

DIGITAL BLOOM



Digital Bloom

Engineered For Growth

Malaysia's national flower, the hibiscus, teaches us a counterintuitive lesson in growth. Each bloom lasts just a single day. Yet, the plant produces flowers continuously, not despite this brief lifespan, but because of it. The hibiscus doesn't cling to yesterday's bloom; it redirects all its energy into tomorrow's.

This perpetual renewal of constant regeneration makes the hibiscus not a symbol of permanence, but of strategic transformation. In nature, the most vibrant blooms emerge after deliberate pruning, when the plant redirects resources from supporting old growth to produce new shoots. What appears to be cutting back is, in fact, preparation for more vigorous flowering ahead.

At CTOS Digital, we've learned to think like the hibiscus. We understand that transformation isn't about preserving everything; it's about channelling energy where it creates the most value.

And today, our hibiscus is truly digital.

We are not waiting for nature's timeline. We're engineering the conditions for bloom, building cloud infrastructure that acts as a controlled greenhouse, integrating AI that optimises growth conditions and creating security protocols that protect against threats no natural flower ever faced.

As we move forward, we carry both the wisdom of nature's time-tested principles and the power of modern engineering.

Welcome to our digital bloom.

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2026

ANNUAL GENERAL MEETING



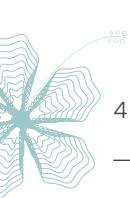
Date: 25 June 2026



Time: 9.30 a.m.



Venue: Corporate Meetings by Envivo, Ground Floor, Lobby 1, Crystal Plaza, No. 4, Jalan 51A/223, 46100 Petaling Jaya, Selangor



ABOUT THIS REPORT

Feedback



Should you have any feedback on this report, please reach out to our Investor Relations Team.

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www.ctosdigital.com

CTOS Digital Berhad’s Integrated Annual Report for 2025 presents a consolidated view of the Group’s performance, strategy, governance and sustainability considerations, reflecting how we create value over the short, medium and long term. Guided by the principles of integrated reporting, the report is designed to provide stakeholders with clear and decision-relevant insights into the fundamentals that underpin our business and our approach to sustainable growth.

SCOPE & BOUNDARIES

This Integrated Annual Report presents the financial and non-financial performance of CTOS Digital Berhad (“CTOS Digital” or “the Company”) and its subsidiaries (“CTOS” or “the Group”) for the financial year ended 31 December 2025, unless otherwise stated. The report covers the Group’s principal operations and activities within the defined reporting period and boundary.

The report provides a consolidated view of the Group’s business model, strategic priorities, performance and outlook, together with key information on governance, risk management and sustainability matters relevant to long-term value creation. Where applicable, material developments, risks and opportunities are discussed in the context of their impact on the Group’s financial position and operating environment.

Prepared with a focus on clarity, consistency and transparency, this report is intended to support stakeholders’ understanding of the Group’s performance and the foundations that underpin its approach to sustainable growth.

OUR PROCESS & DISCLOSURES

This Integrated Annual Report has been prepared using an integrated reporting approach, bringing together financial and non-financial information to provide a cohesive view of how the Group creates value over time. The report is guided by the principles of the International Integrated Reporting Council’s (IIRC) <IR> Framework (January 2021) and relevant regulatory requirements.

The content reflects matters assessed to be material to the Group’s performance, position and long-term value creation, based on established governance and management review processes, and has been reviewed and approved by the Board of Directors. Financial information is derived from the Group’s audited financial statements, while non-financial information is prepared based on internal management reporting and policies.

NAVIGATE OUR REPORT

In the report, we utilise the following icons to signify the connectivity between our business elements. Please refer to the icons for links between capitals, strategic focus areas, stakeholder groups, material matters and risks:

▶ Capitals

- Human
- Financial
- Manufactured
- Intellectual
- Natural
- Social

▶ Strategic Focus Areas

- Continuing to Grow Core Business
- Expanding International Operations
- Leveraging the Digital Ecosystem
- Harnessing Group-wide Synergies
- Strengthening Customer Lifetime Journey

MATERIALITY

This Integrated Annual Report focuses on the material matters that influence the Group’s performance, resilience and ability to create value over the long term. These matters reflect key risks, opportunities and priorities relevant to the Group’s operating environment and stakeholder expectations.

Material matters were identified through a structured materiality assessment process, obtained through stakeholder engagement, internal management review and Board oversight. The outcomes of this process guide the Group’s strategic focus, risk management and sustainability priorities. Further details on the materiality assessment process are set out on page 36.

ASSURANCE

Internal assurance is supported through the alignment of the Group’s risk, audit and compliance functions, providing oversight across the reporting process and supporting the integrity of information disclosed. Accountability and independence are maintained through the Group’s Risk Governance Structure, with clear segregation of duties across the three lines of defence.

The Group’s annual financial statements were audited by PricewaterhouseCoopers PLT, Malaysia. In addition, limited internal assurance was obtained on selected sustainability disclosures, including sustainable finance achievements and greenhouse gas emissions for Scope 1, Scope 2 and selected Scope 3 categories, in alignment with the Bursa Malaysia Sustainability Guide.

FORWARD-LOOKING STATEMENTS

This Integrated Annual Report contains forward-looking statements relating to the Group’s strategy, outlook and prospects. These statements are based on current expectations, assumptions and assessments, and involve known and unknown risks as well as uncertainties that may cause actual outcomes or results to differ materially from those expressed or implied. Forward-looking statements do not constitute guarantees of future performance and speak only as at the date of this report.

BOARD’S RESPONSIBILITY STATEMENT

The Board acknowledges its responsibility for the integrity of this report, ensuring a fair presentation of CTOS’ integrated performance and addressing material issues affecting value.

The Board confirms that this report was diligently prepared in accordance with the International <IR> Framework and received approval on 24 April 2026.

ALIGNS WITH UNSDGS

We envisage a world free of poverty, hunger, and disease, where all life can thrive. We envisage a world free of fear and violence. A world with universal literacy. A world with equitable and universal access to quality education at all levels, to health care and social protection, where physical, mental and social well-being are assured. A world where we reaffirm our commitments regarding the human right to safe drinking water, sanitation and improved hygiene, and where food is sufficient, safe, affordable and nutritious. A world where human habitats are safe, resilient and sustainable, with universal access to affordable, reliable and sustainable energy.



Material Matters

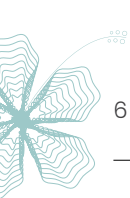
- M1** Data Privacy & Cyber Security
- M2** Product Excellence & Innovation
- M3** Customer Excellence
- M4** Financial Inclusion & Community Empowerment
- M5** Diversity, Equity & Inclusion (DEI)
- M6** Talent Development & Growth
- M7** Employee Welfare & Well-being
- M8** Governance, Integrity & Transparency
- M9** Sustainability Risk Management
- M10** Responsible Supply Chain
- M11** Climate Action & Environmental Footprint

Risk

- R1** Cyber & Technology Risk
- R2** Information & Data Risk
- R3** Regulatory Risk
- R4** Operational Risk
- R5** Human Capital Risk
- R6** Third-Party Risk
- R7** Environmental, Social & Governance (ESG) Risk

Web Refer
To find more information online via www.ctosdigital.com

Page Refer
To find more related information inside this report



OVERVIEW OF CTOS

WHO WE ARE & WHAT WE DO

Founded in 1990, CTOS is Malaysia’s leading credit reporting agency, providing data-driven insights that support responsible credit decisions across the financial ecosystem. CTOS serves a wide range of clients, including banks, financial institutions, insurers, telecommunications companies, large corporates, SMEs, legal firms and statutory bodies, while also empowering individuals through accessible credit self-check services.

Since its listing in 2021 and with more than three decades of operating experience, CTOS remains focused on strengthening its core capabilities and expanding responsibly. Guided by a long-term perspective, the Group continues to enhance its platforms, develop new verticals and deliver solutions aligned with the evolving needs of the financial ecosystem, while contributing to sustainable economic and social value creation.

VISION

TRUSTED INTELLIGENCE BEHIND EVERY TRANSACTION



STRATEGIC PILLARS



CONTINUING TO GROW CORE BUSINESS



EXPANDING INTERNATIONAL OPERATIONS



LEVERAGING THE DIGITAL ECOSYSTEM



HARNESSING GROUP WIDE SYNERGIES



STRENGTHENING CUSTOMERS LIFETIME JOURNEY

WHO WE ARE & WHAT WE DO

▶ MISSION

To enable fair, responsible and inclusive access to credit and financial services through trusted data, digital and AI-powered solutions

WHO WE ARE

#1

Credit Bureau
in Malaysia

30+

Years of Data

5M+

Consumers

600+

FI & Corporate

20K+

SMEs

Proprietary Fraud Bureau Provider

#1 e-Trade Reference Bureau Provider
in Malaysia

One CTOS Values



Customer First

We design every decision around measurable customer impact.



Trusted Intelligence

Our data and insights must be accurate, ethical and actionable.



Ownership

We take responsibility for outcomes, not activities.



Speed with Discipline

We act efficiently while protecting trust and standards.



OVERVIEW OF CTOS HISTORY & MILESTONES

1990

Founders started their credit reporting business under CTOS Sdn Bhd, which was incorporated to provide fax-based reporting services for banks in Malaysia.

2007

- CTOS Credit Manager launched.

2010

- Malaysia enacted the CRA Act.

2011

- CTOS ID launched.

2013

- CTOS Mobile Application launched.



1992

- CTOS Data Systems incorporated with the goal to better serve banks and financial institutions in Malaysia by enabling direct integration of its database with the banks' own systems.

1994

- CTOS-EMR Sdn Bhd incorporated to serve commercial companies.

2014

- CRA Act came into force. CTOS Data Systems was registered as a licenced CRA.
- iNodes, which is backed by the Creador Group, invested in the business with a 70.0% equity interest.

2015

- CTOS Data Systems first obtained access to CCRIS data.

2016

- Launched CTOS FREE Score campaign.
- Launched CTOS Consumer Score in collaboration with FICO.



OVERVIEW OF CTOS HISTORY & MILESTONES

2018

- CTOS SecureID and CAD launched.

2019

- Launched CTOS SME Score and CTOS eKYC.
- Acquired a 26.0% equity interest in Experian Malaysia.

2020

- Launched CTOS Portfolio Analytics and Insights and CTOS IDGuard.
- Acquired a 51.0% equity interest in CIBI (held by CIBI Holdings) and a 20.0% equity interest in BOL allowing CTOS Digital to provide complementary solutions to clients.

2021

- Acquired 100.0% equity interest in Basis
- Disposal of stake in CIBI & CIBI Holdings via distribution of dividend in specie.
- Acquired 8.125% in RAM.
- Acquired additional 2.65% stake to reach 22.65% in BOL.
- IPO – Bursa Malaysia Main Market Technology Sector.

2022

- Increased stake in BOL to reach 24.825%.
- Acquired 49% stake in JurisTech.
- Increased stake in RAM to reach 57.675%.
- Included in FTSE4Good Bursa Malaysia Index and FTSE4Good Bursa Malaysia Syariah Index.

2023

- Launched CTOS Application & Decisioning (“CAD”) for licenced moneylenders together with JurisTech.
- Acquired 100% equity interest in FinScore Philippines.
- Acquired 79.99% equity interest in Prime Analytics, Indonesia.
- CTOS Data Systems received MOF’s approval for a 5-year extension of tax exemption period up to 8 Nov 2026.

35
Years Of History
Since 1990

2024

- Received the ISO/IEC 27001:2022 (Information Security, Cyber Security & Privacy Protection – Information Security Management Systems) Certification, a globally recognised standard information security management.
- Marked the first full year of contribution from subsidiaries, FinScore Philippines and FinScore Indonesia.



OVERVIEW OF CTOS

2025 KEY EVENTS

FEBRUARY

MOU CTOS x Maybank Islamic 14 February

CTOS and Maybank Islamic formalised a strategic collaboration to drive financial inclusion via a Banking-as-a-Service (BaaS) framework. This partnership integrates CTOS' advanced credit analytics with Maybank Islamic's Shariah-compliant financing, offering SMEs and retail customers seamless access to personalised digital banking solutions and credit education.

2025 ASEAN Banking and Finance Summit (as partner) 24 February

Serving as an official partner, CTOS played a pivotal role at the 2025 ASEAN Banking and Finance Summit. The event gathered regional policymakers and industry leaders to discuss the "Inclusivity and Sustainability" theme of Malaysia's ASEAN Chairmanship. CTOS showcased its digital infrastructure solutions, emphasising how data-driven credit reporting facilitates cross-border trade and supports ASEAN's vision for a future-ready, digitally integrated financial ecosystem across Southeast Asia.

APRIL

MOU CTOS x MyCelik Network 14 April



CTOS partnered with MyCelik Network to launch a comprehensive financial literacy initiative specifically designed for university students. This collaboration aims to bridge the gap in financial education by providing undergraduates with early access to credit health tools and expert-led workshops.

JUNE

BIIA Conference 4-6 June



At the Business Information Industry Association (BIIA) Conference, CTOS partnered with global leaders to celebrate 20 years of the business information industry. The discussions focused on "Digital Finance in the 4th Industrial Revolution," specifically the role of AI and blockchain in credit reporting. CTOS shared insights on leveraging alternative data to expand credit access while addressing the rising threats of cybercrime and sophisticated fraud in an increasingly digitalised global economy.

Program Perdana Literasi Kewangan Peringkat IPTA/IPTS - Malaysia Department of Insolvency (MDI)

23 June

CTOS participated in the Program Perdana Literasi Kewangan Peringkat IPTA/IPTS, organised by the Malaysia Department of Insolvency (MDI). This initiative aimed to bolster financial literacy among tertiary students, providing critical insights into credit health and insolvency prevention.



OVERVIEW OF CTOS 2025 KEY EVENTS

AUGUST

MOU CTOS & BigPay

13 August

CTOS and BigPay entered a landmark partnership to democratise credit information for over 1.6 million digital wallet users. Through this integration, BigPay users can now access their CTOS credit scores directly within the app, promoting transparency and financial self-awareness.



Bursa Malaysia's Stockbroking Ecosystem Day

15 August

CTOS collaborated with Bursa Malaysia to highlight the critical role of credit data in the stockbroking industry. During Ecosystem Day, CTOS demonstrated how its credit analytics can assist brokerage firms in managing client risk and enhancing the retail investor onboarding process. This collaboration supports Bursa Malaysia's goal of creating a more resilient market environment.



MOU CTOS x GB Gold

27 August

Focusing on security in the alternative investment sector, CTOS signed an MOU with GB Gold to implement advanced eKYC and anti-fraud technology on their gold trading platform. This partnership leverages CTOS' digital identity verification solutions and Group-IB's global fraud detection tools to safeguard investors against identity theft.



SEPTEMBER

MOU CTOS Basis x Nazsoft Tech Sdn Bhd

18 September

CTOS Basis partnered with Nazsoft Tech to provide integrated credit risk data for the MATRADE MADANI Digital Trade Platform. This collaboration allows Malaysian exporters to perform real-time credit checks on international buyers, significantly reducing the risks associated with global trade.





OVERVIEW OF CTOS

2025 KEY EVENTS

OCTOBER

MOU CTOS X MYDIGITAL ID

10 October

In a milestone for national digital infrastructure, CTOS became the first credit reporting agency to integrate with MyDigital ID. This partnership enhances CTOS' electronic Know Your Customer (eKYC) processes by utilising the government-backed national identity platform. The integration streamlines the user onboarding process, bolsters security against synthetic identity fraud and simplifies digital interactions for millions of Malaysians.



MOU CTOS Basis x HDC

14 October

CTOS Basis and the Halal Development Corporation (HDC) signed an MOU to strengthen the financial transparency of the global halal ecosystem. This collaboration provides halal-certified companies with access to detailed credit reports and financial health insights, helping them establish better creditworthiness for international trade and financing.

3rd Annual Anti-Fraud Leader Summit 2025

16 October

CTOS served as a panellist at the 3rd Annual Anti-Fraud Leader Summit, addressing the theme of "Future-Proofing Against Fraud." With AI-generated scams like deepfakes and synthetic identities on the rise, CTOS presented its latest AI-driven biometric and verification solutions. The summit provided a platform for CTOS to engage with regulators and law enforcement.

CTOS x AIBIM IDGuard Fraud Event

30 October

CTOS and the Association of Islamic Banking and Financial Institutions Malaysia (AIBIM) hosted a specialised fraud awareness event focusing on the Islamic banking sector. The event highlighted the successes of the CTOS IDGuard consortium in detecting suspicious loan applications through real-time automated alerts. The partnership has effectively mitigated millions in potential losses, reinforcing the integrity of the Shariah-compliant financial system.



NOVEMBER

Press Conference : Alliance Bank | CTOS | JurisTech

6 November



A joint press conference was held to announce a breakthrough in digital lending: an AI-enabled Retail Loan Origination System (RLOS). Developed by Alliance Bank in partnership with CTOS and JurisTech, this system has reduced loan processing times from seven days to just one day.

OVERVIEW OF CTOS 2025 KEY EVENTS

NOVEMBER

CTOS IDGuard Consortium Annual Workshop

The annual IDGuard workshop convened major financial institutions to refine Malaysia's collective defence against financial crime. As the operator of Southeast Asia's first fraud bureau, CTOS facilitated discussions on emerging mortgage and personal loan fraud trends. The workshop focused on enhancing the IDGuard engine's detection capabilities, ensuring that all member banks remain equipped with the most advanced, shared data insights to stay ahead of increasingly complex fraud syndicates.

CTOS SME Biz Day

CTOS SME Biz Day 2025, which began in May until August, travelled to major economic hubs, empowering over 1,000 SMEs with the tools needed for digital transformation. These events provided entrepreneurs with exclusive access to credit management software, e-invoicing workshops and networking opportunities. By bringing experts directly to the local business communities in KL, Penang, Johor and Kuching.



CTOS SME 2025 Symposium

From September to November, the 2025 Symposium series focused on building regional business resilience across Melaka, Kuantan, Kota Kinabalu and Butterworth. The sessions provided deep dives into risk management and the importance of maintaining a healthy company credit profile. By offering data-driven insights tailored to regional markets, CTOS enabled local business owners to better navigate economic shifts and leverage credit data as a strategic asset for sustainable growth and expansion.

Program Rancakkan MADANI Bersama Malaysiaku

CTOS concluded the year with a significant presence at the Program Rancakkan MADANI Bersama Malaysiaku in Putrajaya, which was attended by over 500,000 visitors. By facilitating individual credit health checking, CTOS demonstrated its role as a vital infrastructure partner in the Malaysia MADANI ecosystem, supporting transparent governance and inclusive economic growth.



CTOS Gencilik: Financial Wizard Programme

The CTOS Gencilik: Financial Wizard Programme, which started from May to October, engaged university students at UPM, UCMI, UM, Taylor's University and INTI through a high-energy campus roadshow. The programme focused on practical financial empowerment, teaching students how to read credit reports and understand the long-term impact of their financial decisions. By educating thousands of students before they enter the workforce, CTOS is actively contributing to the nation's goal of improving financial literacy and reducing youth bankruptcy.

Program MADANI Rakyat

CTOS actively participated in the Program MADANI Rakyat 2025 roadshow, which kicked off in Tawau, Sabah and spanned various regions including Johor, Terengganu and Perak. As a key partner in the digital and financial literacy zone, CTOS provided on-ground support to thousands of citizens, offering free credit health checks and consultations.



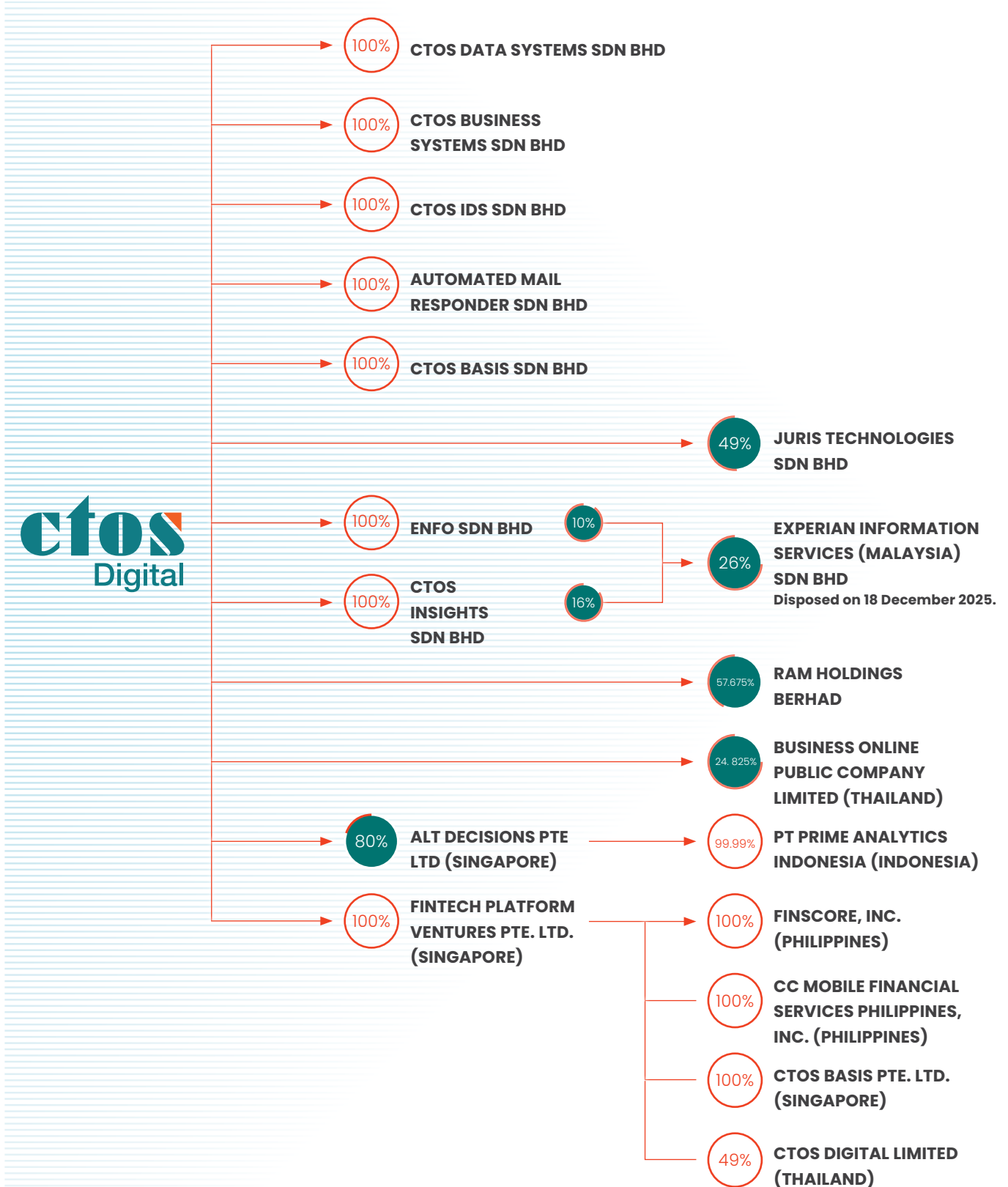


OVERVIEW OF CTOS

HOW WE ARE STRUCTURED

CTOS Digital is a holding company with interests in some of ASEAN's leading credit reporting agencies.

In serving our mission, we offer a comprehensive range of products and services through four business pillars, supported by shared corporate functions.



OVERVIEW OF CTOS

HOW WE ARE STRUCTURED

▶ OUR ASSOCIATE COMPANIES

Aligned with our growth strategy, the Group’s strategic investments in selected associate companies position us to capitalise on emerging opportunities within the rapidly evolving digital economy.



24.825%

Thailand, BOL is a key player that offers business decision-making solutions, offering online platforms for risk management, business intelligence platforms and data solutions.



49%

A Malaysian-based fintech firm specialising in end-to-end credit software solutions for enterprises.



57.675%





A leading provider of credit ratings, research, ESG analytics and bond pricing.



26%

A licenced credit reporting agency that provides consumer and commercial credit information, analytics and risk management solutions to financial institutions and businesses in Malaysia. Disposed on 18 December 2025.

▶ BUSINESS PILLARS

	Customers served	Top contributors	Services provided
 KEY ACCOUNTS (MALAYSIA)	<ul style="list-style-type: none"> > 600 customers 	<ul style="list-style-type: none"> Banks, Non-bank Financial Institutions (NBFIs) and telcos 	<ul style="list-style-type: none"> Credit reports, analytics, identity and fraud solutions
 COMMERCIAL	<ul style="list-style-type: none"> > 20,000 customers 	<ul style="list-style-type: none"> SMEs, legal firms and motorcycle dealers 	<ul style="list-style-type: none"> Credit reports, Credit Manager
 DIRECT-2-CONSUMER	<ul style="list-style-type: none"> > 5 million registered users 	<ul style="list-style-type: none"> Consumer 	<ul style="list-style-type: none"> Analytics (score reports)
 KEY ACCOUNTS (INTERNATIONAL)	<ul style="list-style-type: none"> > 80 customers 	<ul style="list-style-type: none"> Microfinance Institutions (MFIs), Fintechs and banks 	<ul style="list-style-type: none"> Telco score

▶ DELIVERED VALUE ACROSS ASEAN

Extensive Financial Institutions and Corporates Footprint

Served over 600 corporate customers and strategic partners, reinforcing a strong data and risk ecosystem.

Strong Consumer Data Coverage

Managed credit insights on more than 5 million unique individuals across Malaysia, forming one of the country’s most comprehensive consumer data repositories.

Tangible Fraud Prevention Impact

Delivered measurable financial protection in 2025 through CTOS IDGuard, safeguarding RM276.5 million in potential losses for participating institutions.

▶ GROUP CORPORATE FUNCTIONS

- FINANCE | STRATEGY | TECHNOLOGY | OPERATIONS | COMPLIANCE | LEGAL | RISK
 HUMAN RESOURCES | INTERNAL AUDIT | CORPORATE SECRETARIAL | SUSTAINABILITY



OVERVIEW OF CTOS

WHAT WE OFFER

▶ DATA & INFORMATION**Enquiry/Business Repots**

Comprehensive credit assessment reports that consolidate an individual's or business's credit exposure, repayment history, trade references and key risk indicators into a structured, decision-ready profile. Beyond supporting lenders in prudent credit evaluation and limit setting, the reports enhance transparency and trust among business partners by strengthening credibility and enabling more confident onboarding, contract negotiations and long-term commercial relationships.

CCRIS

The Bank Negara Malaysia Central Credit Reference Information System (CCRIS) is a centralised credit reporting system that aggregates borrower credit information submitted by financial institutions in Malaysia. It is designed to support prudent credit risk management within the banking system by enabling lenders to assess an individual's or business's overall credit exposure and repayment behaviour.

SSM

SSM data refers to official corporate and business registration information maintained by Companies Commission of Malaysia (SSM), the statutory body responsible for regulating and registering businesses and companies in Malaysia under legislation such as the Companies Act 2016, Business Registration Act 1956, and Limited Liability Partnerships Act 2012. SSM data provides legal and structural information about registered entities, enabling stakeholders such as banks, regulators, and business partners to verify a company's legitimacy, ownership structure, and corporate standing.

UBO & Global UBO

An Ultimate Beneficial Owner (UBO) is a report for identifying and verifying the natural person(s) who ultimately own, control, or benefit from a company or legal entity, even if ownership is held indirectly through multiple layers of companies or nominees. In Malaysia, this concept is reinforced under regulatory frameworks issued by SSM and anti-money laundering requirements overseen by Bank Negara Malaysia. Global UBO report is similar nature but applicable for international business entities.

International Reports

Enquire about a foreign company based on information that is readily available in the global databank via CTOS BASIS. In some cases where the report requested cannot be fulfilled through CTOS BASIS, it will be sourced from our other networks.

CTOS KYC

CTOS KYC (Know Your Customer) Screening is a world-class customer identification and verification solution that gives you the clarity and transparency you need to protect your organisation from various risks. This is in partnership with LexisNexis Risk Solutions, part of Reed Elsevier, a leading publisher and information provider for 100% of the Top 50 US Banks and 80% of Fortune 500 Companies. There are four main risk categories in our KYC Screening:

1. Sanction List
2. Political Exposed Person
3. Adverse Media (related to illicit activities, such as money laundering, fraud, drug trafficking, terrorism and corruption.)
4. Enforcement (money laundering and fraud)

OVERVIEW OF CTOS WHAT WE OFFER

Electronic Trade Reference (eTR)

A platform that enables non-banking industry participants to share information on delinquent customers, supporting effective credit risk mitigation and promoting responsible payment behaviour.

CTOS ID Guard

A proactive fraud detection and prevention solution to strengthen credit monitoring, facilitate timely investigation of suspicious activities and safeguard consumers against identity-related risks.

▶ DIGITAL SOLUTIONS

CTOS Application & Decisioning (CAD) / CAD ML

A web-based solution that enables users to make efficient and accurate credit decisions through automated analytics and comprehensive data insights. CAD targets enterprise customer base while CAD ML is customised for Money Lender market segment.

Monitoring

A subscription-based service that alerts users when there are changes to the subject monitored with respect to their banking credit activities such as new credit application, missed payment, credit limit changes, SSM profiles or if anyone submits any trade reference or legal cases on them.

CTOS Credit Finder

A platform (website) that helps users discover and compare suitable credit products/services such as credit cards, personal loan and financial consultancy services. This is a solution specific to Consumer market segment.

Credit Manager

A digital portal that enables subscribers to effectively assess and manage credit risk through three core services: Evaluate, Monitor and Reinforce (good payment behaviour).

Multiface ID

CTOS Multi FaceID is an extension service to CTOS Identity Verification. On top of Liveness Detection and Facial Comparison against ID document, CTOS Multi FaceID use face photos as input to match against face databases for fraud prevention.

Compliance Risk Management

CTOS provides Client Lifecycle Management (CLM) software for financial institutions, which automates and orchestrates complex compliance processes, from initial client onboarding to continuous compliance checks, ensuring regulatory adherence and improving operational efficiency.

eKYC

Facilitates secure remote customer onboarding through digital identity verification, ensuring regulatory compliance and enhanced fraud prevention.



OVERVIEW OF CTOS

WHAT WE OFFER

▶ ANALYTICS & INTELLIGENCE

CTOS Score

A proprietary credit scoring model designed to evaluate the creditworthiness and repayment reliability of individuals and businesses. The score supports data-driven lending decisions and facilitates greater access to credit.

CTOS Secure ID

A subscription-based service offering identity theft protection through dark web monitoring, credit monitoring, takaful coverage and MyCTOS Score Report. This is a solution specific to Consumer market segment.

CCRIS Trigger

CCRIS Trigger utilises CCRIS data to deliver early warning signals and risk triggers for banks to manage collections on existing customers. The service enables real-time risk monitoring, allowing banks to proactively mitigate portfolio issues and reduce credit losses.

Customer Portfolio Insight / Scrub / Benchmarking

Facilitates the evaluation of portfolio composition and performance through market analysis, balance growth assessment, retail loan benchmarking and risk mitigation insights.

Alternative Score

Alternative Score is derived from bespoke scoring model that includes data points defined by customer. This is a special consultancy service that CTOS offers to customers that are interested to have their own internal score.

Affordability Insight / Income Prediction

Reflects the data subject's ability to make repayments at the point when a credit assessment / CTOS Report enquiry is requested. It does not indicate the actual income of the individual.

Digital Footprint

CTOS Digital Footprint Solution harnesses real-time social media information, contact information and email information of data subject as additional information for risk management.

OVERVIEW OF CTOS INVESTMENT CASE

Market Leadership & Trusted Brand

- Malaysia's leading credit reporting agency with over 30 years of operating track record.
- Deep institutional trust across financial institutions, corporates, regulators and consumers, reinforcing defensible market positioning.

Resilient Structural Demand

- Structural demand for credit assessment, eKYC, fraud mitigation and regulatory compliance.
- Structural growth driven by financial inclusion, digital banking expansion and rising risk management requirements.

Innovation-Led Diversification

- Expanding beyond traditional credit reporting into digital identity, compliance, analytics and fraud solutions.
- A strong innovation pipeline capturing emerging digital economy opportunities.

Strong Financial Discipline & Proven Growth

- Demonstrated sustainable revenue and earnings expansion.
- Asset-light and cash-generative business model supporting reinvestment and shareholder value creation.

Purpose-Driven & ESG-Aligned

- Advancing financial inclusion and empowering responsible credit access.
- Strong ESG credentials including FTSE4Good rating of 4.2, achieving 4-Star status and recognition by MSWG-NACGSA including Top 50 and Industry Excellence (Technology).

Scalable Regional Platform

- Strategic partnerships and acquisitions strengthening footprint across ASEAN.
- Replicable technology-driven model positioned for regional scale and cross-border growth.





OVERVIEW OF CTOS HIGHLIGHTS 2025

Financial Highlights

RM326.1M

Group Revenue

RM104.9M

PATAMI

17.2%

ROE

RM136.1M

EBITDA

RM88.1M

Normalised PATAMI

Business Highlights



KEY ACCOUNTS (MALAYSIA)

- Revenue contributions: 35.9%
- Attained 5.1% growth Y-o-Y.
- Over 600 Financial Institutions and Corporates.



COMMERCIAL

- Revenue contributions: 38.4%
- Over 20,000 SME base reached.



DIRECT-2-CONSUMER

- Revenue contributions: 11.6%
- Over 5 million user base reached.
- Recorded an exponential Y-o-Y growth of 42.8%.



KEY ACCOUNTS (INTERNATIONAL)

- Revenue contributions: 14.1%
- 100% telco coverage in the Philippines.
- Achieved 17.5% Y-o-Y.

Digital & Customer Experience Highlights

AI adoption to accelerate processes via automation, which increases productivity.



Implementing Cloud Migration to enhance our infrastructure.

Infrastructure modernisation to ensure seamless business and customer experiences.

Sustainability Highlights

FTSE4Good score of 4.2, achieving a 4-Star rating.

~37,000 individuals engaged in outreach events.



MSWG-NACGSA Awards:

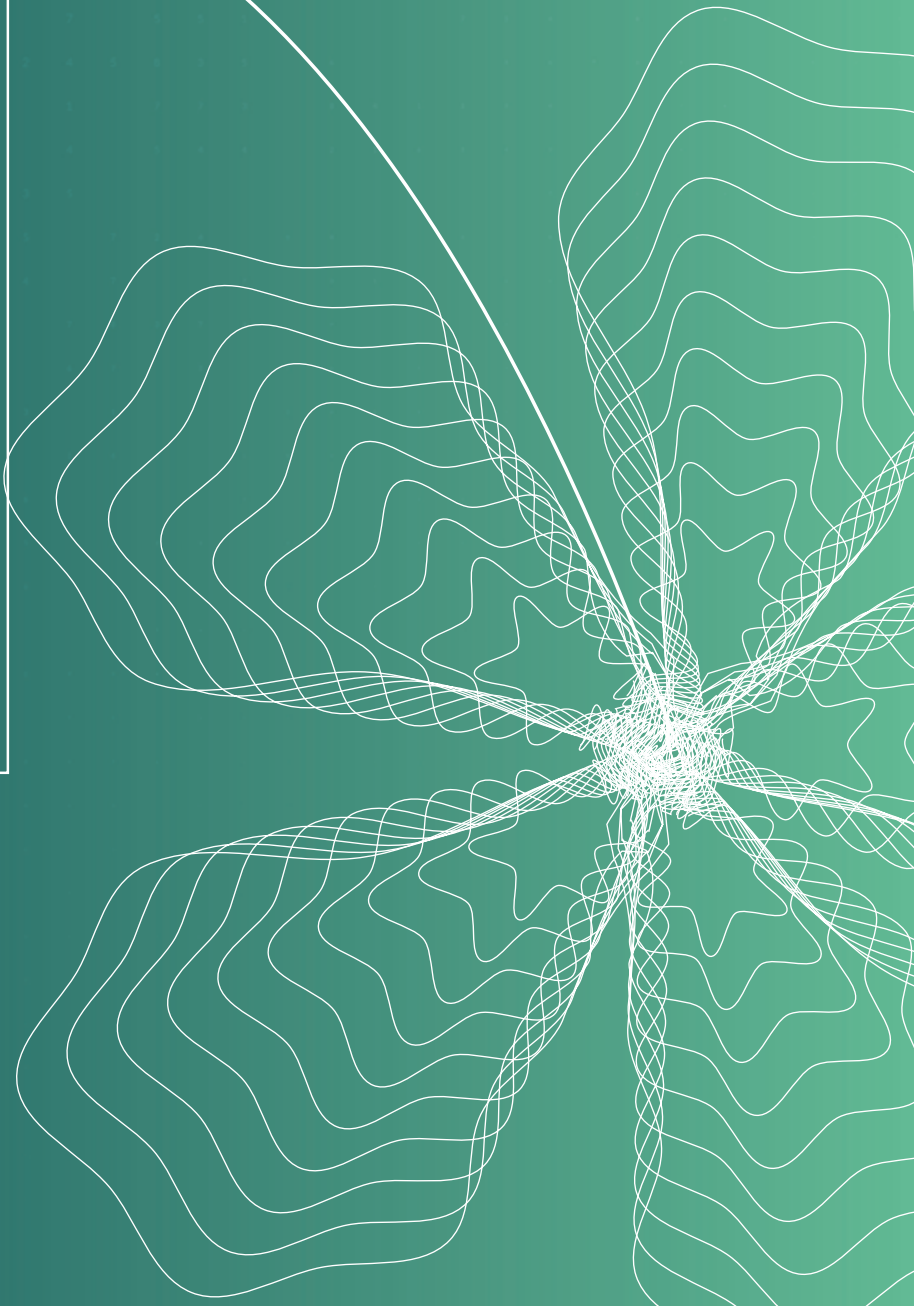
- Top 50 Recognition.
- Industry Excellence (Technology).

SECTION 3

MESSAGE FROM OUR CHAIRMAN

Chairman's Message

022





MESSAGE FROM CHAIRMAN



Dear Valued Stakeholders,

2025 has been a year of transformation and strategic repositioning for CTOS Digital. While navigating a complex operating environment, we executed critical organisational changes, strengthened our core businesses and made decisive moves to sharpen our focus on high-growth opportunities. The strategic decisions we made this year position us to accelerate growth and deliver enhanced value to all our stakeholders.

Dato' Noorazman Bin Abd Aziz

Independent Non-Executive Chairman
CTOS Digital Berhad

DELIVERING GROWTH AMID TRANSFORMATION

The Malaysian economy continued its resilient trajectory in 2025, providing a stable foundation for our operations. Against this backdrop, CTOS Digital achieved revenue of RM326.1 million, representing 7% year-on-year growth. This performance reflects the strength of our diversified business model and the sustained demand for our credit reporting and digital financial solutions across Malaysia and the region.

Our Direct-to-Consumer business demonstrated exceptional momentum with 42.8% year-on-year growth, ending the year with over 5 million registered users. Our International operations, across the Philippines and Indonesia, grew 17.5% year-on-year in early 2025, with

complete telco coverage in Indonesia. Meanwhile, our Key Accounts segment successfully onboarded digital banks and expanded into new use cases, while our Commercial segment strengthened its position in serving over 22,000 customers across diverse industries.

This year also saw us complete the disposal of our stake in Experian Information Services (Malaysia) in December 2025. This strategic divestment, which generated a gain of RM17.9 million, reflects our commitment to portfolio optimisation and allows us to reallocate capital toward our core businesses and priority growth initiatives where we can create the most value.

MESSAGE FROM CHAIRMAN

STRENGTHENING FOUNDATIONS THROUGH STRATEGIC CHANGE

Recognising the need to enhance operational efficiency while maintaining our growth trajectory, we undertook comprehensive cost rationalisation initiatives in 2025. These included right-sizing exercises designed to align our resources with strategic priorities. While these one-off costs impacted our profitability in the near term, they were necessary steps to build a leaner, more agile organisation capable of capitalising on the significant opportunities ahead.

Our normalised profit after tax and minority interest for 2025 was RM88.1 million. Though lower than the previous year due to transformation-related costs and strategic investments, this result demonstrates the underlying strength of our business model and sets a solid foundation for renewed growth momentum.

ACCELERATING TECHNOLOGY & PRODUCT INNOVATION

Innovation remains central to our competitive advantage. Throughout 2025, we launched new products across fraud detection, income validation and credit analytics, directly addressing evolving market needs. We secured fraud solution contracts with three financial institutions, with implementations progressing according to plan. Our analytics solutions gained traction across five major financial institutions, while we achieved first-time adoption of alternative scoring capabilities among key clients.

Critically, we accelerated our cloud migration initiative in the fourth quarter, modernising our infrastructure to improve scalability, resilience and cost efficiency. We also expanded our adoption of artificial intelligence, integrating AI capabilities into key workflows and automating manual processes. These technology investments enhance our ability to deliver sophisticated, real-time solutions to clients while improving our operational productivity.

BUILDING CAPABILITY & STRENGTHENING LEADERSHIP

Our people remain our greatest asset. Throughout 2025, we continued investing in upskilling and reskilling initiatives to equip our workforce with the competencies required in an AI-driven digital economy. We expanded our business development capabilities to capture opportunities we have identified, positioning ourselves to increase both new client acquisition and average revenue per user from existing relationships.

This year also marked important leadership transitions. In October 2025, we appointed a new Group Chief Risk and Compliance Officer and Group Chief Financial Officer, strengthening our financial stewardship, strategic and risk planning capabilities. Following the departure of our Group Chief Executive Officer Erick Hamburger, Kevin Loh Kok Leong served as Interim GCEO from May 2025, providing steady leadership during this transition period. In January 2026, we appointed Ankur Sehgal as the permanent Group CEO, completing this critical leadership renewal. Throughout these changes, our management team remained fully aligned and committed to executing our strategic priorities, ensuring business continuity and sustained momentum.

EXPANDING OUR REGIONAL FOOTPRINT

Our ambition to become the leading provider of credit and digital solutions across ASEAN progressed steadily in 2025. In the Philippines, we secured significant contracts for new use cases and achieved 100% telco coverage through multiple client implementations. In Indonesia, we focused on accelerating client go-lives and driving adoption of our higher-margin proprietary products. Across both markets, we began venturing into new industries, diversifying our revenue base and reducing concentration risk.

The Philippines and Indonesia represent substantial long-term growth opportunities. Our alternative data platform, which enables financial institutions to serve underbanked and unbanked populations, continues bridging financial inclusion gaps while generating attractive returns for our business.



Throughout 2025, we continued investing in upskilling and reskilling initiatives to equip our workforce with the competencies required in an AI-driven digital economy.





MESSAGE FROM CHAIRMAN

SUSTAINING ESG COMMITMENTS

Our sustainability journey advanced in 2025. We achieved a FTSE4Good score of 4.2, an increase from 3.4 in 2024, earning a 4-star rating that recognises our progress across environmental, social and governance dimensions. This achievement reflects our commitment to the four sustainability pillars that guide our approach: empowering progress and resilience, driving environmental responsibility, nurturing employee growth and acting with integrity.

Our environmental initiatives gained momentum with accelerated cloud migration, which reduces our carbon footprint through more efficient infrastructure utilisation. We began early adoption of IFRS S2 Climate Disclosures, positioning ourselves ahead of regulatory requirements and demonstrating leadership in sustainability reporting. We expanded our financial literacy programmes, reaching broader audiences through partnerships with educational institutions and community organisations. Our website continues offering multilingual content in Bahasa Melayu, English and Mandarin, ensuring accessibility across Malaysia's diverse population. For small and medium enterprises, we provided tailored solutions and advanced cash flow management tools through 26 SME-focused events, supporting approximately 2,000 businesses throughout the year.

ENHANCING CORPORATE GOVERNANCE

Strong governance underpins everything we do. In 2025, we implemented a significant structural enhancement by separating the Audit and Risk Committee into two distinct bodies, the Audit Committee and the Risk and Compliance Committee. This strategic move strengthens our oversight of financial integrity, regulatory compliance and risk management, ensuring that each critical function receives dedicated attention and expertise.

Our Board maintained its composition of 50% women directors, sustaining our commitment to balanced representation and inclusive decision-making at the highest level. The Board continues operating according to the highest standards set out in the Bursa Malaysia Securities Berhad Main Market Listing Requirements, the Malaysian Code on Corporate Governance 2021 and global best practices.



We achieved a FTSE4Good score of 4.2, earning a 4-star rating that recognises our progress across environmental, social and governance dimensions.



DELIVERING VALUE TO SHAREHOLDERS

We remain committed to rewarding shareholders while investing in growth. In 2024, following a comprehensive assessment of our capital requirements and future growth strategies, we maintained our minimum dividend payout ratio of 60%-70%, distributing RM61.7 million in dividends despite the strategic investments and transformation costs we incurred.

This balanced approach reflects our confidence in the business and our ability to generate sustainable cash flows while funding the growth initiatives that will drive long-term value creation. As we emerge from our transformation phase, we expect to deliver improved profitability that will support both attractive shareholder returns and continued strategic investment.

Our associate companies contributed RM36.3 million in 2025, representing 18.54% year-on-year growth. JurisTech, our enterprise software solutions partner, delivered particularly strong performance driven by solid project conversion and expanding regional opportunities. RAM Holdings, our bond ratings partner, progressed its building disposal as planned and expanded its sustainability rating and consulting services. These investments continue generating valuable returns while providing strategic adjacencies to our core business.

MESSAGE FROM CHAIRMAN



CHARTING OUR PATH FORWARD

Looking ahead to 2026 and beyond, we see substantial opportunities to accelerate growth building on the foundations we strengthened in 2025.

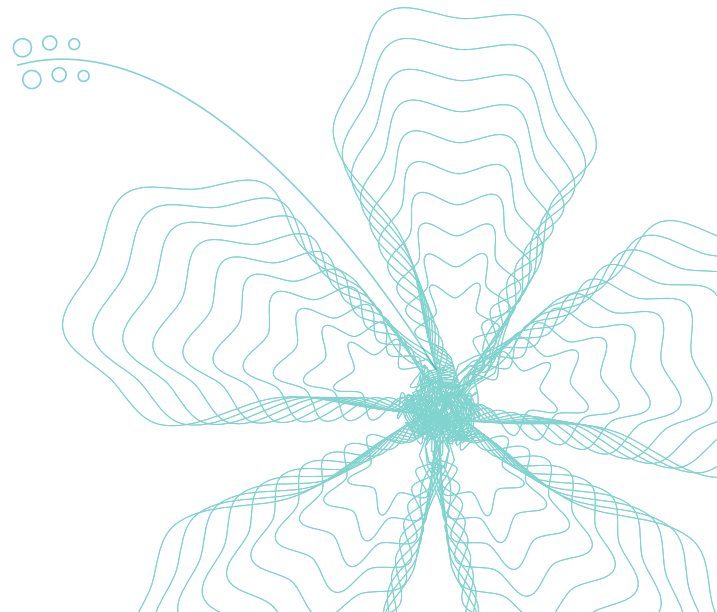
In our Key Accounts (Malaysia and International) segment, we will focus on growing our corporate client base with compliance solutions, pushing new products in fraud detection and income validation, and expanding digital solutions adoption among digital banks and non-bank financial institutions.



Underpinning all these initiatives will be continued investment in automation and productivity improvements, infrastructure modernisation, application development, and expanded use of artificial intelligence across our operations.”

Our Commercial segment will continue customer acquisition while increasing average revenue per user through enhanced monitoring and recovery features. The Direct-to-Consumer business will launch a refreshed mobile application and website, forge new partnerships, and introduce additional products to serve our growing user base. Internationally, we will drive customer acquisition, cross-sell additional telco products, and launch new offerings.

Underpinning all these initiatives will be continued investment in automation and productivity improvements, infrastructure modernisation, application development and expanded use of artificial intelligence across our operations.





MESSAGE FROM CHAIRMAN



To the entire CTOS Digital management team and our employees, thank you for your dedication, resilience and professionalism throughout a year of significant change. ”

ACKNOWLEDGEMENTS

2025 marked the departure of Erick Hamburger, our Group Chief Executive Officer. On behalf of the Board of Directors, I thank Erick for his leadership and contributions to the company over his tenure. We wish him every success in his future endeavours.

I extend my profound gratitude to Kevin Loh Kok Leong, who served as Interim GCEO during our transition period and welcome our new Group CEO Ankur Sehgal, whose appointment in January 2026 positions us strongly for the next phase of growth. To the entire CTOS Digital management team and our employees, thank you for your dedication, resilience and professionalism throughout a year of significant change. Your commitment to our clients and to excellence has been exemplary.

To my fellow Board members, your insights, challenge and guidance have been invaluable as we navigated strategic decisions and organisational transformation. Your governance and oversight ensure we maintain the highest standards of integrity and accountability.

As we move forward, we do so with confidence in our strategy, our people and our market position. The transformation we undertook in 2025 was necessary to build a stronger, more focused organisation. We are now positioned to deliver accelerated growth, expand our regional footprint and create sustainable value for all our stakeholders. Together, we will build a future defined by innovation, operational excellence and shared prosperity.

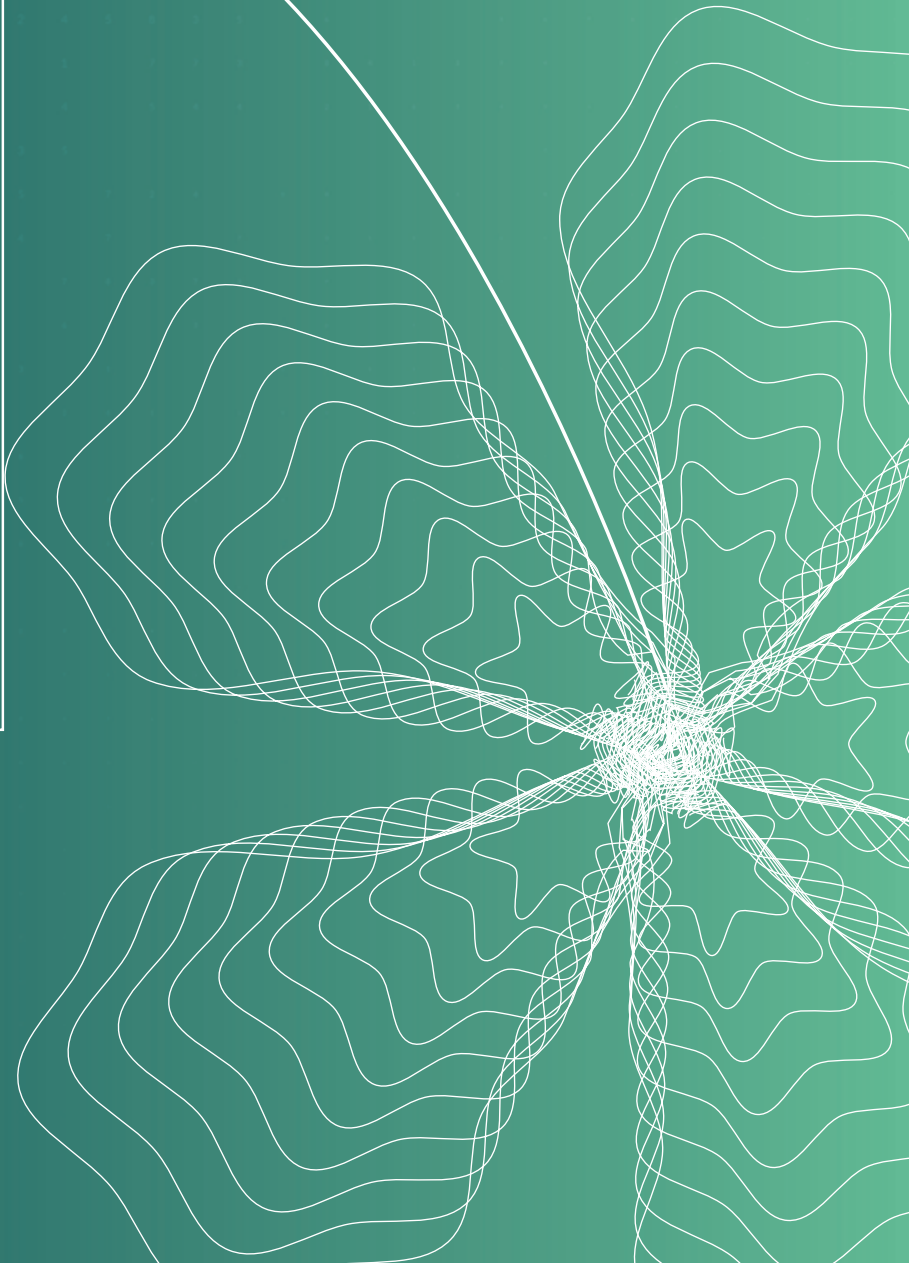
Dato' Noorazman Bin Abd Aziz

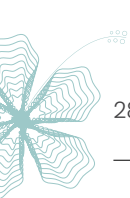
Independent Non-Executive Chairman
CTOS Digital Berhad

SECTION 4

VALUE CREATION AT CTOS

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VALUE CREATION AT CTOS

VALUE CREATION BUSINESS MODEL

Driving Sustainable Growth for a Better Financial Future

We harness resource efficiency... to drive our business...

CAPITAL INPUTS

Human

Employees are our most valuable asset and the foundation of our success. We prioritise their well-being and professional growth while fostering a high-performance culture grounded in strong governance and ethics.

- 519 total employees
- >RM400,000 invested in learning and development programmes
- 12 employee engagement initiatives

Financial

We drive growth across markets, technology and talent while maintaining strong cash flow to sustain operations, seize new opportunities and elevate customer value by leveraging diversified funding sources.

- RM822.1 million of Total Assets
- RM606.7 million of Shareholders' Equity
- RM60.3 million of Cash and Bank Balances

Manufactured

Our physical and digital assets, including offices and digital infrastructure, drive operational efficiency, advance digital financial inclusion and create long-term value while supporting consumers' financial well-being.

- 4 Service Centres Nationwide

Intellectual

Our R&D capabilities and proprietary expertise drive innovation, capitalising on advanced technologies to anticipate customer needs, expand our product portfolio and strengthen our regional competitive advantage.

- RM18.2 million invested in IT/Tech

Social

We build trusted partnerships with stakeholders, including local communities and civil society to advance digital inclusion. These relationships strengthen community engagement, deepen customer loyalty and reinforce our brand equity.

- >5 million total consumers (self-check users)
- 84.9% local suppliers engaged
- 111 outreach activities
- >RM330,000 was invested in socio-economic activities, including in financial literacy programmes nationwide

Natural

We embed sustainable practices across our operations to reduce environmental impact, safeguard natural resources and support the long-term well-being of people and the planet.

- <343.4 MWh of total electricity usage
- 249 tCO₂e Scope 2 emissions

STRATEGIC OBJECTIVES

We optimise our environmental and stakeholder impact while upholding strong governance across all operations. By focusing on material priorities and rigorously measuring outcomes, we drive continuous improvement and long-term value creation.

KEY RISKS

- R1 Cyber & Technology Risk
- R2 Information & Data Risk
- R3 Regulatory Risk
- R4 Operational Risk
- R5 Human Capital Risk
- R6 Third-Party Risk
- R7 Environmental, Social & Governance (ESG) Risk

STRATEGIC FOCUS AREAS

- Intelligence Leadership
- Credit Ecosystem & Expansion
- Digital Experience & Infrastructure

MATERIAL MATTERS

- M1 Data Privacy & Cyber Security
- M2 Product Excellence & Innovation
- M3 Customer Excellence
- M4 Financial Inclusion & Community Empowerment
- M5 Diversity, Equity & Inclusion (DEI)
- M6 Talent Development & Growth
- M7 Employee Welfare & Well-being
- M8 Governance, Integrity & Transparency
- M9 Sustainability Risk Management
- M10 Responsible Supply Chain
- M11 Climate Action & Environmental Footprint



VALUE CREATION AT CTOS

VALUE CREATION BUSINESS MODEL

... to deliver meaningful values.



CAPITAL OUTPUTS



- 60.7% employees' participation in trainings
- 73.4% employee retention rate

Employees



- RM326.1million of revenue
- 17.2% Return-on-Equity ("ROE")
- 70.1% payout ratio

Shareholders & Investors



- 8,762 walk-in customers assisted

Shareholders & Investors
Customers



- 2.7 million average monthly visitors to the Knowledge Base site
- 5 million self-check users

Shareholders & Investors
Regulatory & Government Bodies
Customers



- 15.1 consumer Net Promoter Score (NPS) scoring
- 36,869 individuals engaged in outreach events

Shareholders & Investors
Communities



- Reduced Scope 2 GHG emission by 39%

Shareholders & Investors
Communities

TRADE OFFS



Human

Investing in talent development drives innovation and service excellence while requiring disciplined capital allocation that constrains short-term profitability.



Financial

Funding technology and strategic growth strengthens long-term value while moderating short-term shareholder returns.



Manufactured

Enhancing digital infrastructure elevates operational efficiency and customer experience while requiring significant upfront investment that constrains short-term liquidity.



Intellectual

Driving fintech innovation and advanced data solutions sharpens competitive advantage while demanding substantial R&D investment that defers near-term returns.



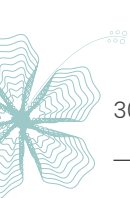
Social

Widening financial inclusion and deepening stakeholder engagement strengthens trust and broadens market reach while compressing short-term revenue margins



Natural

Decarbonisation initiatives reduce environmental effect and mitigate regulatory risk while requiring sustained capital commitments that constrain near-term profitability.



VALUE CREATION AT CTOS STAKEHOLDER ENGAGEMENT

Proactive stakeholder engagement safeguards our priorities and reinforces organisational stability. Continuous dialogue sharpens our insights, enabling us to address critical concerns and deliver measurable value to both the business and our stakeholders.

Frequency of Engagement

 Weekly	 Monthly	 Every 2 Months	 Quarterly	 Bi-Annually	 Annually	 As Required	 Daily	 Ongoing
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EMPLOYEES



Why We Engage

We engage our employees as they are central to driving innovations, strengthening customer trust and delivering secure, data-driven solutions that support our leadership in the digital economy.

Channel & Frequency of Engagement

-  Leadership Dialogues (GCEO Connect)
-  Townhalls
-  Ombudsman (Tell HR & Ideas@CTOS)

Key Concerns Raised

- Process inefficiencies impacting productivity and cross-functional collaboration.
- Workplace facilities and office environment improvements.
- Open and transparent communication on organisational purpose and strategy.

Our Response

Launched automation and process improvement initiatives to enhance operational efficiency and reduce workflow bottlenecks.

Transitioned to a new office premise for increased space per employee, improved comfort with collaboration spaces and facilities for wellness, learning and engagement.

Increased leadership dialogue to listen to employee sentiments, inform employees on business direction and strategy as well as to solicit ideas for innovation.

Value Created for Employees

- Improved workflow efficiency through automation, reducing manual workload and operational friction.
- Enhanced workplace comfort and collaboration within a modern office environment.
- Access to leadership, transparent communications, increased trust and stronger organisational alignment.

Value Created for CTOS Digital

- Increased operational efficiency and productivity through process optimisation.
- Strengthened employee engagement and morale, supporting retention and performance.
- Improved communication flow between leadership and employees, driving clearer strategic alignment and execution.

Map to Material Matters:

Risks:

VALUE CREATION AT CTOS
STAKEHOLDER ENGAGEMENT

Frequency of Engagement



CUSTOMERS



Why We Engage

We engage customers to elevate their experience, anticipate evolving needs and deliver personalised solutions that build trust, strengthen our brand and drive sustainable growth. By turning insights into action, we refine our offerings and create long-term value.

Channel & Frequency of Engagement

- D** **M** **Q** Checkpoint calls/face-to-face appointments
- D** Multi-channel touchpoints
- D** Customer Onboarding
- D** Regular meetings and day-to-day interactions
- BA** Net Promoter Score Survey
- O** Service Level Agreements (SLAs) Management response
- M** Product and Solution Training

Key Concerns Raised

- ESG transparency in credit assessments.
- Fair access to financial services.
- Imperative standards of data security and privacy.

Our Response

- Deployed advanced data security controls with real-time monitoring to safeguard systems and data.
- Achieved ISO/IEC 27001:2022 certification for Information Security Management Systems (ISMS).

Value Created for Customers

- Ensured a seamless experience by customising solutions to meet customers' requirements and preferences.
- Strengthened customer relationships to deepen loyalty and drive repeat business.
- Advanced product and service quality through proactive engagement and timely issue resolution.
- Delivered secure, reliable and high-performance services that customers can trust.

Value Created for CTOS Digital

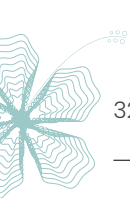
- Acquired insights into trends to anticipate market demands and drive innovation.
- Strengthened brand reputation to attract new customers and deepen long-term loyalty.
- Minimised legal risk and built trust among customers by adhering to privacy laws and regulations.
- Sustained growth and profitability supported by a strong customer base and relevant offerings.
- Positioned the company as a privacy-conscious organisation, driving clear market differentiation.

Map to Material Matters:



Risks:





VALUE CREATION AT CTOS STAKEHOLDER ENGAGEMENT

Frequency of Engagement

Weekly	Monthly	Every 2 Months	Quarterly	Bi-Annually	Annually	As Required	Daily	Ongoing
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GOVERNMENT & REGULATORY BODIES



Why We Engage

Compliance with legal and regulatory requirements is a core priority, enabling effective risk mitigation and uninterrupted operations. By staying ahead of regulatory developments, we help to shape fair policies, support national priorities and advance industry growth.

Channel & Frequency of Engagement

- Continuous active engagement and consultations
- Independent audit

Key Concerns Raised

- Apt and trustworthy reporting.
- Clear communication on ESG priorities and sustainability initiatives.
- Intensified compliance and data-driven decision-making.

Our Response

- Imposed internal controls to ensure compliance with changing regulatory requirements and standards.
- Organised regular training programmes for employees to stay updated on regulatory requirements.
- Created a dedicated liaison team to accelerate clear and timely communication.
- Published detailed disclosures in line with regulatory guidelines to enhance transparency.
- Engaged third-party auditors to verify compliance to legal standards.

Value Created for Regulators

- Preserved industry stability and ensured compliance with relevant regulations.
- Monitored relevant regulations and laws actively to maintain compliance.
- Reduced systemic risk through enhanced data security controls, lowering the likelihood of large-scale breaches.
- Competently assigned resources in support of programmes including grants, subsidies and collaborations.

Value Created for CTOS Digital

- Championed policies that promote a business-friendly environment and sustainable growth.
- Enhanced transparency and trust, strengthening public perception and reinforcing investor confidence.
- Secured access to essential resources and incentives, driving operational performance.
- Sustained resilient regional operations to ensure stability, agility and alignment with evolving regulatory requirements.

Map to Material Matters:

Risks:

VALUE CREATION AT CTOS
STAKEHOLDER ENGAGEMENT

Frequency of Engagement



LOCAL COMMUNITIES



Why We Engage

Active engagement with communities encompassing both individuals and SMEs advances digital financial inclusion and addresses social priorities in support of sustainable development. Strong partnerships stimulate socio-economic growth, foster transformative change and empower communities to take control of their financial futures.

Channel & Frequency of Engagement

- A** Independent stakeholder engagement survey
- W** Webinars, roadshows, social media and emails
- A** Online surveys
- M** Financial literacy workshops and educational outreach

Key Concerns Raised

- Enhance credit reporting for individuals and SMEs and simplifying credit health monitoring for individuals.
- Maintain strong data governance, ethical standards and personal data protection.
- Diligent oversight to achieve regulatory compliance and transparent reporting.
- Bridging the gap in financial literacy and credit scoring awareness.

Our Response

- Implemented simplified credit reporting tools and intuitive platforms tailored for SMEs and individual consumers.
- Hosted SME networking events and individual financial wellness clinics to promote knowledge-sharing and personal fiscal responsibility.
- Organised nationwide roadshows and webinars to strengthen broader financial literacy and digital security awareness.

Value Created for Local Communities

- Provided individuals and businesses with the tools to improve their creditworthiness and access to financing.
- Advanced sustainable development and improved quality of life by narrowing the digital financial gap.
- Aligned business goals with local cultural values, societal needs and consumer data protection.

Value Created for CTOS Digital

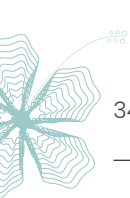
- Unlocked new market opportunities through community-led initiatives.
- Strengthened business growth through long-term, sustainable partnerships and high brand loyalty.
- Advanced inclusivity and reinforced public trust, cementing our role as a critical pillar of the nation's financial ecosystem.

Map to Material Matters:



Risks:





VALUE CREATION AT CTOS STAKEHOLDER ENGAGEMENT

Frequency of Engagement



SHAREHOLDERS & INVESTORS



Why We Engage

Effective investor engagement underpins transparency, strengthens trust and cultivates long-term partnerships. Timely and consistent updates on financial performance, strategic direction and market opportunities enable informed decision-making and reinforce confidence in our growth trajectory.

Channel & Frequency of Engagement

- A** Annual General Meetings (AGMs)
- AR O** Website
- M Q** Investor and analyst briefings, roadshows, group meetings, private sessions and forums
- AR Q** Announcements to Bursa on financial performance and material information

Key Concerns Raised

- Transparency in decision-making for shareholders.
- ESG-driven risk management implementation.
- Good financial performance and resilience.

Our Response

- Organised >70 investor meetings to articulate ASEAN expansion strategies, outlining progress, priorities and growth opportunities.
- Delivered timely updates on financial performance, regulatory developments, growth drivers, profitability and cost discipline.
- Reported on measurable progress through sustainability reports and disclosures.

Value Created for Investors

- Forged long-term partnerships and sustainable growth amid market uncertainty.
- Reinforced monetary growth priorities to drive long-term success.
- Delivered strategic financial support to capitalise on expansion opportunities.

Value Created for CTOS Digital

- Reinforced our standing as a trusted leader in credit reporting and analytics.
- Established strong feedback loops to refine strategy and stay aligned with evolving market expectations.

Map to Material Matters:



Risks:



VALUE CREATION AT CTOS
STAKEHOLDER ENGAGEMENT

Frequency of Engagement



SUPPLIERS AND BUSINESS PARTNERS



Why We Engage

Suppliers are central to our sustained growth and expansion. Transparent and performance-driven engagement ensures consistent quality and dependable delivery while fostering collaborative, long-term partnerships. Their partnership strengthens operational resilience and reinforces reliability of our value chain.

Channel & Frequency of Engagement

- Regular meetings
- Strategic dialogues

Key Concerns Raised

- Collective dedication to ESG leadership.
- Disclosure of environmental efforts.
- Collaboration through open dialogue.

Our Response

- Strengthened vendor compliance through a structured assessment framework.
- Organised awareness sessions to reinforce adherence to procurement policies.

Value Created for Local Suppliers

- Streamlined production and business operations to manage demand consistently.
- Optimised operations to meet evolving market demands, maintaining flexibility and resilience.

Value Created for CTOS Digital

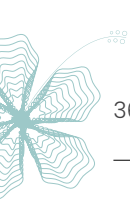
- Identified and mitigated supply chain risks to enhance stability.
- Strengthened supply chain reliability for consistent delivery of goods and services.
- Thrived to uphold the quality of our products and services based on the industry standard.

Map to Material Matters:



Risks:





VALUE CREATION AT CTOS

MATERIAL MATTERS

Our strategic priorities are shaped by our stakeholder needs. In 2025, we strengthened our approach by adopting the double materiality principle, which evaluates material matters from two complementary perspectives:

- **Financial materiality (outside-in):** how sustainability-related risks and opportunities may affect CTOS' financial performance, position and prospects.
- **Impact materiality (inside-out):** how CTOS' activities, products and services create actual or potential impacts on the environment, society and the economy.

By adopting double materiality, the Group strengthens how it supports regulatory alignment under the National Sustainability Reporting Framework, enhances transparency for stakeholders and provides clearer, decision-useful insight for management, investors and the Board.

Materiality Assessment Process

The materiality assessment was designed to be practical, inclusive and decision-focused. Each stage of the process serves a distinct purpose, from identifying potential topics to validating insights through stakeholder engagement and leadership validation. To enhance decision-usefulness, the Group incorporated Impact, Risk and Opportunity (IRO) analysis for each material matter:

Impacts: How the matter affects stakeholders, including positive and negative outcomes.

Risks: Where insufficient management of the matter may create financial, operational or reputational exposure.

Opportunities: Where the matter may support growth, resilience or competitive advantage.

By integrating IRO insights into the assessment, stakeholder and leadership feedback is translated into actionable intelligence that supports prioritisation, risk management and strategic decision-making.

Key Steps

What we Did

01 Identifying Relevant Issues

We began by identifying a broad list of sustainability topics that could be relevant to CTOS. This was informed by a review of regulatory requirements, recognised sustainability standards and industry benchmarks.

02 Stakeholder Prioritisation

We identified and prioritised key stakeholder groups to ensure that engagement focused on those most relevant to the Group's business and outcomes. Stakeholders were assessed using a structured scoring approach based on:

- Influence on the Group's strategic decisions;
- Dependency of the Group on these stakeholders;
- Representativeness of the Group's values and operating context; and
- Level of interest in the Group's activities.

The prioritisation process informed the selection of stakeholders for engagement under the impact and financial materiality assessments

03 Stakeholder Engagements

We conducted stakeholder engagements across two complementary dimensions:

- (Impact Materiality): Focus group discussions and online surveys were conducted with employees, customers, suppliers and regulator to assess the actual and potential impacts of the Group's activities, products and services on the economy, society and the environment; and
- (Financial Materiality): One-on-one interviews and online surveys were conducted with selected CTOS Digital leaders and investors to assesses how sustainability-related risks and opportunities may affect the Group's financial performance, position and prospects.

The combination of interviews and online surveys enabled a more in-depth evaluation of the likelihood and interdependencies between sustainability impacts and business outcomes.

VALUE CREATION AT CTOS MATERIAL MATTERS

04 Evaluation of Material Matters

We analysed each material matter using a combination of quantitative and qualitative inputs to determine its relative importance.

- Quantitative feedback serves as the foundation for the validation process of the materiality matrix, derived from online survey results ranked by each stakeholder group.
- Qualitative inputs provide deeper context on stakeholder concerns and expectations, highlighted emerging issues and potential IROs associated with each material matter.

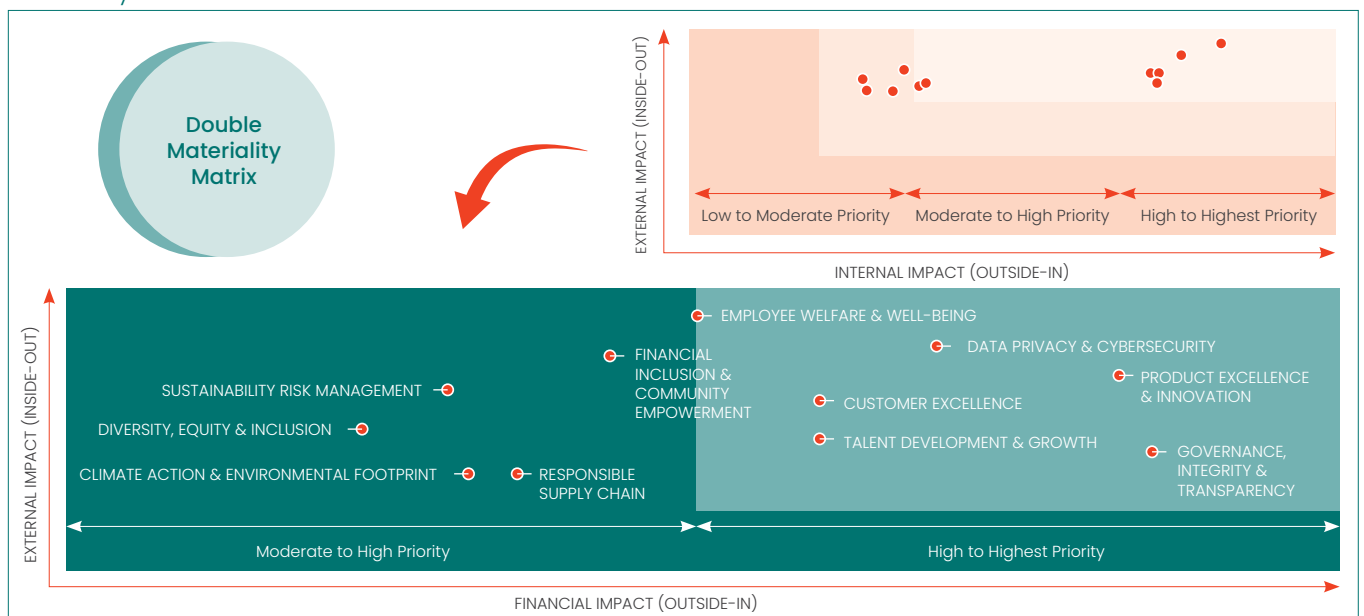
05 Review, Validation and Approval

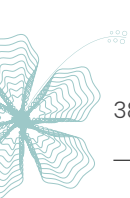
We reviewed and compared insights from stakeholder and leadership to finalise the list of material matters and its associated IROs. The final materiality matrix was validated by the senior management team and approved by the Board of Directors (BOD).

