

SUSTAINABILITY STATEMENT

Creating Future-Ready Projects for the Next Generations

With more than four decades of experience, NCT Alliance and its subsidiaries (“NCT Alliance Group” or “the Group”) continue to apply their property development expertise to deliver projects that balance economic value creation with environmental stewardship and social responsibility.

This 2025 sustainability statement provides an overview of the Group’s environmental, social and governance (“ESG”) performance, sustainability priorities and management approach. The disclosures are prepared in accordance with Bursa Malaysia’s enhanced sustainability reporting requirements and are intended to support stakeholders’ understanding of how sustainability considerations are integrated into the Group’s strategy, governance and operations.

This year, the Group undertook a materiality reassessment to identify and reassess ESG-related risks and opportunities relevant to the property development sector. The outcomes of this assessment were incorporated into strategic planning and operational decision-making, strengthening the alignment between sustainability priorities and business objectives.

In strengthening its climate and environmental management practices, the Group expanded its greenhouse gas (“GHG”) emissions tracking to include Scope 3 emissions across selected categories within its value chain. These include, where data is available and relevant, emissions associated with purchased goods and services, fuel- and energy-related activities, waste generated in operations and business travel. This represents a progressive step towards improving the completeness and transparency of the Group’s emissions profile.

To reinforce responsible governance practices, the Group introduced a Conflict-of-Interest Policy and ensured compliance with the Code of Ethics for Company Directors and Company Secretaries, reflecting its continued commitment to accountability, transparency and sound corporate governance in supporting long-term sustainable value creation.

Setting Our Reporting Perimeters

This Sustainability Statement covers the sustainability-related disclosures of the Group for the financial year from 1 January 2025 to 31 December 2025 (FYE 2025). The reporting boundary encompasses the Group’s corporate headquarters operations and property development activities where the Group has direct management control during the reporting period.

The Statement focuses on material economic, environmental, social and governance matters arising from the Group’s operations in Malaysia. Where relevant and available, comparative information from prior financial years has been included to provide context, enable trend analysis and support the monitoring of the Group’s sustainability performance and progress.

Keeping Accountability with Guiding Frameworks

NCT Alliance prepares its sustainability disclosures with reference to Bursa Malaysia’s Sustainability Reporting Guide (3rd Edition) to ensure alignment with local regulatory expectations and reporting best practices. The Group’s disclosures are further guided by internationally recognised frameworks, including the Global Reporting Initiative (“GRI”) Sustainability Reporting Standards and the United Nations Sustainable Development Goals (“UN SDGs”), which inform the identification of material sustainability matters and performance indicators.

In addition, the Group applies the GPM® P5™ Standard for Sustainability in Project Management to integrate environmental, social and economic considerations across the project lifecycle. This structured approach supports consistent sustainability integration within project planning, execution and governance, reinforcing accountability and long-term value creation.

Sustainability Statement (cont'd)

Upholding Data Integrity



This Sustainability Statement is not subjected to any specific review by the Company’s internal auditors or external assurance by independent parties. The Group has established structured internal processes for the collection, monitoring and consolidation of sustainability data, supported by clearly defined roles and responsibilities across management and operational teams. Sustainability information disclosed in this Statement is derived from internal records, operational data and relevant stakeholder inputs and is subject to internal review to ensure accuracy, completeness and consistency to the best of the Group’s capabilities.

Recognising the evolving expectations of stakeholders and regulators, NCT Alliance continues to enhance its data management practices and is exploring the adoption of third-party assurance in future reporting periods as part of its commitment to strengthening the reliability and credibility of its sustainability disclosures.

Driving Change with Feedback

The Group values stakeholder feedback as a key driver for the continuous improvement of its sustainability practices and disclosures. Feedback on this Sustainability Statement and the Group’s sustainability performance is welcomed and may be directed to the Group Sustainability at esg@nctalliance.com. Inputs received will be considered as part of ongoing stakeholder engagement and future reporting enhancements.

2025 Sustainability Awards and Recognitions

Awards and Recognition	Description
<p>Sustainability Champion – Asia Pacific Sustainability CEO Awards 2025</p>	<p>Recognition for leadership in advancing sustainability practices and integrating ESG considerations into organisational strategy and operations.</p> 
<p>Company of the Year (Property Developer) – Outstanding Community Spirit Award, Sustainability & CSR Awards 2025</p>	<p>Award recognising the Group’s contributions to community development and social responsibility initiatives, reflecting stakeholder engagement and social impact.</p> 

Sustainability Statement (cont'd)

2025 Sustainability Awards and Recognitions (cont'd)

Awards and Recognition	Description
<p>GreenRE Provisional Certifications – Township Development</p> <ul style="list-style-type: none"> • NCT Smart Industrial Park • NCT InnoSphere • Ion Marina Bay 	<p>Provisional certifications awarded to selected developments in recognition of sustainability features incorporated at the design stage, including energy efficiency, water management and environmental considerations, subject to final assessment upon completion.</p>
<p>Low Carbon Cities Framework (LCCF) – Five-Diamond Recognition</p>	<p>Recognition awarded under the Low Carbon Cities Framework for the integration of low-carbon strategies in township planning and development, including energy efficiency, emissions reduction measures and sustainable urban design.</p> 
<ul style="list-style-type: none"> • HR Asia Best Companies to Work for in Asia 2025 • HR Asia Sustainable Workplace Award 2025 • HR Asia Tech Empowerment Award 2025 	<p>Recognition based on employee engagement and workplace practices, reflecting efforts to foster a positive, inclusive and supportive work environment.</p>  

Sustainability Statement (cont'd)

From Past to Present, Paving Our Sustainability Journey

2024

Integrated Standards of Sustainable Practice

- Implemented **P5 Framework** to support the integration of sustainability elements – **The P5 Framework. Product, Process, People, Planet, and Prosperity** into operations and projects.

2023

Aligned with Task-Force on Climate-Related Financial Disclosures

- Conducted a **Materiality Re-assessment on 16 Material Matters**
- Began reporting **Scope 3 emissions**
- Began reporting on the **Task-Force on Climate-Related Financial Disclosures (“TCFD”)**

2020

2019

2018

Driven by 8 Sustainability Core Values

- Guided by **8 Sustainability Core Values (Team Cooperation, Customer Satisfaction, Integrity, Reliability, Commitment, Innovation, Positive Attitude and Loyalty)**
- Identified **7 Material Sustainability Matters**

2025

Sustainability Leadership Recognised

- **Achieved regional and national** sustainability recognitions
- **Awarded Sustainability Champion** at the Asia Pacific Sustainability CEO Awards 2025
- **Conferred Company of the Year (Property Developer) – Outstanding Community Spirit Award** at the Sustainability & CSR Awards 2025
- **Received the Malaysia GPM Sustainability Award – Project of the Year 2024**
- **Honoured with Triple Recognition at HR Asia Awards 2025**
 - ▶ HR Asia Best Companies to Work for in Asia 2025
 - ▶ HR Asia Sustainable Workplace Award
 - ▶ HR Asia Tech Empowerment Award
- These recognitions reinforce the Group’s position as a responsible, forward-looking and sustainability-driven property developer

2022

Established an ESG Framework

- Adopted **Bursa Malaysia’s Sustainability Reporting Guide (3rd Edition) and GRI Standards (2018)**
- Identified **4 pillars: Governance, Economic, Social and Environment**
- Adopted **6 UN SDGs**
- Reviewed and identified **16 Material Matters**
- Adopted **new policies: Director’s Fit & Proper Policy and Privacy Policy**
- Began reporting **Scope 1 and Scope 2 emissions**

2021

Aligned with Bursa Malaysia’s Sustainability Reporting Guide (2nd Edition) and GRI Standards

- Established **Sustainability Policy**
- Conducted a **Materiality Assessment** and identified **15 Material Matters**
- Adopted **3 UN SDGs** to align with our ESG initiatives
- Adopted a **Safety and Health Policy**
- Established a **Safety and Health Committee (“SHC”)**
- Established **Anti-Bribery and Anti-Corruption (“ABAC”) Policy and Whistleblowing Policy**
- Began reporting our **Energy Consumption, Water Consumption and Waste Generation**

2017

Published Inaugural Sustainability Statement

- Aligned with the **Bursa Malaysia Main Market Listing Requirements**
- Established a **3-tier Sustainability Governance Structure**
- Identified **6 Material Sustainability Matters** and **6 Stakeholder Groups**

Sustainability Statement (cont'd)

Reflecting on Key 2025 Achievements

Governance and Responsible Business	Investing with Integrity	Constructing Thriving Communities	Shifting Towards Low-Carbon
ZERO substantiated complaints relating to customer data privacy and security breaches.	100% procurement spend on local vendors.	ZERO cases of harassment, discrimination or human rights violations reported.	Reported on Scope 1, 2 and 3 GHG emissions.
ZERO instances of non-compliance with the Group's Anti-Bribery and Corruption ("ABAC") Policy.	ZERO substantiated complaints relating to unethical investment or procurement practices.	Recorded a total of 1,536 training hours in FYE 2025.	10.57 tonnes of waste recycled and diverted from landfills since 2024.
ZERO confirmed cases of corruption or unethical conduct recorded.		Recorded 0% fatalities across the Group.	133,273.60 kWh of total energy consumption at HQ is sourced from renewable solar energy.
16.67% women representation on the Board.		Zero incidents of non-compliance with regard to labour matters.	GreenRE Provisional Certifications for 3 Townships .
60.64% of employees received anti-bribery and corruption training.		Invested a total of RM 251,654 to the community.	Five-diamond recognition for NCT Smart Industrial Park at Low Carbon City Awards 2024.
			Employed licensed contractors to manage and dispose of all of our properties' waste in compliance with applicable regulatory requirements.
			Established Sustainability Policy, Waste Management Policy, Energy Management Policy and Water Management Policy .

