code	IFRS S2 Disclosure	Section	Page Reference
<b>S2</b>	<b>Climate-related Disclosures</b>		
<b>36(d)</b>	Whether the target was derived using a sectoral decarbonisation approach	Sunway's targets are not derived from using a sectoral decarbonisation approach.	
<b>36(e)</b>	The entity's planned use of carbon credits to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target. In explaining its planned use of carbon credits the entity shall disclose information including, and with reference to	Net Zero Roadmap: Our Performance	51
<b>36(e)(i)</b>	The extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits		
<b>36(e)(ii)</b>	Which third-party scheme(s) will verify or certify the carbon credits		
<b>36(e)(iii)</b>	The type of carbon credit, including whether the underlying offset will be nature-based or based on technological carbon removals, and whether the underlying offset is achieved through carbon reduction or removal		
<b>36(e)(iv)</b>	Any other factors necessary for users of general purpose financial reports to understand the credibility and integrity of the carbon credits the entity plans to use (for example, assumptions regarding the permanence of the carbon offset)		
<b>B56(a)</b>	As part of the requirement in paragraph 29(a)(iii), and to reflect how an entity prioritises Scope 3 data in accordance with the measurement framework set out in the entity shall disclose information that enables users of general purpose financial reports to understand: the extent to which the entity's Scope 3 greenhouse gas emissions are measured using inputs from specific activities within the entity's value chain	Emissions Calculation Methodology	176-178
<b>B56(b)</b>	The extent to which the entity's Scope 3 greenhouse gas emissions are measured using inputs that are verified		

# **SUNWAY**

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