Key Updates in 2025

- **Core Priorities Are Clear:** Data privacy, cybersecurity, governance and talent continue to be core priorities. However, Customer Excellence emerged as a key stakeholder pain point, with clear financial implications, and has therefore been recognised as a high-materiality topic.
- **Balancing Financial Performance with Impact Priorities:** CTOS will need to deliberately balance short-term financial performance targets with longer-term sustainability and impact objectives. Addressing current gaps will require targeted initiatives, appropriate resourcing and clear accountability.
- **Financial Inclusion is a Growth Lever and Opportunity:** Financial Inclusion & Community Empowerment demonstrates strong impact materiality, with stakeholders highlighting opportunities to bridge banks, SMEs and younger consumers.
- **Trust Drives Revenue Resilience:** Leadership highlighted that majority of revenue is recurring and stakeholders consistently link CTOS' value to reliable analytics, data accuracy and responsiveness, while highlighting revenue risk if competitors deliver superior or faster insights.
- **Innovation Must Be Governed:** Stakeholders recognise AI as a driver of efficiency, analytics and user experience but raised concerns on cost and data accuracy if clear governance and capability do not keep pace.
- **People and Culture Affect Execution:** Stakeholders highlighted turnover, workload pressures, skills gaps and uneven engagement. Leadership emphasised the importance of training, succession planning and reskilling, particularly as automation increases.
- **Environmental Expectations are Rising:** While environmental impact is not currently viewed as a near-term financial risk, stakeholders increasingly expect clearer voluntary climate-related disclosures.

Materiality Matrix:





VALUE CREATION AT CTOS

MATERIAL MATTERS

PILLAR 01

EMPOWERING PROGRESS & RESILIENCE

Stakeholder



Capitals



Strategic Focus Areas



Related Risk



UNSDG



M1

Data Privacy & Cybersecurity

Safeguard stakeholder data and privacy while ensuring business continuity through a strong cybersecurity system and promoting awareness of data privacy best practices.

Impact

Positive: Safeguard customer information, build trust and enable secure participation in the financial ecosystem.

Negative: Weak data governance or system vulnerabilities may expose customers to fraud, identity theft and service delays, undermining confidence and customer experience.

Risks & Opportunities

Risks: Cyber incidents, data breaches, or system outages may lead to regulatory penalties, remediation costs, operational disruption and reputational damage.

Opportunities: Good cybersecurity and compliance capabilities differentiate the Group as a trusted data partner, support expansion of digital and analytics offerings and deepen partnerships with financial institutions and regulators.

M2

Product Excellence & Innovation

Deliver reliable, high-quality solutions through innovative technology and responsible practices, ensuring fair credit for all customers.

Impact

Positive: Enhance customer decision-making, expand access to financing and strengthen stakeholder trust.

Negative: Lack of transparency or poorly governed applications may expose customers to bias, misuse of data and reduced confidence in products and services.

Risks & Opportunities

Risks: System downtime, data governance gaps, regulatory non-compliance, or inadequate explainability in AI-driven solutions may lead to financial losses, legal exposure, reputational damage and reduced customer retention.

Opportunities: Embedding responsible innovation with strong data governance and ESG-enabled product features differentiates offerings.

M3

Customer Excellence

Build trusted relationships with customers through proactive engagement, timely and transparent service delivery, and consistent responsiveness to customer needs and concerns.

Impact

Positive: Improve customer satisfaction and enable customers to access value-added solutions such as ESG screening and AI-driven insights.

Negative: Limited engagement or insufficient sustainability support for SME customers may slow their transition, reduce customer satisfaction and weaken stakeholder trust and credibility.

Risks & Opportunities

Risks: Increased engagement efforts may raise operating costs, while weak relationship-building or limited SME engagement may lead to missed growth opportunities, lost revenue and reputational erosion.

Opportunities: Embedding DEI into people management and leadership practices enhances talent attraction and retention and strengthens organisational performance.

VALUE CREATION AT CTOS
MATERIAL MATTERS

M4

Financial Inclusion & Community Empowerment

Empower stakeholders, particularly underserved communities, with the knowledge, skills and understanding of financial concepts and practices that enable them to achieve their financial objectives while also addressing other community challenges.

Impact	<p>Positive: Empower individuals and SMEs to make informed financial decisions and reduce bad credit score risk to support broader economic participation and resilience.</p> <p>Negative: Limited safeguards or unclear use of alternative data may increase risks of over-borrowing, misinformed financial decisions and higher default rates, potentially affecting individuals, communities and financial institutions.</p>
Risks & Opportunities	<p>Risks: Regulatory uncertainty or ineffective credit assessment methods may increase default risk, operational costs and reputational exposure, weakening trust in inclusion initiatives.</p> <p>Opportunities: Expanding financial education and leveraging responsibly governed alternative data strengthen SME lending to drive demand for data-driven products.</p>

PILLAR
03

NURTURING EMPLOYEE GROWTH

Stakeholder



Capitals



Strategic Focus Areas



Related Risk



UNSDG



M5

Diversity, Equity & Inclusion (DEI)

Nurture a workplace culture that respects all employees and ensures equitable and fair treatment regardless of their differences in age, gender, race and social background.

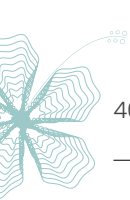
Impact	<p>Positive: Foster diverse perspectives and support a culture of fairness, innovation and positive employee engagement.</p> <p>Negative: Lack of inclusivity, perceived inequities, or insufficient representation may reduce morale, limit diverse viewpoints and weaken organisational culture and employee confidence.</p>
Risks & Opportunities	<p>Risks: Weak DEI practices may increase talent attrition, constrain access to diverse talent pools and reduce workforce effectiveness and collaboration.</p> <p>Opportunities: Deepening SME engagement through sustainability-aligned offerings enhances customer loyalty and unlocks new revenue streams to support customers' ESG transition.</p>

M6

Talent Development & Growth

Empower employees for the future by equipping them with skills, knowledge and capabilities to excel in their careers while ensuring competitive compensation to attract and retain top talent

Impact	<p>Positive: Strengthen workforce capability, service reliability and customer trust, while supporting long-term organisational resilience and innovation.</p> <p>Negative: High turnover or insufficient skills development may reduce service quality, increase stress and dissatisfaction and weaken employee morale and customer confidence.</p>
Risks & Opportunities	<p>Risks: Loss of critical talent, rising labour costs and skills gaps may increase operating costs, weaken strategic execution and revenue growth.</p> <p>Opportunities: Targeted upskilling, succession planning and employee development enhance productivity, service consistency and innovation capacity, positioning the Group to compete effectively in a rapidly evolving market.</p>



VALUE CREATION AT CTOS

MATERIAL MATTERS

M7

Employee Welfare & Well-being

Promote a positive work culture by taking care of employees' physical and mental health and wellness while ensuring trust, open communication and strong employee engagement.

Impact	<p>Positive: Improve morale, engagement and retention, enabling employees to deliver more consistent, high-quality service and strengthening the Group's employer brand.</p> <p>Negative: Poor well-being and high workloads may lead to stress, errors, disengagement and dissatisfaction, negatively affecting service quality and customer experience.</p>
Risks & Opportunities	<p>Risks: Sustained stress, absenteeism and turnover may increase recruitment and training costs, disrupt operations and harm the Group's reputation as an employer and service provider.</p> <p>Opportunities: Embedding employee well-being into people management practices improves long-term workforce stability.</p>

PILLAR 04

ACTING WITH INTEGRITY

Stakeholder



Capitals



Strategic Focus Areas



Related Risk



UNSDG



M8

Governance, Integrity & Transparency

Uphold the highest standards of integrity, accountability and transparency across our operations to protect stakeholder interests against all forms of misconduct.

Impact	<p>Positive: Clear governance structures, transparent information sharing and strong data governance enhance stakeholder confidence, improve decision-making quality and support consistent execution across the organisation</p> <p>Negative: Lack of clarity in policies, approval processes, or leadership communication may weaken trust, increase uncertainty for suppliers and customers, and result in inconsistent practices and reduced confidence in the Group's governance.</p>
Risks & Opportunities	<p>Risks: Governance misalignment and regulatory non-compliance may increase compliance costs, operational errors, financial disputes and exposure to reputational and customer confidence risks.</p> <p>Opportunities: Good ESG governance enhances risk management, enabling long-term value creation and creates market differentiation.</p>

M9

Sustainability Risk Management

Effectively identify, manage and mitigate Environmental, Social and Governance ("ESG") risks to ensure long-term value creation for our stakeholders and business.

Impact	<p>Positive: Support uninterrupted service delivery and enhances customer confidence and operational stability.</p> <p>Negative: Inadequate management of climate-related and technology concentration risks may increase vulnerability to system outages and service disruptions.</p>
Risks & Opportunities	<p>Risks: System outages, climate impacts on data centres, or concentration risks arising from cloud dependency may disrupt operations and impact service reliability.</p> <p>Opportunities: Strengthening sustainability-aligned risk management and resilient infrastructure enhances business continuity and reduces long-term operational risk.</p>

VALUE CREATION AT CTOS
MATERIAL MATTERS

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<p>Promote ethical, transparent and sustainable practices across our supply chain, ensuring compliance and fairness for human rights.</p>	
<p>Impact</p>	<p>Positive: Strengthen supplier engagement, clearer expectations and structured recruitment for onboarding processes improve supplier capability and operational stability.</p> <p>Negative: Inconsistent communication, limited cross-functional engagement, or inefficient supplier management practices may create uncertainty, reduce transparency and disrupt suppliers' operational planning and performance.</p>
<p>Risks & Opportunities</p>	<p>Risks: Weak supplier coordination or governance gaps may lead to operational inefficiencies, higher recruitment and onboarding costs, extended time-to-hire and reduced supplier effectiveness, impacting service delivery and cost control.</p> <p>Opportunities: Embedding sustainability expectations and structured processes into supplier management enhances efficiency, strengthens supplier relationships, improves workforce readiness, and supports scalable and resilient operations.</p>

PILLAR
02
DRIVING ENVIRONMENTAL RESPONSIBILITY

Stakeholder



Capitals



Strategic Focus Areas



Related Risk

R2

R5

R6

UNSDG

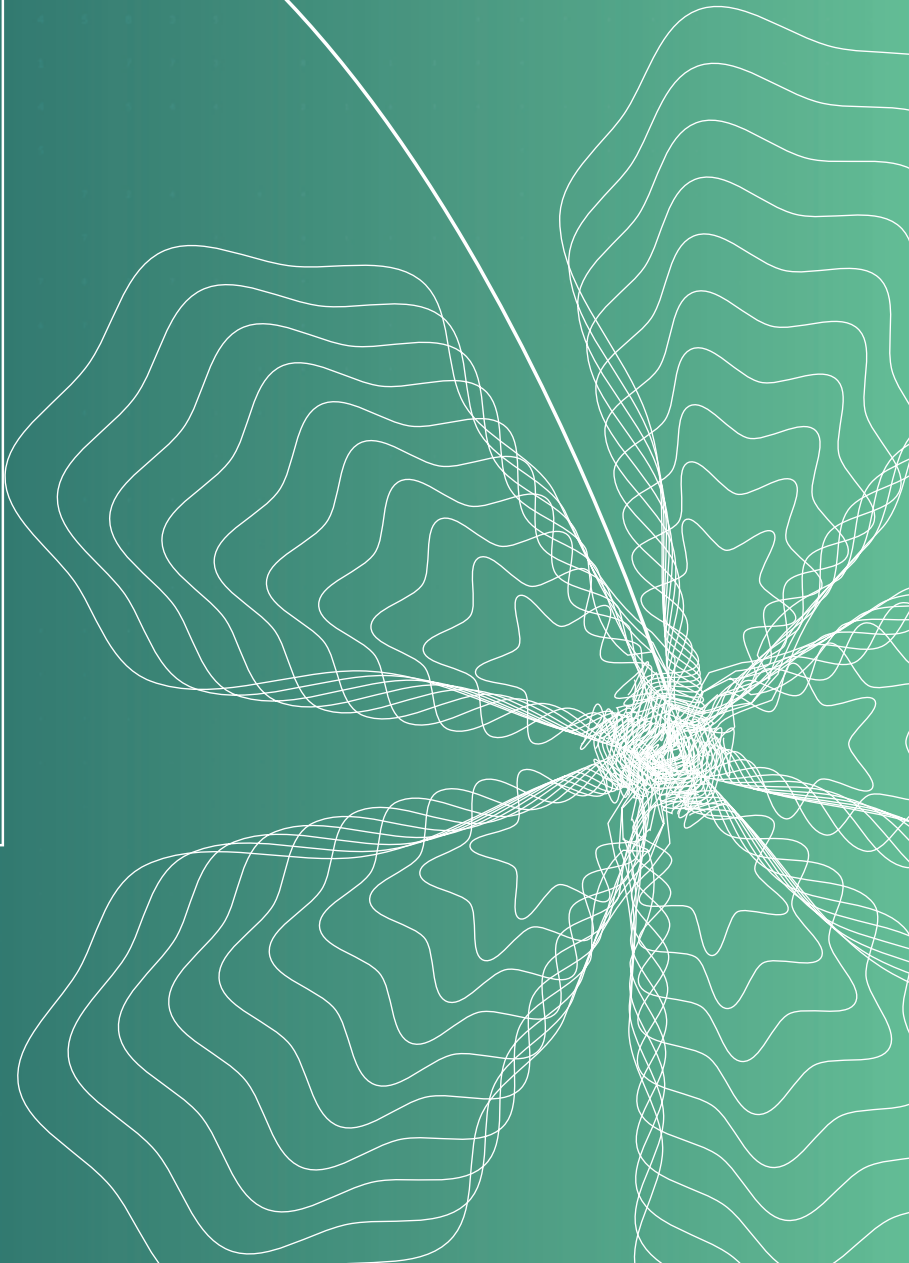


<div style="display: flex; align-items: center;"> <div style="border: 1px solid red; border-radius: 50%; width: 30px; height: 30px; display: flex; align-items: center; justify-content: center; margin-right: 10px;"> M11 </div> <div> <h3 style="margin: 0;">Climate Action & Environmental Footprint</h3> </div> </div>	
<p>Minimise GHG emissions and manage resource use responsibly to mitigate climate change, minimise environmental impacts and contribute to a low-carbon future.</p>	
<p>Impact</p>	<p>Positive: Reduce environmental footprint, lowers resource use and supports more resilient and efficient service delivery for customers and communities.</p> <p>Negative: Insufficient climate resilience, limited disclosure or reliance on resource-intensive infrastructure may contribute to service disruptions, reputational concerns for customers and increased pressure on shared environmental resources.</p>
<p>Risks & Opportunities</p>	<p>Risks: Physical climate impacts and evolving environmental regulations may disrupt operations while increasing compliance and operating expenses.</p> <p>Opportunities: Adopting energy-efficient technologies, cloud optimisation and transparent sustainability communication strengthens operational resilience.</p>

SECTION 5

MANAGEMENT DISCUSSION AND ANALYSIS

Group Chief Executive Officer's Message	043
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Business Review	061



MANAGEMENT DISCUSSION AND ANALYSIS

GROUP CHIEF EXECUTIVE OFFICER'S MESSAGE



STRENGTHENING THE FOUNDATION, ACCELERATING INTELLIGENCE

embedded the infrastructure needed to power the next chapter of CTOS' story. Revenue grew 7.0% year-on-year to RM326.1 million. These results were achieved while reinvesting in cloud infrastructure, product development, and talent, investments that are necessary for sustainable growth.

NAVIGATING A YEAR OF STRATEGIC INVESTMENT

The financial landscape in FY2025 called for both discipline and courage. Group revenue grew across our Key Accounts and Direct-to-Consumer segments. Our normalised PATAMI of RM88.1 million reflected the accelerated transformation investments, including cloud migration, product and technology, talent build-up, and customer acquisition initiatives.

We undertook general cost and resource optimisation exercises during the year, strengthening operational discipline while reinvesting in the capabilities. We also made considered portfolio decisions. The disposal of our 26% stake in Experian Information Services (Malaysia) Sdn Bhd, completed on 18 December 2025 for RM80.0 million, was a deliberate step in optimising our associate portfolio. This is reported as a discontinued operation, with a gain of RM17.9 million. Our full-year associates' contribution of RM36.3 million, up 18.5% year-on-year, underscores the continued strategic value of our ecosystem investments.

Dear Valued Stakeholders,

It is a privilege to address you for the first time as Group Chief Executive Officer of CTOS Digital Berhad. While I assumed this role in January 2026, I have had the benefit of observing a quarter of meaningful progress, one that tested the organisation's resilience and affirmed the strength of our organisation. The team navigated a year of deliberate investment and transition with discipline, and the foundation I have inherited is one I am proud to build upon.

FY2025 was a year defined by strategic choices: we invested ahead of growth, streamlined our portfolio, and

2025 KEY HIGHLIGHTS

RM326.1M

Group Revenue
(+7.0%)

RM88.1M

Normalised PATAMI
Reported RM104.9

RM36.3M

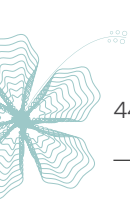
Associates'
Contribution

5.0M+

Registered
Consumers

2.70 sen

Total FY2025
Dividend



MANAGEMENT DISCUSSION AND ANALYSIS

GROUP CHIEF EXECUTIVE OFFICER'S MESSAGE

PERFORMANCE ACROSS BUSINESS SEGMENTS

Each of our four segments contributed to FY2025, though their stories differ in character and pace. The Key Accounts (Malaysia) segment delivered 8.4% growth to RM116.8 million, while the Key Accounts (International) segment grew to RM46.1 million, up 17.5% year-on-year, with strong second-half recovery in Indonesia and continued execution in the Philippines.

The Commercial segment delivered revenue of RM125.2 million in FY2025. The Commercial segment maintained its focus on customer acquisition and retention, and efforts to drive deeper usage of enhanced credit solutions for improved business decision-making continued.

The Direct-to-Consumer segment was our standout performer, achieving 42.8% year-on-year revenue growth to RM37.9 million and seven consecutive quarters of sequential growth.



The transition from bureau to trusted intelligence is anchored in five strategic pillars that will guide the Group's direction from FY2026:

- Intelligence Leadership
- Credit Ecosystem & Expansion
- Digital Experience & Platform
- Financial Inclusion & Empowerment
- Operational Excellence & Governance.



SHARPENING OUR STRATEGIC DIRECTION

In 2026, we crystallised a refreshed strategic framework for the Group. Under the vision of Trusted Intelligence Behind Every Transaction, CTOS is repositioning from Malaysia's leading credit reporting agency (CRA) to ASEAN's trusted intelligence. The transition from a CRA to trusted intelligence is anchored in five strategic pillars that will guide the Group's direction from FY2026:

- Intelligence Leadership
- Credit Ecosystem & Expansion
- Digital Experience & Platform
- Financial Inclusion & Empowerment
- Operational Excellence & Governance.

These pillars will be detailed in the FY2026 Annual Report as the Group progresses against them.

The investments made in FY2025 in cloud infrastructure, AI capabilities, fraud intelligence, and consumer platform development, are the enabling layer of this repositioning. They were deliberate, they were necessary, and they are already translating into a stronger commercial pipeline entering FY2026.

ESG: SUSTAINABLE GROWTH WITH INTEGRITY

In FY2025, CTOS received a FTSE4Good score of 4.2, a four-star rating that reflects the credibility of our Environmental, Social and Governance practices. Our ISO/IEC 27001:2022 certification continues to underpin trust in our data stewardship. We are actively progressing alignment with Malaysia's National Sustainability Reporting Framework (NSRF) and IFRS S1/S2 standards. Financial inclusion is embedded in our mission, and our work serving thin-file consumers and our financial literacy programme reaching approximately 16 million credit-active consumers in Malaysia, are practical expressions of this commitment.

ACKNOWLEDGEMENTS

On behalf of the Board and management, I want to express deep appreciation to Erick Hamburger for his leadership in building CTOS into the company it is today. I am equally grateful to Kevin Loh Kok Leong for his steady hand during the leadership transition. To our customers, your confidence in our solutions fuels our pursuit of excellence. To our shareholders, your long-term support enables us to invest with conviction. To our employees, the progress of FY2025 is your achievement. To our Board, regulators, and partners, your guidance and collaboration remain invaluable.

The Group remains cautiously optimistic about its growth prospects. Overall, the Group is firmly committed to disciplined growth, strong execution, and the delivery of sustainable long-term shareholder value.

Ankur Sehgal

Group Chief Executive Officer
CTOS Digital Berhad

MANAGEMENT DISCUSSION AND ANALYSIS

OPERATING ENVIRONMENT



ECONOMIC REVIEW & OUTLOOK

In 2025, the global economy navigated a period of heightened uncertainty. The International Monetary Fund projected full-year global GDP growth of approximately 3.3%, reflecting a moderation from earlier expectations amid ongoing geopolitical tensions, trade fragmentation, and persistent policy uncertainty. Despite this backdrop, the global economy remain resilient, supported by tight labour markets in advanced economies and a continued, albeit gradual, normalisation of inflation ¹.

In Malaysia, the economy performed well. GDP grew 5.1% year-on-year in the first quarter, positioning growth within Bank Negara Malaysia's full-year projection of 4.5%–5.5%. Growth was broad-based, supported by firm domestic consumption, improving investment activity, and continued expansion in the service sector. Inflation remained well-contained, preserving household purchasing power and supporting real credit demand ².

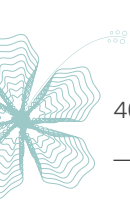
Malaysia's banking system remained healthy and well-capitalised. Total loans continue to expand in 2025, with household credit and SME financing as key drivers. SME's ³, which represent approximately 97% of business establishments and contribute around 38% of GDP, continued to demonstrate credit demand ⁴. This environment of measured credit expansion provided a constructive operating backdrop for CTOS' businesses across all segments.

1. International Monetary Fund, World Economic Outlook Update, April 2025.

2. Bank Negara Malaysia, Quarterly Bulletin, First Quarter 2025; Department of Statistics Malaysia, Gross Domestic Product First Quarter 2025.

3. Bank Negara Malaysia, Monetary and Financial Developments, 2025.

4. SME Corporation Malaysia, SME Annual Report (latest available statistics).



MANAGEMENT DISCUSSION AND ANALYSIS OPERATING ENVIRONMENT

CREDIT REPORTING INDUSTRY REVIEW & OUTLOOK

WHAT HAPPENED THIS YEAR?

The credit reporting and data intelligence industry in Malaysia continued to evolve in 2025, supported by the expansion of digital banking, wider use of AI and advanced analytics in financial services, and a stronger regulatory focus on data governance and consumer protection.

In Malaysia, all five licenced digital banks had commenced operations by end-2025, marking an important milestone in the country's digital finance landscape. The Consumer Credit Act 2025 also expanded the regulated perimeter for consumer credit by bringing previously unregulated non-bank credit providers and credit service providers within a formal oversight framework.

HOW WERE WE IMPACTED?

CTOS operated in an environment characterised by sustained demand for credit intelligence, data, and analytics solutions. The continued expansion of digital banking and financial services supported increased utilisation of credit data and decisioning capabilities across financial institutions. At the same time, the ongoing shift towards real-time and API-driven decisioning workflows contributed to demand for higher-value analytics and integrated solutions.

The evolving cybersecurity and fraud landscape also acted as a key demand driver. As digital transactions increased and fraud risks became more pronounced, demand for fraud detection, identity verification, and consumer identity protection solutions strengthened across customer segments. In parallel, regulatory developments, including the introduction of new consumer credit frameworks and the progression of sustainability-related disclosure standards such as IFRS S1 and S2, continued to shape compliance requirements and operating expectations for financial institutions.

HOW DID WE RESPOND?

CTOS continued to invest in capability, infrastructure, and talent to support its long-term growth strategy. During the year, the Group advanced its cloud infrastructure initiatives, strengthening the foundation for scalable, real-time data delivery and analytics. AI capabilities were progressively integrated into selected internal workflows to enhance operational efficiency and productivity. The Group also strengthened its fraud intelligence and identity solutions, supporting increased engagement with financial institutions.

On the consumer front, CTOS further developed its platform through marketing initiatives, growing its registered user base to over 5.0 million. Internationally, the Group continued to expand its presence in Southeast Asia, increasing its client base across key markets mainly in the Philippines. The Group also undertook portfolio optimisation initiatives during the year, in line with its strategic focus on core growth areas.

WHAT IS OUR OUTLOOK?

We enter FY2026 with cautious optimism, supported by resilient structural drivers including the expansion of digital financial services, increasing adoption of AI and alternative data, financial inclusion imperatives, and evolving regulatory requirements. Anchored on the Group's strategic vision of becoming the Trusted Intelligence Behind Every Transaction, investments made in FY2025 across cloud infrastructure, AI capabilities, and product innovation are transitioning from build to deployment and value realisation. This positions the Group to scale its digital platforms, deepen client integration, and enhance monetisation across its core segments.

The Group's pipeline of analytics, fraud and identity solutions, and client implementations remains robust, supporting growth across Financial Institutions and Corporates, Commercial, Consumer, and International segments. In parallel, the Group continues to strengthen its value proposition through alternative data, while advancing strategic partnerships and selective acquisitions across ASEAN. Investments in digital infrastructure, security, and governance will support scalability, resilience, and regulatory alignment, alongside ongoing automation and cost optimisation initiatives. The Group remains committed to disciplined execution, sustainable growth, and the delivery of long-term shareholder value.

MANAGEMENT DISCUSSION AND ANALYSIS OPERATING ENVIRONMENT

KEY MARKET TRENDS

The following six market trends represent the most significant external forces shape CTOS' operating environment in 2025, and are expected to remain influential in the years ahead.

Key Market Trend

Accelerating Digitalisation of Financial Services

Digital banking, embedded finance, and real-time payment infrastructure are reshaping how credit is delivered.

Potential Impact

- + Growth in demand for real-time, API-integrated credit data and analytics across digital origination workflows.
- + Expansion of addressable market as digital banks, e-wallets, and BNPL providers require alternative credit data.
- Continuous investment required in platform scalability, cloud infrastructure, and cybersecurity.

How We Responded

- Accelerated migration to cloud-native, API-first platform architecture in Q4 2025.
- Launched new Digital Solutions contracts with a telco and a development financial institution.
- Invested in mobile app revamp targeted for launch in Q2 FY2026.

Outlook

- As digital bank loan volumes accelerate, demand for analytics and decisioning products is expected to grow proportionately.
- Expand open API and embedded decisioning capabilities to serve digital-first financial platforms.
- Continue mobile app and consumer platform investment to meet the expectations of a digitally-native audience.

Key Market Trend

Adoption of Artificial Intelligence in Credit & Risk

AI and machine learning are transforming credit risk assessment, fraud detection, and customer engagement. Lending decisions are shifting from rules-based processing to AI-led intelligence.

Potential Impact

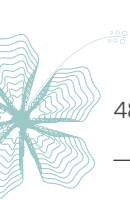
- + Enables CTOS to offer more accurate, real-time predictive risk models and fraud detection capabilities.
- + AI-driven automation improves internal productivity, data quality, and insight delivery speed.
- Rising expectations around AI governance, model explainability, and responsible AI deployment.

How We Responded

- Deployed enhanced predictive risk models
- Adopted AI in key internal workflows across data processing, quality assurance, and operational reporting.
- Accelerated cloud infrastructure to support real-time AI-driven service delivery at scale.

Outlook

- Roll out new AI-powered analytics products in 1H FY2026, with major FIs already secured for validation.
- Scale fraud intelligence solutions across Key Account clients aligned with Malaysia's national digital fraud prevention mandate.
- Invest in responsible AI governance frameworks aligned with emerging regulatory expectations.



MANAGEMENT DISCUSSION AND ANALYSIS OPERATING ENVIRONMENT

Key Market Trend

Financial Inclusion and the Credit-Invisible Population

Across ASEAN, approximately 290 million adults remain credit-invisible. Governments and regulators are intensifying efforts to close this gap, creating a significant addressable market for alternative credit scoring.

Potential Impact

- + Large addressable market for alternative credit scoring and financial empowerment tools directly aligned with CTOS' mission.
- + Growing consumer demand for self-managed credit monitoring and financial health tools in Malaysia.
- Serving thin-file and underbanked populations requires rigorous alternative data management and risk modelling.

How We Responded

- D2C segment achieved 42.8% revenue growth to RM37.9 million, with the registered CTOS ID user base surpassing 5.0 million.
- Launched credit monitoring free trial (May 2025) and business credit reports (June 2025).
- Expanded to 120+ clients across Indonesia and the Philippines with 100% telco data coverage.

Outlook

- Launch refreshed mobile app (Q2 FY2026) with personalised financial health journeys.
- Execute two new D2C partnerships in H1 FY2026 to expand access through adjacent consumer platforms.
- Continue expanding International beyond FinTech into multifinance and banking sectors.

Key Market Trend

Evolving Regulatory Landscape

Regulators across Malaysia and ASEAN are strengthening frameworks governing credit reporting, data privacy, and responsible lending. The Consumer Credit Act 2025 (CCA 2025) formally expands the regulated credit market.

Potential Impact

- + CCA 2025 formalises new categories of lenders that will require credit intelligence infrastructure, expanding CTOS' addressable market.
- + Court of Appeal confirms credit scoring falls within the scope of credit reporting under the Credit Reporting Agencies Act 2010, reinforcing CTOS' legal framework.
- Evolving NSRF and IFRS S1/S2 disclosure requirements increase compliance complexity and reporting obligations.

How We Responded

- Maintained full compliance with the CRA Act 2010, including annual Registrar audit for licence renewal.
- Progressed NSRF alignment with IFRS S1/S2 sustainability disclosure standards.
- Strengthened internal data governance and responsible AI frameworks.

Outlook

- Continue proactive regulatory engagement across all operating jurisdictions.
- Target full NSRF/IFRS S1/S2 compliance in the FY2026 reporting cycle.
- Monitor and adapt to emerging AI governance and credit decision regulations across ASEAN.

MANAGEMENT DISCUSSION AND ANALYSIS OPERATING ENVIRONMENT

Key Market Trend

Cybersecurity Threats and Data Security

Malaysia and ASEAN are experiencing a sharp increase in cybersecurity incidents and digital fraud. CyberSecurity Malaysia recorded 5,751 cybersecurity incidents in 2024, with fraud being the most prevalent category.

Potential Impact

- + Rising fraud volumes create strong demand for CTOS' identity verification, fraud detection, and credit monitoring solutions.
- + ISO/IEC 27001:2022 certification and security infrastructure investment serve as meaningful competitive differentiators.
- Continuous investment required in AI-driven security monitoring, vulnerability testing, and incident response.

How We Responded

- Maintained ISO/IEC 27001:2022 certification (Information Security, Cyber Security and Privacy Protection).
- Secured fraud solution contracts with three financial institutions, deploying AI-driven identity and fraud detection.
- Provided consumer identity protection through CTOS SecureID with alerts for compromised personal information.
- Conducted regular vulnerability assessments and penetration testing.

Outlook

- Scale fraud intelligence product suite across Key Account clients.
- Invest in next-generation AI-driven threat detection and endpoint protection.
- Expand consumer identity protection services in response to rising demand for personal data security.

Key Market Trend

Climate Change, ESG & Sustainable Finance

Malaysia's commitment to Net Zero by 2050, combined with Bursa Malaysia's enhanced sustainability disclosure requirements and IFRS S1/S2 adoption, is reshaping the operating environment for all listed companies.

Potential Impact

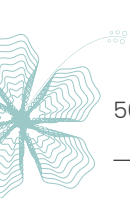
- + ESG disclosure requirements create demand for data solutions incorporating environmental and social risk factors.
- + Strong ESG performance enhances CTOS' positioning with ESG-conscious institutional investors.
- Short-term compliance costs associated with NSRF adoption, carbon footprint measurement, and climate risk disclosure.

How We Responded

- Achieved FTSE4Good score of 4.2 (four-star rating) in FY2025.
- Progressed toward NSRF compliance, aligning with IFRS S1/S2 sustainability disclosure standards.
- Accelerated cloud migration, improving energy efficiency relative to on-premise operations.

Outlook

- Achieve full NSRF and IFRS S1/S2 compliance in the FY2026 reporting cycle.
- Develop CTOS' decarbonisation roadmap targeting measurable Scope 1 and Scope 2 emissions reductions.
- Explore ESG data enrichment capabilities that help clients incorporate environmental risk into credit decisions.



MANAGEMENT DISCUSSION AND ANALYSIS

KEY RISKS & MITIGATION

The Group manages both existing and emerging risks through a comprehensive, integrated risk management framework that aligns with industry best practices and regulatory requirements. Our approach is structured and adaptable, ensuring resilience in an ever-evolving landscape.

Cyber & Technology Risk

Risk Trend



Increasing

Risk Description

Cyber and technology risk relates to the reliability, security, and resilience of the Group's information technology infrastructure, systems, and data. This includes risks arising from cyber threats, data security, system outages incidents and the increasing complexity of technology environments supporting critical business operations.

Impact to Value

- Business operations and service availability disruptions.
- Financial losses due to recovery costs and remediation efforts.
- Loss of data integrity and confidentiality.
- Erosion of customer and stakeholder confidence.
- Regulatory penalties and legal actions.

Key Mitigation Strategies

- Maintained an Information Security Management System (ISMS) certification in accordance with ISO/IEC 27001.
- Accomplished Project Elevate 2023–2025, the three-year cyber security strategy with key targets achieved.
- Implemented continuous system monitoring, threat detection, and incident response procedures.
- Conducted regular vulnerability assessments, penetration testing, and security reviews.
- Enhanced third-party technology risk management and oversight.
- Continued to enhance cyber security policies, standards and control frameworks, having regard to Bank Negara Malaysia's Risk Management in Technology (RMiT) requirements, with ongoing gap remediation initiatives in progress.
- Engaged external partners and independent auditors to assess controls and validate safeguards, enhancing cybersecurity and technology resilience.
- Enhanced the implementation of cyber security requirements for IT third-party service providers, including contractual and control expectations.
- Conducted cyber drill that enhanced incident response readiness and capabilities against potential cyber threat.

Opportunities

- Strengthen technology resilience and system reliability through independent reviews by specialist partners.
- Expand cloud security and resilience capabilities to support digital growth.
- Enhance stakeholder confidence through improved cybersecurity posture.
- Improve risk visibility and response capability through advanced monitoring tools.
- Support secure and scalable business growth.

Risk Movement

The information and data risk profile increased during the year due to growing data volumes, heightened regulatory expectations on data protection, and increased exposure to cyber and operational risks. The Group continues to enhance its data governance, security controls, and monitoring capabilities to manage these evolving risks.

MANAGEMENT DISCUSSION AND ANALYSIS KEY RISKS & MITIGATION

Information & Data Risk

Risk Trend



Increasing

Risk Description

Information and data risk relates to the confidentiality, integrity, and availability of the Group's data assets. As a credit reporting agency, the Group's operations depend heavily on the management of sensitive information. This exposes the Group to risks arising from data breaches, unauthorised access, data leakage, and inaccurate reporting.

Impact to Value

- Loss of customer and stakeholder confidence.
- Regulatory sanctions, legal action, and increased compliance costs.
- Financial losses from incident response, remediation, and compensation.
- Disruption to business operations and service delivery.
- Reputational damage affecting market position and long-term sustainability.

Key Mitigation Strategies

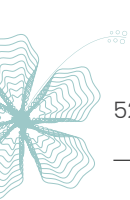
- Maintained a comprehensive information security framework aligned with regulatory and industry standards.
- Enhanced Implemented data classification, access controls, encryption, and monitoring mechanisms.
- Conducted regular security assessments, and system audits.
- Strengthened incident response, data breach management, and escalation procedures.
- Enhanced staff and vendor awareness on data protection and confidentiality obligations.
- Continued investment in secure data infrastructure and resilience controls.

Opportunities

- Strengthen market credibility through demonstrated data governance and protection standards.
- Enhance customer trust through improved data quality and transparency.
- Improve operational efficiency through better data management and controls.
- Support sustainable business growth through secure and reliable data platforms.

Risk Movement

The information and data risk profile increased during the year due to growing data volumes, heightened regulatory expectations on data protection, and increased exposure to cyber and operational risks. The Group continues to enhance its data governance, security controls, and monitoring capabilities to manage these evolving risks.



MANAGEMENT DISCUSSION AND ANALYSIS

KEY RISKS & MITIGATION

Regulatory Risk

Risk Trend



Stable

Risk Description

Regulatory risk arises from potential non compliance with laws, regulations, licensing requirements, and supervisory expectations governing our operations as a credit reporting agency. Failure to comply may result in enforcement actions, penalties, operational restrictions, or reputational damage. As regulatory requirements continue to evolve in areas of data governance, consumer rights, cybersecurity, and reporting obligations, the Group faces increasing obligations to ensure timely compliance, strengthen internal controls, and maintain efficient oversight.

Impact to Value

- Operational disruptions and restrictions on business activities
- Regulatory sanctions, penalties, or licence revocation
- Restricted access to critical data for service delivery
- Reputational impact and loss of stakeholder confidence

Key Mitigation Strategies

- Enhanced policies, procedures and controls to ensure regulatory compliance.
- Implemented comprehensive policies, procedures and controls to ensure regulatory compliance.
- Ongoing compliance monitoring and reporting to Management and Board.
- Timely regulatory engagement and communication on material incidents and developments.
- Enforced zero tolerance for non-compliance, addressing bribery and corruption risks.
- Regular internal and external audits to identify and remediate control gaps.
- Continuous compliance awareness and training across the organisation, with extended coverage to key vendors.
- Established secure reporting channels for any misconduct.

Opportunities

- Strengthen regulatory credibility and stakeholder trust through consistent compliance performance.
- Support sustainable business growth through improved regulatory readiness.
- Enhance governance maturity and operational discipline.
- Improve reputation and brand value, positioning the organisation as a trusted and reliable entity.

Risk Movement

The regulatory risk profile remained stable during the year, supported by the Group's continued adherence to regulatory requirements, effective compliance governance, and proactive engagement with regulators.

MANAGEMENT DISCUSSION AND ANALYSIS KEY RISKS & MITIGATION

Operational Risk

Risk Trend



Increasing

Risk Description

Operational risk relates to the risk of loss or disruption arising from inadequate or failed internal processes, people, systems, or from external events. This includes risks associated with process breakdowns, human error, system failures and business disruption.

Impact to Value

- Disruption to business operations and service delivery.
- Financial losses arising from process failures, errors, and remediation efforts.
- Reduced productivity and operational efficiency.
- Increased regulatory and compliance exposure.
- Reputational impact affecting customer and stakeholder confidence.

Key Mitigation Strategies

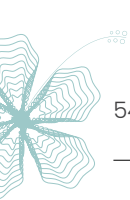
- Enhanced documentation of standard operating procedures and internal controls across key processes.
- Conducted regular risk and control self-assessments and operational reviews.
- Strengthened incident reporting, root cause analysis, and corrective action tracking.

Opportunities

- Improve operational efficiency through process standardisation and automation.
- Strengthen control effectiveness and accountability.
- Enhance service quality and customer experience.
- Improve organisational resilience and risk awareness.

Risk Movement

The operational risk profile increased during the year due to higher business activity, greater operational complexity, increased reliance on technology and third parties, and heightened regulatory expectations. The Group continues to strengthen its operational controls and monitoring processes to manage these evolving risks.



MANAGEMENT DISCUSSION AND ANALYSIS KEY RISKS & MITIGATION

Human Capital Risk

Risk Trend



Risk Description

Human capital risk relates to the Group’s ability to attract, retain, develop, and manage a competent workforce to support its operations and strategic objectives. This includes risks arising from talent shortages, high employee turnover, skill gaps, over-reliance on key personnel and challenges in maintaining workforce capability, engagement and continuity.

Impact to Value

- Weak talent pipeline and reduces competitiveness.
- Identified skill gaps affecting strategic execution.
- Increased dependency on key personnel.
- Impact on organizational stability and knowledge continuity.

Key Mitigation Strategies

- Strengthened talent retention and succession planning programs.
- Enhanced remuneration, benefits, and performance-based incentives.
- Expanded learning, reskilling, and leadership development initiatives.
- Maintained open communication through town halls and intranet updates to ensure employee engagement.

Opportunities

- Attract good talent and build stronger talent pipelines.
- Enhance workforce agility through continuous upskilling and leadership succession.
- Strengthen organisational culture and employee loyalty.

Risk Movement

The human capital risk profile increased during the year due to heightened competition for skilled professionals, increased employee mobility, and intensified market demand for specialized capabilities. In response, the Group has strengthened its talent management, retention, and development strategies to mitigate attrition risk and sustain organizational capability.

MANAGEMENT DISCUSSION AND ANALYSIS KEY RISKS & MITIGATION

Third-Party Risk

Risk Trend



Stable

Risk Description

Third-party risk arises from the Group's reliance on external vendors, service providers, and partners to support critical business functions, technology platforms, and operational processes. The involvement of third parties in key activities exposes the Group to risks relating to service performance, system availability, delivery timelines, and operational continuity.

Impact to Value

- Disruption to business operations and service delivery.
- Reduced service quality or system availability affecting customer experience.
- Increased operational costs due to remediation, vendor replacement, or contractual disputes.
- Reputational damage.

Key Mitigation Strategies

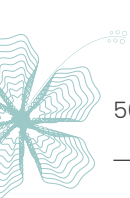
- Maintained a structured third-party risk management framework covering vendor onboarding, due diligence, and ongoing monitoring.
- Maintained ongoing engagement with key vendors and suppliers.
- Performed periodic performance reviews and issue tracking for key vendors.
- Monitored critical suppliers and established new partnerships.
- Enhanced implementation of security controls to mitigate third-party cybersecurity risks

Opportunities

- Improve service reliability through stronger vendor governance and performance management.
- Reduce concentration risk through diversification of critical service providers.
- Strengthen operational resilience and delivery capability.
- Build more effective and accountable vendor partnerships

Risk Movement

The third-party risk profile remained stable during the year, supported by established vendor governance practices, ongoing monitoring of critical service providers, and the absence of material service disruptions arising from third-party performance issues.



MANAGEMENT DISCUSSION AND ANALYSIS KEY RISKS & MITIGATION

Environmental, Social and Governance (ESG) Risk

Risk Trend



Stable

Risk Description

ESG risk relates to the Group’s exposure to environmental, social, and governance matters that may affect regulatory compliance, operational sustainability, stakeholder confidence, and long-term business performance. This includes risks arising from sustainability regulations, workforce practices, data privacy and ethics, supply chain standards, and corporate governance requirements.

Impact to Value

- Lower ESG ratings and reputational risk.
- Negative media exposure.
- Reduced profitability and returns.
- Limited institutional investor interest.

Key Mitigation Strategies

- Maintained ESG governance structures with Board and Management oversight.
- Established short, medium, and long term targets across all material matters.
- Ongoing monitoring of ESG performance and compliance requirements.

Opportunities

- Strengthen stakeholder confidence through consistent ESG practices.
- Enhance corporate reputation and brand value.
- Improve long-term business resilience and sustainability.
- Support access to sustainable financing and partnerships.

Risk Movement

The ESG risk profile remained stable during the year, supported by established governance structures, ongoing compliance with sustainability-related requirements, and consistent monitoring of ESG performance.

MANAGEMENT DISCUSSION AND ANALYSIS OUR GROUP'S STRATEGIES AND PERFORMANCE REVIEW

Recognising the growth potential of the credit reporting and data intelligence industry in ASEAN, we remained focused in FY2025 on sustainable expansion through deeper market penetration, increased wallet share, and active engagement with the region's rapidly growing digital economy.

In FY2025, we continued to execute against the five strategic focus areas established in our 2024 Annual Report, which guided our efforts to grow our core business, expand internationally, deepen customer relationships, leverage the digital ecosystem, and harness Group-wide synergies. Our performance reflects the discipline and consistency with which the organisation executed through a year of deliberate investment and leadership transition.

To drive long-term value, we continued to enhance our product suite, increase recurring revenue, strengthen Group synergies, and deploy advanced digital solutions and analytics. With a strong pipeline of opportunities and a sizeable addressable market, we remain well-positioned to scale our presence and capture the expanding market potential across Malaysia and ASEAN.

CTOS' 2025 STRATEGIC FOCUS AREAS

To be ASEAN's leading credit reporting agency

To make Malaysia the centre of excellence for credit reporting in ASEAN



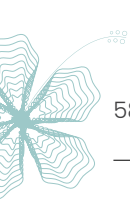
Continuing to grow core business

Expanding International operation

Strengthening Customer Lifetime Journey

Leveraging the Digital Ecosystem

Harnessing Group-wide Synergies



MANAGEMENT DISCUSSION AND ANALYSIS OUR GROUP'S STRATEGIES AND PERFORMANCE REVIEW

OUR 2025 STRATEGIC PROGRESS

Continuing to Grow Core Business

What It Means

We continued to pursue growth through deeper market penetration, expanded wallet share, and end-to-end credit intelligence solutions supported by our comprehensive database of banking, non-banking, and alternative data.

Priority Areas

- Onboard new customers across diverse industries and increase product activation.
- Maximise wallet share and drive revenue growth through analytics and digital solutions.
- Maintain market leadership in Malaysia while continuing to scale across the region.

Achievements / Developments

- Group revenue grew 7.0% to RM326.1 million. Decision Analytics revenue grew 20.1% to RM135.3 million, the Group's largest product category.
- Key Accounts (Malaysia) segment delivered RM116.9 million (+5.1%), with higher adoption of analytical solutions and digital bank volume acceleration.
- Direct-to-Consumer delivered 42.8% revenue growth to RM37.9 million, achieving seven consecutive quarters of sequential growth.
- Digital Solutions adoption expanded across digital banks, Non-Bank Financial Institution, and large corporates.

Outlook

- Revenue Expansion: Deepen coverage and revenue across all business segments, with particular emphasis on Decision Analytics and embedded decisioning.
- Market Penetration: Maintain leadership in Malaysia while expanding coverage to new financial institution clients
- Upselling & Cross-Selling: Capitalise on significant opportunities to deepen wallet share, particularly in analytics and digital solutions.

Material Matters:



Stakeholders:



Capitals:



UNSDGs:



Expanding International Operations

What It Means

Our expansion abroad continued to gain momentum, with proprietary telco-based scoring products gaining strong market acceptance and client diversification progressing into multifinance and banking sectors.

Priority Areas

- Accelerate client acquisition and product adoption abroad, expanding beyond FinTech into banking and multifinance.
- Scale proprietary higher-margin products and expand alternative data partnerships.

Achievements / Developments

- Key Accounts (International) segment delivered RM46.1 million (+17.5%), contributed 14.1% of Group revenue.
- 100% telco data coverage in both Indonesia and the Philippines.
- Delivered first FICO score implementations in the Philippines in partnership with established local credit bureau clients.
- Client base grew to 120+ across both markets, with expansion into multifinance and banking sectors.

Outlook

- Sustainable Growth: International Business segment expected to show sustainable growth and positive contributions, strengthening value proposition by leveraging additional datasets.
- Beyond FinTech: Expand client mix into multifinance and banking sectors
- Alternative Data Leadership: Deepen telco and alternative data partnerships to enhance credit evaluation capabilities and introduce new margin-accretive products

Material Matters:



Stakeholders:



Capitals:



UNSDGs:



MANAGEMENT DISCUSSION AND ANALYSIS OUR GROUP'S STRATEGIES AND PERFORMANCE REVIEW

Strengthening Customer Lifetime Journey

What It Means

Deepening engagement with customers at every stage of their interaction with CTOS, delivering tailored solutions that enhance customer satisfaction, loyalty, and lifetime value.

Priority Areas

- Enhance customer engagement and service accessibility across all touchpoints.
- Increase retention and monetisation by enabling customers to fully leverage CTOS' data and solutions.
- Optimise upselling and cross-selling opportunities to existing customers.

Achievements / Developments

- Key Accounts maintained recurring revenue above 90% of segment revenue, reflecting deeply embedded product usage.
- Launched credit monitoring free trial and business credit reports for consumers, improving trial-to-paid conversion.
- Commercial segment maintained focus on customer acquisition and retention, with churn rates within low single-digit range.

Outlook

- Revenue Growth & Wallet Share: Deepen engagement with existing clients through enhanced analytics, compliance, and fraud intelligence products to increase annual recurring revenue per account.
- Consumer Engagement: Build on the 5 million registered user base through personalised financial health journeys and subscription services.
- Service Penetration: Continue to improve end-to-end client service delivery, positioning CTOS as the trusted partner across the full credit lifecycle.

Material Matters:



Stakeholders:



Capitals:



UNSDGs:



Leveraging the Digital Ecosystem

What It Means

The expansion of digital banks, embedded finance platforms, and the broader digitalisation of financial services continues to create significant growth opportunities. CTOS is positioned to serve as the embedded intelligence layer across Malaysia's evolving digital credit ecosystem.

Priority Areas

- Deepen integration with Malaysia's digital banking ecosystem, enabling real-time credit data across digital origination workflows.
- Enhance AI-driven analytics capabilities for real-time credit assessment and fraud detection.
- Accelerate cloud infrastructure and platform modernisation to support scalable, API-first service delivery.

Achievements / Developments

- 60% of licenced Malaysian digital banks integrated.
- Initiatives to drive higher adoption of advanced digital and analytical solutions are gaining traction and are being scaled.
- Accelerated implementation of cloud infrastructure migration in Q4 2025, building a cloud-native, API-first architecture.
- AI adopted in key internal workflows, improving data quality, processing speed, and operational efficiency.

Outlook

- Digital Bank Monetisation: As digital bank loan volumes accelerate, demand for analytics, scoring, and portfolio monitoring solutions is expected to grow proportionately.
- Expanding Digital Services: Strengthen capabilities in real-time credit decisioning and modular API delivery.
- Platform Modernisation: Continue platform investment in AI-powered workflows and API marketplace infrastructure.

Material Matters:



Stakeholders:

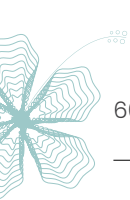


Capitals:



UNSDGs:





MANAGEMENT DISCUSSION AND ANALYSIS OUR GROUP'S STRATEGIES AND PERFORMANCE REVIEW

Harnessing Group-wide Synergies

What It Means

Harnessing synergies across CTOS' subsidiaries, regional operations, and associate companies enables economies of scale, product cross-selling, and accelerated market expansion. Optimising the Group's capital allocation and portfolio discipline is integral to this pillar.

Priority Areas

- Deepen collaboration with JurisTech to deliver integrated end-to-end credit lifecycle solutions.
- Optimise the Group's associate portfolio, allocating capital toward highest strategic return businesses.
- Strengthen operational foundations through disciplined cost management and continued ESG progress.

Achievements / Developments

- Associates' contribution reached RM36.3 million, up 18.5% year-on-year.
- Completed disposal of 26% equity interest in Experian Information Services (Malaysia) on 18 December 2025 for RM80.0 million (reported as discontinued operation; gain of RM17.9 million).
- Undertook general cost and resource optimisation exercises operating discipline.

Outlook

- Associate Partnerships: Deepen collaboration with JurisTech and RAM Holdings for joint product development and strategic account management.
- Capital Discipline: Continue to optimise the Group's portfolio, ensuring capital is allocated toward businesses delivering the highest long-term strategic and financial returns.
- Operational Leverage: Translate cost discipline investments into improved operating leverage as the Group's revenue mix continues to shift toward higher-margin analytics and digital solutions.

Material Matters:



Stakeholders:



Capitals:



UNSDGs:



SETTING OUR STRATEGIC DIRECTION FOR 2026 AND BEYOND

With the appointment of Ankur Sehgal as Group Chief Executive Officer with effect from 16 January 2026, CTOS enters a new chapter in its strategic evolution. The incoming GCEO has assessed the structural forces reshaping the financial ecosystem, including the acceleration of AI-led credit decisioning, the expansion of embedded finance, the formalisation of new credit markets under the CCA 2025, and the persistent gap in credit access for SMEs and thin-file consumers, and has developed a refreshed strategic framework to guide the Group's direction from FY2026.

The new framework repositions CTOS' long-term ambition from being Malaysia's leading credit bureau to becoming the trusted intelligence platform behind every credit and financial transaction in the markets we serve. CTOS is uniquely positioned at the centre of this transition, with more than 30 years of data, a deeply embedded client ecosystem, and a growing regional footprint. The refreshed strategy is structured around five pillars. These pillars will be detailed in the FY2026 Annual Report.

STRATEGIC PILLARS — FY2026 ONWARDS

Trusted Intelligence Behind Every Transaction

Intelligence Leadership

Own the Intelligence Layer

Credit Ecosystem & Expansion

From Reports to Embedded Decisions

Digital Experience & Platform

Unified Intelligent Platform

Financial Inclusion & Empowerment

Expand Access to Underserved

Operational Excellence & Governance

Scale with Integrity

MANAGEMENT DISCUSSION AND ANALYSIS

BUSINESS REVIEW

CTOS navigated FY2025 with resilience, delivering revenue growth of 7.0% year-on-year to RM326.1 million. Group revenue growth was led by the Key Accounts (Malaysia) segment, which grew 5.1% to RM116.9 million, and the Direct-to-Consumer segment, which grew 42.8% to RM37.9 million. Key Accounts (International) delivered RM46.1 million, up 17.5%. The Commercial segment recorded RM125.2 million, reflecting a 2.1% year-on-year decline primarily due to lower bulk data sales in the first half and certain timing effects on commercial deals.

Gross profit of RM221.5 million was broadly flat year-on-year (+0.2%), with gross profit margin moderating to 67.9% from 72.5% in FY2024, reflecting higher cost of sales as the Group invested in platform development and talent. Normalised PATAMI was RM88.1 million, excluding the gain on disposal of Experian Information Services (Malaysia) of RM17.9 million (reported as a discontinued operation), computer software impairment of RM2.7 million, non-recurring items from share of profits of associates, and the cost optimisation exercises. The Group remains cautiously optimistic and firmly committed to disciplined growth, strong execution, and the delivery of sustainable long-term shareholder value.

WHAT WE DO

CTOS drives the digital economy by equipping financial institutions, businesses, and individuals with the intelligence to make confident credit and digital decisions. We operate across four business segments: Key Accounts, Commercial, Direct-to-Consumer (D2C), and International. Our solutions are organised across four product lines (Data & Information, Digital Solutions and Analytics & Intelligence) spanning the full credit and risk management lifecycle.

Banks, Non-Bank Financial Institution, digital banks, insurers, telcos, large corporations, SMEs, statutory bodies, and individual consumers rely on CTOS data, scores, and decisioning tools to assess creditworthiness, manage portfolio risk, verify identity, and combat financial fraud. Each business segment offers tailored solutions:

KEY ACCOUNTS - MALAYSIA



- CCRIS
- Non-Bank Bureau
- KYC
- UBO
- e-Trade Reference (eTR)
- Business Reports
- Portfolio Scrubs, Score
- Benchmarking
- Affordability Index
- Credit Application Decisioning
- eKYC
- IDGuard
- Compliance Platform

COMMERCIAL



- Credit Manager
- Monitoring
- e-Trade Reference (eTR)
- Business Reports
- Compliance

KEY ACCOUNTS - INTERNATIONAL

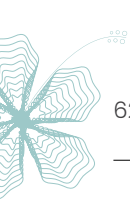


- Score
- Monitoring
- Credit Application Decisioning

DIRECT-TO-CONSUMER (D2C)



- Score
- Monitoring
- CTOS SecureID
- Business Reports



MANAGEMENT DISCUSSION AND ANALYSIS BUSINESS REVIEW

CREATING STAKEHOLDER VALUE

We deliver trusted data intelligence that helps businesses and consumers make better financial decisions. By combining comprehensive data assets, advanced analytics, and responsible governance, we create enduring value across every stakeholder relationship

Stakeholder Expectations	What We Did in FY2025	Results
<p>Large Corporations and SMEs: Reliable credit intelligence and risk tools to support sound lending and proactive credit risk management.</p>	<ul style="list-style-type: none"> • Deployed new predictive risk models • Secured fraud solution contracts • Launched new compliance and analytics products with leading FIs. • 60% of digital banks integrated 	<ul style="list-style-type: none"> • Key Accounts full-year revenue RM163.0 million (+8.4% YoY). • Decision Analytics revenue grew 20.1% to RM135.3 million. • Recurring revenue above 90%, reflecting high client retention and embedded product usage.
<p>Consumers: Accurate credit information and financial health tools, supported by education resources to enhance financial literacy.</p>	<ul style="list-style-type: none"> • Continued financial literacy engagement through roadshows and government-partnered campaigns. • D2C segment continued to engage approximately 16 million credit-active consumers through partnerships and targeted campaigns. 	<ul style="list-style-type: none"> • CTOS ID registered user base surpassed 5.0 million. • D2C segment achieved seven consecutive quarters of sequential revenue growth. • D2C full-year revenue RM37.9 million (+42.8% YoY) – fastest-growing segment in FY2025.
<p>Government and Regulatory Authorities: Strict regulatory compliance, industry collaboration, and contribution to governance and financial inclusion standards.</p>	<ul style="list-style-type: none"> • Maintained ISO/IEC 27001:2022 certification through independent annual audit. • Progressed NSRF and IFRS S1/S2 sustainability disclosure alignment. • Engaged regulators through industry dialogues on credit reporting governance and CCA 2025 implementation. 	<ul style="list-style-type: none"> • FTSE4Good score of 4.2 (four-star ESG rating) achieved. • No material regulatory breaches or data security incidents in FY2025. • Maintained leadership in regulatory compliance, reinforcing trust within the credit reporting ecosystem.
<p>Investors and Shareholders: Sustainable financial returns, transparent reporting, and proactive communication to maintain confidence and trust.</p>	<ul style="list-style-type: none"> • Conducted quarterly investor briefings with full financial and operational disclosure. • Completed disposal of 26% equity interest in Experian Malaysia on 18 Dec 2025 (RM80.0 million; discontinued operation). • Declared total FY2025 dividends of 2.70 sen per share (four interim dividends). • Executed share buyback programme: 34.9 million shares repurchased; 19.5 million cancelled. 	<ul style="list-style-type: none"> • Full-year revenue RM326.1 million (+7.0%); exceeded guided range. • Normalised PATAMI RM88.1 million; normalised to exclude EIS disposal gain, non-recurring associate items, and right-sizing exercise. • Associates' contribution RM36.3 million (+18.5% YoY). • Group borrowings reduced to RM104.1 million from RM165.0 million at FY2024 year-end.

MANAGEMENT DISCUSSION AND ANALYSIS BUSINESS REVIEW

KEY ACHIEVEMENTS

KEY ACCOUNTS (MALAYSIA)



- Full-year Key Accounts revenue of RM163.0 million, up 5.1% year-on-year (RM150.4 million in FY2024), with growth driven by Decision Analytics and continued adoption of digital solutions.
- Decision Analytics was the Group's strongest product category, with full-year revenue of RM135.3 million, up 20.1% year-on-year, driven by rising demand for portfolio analytics, credit scoring, and AI-driven risk tools.
- Completed onboarding 60% of licenced Malaysian digital banks. Initiatives to increase adoption of the Group's advanced digital and analytical solutions are gaining traction and will continue to be scaled.
- Completed disposal of the entire 26% equity interest in Experian Information Services (Malaysia) on 18 December 2025 for RM80.0 million, realising a gain of RM17.9 million.

COMMERCIAL



- Served over 22,000 active commercial clients across wholesale and retail trade, manufacturing, professional services, construction, finance, and insurance.
- Full-year Commercial revenue was RM125.2 million, a 2.1% decline year-on-year (RM128.0 million in FY2024), primarily due to lower bulk commercial data sales in the first half and reduced volumes from certain international commercial clients.
- Commercial segment maintained focus on customer acquisition and retention, driving deeper usage of enhanced credit solutions for improved business decision-making.
- Business Information revenue, which includes commercial credit reports and bulk data, was RM100.7 million, moderating 4.7% from RM105.7 million in FY2024.
- Churn rates remained in the low single-digit range, reflecting the utility and stickiness of core credit products.

DIRECT-TO-CONSUMER (D2C)

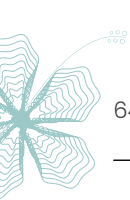


- D2C was the fastest-growing segment in FY2025, with full-year revenue of RM37.9 million, up 42.8% year-on-year (RM26.5 million in FY2024).
- Achieved seven consecutive quarters of sequential revenue growth.
- Launched credit monitoring free trial (May 2025) and business credit reports for consumers (June 2025), expanding the product range.
- D2C segment continued to deliver healthy growth, supported by new product launches, embedded partnerships, and the planned launch of a revamped mobile application in 2026.
- Continued financial literacy engagement through roadshows, campaigns, and government-partnered initiatives, reaching approximately 16 million credit-active consumers in Malaysia.

KEY ACCOUNTS (INTERNATIONAL)



- International segment delivered full-year revenue of RM46.1 million, up 17.5% year-on-year (RM39.2 million in FY2024), with segment profit rising 48.1% to RM6.9 million.
- Maintained 100% telco data coverage in both Indonesia and the Philippines. International contributed 14.1% of Group revenue in FY2025.
- Delivered first FICO score implementations in the Philippines in partnership with established local credit bureau clients.
- Client base grew to 120+, with expansion into multifinance and banking sectors beyond initial FinTech concentration.
- International Business segment is expected to show sustainable growth and positive contributions to the Group's financial performance.



MANAGEMENT DISCUSSION AND ANALYSIS BUSINESS REVIEW

OUTLOOK AND PROSPECTS

KEY ACCOUNTS (MALAYSIA)



Demand from banks, Non-Bank Financial Institution, telcos, and large corporations remains strong. Initiatives to increase adoption of the Group's advanced digital and analytical solutions are gaining traction and will continue to be scaled. The Consumer Credit Act 2025 (CCA 2025) expands the addressable market by formalising new categories of lenders that will require credit intelligence and decisioning infrastructure.

The Group is accelerating investments in AI and advanced analytics solutions to drive sustainable revenue growth and margin expansion, while strengthening its core credit, risk, and data intelligence capabilities. To support scalable expansion and service reliability, the Group will continue increasing its focus on enhancing technology infrastructure and security.

COMMERCIAL



The Commercial segment remains focused on customer acquisition and retention, while driving deeper into the usage of enhanced credit solutions to support improved credit decision-making for Malaysian businesses. SMEs are the backbone of Malaysia's economy, and CTOS is committed to its role as the trusted credit intelligence partner for this segment.

The Group continues to actively evaluate synergistic partnerships and selective acquisition opportunities across Malaysia and ASEAN, while deepening collaboration with associate companies to enhance performance and efficiency.

DIRECT-TO-CONSUMER (D2C)



The Direct-to-Consumer segment continues to deliver healthy growth, supported by new product launches, embedded partnerships, and the revamped mobile application planned for launch in 2026. The refreshed consumer platform will deepen engagement across the Group's growing registered user base.

The Group continues to drive financial literacy awareness through partnerships. Overall, the Group remains firmly committed to disciplined growth, strong execution, and the delivery of sustainable long-term shareholder value.

KEY ACCOUNTS (INTERNATIONAL)



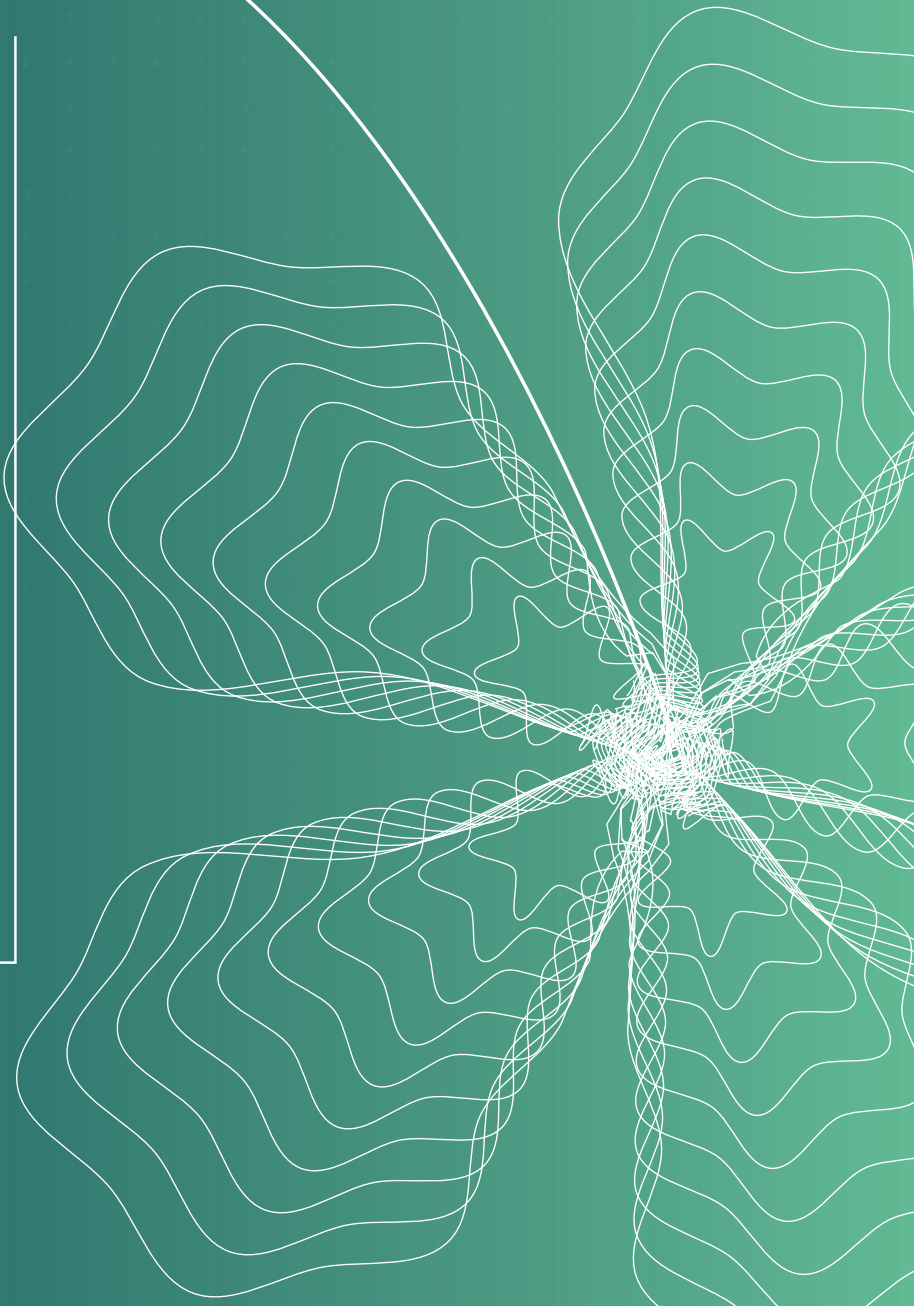
The International Business segment is expected to show sustainable growth and positive contributions to the Group's financial performance. The business is strengthening its value proposition by leveraging additional datasets, with the strategic objective of becoming a leading provider of alternative data credit solutions across ASEAN.

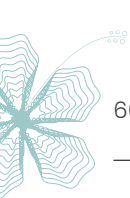
FinScore serves markets where more than 60% of the population lacks traditional credit bureau records. The Group will continue expanding beyond the FinTech sector into multifinance and banking, leveraging its 100% telco data coverage.

SECTION 6

SUSTAINABILITY STATEMENT

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SUSTAINABILITY STATEMENT ABOUT THIS SECTION

We are proud to present the Sustainability Statement for CTOS Digital Berhad (“CTOS Digital” or “the Company”) and its subsidiaries (“CTOS” or “the Group”) for the financial year ended 31 December 2025.

This Statement offers a comprehensive view of our efforts to deliver long-term positive impacts across our business units, operations, and the communities we serve. It reflects our journey so far, highlighting the initiatives undertaken, challenges faced and achievements in advancing our Sustainability Blueprint. Our focus remains aligned on fostering continuous improvement, championing a transition to a low-carbon economy, and safeguarding our planet and our people.

REPORTING PERIOD, SCOPE, FREQUENCY AND BOUNDARY

This Sustainability Statement (SS) encompasses all entities within the CTOS Group, including subsidiaries as well as internal and external stakeholders. We streamline the scope of our SS to align with the scope of our integrated and financial reporting, ensuring a consistent and comprehensive approach.

The statement details CTOS’ sustainability strategy, initiatives, and performance for the period from 1 January to 31 December 2025. We focus on our business operations in Malaysia under the Group’s principal subsidiaries, addressing critical issues identified through a thorough materiality assessment. Associates and international subsidiaries are not included in the scope of this report.

We have strived to present a detailed account of all material issues impacting the Group. This SS includes both qualitative and quantitative outcomes for the indicators discussed unless stated otherwise.

Reporting Frameworks

This report was developed to the following standards, guidelines and best practices:

- International Integrated Reporting Council’s (IIRC) Integrated Reporting <IR> Framework
- Bursa Malaysia Main Market Listing Requirements (MMLR)
- Securities Commission Malaysia Malaysian Code on Corporate Governance (MCCG)
- Malaysian Financial Reporting Standards (MFRS)
- Bursa Malaysia’s Sustainability Reporting Guide
- FTSE4Good Bursa Malaysia (F4GBM) Index
- Global Reporting Initiative (GRI) Sustainability Reporting Standards
- United Nations Sustainable Development Goals (UN SDGs)
- Companies Act 2016
- Credit Reporting Agencies (CRA) Act 2010
- ISO 26000 Guidance on Social Responsibility
- ISO 27001 Information Security Risks
- ISO 31000 Risk Management Guidelines

ASSURANCE

This Statement has been reviewed by CTOS’ Internal Audit, and has been approved by CTOS’ Board, to ensure the accuracy and integrity of our disclosures.



INTEGRATED ANNUAL REPORT (IAR) 2025

SUSTAINABILITY STATEMENT

OUR SUSTAINABILITY PROGRESS

In 2025, we have made progress toward advancing our sustainability purpose, focusing our efforts to create impact where it matters most to our stakeholders.