Sustainability Statement (cont'd)

The Supporting ESG Framework

In FYE 2025, the Group continued to strengthen its ESG Framework, reinforcing the integration of sustainability considerations across corporate strategy, governance structures and operational decision-making. The framework remains a key mechanism for identifying, managing and monitoring ESG risks and opportunities, supporting responsible growth and long-term value creation.

During the year, the ESG Framework was further enhanced through the formalisation of additional sustainability-related policies and the expanded monitoring of greenhouse gas emissions, including broader Scope 3 emission categories. Governance practices were also strengthened to improve oversight, data consistency and accountability across the Group.

These enhancements ensure that the ESG Framework remains aligned with evolving regulatory requirements, including the National Sustainability Reporting Framework (NSRF), as well as stakeholder expectations and sustainability priorities relevant to the property development sector, positioning the Group for continued progress in its sustainability journey.

OUR VISION

Creating World-Class Masterpiece

OUR MISSION

To create architectural masterpieces that are renowned and respected worldwide	Incorporate persistence for improvement and advancement of our team, brand, products and services	Advocate quality as the precedent, combined with robust commitment in providing the best solutions to our esteemed customers	To develop new tourism-centric properties and refurbish existing ones to boost the local tourism industry
To stay ahead of the new wave of online marketing technology for tourism, hospitality and the retail industry through the establishment of the new O2O strategy	Practice professionalism, uphold integrity and create lasting relations by working genuinely and impartially with our customers, business affiliates and stakeholders	To develop new smart industrial parks and enhance existing developments to drive industrial growth and long-term economic value	

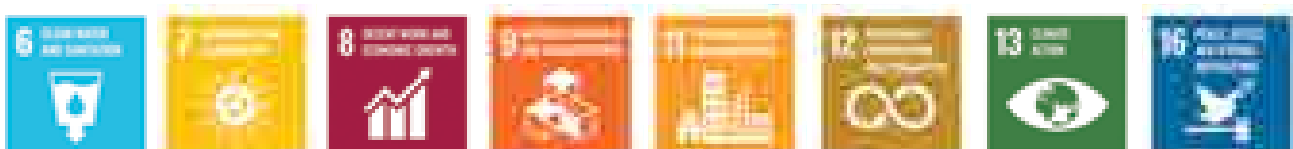
OUR CORE VALUES

Integrity Teamwork	Striving for Excellence	Passionate Customer	Innovation
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OUR SUSTAINABILITY PILLARS AND MATERIAL SUSTAINABILITY MATTERS

Governance and Responsible Business	Investing with Integrity	Constructing Thriving Communities	Shifting Towards Low-Carbon
<ul style="list-style-type: none"> Legal and Regulatory Compliance Corporate Governance and Anti-Corruption Data Privacy and Cybersecurity 	<ul style="list-style-type: none"> Economic Performance Supply Chain Management 	<ul style="list-style-type: none"> Customer Satisfaction Occupational Health and Safety Employee Engagement Labour Practices and Standards Diversity and Inclusiveness Community Engagement 	<ul style="list-style-type: none"> Climate Resilience and Energy Management Water Management Sustainable Materials Innovation and Technology Waste Management and Effluents

OUR CONTRIBUTIONS TO THE UN SDGS



Sustainability Statement (cont'd)

The Supporting ESG Framework (cont'd)



Policies Underpinning Our Sustainability

In FYE 2025, the Group continued to strengthen its policy framework to support the effective implementation of its sustainability strategy. These policies reinforce the Group’s core values and establish clear ethical standards, responsibilities and expectations for employees, contractors and business partners, strengthening accountability across ESG commitments.

During the year, the Group enhanced its policy suite through the formalisation and implementation of key sustainability-related policies. These provide clearer guidance on environmental management, ethical conduct, data protection and governance practices. Collectively, these policies support consistent decision-making, regulatory compliance and responsible development practices, underpinning the Group’s role as a conscientious property developer.

Key Sustainability-Related Policies

The Group’s sustainability framework is underpinned by the following policies:



These policies are communicated across the organisation and reviewed periodically to ensure continued relevance in line with evolving regulatory requirements, stakeholder expectations and the Group’s sustainability priorities.

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines

PRISM™ (PROJECTS INTEGRATING SUSTAINABLE METHODS)

The PRISM™ methodology was applied to evaluate and integrate sustainability within its projects. PRISM™ is a principles-based project management approach centred on value maximisation and the sustainable lifecycle of assets.

PRISM™ elevates project management to a strategic level by leveraging existing organisational systems and embedding sustainability considerations across the project lifecycle. This methodology is grounded in the P5 Standard for Sustainability in Project Management, which is internationally recognised for its effectiveness.

Through its emphasis on environmental, social, and economic risk reduction, PRISM™ enhances the achievement of long-term project benefits. Its five-phased framework extends beyond conventional project lifecycles to incorporate pre-project planning, product or service adoption, integration, and benefits realisation. The methodology is supported by a workflow designed by GPM experts, ensuring a comprehensive and sustainability-driven project approach.



Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

GPM P5 STANDARDS

The GPM P5 Standard offers a comprehensive framework for integrating sustainability into project management by assessing project impacts across the dimensions of People, Planet, and Prosperity, as well as through the lenses of Product and Process. In applying this framework, NCT Alliance is able to identify material sustainability topics more effectively, ensuring alignment with stakeholder priorities, consistency with global standards, and a clear focus on areas of significant impact.



The P5 Ontology

The P5 ontology classifies impacts into three core categories People, Planet, and Prosperity, each of which is further divided into specific subcategories and elements.

- The People category: centres on stakeholder impacts, examining how projects influence employees, customers, suppliers, and surrounding communities. This lens supports the identification of material topics such as employee well-being, diversity and inclusion, and community engagement.
- The Planet category: focuses on environmental considerations, including resource use, emissions, waste, and biodiversity protection. Through this perspective, material topics such as energy efficiency, carbon management, and ecological sustainability emerge.
- The Prosperity category: assesses the financial and economic outcomes of projects, drawing attention to areas such as economic value creation, responsible supply chains, and overall market competitiveness.
- The Product category: assesses the lifecycle impacts of a company’s products or services, helping to pinpoint topics like product responsibility, sustainable innovation, and lifecycle management.
- The Process category: focuses on the integration of sustainability within operational practices, identifying governance, risk management, compliance, and innovation as material topics.

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

ALIGNING THE GPM P5 STANDARD TO THE UN SDGS, GRI AND BURSA

The GPM P5 Standard provides a structured methodology for identifying material topics. Organisations can align the five P5 dimensions with industry-specific challenges and stakeholder priorities, conduct materiality assessments to prioritise topics based on both business impact and stakeholder interest, and benchmark outcomes against international frameworks such as the Global Reporting Initiative (GRI) and the United Nations Sustainable Development Goals (SDGs). The standard also emphasises continuous monitoring and feedback to ensure material topics remain relevant as business contexts and stakeholder expectations evolve.

The chart below illustrates the mapping of GPM P5 elements to the SDGs, GRI Disclosures, and the Bursa Malaysia Sustainability Reporting Guide (3rd Edition).

The GPM P5 Standard also offers a structured methodology to determine material topics. Companies can map the five dimensions against industry-specific challenges and stakeholder priorities, conduct materiality assessments to prioritize topics based on business impact and stakeholder interest, and benchmark findings against global frameworks like the Global Reporting Initiative (“GRI”) or the United Nations Sustainable Development Goals (SDGs). Furthermore, the standard encourages continuous monitoring and feedback to refine material topics as business and stakeholder expectations evolve.

The chart below shows the mapping between GPM P5 elements, the United Nations Sustainable Development Goals (SDGs), the GRI Standards, and the Bursa Malaysia Sustainability Reporting Guide (3rd Edition).

