



**WENTEL ENGINEERING HOLDINGS BERHAD**  
and its subsidiaries  
[The “Group”]


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**M025**  
**SUSTAINABILITY POLICY**

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## 1. INTRODUCTION

At Wentel Engineering Holdings Berhad (“Company”) and its subsidiary(ies) (“Group”), sustainability is increasingly becoming a key strategic factor in our decision-making as we aim to balance profitability, environmental protection, and the growth and prosperity of the communities in which we operate. Therefore, we have established the Sustainability Policy (“Policy”), which states our commitments and serves as our guide in delivering sustainable growth and development. The Policy shapes our actions and how we conduct our business and operations and delivers sustainability to our value chain. We expect all stakeholders (i.e., directors, employees, our entire supply chain, joint ventures, and community partners) to embrace the Policy.

We ensured this Policy aligns with the Group’s existing governance policies such as the Code of Ethics, Anti-Bribery and Anti-Corruption (“ABAC”) Policy, Whistleblowing Policy, and other pertinent laws and regulations. Copies of the Policy and the above-mentioned policies can be accessed via our website (<https://www.wenteleng.com/policies>) and are disseminated to all our stakeholders.

## 2. OBJECTIVES


- 2.1. Endeavour to integrate sustainability considerations into the day-to-day operations of the Group and ensure the effective implementation of the Group’s sustainability strategies and plans;
- 2.2. Ensure that the Board of Directors of the Company (“Board”) and key senior management of the Company proactively consider sustainability issues when they oversee the planning, performance and long-term strategy of the Group;
- 2.3. Ensure the Group remains resilient and is able to deliver durable and sustainable value while maintaining the confidence of its stakeholders; and
- 2.4. Create a culture of sustainability within the Group, and the community, with an emphasis on the integration of environmental, social and governance considerations into decision-making and the delivery of outcomes.

## 3. SUSTAINABILITY COMMITMENTS

### GOVERNANCE

As sustainability factors gain more prominence, companies are increasingly focusing on transparency, accountability, diversity, inclusion, environmental and social issues, and the sustainability and resilience of supply chains. In response, our group adopts a leadership perspective that encompasses local and global considerations.

Our commitment to Economic, Environmental, Social, and Governance sustainability is evident in our corporate governance framework, which adheres to the Malaysian Code on

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Corporate Governance 2021 and Bursa Reporting Framework, as well as international standards. Upholding these crucial sustainability principles are our Board and Key Management Team, who play a pivotal role in making strategic plans and decisions that uphold our sustainability commitments, instilling confidence in our stakeholders about our leadership's dedication to sustainability.

### **ETHICS, INTEGRITY, and ACCOUNTABILITY**

Our Group conducts all business transactions uncompromisingly and abides by laws and regulations pertinent to our operational and business frameworks. This applies to every individual and entity in the Group. All directors, executives, managers, employees, and business and community partners must exhibit only the highest standards of business ethics.

- Meet regulatory compliance with all Environmental, Health & Safety, Human Rights, and Labour laws and regulations.
- Abide by the prescribed international standards and guidelines for our operations.
- Allocate tools and resources for monitoring our stakeholders' compliance with our Policies and pertinent laws and regulations.
- Practice honesty and transparency in conducting business and decision-making.


*Please refer to M014 Section 4 for the Sustainability Governance Structure*

### **ENVIRONMENT**

As the severity of the climate crisis intensifies, conversations around corporate sustainability are shifting as firms come under greater scrutiny to showcase their green credentials. In tandem with these emerging issues, the Group recognises that we must play a role in environmental protection to address the impacts of our operational actions. As such, we consistently strive to meet statutory and regulatory standards and stakeholder expectations. We push forward to ensure that operational efficiency is achieved in an environmentally conscious manner.

To this end, we have established the following environmental commitments:

- Comply with all applicable environmental statutes, laws and regulations.
- Eliminate the use of virgin materials, strive to reduce or avoid waste generation, and practice the 4Rs (Reduce, Reuse, Recycle and Recover).
- Consume raw materials and energy sources as efficiently as possible; reduce Greenhouse Gas emissions by using viable renewable energy sources; and purchase energy-efficient equipment and machinery.
- Minimise air pollution by installing control systems and monitoring air quality and emissions.
- Conserve water by reusing recycled water and implementing water harvesting.
- Inculcate good environmental values in our stakeholders through education, raising awareness, training and communication.
- Set environmental targets relevant to the Group's business and operations

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**HEALTH AND SAFETY**

Mitigating the health and safety risks of our stakeholders and employees on and off the job is our top priority. We actively promote a culture that values the health and well-being of our people, and it is integrated with our company-wide rollout of health and safety procedures that empower our organisations to identify and mitigate risks to improve safety performance. We adhere to the Occupational Safety and Health Act 1994 and all other pertinent statutory and regulatory health & safety rules.

The Group Health and Safety commitment to our stakeholders are:

- Comply with all Health & Safety (H&S) regulations.
- Provide safe and healthy working conditions in the workplace to prevent work-related injury and illness.
- Conduct operational H&S risk assessments to prevent unwanted incidents and carry out thorough investigations if an incident occurs.
- Cultivate H&S values in our stakeholders through education, raising awareness, training and communication.
- Equip the workforce with Personal Protection Equipment relevant to their roles and functions.
- Make considerable effort to avoid or reduce the likelihood of adverse H&S impacts on our stakeholders and surrounding communities.
- Set H&S targets and monitor our performance and progress.