EMPOWERING PROGRESS & RESILIENCE



Average monthly visitors to the Knowledge Base site:
2.7 million
(2024: 2.6 million)

Total community investment:
RM333,109
(2024: RM307,489)

Net Promoter Score (NPS):
15.1
(2024: 23.1)

Data breach cases:
Zero for three consecutive years

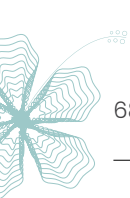
NURTURING EMPLOYEE GROWTH



Female representation in senior leadership:
41%
(2024: 29%)



Incident of discrimination:
Zero



SUSTAINABILITY STATEMENT OUR SUSTAINABILITY PROGRESS

ACTING WITH INTEGRITY

Employees Trained on ABAC:
100%

Incidents of Corruption:
ZERO

Proportion of spending on local suppliers:
84.9%
(2024: 83.9%)



DRIVING ENVIRONMENTAL RESPONSIBILITY



Scope 1 GHG emissions:
ZERO
(2024: ZERO)

Scope 2 GHG emissions:
249.00 tCO₂e
(2024: 301.25 tCO₂e)



SUSTAINABILITY STATEMENT

WHAT SUSTAINABILITY MEANS TO US

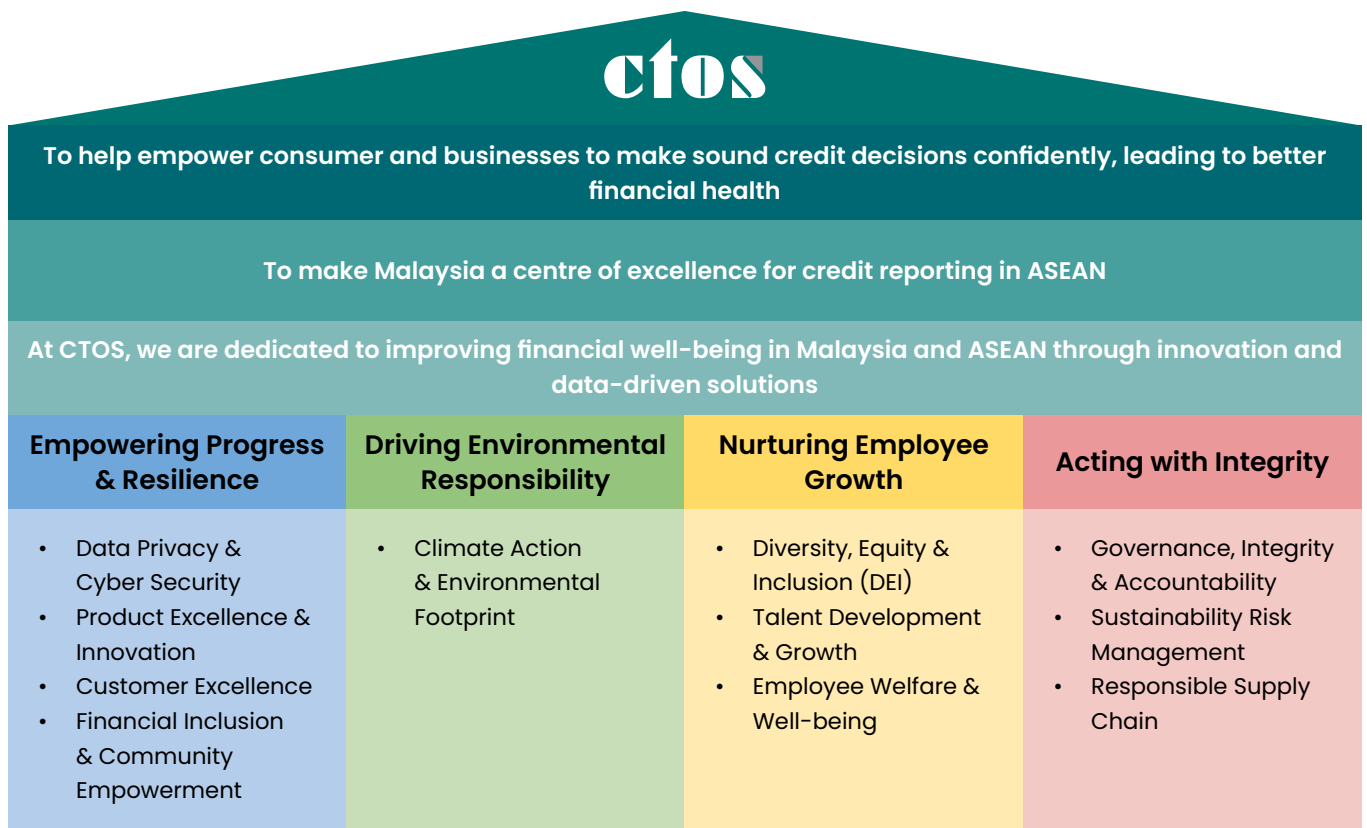
OUR SUSTAINABILITY APPROACH

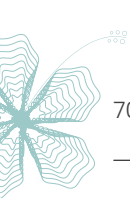
At CTOS Digital, sustainability is not a standalone initiative. It is fundamental to how we build trust, protect data integrity and enable equitable financial access across Malaysia and ASEAN. We recognise that our role as a Credit Reporting Agency (CRA) goes beyond information provision; it carries a responsibility to ensure that our systems, services and growth are inclusive, ethical and resilient.

Sustainability Blueprint

We have enhanced and updated the CTOS Sustainability Blueprint which translates our business responsibilities as data intelligence and digital solutions provider into clear priorities and actions. It guides how we integrate responsible data practices, strong governance and social impact considerations into strategy and decision-making.

Structured around four sustainability pillars, the Blueprint connects financial well-being, data responsibility, employee accountability and strong governance. The Blueprint also supports our ambition to promote financial well-being while ensuring responsible and ethical growth. Aligned with the United Nations Sustainable Development Goals (UN SDGs) and Malaysia’s national sustainability priorities, our initiatives are strategically focused on generating measurable impact for both our business and society.





SUSTAINABILITY STATEMENT

WHAT SUSTAINABILITY MEANS TO US

Sustainability Roadmap

The CTOS Sustainability Roadmap focuses on areas where the Group has clear influence and the ability to track progress over time. Guided by our material matters, we prioritise measurable indicators that can be monitored and managed through existing business and risk management processes.

The development of the roadmap draws on collaboration with key internal departments through the 2025 target-setting exercise. This process resulted in phased targets and goals under each sustainability pillar, providing a structured framework to guide progress over the short, medium and long term.

The Sustainability Roadmap adopts a phased approach to reflect three levels of sustainability maturity:

 <p>INCREMENTAL TARGETS (2026–2028)</p> <p>Focus on strengthening foundations, including sustainability governance, responsible corporate practices and implementations.</p>	 <p>PROGRESSIVE TARGETS (2029–2039)</p> <p>Emphasise the integration and scaling of sustainability practices across the business with stronger internal controls and performance management.</p>	 <p>TRANSFORMATIVE TARGETS (2040 & BEYOND)</p> <p>Reflect advanced maturity, where sustainability considerations align with global frameworks and evolving regulatory expectations.</p>
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Sustainability Policy

In 2025, we continued to develop the Group Sustainability Policy to formalise our approach toward sustainable business practices. It will establish a formal governance framework to integrate sustainability considerations into Group-wide decision-making and business activities. The policy will set out our responsibility as a credit reporting agency to identify and manage sustainability-related risks in support of a responsible credit reporting ecosystem. We target to establish this policy which will serve as a guideline for implementation in 2026. Key features guiding the development includes:

- **Clear governance & oversight:** define roles and responsibilities across the Board, Senior Leadership Team and management, with ongoing review to ensure alignment with regulatory expectations, stakeholder priorities and long-term objectives.
- **Integration into business & operational processes:** embed sustainability into strategy, risk management, performance monitoring and decision-making, aligned with existing governance and compliance frameworks.
- **Group-wide applicability with phased implementation:** implement progressively across the Group, tailored to local regulatory requirements and operational readiness.
- **Risk-based focus on sustainability-related risks and opportunities (“SROs”):** identify and manage SRO risks relevant to CTOS’ role as a credit reporting agency.








SUSTAINABILITY STATEMENT

WHAT SUSTAINABILITY MEANS TO US

Membership & Associations

CTOS participates actively in key industry associations, engaging with regulators and market participants on data governance, regulatory expectations and responsible industry standards that underpin trust and stability in the financial ecosystem.

<p>MEMBER</p> 	<p>MEMBER</p> 	<p>CORPORATE PARTNER</p>  <p>Corporate Sponsors:</p> 
<p>PARTNER - 2025 BIIA CONFERENCE</p>  <p>BIIA Digital Finance and Commerce in the 4th Industrial Revolution</p>	<p>STRATEGIC PARTNER</p> <p>Digital & AI Business War 2026</p>	

Our Commitments to the UN SDGs

CTOS Digital supports the UN SDGs where they align with our role in the financial and credit reporting ecosystem. We focus our efforts on seven of the 17 UN SDGs, selected based on their relevance to our business and stakeholders, our ability to influence positive outcomes through our operations and alignment with national priorities.

Our role in the financial and credit reporting ecosystem gives us a unique opportunity to support the UN SDGs. Rather than spreading our efforts thin, we focus on seven specific areas where our day-to-day work can make a real difference for our customers, our partners, and the wider community. These goals were chosen because they reflect the practical impact of our business and stay true to our national priorities.

Our work starts with SDG 4: Quality Education, where we help people and businesses better understand their credit health and financial responsibilities. By providing this clarity, we support SDG 8: Decent Work and Economic Growth, ensuring that lending stays responsible and that we continue to create meaningful careers in data and technology. A core part of this is SDG 10: Reduced Inequalities; by making credit information more accurate and accessible for SMEs and individuals, we help more people participate in the formal economy who might otherwise be left behind.

On the operational side, we look at SDG 12: Responsible Consumption and Production by simply being smarter with how we use our tech and resources to keep waste down. We also stay mindful of SDG 13: Climate Action, keeping a close eye on how environmental shifts might affect our data centres and the people who rely on our services.

Everything we do is built on a foundation of SDG 16: Peace, Justice and Strong Institutions, where our main priority is protecting personal data and individual rights to keep the financial system fair and accountable. Finally, through SDG 17: Partnerships for the Goals, we work side-by-side with regulators and industry peers to tackle the bigger challenges in our sector and raise the bar for everyone.





SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

DATA PRIVACY & CYBER SECURITY

As custodian of citizens' personal information and sensitive business data, we are responsible for protecting its integrity, confidentiality and availability. A breach would erode trust, disrupt the financial ecosystem and impact livelihoods.

Our Approach

Staying ahead of cyber threats is about more than just software—it is about protecting the trust our customers place in us every day. Our approach to cyber security and data privacy is proactive and forward-thinking, ensuring our digital ecosystem remains a safe space for everyone.

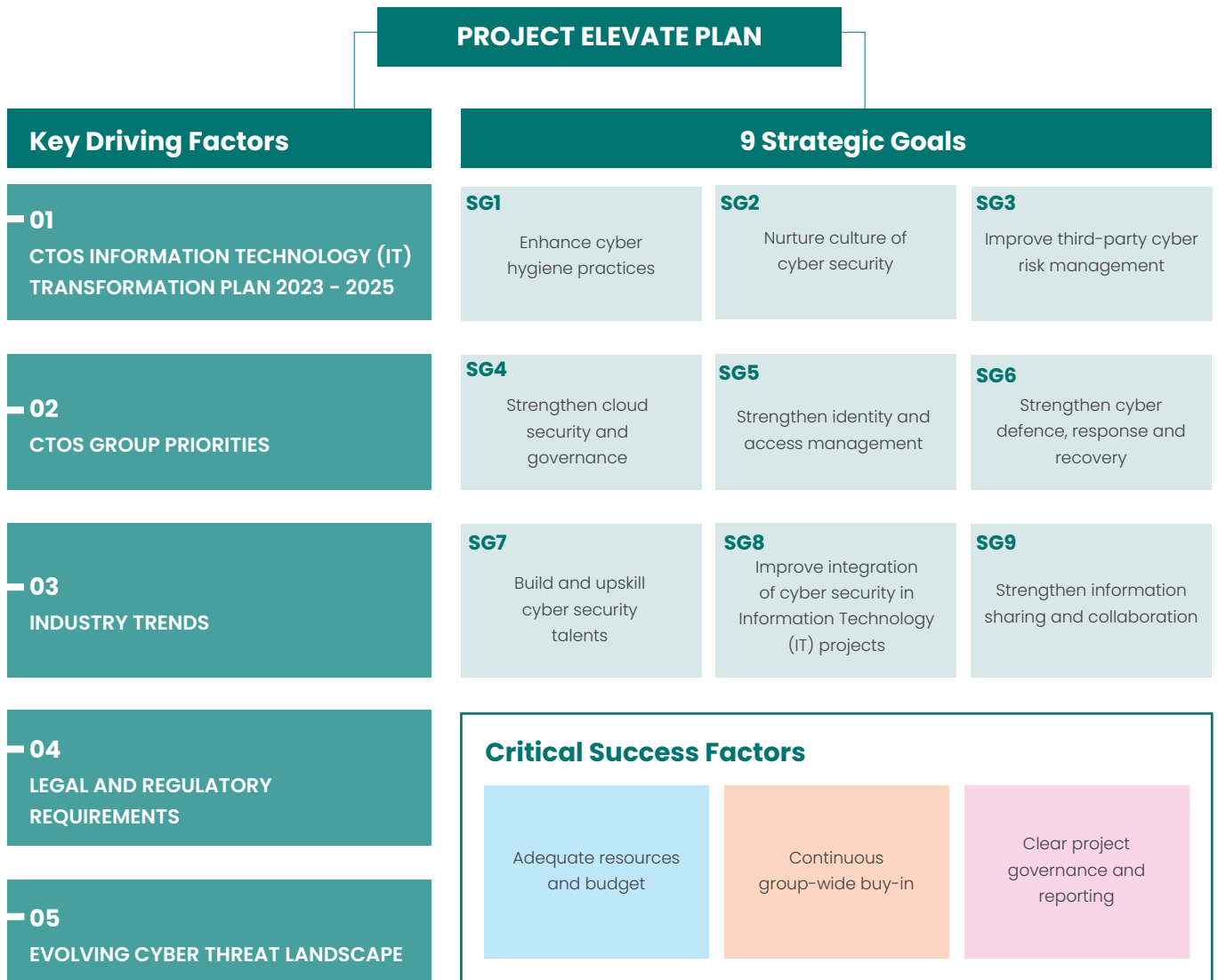
A major part of this approach has been Project Elevate, a three-year initiative launched in January 2023 and completed in 2025. Throughout 2025, this project served as the foundation of our security strategy. With its successful completion this year, we have reached a major milestone in fortifying our defences against an increasingly complex landscape of cyber threats.

Central to this achievement was the establishment of a baseline of controls. By doing so, we have set a clear, mandatory standard of security that applies across every part of our business. This ensures that protection is consistent and that no area of our operations falls below the safety levels our stakeholders expect.

To support these controls, we have reinforced our internal processes, moving toward a culture of continuous oversight. This involves refining how we manage data access, how we monitor for vulnerabilities, and how our teams respond to potential issues. Ultimately, we have put in place security architecture designed to neutralising threats, ensuring that our digital foundation remains a secure and reliable resource for the community we serve.



EMPOWERING PROGRESS & RESILIENCE



In 2025, CTOS completed its three-year cyber security roadmap. The Group maintains alignment with relevant global certification standards and continues to strengthen compliance with BNM RMi requirements through ongoing efforts, industry best practices, and the use of modern security technologies.

Additionally, our cyber security practices are governed by the ISO/IEC 27001:2022 and the NIST Cyber Security Framework 2.0.



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

2025 Programmes & Initiatives

**Non-conformances in ISO 27001 surveillance and BNM CCRIS audits:
Zero**

Responsible Data Stewardship

As digitalisation accelerates, we safeguard customer data through consent management, updated privacy policies and targeted privacy training across the workforce. We also expanded our identity governance framework by integrating internal applications into automated access review processes.

- **Updated internal privacy procedures and policies** to strengthen governance, embedding Privacy by Design (PbD) into product development and change processes.
- **Developing AI-enabled consent automation** to automatically verify customer consents, speeding up compliance checks and minimising errors which will be completed in early 2026.

At the same time, we modernised our web-layer protections with an AI-driven secure web gateway, shielding users from phishing, malware and other web-based threats. Data egress channels, including emails, websites, cloud and endpoints, are covered by strengthened Data Loss Prevention (DLP) controls, which reduces the risk of unauthorised data transmission.

Progress & Impacts:

Customer consent verifications:
100%

New products reviewed under privacy-by-design standards:
6

Data leaving our systems is
safeguarded through DLP controls

Employees trained on privacy responsibilities:
100%

Data breach cases:
Zero for three consecutive years

EMPOWERING PROGRESS & RESILIENCE

Cloud Security Enhancement

Cloud security is central to mitigating emerging cyber risks and safeguarding data privacy. We implemented the AWS Security Improvement Programme (SIP) to enhance the security and resilience of our cloud infrastructure hosted on Amazon Web Services. This programme focused on identifying configuration gaps, strengthening access controls, and applying security best practices to mitigate potential vulnerabilities. Through systematic monitoring and continuous improvement of the AWS cloud environment, we advanced our cyber risk management and ensured that our cloud environment aligns with industry-leading security standards.

To further substantiate the effectiveness of these controls, we conduct annual vulnerability assessments and penetration testing across critical systems and applications to enable early identification and timely remediation of potential security gaps.

Progress & Impacts:

AWS security improvement score:
65% (Global average is 41%)

Security health score:
>90% across production cloud environment



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

Cyber Hygiene & Security Operations

In 2025, the Group continued to optimise core security capabilities to ensure day-to-day operations remain secure. This included enhancing backup and recovery for all internal business data through immutable storage and ransomware protection. These measures minimise risk and allow for the secure restoration of critical information.

For security operations, CTOS initiated a Security Operations Centre (SOC) refresh programme. Leveraging AI and Security Orchestration, Automation, and Response (SOAR), the upgrade enhances threat detection and accelerates incident response. Completion is expected in Q2 2026. We also modernised web-layer security with an AI-driven secure web gateway, protecting users from web-based attacks.

Key benefits include:

- **Earlier threat detection** through AI-driven identification of anomalies and emerging threats.
- **Faster incident response** enabled by SOAR automation, playbooks and orchestration.
- **Higher alert accuracy** with reduced false positives, allowing analysts to focus on genuine threats.
- **Stronger tool integration** across endpoint, network, identity and cloud platforms for a unified operational view.

To support the SOC programme, we strengthened our incident response capabilities by adding retainer services that can respond within service level agreements during major cyber incidents.

Progress & Impacts:

Achieved internal target cyber maturity level:

Achieved Tier 3 level based on NIST Cyber Security Framework (CSF) 2.0.

Server compliance scan rating:

Completed Center for Internet Security (CIS) benchmark compliance scan across all in-scope servers in 2025.

EMPOWERING PROGRESS & RESILIENCE

Risk Monitoring & Metrics Tracking

CTOS monitors key risk and performance metrics to guide impactful security actions. We established two distinct metrics, Key Risk Indicators (KRIs), and Key Performance Indicators (KPIs), to monitor the effectiveness of cyber security initiatives and measure impact. Our monitoring is anchored by ten critical cyber KRIs for Board-level oversight:



These metrics are reviewed and reported to management and Board-level committees, reinforcing governance and oversight of system resilience, access governance and incident preparedness.

Progress & Impacts:

Cyber Risk Rating:
(“A”)

CTOS has maintained “A” cyber risk rating based on assessment by an independent third-party cyber risk rating tool.



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

Security Awareness & Upskilling

Employees who attend cyber security and data privacy training are better equipped to protect sensitive credit information and uphold stakeholder trust. We delivered targeted privacy and regular security training across the workforce to reinforce accountability and strengthen a Group-wide culture of data protection.

i) Information Security Management System (ISMS)

We covered information security policies and controls, risk assessment and treatment processes, data classification and handling, access control, secure use of systems, incident identification and reporting, business continuity and supplier security management. Employees were informed of their individual responsibilities in safeguarding confidential and personal data, including phishing awareness and social engineering risks.

ii) Cyber Awareness Refresher

We refreshed our employees' knowledge on identifying and responding to common cyber threats in a modern work environment. Topics included information security fundamentals, data protection, phishing prevention, remote working security, secure password management, handling security incidents and an overview of internal information security policies.

iii) Onboarding Training

New joiners receive foundational guidance on ethical conduct, compliance expectations and information security responsibilities to ensure early alignment with organisational standards.

Progress & Impacts:

Post-training
assessment scores:

100%*

Employee attendance for cyber
refresher:

97%

Phishing simulation
annual average:

0.85%**

**The score represents the combined results for both the ISMS and ABAC training programmes.*

***Refers to average percentage of employees who clicked on the simulated phishing link.*

Outlook

Looking ahead, the Group remains focused on ensuring the resilience, availability and recoverability of its critical technology and services, providing assurance to customers and stakeholders. We will continue to strengthen preventive controls, detection capabilities and incident response readiness in line with evolving regulatory expectations and a more complex cyber threat landscape.

Following the completion of Project Elevate, the Group will focus on maturing and sustaining the capabilities established, ensuring they remain scalable and aligned with business growth. On the data privacy front, the Group will continue to enhance consent management processes through greater automation, deepen its Privacy by Design approach, and strengthen data retention and lifecycle management practices, supported by ongoing awareness and capability-building initiatives.

To further bolster cybersecurity beyond Project Elevate, the Group is in the process of developing a three-year strategy aimed at building stronger in-house expertise, integrating cybersecurity governance and staying ahead of emerging and sophisticated cyber threats. This will include stronger adoption of advanced security technologies, including automation, analytics, and AI-enabled capabilities, to enhance threat detection, response and overall cyber resilience.

EMPOWERING PROGRESS & RESILIENCE

PRODUCT EXCELLENCE & INNOVATION

Our innovations address evolving customer needs – from credit reporting to digital onboarding and analytics – to help customers and financial institutions assess creditworthiness more effectively and keep CTOS at the forefront of Malaysia’s credit reporting industry.

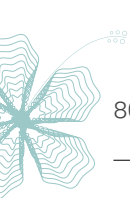
Our Approach

CTOS designs its products around a digital-first, customer-centric strategy that focuses on understanding and addressing customer needs across all segments. Our approach is guided by two key pillars:

<p>Customer-Centric Digital Transformation</p>	<p>Trust & Reliability through Strong Governance</p>
<p>We streamline processes and adopt agile, data-driven product development to enhance efficiency and service delivery. Continuous training and customer feedback ensure solutions remain relevant and responsive to evolving needs.</p>	<p>We embed data security and compliance measures, guided by recognised industry standards, to maintain integrity, safety, and reliability across all customer interactions.</p>

**Translating into
How We Create Targeted Solutions for Our Key
Customer Segments**

<p>Key Accounts:</p>	<p>Commercial (SMEs):</p>	<p>Direct-to-Consumer (D2C):</p>
<p>Enterprise-grade solutions supporting complex risk, compliance and portfolio management needs.</p>	<p>Accessible solutions designed to support SMEs across their business lifecycle, improving decision-making and financing facilitation.</p>	<p>Tools for financial self-management, credit monitoring and literacy, enabling consumers to protect themselves from fraud and enhance their financial well-being.</p>



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

Product Management Lifecycle Framework

CTOS applies a structured Product Management Lifecycle framework to ensure innovations remain customer-centric, secure and fit for purpose – from ideation through to commercialisation and evolution.



EMPOWERING PROGRESS & RESILIENCE

Commercial

We empower Malaysia's small and medium enterprise (SME) sector with timely access to business credit information that strengthens financial decision-making. As we refine our product roadmap, we prioritise solutions that build on our existing data assets and data acquisition plans, extend our services across the value chain and respond to evolving macro trends shaping customer needs and market demand.

CTOS Lite Report Integration

In 2025, we integrated the CTOS Lite Report (business credit report) into partnering platforms, providing SMEs with convenient access to their business credit information through a familiar digital ecosystem. This integration reduces the need for separate registrations and complex procedures, streamlining credit monitoring for small and medium enterprises.

Progress & Impacts:

SMEs accessed business credit reports:

6,100+ within the first three months of launch

Reduction in Onboarding Time:

4.5 mins → < 1 min

Coach Mark

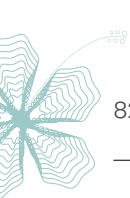
We expanded the functionality of Coach Mark, an integrated assistant within CTOS Credit Manager, to guide SME users through key features and functionalities of the platform. Coach Mark provides step-by-step guidance, supports basic transactions and addresses frequently asked questions, helping SMEs navigate credit management tools more effectively and enhancing overall user experience.

Credit IQ Programme

Through the HRDF-approved Credit IQ Programme, we enabled SMEs to apply their HRDF contributions towards staff training in credit management best practices. The programme equips SMEs with practical knowledge and tools to strengthen credit risk management capabilities and improve financial resilience.

eKYB Sign Up Facility

To streamline SME onboarding, we piloted a digital eKYB sign-up facility for CTOS Credit Manager. The solution extends our e-contract initiative by reducing manual steps and accelerating account activation, making it easier and faster for SMEs to subscribe and get started.



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

D2C

Our product development centres around empowering consumers to understand and improve their credit scores. We leverage customer data and feedback to identify social and environmental challenges across different segments. By monitoring multiple metrics, such as user adoption of Credit Monitoring, engagement with credit reports and frequency of repeat usage, we track the effectiveness of our educational content and improvements in users' credit scores over time, providing insight into the real-world impact of our solutions.

Credit Monitoring Free Trial

CTOS introduced a one-month free trial of its Credit Monitoring service for non-subscribers. This initiative was aimed at lowering entry barriers for first-time users and addressing affordability concerns, while enabling consumers to experience the value of proactive credit monitoring. As a result, we enabled users to receive credit activity notifications and early alerts on potential fraud during the trial period.

Progress & Impacts:**Trial to paid subscription conversion:****23%****Growth in credit monitoring purchasers:****4,732 (May 2025) - 16,611 users (December 2025)****Credit Monitoring Integration with partner**

In May 2025, CTOS launched its Credit Monitoring product on the partner's platform. By embedding credit monitoring within a widely used digital payment ecosystem, this initiative improved convenience and reach, making credit awareness more accessible as part of consumers' everyday financial activities.

Progress & Impacts:**New users onboarded:****>242,000+****Reduction in onboarding time:****2 mins → < 30 secs****Investment in AI-Powered Credit Insights**

We are investing in research and development to strengthen our artificial intelligence and machine learning capabilities. These advancements will support process improvements and product innovation, ensuring our solutions remain responsive, inclusive and socially responsible. Once deployed, these enhancements will enable more personalised credit score analysis and provide users with actionable recommendations to improve their credit standing.

We are currently in the research and development phase.

EMPOWERING PROGRESS & RESILIENCE

Outlook

Looking ahead to 2026, our sustainability strategy will focus on strengthening our solutions through the following priority areas:

Key Accounts

- **Credit Risk Management Suite:** We aim to strengthen core credit decisioning through enhanced bureau scores, attributes and benchmarking tools.
- **Fraud & ID Resolution Suite:** We will enhance existing identity and fraud solutions, including Bank IDGuard and eKYC, and expand into broader verification use cases such as e-verification, non-bank identity solutions and unified Fraud & ID portals.
- **Compliance Management Suite:** We will position compliance as an integrated, ongoing monitoring capability rather than a point-in-time check, while introducing eKYC and enterprise compliance automation to improve operational efficiency.

Commercial (SMEs)

- **Leverage Existing Data and Services:** We aim to enable SMEs to research, prospect and promote their businesses, while providing industry insights, competitive research and market visibility tools.
- **Improve Existing Core Proposition:** We will support better credit discipline through reminders, proactive recovery and improved monitoring tools.
- **Leverage Existing Ecosystem and Build Proprietary Data:** We will build proprietary data for SMEs through financing access, repayment behaviour and transaction insights.

Direct-to-Consumer (D2C)

- **Advanced AI Personalisation:** We will further enhance AI-driven insights to deliver highly personalised credit improvement recommendations. By analysing individual credit profiles, the AI identifies factors contributing to lower scores and provides tailored guidance, from addressing over-utilisation of credit facilities to correcting outdated utility bills listed under CTOS Electronic Trade Reference (eTR), helping consumers strengthen their creditworthiness and make informed financial decisions.
- **Expanded Financial Wellness Tools:** We aim to broaden our suite of financial wellness offerings beyond credit monitoring by introducing integrated tools for budgeting, debt management and financial goal tracking.
- **Enhanced Accessibility:** We will continue investing in inclusive design to improve access for underserved communities, including multilingual support and simplified user interfaces that cater to users with varying levels of digital literacy, ensuring our services remain accessible and user-friendly.
- **Ecosystem Integration:** Through strategic partnerships, we seek to embed CTOS services within a wider range of everyday financial platforms. This will enable credit awareness to become a seamless and integrated part of consumers' regular financial interactions.

Through these focus areas, we aim to evolve credit monitoring from a passive information service into an active financial empowerment tool, supporting Malaysians in achieving stronger financial well-being and long-term financial resilience.



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

CUSTOMER EXCELLENCE

Our customers trust us with their data and we treat that trust as a responsibility. Protecting information and delivering reliable digital services is core to how we operate. As digital ecosystems grow more complex, we strengthen our systems to stay ahead of threats, reduce disruption and keep our services clear, secure and dependable.

Our Approach

We are accelerating our transition from on-premise data centres to a secure, cloud-first architecture to enhance system resilience, scalability and service reliability for our customers. At the same time, CTOS actively identifies and responds to the concerns and challenges faced by our customers through structured engagement and continuous dialogue.

We gather real-time insights across multiple customer touchpoints, including our Sales, Customer Success and Contact Centre teams. These interactions help us understand emerging concerns, operational pressures, regulatory requirements and sustainability-related risks that may affect our customers' businesses.

Customer Engagement & Support Our teams actively engage customers to understand their needs and ensure consistent service delivery across our platforms	
Contact Centre (CC)	Pre-Sales & Product Teams
Provides accessible and responsive support across multiple channels, including voice calls, email and live chat, serving all three customer segments. The team handles customer inquiries, complaints, disputes and feedback. Complex cases requiring further investigation are escalated to the relevant internal stakeholders through Customer Relationship Management (CRM) for resolution.	Conducts discovery workshops with customers to assess pain points, identify gaps in existing solutions and co-develop improvements that enhance customer experience and service delivery.

Service Performance Monitoring

We monitor customer service performance through service level metrics to ensure timely responses and accessible support across all channels. Key performance indicators include:

Inbound call SLA:
Attained 80% SLA
(Service Level Agreement)
requirements.

Email response time:
< 1 business day

Chat & call responses:
Immediate response

Customer-related matters may be escalated internally when necessary to ensure appropriate investigation and resolution.

EMPOWERING PROGRESS & RESILIENCE

Customer Sales Enhancements

Our customers rely on us not only for data, but for insight and guidance they can trust. To strengthen these relationships, we equipped our sales teams to engage customers more confidently and purposefully. Targeted programmes equipped commercial teams with consultative selling, negotiation and customer success skills, improving day-to-day effectiveness and confidence in client interactions.

Key Programmes:

101 CTOS Selling Skills

A foundational sales programme that equips Commercial Sales and Business Development teams with a structured end-to-end sales framework and practical selling techniques to enhance sales effectiveness.

Key Account Management & Negotiations

A skills-based workshop that strengthens strategic account planning, customer engagement and negotiation capabilities to drive sustainable growth of key accounts.

Beyond the Sale: Customer Success Partnership

A two-day workshop that develops Customer Success professionals into trusted advisors by enhancing client partnership strategies, communication skills and proactive issue management.

Sales Conference

An annual sales alignment programme designed to strengthen team cohesion, reinforce a high-performance culture and align the sales force with commercial priorities.

Progress & Impacts:

Number of participants:
309

Average training hours:
24 hours per participant

Consumer NPS score:
15.1

Mobile Application Modernisation

We undertook a full modernisation of our Consumer Mobile Application, replacing a decade-old technology stack with modern, scalable architecture. The revamp includes a refreshed UX/UI design and enhanced report visualisation features to improve the clarity, usability and transparency of credit information.

The upgraded application is scheduled to go live in 2026.

Outlook

Looking ahead, our focus will be on strengthening proactive service strategies, digital enablement and self-service options, while maintaining a customer-first mindset in all aspects of our operations.



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

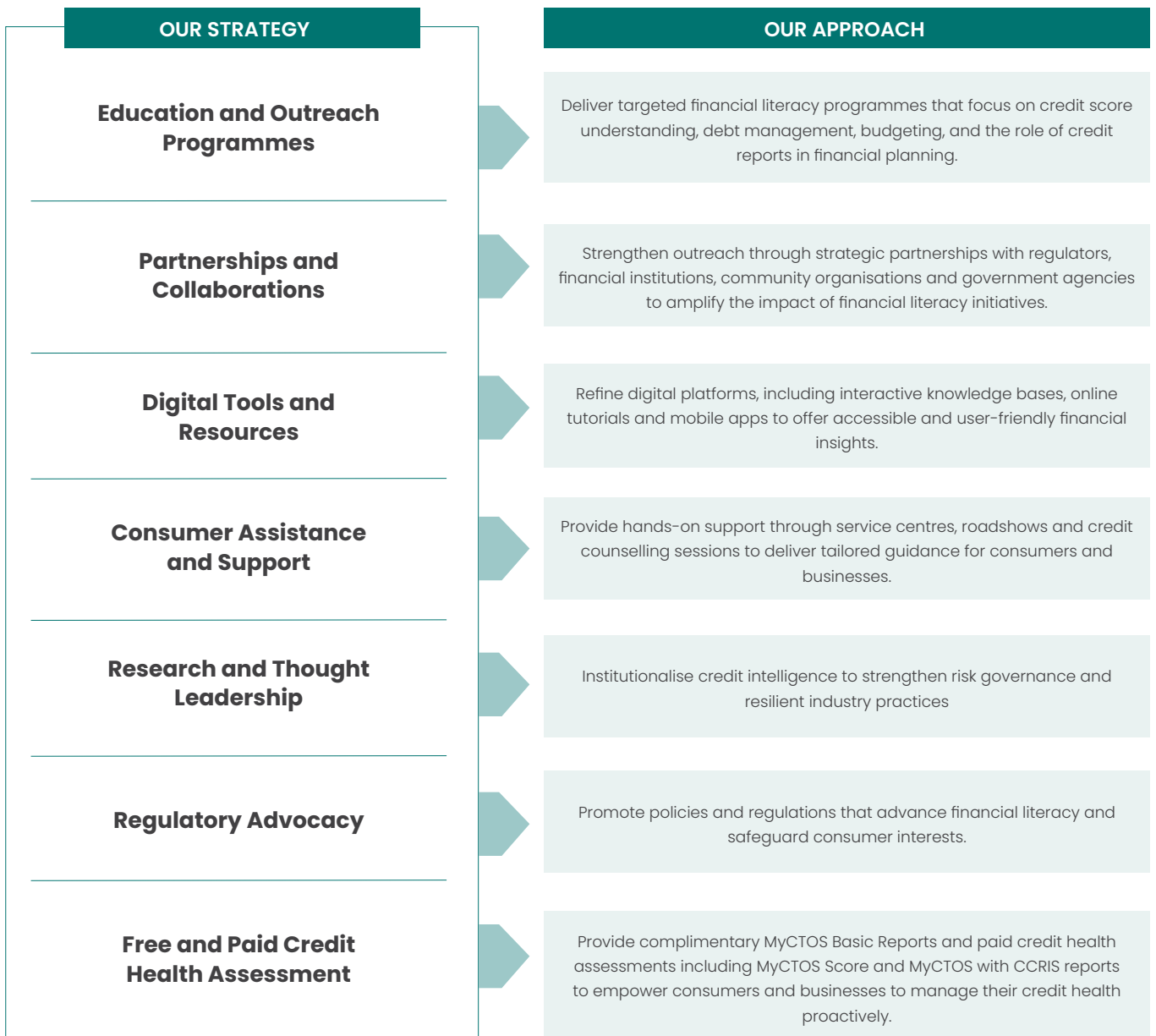
FINANCIAL INCLUSION & COMMUNITY EMPOWERMENT

Financial inclusion is a national priority and central to CTOS’ purpose. Every day, we help individuals, particularly those new to credit or underserved, build financial identities and gain access to fairer opportunities, enabling more informed financial decisions and contributing to a more inclusive financial ecosystem.

Our Approach

Through the CTOS Cares Programme, we implement initiatives aligned with the UN SDGs and Bank Negara Malaysia’s (BNM) Financial Inclusion Framework (2023–2026), equipping communities with practical financial knowledge and delivering targeted education to help individuals and businesses engage responsibly with the financial system.

Guided by the principle that informed communities underpin sustainable economic growth, our five interconnected pillars directly support CTOS’ business priority of fostering a responsible and inclusive credit ecosystem.



EMPOWERING PROGRESS & RESILIENCE

2025 Programmes & Initiatives

CTOS SME Biz Day 2025

Small and medium enterprises (SMEs) play a critical role in economic resilience, yet many face barriers to digital adoption, market access and sustainable growth. To address this gap, CTOS SME Biz Day was designed to strengthen SME capability and resilience by improving access to practical knowledge, trusted networks and digital solutions that empower informed business decision-making. Now in its third consecutive year, the programme reflects CTOS' sustained commitment to building a more resilient and competitive SME ecosystem across Malaysia.



Led by the CTOS for Business division, this nationwide event series equips SMEs to navigate digital transformation, drive innovation and pursue sustainable growth by connecting them with policymakers, industry leaders, technology partners and fellow entrepreneurs. An integral component of Biz Day, the CTOS SME Biz Symposium brings together cross-sector leaders to translate emerging business challenges into actionable insights for SMEs.

In collaboration with partners such as AWS, AutoCount, POS Malaysia, Unifi Business, Samsung and Zoho, participating SMEs gain practical insights into market access, export readiness and business digitalisation, alongside exposure to relevant digital and operational solutions. Public- and private-sector stakeholders, including SME Corp, MATRADE, MDEC and SAMENTA, contribute through panel discussions and expert-led, solution-focused sessions that support informed decision-making and real-world collaboration across Malaysia.

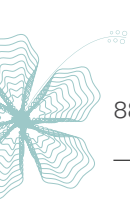
CTOS SME Biz Day	CTOS SME Biz Symposium
<ul style="list-style-type: none"> ○ 6 May: Kuala Lumpur ○ 12 June: Penang ○ 9 July: Johor Bahru ○ 19 August: Kuching 	<ul style="list-style-type: none"> ○ 9 September: Melaka ○ 23 September: Kuantan ○ 7 October: Kota Kinabalu ○ 4 November: Butterworth

Progress & Impacts:

Total SMEs engaged nationwide:
>7,500

Kuala Lumpur flagship event participants:
Approximately 1,000

Number of industry partners:
72



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

Credit Awareness for Inclusive Financial Access

Access to credit alone is not enough; individuals must also understand how credit works to make responsible financial choices. We strengthened credit awareness and confidence among underserved communities through targeted marketing initiatives, affordable credit health solutions, simplified product messaging, bilingual (Bahasa-English) educational content and webinars.

Working closely with government agencies and corporate partners, including AKPK, Bank Negara Malaysia, the Ministry of Finance and the Malaysia Department of Insolvency, we delivered community outreach programmes focused on responsible borrowing, spending and financial literacy.



Progress & Impacts:

Nationwide financial literacy engagements:
111

Individuals reached:
36,869

EMPOWERING PROGRESS & RESILIENCE

Financial Literacy for the Next Generation

Practical financial knowledge shapes lifelong habits, building judgement and confidence as young adults enter the formal financial education through on-site university engagements and webinars, deepening understanding of credit scoring and strengthening financial management skills.

In collaboration with MyCelik Network and Standard Chartered Bank, the CTOS GenCelik Financial Wizard Programme equips Malaysian university students aged 18 to 25 with personal finance knowledge and skills. Through interactive modules and mentorship, the programme addresses growing concerns over student debt and poor money management, helping students build a strong foundation for financial independence.



- 18th May 2025 - Universiti Putra Malaysia (UPM), Selangor
- 30th May 2025 - University College MAIWP International (UCMI), Kuala Lumpur
- 20th June 2025 - Universiti Malaya (UM), Kuala Lumpur
- 3rd July 2025 - Taylor's University, Selangor
- 27th October 2025 - Inti International College Subang

Progress & Impacts:

Total students who attended the programme:
459

Digital financial education sessions delivered:
25 webinars and TikTok Live events.

Increase in financial literacy retention:
94% according to post-event surveys.

Total individuals reached:
12,075 across the community.



SUSTAINABILITY STATEMENT

EMPOWERING PROGRESS & RESILIENCE

Outlook

CTOS believes that financial well-being should not be a privilege. Our goal is to give every Malaysian, from fresh graduates to gig workers, the tools and confidence to own their financial well-being. We know that financial education can feel overwhelming, which is why we are meeting people where they are. By integrating credit health tools directly into everyday touchpoints like e-wallets, pensions and education loans, we will be breaking down the barriers that keep the underserved away from formal banking.

We will partner with employers to treat financial literacy as a critical knowledge, recognising that a workforce free from debt-related stress is a more resilient one at workplaces. On the ground, we aim to explain credit scoring through face-to-face engagements at roadshows and programmes, helping more people enhance their “Credit IQ” for better financial practices.

Finally, we will leverage high-traffic social platforms to deliver bite-sized, relatable financial education to the youth and gig-economy workers. By leveraging high-engagement platforms, we are creating digitally savvy and credit-conscious consumers.



SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

DIVERSITY, EQUITY & INCLUSION (DEI)

At CTOS, we strive to build a culture rooted in fairness, integrity and respect – one that reflects the diversity of the communities we serve. We apply fair and inclusive people practices, ensuring employees are respected and have equitable opportunities to contribute and grow.

Our Approach

We integrate DEI principles across the employee lifecycle, from recruitment to development and recognition. Our Human Resources (HR) team actively reviews and strengthens policies to promote fair access to opportunities and to prevent discrimination. We also aim to foster a workplace where different perspectives are valued and respected through engagement events and communication channels.

DIVERSITY

EMBRACING DIVERSITY IN EVERY FORM

At CTOS, we are committed to building a workforce that reflects the diverse communities. We value different backgrounds and experiences, knowing they strengthen our ability to innovate and grow. By fostering an inclusive environment, we promote collaboration and mutual respect across the organisation.

EQUITY

EQUAL OPPORTUNITIES FOR ALL

At CTOS, our hiring, development and performance processes are guided by merit, not background. We proactively remove barriers to opportunity and accommodate individual needs, ensuring fairness in pay, performance evaluation and progression.

INCLUSION

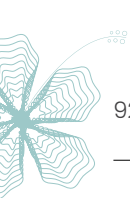
FOSTERING A SENSE OF BELONGING

At CTOS, we create a workplace where every employee feels respected, supported and valued. Through inclusive practices such as flexible work arrangements, equitable leave policies, opportunities for growth and open feedback, we ensure everyone has the opportunity to contribute fully and thrive.

Guided by Code of Business Conduct and Ethics (COBE) Policy

CTOS enforces a zero-tolerance approach to discrimination, harassment and inappropriate conduct. Our Code of Business Conduct and Ethics Policy sets clear expectations for behaviour and provides mechanisms to address misconduct. Thus, we actively reinforce a culture where individuals from underrepresented and diverse backgrounds feel safe, respected and valued.

To learn more about our COBE, read <https://ctosdigital.com/wp-content/uploads/2022/04/Code-of-Business-Conduct-and-Ethics.pdf>



SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

Whistleblowing Mechanisms

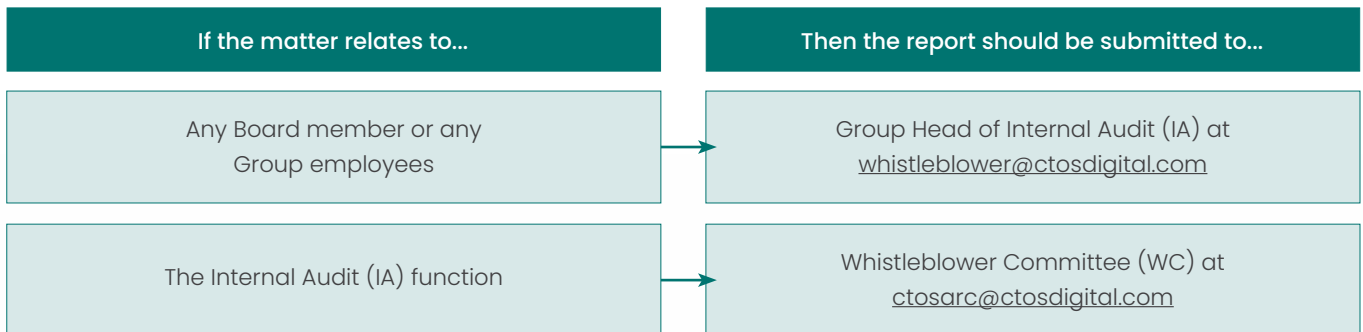
Employees must feel safe to speak up without fear of retaliation. Our Whistleblowing Policy safeguards this by enabling confidential reporting of any witnessed, discovered, or suspected improper conduct or wrongdoing related to CTOS, including but not limited to:

Fraud	Bribery and corruption	Abuse of power	Conflict of interest
Theft or embezzlement	Misuse of the Company's property	Non-compliance with the Company's policies or code of conduct	

We go beyond legal compliance by reinforcing employees' voice through various channels. Concerns can be raised confidentially through:

- **Whistleblowing Channel** (anonymous, monitored by Internal Audit)
- **"Tell HR" e-mail channel** (for individual concerns or workplace issues)
- **CEO Dialogue Sessions** (regular open forums for employee feedback)

In cases involving harassment, misconduct or hostility, a dedicated whistleblowing contact ensures discreet handling. All reports are reviewed independently by our Internal Audit team to ensure objectivity and follow-through.



NURTURING EMPLOYEE GROWTH

2025 Programmes & Initiatives

Inclusive Recruitment Practices

Fair hiring practices build trust and ensure CTOS attracts the best talent based on capability rather than background. We designed recruitment processes to minimise gender and racial bias. Hiring managers assess candidates based on role requirements and actively build diverse teams aligned with business needs.

Progress & Impacts:

Incidents of discrimination:

Zero

Diversity of 189 New Hires in 2025:

By Gender		By Ethnicity		By Age		By Nationality
Male: 99	Female: 90	Chinese: 103	Malay: 72	Indian: 10	Others: 4	Malaysian: 188
				<30: 87	>50: 9	Non-Malaysian: 1
				30-50: 93		

Diversity in Leadership

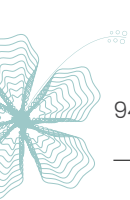
Balanced leadership teams improve the quality of group-wide decision-making. Every year, we ensure racial, gender and age diversity is reflected in managerial and senior leadership roles through fair and merit-based hiring. Additionally, we increased Malaysian representation in the leadership team.

CV Screening	Initial Phone Screening	Background & Referral Checks
Structured Interviews	Reference Checks	Evaluation & Decision-Making

Progress & Impacts:

Female representation in senior leadership:

41%



SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

Cultural Diversity Awareness

Cultural understanding enables diverse teams to collaborate effectively, exercise sound judgement and deliver trusted services to customers. We foster understanding and respect across our workforce by recognising and celebrating cultural diversity through employee engagement initiatives and festive celebrations.



Outlook

At CTOS, we believe that sustainable growth and innovation are strengthened by a workforce that reflects diverse perspectives, experiences and ideas. As we continue to evolve as a leading data and fintech organisation, our commitment to Diversity, Equity and Inclusion (DEI) remains central to how we build talent, design products and serve our customers. Our focus is on moving beyond representation towards impact-driven inclusion, where every employee is empowered to contribute meaningfully, and where equitable practices are embedded across the employee lifecycle. This includes strengthening fair hiring practices, enhancing transparency in performance and reward outcomes as well as ensuring equal access to development and leadership opportunities.

Leadership accountability for DEI outcomes, with measurable targets integrated into performance scorecards.

Inclusive talent pipelines, ensuring we attract and develop diverse talent across all levels, particularly in critical and leadership roles.

Pay equity within teams are considered when making offers to external candidates and for consideration for internal promotions.

Culture and belonging, fostering an environment where diverse voices are heard, respected, and acted upon.

SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

TALENT DEVELOPMENT & GROWTH

A future-ready workforce supports CTOS' growth strategy and manages talent-related risks, employee turnover and leadership continuity. We invest in our people through structured learning, leadership pipelines and meaningful career mobility. As our people grow, so does our ability to innovate and deliver value to the communities we serve.

Our Approach

We place strong emphasis on leadership readiness to ensure managers at all levels can lead diverse teams effectively. In line with learning and development policy, opportunities are accessible to all eligible employees, reinforcing talent sustainability and organisational resilience.

Learning & Development Policy

Career growth at CTOS is guided by our Learning & Development Policy, which sets a structured framework for continuous capability building. Our approach centres on four key training pillars:

<p>REGULATORY</p> <p>A mandatory programme designed to ensure individuals meet regulatory requirements and uphold corporate governance.</p>	<p>LEADERSHIP</p> <p>A targeted initiative to equip managers with the competencies required to align teams, inspire engagement and enhance the capabilities of others, enabling the effective execution of CTOS strategy objectives.</p>	<p>FUNCTIONAL</p> <p>A technical and/or practical-based programme aimed at improving technical skills and practical skills. This includes accredited programmes that lead to certifications or professional qualifications tailored to the requirements of the specific job roles.</p>	<p>PERSONAL EFFECTIVENESS</p> <p>A programme centred on providing individuals with tools for self-improvement, enabling them to strengthen personal competencies and make good use of their resources.</p>
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Employee Training Evaluation

Development priorities are shaped through ongoing conversations with employees and managers, insights from performance reviews, and structured Training Needs Analysis (TNA), while also considering regulatory and operational responsibilities. This helps ensure that learning supports both individual growth and the organisation's objectives.

Focus Areas for Employee Skills Development		
<p>People & Leadership</p> <ul style="list-style-type: none"> • Performance management & coaching • Fair & compliant misconduct handling 	<p>Governance & Integrity</p> <ul style="list-style-type: none"> • Employment law & industrial relations • Ethical conduct & integrity 	<p>Business & Digital Capability</p> <ul style="list-style-type: none"> • Sales effectiveness & customer management • Digital productivity, automation & data



SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

2025 Programmes & Initiatives

Total Employee Training Hours:
11,482 hours

Average Training Hours per Employee:
22 hours

Leadership Coaching for Growth

To strengthen leadership capability, we conducted coaching programmes that build manager skills in providing structured performance and development feedback.

Key Programme:

People Empowered Through Applied Coaching (PEAC)

This is a leadership development programme designed for people managers to strengthen their ability to empower employees and improve day-to-day operational productivity and performance through practical coaching skills.

We equipped managers with a clear understanding of coaching and how it differs from mentoring, consulting, teaching, counselling and supervising. Participants learnt how to apply coaching techniques in everyday workplace situations, including running more effective meetings, facilitating solution-focused discussions and coaching conversations that are concise and outcome-driven. PEAC also introduced practical tools and models such as the SERVE coaching model, laser coaching, corridor coaching techniques and structured coaching solution methodologies.

2025 Participation:

Number of Participants:
22

Average Training Hours:
16 hours per participant

SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

Managing Performance with Integrity

We equipped managers and leaders to address underperformance and disciplinary matters constructively, in line with employment law and internal policies. This ensures clear expectations for employees and reinforces fair, consistent decision-making. All managers attended Optimising Performance & Managing Misconduct training, which provided awareness on industrial and employee relations. This provided managers with greater confidence in handling performance and misconduct matters fairly and compliantly as well as conducting difficult conversations.

2025 Participation:

Number of Participants:
107

Average Training Hours:
14.7 hours per participant

Building Digital Skills

Digital capability enables employees to work confidently, make data-driven decisions and adapt to a rapidly evolving business environment. We delivered role-specific digital and technical training programmes covering productivity tools, AI, Data Analytics and Agentic Automation. These programmes enhanced employees' ability to apply AI, automation, cloud technologies and data analytics in their work to improve productivity, streamline processes and drive informed decision-making. Professional certifications in Agentic Automation, Cloud and DevSecOps strengthen technical credibility and reinforce secure technology practices, while specialised programmes such as Python for Data Science foster innovation and problem-solving capabilities. Participation in industry conferences broadens strategic perspectives on emerging technologies.

2025 Participation:

Number of Participants:
20

Average Training Hours:
16 hours per participant

Outlook

As we look ahead, our growth ambition is inseparable from the knowledge strength and innovation of our people. In an increasingly data-driven and digitally accelerated environment, we are committed to building a workforce that is future defining. We will continue to invest in capabilities through targeted upskilling, certifications and leadership development. We will strengthen our employee value proposition to ensure that CTOS remains a place where employees can contribute meaningfully and grow.



SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

EMPLOYEE WELFARE & WELL-BEING

At CTOS, we view employee well-being as a critical enabler of performance and sustainability. By fostering a supportive environment that prioritises physical and mental health, we empower our people to manage work demands effectively, build resilience and thrive both professionally and personally.

Workload & Efficiency Management

**Streamline Processes**

Manage workloads and improves efficiency by automating selected processes and streamlining routine tasks through digital tools and workflow automation.

**Operational Enablement**

Improve efficiency through initiatives, such as Lean Six Sigma, to improve employee well-being and organisational efficiency. Our technology team supported this initiative with the rollout of an enhanced ERP system in Finance.

Occupational Safety and Health Coordinators, Floor Marshals & Fire Wardens

**Workplace Safety Systems**

Dedicated Occupational Safety and Health Coordinator, Floor Marshals, Fire Wardens that comprising representatives from all departments support the implementation and monitoring of workplace safety and security. The team identifies and escalates potential risks, promotes compliance with safety guidelines, and coordinates emergency preparedness initiatives, including evacuation drills. Selected members are trained in first aid and CPR for emergency response capabilities and workplace readiness.

**Occupational Safety and Health Training Workplace**

Incidents can disrupt operations and put employees at risk. By training Occupational Safety and Health Coordinators, Floor Marshals and Fire Wardens, we ensure that safety practices are actively monitored and embedded, giving employees confidence that their work environment is secure and compliant. Five employees completed a three-day Occupational Safety and Health Coordinator (OSH-C) programme.

Employee Welfare & Engagement

**Digital Well-being Support**

Provide employees with access to a third party medical administrator platform, which offers health risk assessments, wellness tracking, and mental health questionnaires, supported by health-focused e-newsletters and webinars.

NURTURING EMPLOYEE GROWTH

2025 Programmes & Initiatives

CTOS Wellness Fair 2025

Employees thrive when they feel physically healthy and mentally supported. The Wellness Fair, held in November 2025, provided employees with knowledge, tools and early interventions to prevent health risks, manage stress and build sustainable habits that benefit both personal and professional life.

This initiative helped increase awareness of physical health risks and preventive care, improved access to mental health support while reducing stigma and encouraged healthier lifestyle choices through participation in the company-wide fitness challenge.

Key Components of the Wellness Fair:

- Basic health assessments, including blood pressure, glucose and general health indicators.
- Mental health screening using the DASS-21 assessment, with on-site consultation by a qualified mental health practitioner.
- Influenza vaccinations, fully or partially subsidised.
- Occupational AI-based health risk screening.
- Optical and physiotherapy assessments, including quick treatment sessions.
- Company-wide fitness challenge to encourage physical activity and healthy habits

2025 Participation:

Number of Participants:
Over 145

Basic Health Assessments
Completed:
80 employees

Influenza Vaccinations
Provided:
60 employees

Feedback from Employees:

"The Company Wellness Day was both fun and fruitful. The activities were engaging, well-organised and created a positive atmosphere for everyone to relax, interact and learn more about wellness."

– **Manager, Finance Projects**

"The Wellness Day 2025 was a meaningful and well-organised event that promoted healthy lifestyle awareness and strengthened teamwork among staff."

– **Section Head, Sales Support**



SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

Occupational Safety Training

Workplace incidents can disrupt operations and put employees at risk. By training designated safety coordinators, we ensure that safety practices are actively monitored and embedded, giving employees confidence that their work environment is secure and compliant.

In 2025, we adopted a role-based approach to occupational safety and health (OSH) training. Formal OSH training was provided to designated personnel appointed as Persons-in-Charge (PICs) for workplace safety. Selected employees completed a three-day Occupational Safety and Health Coordinator (OSH-C) programme. These trained PICs coordinate safety practices, monitor health and safety risks and support compliance with relevant OSH requirements.

Progress & Impacts:

Increased employee awareness and confidence in workplace safety and emergency preparedness.




SUSTAINABILITY STATEMENT

NURTURING EMPLOYEE GROWTH

At CTOS, we uphold fair, transparent and responsible employment practices through clear policies and safeguards that protect employee rights and cultivate a respectful workplace.


CTOS fosters a culture where people can work efficiently, stay healthy and focus on meaningful contributions. We provide consistent benefits to support employee well-being across its workforce. We maintain a non-interference approach, allowing employees to express views and raise concerns collectively without fear of retaliation.

Employee Benefits




We provide consistent benefits to support employee well-being across its workforce. In 2025, contract employees engaged for six months or more received the same benefits as permanent employees, apart from medical coverage, which applied to the employee only and did not extend to immediate family members.

Freedom of Association




We maintain a non-interference approach, allowing employees to express views and raise concerns collectively without fear of retaliation. This commitment is embedded in the Company's Code of Business Conduct & Ethics (COBE) Policy and reinforced through the Whistleblowing Policy, promoting a respectful and transparent workplace.

Fair Wages and Living Wage Commitments



We ensure fair and competitive pay through market-aligned remuneration practices. Salaries are benchmarked against industry data and reviewed regularly to reflect role responsibilities, performance, and market movements. Compliance with the Employment Act 1955, minimum wage regulations, and internal equity principles ensures employees receive sustainable earnings.

Handling Labour Standards Non-Compliance



We have clear procedures to address and disclose any labour standards non-compliance. This includes formal investigations, corrective actions, and internal reporting. All incidents are managed under the Company's employee relations, ethics, and grievance policies. No cases of non-compliance have been reported to date.

Outlook

At CTOS, we recognise that employee well-being is fundamental to sustained performance, resilience and long-term value creation. As the nature of work continues to evolve, we remain committed to fostering a workplace that enables our people to stay healthy, engaged and equipped to perform at their best. Looking ahead, we will continue to strengthen our approach to well-being by embedding it more deeply into how work is designed and experienced across the organisation. This includes automating work processes, leveraging technology to improve efficiencies and reinforcing a culture where well-being is actively supported by managers and leaders with open conversations around mental health and work-life balance.



SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

GOVERNANCE, INTEGRITY & ACCOUNTABILITY

Trust sits at the heart of the credit reporting ecosystem. Every day, individuals, businesses and institutions rely on CTOS to handle sensitive information with care and integrity. This responsibility shapes how we govern our business, protect data and engage with stakeholders.

Our Approach

Strong governance ensures that integrity and accountability guide decisions at every level of CTOS. The Board of Directors, as CTOS' highest governing body, is responsible for overseeing the Group's long-term sustainability, financial integrity and risk management. Management and dedicated committees support the Board by embedding governance and sustainability considerations into strategy, operations and performance management across the Group. This structure reinforces accountability and ensures that integrity is a core part of how CTOS operates.

Roles	Responsibilities
<p>Board of Directors</p>	<ul style="list-style-type: none"> • Provides oversight of ESG considerations into strategy and decision-making. • Approves the group-wide sustainability blueprint and roadmap. • Oversees and approves group-wide policies and frameworks implemented.
<p>Audit Committee (AC)</p>	<ul style="list-style-type: none"> • Provides independent oversight of the organisation's financial reporting and governance processes. • Evaluates the effectiveness of internal controls and oversees both internal and external audit functions. • Reviews and manages matters involving related party transactions, potential conflicts of interest and whistleblowing reports to ensure transparency across the organisation.
<p>Risk & Compliance Committee (RCC)</p>	<ul style="list-style-type: none"> • Provides oversight on the implementation of the risk management framework. • Monitors compliance, governance and sustainability matters. • Reviews overall governance improvements and responsible business practices across the organisation. • Reviews and recommends sustainability action plans for Board approval. • Oversees execution of the sustainability framework to ensure alignment with strategic goals. • Facilitates discussions on sustainability progress and key developments, supported by quarterly updates from the Group to track and refine initiatives.
<p>Group Chief Executive Officer (GCEO)</p>	<ul style="list-style-type: none"> • Approves key sustainability decisions and initiatives. • Leads execution of sustainability strategies endorsed by the Board. • Engages with stakeholders to understand expectations, concerns and opportunities. • Conducts monthly reviews with the Group Head of Corporate Strategy and Planning to track progress.

SUSTAINABILITY STATEMENT
ACTING WITH INTEGRITY

Roles	Responsibilities
<p>General Manager, Corporate Strategy and Sustainability</p>	<ul style="list-style-type: none"> • Develops and proposes CTOS’ sustainability strategy to the Group CEO and Board. • Implements and integrates sustainability plans across business and operational departments, focusing on key ESG priorities. • Quarterly reporting to RCC
<p>Senior Management and Head of Departments</p>	<ul style="list-style-type: none"> • Implements sustainability initiatives and report progress to the General Manager, Corporate Strategy and Sustainability.

For more information on the risk governance roles and responsibilities, see page 109 of Sustainability Risk Management.

Key Governance Actions

The Board reviews sustainability priorities annually and receives regular updates through the Risk and Compliance Committee (RCC). Management provides quarterly updates on key risks, regulatory developments and implementation progress. These discussions guide management actions, resource allocation and the continuous strengthening of governance practices. Where issues require urgent attention, clear escalation mechanisms enable timely management action, with matters elevated to the RCC where appropriate.

Frequency	Key Actions
<p>Quarterly</p>	<ul style="list-style-type: none"> (i) To oversee the internal control framework and policies of the Company and its subsidiaries (“Group”), and assessing the processes related to the Group’s risks and control environment; and (ii) To ensure the sustainability and Environmental, Social and Governance (“ESG”) factors are considered into the Company’s financial reporting and audit process











SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

Fair Leadership Remuneration

CTOS reinforces accountability through transparent and structured remuneration frameworks. The Directors' Remuneration Policy and the Senior Management Remuneration and Assessment Framework align leadership incentives with long-term value creation and sustainable performance outcomes.

BOARD OF DIRECTORS REMUNERATION POLICY	SENIOR MANAGEMENT REMUNERATION & ASSESSMENT FRAMEWORK
 Ensures fair and transparent compensation for Board members.	 Aligns remuneration for GCEO and Senior Management
 Reflects the distinct roles, responsibilities and contributions.	 Management with shareholder interests.
 Covers considerations for salary, benefits-in-kind and other emoluments.	 Drives financial, operational and sustainability outcomes.
 Undergoes periodic reviews by the NRC to ensure relevance and competitiveness.	 Rewards contributions made by high-performing individuals.

To supplement this, material sustainability risks and opportunities form part of Senior Management performance assessments. These assessments focus on strategy execution, operational delivery and the achievement of defined qualitative and quantitative targets, reinforcing accountability at leadership level.

SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

Group-Wide Policies & Frameworks

CTOS maintains a comprehensive integrity framework supported by clear codes and policies. These policies apply to employees, directors, subsidiaries, related companies and business associates. All policy updates recommended by the Nomination and Remuneration Committee (NRC) are subject to Board review and approval, ensuring consistency and accountability across the Group.

For more information on our policies and frameworks, visit our website.

OUR GOVERNANCE CODE AND POLICIES

Code of Conduct and Business Ethics COBE

Sets the standard for integrity across the CTOS Group, guiding every employee, from our leadership to our newest joiners to act with professionalism and sound judgement.

Directors' Qualification Fit and Proper Policy

Ensures our leadership maintains the highest standards of character and integrity. It provides a transparent framework for selecting Directors with the right mix of skills and experience to lead CTOS effectively and foster a culture of transparency.

Board Remuneration Policy

Covers salary, benefits-in-kind, and other emoluments, aligned with the distinct roles, responsibilities, and contributions of each Board member.

Board Charter

The Board is guided by the Board Charter in carrying out its duties and responsibilities. The Board Charter provides structured guidance on the operation of the Board and the delegation of its responsibilities to the Board Committees, namely Audit Committee, the Risk and Compliance Committee ("RCC"), the Nomination and Remuneration Committee, the Board Investment Committee and the Employees' Share Option Scheme Committee.

Anti-Bribery and Anti-Corruption (ABAC) Policy

Addresses a broad range of corruption risks, including bribery, facilitation payments, improper gifts or hospitality, conflicts of interest, fraud and improper political contributions. It also covers third-party risks involving agents, consultants and suppliers, reinforcing integrity across CTOS' operations and business relationships.

Whistleblowing Policy

Speaking up safely is essential to a strong governance culture. CTOS provides secure and confidential whistleblowing channels, including a dedicated email and direct access to the Whistleblower Committee. The policy protects individuals who raise concerns in good faith, allows anonymous reporting, and ensures independent investigations to uphold fairness and trust.



SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

2025 Programmes and Initiatives

National Corporate Governance & Sustainability Awards (NACGSA): Top 50

Achieved over 75% on the ASEAN Corporate Governance Scorecard

Leadership Capacity Building

Effective governance depends on leaders who understand their responsibilities and exercise sound judgement. We invest in leadership capacity building to ensure the Board and senior management remain informed, confident and equipped to oversee ethical conduct, regulatory expectations and emerging risks. These programmes support meaningful discussion and informed decision-making at the highest levels of governance.

Progress & Impacts:

Training	Description	Attendance
Board Awareness Training: IFRS S1 and S2 (Climate-related Disclosures)	Equipped the Board of Directors with a clear understanding of IFRS S1 and S2 requirements and their implications for CTOS during the National Sustainability Reporting Framework (NSRF) transition period. The training covered the principles of governance, strategy, risk management, and reporting on metrics and targets.	Board: 7 SLT/CLT: 7
Driving Sustainable Leadership: Empowering Boards for Lasting Impact	Helped board members to transition from traditional governance to Steward Leadership. They learnt to position sustainability as a core strategic driver, gaining practical tools to balance long-term profitability with meaningful societal impact.	Board: 1
MAP Part II Leading with Impact (LIP)	Introduced under the Securities Commission Malaysia's Corporate Governance Strategic Priorities, directors are equipped with the knowledge to effectively oversee sustainability risks, opportunities, and material ESG matters.	Board: 1
Optimising Performance and Managing Misconduct	Provided comprehensive training on Malaysian labour laws, employee misconduct management, and performance improvement processes. The sessions offered practical guidance on disciplinary procedures, conducting domestic inquiries, managing poor performance, and handling workplace issues in compliance with employment legislation.	SLT/CLT: 11

SUSTAINABILITY STATEMENT
ACTING WITH INTEGRITY

ABAC Training and Effectiveness

A strong culture of integrity starts with clear expectations and consistent reinforcement. CTOS adopts a zero-tolerance approach to bribery and corruption, supported by regular training and practical guidance for employees, leadership and key vendors. These initiatives strengthen awareness, prevent misconduct and reinforce ethical behaviour across our value chain.



Employee and Vendor Training:

ABAC training was provided to all new employees as part of mandatory onboarding, and key vendors also received training, with a phased rollout planned for all remaining vendors.



Leadership Training:

Annual ABAC training for the Board of Directors was successfully completed on 25 November 2025.



Ongoing Awareness:

Quarterly electronic direct mails (EDMs) were issued to staff to reinforce understanding and adherence to ABAC policies.



Gift Declarations:

In line with the festive season, we are developing a Gift, Entertainment and Hospitality (GEH) Policy to share the gift declaration form with employees to ensure compliance.

Progress & Impacts:

Board Members Trained on ABAC:
100%

Employees Trained on ABAC:
100%

High-Risk Departments Trained:
100%

Allegations of Corruption:
Zero

Employees Disciplined or Dismissed due to Breaches of Anti-Corruption Policies:
Zero

Corruption-Related Fines:
Zero



SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

Building Trust Through Compliance

Compliance is fundamental to maintaining trust in the credit reporting ecosystem. CTOS prioritises adherence to applicable laws and regulations, while continuously strengthening internal controls to identify and address potential gaps early.

As of 31 December 2025, we remain compliant with laws and regulations, which are applicable to our core businesses and activities.

Progress & Impacts:

Non-compliance as of 31 December 2025:

Zero

Outlook

A strong governance culture depends on trust, accountability and the confidence to speak up. CTOS will continue to strengthen these foundations by promoting open dialogue, protecting those who raise concerns in good faith and reinforcing ethical leadership at every level.

Building on our established ABAC programme and the recent policy review, our focus in 2026 will shift toward continuous improvement, including deeper data-driven monitoring, targeted refresher training for high-risk segments and enhanced third-party due diligence processes. To strengthen regulatory readiness, we will tighten internal controls, sharpen Group-wide risk visibility, enhance whistleblowing channels and stay ahead of evolving regulatory and industry expectations. These measures will reinforce proactive governance while keeping integrity central to how we operate.

SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

SUSTAINABILITY RISK MANAGEMENT

The long-term resilience of CTOS depends on how well we anticipate, manage and respond to sustainability-related risks across our operations and value chain. These risks do not affect the business in isolation—they influence the reliability of our services for customers, the safety and integrity of our workplace for employees and the confidence placed in us by regulators, partners and the wider financial ecosystem.

Our Approach

CTOS manages sustainability-related risks through its risk management framework, which provides a structured and consistent approach to identifying, assessing and managing risks across the Group. Sustainability considerations are embedded within the core risk framework, reflecting our view that ESG-related risks are business risks rather than standalone issues. This integration ensures sustainability-related risks receive the same level of oversight and attention as other principal risks, guided by the ISO 31000 Risk Management Guidelines.

01

Risk Oversight

The Board provides overall oversight of sustainability risk management and regularly reviews material sustainability risks and opportunities. In 2025, Board was informed and agreeable to perform the Group's double materiality assessment, which examined both CTOS' impacts on the environment and society and the sustainability-related risks that could affect the business. These insights inform the prioritisation of mitigation actions, which Management implements within defined timeframes and monitors for effectiveness.

The Risk and Compliance Committee (RCC), mandated by the Board, supports this oversight by strengthening risk governance processes, internal controls and escalation mechanisms. Together, these structures enable timely identification and management of sustainability-related risks across the organisation.

02

Risk Identification & Assessment

CTOS identifies sustainability-related risks through ongoing monitoring of environmental, social, governance and regulatory developments that may affect our operations and stakeholder expectations. Management assesses identified risks using the Group's established methodology, considering potential impact, likelihood and the effectiveness of existing controls.

These risks are reviewed through management forums and escalated through formal governance channels to the RCC and the Board, ensuring consistency with how other principal risks are managed.

03

Risk Integration into Decision-Making

We integrate sustainability-related risks and opportunities into decision-making by assessing how ESG factors may influence strategy, operations and long-term performance. Thus, this enables the Group to manage downside risks proactively while identifying opportunities that support resilience and sustainable value creation.

04

Risk Monitoring & Continuous Improvement

We actively monitor sustainability-related risks. Management tracks mitigation actions and control effectiveness and regularly reports progress to senior leadership and the Board. This supports informed oversight and continuous improvement as risks evolve.



SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

2025 Programmes and Initiatives

We recorded ZERO major sustainability-related incidents that materially affected our business continuity.

Risk Management Enhancements

CTOS drives sustainability through measures that proactively manage risks. In 2025, we strengthened our risk management framework through the enhanced utilisation of a centralised risk management system to support risk identification, assessment, monitoring and reporting across the organisation. The system provides a structured platform for maintaining risk registers, tracking mitigation actions and key risk indicators and improving the consistency and timeliness of risk reporting to Management and the Board.

The enhanced system has also facilitated the integration of sustainability-related risks into the Group's overall risk management processes, supporting more informed decision-making and long-term value creation. These improvements reinforce the Group's commitment to maintaining a transparent and forward-looking risk management framework.

Corruption Risk Management (CRM)

Integrity is fundamental to how we operate. At CTOS, managing corruption risks is not just a compliance exercise – it is essential to maintaining trust with our stakeholders. Our Corruption Risk Management (CRM) is a key pillar of CTOS' broader commitment to integrity and sustainability. Guided by ISO 31000:2018 Risk Management principles, we actively identify and prioritise corruption-related risks across our operations. We recognise that risks such as bribery, fraud and undue influence can damage trust, weaken governance and affect our long-term sustainability if left unaddressed.

To mitigate these risks, the Group has implemented a structured CRM programme to systematically identify, monitor and address potential exposures in line with the Guidelines on Adequate Procedures issued by the Prime Minister's Department of Malaysia. The assessment considered emerging risk trends and newly identified vulnerabilities. Its findings will enable us to strengthen controls, close identified gaps and implement targeted mitigation measures in higher-risk areas.

SUSTAINABILITY STATEMENT
ACTING WITH INTEGRITY

Corruption Risk Management (CRM) *continued*

Step **01**

Set the Scope

- Define the business areas covered, relevant regulatory requirements and key risk considerations.
- Establish clear parameters to ensure the assessment is structured and focused.

Step **02**

Identify & Understand Corruption Risks

- Identify potential corruption risks across business units, including both internal and external exposures.
- Analyse each risk to understand its causes, likelihood and potential impact if it occurs.

Step **03**

Review Existing Controls & Assess Gaps

- Evaluate current controls to determine how effectively they prevent and detect corruption.
- Assess overall risk exposure after considering existing safeguards to identify areas for improvement.

Step **04**

Strengthen Mitigation Measures

- Determine appropriate measures to address identified risks, which may include enhancing controls or introducing additional preventive steps.
- Develop and implement targeted action plans to reinforce the Group's anti-corruption framework.

Step **05**

Monitor, Report and Improve

- Conduct ongoing reporting, monitoring and periodic reviews to ensure controls remain effective over time.
- Maintain communication with relevant stakeholders to support transparency and continuous improvement.