Sustainability		Global Development Goals	International Reporting	National Reporting	
GPM P5 Standard		UN SDGs	GRI	BURSA	
					
Sustainability Category	Sustainability Sub-Category	Sustainability Elements	SDG #	GRI Disclosures	Bursa Disclosures
People Impacts (Social)	Labor Practices and Decent Work	Employment and Staffing	SDG 8	GRI 401-1 GRI 202-1 GRI 202-2	Bursa C3(a) Bursa C3(b) Bursa C6(b) Bursa C6(c)
		Labor/Management Relations	SDG 10	GRI 407-1 GRI 402-1	
		Project Health and Safety	SDG 3	GRI 403-9 GRI 403-5	Bursa C5(a) Bursa C5(b) Bursa C5(c)
		Training and Qualification	SDG 4	GRI 404-1 GRI 403-5 GRI 205-2	Bursa C1(a) Bursa C5(c) Bursa C6(a)
		Organisational Learning	SDG 16		
		Equal Opportunity	SDG 10		
		Local Competence Development	SDG 4		
		Work-Life Harmony and Mental Health	SDG 3		

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

ALIGNING THE GPM P5 STANDARD TO THE UN SDGS, GRI AND BURSA (cont'd)

Sustainability	Global Development Goals	International Reporting	National Reporting
GPM P5 Standard	UN SDGs	GRI	BURSA



Sustainability Category	Sustainability Sub-Category	Sustainability Elements	SDG #	GRI Disclosures	Bursa Disclosures
People Impacts (Social)	Society and Customers	Community Engagement	SDG 11	GRI 413-1 GRI 413-2	Bursa C2(a) Bursa C2(b)
		Public Policy and Compliance	SDG 10	GRI 2-23	
		Protection for Indigenous and Tribal Peoples	SDG 11	GRI 411-1	
		Customer Health and Safety	SDG 3	GRI 416-1	
		Product and Service Labeling	SDG 12	GRI 417-1	
		Customer Privacy and Data Protection	SDG 16 SDG 17	GRI 418-1	Bursa C8(a)
	Human Rights	Harassment and Discrimination	SDG 10 SDG 5	GRI 406-1	Bursa C6(d)
		Age-Appropriate Labor	SDG 8 SDG 16	GRI 408-1 GRI 409-1	
		Forced and Involuntary Labor	SDG 8	GRI 408-1 GRI 409-1	
		Dignity, Diversity, Equity, and Inclusion	SDG 8 SDG 10	GRI 405-1	
	Ethical Behavior	Sustainable Procurement Practices and Contracts	SDG 12	GRI 414-1 GRI 308-1	
		Anti-Corruption	SDG 16	GRI 205-3 GRI 205-2 GRI 205-1	Bursa C1(a) Bursa C1(b) Bursa C1(c)
		Fair Competition	SDG 16	GRI 206-1	
		Responsible Technology	SDG 17		
		Green Claims and Greenwashing	SDG 12		

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

ALIGNING THE GPM P5 STANDARD TO THE UN SDGS, GRI AND BURSA (cont'd)

Sustainability	Global Development Goals	International Reporting	National Reporting
GPM P5 Standard	UN SDGs	GRI	BURSA







Sustainability Category	Sustainability Sub-Category	Sustainability Elements	SDG #	GRI Disclosures	Bursa Disclosures
Planet Impacts (Environment)	Transport	Local Procurement	SDG 12	GRI 308-1 GRI 204-1	Bursa C7(a)
		Digital Communication	SDG 9		
		Traveling and Commuting	SDG 12 SDG 13		
		Logistics	SDG 12 SDG 13		
	Energy	Energy Consumption	SDG 7 SDG 12 SDG 13	GRI 302-1 GRI 302-4	Bursa C4(a)
		Greenhouse Gas Emissions	SDG 12 SDG 13	GRI 305-1 GRI 305-2 GRI 305-5 GRI 305-3	Bursa C11(a) Bursa C11(b) Bursa C11(c)
		Renewables and Clean Energy Return	SDG 7 SDG 12 SDG 13		
	Land, Air, and Water	Biological Diversity	SDG 14 SDG 15	GRI 304-2	
		Air and Water Quality	SDG 3 SDG 15		
		Water Consumption	SDG 6	GRI 303-5	Bursa C9(a)
		Water Displacement	SDG 6		
		Soil Erosion and Regeneration	SDG 15		
		Noise Pollution	SDG 11		
	Consumption	Recycling and Reuse	SDG 12	GRI 306-4 GRI 301-2	
		Disposal	SDG 12	GRI 306-4 GRI 306-5 GRI 301-1	Bursa C10(a)(i) Bursa C10(a)(ii)
		Contamination and Pollution	SDG 12	GRI 306-3 GRI 306-4 GRI 306-5	
Waste Generation		SDG 12	GRI 306-1 GRI 306-3	Bursa C10(a)	

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

ALIGNING THE GPM P5 STANDARD TO THE UN SDGS, GRI AND BURSA (cont'd)

Sustainability		Global Development Goals	International Reporting	National Reporting	
GPM P5 Standard		UN SDGs	GRI	BURSA	
					
Sustainability Category	Sustainability Sub-Category	Sustainability Elements	SDG #	GRI Disclosures	Bursa Disclosures
Prosperity Impacts (Economy/Governance)	Project Feasibility	Business Case Analysis	SDG 1	GRI 2-9 GRI 201-1	
		Financial Analysis	SDG 1	GRI 201-1	
		Social Return on Investment	SDG 17		
		Modeling and Simulation	SDG 1		
	Business Agility	Flexibility/Optionality	SDG 17	GRI 2-3 GRI 2-23 GRI 2-24	
		Resiliency	SDG 1	GRI 2-3 GRI 2-23 GRI 2-24	
	Market and Economic Stimulation	Local Economic Impact	SDG 1	GRI 202-1 GRI 202-2	
		Indirect Benefits	SDG 1	GRI 203-1 GRI 203-2	
		ESG Disclosures and Sustainability Reporting	SDG 17		

By adopting the GPM P5 Standard, NCT Alliance can ensure that its material topics are comprehensive, strategically relevant, and aligned with the company’s overall sustainability objectives. This systematic approach strengthens stakeholder confidence and reinforces NCT Alliance’s positioning as a leader in sustainable development.

NATIONAL SUSTAINABILITY REPORTING FRAMEWORK (“NSRF”) – YEAR 2025 ONWARDS

In FYE 2025, the NSRF was introduced in Malaysia under a phased implementation approach for Main Market listed companies and large corporations.

The NSRF adopts the IFRS Sustainability Disclosure Standards (IFRS S1 and IFRS S2) issued by the International Sustainability Standards Board (“ISSB”), establishing a baseline for sustainability disclosures in Malaysia.

The Group is progressively enhancing its sustainability practices and reporting processes to align with NSRF requirements. This includes strengthening data collection systems, expanding disclosure scope and improving governance structures, particularly in areas such as climate-related metrics and value chain considerations.

These efforts position the Group to support future compliance and enhance transparency in line with evolving regulatory expectations.

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

DRIVING PROGRESS IN THE GLOBAL GOALS

The United Nations Sustainable Development Goals (UN SDGs) consist of 17 interconnected goals aligned with the 5Ps (People, Planet, Prosperity, Peace, and Partnerships). Intended to address urgent social and environmental challenges globally by 2030, they serve to inspire collective action among organisations and governmental bodies worldwide for a more equitable future. In line with these goals, NCT Alliance aligns with eight UN SDGs, contributing to global efforts while delivering measurable environmental, social and economic value across its operations.

	<p>SDG 6: Clean Water and Sanitation</p> <p>Targets:</p> <p>6.4 – Improve water-use efficiency and ensure sustainable withdrawals</p>	<ul style="list-style-type: none"> • Monitored water consumption across operations to support efficient water use and resource planning. • Implemented rainwater harvesting and water management practices, where applicable, to reduce reliance on municipal water supply. • Strengthened water data tracking and monitoring, supporting continuous improvement in water efficiency.
	<p>SDG 7: Affordable and Clean Energy</p> <p>Targets:</p> <p>7.2 – Increase the share of renewable energy</p> <p>7.3 – Improve energy efficiency</p>	<ul style="list-style-type: none"> • Expanded renewable energy adoption through solar PV installations and solar-ready infrastructure. • Improved energy efficiency through energy management initiatives and monitoring of electricity consumption.
	<p>SDG 8: Decent Work and Economic Growth</p> <p>Targets:</p> <p>8.5 – Promote productive employment and decent work</p> <p>8.8 – Protect labour rights and ensure safe working environments</p>	<ul style="list-style-type: none"> • Complied with applicable labour laws and upheld decent work standards, including fair wages, safe working conditions and social protection. • Maintained a zero-tolerance stance towards child labour, forced labour and involuntary labour across operations. • Recorded a total of 1,536 training hours in FYE 2025, supporting employee capability development and workplace competencies. • Achieved 0% fatalities and zero work-related injuries across the Group.
	<p>SDG 9: Industry, Innovation and Infrastructure</p> <p>Targets:</p> <p>9.1 – Develop quality, reliable, sustainable and resilient infrastructure</p> <p>9.4 – Upgrade infrastructure and retrofit industries to make them sustainable</p>	<ul style="list-style-type: none"> • Integrated green building and resource-efficient technologies, including LED lighting, sustainable materials and water-saving systems, to enhance the environmental performance of developments. • Deployed digital, AI and IoT-enabled platforms with real-time monitoring at NCT Smart Industrial Park to optimise energy use, infrastructure efficiency and mobility. • Advanced innovation through solar-ready infrastructure and internal digitalisation, enabling renewable energy adoption and improving operational efficiency, knowledge-sharing and customer experience.