**HUMAN RIGHTS AND SOCIETY**

Human Rights Policy

Our Human Rights Policy is consistent with the UN Guiding Principles on Business and Human Rights (Guiding Principles). The rules and protocols below must be followed by all our stakeholders (i.e. community and business partners, customers, employees, suppliers, vendors, contractors and any part of our supply chain) in dealing with the human rights aspect of our business and operations. The Group and stakeholders are expected to abide by this Policy and invoke zero tolerance for human rights violations.


The following lists our Group commitments in upholding human rights:

**(i) Modern Slavery and Human Trafficking**

Modern slavery, forced labour, and human trafficking are gross violations of human rights. These unfair labour practices can take various forms but have one thing in common — the exploitation of one person by another through the deprivation of liberty for personal or commercial gain.

To prevent these injustices, we have adopted the following measures:

- Uphold ethical and humanitarian employment standards in the recruitment of foreign workers and provide fair contractual arrangements.
- Conduct audits and spot checks or other similar processes.
- Review our supply chain and identify risk areas where slavery and human trafficking may potentially occur.

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- Rule out all incidents of corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse.
- Ensure that any housing or accommodation provided to employees adheres to the prescribed regulatory, health, and safety standards.
- Employees will not be compelled to work against their will, including intimidation, threat, or physical confinement.
- Reject the purchase and use of conflict minerals or their derivatives, which may directly or indirectly finance human violations or benefit unlawful activities.

### **(ii) Diversity and Inclusivity**

The Group aspires to foster an inclusive culture where employees feel motivated and valued. We strive to create a working environment where our diverse workforce collaborates and harnesses their skills. Below are the guidelines in place to ensure that equality and fairness are advanced in all our operations:


- Respect all employees regardless of race, gender, age, nationality, religious beliefs, disability and ethnicity.
- Treat all co-workers fairly and condemn any form of discrimination, bullying and harassment rooted in differences of background or thought.
- Enforce an unbiased system of recruitment, selection, training and promotion.
- Offer fair and equal remuneration and opportunities for career development, talent management, mentoring and succession planning.

### **(iii) Labour Standards**

Our Group abides by all applicable labour laws and regulations. This allows the Group and our suppliers to consciously apply social justice and provide decent work while attaining mutual economic growth.

The Group labour standards follow the national and international practices enumerated as below:

- **Child Labour:** We adhere to Malaysia's Children and Young Persons (Employment) Act 1966. We do not tolerate any form of child labour practices in our supply chain and our business operations.
- **Freedom of Association & Collective Bargaining:** We subscribe to the established Malaysian labour laws, which champion employees' rights to freedom of association and collective bargaining.
- **Disciplinary & Grievance Practices:** We treat all employees with dignity and respect. We do not tolerate any acts of corporal punishment, mental or physical coercion or verbal abuse towards employees.
- **Working Hours:** We follow the government's prescribed national laws and regulations on the minimum number of working hours (including overtime and rest periods) and holiday entitlements.
- **Remuneration and benefits:** All work-related remuneration and benefits are based on merit and performance as determined by performance reviews.

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### **COMMUNITY COMMITMENTS**

We acknowledge that one of our responsibilities is to enrich our surrounding communities. As community partners, we uphold the fundamental human rights of every individual living in the communities where we operate. We seek to build meaningful long-term relationships that produce mutual and lasting benefits through the following:

- Prioritise local sourcing and hiring.
- Foster good community relationships by maintaining open communication.
- Motivate employees to participate in local events or volunteer activities and conduct or join community initiatives and projects.

### **PROCUREMENT PRACTICES**

We will continue to improve our supply chain, deliver greater value, and enable continued mutual growth.

The supplier is responsible for ensuring that its facilities are designed and safely operated in compliance with the established government and industry environmental protection policies and that they do not present unnecessary risks to the environment or the public. Our Group suppliers shall maintain safe, sanitary, and healthy living environments and accommodations for all employees.

All our suppliers are held to our principles of integrity and transparency as set out in our Code of Conduct and Policy. Direct suppliers must undergo periodic sustainability compliance audits to verify compliance with this Policy and the relevant laws and regulations. We reserve the right to inspect any site involved in business activities with the Group. All assessments of non-compliance will be conducted in good faith.


Lastly, our suppliers of goods and services have a legal duty to adhere to country-appropriate laws and regulations.

## **4. REPORTING PROCESS**

For procedures, concerns and handling of reporting in violation of this Policy, please refer to our Whistleblowing Policy at <https://www.wenteleng.com/whistle-blowing-policy>

## **5. DISCLOSURES**

The reporting and disclosures about the sustainability position of the Group will be included in the sustainability statement of our Company's Annual Report and disclosed on the Company website.

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## 6. REVIEW AND MONITORING OF THIS POLICY

### Monitoring and Periodic Review of Policy

The Group will monitor these procedures to ensure it remains consistent with the Group's objectives and responsibilities. This Policy will be reviewed annually by the Board to assess its adequacy and effectiveness

### Board Approval

This policy (Version No. 2) was reviewed and approved by the Board of the Company on 20<sup>th</sup> November 2024.