Progress & Impacts:

Corruption Risks Areas Identified:

3 (government interactions, vendor management and client relations)

Outlook

Looking ahead, we will continue to strengthen sustainability risk management by integrating ESG considerations more deeply into risk management, strategic planning and operational risk assessments. The Group will enhance oversight, clarify accountability, as well as use data and technology to identify emerging risks earlier. In parallel, we will continue to enhance Board and management oversight by strengthening risk governance structures and clarifying accountability for sustainability-related objectives.



SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

RESPONSIBLE SUPPLY CHAIN

The way our suppliers operate directly affects CTOS' ability to deliver reliable services, protect customer trust and maintain the integrity of our credit ecosystem. Our vendors and technology partners are critical to the functioning of CTOS' platforms and operations, and collaborating closely with them ensures secure, responsible and sustainable growth across the Group.

Our Approach

At CTOS, we are committed to progressively integrating ESG principles into all supplier engagements to strengthen the integrity and resilience of our supply chain. Although a formal ESG self-declaration is not currently implemented, we intend to incorporate this requirement into our Vendor Code of Conduct (VCOC), encompassing key areas such as fair labour practices, environmental compliance, and responsible data management. At CTOS, we integrate ESG principles into all supplier engagements to safeguard the integrity and resilience of our supply chain. Every supplier and technology partner is required to complete a self-declaration confirming compliance with ESG standards, including fair labour practices, environmental compliance and responsible data management as outlined in CTOS' Vendor Code of Conduct (VCOC).

We proactively ensure suppliers meet CTOS' operational and ethical standards through financial stability checks, due diligence and background verification. From the start, sustainability considerations are integrated via the ABAC questionnaire, VCOC and Vendor Registration Form, while comprehensive ESG assessments are still being developed.

2025 Programmes and Initiatives

Supplier Complaints: Zero

Third-Party Security Management

All procurement involving IT systems, services, or data is conducted in accordance with the Company's Third-Party Security Management requirements. The IT Department is responsible for assessing IT-related risks associated with third-party vendors, including cybersecurity, data protection, and system compatibility.

All IT-related procurement requests are subject to review by the IT Department, which evaluates and benchmarks vendors against established criteria and approved service providers. Based on these assessments, the IT Department maintains a list of approved vendors, which Procurement prioritises for all IT-related engagements.

Progress & Impacts:

**Partner Cyber Risk Compliance:
100%**

SUSTAINABILITY STATEMENT

ACTING WITH INTEGRITY

Onboarding Responsible Suppliers

Prioritising suppliers with strong ethical compliance ensures CTOS maintains operational integrity and business continuity. We are progressively integrating high-performing suppliers into our procurement ecosystem, with all new vendors adhering to our Anti-bribery and Anti-Corruption Policy and Vendor Code of Conduct. These measures enhance supplier capability and contribute to a more secure, responsible supply base.

Progress & Impacts:

Local Suppliers Engaged:

532

Suppliers Training & Capacity Building

Providing targeted training builds suppliers' knowledge and judgement, enabling them to act responsibly and consistently in line with CTOS expectations. In 2025, we delivered virtual ABAC and sustainability best-practice training to 30 key vendors, selected for their risk profile and strategic importance to our supply chain. Participating vendors reported improved understanding of ABAC obligations and strengthened internal processes to meet CTOS' standards.

Outlook

Our next steps will focus on building a resilient supply ecosystem to proactively manage supply chain risks. We recognise that our responsibility extends beyond our own operations to the partners we choose and the standards they uphold. To achieve this, we have identified five strategic focus areas that will drive our sustainability journey forward.

We are integrating ESG criteria directly into our supplier selection and onboarding processes to ensure our partners align with our values from the very beginning. This will be supported by enhanced supplier monitoring, allowing us to better manage sustainability risks through continuous evaluation. We also aim to deepen our stakeholder engagement by collaborating closely with key suppliers, encouraging responsible practices and supporting their continuous improvement.

A significant part of our strategy involves responsible and local sourcing, where we prioritise procuring from local suppliers to reduce our environmental impact and support our community's economic development. To ensure accountability, we will establish clear KPI measurement and reporting frameworks. These metrics will allow us to track supplier ESG compliance and measure our procurement-related sustainability performance with precision, ensuring that our supply chain remains both resilient and transparent.



SUSTAINABILITY STATEMENT

DRIVING ENVIRONMENTAL RESPONSIBILITY

CLIMATE ACTION & ENVIRONMENTAL FOOTPRINT

Malaysia and the wider ASEAN region are increasingly exposed to climate-related risks that affect communities, businesses and financial stability. As a credit reporting company, CTOS' most material environmental footprint comes from the carbon footprint of our operations and value chain. Our commitment to achieve net zero by 2050 reflects our responsibility to support a reliable financial ecosystem and deliver information services that matter to our customers and society.

Governance

Climate governance defines how CTOS oversees climate-related risks and opportunities and integrates these considerations into decision-making at every level of the organisation. Clear oversight ensures that we address climate considerations consistently, responsibly and in line with our long-term objectives as climate risks continue to evolve.

Roles & Responsibilities

CTOS governs climate-related matters through its existing corporate governance structures rather than a standalone framework. The Board, as the Group's highest governing body, oversees how we integrate climate considerations into strategy, risk management and day-to-day operations. This approach reflects the Board's view that climate change represents both a business and societal issue and establishes clear accountability across the Group.

Roles	Responsibilities
Board of Directors	<ul style="list-style-type: none"> Provides oversight of climate and environmental-related risks and opportunities. Ensures alignment with long-term business objectives and monitors progress toward climate targets.
Senior Leadership Team (SLT)	<ul style="list-style-type: none"> Integrates climate considerations into strategic planning and operational decision-making, supported by formal policies that align with global climate standards.
General Manager, Corporate Strategy and Sustainability	<ul style="list-style-type: none"> Develops and proposes CTOS' climate decarbonisation strategy to the Group CEO and Board. Implements and integrates climate and environmental programmes across business and operational departments.
Working Levels	<ul style="list-style-type: none"> Track all business-related travel and staff commuting, including vehicle types and total mileage for claims. Record monthly water usage from utility invoices and track waste produced. Monitor and report energy consumption data via the TNB app

SUSTAINABILITY STATEMENT

DRIVING ENVIRONMENTAL RESPONSIBILITY

Key Governance Actions

Effective climate governance begins with an informed and engaged Board. We strengthen oversight and accountability through regular discussions, reviews and updates on climate-related matters at both Board and senior leadership levels.

Governance Body	Frequency	Key Actions
Board	Annually	<ul style="list-style-type: none"> To review and approve annual sustainability roadmap.
Risk and Compliance Committee (RCC)	Quarterly	<ul style="list-style-type: none"> To review and monitor sustainability progress, risk, and opportunity.
Corporate Leadership Team (CLT)	Quarterly	<ul style="list-style-type: none"> To review and update sustainability progress, risk, and opportunity.

Leadership Training & Capacity Building

CTOS continues to build climate awareness and capability across the Board and senior leadership to support informed decision-making. In 2025, we equipped leaders with deeper climate knowledge, enabling them to respond proactively to emerging risks, regulatory shifts and stakeholder expectations.

Training	Description	Attendance
Board Awareness Training: IFRS S2 (Climate-related Disclosures)	Equipped the Board of Directors with a clear understanding of IFRS S2 requirements and their implications for CTOS during the National Sustainability Reporting Framework (NSRF) transition period. The training covered the principles of climate-related governance, strategy, risk management and reporting on metrics and targets.	Board: 7 CLT: 7 (100% attendance)

Strategy

We shape our climate-related strategy around our long-term ambition to achieve net zero emissions by 2050 and the need to remain resilient in a changing climate. Recognising this responsibility, we assess how climate-related developments and the transition to a low-carbon economy may influence our business, including impacts across our value chain, resource allocation and operations. Through this approach, we manage climate-related risks responsibly while continuing to deliver trusted information services that support customers, financial stability and society.



SUSTAINABILITY STATEMENT

DRIVING ENVIRONMENTAL RESPONSIBILITY

How Climate Considerations Shape CTOS' Strategy



Impacts on Business Model and Value Chain

CTOS' business model is primarily digital and data-driven, with key dependencies on technology infrastructure, energy availability, data security and service reliability. Climate-related risks and opportunities may affect the Group across its value chain, including:

- **Own operations:** Energy consumption, data centre resilience, business continuity and workforce safety.
- **Upstream dependencies:** Technology vendors, cloud service providers and energy sources.
- **Downstream activities:** Client demand for climate-related data, risk analytics and regulatory compliance solutions.



Impacts on Strategy and Decision-making

Climate-related risks and opportunities are increasingly considered in CTOS' strategic planning, capital allocation and risk management processes. These considerations inform decisions related to:

- Technology investments and infrastructure resilience.
- Product development and enhancement of data and analytics offerings.
- Operational efficiency and energy management initiatives.

CTOS is at an early stage of formalising a climate-related transition approach.



Financial Impacts and Financial Planning

- CTOS is actively exploring climate-related considerations to inform future financial planning and budgeting across short-, medium- and long-term horizons. While the financial impacts of climate-related risks and opportunities have not yet been quantified, the Group is developing plans to incorporate both qualitative and quantitative insights into future decision-making.



Climate Resilience of Strategy and Business Model

CTOS' digital business model provides a degree of inherent resilience to certain physical climate risks; however, the Group remains exposed through infrastructure dependencies, energy usage and third-party service providers.

The Group assesses climate resilience by:

- Incorporating climate-related risks into business continuity and disaster recovery planning.
- Evaluating operational flexibility, including remote working capabilities.
- Monitoring transition-related developments to ensure strategic adaptability.

DRIVING ENVIRONMENTAL RESPONSIBILITY

Risk Management

CTOS manages climate-related risks through our risk management framework. We treat climate change as a core business risk as it affects service continuity and business operations. We integrate climate considerations alongside other principal risks and apply the same level of leadership oversight.

Within this framework, we identify climate-related risks and opportunities that could reasonably affect CTOS' medium-to long-term impacts. These include physical risks arising from extreme weather events and longer-term climate trends, as well as transition risks linked to regulatory, market and societal shifts towards a low-carbon economy.



Physical Risks

Acute and chronic climate impacts that may disrupt operations, data centres and service continuity.



Transition Risks

Regulatory and policy changes, technological adaptation requirements and evolving customer and investor expectations.

Key Climate-related Opportunities

- Improve operational efficiency through energy optimisation and digitalisation.
- Strengthen market positioning through enhanced climate and ESG data, analytics and reporting solutions.

Physical Risks

Physical climate risks directly affect our ability to deliver reliable digital services. Extreme weather events and longer-term climate changes can disrupt the systems that customers rely on to make timely financial decisions. Thus, protecting our service continuity remains a core responsibility.

Acute Physical Risks

<p>Risk</p>	<ul style="list-style-type: none"> • Climate-driven business disruptions – Extreme weather events (floods, heatwaves) could impact CTOS' physical offices, data centres and operational continuity. • Third-party service disruptions – Acute weather events impacting cloud service providers, data centres or telecommunications vendors could indirectly affect CTOS' operational continuity.
<p>Mitigating Actions</p>	<ul style="list-style-type: none"> • Implement and regularly test business continuity and disaster recovery plans, including system redundancy and data backup arrangements. • Strengthen disaster recovery and remote work capabilities to ensure business continuity. • Leverage geographically distributed cloud infrastructure and third-party service providers to reduce concentration risk.



SUSTAINABILITY STATEMENT

DRIVING ENVIRONMENTAL RESPONSIBILITY

Chronic Physical Risks

Risk	<ul style="list-style-type: none"> Operational resilience pressures – Long-term increases in temperature and the frequency of extreme weather events may place sustained pressure on energy usage, cooling requirements and infrastructure resilience. Rising operating costs – Increased energy demand and adaptation requirements could lead to higher operating costs over time.
Mitigating Actions	<ul style="list-style-type: none"> Improve energy efficiency across offices and IT infrastructure, including optimisation of cooling systems and hardware usage. Work with service providers to enhance infrastructure resilience and energy efficiency. Monitor long-term climate trends as part of risk management and operational planning. Engage in carbon offset programmes.

Transition Risks

As economies shift toward lower-carbon models, regulators, customers and partners raise their expectations. These changes shape how CTOS operates, manages compliance and controls costs, making transition readiness essential to long-term resilience.

Regulatory & Policy Changes

Risk	<ul style="list-style-type: none"> Evolving climate-related regulations and disclosure requirements – Rising compliance costs due to new climate finance regulations, requiring additional investments in systems, processes and capabilities. Policy alignment risks – Failure to adapt internal policies and processes to evolving regulatory expectations could result in compliance or reputational risks.
Mitigating Actions	<ul style="list-style-type: none"> Monitor regulatory developments through risk management and compliance functions. Update internal policies, controls and reporting processes to align with applicable regulatory and disclosure standards, including IFRS S2 where relevant. Provide periodic training and briefings to management and relevant teams on regulatory developments.

Market & Stakeholder Expectations

Risk	<ul style="list-style-type: none"> Changing client and investor expectations – Increasing demand for strong ESG practices and climate transparency may influence procurement decisions, partnerships and investor confidence. Perceived greenwashing – Climate-related statements that are not supported by good governance, controls or measurable outcomes could lead to reduced stakeholder trust.
Mitigating Actions	<ul style="list-style-type: none"> Enhance sustainability disclosures and transparency in line with recognised frameworks. Engage with key stakeholders to understand evolving expectations and incorporate feedback where appropriate. Embed sustainability considerations into business practices and decision-making processes.

SUSTAINABILITY STATEMENT

DRIVING ENVIRONMENTAL RESPONSIBILITY

Technology & Operational Adaptation

<p>Risk</p>	<ul style="list-style-type: none"> System and process adaptation requirements – The need to support climate-related data, reporting and risk assessments may require enhancements to systems, data governance and analytics capabilities. Data centre energy intensity – Reliance on energy-intensive IT infrastructure, particularly where electricity is sourced from non-renewable energy, may increase operating costs and create pressure to transition to more energy-efficient or lower-carbon solutions.
<p>Mitigating Actions</p>	<ul style="list-style-type: none"> Invest in scalable and energy-efficient IT systems and digital infrastructure, including optimisation of data centre and cloud usage. Work with technology and cloud service providers to improve energy efficiency and resilience.

Metrics & Targets

Our climate metrics and targets hold us accountable for managing our environmental footprint. They help guide decisions, track progress and protect what our customers and communities rely on. By linking our net zero 2050 target to clear indicators, we assess performance across our operations and value chain.

Scope 1: Direct Emissions

Direct emissions arise from sources owned or controlled by CTOS, including company vehicles used to support business continuity and operational needs.

Since 2024, we discontinued the use of company cars, eliminating direct emissions for fuel consumption. Consequently, we recorded zero scope 1 emissions.

Scope 2: Indirect Emissions from Purchased Electricity

Electricity use is a key contributor to CTOS' environmental footprint, reflecting how we power our offices and digital services. From a 2022 baseline of 407.57 tCO₂e, we set an interim target to reduce Scope 2 emissions by 15% by 2025.

Progress & Impacts:

<p>Scope 2 emissions (tCO₂e):</p> <p>2023: 371.03 2024: 301.25 2025: 249.00</p>	<p>Emissions reduction vs. 2022:</p> <p>39% (vs target of 15%)</p>
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*Note: Scope 2 data is based on 2025, 343,369 kWh of electricity consumed across our offices and data centres.



SUSTAINABILITY STATEMENT

DRIVING ENVIRONMENTAL RESPONSIBILITY

Most of CTOS' carbon footprint sits beyond our direct operations, across the activities that enable us to serve customers and operate effectively. To better reflect this, we have expanded our emissions data to include key Scope 3 sources, capturing impacts beyond our direct operations.

Scope 3: Business Travel

Business travel is a key source of Scope 3 emissions for CTOS. While in-person engagement remains important for building trust and supporting customers, it also carries environmental impact. We therefore prioritise business travel as an area where we balance operational needs with emissions reduction. We tracked travel emissions using employee expense records and recognised emission factors to monitor progress and inform action.

Progress & Impacts:

Transport mode	2025 (tCO ₂ e)
Car: Employees' own car or reimbursed trips	21.03
Bus: Intercity and shuttle buses	0.18
Rail: Public trains and monorails	0.15
Flight: Domestic and regional air travel (ICAO calculator)	54.80
Subtotal	76.16

*Note: Activity data were extracted from claims records provided by Human Resources, and emission factors were sourced from DEFRA 2024. For flights, the International Civil Aviation Organisation (ICAO) Carbon Emissions Calculator was used.

DRIVING ENVIRONMENTAL RESPONSIBILITY

Outlook

Climate will continue to shape how people live, work and make decisions, including the expectations placed on businesses like CTOS. We remain focused on doing our part—protecting what our customers rely on today while steadily reducing our environmental impact.

Our transition pathway focuses on where CTOS can make the greatest difference, from how we power our digital infrastructure to how we strengthen emissions reporting. The pathway below highlights the key actions supporting our journey toward net zero and the foundations we are building to sustain progress over time.



Transforming Our Digital Infrastructure

The core of our environmental effort lies in modernising our technology. We are prioritising cloud-first data processing and a gradual shift away from on-premise data centres. By evolving our infrastructure, we ensure our operations are not only more resilient but also inherently more energy-efficient.



Embedding Low-Emission Ways of Working

Sustainability is becoming a natural part of our daily culture. We are encouraging smarter travel and work practices, including hybrid working and virtual engagement to reduce unnecessary business travel where feasible. Our goal is to balance our operational needs with a commitment to lower-emission habits.



Improving Energy Efficiency

We are committed to lowering energy use across our entire footprint. This includes targeted upgrades to our offices and data centres, alongside better monitoring and optimisation of our high-impact consumption areas. By focusing on where we use the most energy, we can make more meaningful reductions in our carbon footprint.



Strengthening Data Reporting

To stay accountable, we are focused on gathering better emissions data and expanding our coverage. By improving our Scope 1, 2, and priority Scope 3 data collection, we aim to provide more decision-useful disclosures that support our long-term targets and ensure our progress is transparent to all stakeholders.



SUSTAINABILITY STATEMENT

CSI Report

CTOS Digital Berhad

IFRS S1

Date & Time: 2026-04-28_10:16:34

FYE 31/12/2025

Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Product and Services	Number of self-check users	Million	5.0	—	Internal	
Product and Services	Average Credit Score	CTOS Credit Score	622	—	Internal	Data extracted is based on 2025 total volume.
Product and Services	Average monthly visitors to Knowledge Base Website	Million	2.7	—	Internal	
Customer Experience	Total number of customers (Key accounts and Commercial customers only)	Number	22,500	—	Internal	
Customer Experience	Number of customer complaints received	Number	465	—	Internal	
Customer Experience	Number of customer complaints resolved	Number	464	—	Internal	1 complaint escalated to external stakeholder. Pending stakeholder action for complaint resolution.
Customer Experience	Quality Score	Score	9272	—	Internal	
Customer Experience	Net Promoter Score (NPS)	Score	15.1	—	Internal	
Customer Experience	Number of customer service training conducted (Commercial customers only)	Number	4,722	—	Internal	
Data Privacy and Cybersecurity	Number of data loss event	Number	1	—	Internal	The data loss event in 2025 due to hardware failure had limited impact on customers and operations.
Data Privacy and Cybersecurity	Number of cyber security incidents	Number	1	—	Internal	One incident refers to a spear-phishing attack which was successfully contained and eradicated by our incident response team.

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CTOS Digital Berhad
IFRS S1

Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Data Privacy and Cybersecurity	Number of resolved cyber security incidents	Number	1	—	Internal	One incident refers to a spear-phishing attack which was successfully contained and eradicated by our incident response team.
Data Privacy and Cybersecurity	Number of confirmed personal data breaches	Number	0	—	Internal	
Data Privacy and Cybersecurity	Number of cyber security awareness training	Number	12	—	Internal	Slight decline due to no additional optional training conducted during the mandatory training period.
Data Privacy and Cybersecurity	Number of substantiated complaints breaches of customer privacy and losses of customer data	Number	0	—	Internal	
Financial Inclusion and Community Empowerment	Number of incidents of violations involving rights of indigenous people	Number	0	—	Internal	
Financial Inclusion and Community Empowerment	Number of community-registered not-for-profit organisations impacted	Number	0	—	Internal	In 2025, CTOS partnered with CIMB Foundation and Petronas Care for external financial literacy programmes.
Financial Inclusion and Community Empowerment	Total amount invested in the community where the target beneficiaries are external to the listed issuer	MYR	332,830	—	Internal	
Financial Inclusion and Community Empowerment	Number of beneficiaries of the investment in communities by segment	Number	2	—	Internal	
Financial Inclusion and Community Empowerment	Quantifiable output/outcome of specific results, achievements or benefits of community investments (Individual)	Number	36,869	—	Internal	



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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Employee Welfare & Well-Being	Number of training programmes for workers on occupational health and safety	Number	2	—	Internal	
Employee Welfare & Well-Being	Number of employees trained on health and safety standards	Number	6	—	Internal	In 2025, we reviewed the composition of the occupational health and safety committee (OSH), and prioritised those requiring to be certified as OSH Coordinators, Fire Marshal and Floor Wardens.
Employee Welfare & Well-Being	Workers covered by an occupational health and safety management system	Percentage	100%	—	Internal	
Employee Welfare & Well-Being	Number of work-related injuries	Number	0	—	Internal	
Employee Welfare & Well-Being	Number of work-related ill health	Number	0	—	Internal	
Employee Welfare & Well-Being	Number of work-related fatalities	Number	0	—	Internal	
Employee Welfare & Well-Being	Lost time incident rate	Rate	0	—	Internal	
Employee Welfare & Well-Being	Number of substantiated complaints concerning human rights violations	Number	0	—	Internal	
Employee Welfare & Well-Being	Number of employees taking parental leave	Number	22	—	Internal	
Career Development	Average training days per employee	Days	2.80	—	Internal	
Career Development	Training investment per employee	MYR	908.2	—	Internal	

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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Career Development	Total training hours for the employees	Hours	11,482.0	—	Internal	In 2025, training was more targeted and cost-conscious, focusing on critical areas such as optimising performance and shaping workplace culture.
Career Development	Average total hours of training per employee	Hours	22.1	—	Internal	
Career Development	Average total hours of training per employee - Female	Hours	18.0	—	Internal	
Career Development	Average total hours of training per employee - Male	Hours	27.7	—	Internal	
Career Development	Average total hours of training per employee - Senior Management	Hours	21.8	—	Internal	
Career Development	Average total hours of training per employee - Middle Management	Hours	28.3	—	Internal	
Career Development	Average total hours of training per employee - Executive	Hours	23.0	—	Internal	
Career Development	Average total hours of training per employee - Non-Executive	Hours	0.9	—	Internal	
Career Development	Number of employee upskilling programmes	Number	15	—	Internal	
Career Development	Employees receiving regular performance and career development reviews	Percentage	100%	—	Internal	
Career Development	Number of discrimination incidents	Number	0	—	Internal	
Career Development	Number of corrective actions regarding discrimination incidents taken	Number	0	—	Internal	



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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Career Development	Ratio of basic salary and remuneration (male to female)	Ratio	1.3 : 1	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Female (43%)	Number (Percentage)	287 (57%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Male (43%)	Number (Percentage)	222 (43%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Senior Management, Female	Number (Percentage)	7 (41%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Senior Management, Male	Number (Percentage)	10 (58%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Middle Management, Female	Number (Percentage)	60 (47%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Middle Management, Male	Number (Percentage)	69 (53%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Executive, Female	Number (Percentage)	186 (58%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Executive, Male	Number (Percentage)	136 (42%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Non-Executive, Female	Number (Percentage)	44 (86%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Non-Executive, Male	Number (Percentage)	7 (14%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Senior Management, <30	Number (Percentage)	0 (0%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Senior Management, 30-50	Number (Percentage)	11 (65%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Senior Management, >50	Number (Percentage)	6 (35%)	—	Internal	

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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Middle Management, <30	Number (Percentage)	3 (2%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Middle Management, 30-50	Number (Percentage)	121 (94%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Middle Management, >50	Number (Percentage)	5 (4%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Executive, <30	Number (Percentage)	123 (38%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Executive, 30-50	Number (Percentage)	192 (60%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Executive, >50	Number (Percentage)	7 (2%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Non-Executive, <30	Number (Percentage)	20 (39%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Non-Executive, 30-50	Number (Percentage)	31 (61%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Non-Executive, >50	Number (Percentage)	0 (0%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Full-time	Number (Percentage)	501 (96%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Breakdown of employees - Temporary	Number (Percentage)	18 (4%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Category of employees - Malaysian	Number (Percentage)	505 (97%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Category of employees - Non-Malaysian	Number (Percentage)	14 (3%)	-	Internal	
Diversity, Equity and Inclusion (DEI)	Senior management employees - Female	Number (Percentage)	7 (41%)	-	Internal	



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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Diversity, Equity and Inclusion (DEI)	Senior management employees - Male	Number (Percentage)	90 (59%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Board of Directors - Female	Number (Percentage)	3 (60%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Board of Directors - Male	Number (Percentage)	2 (40%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Board of Directors - Independent Directors	Number (Percentage)	4 (80%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Board of Directors - <30	Number (Percentage)	0 (0%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Board of Directors - 30-50	Number (Percentage)	0 (0%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Board of Directors - >50	Number (Percentage)	5 (100%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Employees with disabilities	Number	0	—	Internal	
Diversity, Equity and Inclusion (DEI)	Number of Senior Management are Local Communities	Number	15	—	Internal	
Diversity, Equity and Inclusion (DEI)	Female in technical position	Number (Percentage)	26 (29%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Total number of new hires - Senior Management	Number (Percentage)	7 (4%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Total number of new hires - Middle Management	Number (Percentage)	38 (20%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Total number of new hires - Executive	Number (Percentage)	132 (70%)	—	Internal	
Diversity, Equity and Inclusion (DEI)	Total number of new hires - Non-Executive	Number (Percentage)	12 (6%)	—	Internal	

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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Diversity, Equity and Inclusion (DEI)	Average employee turnover rate - Female	Percentage	1.2%	—	Internal	
Diversity, Equity and Inclusion (DEI)	Average employee turnover rate - Male	Percentage	1.3%	—	Internal	
Diversity, Equity and Inclusion (DEI)	Average employee turnover rate - Senior Management	Percentage	0.2%	—	Internal	
Diversity, Equity and Inclusion (DEI)	Average employee turnover rate - Middle Management	Percentage	0.4%	—	Internal	
Diversity, Equity and Inclusion (DEI)	Average employee turnover rate - Executive	Percentage	1.8%	—	Internal	
Diversity, Equity and Inclusion (DEI)	Average employee turnover rate - Non-Executive	Percentage	0.1%	—	Internal	
Diversity, Equity and Inclusion (DEI)	Employee turnover rate	Percentage	2.5%	—	Internal	
Governance, Transparency and Accountability	Percentage of operations assessed for corruption	Percentage	100%	—	Internal	
Governance, Transparency and Accountability	Number of confirmed incidents of corruption and action taken	Number	0	—	Internal	
Governance, Transparency and Accountability	Number of confirmed cases where employees were dismissed/disciplined for corruption	Number	0	—	Internal	
Governance, Transparency and Accountability	Number of confirmed cases where business partners/suppliers were terminated due to violations related to corruption	Number	0	—	Internal	



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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Governance, Transparency and Accountability	Number of staff disciplined or dismissed due to non-compliance with anti-corruption policy/policies	Number	0	—	Internal	
Governance, Transparency and Accountability	Number and percentage of governance body members participated in anti-corruption briefing/policies and procedures	Number (Percentage)	6 (100%)	—	Internal	
Governance, Transparency and Accountability	Number and percentage of governance body members received training in anti-corruption briefing/policies and procedures	Number (Percentage)	6 (100%)	—	Internal	
Governance, Transparency and Accountability	Number and percentage of employees received training in anti-corruption briefing/policies and procedures	Number (Percentage)	519 (100%)	—	Internal	
Governance, Transparency and Accountability	Number and percentage of employees received training in anti-corruption briefing/policies and procedures - Senior Management	Number (Percentage)	17 (3.3%)	—	Internal	
Governance, Transparency and Accountability	Number and percentage of employees received training in anti-corruption briefing/policies and procedures - Middle Management	Number (Percentage)	129 (24.9%)	—	Internal	
Governance, Transparency and Accountability	Number and percentage of employees received training in anti-corruption briefing/policies and procedures - Executive	Number (Percentage)	322 (62.0%)	—	Internal	

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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Governance, Transparency and Accountability	Number and percentage of employees received training in anti-corruption briefing/policies and procedures - Non-Executive	Number (Percentage)	51 (9.8%)	—	Internal	
Governance, Transparency and Accountability	Number of cost of fines, penalties or settlements in relation to corruption	MYR	0	—	Internal	
Governance, Transparency and Accountability	Number of legal actions pending/completed regarding anti-competitive behavior and violations of anti-trust and monopoly	Number	0	—	Internal	
Governance, Transparency and Accountability	Total tax contribution	MYR	6,453,199	—	Internal	
Governance, Transparency and Accountability	Number of misconduct-/malpractice reports received and percentage resolved	Number (Percentage)	25 (100%)	—	Internal	
Governance, Transparency and Accountability	Number of investigations conducted	Number	25	—	Internal	
Governance, Transparency and Accountability	Percentage of compliances to operating laws & regulations	Percentage	100%	—	Internal	
Governance, Transparency and Accountability	Penalty, private or public reprimand by Regulators	MYR	0	—	Internal	
Governance, Transparency and Accountability	Regulatory non-compliances	Number	0	—	Internal	
Governance, Transparency and Accountability	Number of days between the date of notice and date of meeting	Days	56	—	Internal	
Governance, Transparency and Accountability	Annual audit by the Registrar Office of the Credit Reporting Agencies for CRA license renewal	Status	Pass	—	Internal	



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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
Governance, Transparency and Accountability	Annual audit by an independent auditor for continuous access to BNM	Status	Satisfactory	—	Internal	
Supply Chain	Proportion of spending on local suppliers	Percentage	84.94%	—	Internal	
Supply Chain	Type of suppliers engaged - Local	Number	532	—	Internal	
Supply Chain	Type of suppliers engaged - International	Number	39	—	Internal	
Supply Chain	Type of suppliers engaged - Total	Number	571	—	Internal	

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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
GHG Emissions and Energy Consumption	Direct (Scope 1) GHG Emissions	1CO2e	0	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Total	1CO2e	248.00	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Ipoh	1CO2e	6.73	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Johor	1CO2e	3.54	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Klang	1CO2e	13.87	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Kuantan	1CO2e	9.54	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Melaka	1CO2e	11.65	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Penang	1CO2e	14.59	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Puchong	1CO2e	11.32	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Sabah	1CO2e	12.57	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Sarawak	1CO2e	3.74	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Celcom Digi Tower	1CO2e	58.00	—	Internal	
GHG Emissions and Energy Consumption	Energy Indirect (Scope 2) GHG Emissions - Data Centre Cyberjaya	1CO2e	103.44	—	Internal	



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Sustainability Matter	Metric	Measurement Unit	2025	Target	Assurance	Remarks
GHG Emissions and Energy Consumption	Indirect (Scope 2) GHG Emissions Intensity	1CO2e per FTE	0.48	—	Internal	
GHG Emissions and Energy Consumption	Reduction of GHG Emissions Scope 2	Percentage	39%	—	Internal	
GHG Emissions and Energy Consumption	Other Indirect (Scope 3) GHG Emissions - Business Travel	1CO2e	7637	—	Internal	
GHG Emissions and Energy Consumption	Other Indirect (Scope 3) GHG Emissions - Employee Commute	1CO2e	38532	—	Internal	
GHG Emissions and Energy Consumption	Indirect (Scope 3) GHG Emissions Intensity	1CO2e per FTE	0.89	—	Internal	
GHG Emissions and Energy Consumption	Total GHG Emissions Intensity (Scope 2 + 3)	1CO2e	1.37	—	Internal	
Environmental Stewardship	Energy consumption within the organization	MW	343.37	—	Internal	
Environmental Stewardship	Energy Intensity	MWh per FTE	0.66	—	Internal	
Environmental Stewardship	Reduction of energy consumption	Percentage	51%	—	Internal	
Environmental Stewardship	Water consumption	Megalitres	1.02	—	Internal	Water consumption figures in 2024 is calculated using the tariff rates provided by Suruhanjaya Perkhidmatan Air Negara (SPAN) while the 2025 figure is calculated based on meter reading from invoices.

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ADDITIONAL SUSTAINABILITY INFORMATION

Sustainability Performance Data

PRODUCT EXCELLENCE & INNOVATION			
Disclosures	2023	2024	2025
Product and Services			
Number of self-check users (million)	3.64	4.4	5.0
Average Credit Score	684	597	622
Average monthly visitors to Knowledge Base Website (million)	2.11	2.6	2.7
CUSTOMER EXCELLENCE			
Disclosures	2023	2024	2025
Total number of customers (Key accounts and commercial customers only)	22,000	22,500	22,100
Number of customer complaints received	225	354	465
Number of customer complaints resolved	225	350	464
Quality Score	92.67	93.51	97.72
Net Promoter Score (NPS)	+14.4	+23.1	+15.1
Number of customer service training conducted	4,373	4,528	4,722
DATA PRIVACY AND CYBER SECURITY			
Disclosures	2023	2024	2025
Number of data loss event	0	0	1*
Number of cyber security incidents	0	0	1
Number of resolved cyber security incidents	0	0	1**
Number of confirmed personal data breaches	0	0	0
Number of cyber security awareness training	8	14	12***
Number of substantiated complaints breaches of customer privacy and losses of customer data	0	0	0

* The data loss event in 2025 due to hardware failure had limited impact on customers and operations.

** One incident refers to a spear-phishing attack which was successfully contained and eradicated by our incident response team.

*** Slight decline due to no additional optional training conducted during the mandatory training period.



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FINANCIAL INCLUSION AND COMMUNITY EMPOWERMENT			
Disclosures	2023	2024	2025
Total amount invested in the community where the target beneficiaries are external to the listed issuer (RM)	219,588	307,489	332,830
Number of beneficiaries of the investment in communities	1	1	2
Quantifiable output/outcome of specific results, achievements or benefits of community investments	25,000	16,000	36,869
Number of communities/registered not-for-profit organisations impacted	1 (old folks home)	100 (B40 students in primary school)	0*
Number of Incidents of Violations Involving Rights of Indigenous Peoples	0	0	0

*In 2025, CTOS partnered with CIMB Foundation and Petronas Care for external financial literacy programmes.

EMPLOYEE WELFARE AND WELL-BEING			
Disclosures	2023	2024	2025
Number of training programmes for workers on occupational health and safety	2	2	2
Number of employees trained on health and safety standards	351	23*	6**
Number of workers covered by an occupational health and safety management system (%)	100	100	100
Number of work-related injuries	0	0	0
Number of work-related ill health	0	0	0
Number of work-related fatalities	0	0	0
Lost time incident rate	0	0	0
Number of substantiated complaints concerning human rights violations	0	0	0
Employees taking parental leave (Number of employees)	36	34	22

*In 2024, we focused on enrolling newly identified Fire Marshals and Floor Wardens for technical training & certification in First AID, CPR & AED. This certification is valid for 3 years for the 23 trained employees.

**In 2025, we reviewed the composition of the occupational health and safety committee (OSH), and prioritised those requiring to be certified as OSH Coordinators, Fire Marshal and Floor Wardens.

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TALENT DEVELOPMENT AND GROWTH			
Disclosures	2023	2024	2025
Average training days per employee	3.04	3.60	2.80
Training investment per employee (RM)	1,047.52	1,162.7	908.2
Total training hours for the employees	15,407.5	17,584.4*	11,482.0**
Average total hours of training per employee (person hours)	24.3	28.8	22.1
Average Total Hours of Training per Employee by Gender			
<i>Female</i>	19.6	23.8	18.0
<i>Male</i>	29.6	35.2	27.7
Average Total Hours of Training per Employee by Job Level			
<i>Senior Management</i>	21.2	11.1	21.8
<i>Middle Management</i>	33.0	40.0	28.3
<i>Executive</i>	25.6	32.3	23.0
<i>Non-Executive</i>	9.4	2.0	0.9
Number of employee upskilling programmes	10	10	15
Employees receiving regular performance and career development reviews (%)	100	100	100
Number of discrimination incidents	0	0	0
Number of corrective actions regarding discrimination incidents taken	0	0	0
Ratio of basic salary and remuneration (male to female)	1:7:1	1:6:1	1.3:1

*2024 recorded higher training hours mainly due to large-scale initiatives such as Lean Six Sigma and coaching (~3,000 hours), as well as higher BDO hiring, with 164 new joiners attending sales training compared to 94 in 2025 (approximately additional ~2,000 hours for 2024).

**In 2025, training was more targeted and cost-conscious, focusing on critical areas such as optimising performance and shaping workplace culture.

DIVERSITY, EQUITY AND INCLUSION (DEI)			
Disclosures	2023	2024	2025
Breakdown of Employees by Gender (Number & %)			
<i>Female</i>	301 (53%)	344 (56%)	297 (57%)
<i>Male</i>	268 (47%)	267 (44%)	222 (43%)
<i>Senior Management</i>			
<i>Female</i>	23%	29%	7 (41%)
<i>Male</i>	77%	71%	10 (59%)
<i>Middle Management</i>			
<i>Female</i>	45%	48%	60 (47%)
<i>Male</i>	55%	52%	69 (53%)



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ADDITIONAL SUSTAINABILITY INFORMATION

DIVERSITY, EQUITY AND INCLUSION (DEI)				
Disclosures		2023	2024	2025
Executive				
	<i>Female</i>	51%	56%	186 (58%)
	<i>Male</i>	49%	44%	136 (42%)
Non-Executive				
	<i>Female</i>	75%	76%	44 (86%)
	<i>Male</i>	25%	24%	7 (14%)
Breakdown of Employees by Age Group (Number & %)				
Senior Management				
	<30	0%	0%	0%
	30-50	73%	76%	11 (65%)
	>50	27%	24%	6 (35%)
Middle Management				
	<30	7%	5%	3 (2%)
	30-50	89%	90%	121 (94%)
	>50	4%	5%	5 (4%)
Executive				
	<30	46%	47%	123 (38%)
	30-50	53%	52%	192 (60%)
	>50	1%	1%	7 (2%)
Non-Executive				
	<30	61%	62%	20 (39%)
	30-50	39%	38%	31 (61%)
	>50	0%	0%	0 (0%)
Breakdown of Employees by Employment Type (Number & %)				
	<i>Full-Time</i>	521 (92%)	559 (91.5%)	501 (96%)
	<i>Temporary</i>	48 (8%)	52 (8.5%)	18 (4%)
Category of Employees (Number & %)				
	<i>Malaysian</i>	98%	97%	505 (97%)
	<i>Non-Malaysian</i>	2%	3%	14 (3%)
Senior Management Employees (Number & %)				
	<i>Female</i>	5 (23%)	6 (29%)	7 (41%)
	<i>Male</i>	17 (77%)	15 (71%)	10 (59%)
Board of Directors (Number & %)				
By Gender				
	<i>Female</i>	3 (50%)	3 (50%)	3 (60%)
	<i>Male</i>	3 (50%)	3 (50%)	2 (40%)
	<i>Independent Directors</i>	4 (67%)	4 (67%)	4 (80%)

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ADDITIONAL SUSTAINABILITY INFORMATION

DIVERSITY, EQUITY AND INCLUSION (DEI)				
Disclosures		2023	2024	2025
<i>By Age Group</i>				
	<30	0%	0%	0 (0%)
	30-50	0%	0%	0 (0%)
	>50	100%	100%	5 (100%)
Employees with disabilities (%)		0	0	0
Number of Senior Management are Local Communities		15	15	15
Female in Technical Position (Number & %)		28%	28%	26 (25%)
Total Number of New Hires by Job Level (%)				
	Senior Management	3 (2%)	4 (2%)	7 (4%)
	Middle Management	16 (9%)	37 (18%)	38 (20%)
	Executive	122 (66%)	126 (61%)	132 (70%)
	Non-Executive	42 (23%)	41 (20%)	12 (6%)
Average Employee Turnover Rate (%)				
	Female	1.0	0.9	1.2
	Male	1.1	1.1	1.3
Average Turnover Rate by Job Level (%)				
	Senior Management	0.02	0.05	0.2
	Middle Management	0.10	0.29	0.4
	Executive	1.90	1.62	1.8
	Non-Executive	0.10	0.05	0.1
Employee Attrition Rate (%)		2.1	2.01	2.5

GOVERNANCE, INTEGRITY AND TRANSPARENCY				
Disclosures		2023	2024	2025
Percentage of operations assessed for corruption (%)		75	100	100
Number of confirmed incidents of corruption and action taken		0	0	0
Number of confirmed cases where employees were dismissed/ disciplined for corruption		0	0	0
Number of confirmed cases where business partners/suppliers were terminated due to violations related to corruption		0	0	0
Number of staff disciplined or dismissed due to non-compliance with anti-corruption policy/policies		0	0	0
Number and percentage of governance body members participated in anti-corruption briefing/policies and procedures		0	0	6 (100%)
Number and percentage of governance body members received training in anti-corruption briefing/policies and procedures		0	0	6 (100%)
Number and percentage of employees participated in anti-corruption briefing/policies and procedures		569 (100%)	611 (100%)	519 (100%)



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ADDITIONAL SUSTAINABILITY INFORMATION

GOVERNANCE, INTEGRITY AND TRANSPARENCY			
Disclosures	2023	2024	2025
Number and percentage of employees received training in anti-corruption briefing/policies and procedures by employee category			
Senior Management	22 (3.9%)	21 (3.4%)	17 (3.3%)
Middle Management	100 (17.6%)	122 (20%)	129 (24.9%)
Executive	355 (62.4%)	380 (62.2%)	322 (62.0%)
Non-Executive	92 (16.1%)	88 (14.4%)	51 (9.8%)
Number of cost of fines, penalties or settlements in relation to corruption (RM)	0	0	0
Tax Strategy			
Total Tax Contribution (RM)	5,529,715	6,942,014	6,453,199
Anti-Competitive Behaviour			
Number of legal actions pending/completed regarding anti-competitive behaviour and violations of anti-trust and monopoly	0	0	0
Compliances			
Number of misconduct/malpractice reports received and percentage resolved	0	1	25 (100%)
Number of investigations conducted	0	1	25
% of compliances to operating laws & regulations	100	100	100
Penalty, private or public reprimand by Regulators	0	0	0
Regulatory non-compliances	0	0	0
Number of days between the date of notice and date of meeting	30	36	56
Audit			
Annual audit by the Registrar Office of the Credit Reporting Agencies for CRA licence renewal	Pass	Pass	Pass
Annual audit by an independent auditor for continuous access to BNM	Satisfactory	Satisfactory	Satisfactory

RESPONSIBLE SUPPLY CHAIN			
Disclosures	2023	2024	2025
Proportion of spending on local suppliers (%)	90	83.9	84.9
Type of suppliers engaged			
Local Suppliers			532
International Suppliers			39
Total Number of Suppliers			571

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CLIMATE ACTION AND ENVIRONMENTAL FOOTPRINT			
Disclosures	2023	2024	2025
Direct (Scope 1) GHG Emissions (tCO ₂ e)	0.65	0.00	0.00
Indirect (Scope 2) GHG Emissions (tCO ₂ e)	371.03	301.25	249.00
<i>Ipoh</i>			6.73
<i>Johor</i>			3.54
<i>Klang</i>			13.87
<i>Kuantan</i>			9.54
<i>Melaka</i>			11.65
<i>Penang</i>			14.59
<i>Puchong</i>			11.32
<i>Sabah</i>			12.57
<i>Sarawak</i>			3.74
<i>Celcom Digi Tower</i>			58.00
<i>Data Centre Cyberjaya</i>			103.44
Indirect (Scope 2) GHG Emissions Intensity (tCO ₂ e/FTE)	0.64	0.49	0.48
Reduction of Scope 2 GHG Emissions (%)	9	26	39
Other Indirect (Scope 3) GHG Emissions (tCO ₂ e)			
<i>Business Travel</i>		80.03	76.17
<i>Employee Commute</i>		452.29	385.12
Indirect (Scope 3) GHG Emissions Intensity (Total emissions/FTE)		0.87	0.89
Total GHG Emissions Intensity (Scope 2 + 3)		1.36	1.37
Energy			
Energy consumption within the organisation (MWh)	634.24	514.96	343.37
Energy intensity (MWh/FTE)	1.09	0.84	0.66
Reduction of energy consumption (%)	9	26	51
Water			
Water consumption (Megalitres)	37.5	5.36	1.02*

*Water consumption figures in 2024 is calculated using the tariff rates provided by Suruhanjaya Perkhidmatan Air Negara (SPAN) while the 2025 figure is calculated based on meter reading from invoices.



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GHG Emissions Methodology

Reporting Scopes	
Organisational Boundary	<p>CTOS adopts the operational control approach to consolidate and report its GHG emissions. Under this approach, CTOS accounts for 100% of emissions from operations where it has full authority to introduce and implement operating policies. This includes all entities over which CTOS Digital Berhad and its subsidiaries exercise operational control.</p> <p>For the full list of the Group's operations, please refer to pages 14 to 15</p>
Operational Boundary	<p>CTOS is reporting its Scope 1, Scope 2 and Scope 3 Emissions.</p> <ul style="list-style-type: none"> • Scope 1: Direct Emissions occur from sources that are owned or controlled by the Group. We report Scope 1 Emissions that are coming from company-owned vehicles. • Scope 2: Indirect Emissions from the generation of purchased electricity consumed by CTOS across all our offices. • Scope 3: Other indirect emissions that occur across CTOS' value chain which are not included in Scope 2, including activities such as business travel, employee commuting and waste generated in operations.

Base Year

Our base year is the FY2022, covering the emission for Scope 1 and 2.

Emission Factors

Scope	Emission Factors
Scope 1	Greenhouse Gas Reporting: Conversion Factors 2024. Published by UK Gov Department for Energy Security and Net Zero. Update 30 October 2024.
Scope 2	Grid Emission Factor (GEF) in Malaysia, 2017 -2021 published by Malaysia Energy Security Commission, November 2024.

Calculation Methodology

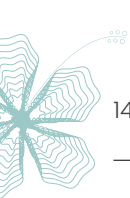
Scope	Calculation Methodology
Scope 1	Total amount of fuel consumed (litre) x average fuel-based vehicle specific emission factor (tCO ₂ e/litre)
Scope 2	Total amount of electricity purchased across all branches & buildings (kWh) x grid emission factor (tCO ₂ e/kWh)
Scope 3	Business travel and employee commuting: Distance travelled (km) by transport mode x transport-specific emission factor (tCO ₂ e/km).

ADDITIONAL SUSTAINABILITY INFORMATION

GRI Content Index

The CTOS Digital Integrated Report and Sustainability Statement were prepared in reference to GRI Standards 2021.

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
GRI 2: General Disclosures 2021	2-1 Organisational details	Overview of CTOS, page 6-19
	2-2 Entities included in the organisation's sustainability reporting	About this Report, page 4-5
	2-3 Reporting period, frequency and contact point	About this Report, page 4-5
	2-5 External assurance	About this Report, page 5
	2-6 Activities, value chain and other business relationships	Overview of CTOS, page 6-19
	2-7 Employees	Sustainability Statement: Diversity, Equity, and Inclusion (DEI), page 93 Sustainability Performance Data, page 137 to 139
	2-8 Workers who are not employees	Sustainability Statement: Diversity, Equity, and Inclusion (DEI), page 138
	2-9 Governance structure and composition	Corporate Governance Overview Statement, page 167 Sustainability Statement: Governance, Integrity and Accountability, page 102-103
	2-10 Nomination and selection of the highest governance body	Directors' Qualification, Fit and Proper Policy, https://ctosdigital.com/corporate-governance/fit-and-proper-policy/
	2-11 Chair of the highest governance body	Corporate Governance Overview Statement, page 159 and 167 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/
	2-12 Role of the highest governance body in overseeing the management of impacts	Corporate Governance Overview Statement, page 167 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/
	2-13 Delegation of responsibility for managing impacts	Corporate Governance Overview Statement, page 167 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Statement: Governance, Integrity, and Accountability, page 102 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/
	2-15 Conflicts of interest	Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/ Board of Directors Profile, page 160 - 163



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GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
GRI 2: General Disclosures 2021	2-16 Communication of critical concerns	Sustainability Statement: Governance, Integrity, and Accountability, page 102 - 103
	2-17 Collective knowledge of the highest governance body	Corporate Governance Overview Statement, page 184 - 187
	2-18 Evaluation of the performance of the highest governance body	Corporate Governance Overview Statement, page 183 - 184
	2-19 Remuneration policies	Directors' Remuneration Policy, https://ctosdigital.com/corporate-governance/directors-remuneration-policy/
	2-20 Process to determine remuneration	Directors' Remuneration Policy, https://ctosdigital.com/corporate-governance/directors-remuneration-policy/
	2-21 Annual total compensation ratio	Notes to the Remuneration of Group's Senior Management, page 189
	2-22 Statement on sustainable development strategy	Sustainability Statement: Our Sustainability Approach, page 69 - 71
	2-23 Policy commitments	Code Of Business Conduct and Ethics, https://ctosdigital.com/corporate-governance/code-of-business-conduct-ethics/
	2-24 Embedding policy commitments	Sustainability Statement page 70 and 105
	2-25 Processes to remediate negative impacts	Whistleblowing Policy, https://ctosdigital.com/wp-content/uploads/2023/06/Whistleblowing-Policy.pdf Code Of Business Conduct and Ethics, https://ctosdigital.com/corporate-governance/code-of-business-conduct-ethics/
	2-26 Mechanisms for seeking advice and raising concerns	Whistleblowing Policy, https://ctosdigital.com/wp-content/uploads/2023/06/Whistleblowing-Policy.pdf Code Of Business Conduct and Ethics, https://ctosdigital.com/corporate-governance/code-of-business-conduct-ethics/
	2-27 Compliance with laws and regulations	Sustainability Statement: Governance, Integrity, Accountability, page 107 - 108
	2-28 Membership associations	Sustainability Statement: Our Sustainability Approach, page 71
	2-29 Approach to stakeholder engagement	Stakeholder Engagement, page 30-35
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Material Matters, page 36-41
	3-2 List of material topics	
DATA PRIVACY & CYBER SECURITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Data Privacy and Cyber Security, page 72-73
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Sustainability Statement: Data Privacy and Cyber Security, page 74

ADDITIONAL SUSTAINABILITY INFORMATION

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
GOVERNANCE, INTEGRITY AND ACCOUNTABILITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Governance, Integrity & Accountability, page 102 - 103
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Sustainable Statement: Sustainability Performance Data, page 139
	205-2 Communication and training about anti-corruption policies and procedures	Anti-Bribery and Anti-Corruption (ABAC) Policy, https://ctosdigital.com/corporate-governance/anti-bribery-and-corruption-policy/ . Sustainability Statement: Governance, Integrity & Accountability, page 107
	205-3 Confirmed incidents of corruption and actions taken	Sustainable Statement: Sustainability Performance Data, page 139
GRI 207: Tax 2019	207-1 Approach to tax	Notes to the Financial Statements, page 254
	207-2 Tax governance, control, and risk management	Notes to the Financial Statements, page 254
RESPONSIBLE SUPPLY CHAIN		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Responsible Supply Chain, page 112
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Sustainable Statement: Sustainability Performance Data, page 140
	201-3 Defined benefit plan obligations and other retirement plans	Notes to the Financial Statements, page 255
FINANCIAL INCLUSION AND COMMUNITY EMPOWERMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Financial Inclusion and Community Empowerment, page 86
GRI 203: Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	Sustainability Statement: Financial Inclusion and Community Empowerment, page 87 - 89
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Sustainability Statement: Financial Inclusion and Community Empowerment, page 87 - 89
DIVERSITY, EQUITY, AND INCLUSION ("DEI")		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Diversity, Equity, and Inclusion (DEI), page 91
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	Sustainability Statement: Sustainable Performance Data page 139
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Sustainability Statement: Diversity, Equity, and Inclusion (DEI), page 93 Sustainable Statement: Sustainability Performance Data, page 139
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Sustainability Statement: Sustainability Performance Data page 137 - 139
	405-2 Ratio of basic salary and remuneration of women to men	Sustainability Statement: Sustainability Performance Data page 137



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ADDITIONAL SUSTAINABILITY INFORMATION

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
DIVERSITY, EQUITY, AND INCLUSION (“DEI”)		
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Sustainability Statement: Sustainable Performance Data page 137
TALENT DEVELOPMENT AND GROWTH		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Talent Development & Growth, page 95
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Sustainability Statement: Employee Welfare and Well-Being, page 101
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Sustainability Statement: Talent Development & Growth, page 96
	404-2 Programs for upgrading employee skills and transition assistance programs	Sustainability Statement: Talent Development & Growth, page 96 - 97
	404-3 Percentage of employees receiving regular performance and career development reviews	Sustainability Statement: Sustainability Performance Data, page 137
EMPLOYEE WELFARE AND WELL-BEING		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Employee Welfare and Well-Being, page 98
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Sustainability Statement: Sustainability Performance Data, page 137
GRI 401: Employment 2016	401-3 Parental leave	Sustainability Statement: Sustainability Performance Data, page 136
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Sustainability Statement: Employee Welfare and Well-Being, page 98 and 100
	403-3 Occupational health services	Sustainability Statement: Employee Welfare and Well-Being, page 98 and 100
	403-5 Worker training on occupational health and safety	Sustainability Statement: Employee Welfare and Well-Being, page 98 and 100
	403-6 Promotion of worker health	Sustainability Statement: Employee Welfare and Well-Being, page 98 - 100
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Sustainability Statement: Employee Welfare and Well-Being, page 98 and 100
	403-8 Workers covered by an occupational health and safety management system	Sustainability Statement: Employee Welfare and Well-Being, page 98 and 100 Sustainability Statement: Sustainability Performance Data, page 136
	403-9 Work-related injuries	Sustainability Statement: Sustainability Performance Data, page 136
	403-10 Work-related ill health	Sustainability Statement: Sustainability Performance Data, page 136

ADDITIONAL SUSTAINABILITY INFORMATION

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
CLIMATE ACTION AND ENVIRONMENTAL FOOTPRINT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Statement: Climate Action and Environmental Footprint, page 114 - 121
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	Sustainability Statement: Climate Action and Environmental Footprint, page 119
	302-3 Energy intensity	Sustainability Statement: Sustainable Statement: Sustainable Performance Data, page 141
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Sustainability Statement: Climate Action and Environmental Footprint, page 119
	305-2 Energy indirect (Scope 2) GHG emissions	Sustainability Statement: Climate Action and Environmental Footprint, page 119
	305-4 GHG emissions intensity	Sustainability Statement: Sustainable Statement: Sustainable Performance Data, page 141
	305-5 Reduction of GHG emissions	Sustainability Statement: Climate Action and Environmental Footprint, page 119
GRI 303: Water and Effluents 2018	303-5 Water consumption	Sustainability Statement: Bursa Prescribed Table, page 134



SUSTAINABILITY STATEMENT

ADDITIONAL SUSTAINABILITY INFORMATION

IFRS S2 Content Index

INDICATOR	DESCRIPTION	PAGE REFERENCE
GOVERNANCE		
6 (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 climate-related risks and opportunities. Specifically, the entity shall identify that body(s) or individual(s) and disclose information about</i>	
6 (a) (i)	How responsibilities for climate-related risks and opportunities are reflected in terms of reference, mandates, role descriptions and other related policies applicable to that body(s) or individual(s).	page 114
6 (a) (ii)	How the body(s) or individual(s) determined whether appropriate skills and competencies will be developed to oversee strategies designed to respond to climate-related risks and opportunities.	page 115
6 (a) (iii)	How and how often the body(s) or individual(s) is informed about climate-related risks and opportunities.	page 115
6 (a) (iv)	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.	page 115 - 116
6 (a) (v)	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, including whether and how related performance metrics are included in remuneration policies	page 114 - 115
6 (b)	<i>To achieve this objective, an entity shall disclose information about 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>	
6 (b) (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.	page 114
6 (b) (ii)	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.	
STRATEGY		
9 (a)	The climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects.	page 116
9 (b)	The current and anticipated effects of those climate-related risks and opportunities on the entity's business model and value chain.	page 117 - 119
9 (c)	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.	page 116

ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
STRATEGY		
9 (d)	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.	The Group provides qualitative discussion of climate-related risks and opportunities. Quantitative current and anticipated financial effects, including integration into financial planning and resilience of strategy to climate related changes will be progressively enhanced as data, methodologies and systems mature.
9 (e)	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.	
CLIMATE-RELATED RISKS AND OPPORTUNITIES		
10	<i>An entity shall disclose information that enables users of general-purpose financial reports to understand the climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects. Specifically, the entity shall:</i>	
10 (a)	Describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects.	page 117 - 119
10 (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.	page 117 - 119
10 (c)	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.	The Group will identify the time horizons and its definitions in the upcoming reporting cycle.
10 (d)	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.	
BUSINESS MODEL AND VALUE CHAIN		
13	<i>An entity shall disclose information that enables users of general-purpose financial reports to understand the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain. Specifically, the entity shall disclose:</i>	
13 (a)	A description of the current and anticipated effects of climate-related risks and opportunities on the entity's business model and value chain.	page 116
13 (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).	page 116



SUSTAINABILITY STATEMENT

ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
STRATEGY AND DECISION-MAKING		
14	<i>An entity shall disclose information that enables users of general-purpose financial reports to understand the effects of climate-related risks and opportunities on its strategy and decision-making. Specifically, the entity shall disclose:</i>	
14 (a)	<i>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>	
14 (a) (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).	page 116
14 (a) (ii)	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).	page 117 - 119
14 (a) (iii)	Current and anticipated indirect mitigation and adaptation efforts (for example, through working with customers and supply chains).	page 117 - 119
14 (a) (iv)	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.	page 118 - 119
14 (a) (v)	How the entity plans to achieve any climate-related targets, including any greenhouse gas emissions targets.	page 121
14 (b)	Information about how the entity is resourcing, and plans to resource, the activities disclosed.	page 116
14 (c)	Quantitative and qualitative information about the progress of plans disclosed in previous reporting periods.	page 119 - 121

SUSTAINABILITY STATEMENT

ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
FINANCIAL POSITION, FINANCIAL PERFORMANCE AND CASH FLOWS		
15	<i>An entity shall disclose information that enables users of general-purpose financial reports to understand:</i>	
15 (a)	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).	*The Group is gradually enhancing its data, methods, and systems to assess and measure the current and potential financial impacts of climate-related risks and opportunities, in line with IFRS S2. Disclosures will be introduced progressively as these methods develop.
15 (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).	
16	<i>Specifically, an entity shall disclose quantitative and qualitative information about:</i>	
16 (a)	How climate-related risks and opportunities have affected its financial position, financial performance and cash flows for the reporting period;	The Group is gradually enhancing its data, methods, and systems to assess and measure the current and potential financial impacts of climate-related risks and opportunities, in line with IFRS S2. Disclosures will be introduced progressively as these methods develop.
16 (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;	
16 (c) (i)	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 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;	
16 (c) (ii)	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 its planned sources of funding to implement its strategy; and	
16 (d)	How the entity expects its financial performance and cash flows to change over the short, medium and long term, given its strategy	



SUSTAINABILITY STATEMENT

ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
FINANCIAL POSITION, FINANCIAL PERFORMANCE AND CASH FLOWS		
21	<i>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 paragraph 19 - 20, the entity shall:</i>	
21 (a)	explain why it has not provided quantitative information;	The Group is gradually improving its data, methods, and systems to assess and measure the current and potential financial impacts of climate-related risks and opportunities, in line with IFRS S2. Disclosures will be introduced progressively as these methods develop.
21 (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	
21 (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.	
22 (a)	<i>The entity's assessment of its climate resilience as at the reporting date, which shall enable users of general-purpose financial reports to understand:</i>	
22 (a) (i)	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 is assessed qualitatively based on the outcomes of climate scenario analysis and stress testing conducted during the reporting period. The assessment considers the Group's exposure, vulnerabilities and capacity to respond under different climate scenarios.
22 (a) (ii)	The significant areas of uncertainty considered in the entity's assessment of its climate resilience.	
22 (b) (i)	<i>How and when the climate-related scenario analysis was carried out, including information about the inputs the entity used, including:</i>	The Group is gradually improving its data, methods, and systems to conduct a climate scenario analysis in the near future.
22 (b) (i) (1)	Which climate-related scenarios the entity used for the analysis and the sources of those scenarios;	
22 (b) (i) (2)	Whether the analysis included a diverse range of climate-related scenarios;	
22 (b) (i) (3)	Whether the climate-related scenarios used for the analysis are associated with climate-related transition risks or climate-related physical risks;	
22 (b) (i) (4)	Whether the entity used, among its scenarios, a climate-related scenario aligned with the latest international agreement on climate change;	
22 (b) (i) (5)	Why the entity decided that its chosen climate-related scenarios are relevant to assessing its resilience to climate-related changes, developments or uncertainties;	
22 (b) (i) (6)	The time horizons the entity used in the analysis; and	
22 (b) (i) (7)	What scope of operations the entity used in the analysis (for example, the operating locations and business units used in the analysis).	

SUSTAINABILITY STATEMENT

ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
FINANCIAL POSITION, FINANCIAL PERFORMANCE AND CASH FLOWS		
22 (b) (ii)	<i>How and when the climate-related scenario analysis was carried out, including the key assumptions the entity made in the analysis, including assumptions about:</i>	
22 (b) (ii) (1)	Climate-related policies in the jurisdictions in which the entity operates;	The Group is gradually improving its data, methods, and systems to conduct a climate scenario analysis in the near future.
22 (b) (ii) (2)	Macroeconomic trends;	
22 (b) (ii) (3)	National- or regional-level variables (for example, local weather patterns, demographics, land use, infrastructure and availability of natural resources);	
22 (b) (ii) (4)	Energy usage and mix; and	
22 (b) (ii) (5)	Developments in technology	
22 (b) (iii)	The reporting period in which the climate-related scenario analysis was carried out	
RISK MANAGEMENT		
25	<i>The processes and related policies the entity uses to identify, assess, prioritise and monitor climate-related risks, including information about:</i>	
25 (a) (i)	The inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes);	page 117
25 (a) (ii)	Whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related risks;	
25 (a) (iii)	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);	
25 (a) (iv)	Whether and how the entity prioritises climate-related risks relative to other types of risk;	
25 (a) (v)	How the entity monitors climate-related risks;	
25 (a) (vi)	explain why it has not provided quantitative information;	
25 (b)	An entity shall disclose information about 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.	page 117
25 (c)	An entity shall disclose information about 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.	page 117



SUSTAINABILITY STATEMENT

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INDICATOR	DESCRIPTION	PAGE REFERENCE
METRICS AND TARGETS		
CLIMATE-RELATED METRICS		
29 (a)	<i>An entity shall disclose information relevant to the cross-industry metric categories of greenhouse gas – the entity shall;</i>	
29 (a) (i)	Absolute gross greenhouse gas emissions generated during the reporting period, expressed as metric tonnes of CO2 equivalent, classified as: <ul style="list-style-type: none"> • Scope 1 greenhouse gas emissions. • Scope 2 greenhouse gas emissions. • Scope 3 greenhouse gas emissions. 	
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.	
29 (a) (iii)	The approach used to measure greenhouse gas emissions including: <ul style="list-style-type: none"> • The measurement approach, inputs and assumptions the entity uses to measure its greenhouse gas emissions. • The reason why the entity has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions. • Any changes the entity made to the measurement approach, inputs and assumptions during the reporting period and the reasons for those changes. 	page 119 - 120, 141 - 142
29 (a) (iv)	For Scope 1 and Scope 2 greenhouse gas emissions disclosed, disaggregate emissions between: <ul style="list-style-type: none"> • The consolidated accounting group. • Other investees excluded from paragraph 29(a)(iv)(1) (for an entity applying IFRS Accounting Standards, these investees would include associates, joint ventures and unconsolidated subsidiaries). 	
29 (a) (v)	Location-based Scope 2 greenhouse gas emissions, and the information about any contractual instruments that is necessary to inform users' understanding of the entity's Scope 2 greenhouse gas emissions.	
29 (a) (vi)	For Scope 3 greenhouse gas emissions disclosed: <ul style="list-style-type: none"> • 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). • (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. 	

ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
METRICS AND TARGETS		
CLIMATE-RELATED METRICS		
29(b)	Climate-related transition risks—the amount and percentage of assets or business activities vulnerable to climate-related transition risks.	*The Group currently assesses climate-related transition risks through qualitative risk identification, sectoral analysis and scenario-based assessments. Quantification of the amount and percentage of assets or business activities vulnerable to transition risks is under development, as methodologies, data availability and portfolio tagging continue to be enhanced. These disclosures will be phased in as assessment capabilities mature.
29(c)	Climate-related physical risks—the amount and percentage of assets or business activities vulnerable to climate-related physical risks.	*The Group currently assesses climate-related physical risks through qualitative risk identification and scenario analysis. Quantification of the amount and percentage of assets or business activities vulnerable to physical climate risks is under development, as methodologies, data availability and asset-level location information continue to be enhanced. These disclosures will be phased in as assessment capabilities mature.
29(d)	Climate-related opportunities—the amount and percentage of assets or business activities aligned with climate-related opportunities.	*The Group currently discloses qualitative information on climate-related financing activities. Quantitative disclosure of the amount and percentage of assets or business activities aligned with climate-related opportunities is under development and will be enhanced as classification methodologies and data availability mature.
29(e)	Capital deployment—the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities.	*The Group discloses qualitative information on financing activities supporting climate-related opportunities. Quantitative disclosure of capital deployment, including capital expenditure, financing and investment aligned with climate-related opportunities, is under development and will be enhanced as data classification and tracking capabilities mature.
29(f)	Internal carbon prices	*The Group does not currently apply an internal carbon price and is reviewing its approach, taking into consideration market pricing developments and the Group's sustainability objectives.



SUSTAINABILITY STATEMENT

ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
METRICS AND TARGETS		
CLIMATE-RELATED METRICS		
29 (g)	<i>An entity shall disclose information relevant to the cross-industry metric categories of remuneration prices– the entity shall;</i>	
29 (g) (i)	<ul style="list-style-type: none"> A description of whether and how climate-related considerations are factored into executive remuneration (see also paragraph 6(a)(v)). 	page 104
29 (g) (ii)	The percentage of executive management remuneration recognised in the current period that is linked to climate-related considerations.	
CLIMATE-RELATED TARGETS		
33	<i>An entity shall disclose the qualitative and quantitative 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:</i>	
33(a)	The metric used to set the target.	page 114, 119 - 120
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.	
33 (h)	How the latest international agreement on climate change, including jurisdictional commitments that arise from that agreement, has informed the target.	
34	<i>An entity shall disclose information about its approach to setting and reviewing each target, and how it monitors progress against each target:</i>	
34 (a)	Whether the target and the methodology for setting the target has been validated by a third-party.	*The Group’s climate-related targets and methodologies have not been validated by a third-party. External validation may be considered as methodologies and governance processes further mature. page 142
34 (b)	The entity’s processes for reviewing the target.	
34 (c)	The metrics used to monitor progress towards reaching the target.	
34 (d)	Any revisions to the target and an explanation for those revisions.	

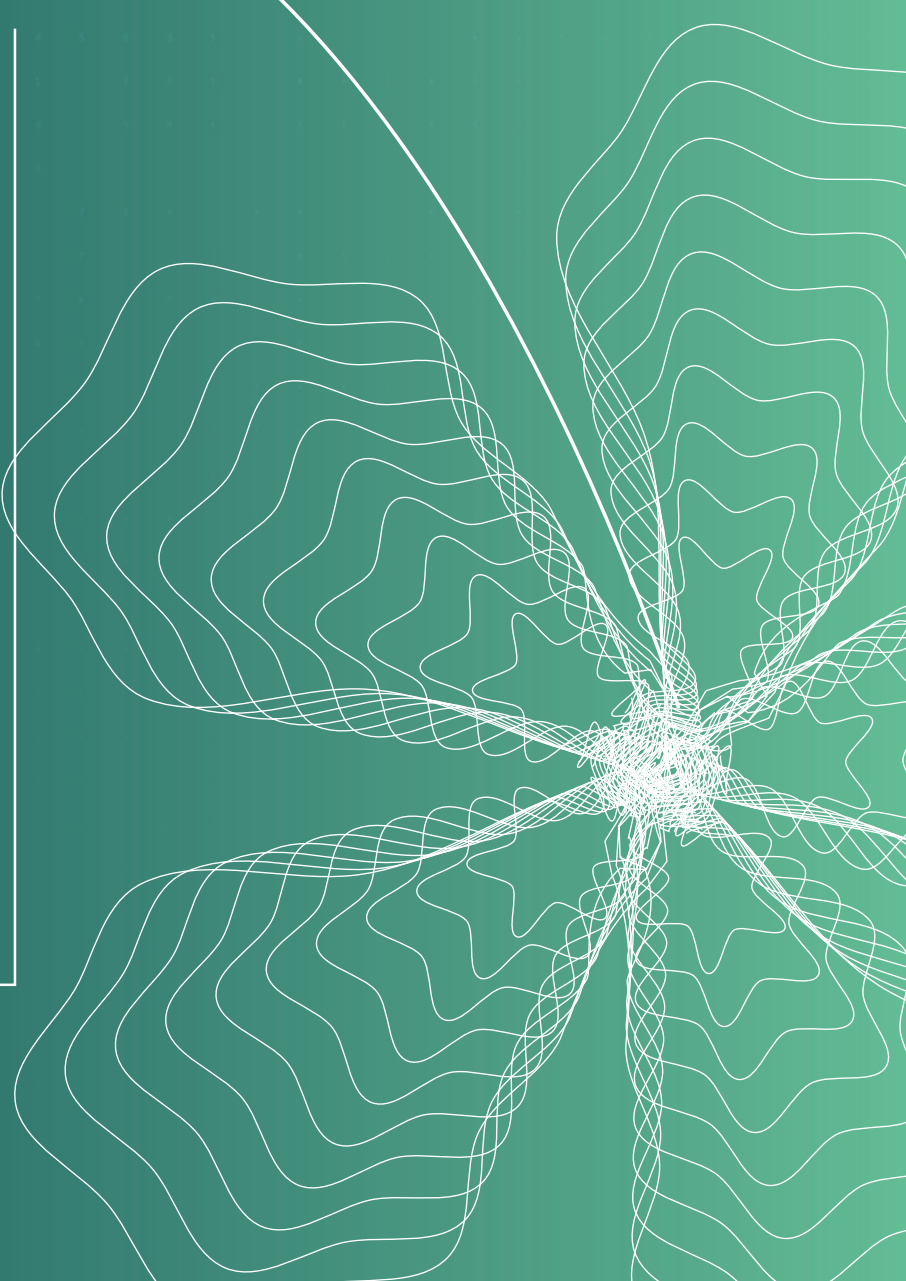
ADDITIONAL SUSTAINABILITY INFORMATION

INDICATOR	DESCRIPTION	PAGE REFERENCE
METRICS AND TARGETS		
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.	page 119 - 120
36 (a)	Which greenhouse gases are covered by the target.	page 119
36 (b)	Whether Scope 1, Scope 2 or Scope 3 greenhouse gas emissions are covered by the target.	page 119 - 120
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.	page 119, 141 - 142
36 (d)	Whether the target was derived using a sectoral decarbonisation approach.	The Group will provide further details on the approach used in targets set in the next reporting cycle.
36 (e)	<i>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:</i>	
36 (e) (i)	The extent to which, and how, achieving any net greenhouse gas emissions target relies on the use of carbon credits.	The Group will provide further details on the plans to use carbon credits in the near future.
36 (e) (ii)	which third-party scheme(s) will verify or certify the carbon credits;	
36 (e) (iii)	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.	
36 (e) (iv)	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)	

SECTION 7

CORPORATE GOVERNANCE

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CORPORATE GOVERNANCE

CORPORATE INFORMATION

BOARD OF DIRECTORS

Dato' Noorazman Bin Abd Aziz
Independent Non-Executive Chairman

Lynette Yeow Su-Yin
Independent Non-Executive Director

Su Puay Leng
Independent Non-Executive Director

Nirmala A/P Doraisamy
Independent Non-Executive Director

Ankur Sehgal
Executive Director
(Appointed on 31 March 2026)

Mizran Bin Md Nahar
Non-Independent Non-Executive Director
(Appointed on 31 March 2026)

AUDIT COMMITTEE

Nirmala A/P Doraisamy
Chairperson

Su Puay Leng
Member

Lynette Yeow Su-Yin
Member

RISK & COMPLIANCE COMMITTEE

Su Puay Leng
Chairperson

Mizran Bin Md Nahar
Member

Nirmala A/P Doraisamy
Member

NOMINATION & REMUNERATION COMMITTEE

Lynette Yeow Su-Yin
Chairperson

Mizran Bin Md Nahar
Member

Nirmala A/P Doraisamy
Member

BOARD INVESTMENT COMMITTEE

Su Puay Leng
Chairperson

Mizran Bin Md Nahar
Member

Dato' Noorazman Bin Abd Aziz
Member

EMPLOYEE SHARE OPTION SCHEME COMMITTEE

Lynette Yeow Su-Yin
Chairperson

Nirmala A/P Doraisamy
Member

Mizran Bin Md Nahar
Member

Ankur Sehgal
Member

COMPANY SECRETARIES

NG CHEONG SENG
(SSM PC No. 202408000584)
(MIA17444)

KOOI EE LIN
(SSM PC No. 201908001822)
(MAICSA7066158)

AUDITORS

PricewaterhouseCoopers PLT

Level 10, Menara TH 1 Sentral,
Jalan Rakyat, Kuala Lumpur Sentral,
50706 Kuala Lumpur, Wilayah
Persekutuan Kuala Lumpur

Tel. No.: +603 2173 1188

Partner-in-charge: Chan Suet Lye

Professional qualification:

Member of MIA

(MIA membership No.: CA46421)

REGISTERED OFFICE

Level 5, Guoco Tower,
6 Jalan Damanela, Damansara City,
Bukit Damansara, 50490

Kuala Lumpur W.P. Kuala Lumpur

Tel. No.: +603 7890 2833

E-mail: mysecretaryteam@incorp.asia

CORPORATE OFFICE

Level 17, Menara CelcomDigi,
No. 6, Persiaran Barat, Seksyen 52,
46200 Petaling Jaya, Selangor

Tel. No.: +603 2722 8888

Website: www.ctosdigital.com

E-mail: info@ctosdigital.com

SHARE REGISTRAR

Tricor Investor & Issuing House Services Sdn Bhd

Unit 32-01, Level 32, Tower A,
Vertical Business Suite, Avenue 3,
Bangsar South, No. 8, Jalan Kerinchi,
59200 Kuala Lumpur

Tel. No.: +603 2783 9299

E-mail: is.enquiry@vistra.com

STOCK EXCHANGE LISTING

Main Market of Bursa Malaysia
Securities Berhad (5301)



CORPORATE GOVERNANCE

BOARD OF DIRECTORS' PROFILE

DATO' NOORAZMAN BIN ABD AZIZ

Independent
Non-Executive Chairman



Board Meeting
Attendance:

**DATE OF APPOINTMENT**

24 February 2020

BOARD COMMITTEE MEMBERSHIP

- BIC (Member)

ACADEMIC/QUALIFICATIONS/MEMBERSHIP(S)

- Bachelor of Science in Finance (Louisiana State University, USA)
- Citicorp Associate Programme Training Institute, New York, USA
- Member of the Chartered Institute of Islamic Finance Professionals ("CIIF")
- Member of the Australian Institute of Company Directors
- Member of the Institute of Corporate Directors Malaysia

RELEVANT WORKING EXPERIENCE

Over 40 years of experience in banking and finance, investments, and capital markets.