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

DRIVING PROGRESS IN THE GLOBAL GOALS (cont'd)

	<p>SDG 11: Sustainable Cities and Communities</p> <p>Targets: 11.1 – Ensure access for all to adequate, safe and affordable housing</p>	<ul style="list-style-type: none"> • Delivered sustainable and well-planned developments by incorporating resource-efficient construction practices and materials to minimise waste and improve build quality. • Integrated sustainability considerations into township and project planning, supporting safe, functional and resilient communities. • Supported community well-being through responsible development and community investment initiatives, contributing to inclusive and liveable environments.
	<p>SDG 12: Responsible Consumption and Production</p> <p>Targets: 12.5 – Reduce waste generation through prevention, reduction, recycling and reuse</p>	<ul style="list-style-type: none"> • Implemented responsible waste management practices across operations, including segregation, monitoring and disposal through licensed contractors in compliance with regulatory requirements. • Optimised resource use through operational controls and policies, supporting reduced waste generation. • Strengthened data tracking and monitoring processes to enhance transparency and support continuous improvement in waste and resource management.
	<p>SDG 13: Climate Action</p> <p>Targets: 13.2 – Integrate climate measures into policies and planning</p>	<ul style="list-style-type: none"> • Monitored and disclosed greenhouse gas (“GHG”) emissions across Scope 1, Scope 2 and Scope 3 categories. • Implemented energy efficiency and renewable energy initiatives, including solar PV installations, to reduce emissions and improve energy resilience. • Strengthened climate-related data collection and monitoring to support ongoing emissions reduction efforts and climate risk management.
	<p>SDG 16: Peace, Justice and Strong Institutions</p> <p>Targets: 16.5 – Reduce corruption and bribery 16.6 – Develop effective, accountable and transparent institutions</p>	<ul style="list-style-type: none"> • Maintained a zero-tolerance approach to bribery, corruption and unethical conduct, with no confirmed incidents reported during the reporting year. • Strengthened governance through policies and controls, including the Code of Conduct, Ethics, Anti-Bribery, Corruption Policy and Whistleblowing Policy. • Enhanced ethical awareness through employee training and accessible reporting channels, supporting transparency, accountability and institutional integrity.

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

REINFORCING INTEGRITY WITH ETHICAL GOVERNANCE

NCT has established a robust Sustainability governance structure to ensure effective integration of sustainability principles into its business operations. The governance framework is built on a three-tier hierarchy comprising the Board of Directors, the Sustainability Chairman, the Sustainability Committee and Operational Working Groups. The Board provides strategic oversight and sets the company's long-term sustainability vision, while the Sustainability Committee develops policies and monitors Sustainability implementation. Operational Working Groups, divided into pillars such as Environment, Social, and Governance, execute sustainability initiatives at the ground level. This structured approach facilitates alignment of Sustainability objectives across all levels of the organisation, ensuring accountability and consistent progress.



NCT Sustainability Governance Structure

Furthermore, NCT Alliance has established a structured approach to develop and strengthen sustainability-related skills and competencies across its governance hierarchy. This framework ensures that all levels of the organisation possess the capabilities necessary to support the company's sustainability objectives effectively.

Board of Directors

During the reporting year, the Board participated in ESG briefing sessions to enhance its awareness and understanding of sustainability matters relevant to the Group's operations. These briefings provide updates on key ESG topics, regulatory developments and sustainability trends, supporting the Board's ability to consider sustainability factors in its oversight and decision-making.

ESG-related updates are shared with the Board on an as-needed basis, in line with business requirements and emerging sustainability considerations.

Sustainability Chairman and Sustainability Committee

Leadership and technical capabilities of the Sustainability Chairman and Committee members are reviewed during Committee planning sessions and KPI assessments. Internal workshops are conducted to strengthen understanding of ESG strategy, providing practical guidance on integrating sustainability considerations into decision-making and project oversight. This approach ensures that Committee members are prepared to guide organisational sustainability initiatives effectively.

ESG Task Force and Department Heads

Competencies for ESG Task Force members and department heads are assessed through KPI performance reviews and project evaluations. Skills development focuses on practical, hands-on experience, including on-the-job ESG training, sessions on data collection, reporting, and environmental performance tracking. Additionally, participation in industry forums and sustainability conferences is encouraged to expose leaders to emerging best practices and global trends in sustainability.

Sustainability Department

The Sustainability Department undergoes annual competency mapping to ensure alignment with the latest reporting frameworks and evolving industry standards. Skill development for the department includes external technical training and active collaboration with professional bodies. This enables the team to maintain technical expertise, improve reporting quality, and strengthen NCT Alliance's overall sustainability performance.

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

ENGAGING STAKEHOLDERS FOR EXCELLENCE

Fostering regular engagement with our stakeholder network is integral to aligning our strategies with their expectations and requirements. We solicit their perspectives through diverse channels, thoroughly considering their concerns to develop responsive strategies that generate shared value for both business and stakeholders.

SHAREHOLDERS AND INVESTORS

Area of Concern	NCT Alliance's Response to Concerns	Engagement Channels	Frequency of Engagement
<ul style="list-style-type: none"> • Corporate direction and growth • Financial and sustainability performance • Risk management • Corporate governance • Return on investment 	<ul style="list-style-type: none"> • Clearly communicate the Company's long-term vision and strategic goals to stakeholders • Publish comprehensive financial reports and sustainability reports • Regularly assess and identify risks to the business, both internal and external • Highlight strategies and initiatives aimed at creating sustainable long-term value for investors 	<ul style="list-style-type: none"> • General meetings • Reports, press release and company's website • Announcements • Quarterly analyst • Meeting with bankers 	<ul style="list-style-type: none"> • On-going • Periodically • Annually • Quarterly • Ad-hoc basic

GOVERNMENT AND REGULATORS

Area of Interest/Concern	NCT Alliance's Response to Concerns	Engagement Channels	Frequency of Engagement
<ul style="list-style-type: none"> • Compliance • Anti-corruption • Security issue • Approval and permits • Corporate governance 	<ul style="list-style-type: none"> • Conduct regular internal and external audits to ensure compliance with relevant laws, regulations, and industry standards • Enforce a comprehensive anti-corruption policy that clearly outlines the Group's stance on bribery and corruption • Implement robust security measures • Maintain a systematic approach to document and track all approvals and permits 	<ul style="list-style-type: none"> • Establishment of policies • Regulator's portal • Meetings and consultations • Training programmes and dialogue • Audit and verification 	<ul style="list-style-type: none"> • On-going • Periodically • Annually • Quarterly • Ad-hoc basic




CONTRACTORS, VENDORS AND SUPPLIERS

Area of Interest/Concern	NCT Alliance's Response to Concerns	Engagement Channels	Frequency of Engagement
<ul style="list-style-type: none"> • Fair procurement practices • Payment/credit terms • Competitive pricing • Legal compliances 	<ul style="list-style-type: none"> • Establish clear and transparent procurement policies • Establish open communication channels with vendors • Conduct thorough market research to understand prevailing pricing trends • Conduct regular legal compliance audits 	<ul style="list-style-type: none"> • Interviews and meetings • Contract negotiation and vendor registration • Assessment and performance review 	<ul style="list-style-type: none"> • On-going • Periodically • Ad-hoc basic

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

ENGAGING STAKEHOLDERS FOR EXCELLENCE (cont'd)

 CUSTOMERS			
Area of Interest/ Concern	NCT Alliance's Response to Concerns	Engagement Channels	Frequency of Engagement
<ul style="list-style-type: none"> Product quality and workmanship Pricing Product safety Defect rectification Return on investment Timely vacant possession handovers Customer services 	<ul style="list-style-type: none"> Implement robust quality assurance processes Adhere to all safety regulations Respond promptly to customer complaints Develop realistic project timelines Maintain open and responsive communication channels with customers 	<ul style="list-style-type: none"> Corporate campaigns, corporate website/social media Advertisement and marketing promotions, road shows Sales galleries 	<ul style="list-style-type: none"> On-going Periodically Ad-hoc basic
 EMPLOYEES			
Area of Interest/ Concern	NCT Alliance's Response to Concerns	Engagement Channels	Frequency of Engagement
<ul style="list-style-type: none"> Job security Remuneration and benefits Career development and training opportunities Workplace health and safety 	<ul style="list-style-type: none"> Foster a culture of employee engagement Offer a comprehensive benefits package, including health insurance, retirement plans, and other perks Provide ongoing training programmes Conduct regular safety training for employees 	<ul style="list-style-type: none"> Annual survey Performance appraisals Meetings and discussions Trainings Emails, memos and other communications platform 	<ul style="list-style-type: none"> On-going Periodically Annually Quarterly Ad-hoc basic
 LOCAL COMMUNITIES			
Area of Interest/ Concern	NCT Alliance's Response to Concerns	Engagement Channels	Frequency of Engagement
<ul style="list-style-type: none"> Impact on economy Impact on environment Transparency and accountability Communities welfare 	<ul style="list-style-type: none"> Prioritise local suppliers and contractors Implement environmentally friendly construction and development practices Maintain open communication channels with the community Develop and support community programmes 	<ul style="list-style-type: none"> Community engagement, annual report Corporate social responsibility programmes 	<ul style="list-style-type: none"> On-going Ad-hoc basic

Sustainability Statement (cont'd)

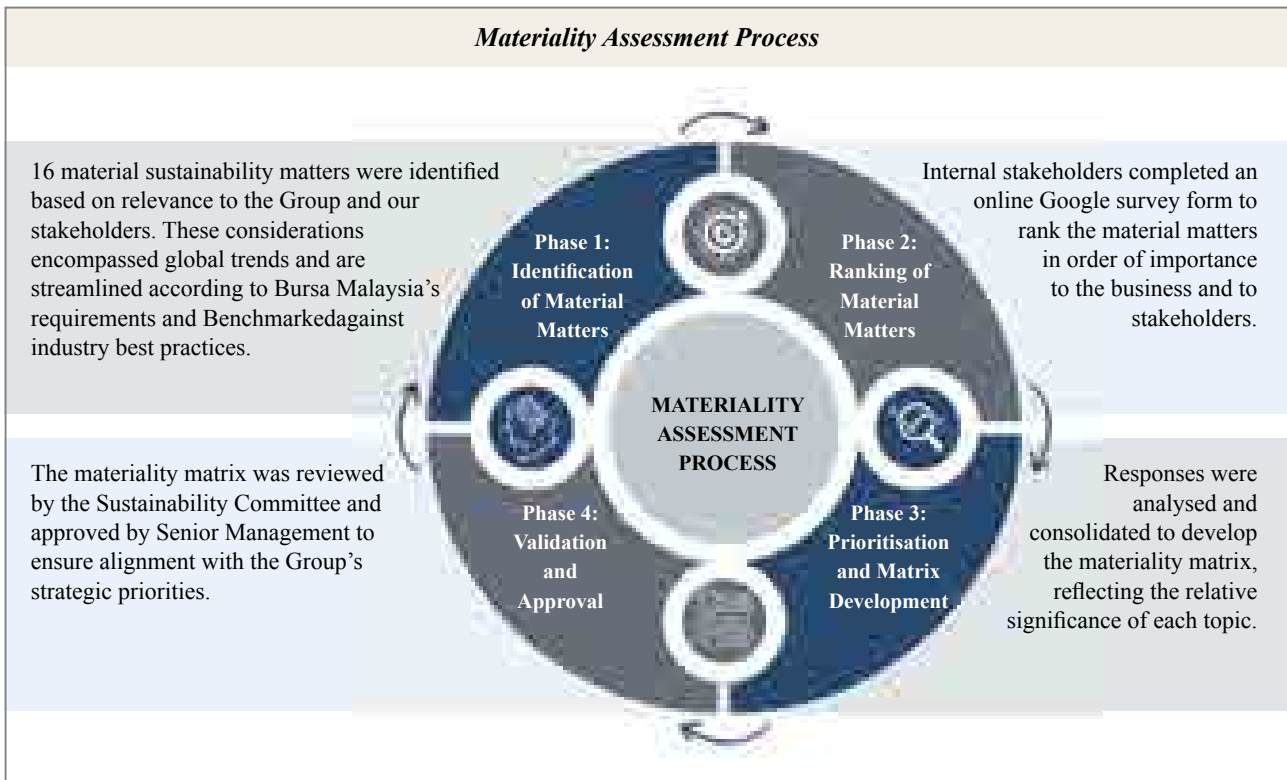
Sustainability Standards & Guidelines (cont'd)

ASSESSING AND UNDERSTANDING MATERIAL MATTERS

Materiality assessments enable the Group to identify, prioritise and manage the most significant sustainability matters that impact its business and stakeholders. These insights support informed decision-making, effective resource allocation and the integration of ESG considerations into the Group's overall strategy.

In FYE 2025, the Group conducted a sustainability materiality reassessment to reflect evolving stakeholder expectations, regulatory requirements and emerging ESG trends. The assessment was carried out in reference to Bursa Malaysia's Main Market Listing Requirements and the Sustainability Reporting Guide (3rd Edition), ensuring alignment with industry best practices.

Through this process, the Group identified key material sustainability matters that are critical to its long-term performance, risk management and value creation.



PLOTTING THE MATRIX

Following our materiality reassessment, we identified 16 material sustainability matters, which are mapped based on their significance to stakeholders and their impact on the Group's business operations. These topics are categorised across three degrees of significance which are Medium, High and Very High, enabling prioritisation of key ESG risks and opportunities.

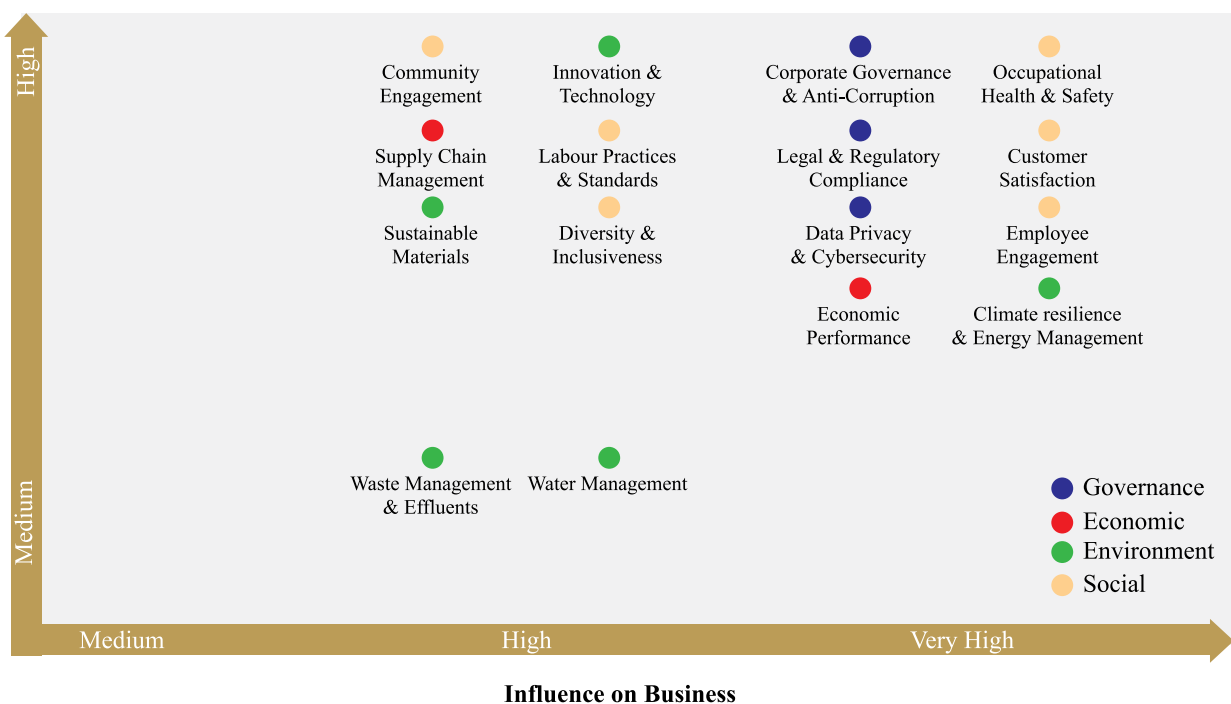
Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

PLOTTING THE MATRIX (cont'd)

Of the 16 matters, the top five for this year are **Corporate Governance and Anti-Corruption, Legal and Regulatory Compliance, Occupational Health and Safety, Economic Performance and Data Privacy and Cybersecurity.**

Importance of Stakeholders



Sustainability Statement (cont'd)














Sustainability Standards & Guidelines (cont'd)

CHARTING OUR MATERIAL ISSUES (cont'd)

We organised our material matters by their alignment with our adopted UN SDGs, key stakeholder groups and four sustainability pillars, effectively illustrating the interconnectedness between these facets.

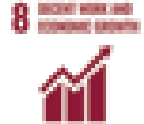





Governance and Responsible Business

Conducting our business with high standards of corporate governance and integrity is fundamental to maintaining stakeholder trust and long-term business sustainability. Strong governance practices support ethical conduct, regulatory compliance and investor confidence across the Group's operations.