- Executive Director, Investments at Khazanah Nasional Berhad
- Co-founder and Managing Director, Fajr Capital Ltd
- Managing Director and Chief Executive Officer, BIMB Holdings Berhad
- Managing Director and Chief Executive Officer, Bank Islam Malaysia Berhad
- Managing Director and Head of Corporate and Investment Banking, Citibank Berhad
- Chief Operating Officer, Bursa Securities (Kuala Lumpur Stock Exchange Berhad)
- Director General, Labuan Financial Services Authority
- Senior Vice President (Corporate Banking and Treasury), Citibank Berhad

PRESENT DIRECTORSHIP(S) IN OTHER PUBLIC OR LISTED COMPANIES:

- Independent Non-Executive Director of Kumpulan Perangsang Selangor Berhad
- Chairman of Sun Life Malaysia Assurance Berhad
- Chairman of Sun Life Malaysia Takaful Berhad
- Chairman of MUFG Bank (Malaysia) Berhad
- Chairman of the Board of Trustees of Yayasan UEM
- Chairman of the Board of Trustee of International Centre for Education in Islamic Finance ("INCEIF")
- Member of the Audit Oversight Board of the Securities Commission
- Member of the Investment Panel of Kumpulan Wang Persaraan ("KWAP")
- Board of Trustees of OSK Foundation

OTHER APPOINTMENTS

- Advisor, Vynn Capital Sdn Bhd

He has no family relationship with any of the other Directors and/or major shareholders of the Company. He has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). He has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on him by any relevant regulatory bodies during the financial year.

CORPORATE GOVERNANCE

BOARD OF DIRECTORS' PROFILE

LYNETTE YEOW SU-YIN



Independent
Non-Executive Director



DATE OF APPOINTMENT

1 October 2020

BOARD COMMITTEE MEMBERSHIP

- NRC (Chairperson), ESOSC (Chairperson) and AC (Member)

ACADEMIC/QUALIFICATIONS/MEMBERSHIP(S)

- Bachelor of Arts in Law (University of Cambridge, United Kingdom)
- Master of Arts in Law (University of Cambridge, United Kingdom)
- Advocate and Solicitor of the High Court of Malaya
- Member of the Malaysian Bar

RELEVANT WORKING EXPERIENCE

A lawyer by profession with over 28 years of experience specialising in corporate and securities laws, mergers and acquisitions and capital markets.

- Consultant, Messrs Christopher & Lee Ong
- Consultant, Messrs Sanjay Mohan
- Consultant, Messrs Chua Associates
- Partner, Messrs Chua Associates
- Partner, Kadir Andri & Partner
- Partner, Messrs Zaid Ibrahim & Co
- Partner, Messrs Raslan Loong

PRESENT DIRECTORSHIP(S) IN OTHER PUBLIC OR LISTED COMPANIES:

- Independent Non-Executive Director of Orkim Berhad

OTHER APPOINTMENTS

- Independent Non-Executive Director of TNB Power Generation Sdn Bhd
- Trustee of Amanah Warisan Negara (AWAN)

She has no family relationship with any of the other Directors and/or major shareholders of the Company. She has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the group other than as disclosed to the Board of Directors (if any). She has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on her by any relevant regulatory bodies during the financial year.

NIRMALA A/P DORAISAMY



Independent
Non-Executive Director



DATE OF APPOINTMENT

1 April 2021

BOARD COMMITTEE MEMBERSHIP

- AC (Chairperson), RCC (Member), NRC (Member) and ESOSC (Member)

ACADEMIC/QUALIFICATIONS/MEMBERSHIP(S)

- Bachelor of Economics (Hons) (University Malaya, Malaysia)
- MBA (International Islamic University Malaysia, Malaysia)
- Member of Malaysian Institute of Accountants ("MIA")
- Chartered Global Management Accountant, UK
- Fellow of Chartered Institute of Management Accountants, UK

RELEVANT WORKING EXPERIENCE

Over 35 years of experience specialising in banking and finance, risk management and advisory work.

- Senior Independent Director, Evergreen Fibreboard Bhd, Chairman of Risk & Sustainability Committee, Chairman of Nomination Committee, Member of Audit Committee and Remuneration Committee
- Director of Ecobuilt Holdings Bhd (Ecobuilt), Chairman of Nomination Committee and Member of Audit Committee, Ecobuilt
- Director of Credence Malaysia Sdn Bhd
- Head of Risk Management, Credit Guarantee Corporation Malaysia Berhad
- Various positions in Affin Bank Bhd, Alliance Bank, Malaysia Bhd and MBF Finance Bhd

PRESENT DIRECTORSHIP(S) IN OTHER PUBLIC OR LISTED COMPANIES:

- Independent Non-Executive Director of Petronas Dagangan Berhad
- Independent Non-Executive Director of Aeon Bank (M) Bhd

OTHER APPOINTMENTS

- Member of Auditing and Assurance Standards Board, Malaysia Institute of Accountants

She has no family relationship with any of the other Directors and/or major shareholders of the Company. She has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group other than as disclosed to the Board of Directors (if any). She has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on her by any relevant regulatory bodies during the financial year.

CORPORATE GOVERNANCE

BOARD OF DIRECTORS' PROFILE

SU PUAY LENG56 F Independent
Non-Executive Director**DATE OF APPOINTMENT**

27 May 2021

BOARD COMMITTEE MEMBERSHIP

- BIC (Chairman), RCC (Chairman), and AC (Member)

ACADEMIC/QUALIFICATIONS/MEMBERSHIP(S)

- First class honours in Bachelor of Laws (International Islamic University, Malaysia)
- MBA (University of Cambridge, United Kingdom)
- Advocate and Solicitor of the High Court of Malaya
- Member of the Institute of Corporate Directors Malaysia (ICDM)
- Member of the Malaysian Bar

RELEVANT WORKING EXPERIENCE

Over 30 years in the legal profession with experience in compliance, data privacy, cybersecurity and technology disputes.

- Counsel, Messrs Christopher & Lee Ong
- Head of Legal, Maxis Berhad group
- Counsel, Messrs Skrine

PRESENT DIRECTORSHIP(S) IN OTHER PUBLIC OR LISTED COMPANIES:

- Nil

OTHER APPOINTMENTS

- Nil

She has no family relationship with any of the other Directors and/or major shareholders of the Company. She has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group other than as disclosed to the Board of Directors (if any). She has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on her by any relevant regulatory bodies during the financial year.

MIZRAN BIN MD NAHAR33 M Non-Independent Non-Executive
Director**DATE OF APPOINTMENT**

31 March 2026

BOARD COMMITTEE MEMBERSHIP

- BIC (Member), RCC (Member), NRC (Member) and ESOSC (Member)

ACADEMIC/QUALIFICATIONS/MEMBERSHIP(S)

- First class honours in Bachelor of Commerce – Accounting & Finance (University of Melbourne)

RELEVANT WORKING EXPERIENCE

Over 10 years working experience in equity capital markets, mergers and acquisitions and general investment across Southeast Asia

- Director, Investment of Creador Sdn Bhd
- Assistant Vice President of Khazanah Nasional Berhad
- Assistant Manager at Maybank Investment Bank

PRESENT DIRECTORSHIP(S) IN OTHER PUBLIC OR LISTED COMPANIES:

- Nil

OTHER APPOINTMENTS

- Nil

He has no family relationship with any of the other Directors and/or major shareholders of the Company. Save for the Recurrent Related Party Transactions disclosed to the Board of Directors and as set out under the Statement Accompanying Notice of Annual General Meeting, he has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group. He has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on him by any relevant regulatory bodies during the financial year.

CORPORATE GOVERNANCE
BOARD OF DIRECTORS' PROFILE

ANKUR SEHGAL

Executive Director
Group Chief Executive Officer



Board Meeting
Attendance 2025:

**DATE OF APPOINTMENT**

31 March 2026

BOARD COMMITTEE MEMBERSHIP

- ESOSC (Member)

ACADEMIC/QUALIFICATIONS/MEMBERSHIP(S)

- Bachelor of Technology in Metallurgical and Materials Engineering (Indian Institute of Technology (IIT) Roorkee, India)

RELEVANT WORKING EXPERIENCE

20 years of leadership experience in digital banking, product and strategy, retail credit, risk management, data and analytics. His career spans across Singapore, Malaysia, Philippines, Vietnam, Cambodia, and the United States, with a strong record of building digital businesses, scaling fast-growing financial institutions, establishing risk management frameworks and strengthening the credit ecosystems across the region.

Prior to CIMB, Ankur held senior leadership roles at AmBank Group Malaysia, OCBC Bank Singapore, United Overseas Bank Singapore and JP Morgan Chase. Across these roles, he led large teams across risk management, credit, collections, fraud operations, data and analytics, IFRS9, credit scorecards and portfolio management, including delivering one of Malaysia's largest retail debt-sale transactions, implementing credit infrastructure and enhancing risk-based strategies and frameworks that delivered strong risk adjusted returns across the region.

- Senior Managing Director, Digital Business at CIMB Bank Malaysia
- Board of Director of CIMB Bank Cambodia
- Chief Business & Strategy Officer at CIMB Bank Philippines
- Group Head of Retail Credit Management & Operations at Ambank Group in Malaysia

PRESENT DIRECTORSHIP(S) IN OTHER PUBLIC OR LISTED COMPANIES:

- Nil

OTHER APPOINTMENTS

- Nil

He has no family relationship with any of the other Directors and/or major shareholders of the Company. He has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). He has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on him by any relevant regulatory bodies during the financial year.

CORPORATE GOVERNANCE

KEY SENIOR MANAGEMENT'S PROFILE

ANKUR SEHGAL

Group Chief Executive Officer

Age:

43

Gender:

MALE

Nationality

INDIAN

Join Date:

16 JANUARY 2026

DATE OF APPOINTMENT OF CURRENT POSITION

16 JANUARY 2026

ACADEMIC/QUALIFICATION(S)

- Bachelor of Technology in Metallurgical and Materials Engineering (Indian Institute of Technology (IIT) Roorkee, India)

RELEVANT WORKING EXPERIENCE

Ankur Sehgal is the Group Chief Executive Officer of CTOS Digital Berhad, effective 16 January 2026. He leads the Group's strategic direction, growth agenda, and transformation journey, with a focus on strengthening CTOS' role as a trusted data and analytics partner to businesses, financial institutions, and consumers.

He brings with him 20 years of leadership experience in digital banking, product and strategy, retail credit, risk management, data and analytics. His career spans across Singapore, Malaysia, Philippines, Vietnam, Cambodia, and the United States, with a strong record of building digital businesses, scaling fast-growing financial institutions, establishing risk management frameworks and strengthening the credit ecosystems across the region.

He does not hold any directorships in public companies or listed corporations. He has no interest in the shares of the Company or its subsidiaries. He has no family relationship with any of the other Directors and/or major shareholders of the Company. He has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). He has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on him by any relevant regulatory bodies during the financial year.

TAN MING YEW

Group Chief Financial Officer

Age:

43

Gender:

MALE

Nationality

MALAYSIAN

Join Date:

13 OCTOBER 2025

DATE OF APPOINTMENT OF CURRENT POSITION

13 OCTOBER 2025

ACADEMIC/QUALIFICATION(S)

- Master of Business Administration (MBA), University of Strathclyde
- Chartered Financial Analyst (CFA)
- Association of Chartered Certified Accountants (ACCA)

RELEVANT WORKING EXPERIENCE

Ming Yew brings over 20 years of experience in financial and commercial advisory, change management and process enhancement across the banking, financial services, and FMCG sectors. He has led financial transformation, automation, and digitalisation initiatives, alongside cost optimisation and revenue enhancement efforts.

Prior to joining CTOS, he served as Managing Director, Finance and Operations at Bank Pembangunan Malaysia Berhad, overseeing Finance, Procurement, Recovery, IT, Transformation Office, Credit Administration and Property Management Services, and played a key role in a bank merger integration and major transformation and systems turnaround initiatives.

He previously held senior leadership roles at PayNet, including Acting Chief Operating Officer and Finance, Administration and Procurement Director, leading finance transformation and process re-engineering initiatives. Earlier, he spent close to nine years at AmBank Group in senior finance roles, including Group Financial Controller and CFO, Retail Banking, driving performance turnaround, cost optimisation and automation. He began his career with British American Tobacco Malaysia Berhad in various finance and audit roles across ASEAN.

He does not hold any directorships in public companies or listed corporations. He has no family relationship with any of the other Directors and/or major shareholders of the Company. He has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). He has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on him by any relevant regulatory bodies during the financial year.

CORPORATE GOVERNANCE

KEY SENIOR MANAGEMENT'S PROFILE

SIVANATHAN SUBRAMANIAM

Group Chief Risk
& Compliance Officer

Age:

45

Gender:

MALE

Nationality

MALAYSIAN

Join Date:

17 SEPTEMBER 2025

DATE OF APPOINTMENT OF CURRENT POSITION

17 SEPTEMBER 2025

ACADEMIC/QUALIFICATION(S)

- Master's Degree in Computer Science (Information Security), Universiti Teknologi Malaysia
- Bachelor of Engineering (Electronics – Telecommunications), Multimedia University

RELEVANT WORKING EXPERIENCE

Sivanathan brings more than 23 years of experience in technology, cyber security, risk management and regulatory oversight, with deep expertise across financial services, public sector and enterprise environments.

Prior to his appointment as Group Chief Risk & Compliance Officer, he served as General Manager, Cyber Security & Resilience at CTOS Data Systems Sdn Bhd and led the development and implementation of the Group's cyber security, technology risk and resilience frameworks. Before joining CTOS, Sivanathan was Deputy Director at Bank Negara Malaysia, heading the Cyber Security Risk Specialist Unit, where he played a key role in policy development, industry supervision and strengthening cyber and operational resilience across the Malaysian financial sector. He also held senior cyber security leadership roles at Standard Chartered Bank Malaysia and founded a regional cyber security consultancy serving clients across ASEAN.

He does not hold any directorships in public companies or listed corporations. He has no family relationship with any of the other Directors and/or major shareholders of the Company. He has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). He has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on him by any relevant regulatory bodies during the financial year.

PREMILA SIVAM

Group Chief
People Officer

Age:

54

Gender:

FEMALE

Nationality

MALAYSIAN

Join Date:

17 FEBRUARY 2025

DATE OF APPOINTMENT OF CURRENT POSITION

17 FEBRUARY 2025

ACADEMIC/QUALIFICATIONS(S)

- Master of Arts (Political & Social Sciences), University of Leeds, United Kingdom
- Chartered Fellow (Chartered FCIPD), Chartered Institute of Personnel Development, United Kingdom
- Certified KPI Professional (CKPIP), KPI Institute, Australia
- Bachelor of Business in Business Administration (Marketing Major), RMIT University, Australia

RELEVANT WORKING EXPERIENCE

Premila brings over 25 years of human resources leadership experience across multinational and national organisations in Asia Pacific. Her expertise spans the full spectrum of people functions across employer branding, organisation design, talent management, performance and rewards architecture, digital HR transformation, culture development and sustainability. Prior to CTOS, she was Director and Consultant at Gerson Lehrman Group, Singapore. She also served as Senior Vice President & Head of People Strategy at Pos Malaysia, leading workforce transformation, union engagements and HR model redesign. Earlier roles include senior leadership positions at Techcombank (Vietnam), AECOM (Singapore), HSBC (Malaysia), and DHL Express Asia Pacific.

She does not hold any directorships in public companies or listed corporations. She has no family relationship with any of the other Directors and/or major shareholders of the Company. She has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). She has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on her by any relevant regulatory bodies during the financial year.



CORPORATE GOVERNANCE

KEY SENIOR MANAGEMENT'S PROFILE

LEE SHIN MEI

Chief Executive Officer
of CTOS Data Systems
Sdn Bhd

Age:**50****Gender:****FEMALE****Nationality****MALAYSIAN****Join Date:****1 NOVEMBER 2023****DATE OF APPOINTMENT OF CURRENT POSITION**

3 FEBRUARY 2026

ACADEMIC/QUALIFICATIONS/MEMBERSHIP(S)

- First Class Hons Degree Business Management, Universiti Sains Malaysia, Pulau Pinang

RELEVANT WORKING EXPERIENCE

Shin Mei brings more than 26 years of experience in enterprise business and with exceptional track-record in driving business growth. Before joining CTOS, she was the Head of Enterprise Business with Google Cloud Malaysia where she achieved exceptional year-on-year growth and played a pivotal role in building the company's presence.

Prior to that, she was the Head of Enterprise Business at Digi Telecommunications. Shin Mei also worked at Microsoft as a Senior Channel Sales Director and Sales Director, overseeing the Microsoft Malaysia Corporate Account business. Shin Mei began her professional journey at Samsung Malaysia Electronics, where she held positions as Senior Manager and Marketing Manager, handling the IT business and managing a team.

Shin Mei also worked at HP as a Channel Programme Manager. Overall, Shin Mei Lee has a strong background in business development, sales, and management, with expertise in cloud platforms, telecommunications and technology.

She does not hold any directorships in public companies or listed corporations. She has no family relationship with any of the other Directors and/or major shareholders of the Company. She has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). She has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on her by any relevant regulatory bodies during the financial year.

BENJAMIN LAU CHI MENG

Chief Technology Officer
of CTOS Data Systems
Sdn Bhd

Age:**43****Gender:****MALE****Nationality****MALAYSIAN****Join Date:****23 JUNE 2025****DATE OF APPOINTMENT OF CURRENT POSITION**

23 JUNE 2025

ACADEMIC/QUALIFICATION(S)

- Bachelor's Degree in Computer Science, Monash University Malaysia.

RELEVANT WORKING EXPERIENCE

Benjamin brings more than 15 years of experience in information technology, infrastructure, cloud transformation and cybersecurity, with a strong track record in aligning technology strategies with business objectives.

Before his appointment as Chief Technology Officer of CTOS Data Systems Sdn Bhd, he held various senior leadership roles within the CTOS Group, including General Manager (Infrastructure, Support & Cloud), Group General Manager (IT) at CTOS Digital Berhad, and General Manager of IT at CTOS Data Systems Sdn Bhd.

Throughout his career, Benjamin has led large-scale IT operations, data centre and infrastructure transformation, cloud adoption initiatives and software development teams. He has extensive experience in building secure, scalable and resilient technology platforms to support business growth, product innovation and regional expansion.

He does not hold any directorships in public companies or listed corporations. He has no family relationship with any of the other Directors and/or major shareholders of the Company. He has no conflict of interest including any potential conflict of interest may arise with the Group and interest in any business that is in competition with the Group, other than as disclosed to the Board of Directors (if any). He has not been convicted of any offences (other than traffic offences) within the past 5 years, and no public sanctions or penalty have been imposed on him by any relevant regulatory bodies during the financial year.

CORPORATE GOVERNANCE

CORPORATE GOVERNANCE OVERVIEW STATEMENT

CTOS Digital Berhad (the “CTOS” or “Company”) and its subsidiaries (collectively referred to as the “Group”) are committed to upholding high standards of corporate governance (“CG”). The Group believes that good governance practices are critical to enhance shareholders’ value, business integrity and performance, and set as the fundamental principles to achieve the Group’s mission, vision and corporate objectives.

The Board of Directors (“Board”), Management, and employees are constantly working to improve the Company’s CG practices and processes and strive to uphold the CG principles. The Board is pleased to present this CG Overview Statement for the financial year ended 31 December 2025 (“FYE 2025”) based on the following statutory provisions: (i) Companies Act 2016; (ii) Malaysian Code on Corporate Governance 2021 (“MCCG 2021”); (iii) Main Market Listing Requirements (“MMLR”) of Bursa Malaysia Securities Berhad (“Bursa Malaysia”); (iv) Corporate Governance Guide (4th Edition) issued by the Bursa Malaysia Berhad and (v) International Financial Reporting Standards (IFRS) Sustainability Disclosure Standards (IFRS S1 & S2)

The CG Overview Statement shall be read together with the CG Report 2025 (“CG Report”), available on the Company’s website at www.ctosdigital.com. The comprehensive details of the Company’s overall approach and specific practices in relation to CG, including how the Company has applied each of the practices set out in the MCCG 2021 are disclosed in the CG Report.



PRINCIPLE A – BOARD LEADERSHIP AND EFFECTIVENESS

I. BOARD RESPONSIBILITIES

(A) Board of Directors

The Board is primarily responsible for the effective governance and management of the Group and also responsible for the Group’s financial and organisational health. Ultimately, the Board is collectively responsible to ensure that sustainable value is delivered to its stakeholders. Each Director has a legal duty to act in the best interest of the Group and the Directors collectively and individually are aware of their responsibilities to the stakeholders for the manner in which the affairs of the Group are managed. The roles and responsibilities of the Directors are set out in the Board Charter which is published on the Company’s website at <https://ctosdigital.com/corporate-governance/>.

In discharging its stewardship role effectively, the Board has mandated and delegated its authority and specific duties and responsibilities to the Board Committees in carrying out the Board’s oversight functions, each of which is explained further in details under sub-paragraph (E) Board Committees of this CG Overview Statement.





CORPORATE GOVERNANCE

CORPORATE GOVERNANCE OVERVIEW STATEMENT

All the Board Committees are actively engaged and act as oversight committees. The Board Committees discuss and decide on matters within their decision mandates or where required, make the recommendation to the Board for approval. The Board further receives updates from the respective Chairman of the Board Committees on matters that have been discussed and deliberated at the respective Board Committee meetings.

The Board communicates its decisions to Management through the Group Chief Executive Officer (“GCEO”), who oversees the implementation within the business operation. Management is responsible for the day-to-day management of the Group pursuant to the powers delegated by the Board, subject to compliance with the applicable laws and regulations and commercial best practices.

(B) Chairman and the GCEO

In maintaining the effective supervision and accountability of the Board and the Management, the position of Chairman and GCEO are held by different individuals, thereby ensuring check and balance of power and authority. The segregation of roles assists in the furtherance of a healthy and open exchange of views between the Board and the Management particularly, in their deliberation of the business, strategic initiatives and key activities of the Group.

The Chairman of the Company, Dato’ Noorazman Bin Abd Aziz is an Independent Non-Executive Chairman. The Chairman is primarily responsible for the stewardship and smooth functioning of the Board and plays a leading role in the establishment of effective CG system and practices within the Board and the Group. The Chairman sets the tone of the Board Meetings by encouraging the active participation by the members of the Board (“Board Members”) and creating a conducive environment for dissenting views to be expressed freely to ensure that discussions and contributions from all Board Members are forthcoming on matters being deliberated, thus eliminating domination in the discussion.

In FY2025, our then GCEO Erick Hamburger stepped down on 1 May 2025, and in the interim whilst looking for a new GCEO, our then Director Loh Kok Leong, stepped into the role as the interim GCEO until Ankur Sehgal took office on 16 January 2026.

The GCEO is primarily responsible for the execution of business plans in line with the Board’s direction and drives the business and performance towards achieving the Group’s vision and goals. He is responsible for the day-to-day management and operation of the Group, implementing Board policies and strategies as well as making operational decisions within the authorities as delegated by the Board. He also plays an important role by acting as the medium between the Board and Management in ensuring the success of the Group’s governance and management functions.

(C) Board Meeting and Access to Information and Advice

The Board is required to meet quarterly, with additional meetings being convened as and when necessary to consider urgent proposals or matters that require Board’s consideration. An annual meeting calendar will be prepared and circulated to Board Members before the beginning of each year, to assist the Board Members in planning their meeting calendars and schedules. The Board also adopts Directors’ Written Resolutions as part of its decision-making process.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

The Board held thirteen (13) Board Meetings during the FYE 2025 as shown below:-

Directors / Designation	Total Number of Board Meetings Attended during FYE 2025
Dato' Noorazman Bin Abd Aziz (Independent Non-Executive Chairman)	12/13
Loh Kok Leong (Non-Independent Non-Executive Director) (Resigned on 31 March 2026) Alternate Director Mizran Bin Md Nahar	13/13
Note : On 1 May 2025, upon his appointment as Interim GCEO, Loh Kok Leong was redesignated as Executive Director. He held this title until 1 February 2026 when he assumed the Non-Independent and Non Executive Director role.	
Erick Hamburger Barraza (Executive Director/ GCEO) (Resigned on 1 May 2025)	3/3
Lynette Yeow Su-Yin (Independent Non-Executive Director)	12/13
Nirmala A/P Doraisamy (Independent Non-Executive Director)	13/13
Su Puay Leng (Independent Non-Executive Director)	13/13

Note: On 31 March 2026, Ankur Sehgal was appointed as Executive Director and Mizran Bin Md Nahar was appointed as Non-Independent Non-Executive Director. Mizran also ceased as the Alternate Director to Loh Kok Leong on the same date.

The Board recognises the importance of timely dissemination of Board's and Board Committee's papers as well as minutes of meeting to all Board Members within a reasonable period prior to the Board and Board Committee meetings. This practice greatly enables the Board Members to receive timely information, facilitate the assessment, discussion and decision making of the matters tabled before the Board meets. Upon the conclusion of the meeting, the minutes will be circulated to the Board Members for their review and comments, within a reasonable timeframe prior to the Chairman's confirmation at the following Board meeting. In ensuring the effective functioning of the Board, the Board Members have direct unrestricted access to the advice and support services of the Company Secretaries, Internal Auditors, External Auditors and Independent Advisers. They may also, if deemed necessary seek advice from the Management on issues under their respective purview.



CORPORATE GOVERNANCE

CORPORATE GOVERNANCE OVERVIEW STATEMENT

(D) Board Charter, Codes and Policies

The Board has the following in place:-

Board Charter

The Board Charter of the Company establishes the key values, principles and ethos of the Company, serving as a policy in delineating the roles and responsibilities of the Board, the Chairman, the GCEO, the Independent Directors, the Board Committees and individual Directors. The Board Charter set matters, which falls solely under the decision of the Board. It provides structured guidance for the operation of the Board in discharging its roles, and responsibilities. The Board Charter further outlines standards, expectations, and best practices for the Directors and the Management in discharging their duties towards the Company. The Board will review the Board Charter once in every two (2) years or as and when is deemed necessary to ensure that they remain consistent and relevant with the Board's objectives, operating environment, current law and best practices.

Code of Business Conduct and Ethics ("Code")

In its effort to earn the confidence, respect, and trust of the public, shareholders and stakeholders, the Company established a Code to set out the minimum standards expected from all employees. This Code ensured employees' continued compliance with ethical behaviour in all areas and situations where public trust and confidence may be compromised, or laws which may be violated. The policies enumerated in the Code serve as the expected standard of business ethics and conduct for the employees which include guidance on overseeing and managing conflict of interest, standards of business ethics and proper conduct by the Group's employees in discharging the respective roles and duties throughout daily business operation and activities.

Whistleblowing Policy ("WB Policy")

CTOS has established a WB Policy which embodied the Group's commitment to promote and maintain high standards of transparency, accountability, ethics and integrity at the workplace. This WB Policy provides a safe avenue for employees, members of the public and any third party with a business relationship with the Group, to report any improper conduct or wrongdoings that contravene the Group's values, duties and ethical responsibilities in carrying out business and corporate activities, while at the same time providing protection for employees and members of the public who report such matters. Confidentiality protection for whistleblowers is accorded to employees and members of the public, with employees being given the additional protection against potential detrimental action or retaliatory actions in the workplace.

Anti-Bribery and Corruption Policy ("ABC Policy")

CTOS has an established ABC Policy which sets forth the Group's overall position against bribery and corruption in all its forms and the Group's objective in ensuring full compliance with all applicable anti-corruption regulatory requirements when conducting its business and operation.

The ABC Policy further seeks to ensure that the Group adheres to the principles of good CG and emphasises on operating its business with fairness and transparency.

The Group does not tolerate any form of bribery and corruption. Employees are prohibited from participating in acts of corruption in the day-to-day operations of business.

This policy is applicable to the Group, business associates, resellers, agents and distributors acting on the Group's behalf, the Board and all the Group's personnel.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

Directors' Remuneration Policy

To ensure a well-structured Directors' remuneration which is aligned with the strategic objectives of the Group and the promotion of business stability and growth, the Group has established a Directors' Remuneration Policy. This Policy aims to attract, retain and reward the right talent in the Board for the success of the Group's long-term objectives while at the same time fosters shareholders' returns, strengthen the corporate governance and increase the public confidence in business.

Directors' Qualification, Fit and Proper Policy

CTOS has a Directors' Qualification, Fit and Proper Policy which sets out the standards and expectations on the suitability of all candidates and the current Directors of CTOS. The policy provides transparency on the selection of the Board composition to ensure that the Directors of CTOS meet the qualification, fit and proper and have the character, integrity and competence required to perform the roles and responsibilities as a Director of a public listed company.

The Board believes the aforesaid policies define the Group's commitment towards issues relevant to good corporate governance and are periodically reviewed to ensure relevance and applicability. They are all accessible on the Company's website at <https://ctosdigital.com/corporate-governance/>.

(E) Board Committees

The Board Committees carry out the Board's mandates by examining specific issues within the respective approved Terms of Reference ("TOR"). The Board Committees carry out their respective decision mandates as allocated by the Board and, where applicable, report to the Board with their recommendations for matters falling under the Board's purview. The TOR of the Board Committees are available for reference on the Company's website at <https://ctosdigital.com/corporate-governance/>.

The Audit Committee ("AC")

The AC assists the Board in carrying out its statutory and fiduciary responsibilities related to the Group's monitoring and management of financial risk processes, as well as its accounting practices, system of internal controls, and the Group's management and financial reporting practices, and the integration of sustainability and Environmental, Social and Governance ("ESG") into the Company's financial reporting and audit process. To accomplish this, the AC oversees the reports of external and internal auditors, upholds the integrity of financial reporting and ensures a sound system of risk management and internal controls to protect and enhance the Company's value.

The AC focuses on financial reporting, internal controls, and the integrity of financial statements. It ensures the independence and objectivity of the external auditor.

A full AC report is set out on pages 198 to 201 of this Integrated Annual Report.

The Risk and Compliance Committee ("RCC")

The RCC is responsible for providing independent oversight of the organisation's risk management and compliance frameworks by ensuring that key risks are properly identified, assessed, monitored, and managed, and that internal controls and compliance processes remain effective and aligned with applicable laws, regulatory expectations, and industry standards. The Committee reviews the organisation's risk appetite, evaluates major incidents and compliance breaches, monitors emerging risks, and ensures that ethical conduct, governance practices, and regulatory obligations are upheld. Through its oversight, the Committee supports informed decision making, promotes accountability, and safeguards the organisation's integrity, resilience, and long term sustainability.



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CORPORATE GOVERNANCE OVERVIEW STATEMENT

The Board retains ultimate responsibility for determining the Group's "risk tolerance" and annually considers a report in relation to the monitoring, controlling and reporting of identified risks and uncertainties of the Group.

A full RCC report is set out on pages 202 to 206 of this Integrated Annual Report.

The Nomination and Remuneration Committee ("NRC")

The NRC is responsible for overseeing the nomination and selection of Board Members, GCEO and GCFO, assessment framework for the Senior Management, assessing and monitoring the Board's composition and effectiveness, undertaking development needs and succession planning initiatives, recommending and reviewing policies and the remuneration structure/ framework for the Board and the Senior Management.

The NRC comprises entirely Non-Executive Directors, majority of whom are independent. The NRC is chaired by an Independent Director which is line with Practice 5.8 of MCCG 2021.

During FYE 2025, there were eleven (11) meetings held. The details of members of the NRC and the attendance record of meetings are as follows:-

NRC Members	Designation	Total Number of NRC Meetings Attended during FYE 2025
Lynette Yeow Su-Yin (Independent Non-Executive Director)	Chairperson	11/11
Nirmala A/P Doraisamy (Independent Non-Executive Director)	Member	11/11
Loh Kok Leong (Non-Independent Non-Executive Director) (Resigned on 31 March 2026) Alternate Director: Mizran Bin Md Nahar Note : On 1 May 2025, upon his appointment as Interim GCEO, Loh Kok Leong was redesignated as Executive Director. He held this title until 1 February 2026 when he assumed the Non-Independent Non Executive Director role. He resigned as Director and ceased as member of NRC on 31 March 2026.	Member	4/4
Ms Su Puay Leng (Independent Non-Executive Director) (Appointed on 1 May 2025 and Ceased on 1 February 2026)	Member	5/7

Note: Mizran Bin Md Nahar ceased as Alternate Director and was appointed as Non-Independent Non-Executive Director and a member of NRC on 31 March 2026.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

The Nomination and Remuneration Committee (Cont'd)

The NRC is responsible in assisting the Board to ensure composition of the Board remains relevant and effective in meeting the Company's long-term objectives. Nomination to the Board takes into consideration that the Board has appropriate size and a balanced composition with a diverse mix of skills, knowledge, qualifications, experience, age, cultural background and gender diversity to ensure its effectiveness in discharging its duties. The tenure of each Director is reviewed by the NRC and annual re-election of a Director is contingent upon satisfactory evaluation of the Director's performance and contribution to the Board as well as the result of Qualification, Fit and Proper Criteria Assessment.

In addition to the nomination matters, the NRC is further responsible in assisting the Board in overseeing the establishment of a sound remuneration systems that would form a key component of the governance, remuneration and incentive structure through which the Board and Senior Management drive performance, convey acceptable risk-taking behaviour and reinforce the Company's corporate and risk culture.

During the year under review and up to the date of this report, the NRC reviewed and endorsed the disclosures in the NRC Report for the financial year ended 31 December 2025 to ensure the report was prepared in compliance with the relevant regulatory requirements and guidelines in particular MMLR of Bursa Malaysia and MCGG 2021.

The NRC had carried out the following activities in discharging its duties for FYE 2025, inter alia:-

GCEO and C-Level Executives Remunerations and Performance and Staff Bonus Payout

During the year under review and up to the date of this report, the NRC reviewed and endorsed the 2025 Key Performance Indicators for the GCEO and C-Level executives and Financial Year End ("FYE") 2025 performance bonus and 2025 salary increase for GCEO, C-Level Executives and overall FYE 2025 bonus payout.

Board Evaluation

The NRC assists the Board in reviewing its effectiveness, mix of skills and composition via the Board Assessment ("BA") exercise, which is conducted on annual basis. Findings from the BA are used to establish the Board's skills matrix, which is referred to by the Board and the NRC to support the Board's succession planning activities, including strengthening of its talent pool with the right mix of skills and diversity in terms of gender and ethnicity. In addition, BA is undertaken to assess the effectiveness of the Board as a whole and the Board Committees and contribution of each individual Director as well as reviewing the on the level of independence of each INED to ensure alignment with the Company's objectives, strategic goals and compliance with MMLR of Bursa Malaysia.

Board and Board Committees Memberships and Succession Plan

During the year, the NRC oversaw several key senior leadership transitions as disclosed in CTOS' announcements made to Bursa Malaysia. On 24 September 2025, the Company announced the resignation of Chiam Hsing Chee, the Group Chief Financial Officer ("GCFO"), who ceased serving as GCFO on 28 September 2025. The NRC subsequently reviewed and completed the succession process resulting in the appointment of Tan Ming Yew as the new GCFO, effective 13 October 2025.



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Earlier in the year, CTOS announced that its GCEO, Erick Hamburger, would step down, with his last day of service confirmed as 30 September 2025, and that he would be on leave from 1 May 2025 until cessation of employment. In line with its responsibility to ensure leadership continuity, the Board endorsed the NRC's recommendation to appoint Loh Kok Leong, a Non Independent Director, as Interim GCEO effective 1 May 2025 pending the identification of a permanent successor. Subsequently, on 12 December 2025 and 15 January 2026, CTOS announced the appointment of Ankur Sehgal as the new GCEO, effective 16 January 2026, bringing over 20 years of digital banking, credit, risk management and data analytics experience to lead the Group's next phase of growth. Upon Ankur Sehgal's assumption of the Group Chief Executive Officer role on 16 January 2026, Loh Kok Leong relinquished the Interim GCEO role and remained his position as Executive Director until 1 February 2026 when he was re-designated as Non-Independent Non-Executive Director.

Those actions reflected the NRC's continued commitment to transparent governance, careful succession planning, and effective oversight of Board and senior management appointments, ensuring stability and continuity in the Group's leadership throughout the transition periods.

Re-election of Directors at the 2025 Annual General Meeting ("2025 AGM") held on 25 June 2025 during financial year 2025

The NRC endorsed the rotation list of Directors who stood for re-election at the 2025 AGM before recommending it to the Board for approval.

The Directors who stood for re-election had consented for their re-election and signed the Fit and Proper Declaration prior to NRC's assessment, endorsement and recommendation to the Board.

Dato' Noorazman Bin Abd Aziz and Loh Kok Leong were the Directors representing one-third and have been the longest in office and eligible for re-election, pursuant to Clause 76(3) of the Constitution.

Directors' Fees and Benefits

The NRC recommended to the Board for endorsement on the payment of the Directors' Fees for an amount not exceeding RM625,000.00 and Benefits for an amount not exceeding RMI5,000.00 from 26 June 2025 until the next AGM of the Company, for shareholders' approval at the 2025 AGM.

Training for the Board

During the year under review, the NRC reviewed and addressed the training needs of the Board Members. NRC believes that continuous education is essential to keep abreast of industry development and new regulations.

Appointment of New Company Secretaries

During the FYE 2025, the NRC endorsed the appointments of the new Company Secretaries for the approval of the Board, having considered their qualification, experience and knowledge in terms of secretarial practices and governance.

Further, a more detailed description on the remuneration matters is provided in Remuneration Section of this CG Overview Statement.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

The Board Investment Committee (“BIC”)

BIC is responsible to review and make recommendations on all matters in respect of acquisitions and divestments of any business/investment including short term investments, within Malaysia or overseas, subject to the relevant threshold as required under the MMLR of Bursa Malaysia.

For FYE 2025, the BIC comprises entirely of Non-Executive Directors, majority of which are Independent Directors. During the year under review, there were four (4) meetings held. The table below sets out the names of the members of the BIC and their respective attendance record of meetings:-

BIC Members	Designation	Total Number of BIC Meetings Attended during FYE 2025
Su Puay Leng (Independent Non-Executive Director)	Chairperson	4/4
Dato’ Noorazman Bin Abd Aziz (Independent Non-Executive Director)	Member	3/4
Loh Kok Leong (Non-Independent Non-Executive Director) Alternate Director: Mizran Bin Md Nahar Note: On 1 May 2025, upon his appointment as Interim GCEO, Loh Kok Leong was redesignated as Executive Director. He held this title until 1 February 2026 when he assumed the Non-Independent Non Executive Director role. He resigned as Director and ceased as member of BIC on 31 March 2026.	Member	4/4

Note: Mizran Bin Md Nahar ceased as Alternate Director and was appointed as Non-Independent Non-Executive Director and a member of BIC on 31 March 2026.

During the FYE 2025, the BIC contemplated and considered the disposal and sale of the shares held by Enfo Sdn Bhd and CTOS Insights Sdn Bhd (collectively “Vendors”) in Experian Information Services (Malaysia) Sdn Bhd (“EIS”). The Vendors sold 26% equity stake in EIS comprising of 2,600,000 ordinary shares in EIS, to Experian (Malaysia) Sdn Bhd in consideration of a purchase price of RM80 million. The BIC considered the various risk attached to the transaction and advised the management team of the mitigating measures to be adopted in the share sale agreement. The sale was successfully completed on 18 December 2025. BIC convened to receive updates on the associated company foreign entities, as well as to consider feedback on prospective investments.



CORPORATE GOVERNANCE

CORPORATE GOVERNANCE OVERVIEW STATEMENT

Employee Share Option Scheme Committee (“ESOSC”)

ESOSC is responsible for assisting the Board, in implementing and administering the ESOS of the Company in accordance with the By-laws of the ESOS.

As at 31 December 2025, the ESOSC comprises of two (2) Independent Non-Executive Directors and one (1) Executive Director. During the year under review, there was one (1) meeting held. The table below sets out the names of the members of the ESOSC and their respective attendance record of meeting:-

ESOSC Members	Designation	Total Number of ESOSC Meetings Attended during FYE 2025
Lynette Yeow Su-Yin <i>(Independent Non-Executive Director)</i>	Chairperson	1/1
Nirmala A/P Doraisamy <i>(Independent Non-Executive Director)</i>	Member	1/1
Loh Kok Leong <i>(Non-Independent Non-Executive Director)</i> <i>Alternate Director: Mizran Bin Md Nahar</i> <i>Note: On 1 May 2025, upon his appointment as Interim GCEO, Loh Kok Leong was redesignated as Executive Director. He held this title until 1 February 2026 when he assumed the Non-Independent Non Executive Director role. He resigned as Director and ceased as member of ESOSC on 31 March 2026.</i>	Member	1/1

Note:

(1) Mizran Bin Md Nahar ceased as Alternate Director and was appointed as Non-Independent Non-Executive Director and a member of ESOSC on 31 March 2026.

(2) Ankur Sehgal was appointed as Executive Director and a member of ESOSC on 31 March 2026.

During the FYE 2025, the ESOSC had undertaken the following activities in discharging its duties:-

1. To review and approved 2025 Grant (Grant 3) of Employee Share Option Scheme (“ESOS”) 2023/2029.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

Company Secretaries

The Board is supported by competent and qualified Company Secretaries, who play a vital role in advising the Board in relation to the Company's Constitution, the Board's policies and procedures and compliance with the applicable laws and regulations, as well as ensuring the Board's application of the corporate governance practices. The Company Secretaries further assist the Board in effectively discharging its leadership role, fiduciary duties and governance stewardship. All Directors have unrestricted access to the advice and services of the Company Secretaries for the purpose of the conduct of the Board's affairs and the business.

The current Company Secretaries, Ng Cheong Seng and Kooi Ee Lin were duly appointed on 22 September 2025. Both the Company Secretaries are qualified to act as company secretary under Section 235 of the CA 2016. They are Associate member of the Malaysian Institute of Chartered Secretaries and Administrators / member of the Malaysian Institute of Accountants.

The Company Secretaries ensure that the discussions and deliberations at the Board and Board Committees' meetings are well documented and subsequently, communicated to the Management for its next course of action, as well as updating the Board on the follow-up actions taken by the Management of its decisions and recommendations. The Company Secretaries further ensure that the Board is regularly updated and kept abreast of the latest developments in corporate governance, MMLR, directives, and circulars from Bursa Malaysia as well as other legal and regulatory developments.

During the FYE 2025, the Company Secretaries had undertaken various activities in discharging their duties, details of which are outlined in the CG Report.



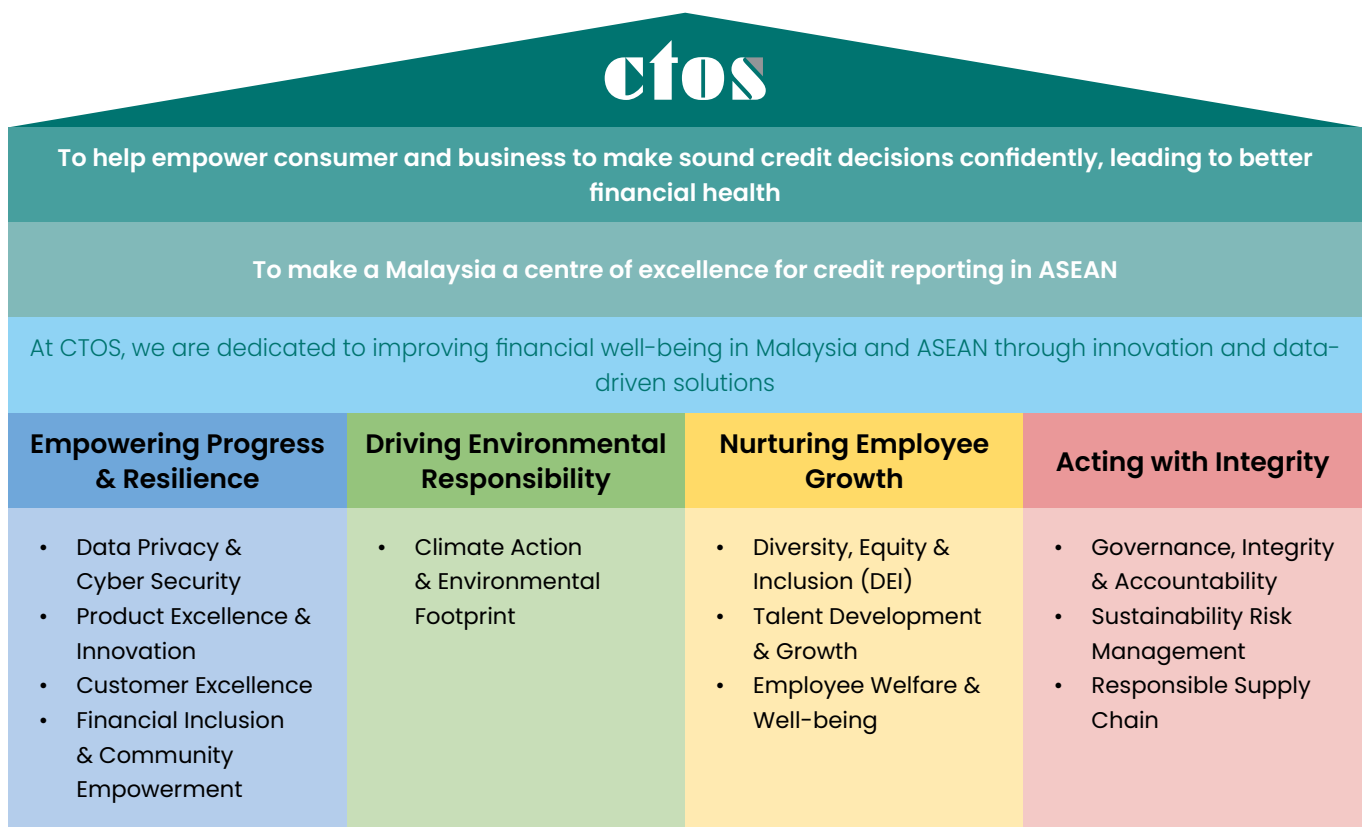
CORPORATE GOVERNANCE

CORPORATE GOVERNANCE OVERVIEW STATEMENT

Sustainability

The Board together with Management are responsible for the governance of sustainability in the Group, including setting the Group's sustainability strategies, priorities and targets. The Board provides guidance and has an oversight role for the Group's sustainability matters including, amongst others, the development and implementation of the sustainability strategies, business plans, major plans of action and risk management.

The Company is committed to sustainability and has implemented various strategies to manage risks effectively while advancing their sustainability goals. Accordingly, it has developed a Sustainability Blueprint that guides its efforts from 2023 to 2025 and it is set out below:-

Sustainability Blueprint

The Company has been included as a constituent of both the FTSE4Good Bursa Malaysia ("FTSE4Good") Index and FTSE4Good Bursa Malaysia Shariah ("F4GBMS") Index in 2025. The FTSE4Good index tracks the performance of public-listed companies against environmental, social and governance ("ESG") practices while the F4GBMS tracks the shariah compliance of constituents on the FTSE4Good index.

The Company's efforts in this regard have been set out in the Sustainability Statement on page 66 of this Integrated Annual Report.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

II. BOARD COMPOSITION

(A) Board Composition and Boardroom Diversity

The Board recognises that a truly diverse and inclusive Board will leverage the differences of its composition to achieve effective stewardship and in turn, retains its competitive advantage. In this respect, the Board through the NRC conducts an annual review of its composition to determine the right size, fit and diversity with independence elements that best serve the Company's objectives and strategic goals.

As at 31 December 2025, the Board consists of five (5) members, comprising four (4) Independent Non-Executive Directors out of which one (1) Independent Non-Executive Chairman, an Executive Director and an Alternate Director to the Executive Director. Currently, the Board consists of six (6) members, comprising four (4) Independent Non-Executive Directors out of which one (1) Independent Non-Executive Chairman, one (1) Executive Director and one (1) Non-Independent Non-Executive Director, following the resignation of Loh Kok Leong and appointments of Ankur Sehgal and Mizran Bin Md Nahar as Directors on 31 March 2026.

The Company believes that having a diverse Board provides a compelling competitive advantage. The Directors collectively bring diverse knowledge, skill, extensive experience and expertise in multiples areas such as corporate strategy, corporate governance, accounting, financial reporting, mergers and acquisitions and securities regulations. The collective pool of experience and expertise enables the Board to effectively and objectively discharge their duties and responsibilities on the Company's strategies, compliance and business operations. By combining contributions with different skills, backgrounds and experiences, the Board can approach problems from a greater range of perspectives, raising challenging questions that foster vigorous discussion and thorough consideration. A multiple-perspective analysis of problems enhances the Board's dynamics and assists in achieving higher quality decisions, as opposed to a 'groupthink' environment.

The Company further respects the cultural diversity in the Company in terms of ethnicity, race, religion and beliefs. Multiculturalism provides a variety of viewpoints along with wide-ranging personal and professional experience, which offer new perspectives for looking at a business issue. It gives rise to out-of-the-box thinking for problems solving and making sound business decisions. The Company embraces the differences and appreciates individual's contribution from different background for creating an inclusive environment where everyone feels valued and respected. These divergences bring unique perspectives and insights for better risk management and allow for difference in opinion and perspectives and all thoughts to be deliberated to enable the Board for making an informed decisions which enhance shareholders' value and build stronger stakeholder engagement.

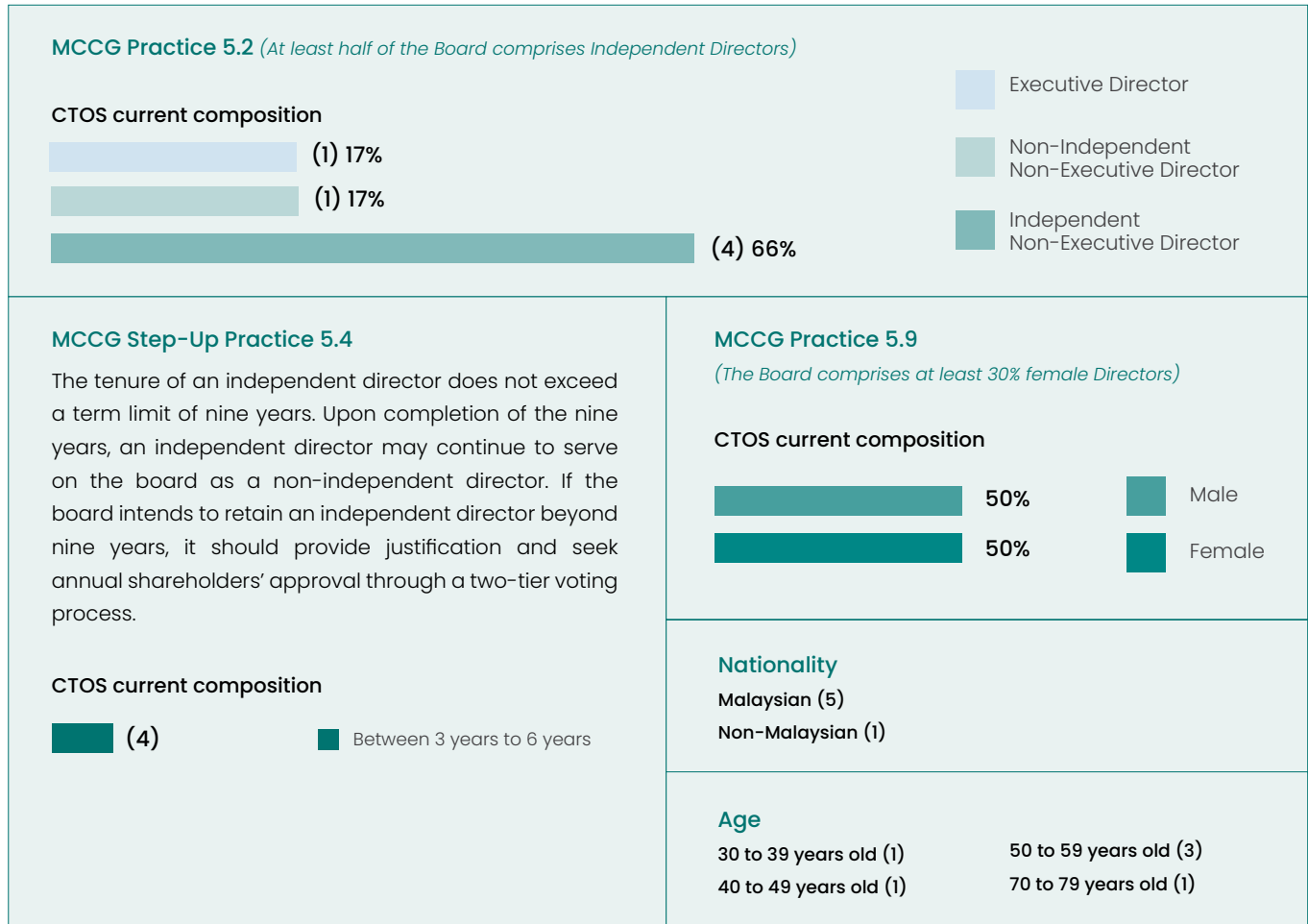
The Board recognises that diversity is a key driver to enhance its effectiveness by allowing a broader scope for debate within itself. Currently, there are three (3) women serving as members of the Board, representing 50% of the Board's composition.



CORPORATE GOVERNANCE

CORPORATE GOVERNANCE OVERVIEW STATEMENT

The Board is satisfied with the current composition as this size is optimal and would enable effective oversight and delegation of responsibilities. A summary of the current Board composition of the Company is set out below:-



In addition, diversity in Senior Management facilitates constructive debates, which leads to better decisions and enabling discussion in an ever-changing environment. The Board further values the diversity of perspectives and experience within the Senior Management which encourages better decision making and competitive advantage.

(B) Board Independence

The Company's current Board comprises of six (6) Directors, out of which four (4) Directors are Independent Non-Executive Directors, including the Chairman of the Company. The present Board composition complies with Paragraph 15.02 of the MMLR of Bursa Malaysia, which requires at least two (2) or one-third (1/3) of the Board of the Company, whichever is higher, to be Independent Directors and applies with Practice 5.2 of the MCCG 2021 whereby 66.67% of the Board composition comprises of Independent Directors.

The Board recognises the importance of significant representation by Directors who are capable and willing to make decisions in the best interest of shareholders, free from any conflict of interest, and independent of Management. The Board is satisfied that the current number of Independent Non-Executive Directors provides a fair check and balance in terms of bringing independence of judgement and ensuring the Board's decisions are made objectively in the best interest of the Company.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

(B) Board Independence (Cont'd)

In line with the MCCG 2021 and the Board Charter, the tenure of an Independent Non-Executive Director should not exceed a cumulative term of nine (9) years. Upon completion of nine (9) years, an Independent Director of the Company may continue to serve on the Board subject to the Director's re-designation as Non-Independent Director. If the Board intends to retain an Independent Non-Executive Director who has served a cumulative term of nine (9) years in the Company, the Board must provide a strong justification and obtain the approval of the shareholders. As at the date of this CG Overview Statement, none of the Independent Non-Executive Director has reached the nine (9) years of service since their appointments. The tenure of the respective Independent Non-Executive Director as at 31 December 2025 are as follows:

Name of Independent Directors	Tenure
Dato' Noorazman Bin Abd Aziz	5 years, 10 months
Lynette Yeow Su-Yin	5 years, 3 months
Nirmala A/P Doraisamy	4 years, 9 months
Su Puay Leng	4 years, 7 months

(C) Appointment and Re-appointment of Directors

The appointments of Board Members are based on objective criteria, merit and with due regard for diversity in skills, experience, age, cultural background and gender. A Director appointed is required to devote sufficient time to serve the Board effectively. The Board considers the overall existing occupational and directorship positions held by the Director, including his/her directorships in listed and non-listed companies. Any appointments that may cast doubt on the fulfilment of the mandatory qualification, fit and proper criteria, integrity and governance of the Company must be duly avoided.

In identifying candidates for the appointment of Directors, the Board does not solely rely on recommendations from existing Directors, Senior Management or major shareholders. The Board is accorded with additional assistance in further utilising independent sources to identify suitably qualified candidates, when necessary. The NRC may consider using executive search firms to assist with the sourcing of candidates with the required skills and background. Pursuant to the NRC TOR, the NRC may utilise independent sources and a variety of approaches to identify suitably qualified candidates. The NRC would disclose the source, including whether such candidates are recommended by the existing Directors, Senior Management or major shareholders.

In addition, the Board had established the Directors' Selection Policy to capture the selection process for the appointment of Directors. Under the said policy, the NRC shall proactively exchange views with Board Members to study and identify the needs of the Company for new Directors and would request nominations from the Board, as well as actively seek suggestions for possible nominees from other sources.



CORPORATE GOVERNANCE

CORPORATE GOVERNANCE OVERVIEW STATEMENT

(C) Appointment and Re-appointment of Directors (Cont'd)

The chart below illustrates the procedures on the appointment of a new Director:



The Board has adopted a Directors' Qualification, Fit and Proper Policy which sets out the approach, guidelines and procedures to ensure that a formal, rigorous and transparent process is adhered to for the appointment, re-appointment and/or re-election of the Directors of the Company. The said policy is available on the Company's website at <https://ctosdigital.com/corporate-governance/>.

Under the Constitution of the Company, a one-third (1/3) of the Directors for the time being, or, if their number is not three (3) or a multiple of three (3), then the number nearest to one-third (1/3), shall retire from office at the conclusion of the AGM in every year provided always that all Directors shall retire from office once at least in each three (3) years, but shall be eligible for re-election. The Directors to retire in every year shall be the Directors who have been longest in office since the Directors' last election, but as between persons who became Directors on the same day, the Directors to retire shall be determined by lot, unless they otherwise agreed among themselves. As provided under the Constitution, any new Director so appointed by the Board either to fill a casual vacancy or to be an addition to the existing Directors shall hold office only until the next AGM and shall then be eligible for re-election.

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Upon the recommendation of the NRC, and based on the satisfactory outcome of the assessment on the qualification, fitness and propriety of Directors, the Board has affirmed that the following Directors, who are retiring either by rotation or upon appointment to a casual vacancy, and who have offered themselves for re-election at the 2026 AGM ("Retiring Directors"), are able to continue to perform effectively and demonstrate commitment:-

Name of Directors	Designation
Lynette Yeow Su-Yin	Independent Non-Executive Director
Ankur Sehgal	Executive Director
Mizran Bin Md Nahar	Non-Independent Non-Executive Director

The NRC also satisfied that the Retiring Directors met the criteria of character, experience, integrity, competence and time to effectively discharge their respective roles as Directors. The Profiles of the Directors standing for re-election are set out on pages 161 to 163 of this Integrated Annual Report.

A statement that the Board is satisfied with the performance evaluation/ character, experience, integrity, competence and time to effectively discharge the roles as Directors of the Retiring Directors, hence endorsing the recommendation of the NRC for the Retiring Directors to be considered for re-election pursuant to the Company's Constitution at the 2026 AGM, is disclosed in the Statement Accompanying the Notice of AGM enclosed in the Company's Annual Report.

The Board ensures shareholders have the information they require to make an informed decision on the appointment and re-election of a Director. This includes details of any interest, position or relationship that might influence, or reasonably be perceived to influence, in a material respect of their capacity to bring an independent judgement to bear on issues before the Board and to act in the best interests of the Company or the Group as a whole.

(D) Annual Evaluation

The Board has adopted a formal and objective annual evaluation of the Board, the Board Committees and the Directors' performance as established under the Directors' Performance Assessment Framework. The Directors' Performance Assessment Framework, developed with the assistance of the NRC, serves as a guidance, on the following:-

1. The assessment on the Board's leadership and effectiveness;
2. The annual assessment of Directors performance in discharging their responsibilities for the governance of Company's sustainability, including setting the Company's sustainability strategies, priorities and targets; and
3. The assessment on the necessary quality, integrity, credibility, and competencies of the Directors that contribute to the development and growth of the Company.

The evaluation process was based on self/peer assessments whereby the Directors assessed themselves and the Board as a whole, as well as the performance of each Board Committee. The criteria and outcome of the assessment were properly documented. The evaluation process is led by the Chairman of the NRC, assisted by the Company Secretaries. Each Director conducts the evaluation via questionnaire in a confidential manner.

The assessment criteria for the Board encompasses mix of skills and experience, board composition, quality of information and decision making, board relationship with management, board activities, board Chairman's roles and responsibility and ESG. For the Board Committees, the assessment criteria focus on their composition, adequacy of information, decision making, access to external advisors etc.



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(D) Annual Evaluation (Cont'd)

Based on the recent assessment, the NRC was satisfied that the Board size and its composition are optimum as the Board comprises individuals with the requisite skills, knowledge, experience, characteristics and competencies to effectively discharge their roles. The Directors had discharged their responsibilities in a commendable manner and contributed to the overall effectiveness of the Board and Board Committees of the Company.

The Directors had committed the time necessary to responsibly fulfil their commitment to the Company during the year. In addition, all the Directors had completed the Director's Qualification Declaration as well as Director's Fit and Proper Criteria Declaration in accordance with the Directors' Qualification, Fit and Proper Policy. Based on the declarations received, all the Directors met the qualification, fit and proper criteria.

The NRC and the Board had further undertaken an annual assessment on the independence of the Independent Directors based on the criteria set out in the MMLR of Bursa Malaysia and upon their assessment, concluded that the current Independent Directors of the Company have fulfilled the criteria for "independence" as prescribed under the MMLR of Bursa Malaysia.

The Board is further satisfied with the level of independence demonstrated by all the Independent Directors during the financial year under review, as well as their ability to exercise objective judgement, provide independent views and act in the best interest of the Company.

(E) Directors' Training

The Board recognises the importance of continuous training for Directors and encourages all Directors to attend workshops, programmes, courses and seminars to stay abreast on relevant business development and industry outlook, as well as changes to statutory requirements and regulatory guidelines.

The Directors are required to evaluate their own training needs on a continuous basis with the overriding objective of staying abreast of regulatory requirements and ongoing business developments. The Board is committed to stay abreast of training programmes and workshops conducted by Bursa Malaysia and other training providers, while receiving updates of new statutory and regulatory requirements from time to time.

The training programmes, conferences and seminars, attended by the Directors during the FYE 2025 are as follows:-

1. Dato' Noorazman Bin Abd Aziz

No.	Seminars/Conferences/Training Programmes Attended
1.	Anti Bribery and Corruption
2.	ESG National Sustainability Reporting Framework (NSFR)
3.	MAP Part II Leading with Impact (LIP)

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2. Lynette Yeow Su-Yin

No.	Seminars/Conferences/Training Programmes Attended
1.	Anti Bribery and Corruption
2.	ESG National Sustainability Reporting Framework (NSFR)
3.	CPR & AED Training
4.	Launch of FIDE Forum's Board Culture and Leadership Report 2025
5.	Cybersecurity Awareness Day
6.	Integrity Training
7.	Corruption Awareness Session
8.	Navigating Digital Disruption
9.	Strategic Shift in Financial Institutions
10.	Khazanah Megatrends Forum 2025
11.	Masterclass on Generative AI by Prof Phil Parker of Insead

3. Nirmala A/P Doraisamy

No.	Seminars/Conferences/Training Programmes Attended
1.	Anti Bribery and Corruption
2.	Driving Sustainable Leadership: Empowering Boards for Lasting Impact
3.	ESG National Sustainability Reporting Framework (NSFR)
4.	Governance of Generative AI
5.	MIA international conference
6.	Energy Asia Conference
7.	Fide Core Module A
8.	Board oversight on sustainability disclosures: understanding IFRS S1 and S2
9.	Petronas Board Excellence - Sustainability Programme
10.	Senior Executive Forum 2025 - Leadership Event - AIM, Australia
11.	FIDE Core Module B
12.	KPMG ESG symposium adopting IFRS S1 and S2



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3. Nirmala A/P Doraisamy (Cont'd)

No.	
13.	AOB Conversation with AC
14.	The responsible AI advantage: Strategic Leadership for the Boards and Executives
15.	Boardroom accountability in AML/CFT/CFP Navigating Asia's evolving regulatory landscape & risk environment
16.	Cloud for directors of regulated financial institutions
17.	Cybersecurity refresher training
18.	Navigating shareholder expectations: remuneration sentiment in Malaysian institutions
19.	Accounting up-skilling

4. Su Puay Leng

No.	Seminars/Conferences/Training Programmes Attended
1.	Anti Bribery and Corruption
2.	ESG National Sustainability Reporting Framework (NSFR)
3.	Board Leadership in Industry Disruption : Steering Companies Through Market Shifts
4.	Insights on H2Energy
5.	Leading for Longevity : The Board's Role in Driving Innovation
6.	When Insolvency Crosses Borders : Are we ready
7.	Reverse Governance : What if the Algorithm Assess the Board

5. Loh Kok Leong

No.	Seminars/Conferences/Training Programmes Attended
1.	ESG National Sustainability Reporting Framework (NSFR)

6. Erick Hamburger Barraza

No.	Seminars/Conferences/Training Programmes Attended
1.	ESG National Sustainability Reporting Framework (NSFR)

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7. Mizran Bin Md Nahar

No.	Seminars/Conferences/Training Programmes Attended
1.	Anti Bribery and Corruption
2.	ESG National Sustainability Reporting Framework (NSFR)

III. REMUNERATION**(A) Remuneration Policies and Procedures**

As the Company prosper, the Board believes in an appropriate level of remuneration by aligning remuneration and performance with the key strategic drivers of long-term growth. The remuneration is designed to align with industry practices, taking into account the appropriate calibre of each Director whilst upholding of shareholders' interests and aimed to attract, retain, and motivate capable directors to effectively manage the Group.

The NRC is responsible for reviewing and recommending the remuneration package for all Directors, GCEO, Senior Management (C-Level Team) and the total performance bonus and yearly salary for all employees of the Group to the Board. The Board has the overall responsibility to determine the remuneration of respective Directors and recommend the Directors' Fees and Benefits for the shareholders' approval at the AGM. For the Non-Executive Directors, the level of remuneration reflects the directorship experience and level of responsibilities undertaken. Each Non-Executive Director receives a base fixed fee.

The Board has remuneration policies and procedures to determine the remuneration of Directors and Senior Management, taking into account the skills, experience and performance required as well as the demands, complexities and performance of the Group. The Group has established the following policies:-

1. Directors' Remuneration Policy; and
2. Senior Management Remuneration and Assessment Framework.

These policies and procedures are periodically reviewed by the NRC to ensure its continuous relevance including salaries, benefits-in-kind, other emoluments and annual performance bonus in detail, ensuring the remuneration remains an attractive retention strategy for the Group while at the same time competitive within the benchmark industry.

Any revisions to the remuneration policy and/or framework as recommended by the NRC will be tabled to the Board for consideration and approval. The Directors' Remuneration Policy is available on the Company's website at <https://ctosdigital.com/corporate-governance/>.

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(C) Remuneration of Group's Senior Management

The Group's remuneration policy takes into account the various levels of Senior Management based on job grade structure, roles and responsibilities and levels of accountability. This ensures that remuneration packages are adequate, fair and reflect the performance of an individual and the Group. For Senior Management of the Company, all bonuses are determined by the Board based on the recommendation of the NRC after reviewing the individual performance appraisals and achievements. The details of the total remuneration of top five Senior Management of the Company for the FYE 2025 (in the bands of RM50,000) are disclosed as below:-

Top five Senior Management	RM000'					
	Salaries	Allowance	Bonus	Benefits	Other Emoluments	Total
Erick Hamburger Barraza - GCEO (Resigned as 30 September 2025)	1,550-1,600	0-50	0-50	0-50	500-550	2,150-2,200
Chiam Hsing Chee - GCFO (Resigned 28 September 2025)	650-700	100-150	200-250	0-50	0-50	950-1,000
James Fancourt Mitchell Group Chief Technology Officer (Resigned 14 July 2025)	450-500	50-100	200-250	0-50	0-50	700-750
Kolev Ivaylo Venkov Group Chief Data & Product (Resigned 29 July 2025)	950-1,000	0-50	0-50	0-50	0-50	1,000-1,050
Tan Ming Yew - GFCO (Appointed 13 October 2025)	150 - 200	0-50	100-150	0-50	0-50	400-450
Sivanathan Subramaniam Group Chief Risk & Compliance Officer (Appointed 17 September 2025)	200-250	0-50	0-50	0-50	0-50	200-250
Premila Sivam Group Chief People Officer (Appointed 17 February 2025)	500-550	50-100	0-50	0-50	0-50	550-600
Lee Shin Mei Chief Executive Officer, CDS	900-950	100-150	100-150	0-50	0-50	1,150-1,200
Benjamin Lau Chi Meng Chief Technology Officer, CDS (Appointed 23 June 2025)	300-350	0-50	0-50	0-50	0-50	350-400



PRINCIPLE B – EFFECTIVE AUDIT AND RISK MANAGEMENT

I. AUDIT COMMITTEE

(A) AC's Composition

The Board has delegated its authority to the AC to carry out the Board's oversight functions on audit matters as outlined under its TOR. The AC assists the Board in carrying out its oversight responsibilities by reviewing financial information and matters that may significantly impact the financial condition or affairs of the business and providing an unbiased review of the effectiveness and efficiency of the Group's internal controls.



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(A) AC's Composition (Cont'd)

The Chairman of AC is not the Chairman of the Board, which assists the Company in ensuring that the impartiality and objectivity of the Board's review on the AC's findings and recommendations remain intact. The AC consists of three (3) Board Members, all of which are Independent Directors with extensive experience in finance, legal, banking and consulting industry contributing to business strategy and CG.

The composition of the AC, the number of meetings, the attendance of AC, the summary of AC activities and Internal Auditors' function during the financial year under review are set out on pages 198 to 201 under AC Report of this Integrated Annual Report.

The composition of the AC

Name of Directors	Designation
Nirmala A/P Doraisamy	Chairperson, Independent Non-Executive Director
Lynette Yeow Su-Yin	Member, Independent Non-Executive Director
Su Puay Leng	Member, Independent Non-Executive Director

All AC Members are financially literate and have sufficient understanding of the Group's business. This enables the AC Members to continuously apply a critical and probing view on the Group's financial reporting process, transactions and other financial information which effectively challenge Management's assertions on the Company's financials.

(B) External Auditors

The Board maintains a constructive and professional relationship with the External Auditors through the AC. This includes discussions on audit plans, audit findings and the review of the financial statements. The External Auditors also have unrestricted access to the AC to raise any issues of concern at any point. In accordance with the AC TOR, private sessions between the AC and the External Auditors are held at least twice a year or as necessary without the presence of the Executive Director or Management, to discuss audit findings and any other observations arising from the audit process.

The AC recognises the importance of upholding independence of its External Auditors with strict no potential conflict of interest. The TOR of the AC stated that no former key audit partner of the External Auditor of the Company shall be appointed as a member of the AC before observing a cooling-off period of at least three (3) years. Presently, none of the AC members is a former key audit partner involved in auditing of the Group. This is in line with the Practice 9.2 of MCCG 2021.

The AC is responsible for the recommendation on the appointment and re-appointment of the Company's External Auditors and the audit fees. The AC carried out an assessment of the performance, independence and suitability of the External Auditors based on the following factors:-

1. the competency, audit quality, experience and resource capacity of the External Auditors in relation to the audit;
2. the persons assigned to the audit;
3. other audit engagements of the audit firm;
4. the External Auditors' ability to meet deadlines in providing services and responding timely to issues as outlined in the external audit plan;
5. the nature and extent of the non-audit services rendered and the appropriateness of the level of fees; and
6. obtaining written assurance from the External Auditors confirming that they are, and have been, independent throughout the conduct of the audit engagement in accordance with the terms of all relevant professional and regulatory requirements.

CORPORATE GOVERNANCE OVERVIEW STATEMENT

(B) External Auditors (Cont'd)

The assessment further considers the information presented in the Annual Transparency Report (“**ATR**”). The audit firm, PricewaterhouseCoopers PLT issued its ATR in 2025 on matters typically covered in the ATR including the firm’s governance and leadership structure as well as measures undertaken by the firm to uphold audit quality and manage risks.

PricewaterhouseCoopers PLT, the External Auditors of the Company have confirmed to the AC that they are, and have been, independent throughout the conduct of the audit engagement in accordance with the terms of relevant professional and regulatory requirements.

Being satisfied with the External Auditors’ performance, technical competence and independence, the AC recommended the re-appointment of PricewaterhouseCoopers PLT as External Auditors. In view thereof, the Board has recommended the re-appointment of the External Auditors for the approval of shareholders at the forthcoming 2026 AGM.

(C) Financial Reporting

The Board aims to present a clear, balanced and comprehensive assessment of the Group’s financial position and prospects that extends to the annual and quarterly financial statements. The Board is responsible for keeping proper accounting records, which disclose with reasonable accuracy at any time of the financial position of the Group and ensuring that the financial statements of the Group are prepared so as to give a true and fair view of the current financial status of the Group in accordance with the Companies Act 2016 and applicable approved financial reporting standards in Malaysia.

The AC assists the Board in discharging its fiduciary duties by ensuring that the audited financial statements and quarterly financial reports are prepared in accordance with the Malaysian Financial Reporting Standards and MMLR of Bursa Malaysia. In presenting the annual audited financial statements and quarterly announcements of results to shareholders, the Board aims to present a balance and fair assessment of the Company’s financial position and prospects. The AC reviews the Company’s quarterly financial results and annual audited financial statements to ensure accuracy, adequacy and completeness prior to presentation to the Board for its approval.

The Statement of Directors’ Responsibility in respect of the preparation of the annual audited financial statements is set out on page 207 of this Integrated Annual Report.

II. RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK

The Board acknowledges the significance of a sound system of risk management and internal control to manage the overall risk exposure of the Group which provides reasonable assurance in ensuring the effectiveness and efficiency of the Group’s operations that is not limited to financial aspects of the business but operational and regulatory compliance. In order to achieve the objectives to protect the Group’s assets and safeguard shareholders’ investments, the RCC has been entrusted by the Board in managing the risks and establishment of the internal control system and processes of the Group.

Any significant issue affecting the existing risks or emerging risks as well as the changes to the action plans to address the risks identified will be discussed during the RCC meetings and brought to the attention of the Board by RCC.

The Statement on Risk Management and Internal Control as set out in this Integrated Annual Report provides an overview of the state of the Group’s Risk Management and Internal Controls Framework within the Group.



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**PRINCIPLE C: INTEGRITY IN CORPORATE REPORTING AND MEANINGFUL RELATIONSHIP WITH STAKEHOLDERS****I. ENGAGEMENT WITH STAKEHOLDERS**

The Company has a dedicated investor relations function led by the Senior Manager of Corporate Communication and Investor Relations and the GCEO is an authorised spokesperson in relation to the disclosure of material information to shareholders and stakeholders.

The Group communicates with its stakeholders through various channels and media. A constructive and effective investor relationship is important to enhance shareholders' value and to keep shareholders and various stakeholders informed of the Group's performance, businesses, corporate affairs and establish a transparent, regular and effective two-ways communication.

Announcements, news, promotions and all relevant updates are posted on the Company's website regularly. The shareholders and other stakeholders can subscribe to the Company's Investor Relations News Alerts via its website for the latest announcements posted to its website. Shareholders may further communicate with the Group on investor relation matters via email or phone call. The contact details are available at www.ctosdigital.com/investor-relations/overview.

The Group's objective is to build long-term relationships with shareholders and potential investors through appropriate channels for the management and disclosure of information. The Group strives to disclose all price sensitive information to the public as soon as practicable and in terms of degree of the disclosures in accordance with the by Bursa Malaysia's Corporate Disclosure Guide.

All public announcements are electronically published and accessible on Bursa Malaysia's website at www.bursamalaysia.com or the Group's website at <https://ctosdigital.com/>. The Group's website includes dedicated sections which provide all relevant information on the Group, including announcements to Bursa Malaysia, share price information as well as the corporate and governance structure of the Group.

The Group communicates with its stakeholders through various means, including:-

- Corporate Website – Provides an essential platform for investors and other stakeholders to access information periodically through the Investor Relations section at www.ctosdigital.com;
- Annual/Extraordinary General Meeting – Offers an opportunity to the shareholders to raise questions and concerns on the Group's performance directly to the Board and Management;
- One-on-One and Group Meetings/Investor Conferences/Roadshows – Meetings with major institutional investors, individual shareholder groups and financial analysts to share and discuss the Group's announcement to Bursa Malaysia and publication on business performance and its strategic plan; and
- Integrated Annual Reports – Comprehensive report on the Group's financial results, business operations and strategic direction.

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I. ENGAGEMENT WITH STAKEHOLDERS (CONT'D)

The information published in the Investors Relations section can be found at <https://ctosdigital.com/investor-relations/>.

During the year under review, the Company increased the engagements with the investment community and conducted more than 50 one-to-one and group meetings. During these engagements, the Group would address the concerns raised therein, where possible, delivering sustainable value to its shareholders. Additionally, the Company remains actively engaged with other investor relations stakeholders such as Bursa Malaysia, Malaysia Investor Relations Association, and other investor relations service providers to ensure that the Group practices the highest standards of transparency and disclosure.

II. CONDUCT OF GENERAL MEETINGS

The Board considers general meetings as the principal forum for dialogue and interaction with shareholders for an effective three-way communication between the shareholders, the Board and the Senior Management of the Company. The shareholders are encouraged to participate in the general meetings, where they are given opportunities to enquire and comment on the Group's performance and operations, which the Board and the Senior Management may clarify issues pertaining to the Group's business activities, performance and other related matters. All Directors, together with the Senior Management team and the External Auditors, attended the 2025 AGM held on 25 June 2025 which provided meaningful responses to the questions raised by the shareholders.

The notice convening the Company's 2025 AGM held on 25 June 2025 was circulated to the shareholders on 30 April 2025, being more than twenty-eight (28) days prior to the AGM. This allowed shareholders sufficient time to prepare for attendance or to appoint proxy(ies) to attend and vote on their behalf. The notice included details of the resolutions tabled for approval, together with clear explanations and relevant background information, reports and recommendations to assist shareholders in making their decisions.

The 2025 AGM was conducted as a physical meeting at One World Hotel, Bandar Utama, Petaling Jaya to provide shareholders with the opportunity to actively participate in the AGM and interact face-to-face with the Board. During the AGM, the shareholders were given the opportunity to raise questions, make suggestions or provide comments, both before and throughout the meeting. All the questions raised were addressed by the Board and Management.

The shareholders who were unable to attend the 2025 AGM in person were encouraged to exercise their voting rights by appointing a proxy. For this purpose, the Company made available the submission of electronic proxy forms ("e-Proxy") via the Remote Participation and Voting ("RPV") facilities.

In compliance with the MMLR of the Bursa Malaysia, the Company had implemented poll voting for all resolutions set out in the Notice of AGM to be voted via electronic means using RPV facilities as well as to expedite verification and counting of votes. An independent scrutineer was appointed to verify and validate the poll results. All resolutions tabled at the 2025 AGM were duly passed, and the results of the meeting, together with the verified poll outcomes, were announced to Bursa Malaysia on the same day.

The Minutes of the 2025 AGM, which include all questions raised during the meeting and the responses provided, have been published on the Company's corporate website.

COMPLIANCE STATEMENT BY THE BOARD ON THE CORPORATE GOVERNANCE OVERVIEW STATEMENT

This statement on the Company's corporate governance practices is made in compliance with Paragraphs 15.25 and 15.08A of the MMLR of Bursa Malaysia.



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CORPORATE GOVERNANCE OVERVIEW STATEMENT

COMPLIANCE STATEMENT BY THE BOARD ON THE CORPORATE GOVERNANCE OVERVIEW STATEMENT (Cont'd)

Upon review and deliberation, the Board is satisfied that to the best of its knowledge, the Company is substantially in adherence with the principles and practices set out in the MCCG 2021 as well as in compliance with the relevant paragraphs under the MMLR of Bursa Malaysia for the financial year under review. Any practices in the MCCG 2021 which has not been implemented during the financial year would be reviewed by the Board and be implemented where practical and relevant to the Group's business.

This statement has been presented and approved by the Board at its meeting held on 24 April 2026.

DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to the Companies Act 2016 ("**the Act**") and Paragraph 15.26(a) of the MMLR of Bursa Malaysia, the Directors are required to prepare the financial statements for each financial year in accordance with the Malaysian Financial Reporting Standards ("**MFRS**"), International Financial Reporting Standards ("**IFRS**") and the requirements of the Act in Malaysia.

The Directors are responsible to ensure that the financial statements give a true and fair view of the financial position of the Group and of the Company at the end of the financial year, and of the financial performance and cash flows of the Group and of the Company for the financial year.

In preparing the financial statements, the Directors have:

- Adopted appropriate accounting policies in accordance with applicable approved accounting standards and applied them consistently;
- Made judgements and estimates that are reasonable and prudent; and
- Prepared the financial statements on a going concern basis.

The Act further requires the Directors to ensure that the Group and of the Company keep such accounting and other records of the Group and of the Company with reasonable accuracy to ensure that the financial statements comply with the provisions of the Act.

The Directors are responsible for taking such steps that are reasonably available to them to safeguard the assets of the Group and of the Company and to prevent and detect fraud and other irregularities.

ADDITIONAL COMPLIANCE**Material Contracts**

There was no material contracts entered into by the Group involving the interests of the Director, Chief Executive Officer and/or major shareholders during the financial year ended 31 December 2025 ("FYE 2025") or still subsisting at the end of the FYE 2025.

Status of Utilisation of Proceeds

During FYE 2025, Enfo Sdn. Bhd. and CTOS Insights Sdn. Bhd., both wholly-owned subsidiaries of the Company, had on 18 December 2025 entered into a sale and purchase agreement with Experian (Malaysia) Sdn. Bhd. for the disposal of a total 2,600,000 ordinary shares, representing 26% equity interest in Experian Information Services (Malaysia) Sdn. Bhd., for a total disposal consideration of RM80 million ("Disposal"). The Disposal was completed on 18 December 2025.

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As of 9 April 2026, the Group have fully utilised RM 80million of the total proceeds from the Disposal. The details of the utilisation of proceeds are set out as follows:

Purpose		Actual Utilisation	Intended Timeframe for Utilisation	Deviation
	RM'000	RM'000		%
Repayment of borrowings	49,000	49,000	Completed	N/A
Capital gains tax	1,600	1,600	Completed	N/A
Working capital requirements and other general corporate purpose	29,400	29,400	Completed	N/A

Recurrent Related Party Transactions

The Company did not seek any shareholders' mandate in respect of Recurrent Related Party Transactions ("RRPT") of a revenue or trading nature and will not be seeking any shareholders' mandate for RRPT at the forthcoming 2026 AGM.

List of Properties

The Group does not have any properties as at the end of the FYE 2025.

Employees' Share Option Scheme

The Company established the Employees' Share Option Scheme ("ESOS") on 12 December 2023. The ESOS scheme is governed by the By-Laws which were approved by the shareholders on 11 December 2023 and is administered by the ESOS Committee which is appointed by the Board of Directors of the Company, in accordance with the By-Laws. The ESOS Committee may from time to time, offer ESOS to eligible employees of the Group.

The maximum number of new shares which may be made available under the ESOS and/or allotted and issued upon vesting of the new shares under the ESOS shall not exceed in aggregate 1% of the total number of issued shares of the Company (excluding treasury shares, if any) at any point in time during the duration of the ESOS.

During the financial year, 4,380,000 options under the ESOS were granted to the eligible employees of the Group. Subject to the terms and conditions of the By-Laws governing the ESOS, the employees shall be entitled to subscribe for new ordinary shares in the Company, to be allotted and issued pursuant to the ESOS ("new shares"), upon meeting the vesting conditions. During the financial year, there were no granting of options under the ESOS to the Non-Executive Directors of the Company.



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CORPORATE GOVERNANCE OVERVIEW STATEMENT

The movement of the ESOS is as follows:

- 1) The total number of options granted, and outstanding options under the ESOS as at 31 December 2025 are set out in the table below:

Description	Numbers of Options issued as at 31 December 2025
As of 1st January 2025	8,360,000
Granted during the financial year	4,380,000
Exercised during the financial year	-
Forfeited during the financial year	(9,095,000)
Outstanding Options exercisable as at 31 December 2025	3,645,000

- 2) The total number of options granted to the Directors and Senior Management, and outstanding options under the ESOS as at 31 December 2025 are set out in the table below:

Description	Description	Senior Management
Granted during the financial year	-	4,380,000
Exercised during the financial year	-	-
Forfeited during the financial year	(1,600,000)	(7,495,000)
Outstanding Options exercisable as at 31 December 2025	-	3,645,000

- 3) Percentage of options granted to Directors and Senior Management under the ESOS are as follows:

Description	Since commencement up to 31 December 2025
Aggregate maximum allocation applicable to directors and senior management	22,905,310
Actual percentage granted	0.02%

- 4) Total number of options granted to Senior Management per Grant under the ESOS are as follows:

Date of Offer	Exercise Price (RM)	Number of Option Granted			Number of Options Forfeited		
		Units	Percentage	Number of Participants	Units	Percentage	Number of Participants
2 January 2025	1.42	1,980,000	45.21%	3	0	0	0
3 June 2025	0.97	2,400,000	54.79%	3	400,000	17%	1
	Total	4,380,000	100.00%	6	400,000	9%	1
Total outstanding Options exercisable as at 1 January 2025							8,360,000
Total outstanding Options exercisable as at 31 December 2025							3,645,000

Note:

(i) There were no options exercised during the financial year ended 31 December 2025.

(ii) There were no grants of options to other category of employees other than Senior Management during the financial year ended 31 December 2025.

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Notes:

The following documents mentioned in the above context are available on the Company's corporate website at <https://ctosdigital.com/corporate-governance/>:

- (1) Anti-Bribery and Anti-Corruption Policy
- (2) Board Charter and the Terms of Reference of the respective Board Committees, namely Audit Committee, Risk and Compliance Committee, Nomination & Remuneration Committee and Board Investment Committee
- (3) Code of Business Conduct and Ethics
- (4) Corporate Governance Report 2025
- (5) Directors' Qualification, Fit & Proper Policy
- (6) Directors' Remuneration Policy
- (7) Whistleblowing Policy



CORPORATE GOVERNANCE

AUDIT COMMITTEE REPORT

The Board presents the Audit Committee (AC) Report, which provides insights into the manner in which the AC discharged its functions for the Company in 2025.

Composition and meeting attendance

The composition of the AC complies with the following requirements:

- a) Paragraph 15.09(1)(a) and (b) of the Bursa Malaysia Securities Berhad's Main Market Listing Requirements (MMLR) which states that the Audit Committee must be composed of not fewer than three members and that all the Audit Committee members must be non-executive directors, with a majority of them being independent directors. The AC comprises of three members who are all Independent Non-Executive Directors (INEDs) that satisfy the test of independence under the MMLR.
- b) Paragraph 15.09(1)(c)(i) of the MMLR which requires at least one member of the Audit Committee to be a qualified accountant. The AC Chairperson, Ms. Nirmala Doraisamy, is a member of the Malaysian Institute of Accountants (MIA) and is a Fellow of the Chartered Institute of Management Accountants in the United Kingdom.
- c) Practice 9.1 of the Malaysian Code on Corporate Governance (Code) that the Chairman of the Audit Committee is not the Chairman of the Board.
- d) Step-up Practice 9.4 of the Code that the Audit Committee comprises solely of independent directors.

The attendance record for FYE 2025 of the Committee members are as follows:

No.	Name	Status of Directorship	Meetings attended
1	Nirmala Doraisamy	Chairperson Independent Non-Executive Director	8 of 8
2	Su Puay Leng	Independent Non-Executive Director	7 of 8
3	Lynette Yeow Su-Yin	Independent Non-Executive Director	7 of 8

During the financial year ended 31 December 2025, the AC convened eight (8) meetings with four (4) scheduled meetings and four (4) special meetings. These meetings were attended by the Group Chief Executive Officer (GCEO), Group Chief Financial Officer (GCFO), Group Chief Risk & Compliance Officer, Group Head of Internal Audit and the Company Secretary as invitees. Other management representatives were also invited to the meetings where required to provide updates and explanations to the AC.

The Board is satisfied that the AC and its members discharged their functions, duties and responsibilities in accordance with the AC's Terms of Reference (TOR) which is available on the Company's website at www.ctosdigital.com.

Summary of activities undertaken by the AC during the financial year

1. Financial performance reporting

- a. Reviewed the annual audited financial statements of the Group and Company, and thereafter, recommended the same to the Board for approval. In reviewing the annual audited financial statements, the AC discussed with Management and the external auditors on the accounting principles and standards that were applied and key assumptions used by Management and their opinion on the items that may affect the financial statements.
- b. In the presence of the GCEO, reviewed the quarterly financial results of the Group and subsequently recommended the same to the Board for approval to be released to Bursa Malaysia. During these meetings, the GCFO presented the quarterly financial reports and highlighted the material variances or movements for the relevant reporting quarters.

CORPORATE GOVERNANCE
AUDIT COMMITTEE REPORT

Summary of activities undertaken by the AC during the financial year (Cont'd)

- c. Reviewed the documents for solvency test on the declarations and payments of dividends, as required by Section 132 of the Companies Act 2016, and thereafter, recommended the same to the Board for approval.

2. External audit

- a. Reviewed the results of the annual audit and deliberated on the audit findings and internal control recommendations, including Management's response to the audit findings.
- b. Reviewed the independence and effectiveness of the external auditors and recommend to the Board to propose to shareholders the re-appointment of the external auditors at the Annual General Meeting of the Company. In relation to independence of external auditors, the AC received formal written statement from the external auditors, re-affirming the following:
 - they have maintained their independence in accordance with the firm's requirements, with the provisions of the *By-Laws on Professional Independence* of the MIA and with the International Ethics Standards Board for Accountants' *International Code of Ethics for Professional Accountants* (including International Independence Standards).
 - the non-audit services provided to the Group during the financial year were in accordance with the independence requirements and that there are no services provided that have compromised their independence as external auditors of the Group.
- c. Reviewed the external auditors' audit plan for the financial year ended 31 December 2025, which outlined the audit scope, key areas of audit emphasis and the audit approach.
- d. Considered in consultation with Management the proposed audit fees of the external auditors for financial year ended 31 December 2025 for recommendation to the Board for approval. The breakdown of fees for the services provided by the external auditors are as follows:

Description	Fee (RM)	Fee percentage
Statutory audit	466,000	56%
Audit related services (<i>review of employee share option scheme services and agreed upon procedures</i>)	9,000	1%
Non-audit related services (<i>annual tax compliance</i>)*	65,650	8%
Non-audit related services (<i>tax advisory</i>)*	289,640	35%
Total	830,290	100%

Note: The auditor's fees for the Group and Company is set out on page 224 of this Integrated Annual Report.

* The non-audit related services were approved by the Board and the Board is satisfied that the independence of the external auditors were not compromised.

In addition, the AC had also carried out an assessment of their performance for the period under review, in accordance with the Company's *Performance Evaluation Framework for External Audit and Internal Audit Function*.

- e. Held two (2) private sessions with the external auditors without Management's presence during the financial year.
- f. Reviewed the policy on provision of non-assurance services by the external auditors and recommended the same to the Board for approval.
- g. Reviewed the Statement on Risk Management and Internal Control (SORMIC), and recommended the same for Board approval, prior to its publication in the 2025 Annual Report.



CORPORATE GOVERNANCE

AUDIT COMMITTEE REPORT

3. Internal Audit (IA)

- a. Reviewed and deliberated the IA reports presented by the Group Head of IA and assessed IA's findings, recommendations and Management's corrective action plans to address IA's recommendations.
- b. Reviewed the status report on the progress of remedial actions taken or to be taken to resolve the outstanding audit findings along with the implementation status of the Management's remedial actions to ensure that the remedial measures are implemented promptly and appropriately.
- c. Reviewed the adequacy and performance of the IA function and its comprehensiveness of the coverage of activities within the Group, including adequacy of resources for the IA function.
- d. Carried out an assessment of the performance of the Group Head of IA for the period under review, in accordance with the Company's Performance Evaluation Framework for External Audit and Internal Audit Function.
- e. Held two (2) private meetings with the Group Head of IA without the presence of Management.
- f. Reviewed and approved the Annual Audit Plan for 2026, to ensure comprehensiveness of the audit coverage of the various aspects of the business including internal control processes, risk management, corporate governance and compliance to regulatory requirements
- g. Reviewed and approved the amendments to the Internal Audit Framework and Charter.

4. Related party transactions and conflict of interest situation

- a. Reviewed, on a quarterly basis, if any, all recurrent related party transactions within the Group to ensure these transactions were at arm's length basis and were in the ordinary course of business; on terms not more favourable than those generally available to the public.
- b. Reviewed the procedures for recurrent related party transactions to ensure that the process and controls were in place to monitor the transactions.
- c. Reviewed the new recurrent related party transactions to be entered within the Group and recommended to the Board for approval.
- d. Reviewed the announcement to Bursa Malaysia to comply with the Listing Requirements and other relevant rules and regulations and reviewed the monitoring of aggregate value of the recurrent and related party transactions and if expected to exceed the percentage ratio threshold within a period of 12 months, which requires announcements and/or shareholders' approval.
- e. Reviewed any conflict of interest or potential conflict of interest situation that arose, persist or may arise within the Group including the measures taken to resolve, eliminate or mitigate such conflicts, if any. There was no conflict of interest or potential conflict of interest situation reported during the financial year other than the interests of Directors in the recurrent related party transactions within the Group.

5. Other matters

- a. Reviewed and endorsed the AC Report and Corporate Governance Overview Statement for Board approval, for the inclusion of these documents in the 2024 Annual Report.
- b. Received quarterly updates on the management of litigation cases from Corporate Legal Affairs.
- c. Reviewed and endorsed the amendments to the Whistleblowing Policy before tabling the same for Board approval.
- d. Verified that the offer of options under the Employee Share Option ("ESOS") offered to the eligible Senior Management during the financial year is in accordance with the By-laws of the ESOS.

CORPORATE GOVERNANCE

AUDIT COMMITTEE REPORT

GIA function

The Board has established an in-house Group Internal Audit (GIA) function to enhance and protect the organisational value of the Group by providing risk-based and objective assurance, advice and insight. GIA helps the Group to accomplish its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the Group's risk management, internal controls, and governance processes. The GIA's mission, scope of work, responsibilities and authority are governed by its Internal Audit Charter, which is approved by the AC.

To maintain its independence, GIA reports functionally to the AC and administratively to the GCEO. The AC reviews the adequacy of the scope and resources of the GIA function as well as the competency and experience of the internal auditors to ensure that the responsibilities of GIA are discharged as guided by the Global Internal Audit Standards.

The scope of work for the GIA function is laid out in the annual audit plan approved by the AC. The contents of the annual audit plan are determined by an annual risk assessment performed independently by the GIA function. Various aspects of the business are covered by the audit plan, such as key internal control processes, risk management, corporate governance & compliance and recurrent related party transactions. The progress and status of the audit plan are presented to the AC on a quarterly basis.

The main activities of the GIA function during 2025 were as follows:

- Performed independent risk assessments on all auditable areas for the purpose of annual audit planning. Factors considered in the planning included potential financial impact, perceived state of controls, feedback from the Management Team, past audit findings and control matters raised by the external auditor.
- Preparation of the annual audit plan for presentation to the AC for review and approval.
- Performed audit reviews based on the approved audit plan and prepared audit reports in which the audit observations, root cause analyses and remedial recommendations were detailed. During the year, reviews related to Information Technology General Controls, compliance to Credit Reporting Agencies Act 2021 and compliance to Section 47(2) of the Central Bank of Malaysia Act 2009 were performed. Ad hoc/ special reviews on vendor management and process improvements as requested by the AC were also performed.
- Conducted meetings throughout the year with the relevant stakeholders to discuss and align on audit-related matters and identify emerging risks to the Group.
- Regularly followed up on outstanding audit issues, especially on the status of implementation and continuity of Management action plans in addressing control gaps that were identified.
- Performed internal self-assessment of the internal audit function's conformance with the Global Internal Audit Standards.
- Provided advice in relation to internal control issues arising from the day-to-day business operations. Where necessary, the IA function also collaborated with Management to promote a culture of practising good internal controls and governance to strive for business efficiency and internal control effectiveness.
- Appointed as the Secretariat of the Whistleblowing Committee and managed the Group's official whistleblowing mailbox. Liaised with the Whistleblowing Committee on the appropriate responses and actions in relation to reports received from whistleblowers. IA carried out investigations as instructed by the Whistleblowing Committee and all investigation reports were tabled at the quarterly AC meetings for review, implementation and closure.
- Reviewed the recurrent related party transactions of the Group on a quarterly basis.
- Reviewed the Risk and Compliance Committee report.
- Validated the Group Sustainability Statement as per Main Market Listing Requirement.

The total costs incurred by IA in discharging its functions and responsibilities in 2025 amounted to RM379,000, as compared to RM342,000 in 2024.



CORPORATE GOVERNANCE

RISK AND COMPLIANCE COMMITTEE REPORT

The Board presents the Risk and Compliance Committee (RCC) Report, which provides insights into the manner in which the RCC discharged its functions for the financial year ended 31 December 2025.

Membership and Meetings

On 5 December 2024, the Board of Directors resolved to separate the Audit and Risk Committee into two distinct committees, namely the Audit Committee (AC) and the Risk and Compliance Committee (RCC), to enhance the effectiveness of oversight and allow for greater focus on risk management and compliance matters.

The composition of the RCC is aligned with Step-Up Practice 10.3 of the Malaysian Code on Corporate Governance (MCCG), which advocates the establishment of a dedicated Risk Management Committee comprising a majority of independent directors. Details of the RCC members and their attendance at meetings held during the financial year are set out below:

No.	Name	Status of Directorship	Appointment	Meetings attended
1	Su Puay Leng	Chairperson Independent Non-Executive Director	Appointed as member on 5 December 2024	7 of 7
2	Nirmala Doraisamy	Independent Non-Executive Director	Appointed as member on 5 December 2024	7 of 7
3	Lynette Yeow Su-Yin	Independent Non-Executive Director	Appointed as member on 1 May 2025 Ceased as a member on 1 February 2026	3 of 4
3	Loh Kok Leong	Non-Independent Non-Executive Director	Appointed as member on 5 December 2024 Ceased as member on 1 May 2025	2 of 3

Note:

(1) On 1 May 2025, upon his appointment as Interim GCEO, Loh Kok Leong was redesignated as Executive Director. He held this title until 1 February 2026 when he assumed the Non-Independent Non-Executive Director role.

(2) After 31 December 2025, Loh Kok Leong was appointed as a member of RCC on 1 February 2026. He resigned as Director and ceased as a member of RCC on 31 March 2026.

(2) Mizran Bin Md Nahar was appointed as Non-Independent Non-Executive Director and a member of RCC on 31 March 2026.

During the financial year ended 31 December 2025, the RCC convened seven (7) meetings with four (4) scheduled meetings and three (3) special meetings.

Summary of activities undertaken by the RCC during the financial year

1. Risk management effectiveness

In line with Practices 10.1 and 10.2 of the Malaysian Code of Corporate Governance (MCCG), the RCC focused on assessing the effectiveness of the Group's risk management and internal control framework. To this end:

- The RCC assisted the Board in overseeing the establishment and ongoing effectiveness of the Group's risk management and internal control framework, with the objective of ensuring that material risks are identified, assessed, and managed within acceptable parameters.
- During the financial year, the RCC reviewed the adequacy and effectiveness of the Group's risk management processes and internal control systems, taking into consideration the evolving risk landscape, business strategy, and emerging and systemic risk trends. These reviews were conducted to provide the Board with assurance on the continued relevance of the Group's risk management framework.

RISK AND COMPLIANCE COMMITTEE REPORT

Membership and Meetings (cont'd)

Summary of activities undertaken by the RCC during the financial year (cont'd)

1. Risk management effectiveness (cont'd)

- c. The RCC received and deliberated on half-yearly enterprise risk assessments, including updates on the Group's corporate risk profile, key risk exposures, and corresponding mitigation strategies. In addition, the Committee reviewed quarterly updates on risk management activities, including the key risk indicators (KRIs), to assess risk trends, evaluate the effectiveness of controls, and ensure timely escalation of material risk matters.
- d. The RCC also monitored cross-functional risk management initiatives aimed at strengthening internal processes, enhancing the control environment, and reinforcing risk awareness across the Group. Where gaps or areas for improvement were identified, the Committee provided direction to Management and monitored the implementation of agreed corrective actions.
- e. In addition, the RCC reviewed updates on the Group's business continuity management and system resilience capabilities. This included assessing the adequacy of business continuity plans, incident response readiness, and system recovery measures to ensure that the Group is prepared to respond effectively to disruptions. The Committee was satisfied that these arrangements were periodically tested and remained broadly fit for purpose, while continuing to emphasise the need for ongoing enhancements in line with the evolving risk landscape.

2. Regulatory and business compliance

The RCC provided oversight of the Group's regulatory and business compliance framework to ensure that applicable legal and regulatory obligations were identified, understood, in compliance and effectively managed across the Group's operations.

- a. During FY2025, the RCC received and deliberated on regular compliance updates from Management, covering key regulatory regimes applicable to the Group's business, including the Credit Reporting Agencies Act 2010 ("CRA Act"), Personal Data Protection Act 2010 ("PDPA"), Competition Act 2010, and the Occupational Safety and Health Act 1994 ("OSHA"). These updates included developments in regulatory requirements, the status of compliance initiatives, and emerging compliance risks relevant to the Group's activities.
- b. The RCC reviewed and assessed compliance action plans developed by Management to address regulatory requirements and evolving obligations, including updates relating to PDPA compliance requirements and occupational safety and health obligations. The Committee assessed the adequacy of controls and mitigation measures implemented, and provided guidance where enhancements were required to support sustained compliance.
- c. In addition, the RCC monitored the progress of compliance-related initiatives and remediation actions to ensure that identified gaps were addressed in a timely and effective manner. Periodic updates on compliance activities were reviewed, including awareness and training programmes, policy updates, and governance enhancements implemented to reinforce a strong culture of compliance across the Group.

3. Anti-Bribery and corruption ("ABAC")

The RCC provided oversight of the Group's ABAC framework to promote ethical business conduct and ensure compliance with the Malaysian Anti-Corruption Commission ("MACC") Act 2009.

- a. During FY2025, the RCC reviewed and recommended enhancements to the Group's ABAC Policy for Board approval to ensure continued alignment with regulatory requirements and evolving best practices. The Committee also oversaw the implementation of ABAC initiatives across the Group, including the strengthening of internal controls and governance processes.



CORPORATE GOVERNANCE

RISK AND COMPLIANCE COMMITTEE REPORT

Membership and Meetings (cont'd)**Summary of activities undertaken by the RCC during the financial year (cont'd)**3. Anti-Bribery and corruption ("ABAC") (cont'd)

- b. The RCC reviewed the findings of the corruption risk assessment conducted during the year, which evaluated the Group's exposure to bribery and corruption risks across its operations. The Committee assessed the adequacy of mitigation measures and action plans developed by Management to address identified risk areas, and monitored the progress of implementation to ensure timely and effective remediation.
- c. In addition, the RCC received periodic updates on ABAC-related activities, including awareness and training programmes, policy updates, control improvements, and monitoring mechanisms, aimed at reinforcing ethical standards and promoting a culture of integrity throughout the Group.

4. Cybersecurity and Information Technology

The RCC maintained active oversight of the Group's cybersecurity posture and information technology ("IT") risk landscape, recognising cybersecurity as a critical risk area with potential operational, financial, and reputational implications for the Group.

- a. During FY2025, the RCC received and deliberated on quarterly cybersecurity updates presented by Management, which included developments in the external cyber threat landscape, emerging cyber risks and the Group's overall cyber resilience.
- b. The Committee assessed the relevance and effectiveness of key risk indicators (KRIs) established to monitor cyber risks, and considered whether these indicators provided timely and meaningful insights to support effective oversight and escalation.
- c. The Committee also reviewed the adequacy of the Group's cybersecurity controls, including preventive, detective, and response measures, provided guidance to Management where enhancements were required to ensure that cyber risks remained within acceptable tolerance levels. In doing so, the Committee emphasised the importance of incident response preparedness, recovery capabilities, and ongoing improvement in security posture in response to the evolving threat landscape.
- d. In addition, the RCC monitored the progress of the Group's IT transformation initiatives, with a focus on system stability, security architecture, and alignment with business objectives. The Committee considered the associated technology risks and provided oversight to ensure that these initiatives were implemented in a manner that supports operational resilience and sustainable growth.
- e. The RCC further reviewed the Group's progress in achieving and maintaining compliance with ISO/IEC 27001 standards, including certification status, identified gaps, and remediation actions undertaken. The Committee also assessed the adequacy of resourcing, expertise, and governance structures supporting cybersecurity and IT risk management.

RISK AND COMPLIANCE COMMITTEE REPORT

Membership and Meetings (cont'd)

Summary of activities undertaken by the RCC during the financial year (cont'd)

5. Litigation Matters

The RCC provided oversight of the Group's legal and material litigation matters to ensure that potential legal risks are appropriately identified, monitored and managed.

- a. During FY2025, the RCC received periodic updates from Management on ongoing material litigation cases and other legal matters, including the status of proceedings and any significant developments. Where applicable, the Committee was also apprised of notices of demand and other potential legal exposures that could have a material impact on the Group.
- b. The RCC considered the potential implications of such matters on the Group's operations, financial position, and reputation, and monitored the actions taken by Management to address such risks to ensure that they were managed in a timely and appropriate manner, including the engagement of external legal counsel where necessary.

6. Sustainability

The RCC provided oversight of the Group's sustainability agenda to support the Board in ensuring that sustainability-related risks and opportunities were identified, assessed, and addressed in an integrated and strategic manner.

- a. During FY2025, the RCC reviewed the Group's progress against its sustainability initiatives, including the achievement of planned activities and milestones in the 2024 plan and the development of the Group's Sustainability priorities and key focus areas for 2025. The Committee considered the alignment of these priorities with the Group's long-term business strategy, taking into account evolving regulatory expectations, stakeholder interests, and emerging sustainability risks.
- b. In line with Practice 4.1 of the MCCG, the RCC supported the Board in overseeing the governance of sustainability within the Group. This included reviewing the Group's sustainability strategies, priorities, and targets, and assessing the adequacy of initiatives implemented to drive progress across environmental, social, and governance pillars.
- c. The RCC also reviewed and recommended the Sustainability Report for Board approval, with a focus on ensuring that the disclosures provide a balanced, meaningful and transparent account of the Group's sustainability performance, initiatives, and commitments. Periodic updates on sustainability matters were presented to the RCC, including progress against key initiatives and areas for improvement.



CORPORATE GOVERNANCE

RISK AND COMPLIANCE COMMITTEE REPORT

Membership and Meetings (cont'd)**Summary of activities undertaken by the RCC during the financial year (cont'd)**7. Governance and continuous improvement

The RCC continued to support the strengthening of the Group's governance framework, with a focus on enhancing the effectiveness, consistency and maturity of risk management and compliance oversight across the Group.

- a. During FY2025, the RCC reviewed opportunities to further improve the effectiveness of the Risk & Compliance function, including adequacy of frameworks, processes, and reporting practices. The Committee provided guidance to Management on areas requiring enhancement and monitored the progress of initiatives undertaken to address identified gaps, with the aim of reinforcing a strong and effective control environment.
- b. The RCC also emphasised the importance of continuous improvement through periodic reviews of policies, procedures, and governance practices to ensure continued relevance and alignment with evolving business needs, regulatory expectations, and leading practices. Particular emphasis was placed on improving the clarity and quality of reporting to support informed oversight and Board level decision making. The RCC further endorsed the implementation of a bid waiver process, as an enhancement to the Procurement Policy, for Board approval.
- c. In discharging its responsibilities, the RCC emphasised the importance of maintaining a proactive and forward looking approach to governance, recognising the need to adapt to changes in the risk landscape and operating environment. Based on the oversight activities undertaken during the year, the RCC was satisfied that appropriate governance arrangements and continuous improvement mechanisms were in place to support sustainable and prudent management of risk and compliance matters across the Group.

CORPORATE GOVERNANCE

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

This Statement on Risk Management and Internal Control is prepared in accordance with paragraph 15.26(b) of Bursa Malaysia's Main Market Listing Requirements, which requires the Board of Directors to disclose in the annual report the state of the Group's risk management and internal control system. This statement describes the nature and scope of the risk management and internal control framework of the Company and its subsidiaries ("CTOS" or "the Group") for the financial year ended 2025.

1. BOARD RESPONSIBILITY

The Board affirms its overall responsibility for establishing a sound system of risk management and internal control for the Company and its subsidiaries. The Board reviews the adequacy, effectiveness, and integrity of Group's risk management framework and internal control system on an ongoing basis.

In discharging its oversight responsibilities, the Board is supported by the Risk and Compliance Committee ("RCC") and Audit Committee ("AC"), which have been delegated primary oversight responsibilities for the Group's risk management and internal control systems. The Board receives periodic reports from the Board Committees to remain informed of their work, key deliberations and decisions on delegated matters. Notwithstanding this delegation, the Board retains full responsibility for the governance and oversight of risk and internal control, including actions undertaken by these Board Committees in the execution of their respective mandates.

The Board continually articulates, implements and reviews the adequacy and effectiveness of the Group's enterprise-wide risk management and internal control system, which is embedded across all aspects of the Group's activities. The Board, through these Board Committees, reviews relevant processes and responsibilities and assesses whether appropriate controls and procedures provide reasonable assurance that material risks are effectively mitigated and that the system remains viable.

The Group CEO and Group CFO have provided assurance to the Board that the Group's risk management and internal control systems are operating adequately and effectively.

2. MANAGEMENT RESPONSIBILITY

The Management is responsible for implementing the policies and procedures established by the Board in relation to risk management and internal control, and for ensuring that risks are effectively managed within the Group's approved risk appetite. The roles and responsibilities of Management includes:

- Identifying, assessing and managing risks within their respective areas of responsibility;
- Implementing and monitoring mitigation actions to ensure risks remain within acceptable thresholds;
- Reporting risk exposures, emerging risks and status of action plans, and escalating significant matters to the Risk Management Committee ("RMC") and the Board where necessary; and
- Ensuring timely remediation of control deficiencies and effectiveness of internal controls.



CORPORATE GOVERNANCE

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

3. RISK MANAGEMENT AND INTERNAL CONTROL PROCESSES**a. Risk Management Framework**

The Risk Management Framework (“Framework”) is aligned to ISO 31000:2018 “Risk Management – Principles and Guidelines”. The Framework provides a structured and consistent approach to risk management implementation across the Group for informed decision-making.

With our Framework, we identify, analyse, evaluate and mitigate the risks to protect the Group from negative financial and non-financial consequences that exceed the risk appetite at operational function, business unit and group levels. All risks relevant to the achievement of business objectives are evaluated and monitored. The relevant controls, action plans and Risk Owners are also identified. Each risk is rated according to its severity level depending on its likelihood and impact.

The principles of our ERM Framework are described in table below:

No.	Principles	Description
1.	Culture of risk ownership	Risk management is integrated into day-to-day activities and decision-making across the Group, with defined accountability at all levels
2.	Defined risk appetite and strategy	The Board establishes and maintains a defined risk appetite aligned to the Group’s objectives to support decision-making and performance outcomes
3.	Governance and oversight	A structured governance framework with clearly defined roles, responsibilities, and reporting lines is established to ensure effective oversight and transparency
4.	Structured and integrated framework	Risk management is implemented through a systematic and structured approach, and integrated into key processes including strategic planning, projects, and change management
5.	Risk identification and monitoring	Risks and uncertainties are identified, assessed, monitored, and reported in a timely manner, including emerging risks and changes in the operating environment
6.	Dynamic and responsive approach	Risk management remains dynamic, interactive, and responsive to internal and external changes, ensuring ongoing relevance and effectiveness
7.	Continuous improvement and capability	The Group commits to continuous improvement of risk management practices, supported by stakeholder involvement, capability development, and appropriate infrastructure

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

3. RISK MANAGEMENT PROCESSES (CONT'D)

b. Risk Appetite

The Group's risk appetite is an integral component of the Group's Risk Management Framework and is driven by both top-down Board leadership and bottom-up involvement of Senior Management at all levels. The risk appetite statement enables the Board and Senior Management to communicate, understand and assess the types and levels of risks that the Group is willing to accept in pursuit of its business and strategic goals. It also reflects the level of risk tolerance and limits to govern, manage and control the Group's risk-taking activities.

The risk appetite is integrated into the strategic planning process and remains dynamic and responsive to the changing internal and external drivers such as market conditions, stakeholders' expectations and internal capabilities. The refined risk appetite, provide a consistent structure in understanding risk and is embedded in the day-to-day business activities and decisions throughout the Group.

c. Risk Governance and Oversight

The Group's risk governance model is supported by a formal organisational structure with clearly defined lines of authority and responsibility. This structure provides a transparent and effective governance framework that promotes active oversight and engagement by Senior Management and the Board in the risk management process, thereby ensuring a consistent and unified view of risk across the Group.

Board

The Board oversees the Group's risk governance by setting the risk framework and appetite, reviewing key and emerging risks, ensuring effective controls, and embedding risk considerations into strategic decisions.

Board Committee – The RCC

The RCC provides board-level oversight on risk exposure as well as the adequacy of risk management framework and its components. It is responsible for overseeing the effective implementation of risk management strategies and practices in line with the tolerance and risk appetite limits as approved by the Board.

Management level – The Risk Management Committee ("RMC")

The RMC supports risk management at the operational level by monitoring the Group's risk profile, ensuring effective identification and mitigation of risks, overseeing implementation of the risk management framework, and escalating significant risk matters to the RCC.

The Group adopts the Three Lines of Defence model to provide a structured and systematic approach to risk management and internal control. The first line of defence comprises business and functional units responsible for identifying, assessing and managing risks in their day-to-day operations. The second line of defence consists of risk management and compliance functions that provide oversight, monitoring and advisory support. The third line of defence is provided by the internal audit function, which independently evaluates the adequacy and effectiveness of the Group's risk management and internal control systems and reports its findings to the relevant Board Committees.



CORPORATE GOVERNANCE

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

3. RISK MANAGEMENT PROCESSES (CONT'D)**c. Risk Governance and Oversight**

Lines of Defence	Roles
First Line	<ul style="list-style-type: none">• The first line of defence is undertaken by Risk Owners within the business and functional units.• Identification of risks arising from daily business activities, including analysis, assessment and prioritisation of risk exposures.• Implementation of appropriate control measures and monitoring of the effectiveness of mitigation action plans.
Second Line	<ul style="list-style-type: none">• The second line of defence is carried out by the Risk and Compliance function.• Establishment and maintenance of the risk management frameworks, policies and procedures.• Provision of risk governance, oversight and constructive challenge to the first line of defence.• Monitoring of compliance with applicable laws, regulations, and internal policies and standards.
Third Line	<ul style="list-style-type: none">• The third line of defence is provided by Group Internal Audit.• Provision of independent assurance on the adequacy and effectiveness of the Group's risk management framework and internal control systems.• Independent reporting to the Audit Committee and, through the Committee, to the Board.

d. Risk and Compliance Culture

The risk and compliance culture of the Group is driven by a strong tone from the top by the Board and Senior Management and at the same time also inculcate an enterprise-wide awareness of risks at all levels of the Group.

As part of the risk and compliance culture, the Group has instilled a culture where the Board, Senior Management and employees are committed to adhere to the requirements of relevant laws, rules, and regulations. This is reiterated in the formalised Risk Appetite Statement. This commitment is further demonstrated through the establishment and enhancement of policies, processes and controls in managing and preventing non-compliances.

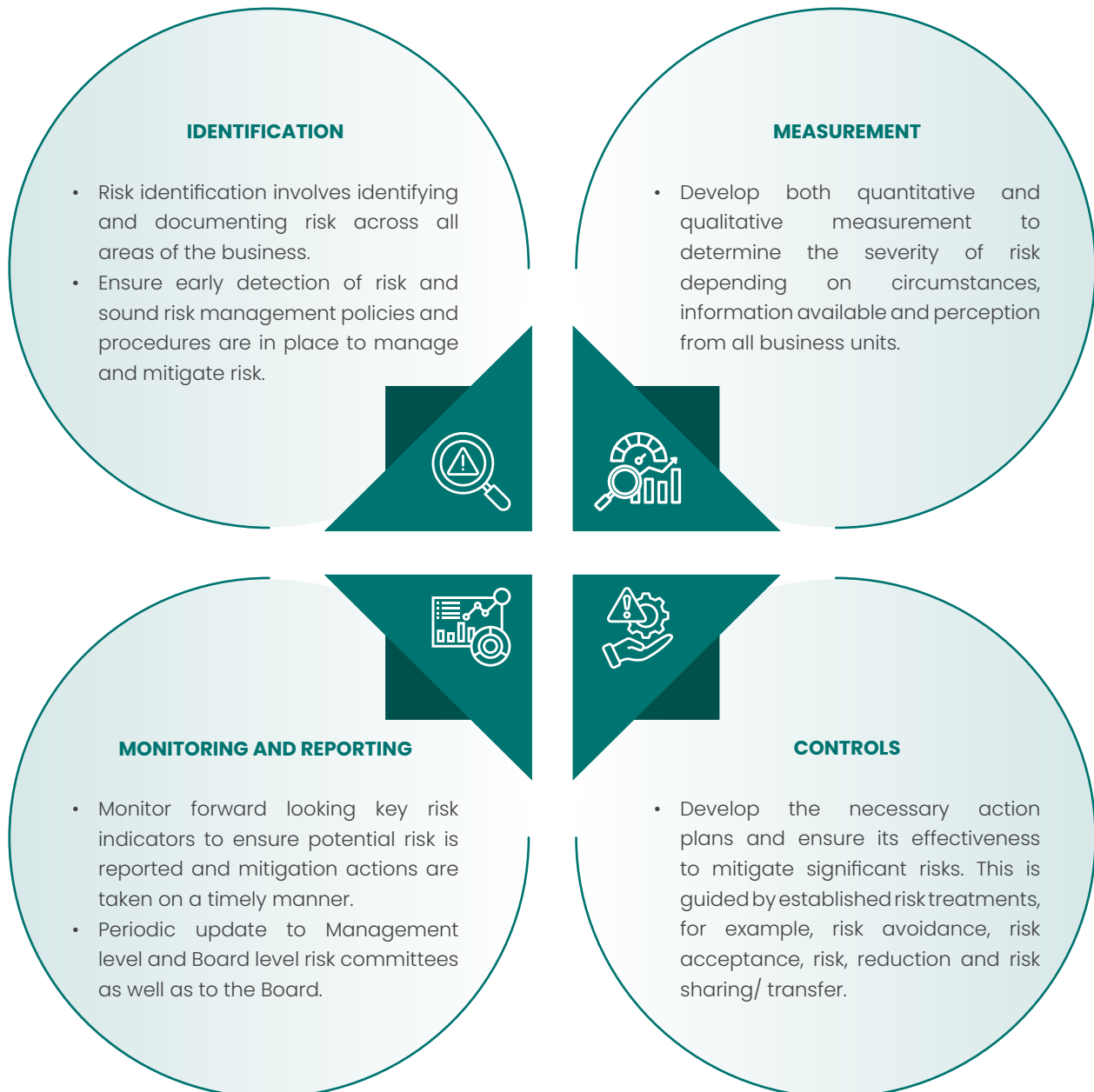
Programmes related to risk and compliance including induction programme and e-Learnings are established and driven by the Board and Senior Management as part of the journey toward effective risk management within the Group.

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

3. RISK MANAGEMENT PROCESSES (CONT'D)

e. Risk Management Processes

The Group's risk management process is guided by ISO31000:2018 Risk Management Guidelines as illustrated below. It comprises of the following elements:



f. Risk Assessment

The Group employs a thorough procedure to conduct risk assessments on a half-yearly basis, fostering a proactive stance in risk management. Additionally, emerging risk and new project risk assessments will be conducted as needed to proactively identify and address new and evolving risks that may impact the Group.



CORPORATE GOVERNANCE

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

4. INTERNAL CONTROL PROCESSES**a. Authority and responsibility**

- The RCC, AC, the Nomination and Remuneration Committee, Board Investment Committee, and the Employee Share Option Scheme Committee are delegated with the selected Board responsibilities through clearly defined Terms of Reference (“TOR”) that are reviewed periodically.
- The Delegation of Authority is in place to manage the Board Committees’ and Management’s authority and authorisation limits in all aspects of the Group’s major business operations and regulatory functions. This includes guidance for entering into contracts, commitments and appropriating assets in the course of conducting the Group’s business.
- Senior Management is accountable for the comprehensiveness of the risk identified, their assessment and their bottom-up reporting as well as ensuring appropriate risk management is being demonstrated. Their principal roles and responsibilities are as follows:
 - Provide executive leadership in the management of risk within their work responsibilities.
 - Review, update and approve their respective divisional risk profile as registered by each business unit.
 - Report risk exposures and status of action plans to the RMC.
 - Ensuring significant risks are considered and assessed during business planning.
 - Ensuring significant risks are mitigated by appropriate mitigation actions.
- As of 31 December 2025, the Group has two executives committees, namely the RMC and the ISO 27001 Steering Committee. Each of these committees has clearly defined terms reference to enable good governance.

b. Planning, monitoring and reporting

Strategic planning activities to set out the Group’s direction and budgetary planning are carried out on an annual basis with budgetary control and monitoring reported on a quarterly basis.

There is a regular and comprehensive flow of information to the Board and Management on all aspects of the Group’s operations to facilitate the monitoring of performance against the Group’s corporate strategy, business, and regulatory plans.

c. Policies and procedures

Clear, formalised and documented internal policies and procedures are in place to ensure continued compliance with internal controls and relevant rules and regulations imposed by the relevant authorities. These policies and procedures are subjected to periodic review and improvement to reflect changes in laws, regulations and resultant changing risks and process enhancement, as and when required. Employees can access common Group policies through the Company’s intranet.

d. Compliance Management

Compliance management is undertaken by the Risk and Compliance function under the oversight of the RCC. It is responsible for ensuring that the Group operates in accordance with applicable laws, regulations and internal policies. This includes regulatory requirements issued by the Registrar of Credit Reporting Agencies under the Ministry of Finance, Bank Negara Malaysia, the Department of Personal Data Protection, the Securities Commission and Bursa Malaysia. The function supports the business by providing advisory on regulatory obligations, facilitating the implementation of compliance frameworks and controls, and monitoring adherence across the Group. It also ensures that relevant regulatory developments are assessed and communicated to Management and the Board, together with appropriate action plans to address any gaps or emerging compliance risks.

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

4. INTERNAL CONTROL PROCESSES (CONT'D)

e. Legal

The Legal function plays a vital role in safeguarding the Group's interests from a legal perspective. It ensures that the Group's operations, policies, procedures, and transactions comply with applicable laws and regulatory requirements, while identifying and managing legal risks to the business. The Legal function also monitors and manages litigation matters and keeps the Board informed of any material legal developments that may impact the Group.

f. Ethic and Integrity

The Group's commitment to upholding integrity in carrying out its duties is evidenced by:

i. Anti-Bribery and Anti-Corruption

The Group adopts a zero-tolerance approach towards all forms of bribery and corruption in its business dealings. The Anti-Bribery and Anti-Corruption ("ABAC") Policy and related procedures were enhanced in FY2025 to further strengthen governance controls and promote the highest standards of integrity and ethical conduct across the Group.

ii. Code of Business Conduct and Ethics

A Code of Business Conduct and Ethics establishes the Group's policy on business conduct and the standards of behaviour and ethical conduct expected of its employees. It outlines the Group's commitment to various aspects, including workplace, preservation and protection of the Group's assets and information, fostering open and honest communication, ethical conduct, interaction with counterparties, business partners, customers, environment and communities, working with joint venture partners and business alliances and dealings with the Government, regulators and political parties.

iii. Whistleblowing Policy

The Group has a Whistleblowing Policy ("WP") and Whistleblowing Investigation Procedures ("WIP") that provides an avenue for any person, including employees, directors, and external parties, to report any improper conduct as defined in the WP against any employee or director in a safe and confidential manner. An employee who reports improper behaviour in good faith shall not be subject to any retaliation, termination or suspension of service, disciplinary action, transfer, demotion, or any other use of authority to obstruct the whistleblower's right to continue performing their duties. The AC is in charge of overseeing the implementation of WP and WIP, as well as ensuring effective administration by Human Resources and GIA.

iv. Awareness Sessions

Regular awareness sessions on Business Conduct and Ethics, as well as ABAC, are conducted to reinforce employees' understanding of acceptable and unacceptable standards of conduct. These sessions also reiterate the Group's zero-tolerance stance against all forms of bribery and corruption and emphasise individual accountability in upholding ethical practices.



CORPORATE GOVERNANCE

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

4. INTERNAL CONTROL PROCESSES (CONT'D)**g. Business Continuity Management ("BCM")**

The Group's BCM framework is designed to enhance organisational resilience by systematically identifying potential disruption scenarios, assessing their operational impact, and facilitating timely recovery to minimise service interruption. The BCM Policy establishes a structured response framework to ensure consistent implementation, governance, and maintenance of BCM activities across the Group, with the objective of safeguarding stakeholders' interests and maintaining continuity of critical operations.

h. Cyber Security and Data Privacy**i. Cyber Security Strategy**

The Group recognises cyber security and data privacy as strategic risks that have direct implications on business resilience, regulatory compliance and stakeholder trust. The Group's cyber security strategy is designed to ensure that critical information assets and digital services are protected, resilient and recoverable from cyber-attacks, while enabling secure adoption of new technologies.

In 2025, the Group completed its 3-year cyber security transformation programme, namely Project Elevate, with the aim of establishing a sound and sustainable cyber maturity baseline across the organisation. Cyber security capabilities are governed through oversight structures and regular engagement with senior management to ensure clear accountability, risk ownership and alignment with business priorities.

Toward the end of 2025, the Group further strengthened its governance and organisational structure by integrating risk management, regulatory compliance, cyber risk and technology risk under C-suite level leadership. This structural realignment reflects the Group's clear direction to elevate risk management to the executive level, enabling holistic oversight, more effective risk trade-offs and stronger accountability across the three lines of defence.

The Group's cyber risk management approach is structured and aligned to the National Institute of Standards and Technology ("NIST") Cybersecurity Framework, providing a common language to identify, protect, detect, respond to and recover from cyber threats. Independent certifications such as ISO 27001 and periodic assurance reviews continue to be undertaken to assess and monitor the effectiveness of key security controls.

ii. Cyber Security Controls, Capabilities and Risk Mitigation

The Group continues to strengthen its cyber security posture through a risk-based programme covering governance, technology, people and third-party dependencies, with focus on outcomes rather than isolated controls. Key areas of maturity include:

Enhanced Protection and Data Safeguards

The Group has strengthened data protection controls to safeguard sensitive business and customer information across on premise and cloud environments. These measures are designed to reduce the risk of data leak, unauthorised access or misuse, particularly as the Group increases its reliance on digital and cloud-based platforms.

Improved Threat Detection and Monitoring Capabilities

The Group has continued to enhance its ability to detect and respond to cyber threats in a timely manner by leveraging advanced analytics, automation and AI-enabled security monitoring capabilities. This is designed to improve visibility across the Group's technology environment, enabling earlier identification of anomalous activities and reducing potential impact from cyber incidents.

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

4. INTERNAL CONTROL PROCESSES (CONT'D)

h. Cyber Security and Data Privacy (cont'd)

ii. Cyber Security Controls, Capabilities and Risk Mitigation (cont'd)

Human Capital Investment

Recognising that effective cyber security and risk management requires strong leadership and expertise, the Group continued to invest in cyber and risk human capital during the year. In 2025, the Group established a new Group Chief Risk and Compliance Officer role to lead cyber and technology risk management, risk management and business compliance at Group level. This appointment signals the Group's intent to embed risk thinking into strategic decision making, strengthen tone from the top, and drive ongoing risk transformation across the organisation. The role works closely with technology and business leaders to ensure that cyber and technology risks are proactively identified, assessed and managed in line with business objectives. The Group also continued to strengthen its cyber security function through targeted talent development and capability building, with a review to enhancing and retaining the necessary expertise to manage current and emerging cyber risks.

Cyber Risk Awareness and Culture

The Group continues to build a strong cyber security culture through targeted awareness programmes, role based training and ongoing reinforcement of individual accountability. Other key efforts include continuing regular phishing simulation exercises, incorporating real-world phishing scenarios, to reinforce vigilance and progressively reduce phishing-related incidents.

Third Party Cyber Risk Oversight

Given increasing reliance on external service providers, the Group continues to enhance its oversight of third party cyber risks through structured assessments and ongoing monitoring, commensurate with the criticality of services provided.

iii. Data Privacy

The Group recognises that data privacy is critical to protecting customer, employee, and partner/vendor information. In particular, the protection of customer data, including credit information, remains a key priority given the nature of the Group's business.

In accordance with regulatory requirements governing credit reporting activities, the Group maintains controls aimed at ensuring that consent is duly obtained, verified and recorded prior to the disclosure of credit information. While certain data collection and processing activities are permitted under the applicable regulatory framework, the disclosure of credit information is subject to strict consent verification, which is embedded within the Group's core operational processes.

To provide independent assurance, the Group's consent verification and credit information disclosure processes are subject to annual independent audits as required by regulators. Audit findings, including any instances of non-compliance, are reported to Management and the Board, with appropriate remedial actions taken where necessary.



CORPORATE GOVERNANCE

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

4. INTERNAL CONTROL PROCESSES (CONT'D)**i. Insurance**

Insurance coverage and appropriate physical safeguards are maintained over the Group's major assets to mitigate potential financial impact arising from unforeseen events that may result in material loss. Senior Management performs an annual review and renewal of insurance policies to ensure coverage remains aligned with the value and risk profile of the assets.

j. Internal Audit Function

Internal audit ("IA") engagements are carried out in accordance with the annual IA plan approved by the AC, taking into account feedback from Senior Management and the Group CEO. IA evaluates the selected areas under the IA scope in terms of risk exposures, compliance with approved policies and procedures, compliance with applicable laws and regulations, and where appropriate, is benchmarked against available best practices.

Where significant gaps in the governance, risk management, and internal control processes are identified during the engagements, IA provides recommendations to Senior Management on potential improvements in the design and methods to increase the effectiveness of existing processes.

IA reports to the AC the results of the engagements including the review of reports prepared by external consultants, if any. The AC takes note of the review results, which include the state of internal controls and the control improvements required and these results are then shared with Senior Management to ensure the Group's internal control system is continuously improved. Follow-up assessments are carried out to determine the status of Management's implementation of IA recommendations and IA will provide quarterly updates to the AC on the progress of the management action plans as well as the progress of the Internal Audit plan.

IA strives to continuously adhere to the mandatory elements of The Institute of Internal Auditors' International Professional Practices Framework, including the Core Principles for the Professional Practice of Internal Auditing, the International Standards for the Professional Practices of Internal Auditing, and the Code of Ethics.

STATEMENT ON RISK MANAGEMENT & INTERNAL CONTROL

REVIEW BY EXTERNAL AUDITORS

This Statement on Risk Management and Internal Control has been reviewed by our external auditor in accordance with Paragraph 15.23 of Bursa Listing's Main Market Listing Requirements for the financial year under review. Their limited assurance review was performed in accordance with Audit and Assurance Practice Guide ("AAPG") 3 issued by the Malaysian Institute of Accountants. AAPG 3 does not require the external auditor to form an opinion on the adequacy and effectiveness of the risk management and internal control system of our Group.

CONCLUSION

The system of internal control provides reasonable, rather than absolute, assurance that the Group will not be adversely affected by any event that could be reasonably foreseen as it strives to achieve its business objectives. However, the Board also notes that no system of internal control can provide absolute assurance in this regard, or absolute assurance against the occurrence of material errors, losses, fraud or other irregularities.

The Board and Senior Management are committed to operating a sound system of internal control and the internal control system will continue to be reviewed, updated and improved upon in line with changes in the operating environment.

For the financial year under review and up to the date of issuance of the financial statements, the Board is satisfied with the adequacy, integrity and effectiveness of the Group's system of risk management and internal control. No material losses, contingencies, or uncertainties have arisen from any inadequate or failure of the Group's system of internal control that would require separate disclosure in the Group's Annual Report.

The Board believes that, in the absence of any evidence to the contrary, the system of internal controls, including the financial, operational and compliance controls and risk management system, maintained by the Group's management, were in place throughout the financial year and up to and as of the date of the report, are adequate to meet the needs of the Group in its current business environment.

This statement is made in accordance with a resolution of the Board dated 24 April 2026.

SECTION 8

FINANCIAL STATEMENTS

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FINANCIAL STATEMENTS

DIRECTORS' REPORT

DIRECTORS' REPORT

The Directors hereby submit their report together with the audited financial statements of the Group and of the Company for the financial year ended 31 December 2025.

PRINCIPAL ACTIVITIES

The principal activity of the Company is investment holding, whilst the principal activities of the Group are credit reporting agency, digital software related services including software development, outsourcing, provision of training services and provision of alternative data credit scoring. Details of the principal activities of the subsidiaries are shown in Note 14 to the financial statements.

There have been no significant changes in the nature of the principal activities of the Group and of the Company during the financial year.

FINANCIAL RESULTS

	Group RM'000	Company RM'000
Profit/(loss) for the financial year attributable to:		
<u>Continued operations</u>		
Owners of the Company	82,416	117,650
Non-controlling interest	(460)	-
<u>Discontinued operation</u>		
Owners of the Company	22,443	-
	104,399	117,650

DIVIDENDS

The dividends declared since the end of the previous financial year were as follows:

	RM'000
In respect of the financial year ended 31 December 2024:	
- Single-tier tax exempt fourth interim dividend of 0.990 sen per share on 2,310,000,000 ordinary shares, paid on 30 April 2025	22,869
In respect of the financial year ended 31 December 2025:	
- Single-tier tax exempt first interim dividend of 0.440 sen per share on 2,310,000,000 ordinary shares, paid on 23 July 2025	10,164
- Single-tier tax exempt second interim dividend of 0.650 sen per share on 2,294,121,000 ordinary shares, paid on 24 October 2025	14,912
- Single-tier tax exempt third interim dividend of 0.750 sen per share on 2,293,421,000 ordinary shares, paid on 28 January 2026	17,325
	65,270

Subsequent to the financial year end, on 29 January 2026, the Company declared a fourth interim single-tier tax-exempt dividend of 0.860 sen per ordinary share amounting to RM19.6 million in respect of the financial year ended 31 December 2025 which will be paid on 28 April 2026.



FINANCIAL STATEMENTS

DIRECTORS' REPORT (CONTINUED)

DIVIDENDS (CONTINUED)

The financial statements for the financial year ended 31 December 2025 do not reflect these dividends. Upon declaration, the cash dividend payment will be accounted for in equity as an appropriation of retained earnings during the financial year ending 31 December 2026.

RESERVES AND PROVISIONS

All material transfers to or from reserves and provisions during the financial year have been disclosed in the financial statements.

SHARE CAPITAL AND TREASURY SHARES

During the financial year, the Company repurchased 34,919,200 of its issued ordinary shares from the open market on Bursa Securities. The cost of repurchasing these shares amounted to RM30,441,074 which was recorded under treasury shares, and direct attributable cost of RM124,000 was charged against retained earnings.

On 17 November 2025, the Company cancelled 19,469,200 of its treasury shares amounted to RM17,231,000 with adjustments of RM4,922,000 and RM12,309,000 to the ordinary share capital and retained earnings respectively.

Other than the above, there were no changes in the issued and paid-up capital of the Company during the financial year.

EMPLOYEES' SHARE OPTION SCHEME

The Company established the Employees' Share Option Scheme ("ESOS") on 12 December 2023. The ESOS scheme is governed by the By-Laws which were approved by the shareholders on 11 December 2023 and is administered by the ESOS Committee which is appointed by the Board of Directors of the Company, in accordance with the By-Laws. The ESOS Committee may from time to time, offer ESOS to eligible employees of the Group.

The maximum number of new shares which may be made available under the ESOS and/or allotted and issued upon vesting of the new shares under the ESOS shall not exceed in aggregate 1% of the total number of issued shares of the Company (excluding treasury shares, if any) at any point in time during the duration of the ESOS.

During the financial year, 4,380,000 units (2024: 9,134,994 units) under the ESOS were granted to the eligible employees of the Group. Subject to the terms and conditions of the By-Laws governing the ESOS, the employees shall be entitled to subscribe for new ordinary shares in the Company, to be allotted and issued pursuant to the ESOS ("new shares"), upon meeting the vesting conditions.

The movement of the ESOS is as follows:

	Company	
	2025 '000	2024 '000
At 1 January	8,360	-
Granted	4,380	9,135
Vested	-	(775)
Forfeited	(9,095)	-
At 31 December	3,645	8,360

The Directors have not been granted any shares since ESOS implementation.

FINANCIAL STATEMENTS
DIRECTORS' REPORT (CONTINUED)

DIRECTORS

The Directors in office during the financial year and during the period from the end of the financial year to the date of the report are:

Dato' Noorazman bin Abd Aziz
Lynette Yeow Su-Yin
Nirmala A/P Doraisamy
Su Puay Leng
Ankur Sehgal (appointed on 31 March 2026)
Mizran Bin Md Nahar (appointed on 31 March 2026)*
Erick Hamburger Barraza (resigned on 1 May 2025)
Loh Kok Leong (resigned on 31 March 2026)

* Ceased as alternate director to Loh Kok Leong and appointed as director on 31 March 2026.

DIRECTORS OF SUBSIDIARIES

Pursuant to Section 253 of the Companies Act 2016, the Directors of the subsidiaries (excluding Directors who are also Directors of the Company) in office since the beginning of the financial year to the date of the report are as follows:

Omar Mahmoud
Puvendran A/L Sangaran
Alan John Thornton
Djati Prabowo
Saravut Krailadsiri (appointed on 23 January 2025)
Angel Dimitrov (appointed on 17 June 2025)
Lee Shin Mei (appointed on 5 November 2025)
Tan Ming Yew (appointed on 4 March 2026)
Chin Kuan Weng (resigned on 14 August 2025)
Ivaylo Venkov Kolev (resigned on 2 September 2025)
Chiam Hsing Chee (resigned on 25 September 2025)
Wong Pau Min (resigned on 1 February 2026)

DIRECTORS' BENEFITS

Since the end of the previous financial year, no Director of the Company has received or become entitled to receive a benefit (other than benefits included in the aggregate amount of emoluments received or due and receivable by the Directors as shown below) by reason of a contract made by the Company or a related corporation with the Director or with a firm of which he/she is a member, or with a company in which the Director has a substantial financial interest.



FINANCIAL STATEMENTS

DIRECTORS' REPORT (CONTINUED)

DIRECTORS' BENEFITS (CONTINUED)

The aggregate amount of emoluments received/receivable by the Directors of the Company during the financial year are as follows:

	Group RM'000	Company RM'000
Fees	448	448
Wages, salaries and bonuses	3,187	-
	3,635	448

There was no benefit-in-kind provided to Directors of the Company during the financial year.

Neither during nor at the end of the financial year was the Company or any of its subsidiaries a party to any arrangements whose object was to enable the Directors to acquire benefits by means of the acquisition of shares in, or debentures of, the Company or any other body corporate.

DIRECTORS' INTERESTS IN SHARES AND DEBENTURES

According to the Register of Directors' Shareholdings required to be kept under Section 59 of the Companies Act 2016, none of the Directors who held office at the end of the financial year held any shares or debentures in the Company or its subsidiaries or its holding company or subsidiaries of the holding company during the financial year except as follows:

	Number of ordinary shares in the Company			
	At 1.1.2025/ Date of appointment	Acquired	Sold	At 31.12.2025
Loh Kok Leong	300,000	-	-	300,000
Lynette Yeow Su-Yin	300,000	-	-	300,000
Su Puay Leng	300,000	-	-	300,000
Mizran Bin Md Nahar	359,400	-	-	359,400

INDEMNITY AND INSURANCE FOR DIRECTORS AND OFFICERS

The Company has effected Directors' and Officers' Liability Insurance for the Directors of the Group and of the Company, for up to a maximum of RM30.0 million for any one claim and in aggregate, at a total premium cost of RM48,610 in the current financial year.

FINANCIAL STATEMENTS
DIRECTORS' REPORT (CONTINUED)

STATUTORY INFORMATION ON THE FINANCIAL STATEMENTS

Before the financial statements of the Group and of the Company were prepared, the Directors took reasonable steps:

- (a) to ascertain that proper action had been taken in relation to the writing off of bad debts and the making of allowance for impairment of doubtful debts and satisfied themselves that all known bad debts had been written off and that adequate allowance had been made for doubtful debts; and
- (b) to ensure that any current assets, which were unlikely to be realised in the ordinary course of business including the values of current assets as shown in the accounting records of the Group and of the Company had been written down to an amount which the current assets might be expected so to realise.

At the date of this report, the Directors are not aware of any circumstances:

- (a) which would render the amounts written off for bad debts or the amount of the allowance for impairment of doubtful debt in the financial statements of the Group and of the Company inadequate to any substantial extent; or
- (b) which would render the values attributed to current assets in the financial statements of the Group and of the Company misleading; or
- (c) which have arisen which render adherence to the existing method of valuation of assets or liabilities of the Group and of the Company misleading or inappropriate.