Corporate Governance and Anti-Corruption	Maintaining ethical conduct and transparency through a zero-tolerance approach to bribery and corruption, supported by the Code of Conduct and Ethics, to reinforce accountability and investor confidence as a public-listed entity.	     
Legal and Regulatory Compliance	Ensuring adherence to applicable laws and regulations governing the Group's operations, including occupational health and safety, labour practices and environmental protection, to minimise regulatory risks and support business continuity.	  
Data Privacy and Security	Safeguarding customer and stakeholder information through robust data privacy and cybersecurity measures to prevent unauthorised access, protect sensitive information and preserve the Group's reputation.	   

Investing with Integrity

Monitoring long-term financial stability and sustainable growth is essential to support business resilience, operational efficiency and the Group's ability to adapt to changing economic conditions.

Economic Performance	Managing the Group's economic performance and financial impacts to generate sustainable economic value and support long-term value creation.	   
Supply Chain Management	Ensuring responsible sourcing and transparent procurement practices to promote operational efficiency and alignment with sustainability standards across the value chain.	 


Sustainability Statement (cont'd)







Sustainability Standards & Guidelines (cont'd)

CHARTING OUR MATERIAL ISSUES (cont'd)

Constructing Thriving Communities




Fostering a safe, inclusive and respectful environment for employees, customers and communities is essential to supporting workforce well-being, customer trust and the Group's long-term social licence to operate.




Customer Satisfaction	Maintaining customer trust and competitiveness by delivering quality products and services through consistent standards and effective communication.	
Occupational Health and Safety	Ensuring the safety and well-being of employees, contractors and the surrounding public through compliance with applicable health and safety laws and regulations.	
Employee Engagement	Supporting workforce retention, productivity and long-term stability through engagement initiatives, performance management and employee development.	
Labour Practices and Standards	Upholding fair labour practices, ethical working conditions and respect for human rights across the Group's operations and, where applicable, the supply chain.	
Diversity and Inclusiveness	Promoting equal opportunities and fostering an inclusive workplace culture to strengthen organisational resilience and innovation.	
Community Engagement	Building trust and positive relationships with local communities through targeted engagement and initiatives that support community well-being.	

Shifting Towards Low-Carbon

Minimising our environmental impact and carbon emissions by effectively managing energy, waste and water consumption.

Climate Resilience and Energy Management	Mitigating climate risks and impacts by monitoring greenhouse gas emissions and implementing energy-efficient practices.	
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Sustainability Statement (cont'd)





Sustainability Standards & Guidelines (cont'd)

CHARTING OUR MATERIAL ISSUES (cont'd)

Shifting Towards Low-Carbon (cont'd)

Minimising our environmental impact and carbon emissions by effectively managing energy, waste and water consumption. (cont'd)

Water Management	Ensuring responsible management and efficient utilisation of water resources in our operations.	
Sustainable Materials	Using sustainable building materials and practicing resource optimisation in our construction projects.	
Innovation and Technology	Incorporating digital technologies into our operations and customer service.	
Waste Management and Effluents	Managing the generation and disposal of waste within our operations.	

CLIMATE-RELATED APPROACH AND PROGRESS

NCT Alliance recognises climate change as a key risk and opportunity that may impact asset performance, operational continuity and long-term value creation. This is particularly relevant within the property development sector, where climate-related risks may affect project resilience, regulatory compliance and stakeholder expectations.

In FYE 2025, the Group continued to strengthen its climate-related approach by enhancing disclosures, improving data availability and expanding emissions tracking across its operations. These efforts support the integration of climate considerations into business decision-making and long-term strategic planning.

The Group has incorporated elements of IFRS S1 and IFRS S2, which reference to the recommendations of the Task Force on Climate-related Financial Disclosures (“TCFD”). This ensures a structured and globally consistent approach to identifying, assessing and managing climate-related risks and opportunities across four key pillars: Governance, Strategy, Risk Management, and Metrics and Targets.

Progress in FYE 2025

During the reporting year, the Group made the following progress in advancing its climate journey:

- expanding greenhouse gas (“GHG”) emissions reporting to include selected Scope 3 categories,
- establishing formal Energy Management and Water Management Policies, and
- implementing energy efficiency and renewable energy initiatives at corporate headquarters and project sites.

STRENGTHENING CLIMATE RESILIENCE AND DISCLOSURE

The Group recognises both physical and transition climate risks, which may impact operations, financial performance and long-term business sustainability. In response, the Group continues to enhance its climate-related disclosures and practices through:

- Improving data collection systems and emissions tracking capabilities
- Expanding the scope and quality of climate-related disclosures
- Strengthening environmental management practices across operations

Sustainability Statement (cont'd)

Sustainability Standards & Guidelines (cont'd)

STRENGTHENING CLIMATE RESILIENCE AND DISCLOSURE (cont'd)

These initiatives reflect the Group's commitment to improving climate transparency and building organisational readiness in line with evolving regulatory requirements, including the National Sustainability Reporting Framework ("NSRF") and IFRS Sustainability Disclosure Standards.

Transitioning Towards a Climate-Resilient Future

GOVERNANCE

- a) The Board of Director's oversight on climate-related risks and opportunities

Dato' Sri Yap Ngan Choy
Executive Chairman/Group Managing Director

Dato' Yap Fook Choy
Group Executive Director

Yap Chun Theng
Executive Director

Sae-Yap Atthakovit
Non-Independent Non-Executive Director

Yap Chui Fan
Independent Non-Executive Director

Allen Yap Kuan Kee
Independent Non-Executive Director

NCT Alliance's Board of Director

The Board of Directors retains overall responsibility for providing strategic oversight of the Group's sustainability direction, including climate-related considerations. Climate-related matters are addressed within broader discussions on operational performance, regulatory compliance, and long-term business resilience.

The Board's oversight focuses on ensuring that material environmental and climate-related risks are appropriately identified and considered in strategic decision-making, particularly for large-scale developments and capital-intensive projects. This approach supports prudent risk management while aligning climate considerations with the Group's growth strategy.

- b) Key Senior Management's role in assessing and managing climate-related risks and opportunities.

Eng Kim Haw
Chief Financial Officer

Mong Meng Wei
Chief Operating Officer

Yap Pui Yee
Head of Sales and Marketing

NCT Alliance's Key Senior Management Team

Senior Management is responsible for the day-to-day implementation of climate-related initiatives and the monitoring of environmental performance across operations. This includes implementing strategies, monitoring progress and ensuring compliance with relevant regulations and standards. Through proactive engagement with stakeholders and alignment with the Board's directives, management helps drive initiatives that enhance the company's ability to adapt to climate challenges and capitalise on sustainable opportunities.

STRATEGY

The Group identifies and assesses climate-related risks and opportunities across its operations, categorised into physical risks and transition risks, in accordance with IFRS S2 (with reference to TCFD recommendations).

Physical risks include acute and chronic impacts such as extreme weather events, rising temperatures and changing rainfall patterns. These risks may affect construction activities, asset durability and operational continuity.

Transition risks arise from evolving environmental regulations, stakeholder expectations, and market shifts towards low-carbon and resource-efficient developments. These risks may influence development costs, energy use and long-term asset competitiveness.

Sustainability Statement (cont'd)

Transitioning Towards a Climate-Resilient Future (cont'd)

STRATEGY (cont'd)

In response, the Group has taken measured steps to integrate climate considerations into its operational strategy, including:

- Improving energy efficiency at headquarters through the installation of rooftop solar photovoltaic (“PV”) systems,
- Incorporating resource-efficient design principles and green building standards in selected projects, and
- Expanding GHG emissions tracking to strengthen visibility over climate-related impacts.

While the Group has not yet conducted scenario analysis or quantitative climate stress testing, these initiatives represent foundational steps toward enhancing climate resilience and supporting informed decision-making over time.

Transition Risks

Transition Risks	Potential Impact	Opportunities
Policy and Legal	Stringent environmental regulations and policies aimed at reducing carbon emissions may impact the property industry.	Early alignment with evolving environmental regulations enables the Group to manage regulatory risks more effectively and prepare for changes in market and compliance expectations.
Technology	Advances in technology such as breakthroughs in low-carbon or alternative construction materials, could disrupt the construction processes. Failing to adopt or invest in innovative technologies may face competitive disadvantages.	Investing in and adopting innovative technologies that reduce carbon emissions in the property development process can position NCT Alliance as a leader in property development industry.
Supply Chain	Transition to a low-carbon economy may require changes in sourcing practices, availability and cost of construction materials. Misalignment with suppliers’ sustainability practices may disrupt project timelines and cost management.	Strengthening supplier engagement and promoting transparent procurement practices supports supply chain resilience and alignment with sustainability requirements.

Physical Risks

Physical Risks	Potential Impact	Opportunities
Acute	Extreme weather events such as heavy rainfall, flooding or storms may disrupt construction activities, damage infrastructure and affect site safety, potentially impacting project timelines and operational continuity.	Strengthening site planning, emergency preparedness and resilient design considerations can help reduce disruption and improve operational resilience during extreme weather events.

Sustainability Statement (cont'd)

Transitioning Towards a Climate-Resilient Future (cont'd)

STRATEGY (cont'd)

Physical Risks (cont'd)

Physical Risks	Potential Impact	Opportunities
Chronic	Long-term changes in climate conditions, including rising temperatures and altered rainfall patterns, may affect infrastructure performance, water availability and workforce health, leading to increased maintenance requirements and operational challenges over time.	Integrating climate-resilient design, resource-efficient systems and energy-efficient technologies supports adaptation to long-term climate impacts and helps manage operational risks.

RISK MANAGEMENT

NCT Alliance adopts a structured and progressive approach to identifying, assessing, and managing climate-related risks across its operations and value chain. Climate considerations are integrated into the Group's broader enterprise risk management framework to support informed decision-making and operational resilience.

The Group evaluates both **transition risks**, including regulatory developments, technology shifts, and market expectations associated with the transition to a low-carbon economy and **physical risks**, such as acute and chronic climate-related events that may affect project sites, infrastructure, and business continuity. These risks are assessed qualitatively based on potential operational, financial, and reputational impacts.

In FYE 2025, NCT enhanced its climate risk approach by strengthening monitoring of regulatory developments, energy performance, and supply chain dependencies, particularly in relation to energy use, greenhouse gas emissions, and contractor practices. Climate-related risks are considered within existing operational reviews and project planning processes, enabling early identification of vulnerabilities and response measures.

While formal scenario analysis and quantified climate risk modelling remain under development, the Group continues to build internal capacity and data readiness to progressively strengthen climate risk assessment and integration into strategic planning in future reporting periods, in line with evolving regulatory expectations and business needs.

METRICS AND TARGETS

NCT Alliance monitors key environmental performance indicators to track its climate- and resource-related impacts and to support transparent sustainability reporting. The Group currently measures and reports on greenhouse gas ("GHG") emissions, energy consumption, water use, and waste generation, using consistent methodologies across reporting periods.

- GHG emissions are measured in tonnes of carbon dioxide equivalent (tCO₂e) and reported across Scope 1, Scope 2, and selected Scope 3 categories, in alignment with the GHG Protocol.
- Energy consumption is measured in gigajoules (GJ).
- Water consumption is measured in megalitres (ML).
- Waste generation and diversion are measured in metric tonnes.

In FYE 2025, the Group expanded its emissions tracking to include additional Scope 3 categories, namely waste management, business travel, purchase goods and employee commuting, strengthening transparency and alignment with Bursa Malaysia and emerging IFRS-S2 expectations. Data collection processes continue to be refined to improve accuracy, consistency, and coverage across operations. These efforts will support the future development of measurable targets and decarbonisation pathways that are aligned with business strategy, regulatory developments, and national climate objectives.

Sustainability Statement (cont'd)

Governance and Responsible Business

Fundamental to our leadership's commitment to sustainable business practices, good governance guides our actions as a responsible corporate entity. It underpins our adherence to industry best practices, driving ethical conduct as well as compliance with legal and regulatory standards. At NCT Alliance, we also position ourselves as a trusted developer in the digital age, implementing robust data privacy and cybersecurity measures.

Material Sustainability Matters

- Corporate Governance and Anti-Corruption
- Legal and Regulatory Compliance
- Data Privacy and Cybersecurity

Stakeholders

- Shareholders and Investors
- Government and Regulators
- Contractors, Vendors and Suppliers
- Customers
- Employees



60.64%

of employees received anti-corruption training



ZERO

instances of non-compliance with our Anti-Bribery and Anti-Corruption ("ABAC") policy



ZERO

cases of data breach incidents recorded



ZERO

complaints regarding breaches of customer security and privacy

Sustainability Statement (cont'd)

Corporate Governance and Anti-Corruption

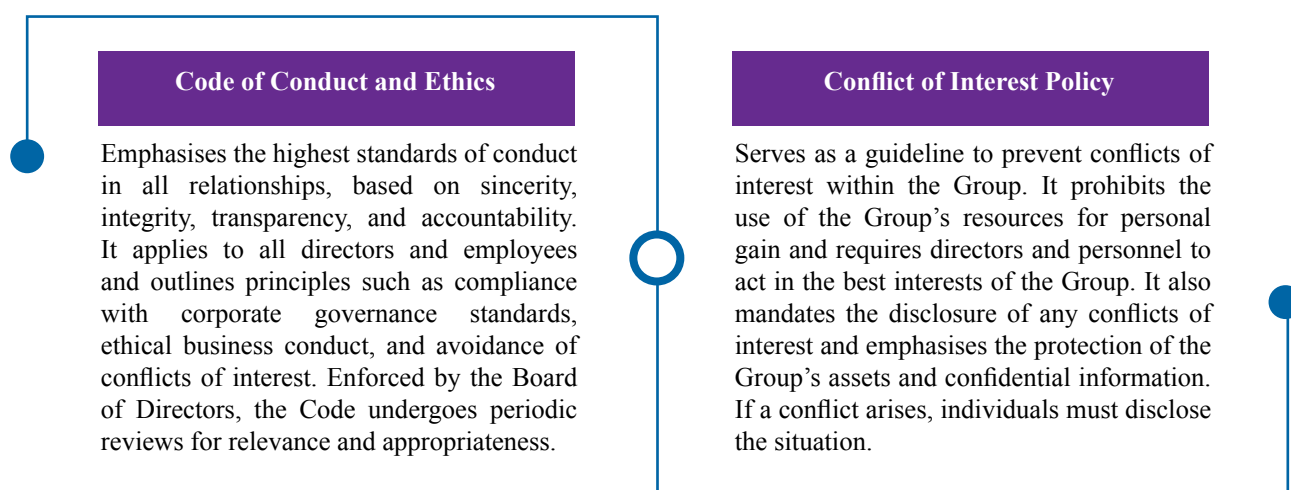
WHY IT MATTERS

Upholding strong governance practices is critical to maintaining integrity, transparency and accountability across the Group's operations. A robust governance framework supports ethical decision-making, mitigates risks and enhances stakeholder confidence in the Group's long-term sustainability.

OUR APPROACH

The Group operates in accordance with the Malaysian Code on Corporate Governance ("MCCG") 2021 and the Malaysian Anti-Corruption Commission ("MACC") Act 2009. To uphold ethical standards, we established a Code of Ethics and Conduct that outlines the ethical principles and standards for directors and employees. Grounded in integrity, this code governs our interactions with stakeholders to uphold the highest standards of conduct across all levels.

Employees must adhere to the guidelines delineated in the Employee Handbook and the Employee Code of Ethics and Conduct, in alignment with the Group's values and goals. Complementing these measures is the recently introduced Conflict of Interest Policy, aimed at proactively mitigating potential conflicts of interest among directors and employees.



Additionally, the Group has other policies and codes in place to further support responsible business practices.

- Board Charter
- Terms of Reference of the Audit Committee
- Terms of Reference of the Nomination and Remuneration Committee
- Nomination & Appointment of New Director Process and Procedures
- Anti-Bribery and Anti-Corruption Policy
- Director's Fit and Proper Policy
- Remuneration Policy
- Privacy Policy
- Whistleblowing Policy
- Anti-Money Laundering and Countering Financing of Terrorism Policy
- Vendor Code of Conduct and Ethics

For further details on NCT Alliance Berhad's corporate governance, please visit <https://www.nctalliance.com/corporate/corporate-overview/corporate-information>

Sustainability Statement (cont'd)

Corporate Governance and Anti-Corruption (cont'd)

Within the Group, there exist several established committees, each endowed with delineated responsibilities.

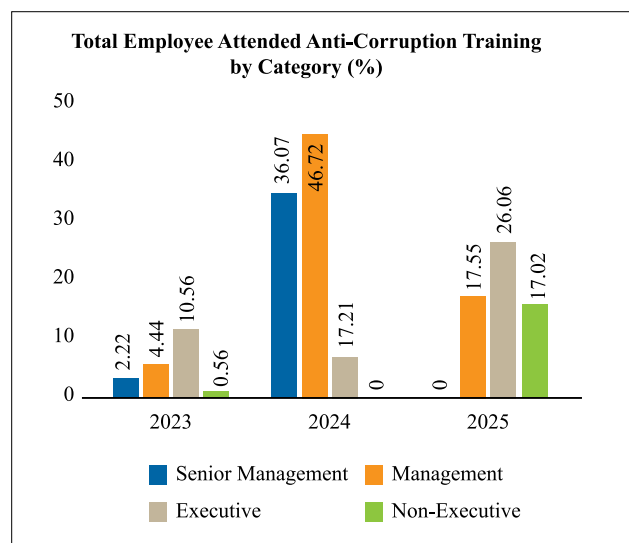
<p>Audit Committee</p> <ul style="list-style-type: none"> Operates under its own Terms of Reference within the Board’s purview Oversees financial reporting, internal controls and risk management processes. Reviews compliance with applicable laws, regulations and reporting requirements. 		<p>Nomination and Remuneration Committee</p> <ul style="list-style-type: none"> Operates under its own Terms of Reference within the Board’s purview Nominates the Board and Board Committee members and determines the remuneration of Directors and Senior Management
<p>Sustainability Committee</p> <ul style="list-style-type: none"> Identifies and approves sustainability targets Designs, implements and assesses sustainability strategies Incorporates new sustainability opportunities 		<p>Risk Management Committee</p> <ul style="list-style-type: none"> Identifies and assesses critical risks faced by the Group Reviews and manages the Management’s action plan Oversees risk-related activities Reviews the Group’s risk profile and organisational performance

OUR PERFORMANCE

This year, the Board participated in an ESG briefing session to enhance its understanding of sustainability matters. Such ESG training sessions are conducted on an as-needed basis to keep the Board informed of emerging sustainability developments and to strengthen its ability to address evolving risks and opportunities effectively.