At the date of this report, there does not exist:

- (a) any charge on the assets of the Group and of the Company which has arisen since the end of the financial year which secures the liabilities of any other person except as disclosed in Note 22 to the financial statements; and
- (b) any contingent liabilities of the Group and of the Company which has arisen since the end of the financial year except as disclosed in Note 30 to the financial statements.

No contingent or other liability of the Group and of the Company has become enforceable or is likely to become enforceable within the period of twelve months after the end of the financial year which, in the opinion of the Directors, will or may affect the ability of the Group and of the Company to meet its obligations when they fall due.

At the date of this report, the Directors are not aware of any circumstances not otherwise dealt with in this report or the financial statements of the Group and of the Company which would render any amount stated in the financial statements misleading.

In the opinion of the Directors:

- (a) the results of the Group's and of the Company's operations during the financial year were not substantially affected by any item, transaction or event of a material and unusual nature; and
- (b) there has not arisen in the interval between the end of the financial year and the date of this report any item, transaction or event of a material and unusual nature likely to affect substantially the results of the operations of the Group and of the Company for the financial year in which this report is made.



FINANCIAL STATEMENTS

DIRECTORS' REPORT (CONTINUED)

SUBSIDIARIES

Details of subsidiaries are set out in Note 14 to the financial statements.

AUDITORS' REMUNERATION

Details of auditors' remuneration are as follows:

	Group RM'000	Company RM'000
Auditors' remuneration		
- fees for statutory audit to PricewaterhouseCoopers PLT (LLP0014401-LCA & AF 1146)	466	226
- fees for audit related services to PricewaterhouseCoopers PLT	9	-
- fees for other services to member firms of PricewaterhouseCoopers PLT	355	10
- fees for statutory audit to other auditors	56	50
	886	286

To the extent permitted by the Companies Act 2016, the Group and the Company have agreed to indemnify PricewaterhouseCoopers PLT, against claims by third parties arising from the statutory audit (for an unspecified amount) as part of the terms of its statutory audit engagement. No payment has been made to reimburse PricewaterhouseCoopers PLT during or since the end of the financial year.

AUDITORS

The auditors, PricewaterhouseCoopers PLT (LLP0014401-LCA & AF 1146), have expressed their willingness to accept re-appointment as auditors.

This report was approved by the Board of Directors on 24 April 2026. Signed on behalf of the Board of Directors:

DATO' NOORAZMAN BIN ABD AZIZ
DIRECTOR

ANKUR SEHGAL
DIRECTOR

Kuala Lumpur

FINANCIAL STATEMENTS

STATEMENTS OF COMPREHENSIVE INCOME

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Revenue	5	326,061	304,850	134,105	97,397
Cost of sales		(104,530)	(83,765)	-	-
Gross profit		221,531	221,085	134,105	97,397
Other income		530	1,250	-	-
Other expenses		(493)	(222)	(96)	-
Selling and marketing expenses		(54,005)	(45,150)	(213)	(268)
Administrative expenses		(100,170)	(85,362)	(9,453)	(7,149)
Finance income	6	303	205	121	65
Finance costs	6	(9,567)	(9,975)	(6,511)	(7,883)
Share of profits of associates	15	31,762	26,803	-	-
Profit before tax	7	89,891	108,634	117,953	82,162
Tax expense	10	(7,935)	(6,558)	(303)	(82)
Profit from continuing operations		81,956	102,076	117,650	82,080
Profit from discontinued operations		22,443	3,820	-	-
Share of profits of associates	15	4,540	3,820	-	-
Gain on disposal of investment in associate	15	17,903	-	-	-
Profit for the financial year		104,399	105,896	117,650	82,080



FINANCIAL STATEMENTS

STATEMENTS OF COMPREHENSIVE INCOME
FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025 (CONTINUED)

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Other comprehensive (loss)/income:					
Items that will be subsequently reclassified to profit or loss:					
Exchange differences on translation of foreign operations		(5,101)	(6,513)	-	-
Share of other comprehensive income of associate accounted for using equity method		21	6	-	-
Items that will not be subsequently reclassified to profit or loss:					
Exchange differences on translation of foreign operations		75	(18)	-	-
Share of other comprehensive loss of associate accounted for using equity method		(150)	(45)	-	-
Other comprehensive loss for the financial year		(5,155)	(6,570)	-	-
Total comprehensive income for the financial year		99,244	99,326	117,650	82,080
Profit/(loss) for the financial year attributable to:					
<u>Continuing operations</u>					
Owners of the Company		82,416	102,451	117,650	82,080
Non-controlling interest		(460)	(375)	-	-
<u>Continuing operations</u>					
Owners of the Company		22,443	3,820	-	-
		104,399	105,896	117,650	82,080
Total comprehensive income/(loss) for the financial year attributable to:					
<u>Continuing operations</u>					
Owners of the Company		77,186	95,899	117,650	82,080
Non-controlling interest		(385)	(393)	-	-
<u>Continuing operations</u>					
Owners of the Company		22,443	3,820	-	-
		99,244	99,326	117,650	82,080
Earnings per share for profit attributable to ordinary equity holders of the Company:					
Basic/diluted (sen)					
From continuing operations	31	3.6	4.4	-	-
From discontinued operations	31	1.0	0.2	-	-

The notes on pages 235 to 327 form part of these financial statements.

FINANCIAL STATEMENTS

STATEMENTS OF FINANCIAL POSITION
AS AT 31 DECEMBER 2025

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
NON-CURRENT ASSETS					
Property, plant and equipment	11	8,527	10,051	7	11
Right-of-use assets	12	19,332	21,868	304	-
Intangible assets	13	156,162	157,787	-	-
Investments in subsidiaries	14	-	-	373,798	373,708
Investments in associates	15	497,690	586,374	504,618	504,618
Receivables, deposits and prepayments	17	781	780	-	-
Deferred tax assets	16	335	1,709	-	-
Amount due from subsidiaries	21	-	-	1,509	-
TOTAL NON-CURRENT ASSETS		682,827	778,569	880,236	878,337
CURRENT ASSETS					
Receivables, deposits and prepayments	17	72,613	73,139	387	309
Amounts due from related parties	18	2,880	1,369	-	-
Amounts due from subsidiaries	21	-	-	32,285	30,128
Tax recoverable		3,519	867	-	9
Cash and bank balances	19	60,263	19,369	3,683	2,494
TOTAL CURRENT ASSETS		139,275	94,744	36,355	32,940
CURRENT LIABILITIES					
Payables and accruals	20	70,467	69,881	19,763	20,578
Contract liabilities	5	13,471	7,805	-	-
Lease liabilities	12	1,478	1,801	34	-
Amounts due to related parties	18	490	1,764	-	-
Amounts due to subsidiaries	21	-	-	46,373	1,691
Borrowings	22	38,576	60,155	38,576	60,155
Tax payable		1,931	2,301	149	-
TOTAL CURRENT LIABILITIES		126,413	143,707	104,895	82,424
NET CURRENT ASSETS/(LIABILITIES)		12,862	(48,963)	(68,540)	(49,484)



FINANCIAL STATEMENTS

STATEMENTS OF FINANCIAL POSITION
AS AT 31 DECEMBER 2025 (CONTINUED)

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
NON-CURRENT ASSETS					
Lease liabilities	12	18,562	20,280	278	-
Deferred tax liabilities	16	2,967	-	-	-
Provision for restoration costs	23	1,242	1,168	-	-
Borrowings	22	65,476	104,816	65,476	104,816
Provision for defined benefit plan		742	141	-	-
TOTAL NON-CURRENT LIABILITIES		88,989	126,405	65,754	104,816
NET ASSETS		606,700	603,201	745,942	724,037
EQUITY					
Share capital	24(a)	579,125	584,047	579,125	584,047
Reverse acquisition reserve		(193,528)	(193,528)	-	-
Equity contribution from shareholders		315	315	315	315
Treasury shares	24(b)	(13,210)	-	(13,210)	-
Other reserves	25	(3,482)	1,508	1,290	1,200
Retained earnings		238,357	211,351	178,422	138,475
Equity attributable to the owners of the Company		607,577	603,693	745,942	724,037
Non-controlling interest		(877)	(492)	-	-
TOTAL EQUITY		606,700	603,201	745,942	724,037

The notes on pages 235 to 327 form part of these financial statements.

FINANCIAL STATEMENTS

STATEMENTS OF CHANGES IN EQUITY

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025

Group	Ordinary shares			Other reserves					Total attributable to owners of the Company RM'000	Non-controlling interest RM'000	Total equity RM'000	
	Number of shares '000	Share capital RM'000	Equity contribution from shareholders RM'000	Treasury shares RM'000	Reverse acquisition reserve ⁽¹⁾ RM'000	Foreign currency translation reserve RM'000	Fair value reserve RM'000	Shared-based payment reserve RM'000				Retained earnings RM'000
At 1 January 2025	2,310,000	584,047	315	-	(193,528)	(6,000)	6,308	1,200	211,351	603,693	(492)	603,201
Profit/(loss) for the financial year	-	-	-	-	-	-	-	-	104,859	104,859	(460)	104,399
Other comprehensive (loss)/income	-	-	-	-	-	(5,101)	21	-	(150)	(5,230)	75	(5,155)
Share-based payment expense	-	-	-	-	-	-	-	90	-	90	-	90
Transaction with owners:												
Dividends paid (Note 29)	-	-	-	-	-	-	-	-	(65,270)	(65,270)	-	(65,270)
Share buy back (Note 24(b))	-	-	-	(30,441)	-	-	-	-	(124)	(30,565)	-	(30,565)
Cancellation of treasury shares (Note 24(b))	(19,469)	(4,922)	-	17,231	-	-	-	-	(12,309)	-	-	-
At 31 December 2025	2,290,531	579,125	315	(13,210)	(193,528)	(11,101)	6,329	1,290	238,357	607,577	(877)	606,700

Note:

⁽¹⁾ The reverse acquisition reserve was created during the acquisition of CTOS Business Systems Sdn. Bhd. ("CBS"), CTOS Data Systems Sdn. Bhd. ("CDS") and Automated Mail Responder Sdn. Bhd. ("AMR") by the Company in 2014. CBS was identified as the accounting acquirer in accordance with MFRS 3 'Business Combination'. The difference between the issued equity of the Company and issued equity of CBS together with the deemed purchase consideration of subsidiaries other than CBS is recorded as reverse acquisition reserve.

FINANCIAL STATEMENTS

STATEMENTS OF CHANGES IN EQUITY
FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025 (CONTINUED)

Group	Ordinary shares			Other reserves					Total attributable to owners of the Company RM'000	Non-controlling interest RM'000	Total equity RM'000
	Number of shares '000	Share capital RM'000	Equity contribution from shareholders RM'000	Reverse acquisition reserve ⁽¹⁾ RM'000	Foreign currency translation reserve RM'000	Fair value reserve RM'000	Shared-based payment reserve RM'000	Retained earnings RM'000			
At 1 January 2024	2,310,000	584,047	315	(193,528)	513	6,292	-	196,749	594,388	(99)	594,289
Profit/(loss) for the financial year	-	-	-	-	-	-	-	106,271	106,271	(375)	105,896
Other comprehensive (loss)/income	-	-	-	-	(6,513)	16	-	(55)	(6,552)	(18)	(6,570)
Share-based payment expense	-	-	-	-	-	-	1,200	-	1,200	-	1,200
Transaction with owners: Dividends paid (Note 29)	-	-	-	-	-	-	-	(91,614)	(91,614)	-	(91,614)
At 31 December 2024	2,310,000	584,047	315	(193,528)	(6,000)	6,308	1,200	211,351	603,693	(492)	603,201

Note:

- ⁽¹⁾ The reverse acquisition reserve was created during the acquisition of CTOS Business Systems Sdn. Bhd. ("CBS"), CTOS Data Systems Sdn. Bhd. ("CDS") and Automated Mail Responder Sdn. Bhd. ("AMR") by the Company in 2014. CBS was identified as the accounting acquirer in accordance with MFRS 3 'Business Combination'. The difference between the issued equity of the Company and issued equity of CBS together with the deemed purchase consideration of subsidiaries other than CBS is recorded as reverse acquisition reserve.

STATEMENTS OF CHANGES IN EQUITY

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025 (CONTINUED)

Company	Number of shares '000	Share capital RM'000	Equity contribution from shareholders RM'000	Treasury shares RM'000	Share-based payment reserve RM'000	Retained earnings RM'000	Total equity RM'000
At 1 January 2025	2,310,000	584,047	315	-	1,200	138,475	724,037
Profit and total comprehensive income for the financial year	-	-	-	-	-	117,650	117,650
Share-based payment expense	25	-	-	-	90	-	90
Transaction with owners:	-	-	-	-	-	(65,270)	(65,270)
Dividends paid	29	-	-	-	-	(124)	(30,565)
Share buy back	24(b)	-	-	(30,441)	-	-	-
Cancellation of treasury shares	24(b)	(4,922)	-	17,231	-	(12,309)	-
At 31 December 2025	2,290,531	579,125	315	(13,210)	1,290	178,422	745,942

Company	Number of shares '000	Share capital RM'000	Equity contribution from shareholders RM'000	Share-based payment reserve RM'000	Retained earnings RM'000	Total equity RM'000
At 1 January 2024	2,310,000	584,047	315	-	148,009	732,371
Profit and total comprehensive income for the financial year	-	-	-	-	82,080	82,080
Share-based payment expense	25	-	-	1,200	-	1,200
Transaction with owners:	-	-	-	-	(91,614)	(91,614)
Dividends paid	29	-	-	-	-	-
At 31 December 2024	2,310,000	584,047	315	1,200	138,475	724,037

The notes on pages 235 to 327 form part of these financial statements.

FINANCIAL STATEMENTS

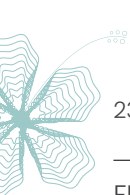
STATEMENTS OF CASH FLOWS
FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
CASH FLOWS FROM OPERATING ACTIVITIES					
Profit before tax:					
Continuing operations		89,891	108,634	117,953	82,162
Discontinued operations		22,443	3,820	-	-
		112,334	112,454	117,953	82,162
Adjustments for:					
Allowance for impairment of receivables - net	27(c)	1,118	938	-	-
Depreciation of property, plant and equipment	11	3,443	3,656	4	5
Depreciation of right-of-use assets	12	2,667	3,476	41	42
Amortisation of intangible assets	13	8,345	9,282	-	-
Dividend income		-	-	(128,781)	(93,779)
Interest income		(303)	(203)	(121)	(63)
Fair value gain on other investments		-	(2)	-	(2)
Gain on disposal of investment in associate	15(a)	(17,903)	-	-	-
Write-off of property, plant and equipment		5	36	-	-
Write-off of intangible assets		45	-	-	-
Impairment of computer software		2,733	-	-	-
(Gain)/loss on derecognition of right-of-use assets		(4)	171	-	(1)
Accretion of provision for restoration costs	23	74	78	-	-
Reversal of restoration costs	23	-	(704)	-	-
Interest expense on bank borrowings	6	8,393	8,800	6,494	7,882
Lease interest	12	1,100	1,097	17	1
Share of profits of associates		(36,302)	(30,623)	-	-
Share-based payment expense		90	1,200	-	338
Defined benefit plan		504	(8)	-	-
Bad debt recovered		(5)	(4)	-	-
Unrealised loss on foreign exchange		416	61	96	3
Operating cash flows before working capital changes		86,750	109,705	(4,297)	(3,412)
Changes in working capital:					
Receivables, deposits and prepayments		(1,919)	(11,015)	(149)	(131)
Payables and accruals		2,720	(4,569)	1,258	(404)
Contract liabilities		5,666	308	-	-
Related party balances		(2,942)	859	(5,110)	(1,851)
Cash flows generated from/(used in) operations - carried forward		90,275	95,288	(8,298)	(5,798)

STATEMENTS OF CASH FLOWS

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025 (CONTINUED)

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
CASH FLOWS FROM OPERATING ACTIVITIES (CONTINUED)					
Cash flows generated from/(used in) operations - carried forward		90,275	95,288	(8,298)	(5,798)
Interest received		303	203	121	63
Tax refunded		168	-	37	-
Tax paid		(6,621)	(6,942)	(182)	(89)
Dividend received		62,613	15,634	128,781	93,779
Net cash flows generated from operating activities		146,738	104,183	120,459	87,955
CASH FLOWS FROM INVESTING ACTIVITIES					
Purchase of property, plant and equipment	11	(1,934)	(4,314)	-	(10)
Purchase of intangible assets	13	(12,384)	(29,230)	-	-
Proceeds from disposal of investment in associate	15(a)	80,000	-	-	-
Withdrawal of money market funds		-	927	-	927
Advances to subsidiaries	21	-	-	(97,553)	(31,745)
Repayment of advances from subsidiaries	21	-	-	99,585	4,687
Net cash flows generated from/(used in) from investing activities		65,682	(32,617)	2,032	(26,141)
CASH FLOWS FROM FINANCING ACTIVITIES					
Restricted cash for term loan facility	19	(51)	(403)	(51)	(403)
Dividends paid	29	(67,349)	(72,210)	(67,349)	(72,210)
Drawdown of borrowings	22	88,000	74,500	88,000	74,500
Repayment of borrowings	22	(149,131)	(58,719)	(149,131)	(58,719)
Payment of lease liabilities	12	(3,268)	(3,490)	(50)	(45)
Transaction cost paid	22	(17)	(1,017)	-	(1,010)
Interest paid	22	(8,164)	(8,136)	(6,282)	(7,225)
Purchase of treasury shares		(30,565)	-	(30,565)	-
Repayment of advances from subsidiaries	21	-	-	-	876
Advances from subsidiaries	21	-	-	50,400	7,060
Repayment of advances to subsidiaries	21	-	-	(6,307)	(5,369)
Net cash flows used in financing activities		(170,545)	(69,475)	(121,335)	(62,545)
NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS		41,875	2,091	1,156	(731)
EFFECT OF EXCHANGE RATE CHANGES		(1,032)	(455)	(18)	(3)
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE FINANCIAL YEAR		17,318	15,682	443	1,177
CASH AND CASH EQUIVALENTS AT THE END OF THE FINANCIAL YEAR	19	58,161	17,318	1,581	443



FINANCIAL STATEMENTS

STATEMENTS OF CASH FLOWS

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2025 (CONTINUED)

The cash flows attributable to the continuing and discontinued operations are as follows:

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Continuing operations</u>					
Cash flows from operating activities		137,614	103,608	120,459	87,955
Cash flows from investing activities		(14,318)	(32,617)	2,032	(26,141)
Cash flows from financing activities		(170,545)	(69,475)	(121,335)	(62,545)
		(47,249)	1,516	1,156	(731)
<u>Discontinued operations</u>					
Cash flows from operating activities		9,124	575	-	-
Cash flows from investing activities		80,000	-	-	-
Cash flows from financing activities		-	-	-	-
		89,124	575	-	-
NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS		41,875	2,091	1,156	(731)

The notes on pages 235 to 327 form part of these financial statements.

FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025

1. GENERAL INFORMATION

The principal activity of the Company is investment holding, whilst the principal activities of the Group are credit reporting agency, digital software related services including software development, outsourcing, provision of training services and provision of alternative data credit scoring.

The address of the registered office and principal place of business of the Company are as follows:

Registered office

Level 5, Guoco Tower
6 Jalan Damanlela
Damansara City, Bukit Damansara
50490 Kuala Lumpur

Principal place of business

Level 17, Menara CelcomDigi
No 6, Persiaran Barat
Seksyen 52, Petaling Jaya
46200 Selangor

2. BASIS OF PREPARATION

The financial statements of the Group and of the Company have been prepared in accordance with the Malaysian Financial Reporting Standards ("MFRS"), International Financial Reporting Standards and the requirements of the Companies Act 2016 in Malaysia. The financial statements have been prepared under the historical cost convention except as disclosed in the summary of material accounting policies in Note 3 to the financial statements.

The preparation of financial statements in conformity with MFRS requires the use of certain critical accounting estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenses during the reported financial period. It also requires the Directors to exercise their judgement in the process of applying the Group's and the Company's accounting policies. Although these estimates and judgement are based on the Directors' best knowledge of current events and actions, actual results may differ.

As at 31 December 2025, the Company was in net current liabilities position of RM68.5 million (2024: RM49.5 million) which was mainly contributed by the Company's borrowings as at 31 December 2025. The Company has prepared the financial statements on a going concern basis premised upon the sufficiency of cash flows to enable the Company to meet its liabilities as and when they fall due and to carry out their operations without a significant curtailment. See Note 27(b) for details.

The areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the financial statements are disclosed in Note 4 of the financial statements.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

2. BASIS OF PREPARATION (CONTINUED)

- (a) Standards, amendments to published standards and interpretations that are effective to the Group and the Company

The amendments and improvements to published standards that are effective for the Group's and the Company's financial year beginning on 1 January 2025 are as follows:

- Amendments to MFRS 121 'Lack of Exchangeability'

The adoption of the above amendments did not have any impact on the amounts recognised in prior periods and are not expected to significantly affect the current or future periods.

- (b) Standards, amendments to published standards and interpretations that are applicable to the Group and the Company but not yet effective

Certain new accounting standards and amendments to accounting standards have been published that are not mandatory for 31 December 2025 reporting periods and have not been early adopted by the Group. None of these is expected to have a significant effect on the consolidated financial statements of the Group, except for the following set out below, for which management is still assessing the impact:

- MFRS 18 'Presentation and Disclosure in Financial Statements' (effective 1 January 2027) replaces MFRS 101 'Presentation of Financial Statements'.

The new MFRS introduces a new structure of profit or loss statement.

- (a) Income and expenses are classified into 3 new main categories:

- (i) Operating category which typically includes results from the main business activities;
- (ii) Investing category that presents the results of investments in associates and joint ventures and other assets that generate a return largely independently of other resources; and
- (iii) Financing category that presents income and expenses from financing liabilities.

- (b) Entities are required to present two new specified subtotals: 'Operating profit or loss' and 'Profit or loss before financing and income taxes'.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

2. BASIS OF PREPARATION (CONTINUED)

- (b) Standards, amendments to published standards and interpretations that are applicable to the Group and the Company but not yet effective (continued)

Management-defined performance measures are disclosed in a single note and reconciled to the most similar specified subtotal in MFRS Accounting Standards.

Changes to the guidance on aggregation and disaggregation which focus on grouping items based on their shared characteristics.

- Amendments to MFRS 9 and MFRS 7 'Amendments to the Classification and Measurement of Financial Instruments' (effective 1 January 2026) have:
 - (a) require financial assets to be derecognised on the date the contractual rights to the cash flows expire and financial liabilities to be derecognised when obligation under the contract is discharged (i.e. the settlement date). In addition, there is an optional exception to derecognise financial liabilities before the settlement date for settlement using electronic payment systems (if specified criteria are met);
 - (b) clarify and add further guidance for assessing whether a financial asset meets the solely payments of principal and interest ("SPPI") criterion;
 - (c) add new disclosures for certain instruments with contractual terms that can change cash flows (such as some financial instruments with features linked to the achievement of environment, social and governance targets); and
 - (d) update the disclosures for equity instruments designated at fair value through other comprehensive income ("FVOCI").

The following amendments are not expected to have a significant impact on the consolidated financial statements of the Group:

- MFRS 19 'Subsidiaries without Public Accountability: Disclosures'
- Annual Improvement to MFRS Accounting Standards for enhanced consistency
- Amendments to MFRS 9 and MFRS 7 'Contracts Referencing Nature-dependent Electricity'



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES

The following accounting policies have been applied consistently in dealing with items that are considered material in relation to the financial statements.

(a) Basis of consolidation

(i) Subsidiaries

Subsidiaries are all entities (including structured entities) over which the Group has control. The Group controls an entity when the Group is exposed to, or has rights to, variable returns from its involvement with the entity and has the ability to affect those returns through its power to direct the relevant activities of the entity. Subsidiaries are fully consolidated from the date on which control is transferred to the Group. They are deconsolidated from the date that control ceases.

The Group applies the acquisition method to account for business combinations when the acquired sets of activities and assets meet the definition of a business. The Group determines that it has acquired a business when the acquired set of activities and assets include an input and a substantive process that together significantly contribute to the ability to create outputs. The consideration transferred for the acquisition of a subsidiary is the fair values of the assets transferred, the liabilities incurred to the former owners of the acquiree and the equity interests issued by the Group. The consideration transferred includes the fair value of any asset or liability resulting from a contingent consideration arrangement and fair value of any pre-existing equity interest in the subsidiary. Identifiable assets acquired and liabilities and contingent liabilities assumed in a business combination are, with limited exceptions, measured initially at their fair values at the acquisition date. The Group recognises any non-controlling interest in the acquiree on an acquisition-by-acquisition basis, either at fair value or at the non-controlling interest's proportionate share of the recognised amounts of acquiree's identifiable net assets.

The excess of the consideration transferred, the amount of any non-controlling interest in the acquiree and the acquisition-date fair value of any previous equity interest in the acquiree over the fair value of the identifiable net assets acquired is recognised as goodwill. If the total of consideration transferred, non-controlling interest recognised and previously held interest measured is less than the fair value of the net assets of the subsidiary acquired in the case of a bargain purchase, the difference is recognised directly in profit or loss. See accounting policy Note 3(e)(i) on goodwill.

Acquisition-related costs are expensed as incurred.

If the business combination is achieved in stages, the carrying value of the acquirer's previously held equity interest in the acquiree is remeasured to fair value at the acquisition date, any gains or losses arising from such re-measurement are recognised in profit or loss.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(a) Basis of consolidation (continued)

(i) Subsidiaries (continued)

Any contingent consideration to be transferred by the Group is recognised at fair value at the acquisition date. Subsequent changes to the fair value of the contingent consideration that is accounted for as an asset or liability is recognised in accordance with MFRS 9 in profit or loss. Contingent consideration that is classified as equity is not remeasured, and its subsequent settlement is accounted for within equity.

Inter-company transactions, balances and unrealised gains on transactions between Group companies are eliminated. Unrealised losses are also eliminated unless the transaction provides evidence of an impairment of the transferred asset. Accounting policies of subsidiaries have been changed where necessary to ensure consistency with the policies adopted by the Group.

Non-controlling interests in the results and equity of subsidiaries are shown separately in the consolidated statement of comprehensive income, statement of changes in equity and statement of financial position respectively.

(ii) Changes in ownership interests in subsidiaries without change of control

Transactions with non-controlling interests that do not result in loss of control are accounted for as transactions with equity owners of the Group. A change in ownership interest results in an adjustment between the carrying amounts of the controlling and non-controlling interests to reflect their relative interests in the subsidiary. Any difference between the amount of the adjustment to non-controlling interests and any consideration paid or received is recognised in equity attributable to owners of the Group.

(iii) Disposal of subsidiaries

When the Group ceases to consolidate because of a loss of control, any retained interest in the entity is remeasured to its fair value with the change in carrying amount recognised in profit or loss. This fair value becomes the initial carrying amount for the purposes of subsequently accounting for the retained interest as an associate, joint venture or financial asset. In addition, any amounts previously recognised in other comprehensive income in respect of that entity are accounted for as if the Group had directly disposed of the related assets or liabilities. This may mean that amounts previously recognised in other comprehensive income are reclassified to profit or loss. Gains or losses on the disposal of subsidiaries include the carrying amount of goodwill relating to the subsidiaries sold.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(a) Basis of consolidation (continued)

(iv) Associates

Associates are all entities over which the Group has significant influence but not control or joint control, generally accompanying a shareholding of between 20% and 50% of the voting rights. Investments in associates are accounted for using the equity method of accounting. Under the equity method, the investment in an associate is initially recognised at cost, and adjusted thereafter to recognise the Group's share of the post-acquisition profits or losses of the associate in profit or loss, and the Group's share of movements in other comprehensive income of the associate in other comprehensive income. Dividends received or receivable from an associate are recognised as a reduction in the carrying amount of the investment. When the Group's share of losses in an associate equals or exceeds its interests in the associate, including any long-term interests that, in substance, form part of the Group's net investment in the associate, the Group does not recognise further losses, unless it has incurred legal or constructive obligations or made payments on behalf of the associate. The Group's investment in associates includes goodwill identified on acquisition.

The Group determines at each reporting date whether there is any objective evidence that the investment in the associate is impaired. An impairment loss is recognised for the amount by which the carrying amount of the associate exceeds its recoverable amount. The Group presents the impairment loss adjacent to 'share of profit/(loss) of associates' in the statement of comprehensive income.

Profits and losses resulting from upstream and downstream transactions between the Group and its associate are recognised in the Group's financial statements only to the extent of unrelated investor's interests in the associates. Unrealised losses are eliminated unless the transaction provides evidence of an impairment of the asset transferred. Accounting policies of associates have been changed where necessary to ensure consistency with the policies adopted by the Group.

When the Group ceases to equity account its associate because of a loss of significant influence, any retained interest in the entity is remeasured to its fair value with the change in carrying amount recognised in profit or loss. This fair value becomes the initial carrying amount for the purposes of subsequently accounting for the retained interest as a financial asset. In addition, any amount previously recognised in other comprehensive income in respect of the entity is accounted for as if the Group had directly disposed of the related assets or liabilities. This may mean that amounts previously recognised in other comprehensive income are reclassified to profit or loss.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(a) Basis of consolidation (continued)

(iv) Associates (continued)

If the ownership interest in an associate is reduced but significant influence is retained, only a proportionate share of the amounts previously recognised in other comprehensive income is reclassified to profit or loss where appropriate.

Dilution gains or losses arising in investments in associates are recognised in profit or loss.

The cost of acquiring an additional stake in an associate is added to the carrying amount of associate and equity accounted. Goodwill arising on the purchase of additional stake is computed using fair value information at the date the additional interest is purchased. The previously held interest is not remeasured.

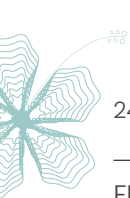
When the Group increases its stake in an existing investment and the investment becomes an associate for the first time, the cost of an associate acquired in stages is measured as the sum of the fair value of the interest previously held plus the fair value of any additional consideration transferred as of the date when the investment became an associate. Any gain or loss on re-measurement of the previously held stake is recognised in profit or loss or other comprehensive income if election has been made under MFRS 9. Any acquisition-related costs are expensed in the periods in which the costs are incurred. Goodwill is determined on acquisition date, based on the difference between the cost of the investment (which comprise of both fair value of consideration transferred for additional interest and fair value of interest previously held) and the Group's share of fair value of the associate's net assets.

(b) Investments in subsidiaries and associates in separate financial statements

In the Company's separate financial statements, investments in subsidiaries and associates are carried at cost less accumulated impairment losses. The cost includes any contingent consideration to be transferred by the Company and is recognised at fair value at the acquisition date. Subsequent changes to the fair value of the contingent consideration that is deemed to be an asset or liability is recognised in accordance with MFRS 9 in profit or loss. Contingent consideration that is classified as equity is not remeasured, and its subsequent settlement is accounted for within equity.

Where an indication of impairment exists, the carrying amount of the investment is assessed and written down immediately to its recoverable amount. See accounting policy Note 3(g) on impairment of non-financial assets.

On disposal of investments in subsidiaries and associates, the difference between disposal proceeds and the carrying amounts of the investments are recognised in profit or loss.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(c) Foreign currencies

(i) Functional and presentation currency

Items included in the financial statements of each of the Group's entities are measured using the currency of the primary economic environment in which the entity operates (the "functional currency"). These financial statements are presented in Ringgit Malaysia ("RM"), which is the Company's functional and presentation currency.

(ii) Transactions and balances

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions or valuation where items are remeasured. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in profit or loss. However, exchange differences are deferred in other comprehensive income when they arose from qualifying cash flow or net investment hedges or are attributable to items that form part of the net investment in a foreign operation.

Foreign exchange gains and losses that relate to borrowings and cash and cash equivalents are presented in profit or loss within administrative expenses. All other foreign exchange gains and losses are presented in profit or loss on a net basis within other income/(expenses).

Changes in the fair value of monetary securities denominated in foreign currency classified as debt instruments at fair value through other comprehensive income ("FVOCI") are analysed between translation differences resulting from changes in the amortised cost of the security and other changes in the carrying amount of the security. Translation differences related to changes in amortised cost are recognised in profit or loss, and other changes in carrying amount are recognised in other comprehensive income.

Non-monetary items that are measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined. Translation differences on assets and liabilities carried at fair value are reported as part of the fair value gain or loss. Translation differences on non-monetary financial assets and liabilities such as equities held at fair value through profit or loss are recognised in profit or loss as part of the fair value gain or loss. Translation differences on non-monetary financial assets, such as equities classified as at fair value through other comprehensive income, are included in other comprehensive income.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(c) Foreign currencies (continued)

(iii) Group companies

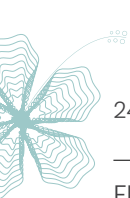
The results and financial position of all the Group entities (none of which has the currency of a hyperinflationary economy) that have a functional currency different from the presentation currency are translated into the presentation currency as follows:

- assets and liabilities for each statement of financial position presented are translated at the closing rate at the date of that statement of financial position;
- income and expenses for each statement of comprehensive income are translated at average exchange rates (unless this average is not a reasonable approximation of the cumulative effect of the rates prevailing on the transaction dates, in which case income and expenses are translated at the rates on the dates of the transactions); and
- all resulting exchange differences are recognised as a separate component of other comprehensive income.

Goodwill and fair value adjustments arising on the acquisition of a foreign entity are treated as assets and liabilities of the foreign entity and translated at the closing rate. Exchange differences arising are recognised in other comprehensive income.

On consolidation, exchange differences arising from the translation of any net investment in foreign entities, and of borrowings and other financial instruments designated as hedges of such investments, are recognised in other comprehensive income.

On the disposal of a foreign operation (that is, a disposal of the Group's entire interest in a foreign operation, or a disposal involving loss of control over a subsidiary that includes a foreign operation, a disposal involving loss of joint control over a joint venture that includes a foreign operation, or a disposal involving loss of significant influence over an associate that includes a foreign operation), all of the exchange differences relating to that foreign operation recognised in other comprehensive income and accumulated in the separate component of equity are reclassified to profit or loss, as part of the gain or loss on disposal. In the case of a partial disposal that does not result in the Group losing control over a subsidiary that includes a foreign operation, the proportionate share of accumulated exchange differences are re-attributed to non-controlling interests and are not recognised in profit or loss. For all other partial disposals (that is, reductions in the Group's ownership interest in associates or joint ventures that do not result in the Group losing significant influence or joint control) the proportionate share of the accumulated exchange difference is reclassified to profit or loss.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(d) Property, plant and equipment

Property, plant and equipment are stated at historical cost less accumulated depreciation and impairment losses. The cost of an item of property, plant and equipment initially recognised includes its purchase price, import duties, non-refundable purchase taxes and any cost that is directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Group and the Company and the cost of the item can be measured reliably. The carrying amount of the replaced part is derecognised. All other repairs and maintenance are recognised as expenses in profit or loss during the financial period in which they are incurred.

Gains or losses on disposals are determined by comparing proceeds with carrying amount and are included in other income/(expenses) in profit or loss.

Property, plant and equipment are depreciated on the straight-line method to write off the cost of property, plant and equipment to their residual values over their estimated useful lives at the following annual rates:

Computers	20% - 33%
Office equipment	20% - 33%
Renovation	15% - 20%
Furniture and fittings	15% - 33%

Work-in-progress will be reclassified to the respective categories of property, plant and equipment and depreciated when the assets are ready for their intended use.

At each reporting date, the Group and the Company assess whether there is any indication of impairment. If such indications exist, an analysis is performed to assess whether the carrying amount of the property, plant and equipment is fully recoverable. A write down is made if the carrying amount exceeds the recoverable amount. See accounting policy Note 3(g) on impairment of non-financial assets.

(e) Intangible assets

The Group acquires intangible assets either as part of a business combination or through separate acquisition. Intangible assets acquired in a business combination are recorded at their fair values at the date of acquisition and recognised separately from goodwill. On initial acquisition, management judgement is applied to determine the appropriate allocation of purchase consideration to the assets being acquired, including goodwill and identifiable intangible assets.

Intangible assets that are considered to have a finite life are amortised on a straight-line basis over the period of expected benefit. Intangible assets that are considered to have an indefinite economic useful life are not amortised but tested for impairment on an annual basis, or where an indication of impairment exists. See accounting policy Note 3(g) on impairment of non-financial assets.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(e) Intangible assets (continued)

(i) Goodwill

Goodwill arises from a business combination and represents the excess of the aggregate of fair value of consideration transferred, the amount of any non-controlling interest in the acquiree and the fair value of any previous equity interest in the acquiree over the fair value of the net identifiable assets acquired and liabilities assumed on the acquisition date. If the fair value of consideration transferred, the amount of non-controlling interest and the fair value of previously held interest in the acquiree are less than the fair value of the net identifiable assets of the acquiree, the resulting gain is recognised in profit or loss.

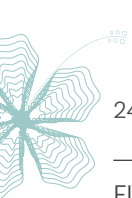
Goodwill is not amortised but it is tested for impairment annually or more frequently if events or changes in circumstances indicate that it might be impaired, and carried at cost less accumulated impairment losses. For the purpose of impairment testing, goodwill acquired in a business combination is allocated to each of the cash generating units ("CGUs"), or groups of CGUs, that is expected to benefit from the synergies of the combination. Each unit or group of units to which the goodwill is allocated represents the lowest level within the entity at which the goodwill is monitored for internal management purposes. Goodwill is monitored at the operating segment level. The carrying value of goodwill is compared to the recoverable amount, which is the higher of value in use and the fair value less costs of disposal. Any impairment is recognised immediately as an expense and is not subsequently reversed.

(ii) Database and customer relationships

Separately acquired database are shown at historical cost. Database and customer relationships acquired in a business combination are recognised at fair value at the acquisition date. The acquired database and customer relationships have a finite useful life and are carried at cost less accumulated amortisation. Amortisation is calculated using the straight-line method over the expected life of the database and customer relationships, not exceeding 5 years.

(iii) License fees

Separately acquired licenses are shown at historical cost. Licenses have a finite useful life and are carried at cost less accumulated amortisation. Amortisation is calculated using the straight-line method to allocate the cost of licenses over their estimated useful lives of 3 years.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(e) Intangible assets (continued)

(iv) Computer software

Costs associated with maintaining computer software programmes are recognised as an expense as incurred. Development costs that are directly attributable to the design and testing of identifiable and unique software products controlled by the Group are recognised as intangible assets when the following criteria are met:

- it is technically feasible to complete the software product so that it will be available for use;
- management intends to complete the software product and use or sell it;
- there is an ability to use or sell the software product;
- it can be demonstrated how the software product will generate probable future economic benefits;
- adequate technical, financial and other resources to complete the development and to use or sell the software product are available; and
- the expenditure attributable to the software product during its development can be reliably measured.

Directly attributable costs that are capitalised as part of the software product include the software development employee costs and an appropriate portion of relevant overheads.

Other development expenditures that do not meet these criteria are recognised as an expense as incurred. Development costs previously recognised as an expense are not recognised as an asset in a subsequent period.

Computer software development costs are recognised as assets. The assets are amortised using the straight-line method from the point at which the asset is ready for use over their estimated useful lives of 2 to 7 years (2024: 2 to 5 years).

During the current financial year, the Group performed an assessment of the estimated useful lives of certain computer software and revised the useful lives from 5 years to 7 years to better reflect the period over which the assets are utilised. The impact of this change in accounting estimates arising from the change in useful lives is disclosed in Note 13 to the financial statements.

Work-in-progress will be reclassified to computer software and amortised when the assets are ready for their intended use.

Some computer software is part of a system that cannot operate without being integrated with the related hardware. The Group treats this computer software as property, plant and equipment as it is an integral part of the property, plant and equipment. The Group uses judgement to assess which element is more significant. When the software is not an integral part of the related hardware, computer software is treated as an intangible asset.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(f) Financial instruments

A financial instrument is any contract that gives rise to both a financial asset of one enterprise and a financial liability or equity instrument of another enterprise.

A financial asset is any asset that is cash, a contractual right to receive cash or another financial asset from another enterprise, a contractual right to exchange financial instruments with another enterprise under conditions that are potentially favourable, or an equity instrument of another enterprise.

A financial liability is any liability that is a contractual obligation to deliver cash or another financial asset to another enterprise, or to exchange financial instruments with another enterprise under conditions that are potentially unfavourable.

Financial assets

(i) Classification

The Group and the Company classify their financial assets to be measured at amortised cost.

The classification depends on the entity's business model for managing the financial assets and the contractual terms of the cash flows.

The Group and the Company reclassify debt investments when and only when its business model for managing those assets changes.

(ii) Recognition and derecognition

Regular way purchases and sales of financial assets are recognised on trade-date, the date on which the Group and the Company commit to purchase or sell the asset. Financial assets are derecognised when the rights to receive cash flows from the financial assets have expired or have been transferred and the Group and the Company have transferred substantially all the risks and rewards of ownership.

(iii) Measurement

At initial recognition, the Group and the Company measure a financial asset at its fair value plus, in the case of a financial asset not at fair value through profit or loss ("FVTPL"), transaction costs that are directly attributable to the acquisition of the financial asset. Transaction costs of financial assets carried at FVTPL are expensed in profit or loss.

Financial assets with embedded derivatives are considered in their entirety when determining whether their cash flows are solely payment of principal and interest ("SPPI").



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(f) Financial instruments (continued)

Financial assets (continued)

(iii) Measurement (continued)

Debt instruments

Subsequent measurement of debt instruments depends on the Group's and the Company's business model for managing the asset and the cash flow characteristics of the asset. Assets that are held for collection of contractual cash flows where those cash flows represent SPPI are measured at amortised cost. Interest income from these financial assets is included in other income/(expenses) using the effective interest rate method. Any gain or loss arising on derecognition is recognised directly in profit or loss and presented in other income/(expenses) together with foreign exchange gains and losses. Impairment losses are presented within administrative expenses in the statement of comprehensive income.

(iv) Subsequent measurement - impairment

The Group and the Company assess on a forward looking basis the expected credit loss ("ECL") associated with its debt instruments carried at amortised cost. The impairment methodology applied depends on whether there has been a significant increase in credit risk.

The Group and the Company have few types of financial instruments that are subject to the ECL model:

- trade receivables;
- other receivables;
- deposits;
- amounts due from subsidiaries; and
- amounts due from related parties.

While cash and cash equivalents are also subject to the impairment requirements of MFRS 9, the identified impairment loss was immaterial.

ECL represents a probability-weighted estimate of the difference between present value of cash flows according to contract and present value of cash flows the Group and the Company expect to receive, over the remaining life of the financial instrument.

The measurement of ECL reflects:

- an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes;
- the time value of money; and
- reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(f) Financial instruments (continued)

Financial assets (continued)

(iv) Subsequent measurement - impairment (continued)

- (a) General 3-stage approach for other receivables, deposits, amounts due from subsidiaries and amounts due from related parties

At each reporting date, the Group and the Company measure ECL through loss allowance at an amount equal to 12-month ECL if credit risk on a financial instrument or a group of financial instruments has not increased significantly since initial recognition. For all other financial instruments, a loss allowance at an amount equal to lifetime ECL is required.

- (b) Simplified approach for trade receivables

The Group and the Company apply the MFRS 9 simplified approach to measure ECL which uses a lifetime ECL for all trade receivables.

Significant increase in credit risk

The Group and the Company consider the probability of default upon initial recognition of asset and whether there has been a significant increase in credit risk on an ongoing basis throughout each reporting period. To assess whether there is a significant increase in credit risk, the Group and the Company compare the risk of a default occurring on the asset as at the reporting date with the risk of default as at the date of initial recognition. It considers available reasonable and supportable forward-looking information.

The following indicators are incorporated:

- actual or expected significant adverse changes in business, financial or economic conditions that are expected to cause a significant change to the debtor's ability to meet its obligations;
- actual or expected significant changes in the operating results of the debtor; and
- significant changes in the expected performance and behaviour of the debtor, including changes in the payment status of debtor in the group and changes in the operating results of the debtor.

Regardless of the analysis above, a significant increase in credit risk is presumed if a debtor is more than 30 days past due in making a contractual payment.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(f) Financial instruments (continued)

Financial assets (continued)

(iv) Subsequent measurement - impairment (continued)

Definition of default and credit-impaired financial assets

The Group and the Company define a financial instrument as default, which is fully aligned with the definition of credit-impaired, when it meets one or more of the following criteria:

Quantitative criteria:

The Group and the Company define a financial instrument as default, when the counterparty fails to make contractual payment within 90 days of when they fall due.

Qualitative criteria:

The debtor meets unlikeliness to pay criteria, which indicates the debtor is in significant financial difficulty. The Group and the Company consider the following instances:

- the debtor is in breach of financial covenants;
- it is becoming probable that the debtor will enter bankruptcy or other financial reorganisation; or
- the debtor is insolvent.

Financial instruments that are credit-impaired are assessed on individual basis.

Write-off

- Trade receivables

Trade receivables is written off when there is no reasonable expectation of recovery. Indicators that there is no reasonable expectation of recovery include, amongst others, the failure of a debtor to engage in a repayment plan with the Group and the Company, and a failure to make contractual payments for a period of greater than 365 days past due.

Impairment losses on trade receivables is presented within administrative expenses in the statement of comprehensive income. Subsequent recoveries of amounts previously written off are credited against the same line item.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(f) Financial instruments (continued)

Financial assets (continued)

(iv) Subsequent measurement - impairment (continued)

Write-off (continued)

- Other receivables, amounts due from subsidiaries and amounts due from related parties

The Group and the Company write off financial assets, in whole or in part, when they have exhausted all practical recovery efforts and have concluded there is no reasonable expectation of recovery. The assessment of no reasonable expectation of recovery is based on unavailability of debtor's sources of income or assets to generate sufficient future cash flows to repay the amount. The Group and the Company may write-off financial assets that are still subject to enforcement activity. These are presented within administrative expenses in the statement of comprehensive income. Subsequent recoveries of amounts previously written off will result in impairment gains.

Financial liabilities

(i) Classification and measurement

The Group and the Company classify their financial liabilities in the following categories: at fair value through profit or loss, other financial liabilities and financial guarantee contracts. Management determines the classification of financial liabilities at initial recognition.

Other financial liabilities are non-derivative financial liabilities. Other financial liabilities are initially recognised at fair value plus transaction costs and subsequently carried at amortised cost using the effective interest method. Changes in the carrying value of these liabilities are recognised in profit or loss.

The Group's and the Company's other financial liabilities comprise payables (including amounts due to related parties) and borrowings in the statement of financial position. Financial liabilities are classified as current liabilities, except for maturities greater than 12 months after the reporting date, in which case they are classified as non-current liabilities.

The Group and the Company do not hold any financial guarantee contracts, except for the corporate guarantees disclosed in Note 22 to the financial statements.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(f) Financial instruments (continued)

Financial liabilities (continued)

(ii) Recognition of financial liabilities

Financial liabilities are recognised when the Group and the Company become a party to the contractual provisions of the instrument.

(iii) Derecognition of financial liabilities

Financial liabilities are derecognised when the liability is either discharged, cancelled, has expired or has been restructured with substantially different terms.

(iv) Offsetting of financial assets and financial liabilities

Financial assets and financial liabilities are offset and the net amount reported in the statement of financial position when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously. The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy.

(g) Impairment of non-financial assets

Assets that have an indefinite useful life, for example goodwill or intangible assets not ready to use, are not subject to amortisation and are tested annually for impairment. The Group also assesses goodwill, intangible assets with indefinite useful life and other assets that are subject to amortisation for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognised for the amount by which the carrying amount of the asset exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs of disposal and value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows which are largely independent of the cash inflows from other assets or groups of assets (cash-generating units). Non-financial assets other than goodwill that suffered an impairment are reviewed for possible reversal of the impairment at each reporting date.

The impairment loss is charged to profit or loss unless it reverses a previous revaluation in which case it is charged to the revaluation surplus. Impairment losses on goodwill are not reversed. In respect of other assets, any subsequent increase in recoverable amount is recognised in profit or loss unless it reverses an impairment loss on a revalued asset in which case it is taken to revaluation surplus reserve.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(h) Fair value estimation

The fair value of the financial assets, financial liabilities and derivative financial instruments are estimated for recognition and measurement or for disclosure purposes.

In assessing the fair value of financial instruments, the Group and the Company make certain assumptions and applies the estimated discounted value of future cash flows to determine the fair value of financial instruments. The fair values of financial assets and financial liabilities are estimated by discounting future cash flows at the current interest rate available to the respective companies for similar financial instruments.

The carrying values for financial assets and financial liabilities with a maturity of less than one year are assumed to be approximately equal to their fair values.

(i) Trade and other receivables

Trade receivables are amounts due from customers for goods sold or services performed in the ordinary course of business. Other receivables generally arise from transactions outside the usual operating activities of the Group. If collection is expected in one year or less (or in the normal operating cycle of the business if longer), they are classified as current assets. If not, they are presented as non-current assets.

Trade receivables are recognised initially at the amount of consideration that is unconditional unless they contain significant financing components, where they are recognised at fair value plus transaction costs. Other receivables are recognised initially at fair value plus transaction costs.

After recognition, trade and other receivables are subsequently measured at amortised cost using the effective interest method, less loss allowance. See accounting policy Note 3(f)(iv) on impairment of financial assets.

(j) Cash and cash equivalents

For the purpose of the statement of cash flows, cash equivalents are held for the purpose of meeting short-term cash commitments rather than for investment or other purposes. Cash and cash equivalents comprise cash on hand, deposits held at call with financial institutions, other short term, highly liquid investments with original maturities of 3 months or less that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.

(k) Trade and other payables

Payables, including accruals, represent liabilities for goods received and services rendered to the Group and the Company prior to the end of the financial year and which remain unpaid. Payables are classified as current liabilities if payment is due within one year or less. If not, they are presented as non-current liabilities.

Payables are recognised initially at fair value and subsequently measured at amortised cost using the effective interest method.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(i) Current and deferred income tax

Tax expenses for the period comprise current and deferred tax. The income tax expense or credit for the period is the tax payable on the current period's taxable income based on the applicable income tax rate for each jurisdiction adjusted by changes in deferred tax assets and liabilities attributable to temporary differences and to unused tax losses. Tax is recognised in the profit or loss except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively.

The current income tax charge is calculated on the basis of the tax laws enacted or substantively enacted at the end of the reporting period in the countries where the Group and its associates operate and generate taxable income.

Management periodically evaluates positions taken in tax returns with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provisions where appropriate on the basis of amounts expected to be paid to the tax authorities. This liability is measured using the single best estimate of the most likely outcome.

Deferred tax is recognised in full, using the liability method, on temporary differences arising between the amounts attributed to assets and liabilities for tax purposes and their carrying amounts in the financial statements. However, deferred tax is not accounted for if it arises from initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction affects neither accounting nor taxable profit or loss. Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the period when the asset is realised or the liability is settled taking into consideration of the expiry date of tax incentive, based on the tax rates and tax laws substantially enacted at the balance sheet date.

Deferred tax assets are recognised to the extent that it is probable that future taxable profit will be available against which the deductible temporary differences, investment tax allowance or unused tax losses can be utilised.

Deferred tax assets are recognised on deductible temporary differences arising from investments in subsidiaries, associates and joint arrangements only to the extent that it is probable the temporary difference will reverse in the future and there is sufficient taxable profit available against which the deductible temporary difference can be utilised.

Deferred tax liability is recognised for all taxable temporary differences arising on investments in subsidiaries except where the timing of the reversal of the temporary differences is controlled by the Group and it is probable that the temporary difference will not reverse in the foreseeable future.

Deferred and current tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when the deferred tax assets and liabilities relate to taxes levied by the same taxation authority or either the taxable entity or different taxable entities where there is an intention to settle the balances on a net basis.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(m) Provision for restoration costs

Provisions are recognised when the Group and the Company have a present legal or constructive obligation as a result of past events, when it is probable that an outflow of resources will be required to settle the obligation and when a reliable estimate of the amount can be made.

Provisions are measured at the present value of management's best estimate of the expenditures expected to be required to settle the obligation by discounting the expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and the risks specific to the obligation. The increase in the provision due to passage of time is recognised as finance costs.

Provision for restoration costs is the estimated costs of dismantling and removing the fixtures and effects to restore the rental premises back to its original state and condition.

(n) Employee benefits

(i) Short term employee benefits

Wages, salaries, paid annual leave and sick leave, bonuses and non-monetary benefits that are expected to be settled wholly within 12 months after the end of the period in which the employees render the related service are recognised in respect of employees' services up to the end of the reporting period and are measured at the amounts expected to be paid when the liabilities are settled. The liabilities are presented as payables and accruals in the statement of financial position. The Group and the Company recognise provision where contractually obliged or where there is a past practice that has created a constructive obligation.

(ii) Post-employment pension benefits

The Group and the Company have various post-employment pension benefit schemes in accordance with local conditions and practices in the countries in which the Group and the Company operate. These benefits plans are either defined contribution or defined benefit plans.

A defined contribution plan is a pension plan under which the Group and the Company pay fixed contributions into a separate entity (a fund) on a mandatory, contractual or voluntary basis and the Group and the Company have no legal or constructive obligations to pay further contributions if the fund does not hold sufficient assets to pay all employees benefits relating to employee service in the current and prior periods.

Defined benefit plan is a pension plan that is not a defined contribution plan. Defined benefit plans define an amount of pension benefit that an employee will receive on retirement, usually dependent on one or more factors such as age, years of service and compensation.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(n) Employee benefits (continued)

(ii) Post-employment pension benefits (continued)

Defined contribution plans

The Group's and the Company's contributions to defined contribution plans are recognised in profit or loss in the period to which they relate. Once the contributions have been paid, the Group and the Company have no further payment obligations.

Defined benefit plans

The liability or asset recognised in the statement of financial position in respect of defined benefit pension plans is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of high-quality corporate bonds that are denominated in the currency in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related obligation. In countries where there is no deep market in such bonds, the market rates on government bonds are used.

The current service cost of the defined benefit plan reflects the increase in the defined benefit obligation resulting from employee service in the current year. It is recognised in profit or loss in employee benefit expense, except where included in the cost of an asset.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions are recognised directly in other comprehensive income in the period in which they arise.

The net interest cost is calculated by applying the discount rate to the net balance of the defined benefit obligation and the fair value of plan assets. This cost is included in employee benefit expense in the statements of comprehensive income.

Changes in the present value of the defined benefit obligation resulting from plan amendments or curtailments are recognised immediately in profit or loss as past service costs.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(n) Employee benefits (continued)

(iii) Share-based payment

The Group and the Company operate an equity-settled, share-based compensation plan under which the Company and its subsidiaries receive services from employees as consideration for equity instruments (options) of the Company, pursuant to the Employee Share Option Scheme (“ESOS”). The fair value of the options granted in exchange for the services of the employees are recognised as employee benefit expense over the vesting period with a corresponding increase to share option reserves within equity. The total amount to be expensed is determined by reference to the fair value of the options granted:

- including any market performance conditions (for example, an entity’s share price);
- excluding the impact of any service and non-market performance vesting conditions (for example, profitability, sales growth targets and remaining an employee of the entity over a specified time period); and
- including the impact of any non-vesting conditions (for example, the requirement for employees to save or holding of shares for a specific period of time).

Non-market vesting conditions and service conditions are included in assumptions about the number of options that are expected to vest.

The total expense is recognised over the vesting period, which is the period over which all of the specified vesting conditions are to be satisfied. At the end of the reporting period, the Group revises its estimates of the number of options that are expected to vest based on the non-market vesting conditions and service conditions. It recognises the impact of the revision to original estimates, if any, in profit or loss, with a corresponding adjustment to share option reserve in equity.

In circumstances where employees provide services in advance of the grant date, the grant date fair value is estimated for the purposes of recognising the expense during the period between service commencement period and grant date.

When the options are exercised, the Company issues new shares. The proceeds received net of any directly attributable transaction costs are credited to equity when the options are exercised. When options are not exercised and lapsed, the share option reserve is transferred to retained earnings.

In its separate financial statements of the Company, the grant by the Company of options over its equity instruments to the employees of subsidiary in the Company are treated as a capital contribution to the subsidiary. The fair value of options granted to employees of the subsidiary in exchange for the services of the employees to the subsidiary are recognised as investment in subsidiary, with a corresponding credit to equity of the Company.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(n) Employee benefits (continued)

(iii) Share-based payment (continued)

If an equity-settled award is cancelled, it is treated as if it had vested on the date of cancellation, and any expense not yet recognised for the award is recognised immediately. However, if a new award is substituted for the cancelled award, and designated as a replacement award on the date that it is granted, the cancelled and new award are treated as if they were a modification of the original award.

If an equity award is cancelled by forfeiture, when the vesting conditions (other than market conditions) have not been met, any expense not yet recognised for that award, as at the date of forfeiture, is treated as if it had never been recognised. At the same time, any expense previously recognised on such cancelled equity awards are reversed from the accounts effective as at the date of forfeiture.

Any payment made to employees on the cancellation or settlement of the grant is accounted for as the repurchase of an equity interest, i.e. as a deduction from equity, except to the extent that the payment exceeds the fair value of the equity instruments granted, measured at the repurchase date. Any such excess is recognised as an expense. However, if the share-based payment arrangement included liability components, the Group remeasures the fair value of the liability at the date of cancellation or settlement. Any payment made to settle the liability component is accounted for as an extinguishment of the liability.

The dilutive effect, if any, of outstanding options is reflected as additional share dilution in the computation of earnings per share.

(o) Leases

Accounting by lessee

Leases are recognised as right-of-use ("ROU") asset and a corresponding liability at the date on which the leased asset is available for use by the Group and the Company (i.e. the commencement date).

Contracts may contain both lease and non-lease components. The Group and the Company allocate the consideration in the contract to the lease and non-lease components based on their relative stand-alone prices.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(o) Leases (continued)

Accounting by lessee (continued)

(i) Lease term

In determining the lease term, the Group and the Company consider all facts and circumstances that create an economic incentive to exercise an extension option, or not to exercise a termination option. Extension options (periods after termination options) are only included in the term if the lease is reasonably certain to be extended (or not to be terminated).

The Group and the Company reassess the lease term upon the occurrence of a significant event or change in circumstances that is within the control of the Group and the Company and affects whether the Group and the Company are reasonably certain to exercise an option not previously included in the determination of lease term, or not to exercise an option previously included in the determination of lease term. A revision in lease term results in remeasurement of the lease liabilities. See accounting policy below on reassessment of lease liabilities (refer to (iv) below).

(ii) ROU assets

ROU assets are initially measured at cost comprising the following:

- the amount of the initial measurement of lease liability;
- any lease payments made at or before the commencement date less any lease incentive received;
- any initial direct costs; and
- decommissioning or restoration costs.

ROU assets are subsequently measured at cost, less any accumulated depreciation and impairment loss, if any. The ROU assets are generally depreciated over the shorter of the asset's useful life and the lease term on a straight-line basis. If the Group and the Company are reasonably certain to exercise a purchase option, the ROU asset is depreciated over the underlying asset's useful life. In addition, the ROU assets are adjusted for certain remeasurement of the lease liabilities.

ROU assets are presented as a separate line item in the statement of financial position.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(o) Leases (continued)

Accounting by lessee (continued)

(iii) Lease liabilities

Lease liabilities are initially measured at the present value of the lease payments that are not paid at that date. The lease payments include the following:

- fixed payments (including in-substance fixed payments), less any lease incentive receivable;
- variable lease payments that are based on an index or a rate, initially measured using the index or rate as at the commencement date;
- amounts expected to be payable by the Group and the Company under residual value guarantees;
- the exercise price of a purchase and extension options if the Group and the Company are reasonably certain to exercise that option; and
- payments of penalties for terminating the lease, if the lease term reflects the Group and the Company exercising that option.

Lease payments are discounted using the interest rate implicit in the lease. If that rate cannot be readily determined, which is generally the case for the leases in the Group and the Company, the lessee's incremental borrowing rate is used. This is the rate that the individual lessee would have to pay to borrow the funds necessary to obtain an asset of similar value to the ROU in a similar economic environment with similar term, security and conditions.

Lease payments are allocated between principal and finance cost. The finance cost is charged to profit or loss over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

The Group and the Company present the lease liabilities as a separate line item in the statement of financial position. Interest expense on the lease liability is presented within the finance costs in the statement of comprehensive income.

(iv) Reassessment of lease liabilities

After the commencement date, a lessee shall remeasure the lease liability to reflect changes to the lease payments by using a revised discount rate if either:

- a change in lease term due to the lessee exercises an option (purchase/termination/extension) in a different way than the Group and the Company have previously determined was reasonably certain; or
- a change in lease term due to an event occurs that contractually obliges/prohibits the lessee from exercising the option.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(o) Leases (continued)

Accounting by lessee (continued)

(iv) Reassessment of lease liabilities (continued)

In contrast, a lessee shall use an unchanged discount rate to remeasure lease liability to reflect changes to lease payments if either:

- a change in the amounts expected to be payable under a residual value guarantee; or
- a change in future lease payments resulting from a change in an index or rate used to determine those payments.

A lessee shall recognise the amount of the remeasurement of the lease liability as an adjustment to the ROU. However, if the carrying amount of the ROU is reduced to zero and there is a further reduction in the measurement of the lease liability, a lessee shall recognise any remaining amount of the remeasurement in profit or loss.

(v) Short-term leases and leases of low value assets

Short-term leases are leases with a lease term of 12 months or less. Low-value assets comprise IT equipment and small items of office equipment. Payments associated with short-term leases of equipment and vehicles and all leases of low-value assets are recognised on a straight-line basis as an expense in profit or loss.

(p) Revenue recognition

Revenue from contracts with customers

(i) Provision of services

The Group's revenue arises from a range of products including subscriptions fees for access to the Group's online credit risk management platform, sale of reports, trade referencing and monitoring services, CTOS electronic Know-Your-Customer ("eKYC") services, CTOS Application and Decisioning ("CAD") services, fraud bureau services and portfolio reviews.

The Group recognises revenue when it satisfies a performance obligation by transferring control of a promised product or service to a customer. The Group determines whether goods or services are distinct, and therefore separate performance obligations, when there are multiple promises in a contract.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(p) Revenue recognition (continued)

Revenue from contracts with customers (continued)

(i) Provision of services (continued)

At the inception of the contract, the Group determines the consideration or transaction price that it expects to be entitled in exchange for transferring promised goods or services to the customer, which may include fixed consideration and variable consideration. Variable consideration is included in the transaction price only to the extent that it is highly probable that a significant reversal in the amount of cumulative revenue recognised will not occur when the uncertainty associated with the variable consideration is subsequently resolved. The total consideration is allocated to the performance obligations identified based on their standalone selling price, and is recognised when those performance obligations are satisfied and the control of goods or services is transferred to the customer, either over time or at a point in time.

Credit Reports

Revenue from sales of credit reports is recognised when control of the reports are transferred to the customers.

Revenue from subscription of the Group's monitoring services is from fixed subscription fees. The Group recognises revenue from the fixed subscription fees on a straight-line basis over the subscription period. The subscription can be renewed monthly or annually.

Business Information

Revenue from sales of business information is recognised when control of the information are transferred to the customers.

Revenue from subscription of the Group's online credit risk management platform is from fixed subscription fees. The Group recognises revenue from the fixed subscription fees on a straight-line basis over the subscription period. The subscription can be renewed monthly or annually.

Revenue from trade referencing and monitoring services is from fixed monthly subscription fees, which are recognised over the period in which the services are performed.

Decision Analytics

Revenue from comprehensive portfolio reviews and analytics is recognised when control of the review results or deliverables are transferred to the customers.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(p) Revenue recognition (continued)

Revenue from contracts with customers (continued)

(i) Provision of services (continued)

Decision Analytics (continued)

For CAD contracts that consist of multiple promises such as credit decisioning results and access to the Group's hosted loan management systems, the Group determines that each promise is distinct and are therefore separate performance obligations. These contracts usually comprise fixed and variable considerations. The transaction fees for the credit decisioning results are variable depending on the volume of transactions. Accumulated experience is used to estimate the volume of the verification services using the expected value method. The transaction price is allocated to each performance obligation based on the stand-alone selling prices. Where these are not directly observable, they are estimated based on the expected cost-plus margin. The Group recognises revenue from access to the hosted loan management systems over the service period, while revenue from credit decisioning results is recognised at the point in time when the results are shared with the customers.

For CAD contracts which only comprise credit decisioning results, revenue is recognised when the credit decisioning results are completed and shared with the customers.

Identity and Fraud solutions

Revenue from fraud bureau services is from subscription fees and usage charges which are recognised over the period in which the services are performed and at the point in time when the results are transferred to the customers.

The eKYC services that are provided in a bundled contract comprise multiple promises which may include the sale of software licenses, setup and installation services at the customer's premises, document verification, facial recognition, bureau file verification, knowledge-based authentication services (collectively "verification services") and maintenance and technical services. The Group accounts for each service in the bundled contract as separate performance obligations as the services are not inputs to a combined item that the customer has contracted to receive. The Group can fulfil its promise to transfer each of the goods or services separately and does not provide any significant integration, modification, or customisation services.

For each of the verification services, revenue is recognised at the point in time when the verification services are completed and the results are shared with the customer. Bundled contracts usually comprise fixed and variable considerations. The transaction fees for the verification services are variable depending on the volume of transactions. Accumulated experience is used to estimate the volume of the verification services using the expected value method. The transaction price is allocated to each performance obligation based on the stand-alone selling prices. Where these are not directly observable, they are estimated based on the expected cost-plus margin.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(p) Revenue recognition (continued)

Revenue from contracts with customers (continued)

(i) Provision of services (continued)

Identity and Fraud solutions (continued)

The Group recognises revenue from the sale of software license at the point in time when control of the software license has been transferred to the customer.

When another party is involved in providing the software licenses to the customer, the Group is a principal as it controls the software licenses before they are transferred to the customers. As the principal, the Group recognises as revenue on the gross consideration allocated to the software licenses with the corresponding direct costs of satisfying the contract.

The Group recognises revenue from installation services over time as and when the installation progresses. Revenue in respect of maintenance and technical services are recognised over the period the maintenance and technical services are performed.

(ii) Contract liabilities

Contract liability is the unsatisfied obligation by the Group to transfer goods or services to customer for which the Group has received the consideration in advance or has billed the customer.

(iii) Management fees

Fees from management services are recognised as revenue at the point the services are rendered.

Revenue from other sources

(i) Interest income

Interest income is recognised on a time proportion basis, taking into account the principal outstanding and the effective interest rate over the period to maturity, when it is determined that such income will accrue to the Group and the Company.

(ii) Dividend income

Dividend income is recognised when the Company's right to receive payment is established.

(q) Incremental costs incurred to obtain or fulfil a contract

The Group has elected the practical expedient by recognising the costs incurred to obtain a contract as an expense where the costs incurred to obtain a contract are in respect of contracts with amortisation period of less than one year.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(r) Share capital

(i) Classification

Ordinary shares are classified as equity. Other shares are classified as equity and/or liability according to the substance of the contractual arrangement of the particular instrument.

(ii) Share issue costs

Incremental costs directly attributable to the issue of new shares or options are deducted against equity.

(iii) Dividends to shareholders of the Group

Liability is recognised for the amount of any dividend declared, being appropriately authorised and no longer at the discretion of the Group, on or before the end of the reporting period but not distributed at the end of the reporting period.

Distributions to holders of an equity instrument is recognised directly in equity.

(iv) Purchase of own shares

Where the Company purchases its own ordinary shares as a result of a share buy-back, the consideration paid, including any directly attributable incremental costs, net of tax, is deducted from the equity attributable to the owners of the Company as treasury shares until the shares are cancelled or reissued. Where such treasury shares are subsequently sold or reissued, the cost of treasury shares is reversed from the treasury shares account and the realised gain or loss on disposal or reissuance, net of any directly attributable incremental transaction costs, is recognised in the capital reserve account. Where such treasury shares are subsequently cancelled, the cost of treasury shares is deducted against the share capital and the retained earnings of the Company.

(s) Borrowings

Borrowings are initially recognised at fair value, net of transaction costs incurred. Borrowings are subsequently carried at amortised cost. Any difference between initial recognised amount and the redemption amount is recognised in profit or loss over the period of the borrowings using the effective interest method.

Borrowing costs that are directly attributable to the acquisition, construction or production of qualifying assets are capitalised as part of the cost of the assets. Other borrowing costs are recognised in profit or loss in the period in which they are incurred.

Fees paid on the establishment of loan facilities are recognised as transaction costs of the loan to the extent that it is probable that some or all of the facility will be drawn down. In this case, the fee is deferred until the drawdown occurs. To the extent there is no evidence that it is probable that some or all of the facility will be drawn down, the fee is capitalised as a prepayment for liquidity services and amortised over the period of the facility to which it relates.

Borrowings are removed from the statement of financial position when the obligation specified in the contract is discharged, cancelled or expired. The difference between the carrying amount of a financial liability that has been extinguished or transferred to another party and the consideration paid, including any non-cash assets transferred or liabilities assumed, is recognised in profit or loss within finance costs.

Interest expense, losses and gains relating to a financial instrument, or a component part, classified as a liability is reported within finance costs in the statement of comprehensive income.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(s) Borrowings (continued)

Borrowings are classified as current liabilities unless the Group and the Company have an unconditional right to defer settlement of the liability for at least 12 months after the end of the reporting period.

(t) Earnings per share

(i) Basic earnings per share

Basic earnings per share is calculated by dividing:

- the profit attributable to owners of the Group, excluding any costs of servicing equity other than ordinary shares; and
- by the weighted average number of ordinary shares outstanding during the financial year, adjusted for bonus elements in ordinary shares issued during the year and excluding treasury shares.

(ii) Diluted earnings per share

Diluted earnings per share adjusts the figures in the determination of basic earnings per share to take into account:

- the after income tax effect of interest and other financing costs associated with dilutive potential ordinary shares, and
- the weighted average number of additional ordinary shares that would have been outstanding assuming the conversion of all dilutive potential ordinary shares.

(u) Segment reporting

Operating segments are reported in a manner consistent with the internal reporting provided to the chief operating decision-makers. The chief operating decision-makers, who are responsible for allocating resources and assessing performance of the operating segments, have been identified as the Group Chief Executive Officer, Group Chief Financial Officer, Chief Executive Officer and Chief Operating Officer of the respective subsidiaries.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (CONTINUED)

(v) Administrative expenses

The nature of expenses classified within administrative expenses are those which are not directly attributable to revenue generating activities of the Group but are part of the Group's overall operating activities. The expenses classified within administrative expenses includes staff cost other than staff cost for sales and marketing employees, depreciation expenses of property, plant and equipment and ROU assets, IT support expenses, professional fees and foreign exchange gain or loss amongst others.

(w) Contingent assets and liabilities

The Group does not recognise contingent assets and liabilities other than those arising from business combinations, but discloses its existence in the financial statements. A contingent liability is a possible obligation that arises from past events whose existence will be confirmed by the occurrence or nonoccurrence of one or more uncertain future events beyond the control of the Group or a present obligation that is not recognised because it is not probable that an outflow of resources will be required to settle the obligation. A contingent liability also arises in the extremely rare case where there is a liability that cannot be recognised because it cannot be measured reliably. However, contingent liabilities do not include financial guarantee contracts. A contingent asset is a possible asset that arises from past events whose existence will be confirmed by the occurrence or non-occurrence of one or more uncertain future events beyond the control of the Group. The Group does not recognise contingent assets but discloses its existence where inflows of economic benefits are probable, but not virtually certain.

(x) Discontinued operations

A discontinued operation is a component of the entity that has been disposed of or is classified as held for sale and that represents a separate major line of business or geographical area of operations, is part of a single coordinated plan to dispose of such a line of business or area of operations, or is a subsidiary acquired exclusively with a view to resale. The results of discontinued operations are presented separately in the statement of comprehensive income.

4. CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS

Estimates and judgements are continually evaluated by the Directors and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances.