During the reporting year, the Group conducted anti-bribery and corruption training covering 60.64% of employees at NCT Headquarters. This represents a significant improvement in training coverage compared to prior years. The Group maintains a zero-tolerance stance towards corruption and is pleased to report zero instances of non-compliance with the Anti-Bribery and Corruption Policy in FYE 2025.

Employee Category	FYE 2023	FYE 2024	FYE 2025
Senior Management (%)	2.22	36.07	0.00
Management (%)	4.44	46.72	17.55
Executives (%)	10.56	17.21	26.06
Non-Executives (%)	0.56	0.00	17.02



Anti-Corruption Training by Employee Category (FYE2023–FYE2025)

Sustainability Statement (cont'd)

Corporate Governance and Anti-Corruption (cont'd)

OUR PERFORMANCE (cont'd)

Anti-corruption training coverage has evolved over the past three years as the Group refined its training approach. In FYE 2023, participation was limited and concentrated mainly among management and executive staff. In FYE 2024, training coverage improved within these groups, while participation among other employee categories remained limited.

In FYE 2025, the Group achieved a marked improvement in overall training coverage, with 60.64% of employees across management, executive and non-executive categories completing anti-corruption training. This progression reflects the Group's continued efforts to embed ethical awareness across operational levels while maintaining zero confirmed incidents of corruption from FYE 2023 to FYE 2025.

Looking ahead, the Group plans to further enhance training participation through targeted awareness initiatives and incentives, with the aim of achieving broader coverage across all employee categories.

Legal and Regulatory Compliance

WHY IT MATTERS

Ensuring legal compliance within our project development operations is fundamental to fostering sustainable practices. By adhering to the pertinent laws and regulations, we establish accountability in our operations and reinforce confidence in our operations.

OUR APPROACH

The Group complies with the procedural regulatory requirements under Bursa Malaysia's Main Market Listing Requirements ("MMLR"), covering areas such as work health and safety, modern slavery, and housing-related laws. We also adhere to with the Code of Ethics for Company Directors and Company Secretaries issued by the Companies Commission of Malaysia in September 2023, along with other pertinent laws and regulations.

- | | |
|---|--|
| 1. Companies Act 2016 | 7. Unclaimed Moneys Act 1965 |
| 2. Capital Markets & Services Act 2007 | 8. Employment Act 1955 |
| 3. Main Market Listing Requirements of Bursa Malaysia Securities Berhad | 9. Personal Data Protection Act 2010 |
| 4. Malaysian Code on Corporate Governance ("MCCG") | 10. Housing Development (Control and Licensing) (Amendment) Act 2012 |
| 5. Malaysian Anti-Corruption Commission Act 2009 | 11. Housing Development (Control and Licensing) (Amendment) Regulations 2015 |
| 6. Anti-Money Laundering, Anti-Terrorism Financing & Proceeds of Unlawful Activities Act 2001 | 12. Housing Development (Housing Development Account) (Amendment) Regulations 2015 |

OUR PERFORMANCE

In FYE 2025, the Group recorded zero incidents of non-compliance with applicable laws and regulations.

This demonstrates the effectiveness of the Group's compliance framework, internal controls and governance practices in managing regulatory risks and maintaining high standards of business integrity.

Sustainability Statement (cont'd)

Data Privacy and Cybersecurity

WHY IT MATTERS

Protecting stakeholder information is essential to maintaining trust, safeguarding the Group’s reputation and ensuring business continuity. Robust data privacy and cybersecurity practices help prevent unauthorised access, data breaches and cyber threats, while supporting compliance with applicable data protection regulations and reinforcing stakeholder confidence in the Group’s digital systems.

OUR APPROACH

NCT Alliance’s data privacy and cybersecurity practices are guided by the Personal Data Protection Act (“PDPA”) 2010, which governs the collection, use, and protection of personal data across the Group’s operations. The Group has implemented data management policies, key IT governance frameworks, and secure IT infrastructure to safeguard sensitive information and mitigate cybersecurity risks.

Cybersecurity is further strengthened through regular system reviews and cybersecurity audits, supported by employee training on data privacy practices and incident response protocols to enhance awareness and preparedness. Clear data protection and cybersecurity measures, together with an established security breach response procedure, provide structured and timely responses in the event of a security incident.

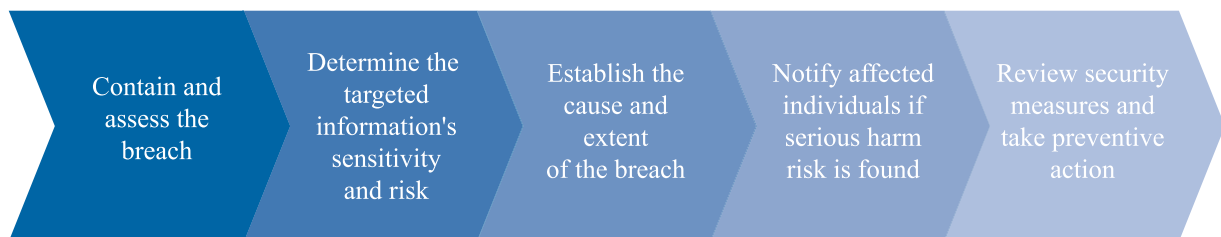
Looking ahead, the Group will continue to enhance its data privacy and cybersecurity controls through strengthened system monitoring, periodic reviews of IT governance frameworks and expanded employee awareness initiatives, in line with evolving regulatory requirements and cyber risk trends.

NCT Alliance Data Privacy Protection Measures



In the event of a security breach, our breach response procedure enables prompt resolution.

NCT Alliance Security Breach Procedure



OUR PERFORMANCE

For FYE 2025, the Group recorded zero substantiated complaints or incidents relating to breaches of customer data privacy or cybersecurity. This outcome reflects the effectiveness of the Group’s data protection measures, governance frameworks and ongoing monitoring practices.

Sustainability Statement (cont'd)

Investing With Integrity

Sustainable business practices are essential for maintaining the longevity of revenue streams and enriching stakeholder value. NCT Alliance prioritises the economic resilience of our operations and procurement practices to strengthen our growth trajectory, thereby enhancing our ability to adapt to the changing market landscape for long-term sustainability.

Material Sustainability Matters

- Economic Performance
- Supply Chain Management

Stakeholders

- Government and Regulators
- Contractors, Vendors and Suppliers
- Customers
- Employees



100%

of procurement budget spent on local suppliers

Sustainability Statement (cont'd)

Economic Performance

WHY IT MATTERS

A strong economic performance sustains revenue streams and increases stakeholder value. Through strategic prioritisation of our economic robustness, we can fortify our growth trajectory and uphold long-term business sustainability, thereby driving value generation.

OUR APPROACH

NCT Alliance prepares an annual budget that serves as a guideline for our financial decisions, ensuring efficient resource allocation and cost management. The process enhances our adaptability to changing market conditions as well as improves our financial resilience.

OUR PERFORMANCE

In FYE 2025, the Group recorded a total revenue of RM 475,609 million.

	FYE 2024	FYE 2025
Income Statement (RM)		
Economic Value Generated (Revenue)	378,436,510	475,609,511
Operating Costs	51,342,941	68,735,205
Employee Wages and Benefits	24,440,376	24,780,053
Contributions (RM)		
Economic Value Retained (Profits)	47,802,740	48,129,766
Payment to Government (Taxes)	24,564,635	31,239,922
Community Investments	690,456	237,041.33

Supply Chain Management

WHY IT MATTERS

Responsible supply chain management supports business continuity, cost efficiency and ethical business practices. Prioritising local suppliers contributes to regional economic development while enabling closer oversight of vendor performance, compliance and operational risks, including those related to sustainability and climate resilience.

OUR APPROACH

The Group established stringent assessment criteria for suppliers, evaluating their track record, previous project references and financial capacity before engagement. Our Vendor Code of Conduct (“VCC”) outlines the expected practices, and professional conduct for all vendors engaged with the Group. All relevant parties are duly informed of the VCC and required to acknowledge its principles and standards.

OUR PERFORMANCE

In FYE 2025, the Group continued to prioritise local sourcing, with 100% of procurement spend allocated to local suppliers and vendors. This approach supports the local economy while strengthening supplier engagement and supply chain reliability across the Group’s operations.