The Group and the Company make estimates and assumptions concerning the future. The resulting accounting estimates will, by definition, rarely equal the related actual results. To enhance the information content of the estimates, certain key variables that are anticipated to have material impact on the Group's and the Company's results and financial position are tested for sensitivity to changes in the underlying parameters. The estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are outlined below.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

4. CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS (CONTINUED)

(a) Revenue recognition for contracts with customers

Identification of performance obligations ("PO")

For the various models of the eKYC contracts and certain types of CAD contracts, they are considered to be bundled solutions that consist of multiple products and services promised to the customers. The Group accounts for individual products and services separately as separate performance obligations if they are distinct promised products and services, i.e. if a product or service is separately identifiable from other items in the bundled solution and if a customer can benefit from it separately. The Group exercises judgements in determining whether the products and services are considered distinct and are separate performance obligations for the eKYC and CAD revenue contracts. This determination will affect the allocation of consideration in the contract and revenue recognised for each performance obligation.

The Group recognises the revenue at a point in time or over time depending on when the control over the provision of services are transferred to the customers. The Group also exercises judgement on the timing when the control is transferred to determine the timing of recognition.

Determining stand-alone selling price ("SSP")

The Group has exercised judgement in estimating the SSP of each PO in the eKYC and CAD revenue contracts, given that the SSPs for products and services are not directly observable in the market. The Group has used a cost plus margin approach, by incorporating the expected cost of satisfying a PO and an appropriate margin for the particular product or service.

Determining transaction price

The Group has determined that the volume of transactions that are highly probable for each revenue contract as the basis to estimate the variable volume in determining the variable consideration it will be entitled to from respective contracts. The estimates of variable consideration should be updated at the end of each reporting period and any changes are accounted for as a change in estimates (adjustments to revenue) in the period in which the transaction price changes.

(b) Contingent liabilities in relation to the Group's litigation and claims

In the normal course of business, there are contingent liabilities arising from legal recourse sought on the Group's credit reporting operations. The accounting treatment of these litigation cases is based on the Group's view of the expected outcome of these contingencies, which the Group makes estimates and judgements concerning these future events. The expected outcomes of these litigation cases are assessed in consultation with the Group's external legal counsel, which will be reviewed at each reporting date. The Directors have assessed these litigation cases as possible obligations where outflow of resources are not probable in accordance with MFRS 137 'Provisions, Contingent Liabilities and Contingent Assets'. The contingent liabilities in relation to the Group's litigation and claims as at the reporting date are disclosed in Note 30(b) to the financial statements.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

4. CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS (CONTINUED)

(c) Intangible assets – Goodwill

The Group tests goodwill for impairment annually in accordance with its accounting policy or more frequently if events or change in circumstances indicate that this is necessary within the financial year. Recoverable amount is measured at the higher of the fair value less costs to sell and value in use. These calculations require the use of estimates. The calculations are inherently judgemental and susceptible to change from period to period because they require the Group to make assumptions about revenue growth rate, earnings before interest, taxes, depreciation and amortisation (“EBITDA”) margin, discount rate and terminal growth rate.

No impairment charge was recognised as the recoverable amount exceeded its carrying amount. The assumptions used in the impairment assessment of goodwill are disclosed in Note 13.

(d) Carrying amount of investments in associates

The Group determines at each reporting date whether there is any objective evidence that the investment in the associate is impaired in accordance with its accounting policy. Recoverable amount is measured at the higher of the fair value less costs to sell and value in use. These calculations require the use of estimates. The calculations are inherently judgemental and susceptible to change from period to period because they require the Group to make assumptions about revenue growth rate, earnings before interest, taxes, depreciation and amortisation (“EBITDA”) margin, discount rate and terminal growth rate.

No impairment charge was recognised as the recoverable amount exceeded its carrying amount. The assumptions used in the impairment assessment of investments in associates are disclosed in Note 15.

FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)

5. REVENUE

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Provision of services:	(a)				
- credit reports		75,347	70,557	-	-
- business information		100,707	105,691	-	-
- decision analytics		135,298	112,691	-	-
- identity and fraud solutions		14,709	15,911	-	-
- management fees		-	-	5,324	3,618
- dividend income from subsidiaries and associates		-	-	128,781	93,779
		326,061	304,850	134,105	97,397

The comparative amounts relating to revenue for the Group which was previously classified under digital reports, subscriptions and monitoring services, comprehensive portfolio review and analytics and digital solutions has been reclassified to credit reports, business information, decision analytics and identity and fraud solutions to conform to the current financial year's presentation.

(a) Revenue from contracts with customers

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Timing of revenue recognition:				
- at a point in time	223,552	200,843	5,324	3,618
- over time	102,509	104,007	-	-
Revenue from contracts with customers	326,061	304,850	5,324	3,618

The Group serves three distinct types of customers, namely Key Accounts, Commercial and Direct-to-Consumer. Key Accounts customers comprise of the Group's highest revenue-generating customers as well as other selected customers, such as those with complex requirements or well-recognised brands. Commercial customers comprise (i) the Group's Malaysian segment commercial customers other than Key Accounts customers and (ii) all of CTOS Basis Sdn. Bhd.'s, a wholly owned subsidiary of the Company, customers which are all commercial customers. Direct-to-Consumer comprise the Group's retail consumers.

The disaggregation of revenue by types of customers are as follows:

	Group	
	2025 RM'000	2024 RM'000
Type of customers:		
- Key Accounts (Malaysia)	116,857	111,136
- Key Accounts (International)	46,106	39,246
- Commercial	125,241	127,963
- Direct-to-Consumer	37,857	26,505
Total	326,061	304,850

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

5. REVENUE (CONTINUED)

(a) Revenue from contracts with customers (continued)

The disaggregation of revenue by geographical are as follows:

	Group	
	2025 RM'000	2024 RM'000
Malaysia	279,955	265,604
International	46,106	39,246
Total	326,061	304,850

(b) Contract liabilities related to contracts with customers

The Group has recognised the following contract liabilities related to contracts with customers:

	Note	Group	
		2025 RM'000	2024 RM'000
Contract liabilities	(i),(iii)	13,471	7,805

(i) Significant changes in contract liabilities

	Note	Group	
		2025 RM'000	2024 RM'000
<u>Contract liabilities</u>			
At 1 January		7,805	7,502
Revenue recognised that was included in the contract liability balance at the beginning of the financial year		(7,805)	(7,502)
Increases due to cash received, excluding amounts recognised as revenue during the financial year		13,471	7,805
At 31 December		13,471	7,805

(ii) Asset recognised from costs to obtain or fulfil a contract

The Group has elected the practical expedient to recognise contract cost incurred related to contracts with an amortisation period of less than one year as an expense when incurred.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**5. REVENUE (CONTINUED)**(b) Contract liabilities related to contracts with customers (continued)(iii) Unsatisfied performance obligations

As of 31 December 2025, the aggregate amount of the transaction price allocated to the remaining performance obligations for eKYC and CAD contracts amounts to RM2.8 million (2024: RM4.2 million) and the Group will recognise this revenue as and when the services are performed, which is expected to occur over the next 12 to 60 months (2024: 12 to 60 months).

The Group expects that the transaction price of RM0.6 million (2024: RM1.4 million) allocated to unsatisfied performance obligations as of 31 December 2025 will be recognised as revenue within the next 12 months. The remaining allocated transaction price of RM2.2 million (2024: RM2.8 million) will be recognised over the next 12 to 60 months (2024: 12 to 60 months).

The Group applied the practical expedient in MFRS 15 for all other contracts with periods of one year or less and the unsatisfied performance obligations for these contracts are not disclosed.

6. FINANCE INCOME AND FINANCE COSTS

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Finance income</u>					
Interest income		303	203	121	63
Fair value gain on other investments		-	2	-	2
		303	205	121	65

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Finance costs</u>					
Interest expense on:					
- bank borrowings		8,393	8,800	6,494	7,882
- lease liabilities		1,100	1,097	17	1
Accretion of provision for restoration costs	23	74	78	-	-
		9,567	9,975	6,511	7,883

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

7. PROFIT BEFORE TAX

The following items have been charged/(credited) in arriving at the profit before tax:

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Allowance for impairment of receivables - net	27(c)	1,118	938	-	-
Auditors' remuneration					
- fees for statutory audit to PricewaterhouseCoopers PLT		466	390	226	165
- fees for audit related services ⁽¹⁾		9	44	-	35
- fees for other services ⁽²⁾		355	96	10	10
- fees for statutory audit to other auditors		56	56	50	50
Depreciation of property, plant and equipment	11	3,443	3,656	4	5
Depreciation of right-of-use assets	12	2,667	3,476	41	42
Amortisation of intangible assets	13	8,345	9,282	-	-
Impairment of intangible assets - computer software	13	2,733	-	-	-
Search charges and data fees		74,960	64,028	-	-
Advertising, promotion and sales commission expenses		14,730	12,360	213	268
IT costs		16,566	11,913	1	2
Legal and professional fees		6,000	6,395	941	760
Rental of buildings		919	642	14	-
Realised (gain)/loss on foreign exchange		(44)	121	1	(1)
Unrealised loss on foreign exchange		416	61	96	3
Bad debts recovered		(5)	(4)	-	-
Staff cost (including Directors' remuneration)	9	88,247	78,185	4,981	3,777
Gain on disposal of investment in associate	15(a)	(17,903)	-	-	-
Interest income	6	(303)	(203)	(121)	(63)

Notes:

⁽¹⁾ Fees incurred mainly in connection with agreed-upon procedures and review of ESOS paid or payable to PricewaterhouseCoopers PLT (LLP0014401-LCA & AF 1146) and member firms of PricewaterhouseCoopers PLT.

⁽²⁾ Fees incurred for assisting the Group in connection with tax compliance services and tax advisory services paid or payable to member firms of PricewaterhouseCoopers PLT.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**8. DIRECTORS' REMUNERATION**

The Directors of the Company in office during the financial year are as follows:

Dato' Noorazman bin Abd Aziz
Lynette Yeow Su-Yin
Nirmala A/P Doraisamy
Su Puay Leng
Ankur Sehgal (appointed on 31 March 2026)
Mizran Bin Md Nahar (appointed on 31 March 2026)*
Erick Hamburger Barraza (resigned on 1 May 2025)
Loh Kok Leong (resigned on 31 March 2026)

* Ceased as alternate director to Loh Kok Leong and appointed as director on 31 March 2026.

The aggregate amount of emoluments received/receivable by the Directors of the Company during the financial year are as follows:

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Fees	448	413	448	413
Wages, salaries and bonuses	3,187	4,362	-	-
	3,635	4,775	448	413

There was no benefit-in-kind provided to Directors of the Company during the financial year.

9. STAFF COST (INCLUDING DIRECTORS' REMUNERATION)

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Fees	448	413	448	413
Wages, salaries and bonuses	78,707	70,021	3,998	3,000
Defined contribution plan	9,092	7,751	535	364
	88,247	78,185	4,981	3,777

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

10. TAX EXPENSE

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Continuing operations</u>					
Current tax:					
- current year		7,007	8,010	241	94
- over accruals in prior years		(3,413)	(8)	62	(12)
		3,594	8,002	303	82
Deferred tax:					
- origination and reversal of temporary differences	16	4,341	(1,444)	-	-
Tax expense		7,935	6,558	303	82

The Company's subsidiary, CDS is entitled to pioneer status incentives under the Promotion of Investments Act ("PIA") 1986 for MSC Malaysia Qualifying Activities. As a result, certain CDS's profits are exempted from tax for a period of 10 years, beginning on 9 November 2016. However, based on the provisions of the PIA 1986, the incentive's effective period is only for the first 5 years. The tax relief period under CDS's MSC Pioneer Certificate is from 9 November 2016 to 8 November 2021. On 26 October 2023, CDS has received the approval from the Ministry of Finance via Malaysia Digital Economy Corporation on the extension of the second 5-year income tax exemption for the period from 9 November 2021 to 8 November 2026.

Tax expenses for the taxation authorities in Indonesia and the Philippines are calculated at the rates prevailing in those jurisdictions.

The explanation of the relationship between the tax expenses and profit before tax as follows:

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Profit before tax</u>				
- continuing operations	89,891	108,634	117,953	82,162
- discontinued operations	22,443	3,820	-	-
	112,334	112,454	117,953	82,162
Tax expense at statutory tax rate of 24%	26,960	26,989	28,309	19,718
Tax expense at effective tax rate	7,935	6,558	303	82
Effective tax rate	7%	6%	0%	0%



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

10. TAX EXPENSE (CONTINUED)

	Group		Company	
	2025 %	2024 %	2025 %	2024 %
<u>Numerical reconciliation between the Malaysian tax rate and effective tax rate</u>				
Malaysian tax rate:	24	24	24	24
Tax effects of:				
- pioneer status tax exemption	(13)	(17)	-	-
- income not subject to tax	-	-	(26)	(27)
- expenses not deductible for tax purposes	8	6	2	3
- share of profits of associates	(8)	(7)	-	-
- recognition of previously unrecognised temporary differences	3	-	-	-
- effect of income taxed under capital gains tax	(4)	-	-	-
- over accruals in prior years	(3)	-	-	-
Effective tax rate	7	6	-	-

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

11. PROPERTY, PLANT AND EQUIPMENT

Group	Computers RM'000	Office equipment RM'000	Renovation RM'000	Furniture and fittings RM'000	Work in progress RM'000	Total RM'000
<u>2025</u>						
Cost						
At 1 January	35,121	353	3,780	64	481	39,799
Additions	806	64	1,046	18	-	1,934
Write-offs	(350)	(23)	(226)	-	-	(599)
Currency translation differences	(1)	(23)	-	-	-	(24)
At 31 December	35,576	371	4,600	82	481	41,110
Accumulated depreciation						
At 1 January	28,554	182	970	42	-	29,748
Charged during the financial year	2,824	74	539	6	-	3,443
Write-offs	(349)	(22)	(223)	-	-	(594)
Currency translation differences	(3)	(11)	-	-	-	(14)
At 31 December	31,026	223	1,286	48	-	32,583
Net book value	4,550	148	3,314	34	481	8,527

FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

11. PROPERTY, PLANT AND EQUIPMENT (CONTINUED)

Group	Computers RM'000	Office equipment RM'000	Renovation RM'000	Furniture and fittings RM'000	Work in progress RM'000	Total RM'000
<u>2024</u>						
<u>Cost</u>						
At 1 January	32,698	674	5,172	55	1,087	39,686
Additions	1,819	170	3,086	16	-	5,091
Write-offs	-	(486)	(4,478)	(7)	-	(4,971)
Reclassifications	606	-	-	-	(606)	-
Currency translation differences	(2)	(5)	-	-	-	(7)
At 31 December	35,121	353	3,780	64	481	39,799
<u>Accumulated depreciation</u>						
At 1 January	25,337	579	5,073	41	-	31,030
Charged during the financial year	3,217	80	353	6	-	3,656
Write-offs	-	(474)	(4,456)	(5)	-	(4,935)
Currency translation differences	-	(3)	-	-	-	(3)
At 31 December	28,554	182	970	42	-	29,748
Net book value	6,567	171	2,810	22	481	10,051

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

11. PROPERTY, PLANT AND EQUIPMENT (CONTINUED)

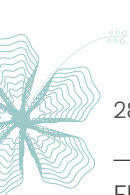
	Company		
	Cost RM'000	Accumulated depreciation RM'000	Net book value RM'000
<u>Computers</u>			
At 1 January 2025	37	(26)	11
Charged during the financial year	-	(4)	(4)
At 31 December 2025	37	(30)	7
At 1 January 2024	27	(21)	6
Additions	10	-	10
Charged during the financial year	-	(5)	(5)
At 31 December 2024	37	(26)	11

12. LEASES

- (i) The statements of financial position show the following amounts relating to leases:

Right-of-use assets

Buildings	Note	Group		
		Cost RM'000	Accumulated depreciation RM'000	Net book value RM'000
At 1 January 2025		24,357	(2,489)	21,868
Additions		178	-	178
Derecognition		(257)	210	(47)
Charged during the financial year	7	-	(2,667)	(2,667)
At 31 December 2025		24,278	(4,946)	19,332
At 1 January 2024		4,900	(3,466)	1,434
Additions		24,100	-	24,100
Derecognition		(4,643)	4,453	(190)
Charged during the financial year	7	-	(3,476)	(3,476)
At 31 December 2024		24,357	(2,489)	21,868



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

12. LEASES (CONTINUED)

- (i) The statement of financial position shows the following amounts relating to leases (continued):

Right-of-use assets (continued)

Buildings	Note	Company		
		Cost RM'000	Accumulated depreciation RM'000	Net book value RM'000
At 1 January 2025		-	-	-
Additions		345	-	345
Charged during the financial year	7	-	(41)	(41)
At 31 December 2025		345	(41)	304
At 1 January 2024		217	(156)	61
Charged during the financial year	7	-	(42)	(42)
Derecognition		(217)	198	(19)
At 31 December 2024		-	-	-

Lease liabilities

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Current	1,478	1,801	34	-
Non-current	18,562	20,280	278	-
As at 31 December	20,040	22,081	312	-

- (ii) Nature of the lessee's leasing activities and restrictions or covenants imposed by leases

The Group and the Company lease various office spaces. Rental contracts are typically made for periods of 1 to 9 years and may have extension options.

Lease terms are negotiated on an individual basis and contain a wide range of different terms and conditions.

The lease agreements do not impose any covenants, but leased assets may not be used as security for borrowings.

- (iii) Variable payments terms

The Group and the Company do not have any variable payment terms on their lease agreements.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

12. LEASES (CONTINUED)

(iv) Extension options and termination options

Extension and termination options are included in lease contracts across the Group and the Company. Extension and termination options are included, when possible, to provide greater flexibility. The majority of extension and termination options held are exercisable only by the Group and not by the respective lessors.

In cases in which the Group and the Company are not reasonably certain to exercise an optional extended lease term, payments associated with the optional period are not included within lease liabilities. As at 31 December 2025 and 31 December 2024, the Group and the Company did not exercise any extension option, therefore no financial effect is recognised in the lease liabilities.

Potential future rental payments to periods following the exercise date of extension options are summarised below.

	Potential future lease payments not included in lease liabilities (undiscounted)			
	Within 1 year RM'000	Between 1 and 5 years RM'000	More than 5 years RM'000	Total RM'000
<u>At 31 December 2025</u>				
<u>Group</u>				
Office space	3	235	10,324	10,562

	Within 1 year RM'000	Between 1 and 5 years RM'000	More than 5 years RM'000	Total RM'000
	<u>At 31 December 2024</u>			
<u>Group</u>				
Office space	-	72	10,324	10,396

(v) Movement in lease liabilities arising from financing activities as follows:

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
At 1 January	22,081	1,493	-	63
Repayment of lease liabilities	(3,268)	(3,490)	(50)	(45)
Additions	178	23,000	345	-
Derecognition	(51)	(19)	-	(19)
Non-cash changes:				
- interest expense (Note 6)	1,100	1,097	17	1
At 31 December	20,040	22,081	312	-

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NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)

13. INTANGIBLE ASSETS

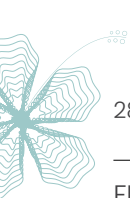
Group	Goodwill RM'000	Database and customer relationships RM'000	License fee RM'000	Computer software – Completed RM'000	Computer software – Work in progress RM'000	Total RM'000
<u>2025</u>						
At 1 January	105,801	12,032	-	24,860	15,094	157,787
Additions	-	3,857	-	2,373	6,154	12,384
Write-offs	-	-	-	-	(45)	(45)
Amortisation charge for the financial year	-	(3,320)	-	(5,025)	-	(8,345)
Impairment loss for the financial year	-	-	-	-	(2,733)	(2,733)
Reclassifications	-	-	-	9,893	(9,893)	-
Currency translation differences	(2,879)	-	-	(7)	-	(2,886)
At 31 December	102,922	12,569	-	32,094	8,577	156,162
Cost	107,677	24,254	1,443	47,419	11,310	192,103
Accumulated amortisation	-	(11,685)	(1,443)	(15,256)	-	(28,384)
Accumulated impairment losses	-	-	-	-	(2,733)	(2,733)
Currency translation differences	(4,755)	-	-	(69)	-	(4,824)
At 31 December	102,922	12,569	-	32,094	8,577	156,162

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

13. INTANGIBLE ASSETS (CONTINUED)

Group	Goodwill RM'000	Database and customer relationships RM'000	License fee RM'000	Computer software - Completed RM'000	Computer software - Work in progress RM'000	Total RM'000
2024						
At 1 January	106,654	7,463	-	7,285	12,379	133,781
Additions	-	7,443	-	6,173	20,571	34,187
Amortisation charge for the financial year	-	(2,874)	-	(6,408)	-	(9,282)
Reclassifications	-	-	-	17,856	(17,856)	-
Currency translation differences	(853)	-	-	(46)	-	(899)
At 31 December	105,801	12,032	-	24,860	15,094	157,787
Cost	107,677	20,397	1,443	35,153	15,094	179,764
Accumulated amortisation	-	(8,365)	(1,443)	(10,231)	-	(20,039)
Currency translation differences	(1,876)	-	-	(62)	-	(1,938)
At 31 December	105,801	12,032	-	24,860	15,094	157,787



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NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

13. INTANGIBLE ASSETS (CONTINUED)

Following a review of the expected period of economic benefits, the Group extended the useful lives of certain computer software from 5 years to 7 years during the current financial year. The amortisation expense for the current financial year decreased by RM2.2 million and the impact on future periods is expected to result in a corresponding reduction in annual amortisation expense over the remaining useful lives of the assets.

Impairment testing for cash-generating units ("CGU") containing goodwill

For the purpose of impairment testing, the carrying amount of goodwill is allocated to CGUs identified at the operating segments.

The recoverable amount of a CGU is determined based on value in use calculations. These calculations use pre-tax cash flow projections based on internally approved financial forecasts covering five years period which reflect management's expectations of revenue and EBITDA based on past experience and future expectations of business performance. The calculation of the value-in-use has been probability-weighted on 3 possible outcomes, which takes into account the possible variations in the amount and timing of the future cashflows.

A segment-level summary of the Group's net book value of goodwill allocation is as follows:

	Group	
	2025 RM'000	2024 RM'000
Malaysia – Malaysian subsidiaries excluding CTOS Basis Sdn. Bhd., Enfo Sdn. Bhd. and CTOS Insights Sdn. Bhd.	37,906	37,906
Malaysia – CTOS Basis Sdn. Bhd.	36,736	36,736
International – Indonesia	1,816	2,001
International – The Philippines	26,464	29,158
	102,922	105,801

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

13. INTANGIBLE ASSETS (CONTINUED)

Impairment testing for cash-generating units ("CGU") containing goodwill (continued)

The key assumptions used in the value-in-use calculations are as follows:

Malaysia – Malaysian subsidiaries excluding CTOS Basis Sdn. Bhd., Enfo Sdn. Bhd. and CTOS Insights Sdn. Bhd.

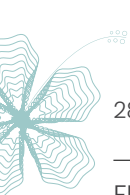
For the financial year ended 31 December 2025

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	8%	10%	5%
(Year 2 - 5)	8%	10%	5%
EBITDA margin (Year 1)	30%	32%	27%
(Year 2 - 5)	31%-33%	33%-36%	27%-29%
Pre-tax discount rate	12.6%	12.5%	12.8%
Terminal growth rate		2.5%	

For the financial year ended 31 December 2024

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	10%	10%	10%
(Year 2 - 5)	10%	15%	5%
EBITDA margin (Year 1)	34%	36%	29%
(Year 2 - 5)	34%-36%	36%-38%	29%-30%
Pre-tax discount rate	12.2%	12.2%	12.4%
Terminal growth rate		2.5%	

There is no reasonably possible change in a key assumption on which management has based the determination of the CGU's recoverable amount that would cause the CGU's carrying amount to exceed its recoverable amount.



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NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**13. INTANGIBLE ASSETS (CONTINUED)**

Impairment testing for cash-generating units ("CGU") containing goodwill (continued)

The key assumptions used in the value in use calculations are as follows (continued):

Malaysia – CTOS Basis Sdn. Bhd.

For the financial year ended 31 December 2025

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	10%	15%	5%
(Year 2 - 5)	10%	15%	5%
EBITDA margin (Year 1)	44%	50%	40%
(Year 2 - 5)	44%	50%	40%
Pre-tax discount rate	11.8%	12.0%	11.5%
Terminal growth rate		2.5%	

For the financial year ended 31 December 2024

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	23%	30%	10%
(Year 2 - 5)	10%	20%	10%
EBITDA margin (Year 1)	57%	57%	56%
(Year 2 - 5)	57%	56%-57%	55%-56%
Pre-tax discount rate		12.5%	
Terminal growth rate		2.5%	

There is no reasonably possible change in a key assumption on which management has based the determination of the CGU's recoverable amount that would cause the CGU's carrying amount to exceed its recoverable amount.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

13. INTANGIBLE ASSETS (CONTINUED)

Impairment testing for cash-generating units ("CGU") containing goodwill (continued)

The key assumptions used in the value in use calculations are as follows (continued):

International – Indonesia

For the financial year ended 31 December 2025

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	41%	102%	6%
(Year 2 - 5)	6%	10%	6%
EBITDA margin (Year 1)	5%	5%	0%
(Year 2 - 5)	5%	5%	0%
Pre-tax discount rate		10.0%	
Terminal growth rate		2.5%	

For the financial year ended 31 December 2024

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	103%	103%	68%
(Year 2 - 5)	10%	10%-20%	5%
EBITDA margin (Year 1)	0%	0%	0%
(Year 2 - 5)	5%	5%-8%	0%-5%
Pre-tax discount rate		10.0%	
Terminal growth rate		2.5%	

The most sensitive assumptions in the value-in-use calculations are revenue growth rate and EBITDA margin. A 5% decrease in revenue growth rate and 2% decrease in EBITDA margin (2024: 5% decrease in revenue growth rate and 1% decrease in EBITDA margin) for the financial years 2026 to 2030 (2024: 2025 to 2029) in Scenario 1, with all other inputs remain constant, would result in the carrying amount exceeding its recoverable amount by RM1.0 million (2024: RM0.5 million).

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NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**13. INTANGIBLE ASSETS (CONTINUED)**

Impairment testing for cash-generating units ("CGU") containing goodwill (continued)

The key assumptions used in the value in use calculations are as follows (continued):

International – The Philippines

For the financial year ended 31 December 2025

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	20%	25%	10%
(Year 2 - 5)	20%	25%	10%
EBITDA margin (Year 1)	23%	25%	20%
(Year 2 - 5)	23%	25%	20%
Pre-tax discount rate		11.2%	
Terminal growth rate		2.5%	

For the financial year ended 31 December 2024

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	30%	30%	30%
(Year 2 - 5)	10%-18%	10%-28%	10%
EBITDA margin (Year 1)	19%	19%	6%
(Year 2 - 5)	19%	19%	6%
Pre-tax discount rate		10.2%	
Terminal growth rate		2.5%	

There is no reasonably possible change in a key assumption on which management has based the determination of the CGU's recoverable amount that would cause the CGU's carrying amount to exceed its recoverable amount.

14. INVESTMENTS IN SUBSIDIARIES

	Company	
	2025 RM'000	2024 RM'000
Unquoted shares, at cost	366,936	366,936
Fair value of share options granted, over the Company's equity instruments for employees of subsidiaries	6,862	6,772
	373,798	373,708

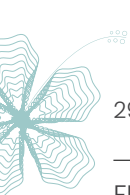
NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

14. INVESTMENTS IN SUBSIDIARIES (CONTINUED)

The information on the subsidiaries are as follows:

Name	Principal activities	Group's effective interest	
		2025	2024
<u>Incorporated in Malaysia</u>			
CTOS Data Systems Sdn. Bhd. ("CDS") ¹	Credit reporting agency and other digital software related services	100%	100%
CTOS Business Systems Sdn. Bhd. ("CBS") ¹	Software developer and other related services	100%	100%
Automated Mail Responder Sdn. Bhd. ("AMR") ¹	Dormant	100%	100%
CTOS IDS Sdn. Bhd. ("IDS") ¹	Outsourcing and training services	100%	100%
Enfo Sdn. Bhd. ("Enfo") ²	Investment holding	100%	100%
CTOS Insights Sdn. Bhd. ("CTOS Insights") ²	Investment holding	100%	100%
CTOS Basis Sdn. Bhd. ("CTOS Basis") ¹	Credit reporting service, business information service, credit bureau, marketing list, market research, industry studies and related consultation services	100%	100%
<u>Incorporated in Singapore</u>			
Alt Decisions Pte. Ltd. ("Alt Decisions") ³	Investment holding	80%	80%
Fintech Platform Ventures Pte. Ltd. ("Fintech") ³	Investment holding	100%	100%
Subsidiary held through Fintech Platform Ventures Pte Ltd			
CTOS Basis Pte. Ltd. ³	Provision of data analytics, processing and related activities	100%	100%
<u>Incorporated in Indonesia</u>			
Subsidiary held through Alt Decisions Pte. Ltd.			
PT Prime Analytics Indonesia ("Prime Analytics") ²	Provision of credit scoring and risk-based intelligence information from alternative data assets	79.99%	79.99%



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NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**14. INVESTMENTS IN SUBSIDIARIES (CONTINUED)**

The information on the subsidiaries are as follows (continued):

Name	Principal activities	Group's effective interest	
		2025	2024
<u>Incorporated in the Philippines</u>			
Subsidiaries held through Fintech Platform Ventures Pte. Ltd.			
Finscore, Inc. ("Finscore") ²	Provision of alternative data credit scoring powered by telco data and advanced analytics	100%	100%
CC Mobile Financial Services Philippines, Inc. ("CCM") ²	Provision of technical support services to related company	100%	100%
<u>Incorporated in Thailand</u>			
Subsidiary held through Fintech Platform Ventures Pte Ltd			
CTOS Digital Limited ³	Investment holding	49%	-

¹ Audited by PricewaterhouseCoopers PLT (LLP0014401-LCA & AF 1146) ("PwC Malaysia"), auditors of the Company.

² The financial statements of these companies are audited by firms other than the auditors of the Company.

³ Entity is not required to be audited under the laws of the country of incorporation.

15. INVESTMENTS IN ASSOCIATES

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Unquoted shares	504,618	514,721	504,618	504,618
Share of post-acquisition results and reserves	(6,928)	71,653	-	-
Share of net assets of associates	497,690	586,374	504,618	504,618

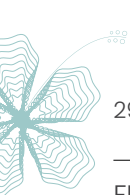
NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

15. INVESTMENTS IN ASSOCIATES (CONTINUED)

The details of the associates are as below:

Name	Principal activities	Group's effective interest	
		2025	2024
<u>Incorporated in Malaysia</u>			
Associate held through Enfo and CTOS Insights			
Experian Information Services (Malaysia) Sdn. Bhd. ("Experian")	Provision of credit reporting business, credit bureau and information services	-	26%
Associate held by the Company			
Juris Technologies Sdn. Bhd. ("JurisTech")	Software development	49%	49%
RAM Holdings Berhad ("RAM")	Investment holding	57.675%	57.675%
<u>Incorporated in Thailand</u>			
Associate held by the Company			
Business Online Public Company Limited ("BOL")	Service provider and developer of local and global financial information system and as an online and offline business information service provider as well as consulting service and database management	24.825%	24.825%



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

15. INVESTMENTS IN ASSOCIATES (CONTINUED)

(a) Equity interest in associates

RAM

The Group's effective shareholding is more than 50% in RAM, however the Group does not have control over RAM and the ability to direct the relevant activities of RAM. This is because the power to direct the relevant activities resides with the Board of Directors of RAM and the decisions on relevant activities are approved via a simple majority irrespective of the equity interest of the shareholders who appointed the directors. The Group does not have the ability to appoint majority of the directors in RAM due to the terms of the Board Charter of RAM which requires at least 75% independent and non-executive directors and the Constitution of RAM which requires any appointment of board members to be approved by the Securities Commission Malaysia ("SC"), or if required, such other relevant authority. Therefore, the Group continues to have significant influence in RAM and account for this investment as an associate.

The Group has performed an impairment assessment on this investment. The recoverable amount of the investment in RAM is determined based on value-in-use calculations. These calculations use post-tax cash flow projections adjusted for financing cash flows based on financial forecasts covering five years period which reflect management's expectations of revenue and EBITDA based on past experience and future expectations of business performance. The calculation of the value in-use has been probability-weighted on 3 possible outcomes, which takes into account the possible variations in the amount and timing of the future cashflows.

For the financial year ended 31 December 2025

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	5%	10%	2%
(Year 2 - 5)	5%	10%	2%
EBITDA margin (Year 1)	26%	38%	26%
(Year 2 - 5)	26%	38%	26%
Pre-tax discount rate	12.2%	12.3%	12.1%
Terminal growth rate		2.0%	

The most sensitive assumption in the value-in-use calculations is revenue growth rate. A 2% decrease in revenue growth rate for the financial years 2026 to 2030 in Scenario 1, with all other inputs remain constant, would result in the carrying amount exceeding its recoverable amount by RM19.5 million.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

15. INVESTMENTS IN ASSOCIATES (CONTINUED)

(a) Equity interest in associates (continued)

BOL

As at 31 December 2025 and 31 December 2024, the quoted share price of BOL is lower than the carrying value of the investment in BOL. Hence, the Group has performed an impairment assessment on this investment.

The recoverable amount of the investment in BOL is determined based on value-in-use calculations. These calculations use post-tax cash flow projections adjusted for financing cash flows based on financial forecasts covering five years period which reflect management's expectations of revenue and EBITDA based on past experience and future expectations of business performance. The calculation of the value-in-use has been probability-weighted on 3 possible outcomes, which takes into account the possible variations in the amount and timing of the future cashflows.

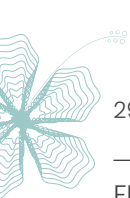
For the financial year ended 31 December 2025

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	12%	12%	7%
(Year 2 - 5)	12%	12%	7%
EBITDA margin (Year 1)	43%	45%	43%
(Year 2 - 5)	43%	45%	43%
Pre-tax discount rate		11.0%	
Terminal growth rate		2.0%	

For the financial year ended 31 December 2024

Assumptions	Scenario 1	Scenario 2	Scenario 3
	Descriptions		
Weightage	50%	25%	25%
Revenue growth rate (Year 1)	10%	10%	5%
(Year 2 - 5)	10%	10%	5%
EBITDA margin (Year 1)	47%	51%	45%
(Year 2 - 5)	46% - 47%	50% - 51%	44% - 45%
Discount rate		10.0%	
Terminal growth rate		2.0%	

The most sensitive assumption in the value-in-use calculations is revenue growth rate. A 6% decrease (2024: 5% decrease) in revenue growth rate for the financial years 2026 to 2030 (2024: 2025 to 2029) in Scenario 1, with all other inputs remain constant, would result in the carrying amount exceeding its recoverable amount by RM1.6 million (2024: RM8.3 million).



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**15. INVESTMENTS IN ASSOCIATES (CONTINUED)**

(a) Equity interest in associates (continued)

Experian

On 18 December 2025, the Group had entered into a share sale agreement with Experian (Malaysia) Sdn. Bhd. for the disposal of the entire 26% equity interest in Experian for a total disposal consideration of RM80.0 million to be settled in cash.

The disposal was completed on the same date, and it is reported in the current year as a discontinued operation. Effective 18 December 2025, Experian is no longer an associate of the Group.

Details of the disposal of the investment in associate are as below.

	Group	
	2025 RM'000	2024 RM'000
Cash consideration paid	80,000	-
Carrying amount of net assets	(60,417)	-
Gain on disposal before capital gains tax and direct costs	19,583	-
Capital gains tax	(1,600)	-
Direct costs	(80)	-
Gain on disposal after capital gains tax and direct costs	17,903	-

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

15. INVESTMENTS IN ASSOCIATES (CONTINUED)

(b) Summarised financial information

The tables below provide summarised financial information for the associates of the Group which are accounted for using the equity method. The information disclosed reflects the amounts presented in the financial statements of the associates and not the Group's share of those amounts. They have been amended to reflect adjustments made by the Group when using the equity method, including fair value adjustments.

	Experian		BOL		JurisTech		RAM	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Summarised statement of financial position								
Current assets	-	75,681	94,118	90,623	68,551	54,417	147,587	148,996
Non-current assets	-	931	114,696	105,702	41,607	38,206	43,683	99,229
Current liabilities	-	(25,820)	(42,802)	(32,019)	(24,205)	(17,010)	(23,404)	(19,525)
Non-current liabilities	-	-	(17,609)	(18,247)	(6,280)	(7,103)	(10,108)	(21,952)
Net assets	-	50,792	148,403	146,059	79,673	68,510	157,758	206,748
Group's share in %	0%	26%	24.825%	24.825%	49%	49%	57.675%	57.675%
Group's share of net assets	-	13,206	36,841	36,259	39,040	33,570	90,987	119,242
Goodwill	-	51,796	114,135	115,614	188,897	188,897	27,790	27,790
Carrying amount at end of financial year	-	65,002	150,976	151,873	227,937	222,467	118,777	147,032
Quoted fair value	-	-	135,154	143,553	-	-	-	-

FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

15. INVESTMENTS IN ASSOCIATES (CONTINUED)

(b) Summarised financial information (continued)

The tables below provide summarised financial information for the associates of the Group which are accounted for using the equity method. The information disclosed reflects the amounts presented in the financial statements of the associates and not the Group's share of those amounts. They have been amended to reflect adjustments made by the Group when using the equity method, including fair value adjustments. (continued)

	Experian		BOL		JurisTech		RAM	
	2025	2024	2025	2024	2025	2024	2025	2024
	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
<u>Summarised statement of comprehensive income</u>								
Revenue	88,374	81,600	104,957	93,838	89,787	73,163	62,961	62,466
Profit for the financial year/period	17,462	14,692	34,985	32,577	27,545	23,047	16,610	12,870
Other comprehensive income	-	-	57	(155)	-	-	-	-
Share of total comprehensive income of associate	4,540	3,820	8,699	8,049	13,497	11,293	9,580	7,423
Dividends received from associates	9,124	575	8,120	7,558	8,027	3,175	37,835	4,326

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

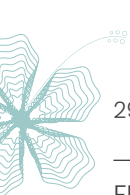
16. DEFERRED TAXATION

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities and when the deferred taxes relate to the same tax authority. The following amounts, determined after appropriate offsetting, are shown in the statement of financial position:

	Group	
	2025 RM'000	2024 RM'000
Deferred tax assets	335	1,709
Deferred tax liabilities	(2,967)	-
Deferred tax (liabilities)/assets (net)	(2,632)	1,709

The analysis of deferred tax assets and deferred tax liabilities is as follows:

	Group	
	2025 RM'000	2024 RM'000
Deferred tax assets:		
- to be recovered after more than 12 months	4,737	4,902
- to be recovered within 12 months	3,942	2,838
	8,679	7,740
Deferred tax liabilities		
- to be settled after more than 12 months	(9,112)	(5,246)
- to be settled within 12 months	(2,199)	(785)
	(11,311)	(6,031)
Deferred tax (liabilities)/assets (net)	(2,632)	1,709



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**16. DEFERRED TAXATION (CONTINUED)**

The analysis of deferred tax assets and deferred tax liabilities is as follows (continued):

	Note	Group	
		2025 RM'000	2024 RM'000
At 1 January		1,709	265
(Charged)/credited to profit or loss:	10	(4,341)	1,444
- provisions and accruals		(78)	276
- property, plant and equipment		271	(695)
- right-of-use assets		600	(5,187)
- contract liabilities		1,364	1,537
- lease liabilities		(486)	5,235
- receivables		140	185
- intangible assets		(6,151)	100
- unutilised tax losses		(1)	(7)
At 31 December		(2,632)	1,709

The movements in deferred tax assets and liabilities during the financial year comprise the following:

	Group	
	2025 RM'000	2024 RM'000
Deferred tax assets (before offsetting):		
- receivables	325	185
- provisions and accruals	208	286
- contract liabilities	3,241	1,877
- lease liabilities	4,813	5,299
- unutilised tax losses	92	93
	8,679	7,740
Offsetting	(8,344)	(6,031)
Deferred tax assets (after offsetting)	335	1,709
Deferred tax liabilities (before offsetting):		
- property, plant and equipment	(470)	(741)
- right-of-use assets	(4,648)	(5,248)
- intangible assets	(6,193)	(42)
	(11,311)	(6,031)
Offsetting	8,344	6,031
Deferred tax liabilities (after offsetting)	(2,967)	-

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

17. RECEIVABLES, DEPOSITS AND PREPAYMENTS

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Non-current</u>					
Deposits		781	780	-	-
<u>Current</u>					
Trade receivables	(a)	58,117	54,451	-	-
Allowance for impairment - trade receivables	27(c)	(3,003)	(1,919)	-	-
Trade receivables - net		55,114	52,532	-	-
Other receivables		2,336	2,156	31	-
Deposits		347	943	13	30
Prepayments		14,816	17,508	343	279
		72,613	73,139	387	309

(a) Information about the impairment of trade receivables and the Group's exposure to credit risk is disclosed in Note 27(c).

18. AMOUNTS DUE FROM/(TO) RELATED PARTIES

The amounts due from/(to) related parties are trade in nature, unsecured, interest free and with credit periods of up to 45 days. The amounts are denominated in RM and USD.

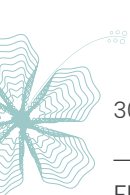
19. CASH AND BANK BALANCES

Cash and cash equivalents at the end of the financial year comprise the following:

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Cash and bank balances	30,263	19,369	3,683	2,494
Fixed deposits with licensed banks	30,000	-	-	-
	60,263	19,369	3,683	2,494
Less: Restricted cash	(2,102)	(2,051)	(2,102)	(2,051)
Cash and cash equivalents	58,161	17,318	1,581	443

Fixed deposits with licensed banks as at the end of the financial year are placed for tenures ranging from 30 to 60 days and bear interest at rates between 3.45% and 3.55% per annum.

Restricted cash comprise amounts held in a debt service reserve account associated with the term loan facilities.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**19. CASH AND BANK BALANCES (CONTINUED)**

The credit quality of bank balances can be assessed by reference to external credit ratings as follows:

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Local licensed banks ⁽¹⁾ :				
- AAA	1,305	2,067	15	3
- AA1	48,587	10,185	3,668	2,491
- AA2	197	2	-	-
- AA3	-	-	-	-
- Unrated	5	5	-	-
Non-local licensed banks	10,169	7,110	-	-
	60,263	19,369	3,683	2,494

Note:

⁽¹⁾ Source: Ratings provided by RAM Ratings Services Berhad.

20. PAYABLES AND ACCRUALS

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Current</u>				
Trade payables and accruals	20,408	21,800	-	-
Other payables and accruals*	34,444	36,559	19,523	20,392
Deposits payable to customers	1,742	1,726	-	-
Duties and tax payable	5,905	5,139	7	7
Payroll liabilities	3,540	2,772	169	125
Payroll accruals	4,428	1,885	64	54
	70,467	69,881	19,763	20,578

Trade and other payables of the Group and the Company carry credit periods ranging from 0 to 60 days (2024: 0 to 60 days).

* Included in other payables and accruals is the dividends accrued of RM17,325,000 (2024: RM19,403,999) payable to the shareholders of the Company. Subsequently, the dividends have been paid on 28 January 2026 (2024: paid on 17 January 2025).

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

21. AMOUNTS DUE FROM/(TO) SUBSIDIARIES

The amounts due from subsidiaries are unsecured and denominated in RM and USD. The current balances are repayable on demand. The non-current balance relates to a loan of USD372,000 with a tenure of 3 years with repayment due on 20 August 2028 and bears interest rate of 5.95% per annum.

In the previous financial year, there are advances to a subsidiary amounting to RM26,500,000 with a variable rate of 5.19% per annum as at reporting date, based on a rate of 1.5% above Cost of Funds and are repayable on demand.

The amounts due to subsidiaries are unsecured, interest free and are repayable on demand. The amount is denominated in RM.

Reconciliation of amount due from subsidiaries to cash flows from investing activities:

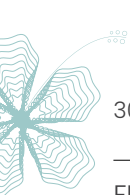
	Company	
	2025 RM'000	2024 RM'000
At 1 January	27,058	-
Advances to subsidiaries	97,553	31,745
Repayment of advances from subsidiaries	(99,585)	(4,687)
At 31 December	25,026	27,058

Reconciliation of amount due from subsidiaries to cash flows from financing activities:

	Company	
	2025 RM'000	2024 RM'000
At 1 January	-	876
Repayment of advances from subsidiaries	-	(876)
At 31 December	-	-

Reconciliation of amount due to subsidiaries to cash flows from financing activities:

	Company	
	2025 RM'000	2024 RM'000
At 1 January	1,691	-
Advances from subsidiaries	50,400	7,060
Repayment of advances to subsidiaries	(6,307)	(5,369)
At 31 December	45,784	1,691



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

22. BORROWINGS

	Note	Group and Company	
		2025 RM'000	2024 RM'000
<u>Current</u>			
Term loan	(a)	38,576	33,655
Revolving credit	(b)	-	26,500
		38,576	60,155
<u>Non-current</u>			
Term loan	(a)	65,476	104,816
Total borrowings		104,052	164,971

(a) Term loan

(i) Term loan facility RM70.0 million

The Company entered into a RM70.0 million loan facility agreement on 28 March 2022. The term loan was fully drawn down on 29 March 2022 to fund the acquisition of JurisTech and incurred transaction costs of RM0.8 million. The term loan is repayable on a quarterly basis commencing on 31 March 2025 with final maturity on 31 March 2029.

This term loan bears interest at a variable rate of 5.34% (2024: 5.68%) as at reporting date, based on a rate of 2.0% (2024: 2.0%) above Cost of Funds.

Proceeds from occurrence of certain mandatory prepayment events which includes 100.0% net dividend received in respect of the BOL pledged shares shall be utilised to repay the total outstanding loan balance.

(ii) Term loan facility RM104.2 million

The Company entered into a RM110.0 million supplemental master facilities agreement on 23 August 2022. The Company has drawn down RM92.7 million and RM11.5 million of the term loan in September 2022 and October 2022 respectively to fund the acquisition of RAM and incurred transaction costs of RM1.2 million. The balance undrawn facility amount of RM5.8 million has been cancelled on 1 November 2022. The term loan is repayable on a quarterly basis commencing on 2 December 2022 with final maturity on 31 August 2027.

This term loan bears interest at a variable rate of 4.34% (2024: 4.68%) as at reporting date, based on a rate of 1.0% above Cost of Funds.

All proceeds arising from the mandatory prepayment events shall be utilised to repay the total outstanding loan balance.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

22. BORROWINGS (CONTINUED)

(a) Term loan (continued)

(iii) Term loan facility RM30.0 million

The Company entered into a RM30.0 million supplemental master facilities agreement on 18 December 2023 to refinance the revolving credit used to fund the acquisitions of Alt Decisions and Fintech in the previous financial year. The Company has drawn down RM30.0 million of the term loan in June 2024 and incurred transaction costs of RM0.4 million. The term loan is repayable on a quarterly basis commencing on 12 June 2024 with final maturity on 12 June 2029.

This term loan bears interest at a variable rate of 4.34% (2024: 4.68%) as at reporting date, based on a rate of 1.0% above Cost of Funds.

The external lenders of the term loan facility of RM70.0 million, RM104.2 million, RM30.0 million require the Company to maintain financial covenant ratios on the Group's Finance Service Coverage Ratio ("FSCR") of minimum 1.25x, gearing covenant which shall not exceed 1.50x and maintain a positive Group Tangible Net Worth at all times. These financial covenant ratios have been fully complied with by the Group and the Company for the financial years ended 31 December 2025 and 31 December 2024.

(b) Revolving credit

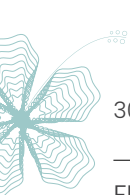
The Company entered into a revolving credit facility on 22 February 2022 that provides for borrowings of up to a maximum aggregate principal amount of RM50.0 million with a variable rate of 4.84% (2024: 5.19%) as at the reporting date, based on a rate of 1.5% above Cost of Funds and is repayable on demand.

A total of RM88.0 million and RM44.5 million was drawn down from the revolving credit facility in the financial year ended 31 December 2025 and 31 December 2024 respectively.

The Group and the Company have access to the following undrawn borrowing facilities at the end of the reporting date:

	Group and Company	
	2025 RM'000	2024 RM'000
<u>Floating rate</u>		
Revolving credit	50,000	23,500

The external lender of the revolving credit facility require the Company to maintain financial covenant ratios on the Group's gearing covenant, which shall not exceed 1.50x and maintain a positive Group Tangible Net Worth at all times. These financial covenant ratios have been fully complied with by the Group and the Company for the financial years ended 31 December 2025 and 2024.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**22. BORROWINGS (CONTINUED)**

Reconciliation of borrowings from financing activities:

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
At 1 January	164,971	149,543	164,971	149,543
Drawdown during the financial year	88,000	74,500	88,000	74,500
Repayment	(149,131)	(58,719)	(149,131)	(58,719)
Transaction costs	(17)	(1,017)	-	(1,010)
Interest on borrowings	8,393	8,800	6,494	7,882
Interest paid	(8,164)	(8,136)	(6,282)	(7,225)
At 31 December	104,052	164,971	104,052	164,971

Term loan facility of RM70.0 million, RM104.2 million, RM30.0 million and revolving credit

In accordance with the facilities agreement during the tenure of the banking facility, the Company and its subsidiaries were restricted from undertaking any further financing and other forms of indebtedness from any financial institutions without prior written consent of the lenders.

The borrowings were secured against:

- (a) Charge over designated accounts
- by way of first party first legal charge over all designated accounts of the Borrower, inclusive of Proceeds Account and Finance Service Reserve Account ("FSRA").
- (b) Charge over Associates' shares
- by way of fixed charge by way of Deed of Share Pledge over 57.675% of RAM Shares and assignment of all dividend payments from the Pledged Shares;
 - by way of fixed charge by way of Deed of Share Pledge over 22.65% of BOL Shares and assignment of all dividend payments from Pledged Shares;
 - by way of fixed charge by way of Deed of Share Pledge over 80% of Alt Decisions Shares and 100% of Fintech Shares.
- (c) Joint, several and irrevocable Corporate Guarantee
- Fresh Corporate Guarantee of up to RM70 million, RM104.2 million, RM30.0 million and RM50.0 million by the following companies:
 - i. CTOS Data Systems Sdn. Bhd.
 - ii. CTOS Business Systems Sdn. Bhd.
 - iii. CTOS IDS Sdn. Bhd.
 - iv. Enfo Sdn. Bhd.
 - v. CTOS Insights Sdn. Bhd.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

22. BORROWINGS (CONTINUED)

Contractual terms of borrowings

	Contractual interest rate at reporting date (per annum)	Functional currency/ currency exposure	Total carrying amount	Maturity profile		
				2026	2027	2028-2030
				<1 year	1-2 years	2-5 years
At 31 December 2025	%		RM'000	RM'000	RM'000	RM'000
Term loan	1.0 - 2.0% + COF ⁽¹⁾	RM	104,052	38,576	38,088	27,388
Revolving credit	1.5% + COF ⁽¹⁾	RM	-	-	-	-
			104,052	38,576	38,088	27,388

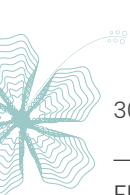
	Contractual interest rate at reporting date (per annum)	Functional currency/ currency exposure	Total carrying amount	Maturity profile		
				2025	2026	2027-2029
				<1 year	1-2 years	2-5 years
At 31 December 2024	%		RM'000	RM'000	RM'000	RM'000
Term loan	1.0 - 2.0% + COF ⁽¹⁾	RM	138,471	33,655	38,712	66,104
Revolving credit	1.5% + COF ⁽¹⁾	RM	26,500	26,500	-	-
			164,971	60,155	38,712	66,104

Note:

⁽¹⁾ COF denotes Cost of Funds

23. PROVISION FOR RESTORATION COSTS

	Group	
	2025 RM'000	2024 RM'000
At 1 January	1,168	694
Capitalised in right-of-use assets	-	1,100
Reversal of restoration costs	-	(704)
Accretion expense included in finance costs	74	78
At 31 December	1,242	1,168



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

24. SHARE CAPITAL AND TREASURY SHARES

(a) Ordinary shares

	Group and Company			
	Number of shares '000	2025 RM'000	Number of shares '000	2024 RM'000
Issued and fully paid:				
Ordinary shares:				
At 1 January	2,310,000	584,047	2,310,000	584,047
Cancellation of treasury shares	(19,469)	(4,922)	-	-
At 31 December	2,290,531	579,125	2,310,000	584,047

(b) Treasury shares

During the financial year, the Company repurchased 34,919,200 of its issued ordinary shares from the open market on Bursa Securities. The cost of repurchasing these shares amounted to RM30,441,074 which was recorded under treasury shares, and direct attributable cost of RM124,000 was charged to the retained earnings.

On 17 November 2025, the Company cancelled 19,469,200 of its treasury shares amounted to RM17,231,000 with adjustments of RM4,922,000 and RM12,309,000 to the ordinary share capital and retained earnings respectively.

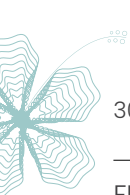
NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

25. OTHER RESERVES

	Group	
	2025 RM'000	2024 RM'000
<u>Foreign currency translation reserve</u>		
At 1 January	(6,000)	513
Currency translation differences arising from translation of:		
- subsidiaries	(3,130)	(1,142)
- associate	(1,971)	(5,371)
At 31 December	(11,101)	(6,000)
<u>Fair value reserve</u>		
At 1 January	6,308	6,292
Other comprehensive income:		
- gain on changes in value of debt investment designated at FVOCI - net of income tax	21	7
- gain on changes in value of equity investments designated at FVOCI - net of income tax	-	9
At 31 December	6,329	6,308
<u>Share-based payment reserve</u>		
At 1 January	1,200	-
Share-based payment expense during the financial year	90	1,200
At 31 December	1,290	1,200
Total other reserves	(3,482)	1,508

	Company	
	2025 RM'000	2024 RM'000
<u>Share-based payment reserve</u>		
At 1 January	1,200	-
Share-based payment expense during the financial year	90	1,200
At 31 December	1,290	1,200



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

25. OTHER RESERVES (CONTINUED)

The share-based payment reserve arose from share options granted to eligible executives of the subsidiary in the Group pursuant to the ESOS. Terms of the scheme are disclosed in Note 3(n)(iii).

The Company established the Employees' Share Option Scheme ("ESOS") on 12 December 2023. The ESOS scheme is governed by the By-Laws which were approved by the shareholders on 11 December 2023 and is administered by the ESOS Committee which is appointed by the Board of Directors of the Company, in accordance with the By-Laws. The ESOS Committee may from time to time, offer ESOS to eligible employees of the Group.

The maximum number of new shares which may be made available under the ESOS and/or allotted and issued upon vesting of the new shares under the ESOS shall not exceed in aggregate 1% of the total number of issued shares of the Company (excluding treasury shares, if any) at any point in time during the duration of the ESOS.

During the financial year, 4,380,000 units (2024: 9,134,994 units) under the ESOS were granted to the eligible employees of the Group. Subject to the terms and conditions of the By-Laws governing the ESOS, the employees shall be entitled to subscribe for new ordinary shares in the Company, to be allotted and issued pursuant to the ESOS ("new shares"), upon meeting the vesting conditions.

The movement of the ESOS is as follows:

	Company	
	2025 RM'000	2024 RM'000
At 1 January	8,360	-
Granted	4,380	9,135
Vested	-	(775)
Forfeited	(9,095)	-
At 31 December	3,645	8,360

The Directors have not been granted any shares since ESOS implementation.

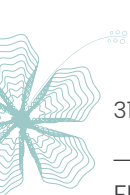
Foreign currency translation reserve is used to record exchange differences arising from the translation of financial statements of subsidiaries and an associate whose functional currency differs from the Group's presentation currency.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

26. FINANCIAL INSTRUMENTS BY CATEGORY

	Note	Group		Company	
		2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
<u>Financial assets at amortised cost</u>					
Receivables and deposits (excluding prepayments)	17	58,578	56,411	44	30
Amounts due from related parties	18	2,880	1,369	-	-
Amounts due from subsidiaries	21	-	-	32,285	30,128
Cash and bank balances	19	60,263	19,369	3,683	2,494
		121,721	77,149	36,012	32,652
<u>Financial liabilities at amortised cost</u>					
Payables and accruals (excluding statutory liabilities)	20	56,594	60,085	19,523	20,392
Amounts due to related parties	18	490	1,764	-	-
Amounts due to subsidiaries	21	-	-	46,373	1,691
Lease liabilities	12	20,040	22,081	312	-
Borrowings	22	104,052	164,971	104,052	164,971
		181,176	248,901	170,260	187,054



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**27. FINANCIAL RISK MANAGEMENT**

The Group's and the Company's financial risk management policy seeks to ensure that adequate financial resources are available for the development of the Group's and of the Company's businesses whilst managing its interest rate risk, credit risk, liquidity risk and cash flow risk. The Group and the Company operate within clearly defined guidelines that are approved by the Directors and the Group's and the Company's policy is to not engage in speculative transactions.

(a) Market risk

Market risk is the risk that the fair value or future cash flow of the financial instruments that will fluctuate because of changes in market prices. The various components of market risk that the Group and the Company are exposed to are discussed below.

(i) Foreign exchange risk

The objectives of the Group's and of the Company's currency risk management policies are to allow the Group and the Company to effectively manage the foreign exchange fluctuation against its functional currency that may arise from future commercial transactions and recognised assets and liabilities. The Group and the Company monitor the movement in foreign currency exchange rates closely to ensure their exposures are minimised.

The currency exposure of financial assets and financial liabilities of the Group and of the Company that are not denominated in the functional currency are set out below:

	Currency exposures			
	USD RM'000	SGD RM'000	EUR RM'000	Others RM'000
<u>Group</u>				
<u>At 31 December 2025</u>				
Receivables	4,508	572	-	7
Cash and bank balances	2,342	298	252	116
Amounts due from related parties	2,814	-	-	-
Payables	(810)	(33)	(1)	(35)
Amounts due to related parties	(224)	-	-	-
Net exposure	8,630	837	251	88
<u>At 31 December 2024</u>				
Receivables	850	327	-	48
Cash and bank balances	3,729	78	17	11
Amounts due from related parties	1,091	-	-	-
Payables	(1,123)	(372)	(2)	(4)
Net exposure	4,547	33	15	55

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

27. FINANCIAL RISK MANAGEMENT (CONTINUED)

(a) Market risk (continued)

(i) Foreign exchange risk (continued)

The currency exposure of financial assets and financial liabilities of the Group and of the Company that are not denominated in the functional currency are set out below (continued):

	Currency profile	
	USD RM'000	SGD RM'000
<u>Company</u>		
<u>At 31 December 2025</u>		
Cash and bank balances	346	-
<u>At 31 December 2024</u>		
Cash and bank balances	47	-
Payables	-	(58)

The sensitivity of the Group's and the Company's profit after tax and equity to a reasonably possible change in the USD, SGD and EUR exchange rate against the functional currencies, of RM, with all other factors remaining constant and based on the composition of assets and liabilities at the reporting date are set out as below:

	Impact on profit after tax/equity			
	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
USD/RM				
- strengthened 5%	328	173	13	2
- weakened 5%	(328)	(173)	(13)	(2)
SGD/RM				
- strengthened 5%	32	1	-	2
- weakened 5%	(32)	(1)	-	(2)
EUR/RM				
- strengthened 5%	10	1	-	-
- weakened 5%	(10)	(1)	-	-

The impact on profit after tax and equity is mainly as a result of foreign currency gain/losses on translation of USD, SGD and EUR denominated receivables, cash and bank balances, amounts due from related parties, amounts due to related parties and payables.

FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**27. FINANCIAL RISK MANAGEMENT (CONTINUED)**

(a) Market risk (continued)

(i) Interest rate risk

The Group's and the Company's interest rate risk arises from revolving credit and term loan carrying variable interest rates.

The net exposure of financial liabilities of the Group and Company to interest rate risk and the periods in which the borrowings mature or reprice (whichever is earlier) are as follows:

	Weighted average effective interest rate at reporting date	Total carrying amount	Floating interest rate		
			<1 year	1-2 years	2-5 years
Group and Company	%	RM'000	RM'000	RM'000	RM'000
<u>At 31 December 2025</u>					
Term loan	5.34	28,132	6,245	7,210	14,677
Term loan	4.34	75,920	32,331	30,878	12,711
Revolving credit	4.84	-	-	-	-
		104,052	38,576	38,088	27,388
<u>At 31 December 2024</u>					
Term loan	5.68	34,979	6,249	6,275	22,455
Term loan	4.68	103,492	27,406	32,437	43,649
Revolving credit	5.19	26,500	26,500	-	-
		164,971	60,155	38,712	66,104

Interest rate sensitivity

This is mainly attributable to the Group's and the Company's exposure to interest rates on their variable rate borrowings. The assumed movement in basis points for interest rate sensitivity analysis is based on the currently observable market environment.

The sensitivity of the Group's and Company's profit after tax and equity to a reasonably possible change in interest rates with all other factors held constant and based on the composition of liabilities with floating interest rates at the reporting date are as follows:

Group and Company	Impact on profit after tax/equity	
	2025	2024
	RM'000	RM'000
Interest rate		
- increased by 1%	(791)	(1,254)
- decreased by 1%	791	1,254

The impact on profit after tax and equity is mainly as a result of interest expenses on floating rate borrowings.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

27. FINANCIAL RISK MANAGEMENT (CONTINUED)

(b) Liquidity risk

The objectives of the Group's and the Company's liquidity risk management policies are to monitor rolling forecasts of the Group's and the Company's liquidity requirements to ensure that they have sufficient cash to meet operational needs and availability of funding to cater for growth and expansion. Liquidity risk can be mitigated by forecasting and monitoring cash flow regularly, optimising working capital and managing credit facilities effectively.

The undiscounted contractual cash flows of the financial instruments as at the reporting date are as follows:

	Carrying amount RM'000	Total undiscounted contractual cash flow RM'000	<1 year RM'000	1-2 years RM'000	2-5 years RM'000	>5 years RM'000
<u>31 December 2025</u>						
<u>Group</u>						
Payables and accruals	56,594	56,594	56,594	-	-	-
Amounts due to related parties	490	490	490	-	-	-
Lease liabilities	20,040	24,476	2,468	3,217	9,901	8,890
Term loan	104,052	112,570	43,314	40,633	28,623	-
	181,176	194,130	102,866	43,850	38,524	8,890
<u>Company</u>						
Payables and accruals	19,523	19,523	19,523	-	-	-
Amounts due to subsidiaries	46,373	46,373	46,373	-	-	-
Lease liabilities	312	378	50	50	149	129
Term loan	104,052	112,570	43,314	40,633	28,623	-
	170,260	178,844	109,260	40,683	28,772	129

FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)

27. FINANCIAL RISK MANAGEMENT (CONTINUED)

(b) Liquidity risk (continued)

The undiscounted contractual cash flows of the financial instruments as at the reporting date are as follows (continued):

	Carrying amount RM'000	Total undiscounted contractual cash flow RM'000	<1 year RM'000	1-2 years RM'000	2-5 years RM'000	>5 years RM'000
<u>31 December 2024</u>						
<u>Group</u>						
Payables and accruals	60,085	60,085	60,085	-	-	-
Amounts due to related parties	1,764	1,764	1,764	-	-	-
Lease liabilities	22,081	27,608	3,214	2,416	9,742	12,236
Term loan	138,471	153,726	40,334	43,519	69,873	-
Revolving credit	26,500	26,615	26,615	-	-	-
	248,901	269,798	132,012	45,935	79,615	12,236
<u>Company</u>						
Payables and accruals	20,392	20,392	20,392	-	-	-
Amounts due to subsidiaries	1,691	1,691	1,691	-	-	-
Term loan	138,471	153,726	40,334	43,519	69,873	-
Revolving credit	26,500	26,615	26,615	-	-	-
	187,054	202,424	89,032	43,519	69,873	-

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

27. FINANCIAL RISK MANAGEMENT (CONTINUED)

(b) Liquidity risk (continued)

The Company reported net current liabilities position (current liabilities exceeding current assets) of RM68.5 million as of 31 December 2025 (2024: RM49.5 million). The Directors have assessed the Company has sufficient liquidity to meet its operating requirements, financing and capital commitments over the next twelve months from the reporting date, based on cash flow forecasts and availability of undrawn borrowing facilities amounting to RM50.0 million (2024: RM23.5 million) of the Company. The cash flow forecasts are based on the assumptions of continued positive cash flow generation from the Company's business operations and dividend income from subsidiaries and associates, which are supported by historical performance, expected future performance and factoring in anticipated one-off transactions.

Therefore, the Directors have prepared the financial statements of the Company on a going concern basis.

(c) Credit risk

The objectives of the Group's and of the Company's credit risk management policies are to manage its exposure to credit risk from deposits, cash and bank balances, receivables and derivative financial instruments. It does not expect any third parties to fail to meet their obligations given the Group's and the Company's policy of selecting creditworthy counterparties. The Group's and the Company do not have any derivative financial instruments as the reporting date.

Trade and other receivables

Credit risks of trade and other receivables are controlled by the application of credit approvals, limits and monitoring procedures. Credit risks are minimised and monitored via limiting the Group's and the Company's dealings with creditworthy business partners and customers. Trade and other receivables are monitored on an ongoing basis via the Group's and the Company's management reporting procedures. For amounts due from subsidiaries and related parties, the exposure to bad debts is not significant since the subsidiaries and the related parties do not have historical default.

Concentration of credit risk

The Group and the Company have no significant concentration of credit risk as the Group's and the Company's policy limits the concentration of financial exposure to any single counterparty.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)

27. FINANCIAL RISK MANAGEMENT (CONTINUED)

(c) Credit risk (continued)

Impairment of trade receivables

The Group applies the MFRS 9 simplified approach to measuring ECL which uses a lifetime expected loss allowance for all trade receivables.

To measure the ECL, trade receivables have been grouped based on shared credit risk characteristics and the days past due. The expected loss rates are determined based on 3-year historical ageing profile and the corresponding historical credit losses experienced within this period.

The historical loss rates are adjusted to reflect forward-looking information on macroeconomic factors affecting the ability of the customers to settle the receivables. Some of the factors which the Group has identified include Overnight Interest Rate, Kuala Lumpur Composite Index ("KLCI") and exchange rate of RM:USD and has adjusted the historical loss rates based on expected changes in such factors.

On that basis, the loss allowances as at 31 December 2025 and 31 December 2024 were determined as follows for trade receivables:

	Current to 30 days past due RM'000	31 to 60 days past due RM'000	61 to 90 days past due RM'000	91 to 120 days past due RM'000	121 to 150 days past due RM'000	>150 days past due RM'000	Total RM'000
<u>Group</u>							
Expected loss rate ⁽¹⁾	0.04% - 1.37%	0.04% - 3.89%	0.04% - 8.70%	0.04% - 14.66%	0.04% - 20.43%	0.04% - 100.0%	
Gross carrying amount:							
- trade receivables	38,694	7,299	4,064	1,656	1,052	5,352	58,117
Less allowance:							
- trade receivables	(124)	(109)	(55)	(49)	(41)	(2,625)	(3,003)

Note:

⁽¹⁾ The expected loss rate comprises customers with different risk profiles.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

27. FINANCIAL RISK MANAGEMENT (CONTINUED)

(c) Credit risk (continued)

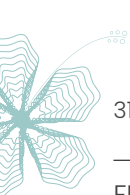
Impairment of trade receivables (continued)

On that basis, the loss allowances as at 31 December 2025 and 31 December 2024 were determined as follows for trade receivables (continued):

At 31 December 2024	Current to 30 days past due RM'000	31 to 60 days past due RM'000	61 to 90 days past due RM'000	91 to 120 days past due RM'000	121 to 150 days past due RM'000	>150 days past due RM'000	Total RM'000
Group							
Expected loss rate ⁽ⁱ⁾	0.20% - 1.02%	0.20% - 3.34%	0.20% - 8.15%	0.20% - 13.41%	0.20% - 19.02%	0.20% - 100.0%	
Gross carrying amount:							
- trade receivables	41,823	4,875	1,455	1,592	604	4,102	54,451
Less allowance:							
- trade receivables	(73)	(30)	(107)	(43)	(50)	(1,616)	(1,919)

Note:

⁽ⁱ⁾ The expected loss rate comprises customers with different risk profiles.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**27. FINANCIAL RISK MANAGEMENT (CONTINUED)**

(c) Credit risk (continued):

Impairment of trade receivables (continued)

Movement on the Group's loss allowances for receivables is as follows:

	Group	
	2025 RM'000	2024 RM'000
At 1 January	1,919	981
Charged to profit or loss	1,118	938
Currency translation differences	(34)	-
At 31 December	3,003	1,919

Deposits, cash and bank balances

For deposits, cash and bank balances and short-term investments, the Group and the Company seek to ensure that cash assets are invested safely and profitably by assessing counterparty risks and allocating placement limits for various creditworthy financial institutions. The Group and the Company consider the risk of material loss in the event of non-performance by the above parties to be unlikely. The Group's and the Company's maximum exposure to credit risk is equal to the carrying value of those financial instruments.

Other receivables and deposits

Other receivables and deposits are considered to have low risk of defaults and historically there were minimal instances where contractual cash flow obligations have not been met. The identified impairment loss was immaterial.

(d) Capital risk management

The Group's and the Company's primary objective of capital risk management is to maintain an optimal capital base to support the businesses and maximise shareholders value. The Directors monitor the debt levels to maintain an optimum debt-to-equity ratio that complies with the debt covenants. The Group manages the capital structure and makes adjustment to it, in light of changes in economic condition including the interest rate movements. To maintain and adjust the capital structure, the Group may adjust dividend payment to shareholders, return capital to shareholders or issue new shares.

The Company had entered into borrowing facilities agreements as disclosed in Note 22 and Note 27(b) to the financial statements. The external lenders of the term loan facility of RM70.0 million, RM104.2 million, RM30.0 million and revolving credit facility require the Company to maintain financial covenant ratios on the Group's Finance Service Coverage Ratio ("FSCR"), gearing covenant and maintain a positive Group Tangible Net Worth at all times. These financial covenant ratios have been fully complied with by the Group and the Company for the financial years ended 31 December 2025 and 31 December 2024.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

27. FINANCIAL RISK MANAGEMENT (CONTINUED)

(d) Capital risk management (continued)

The Group's net debt-to-equity ratio as of the reporting date is as follows:

	Note	Group	
		2025 RM'000	2024 RM'000
Total borrowings	22	104,052	164,971
Cash and cash equivalents (excluding restricted cash)	19	(58,161)	(17,318)
Net debt		45,891	147,653
Total equity		606,700	603,201
Net debt-to-equity ratio (times)		0.08	0.24

There were no changes in the Group's approach to capital management during the financial year. Other than the securities on borrowings as disclosed in Note 22, the Group is not subject to any other externally imposed capital requirements.

(e) Offsetting financial assets and financial liabilities

(i) Financial assets

There is no offsetting arrangement in 2024 and 2025.

(ii) Financial liabilities

There is no offsetting arrangement in 2024 and 2025.

(f) Fair value estimation

Fair values are categorised into different levels in a fair value hierarchy based on the inputs used in the valuation technique as follows:

Level 1 - quoted prices (unadjusted) in active markets for identical assets or liabilities;

Level 2 - inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices); and

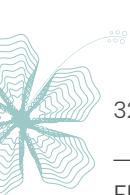
Level 3 - inputs for the asset or liability that are not based on observable market data (i.e. unobservable inputs).

a. Financial instruments carried at amortised cost

The carrying amounts of financial assets and liabilities of the Group and the Company at the reporting date approximated their fair values.

b. Financial instruments carried at fair value

In the financial years ended 31 December 2025 and 31 December 2024, there are no financial assets and liabilities of the Group and the Company measured at fair values.



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

28. RELATED PARTIES

In addition to related party disclosures mentioned elsewhere in the financial statements, set out below are other significant transactions, balances and commitments. The related party transactions described below were carried out on agreed terms with the related parties.

CIBI Holdings Pte Ltd (“CIBI Holdings”), being an entity connected to certain directors of the Company, is an investment holding company. CDS provides advisory and support services relating to credit bureaus to CIBI Holdings from September 2021.

CIBI Information, Inc (“CIBI”), being an entity connected to certain directors of the Company, is a credit bureau incorporated in the Philippines. CDS provides advisory, support and software services to CIBI relating to implementation, deployment and project management services.

CIBI Tech Ventures, Inc. (“CTVI”), being an entity connected to certain directors of the Company, is engaged in the business of provisioning credit reporting data services incorporated in the Philippines. CDS provides advisory, support and software services to CTVI relating to implementation, deployment and project management services.

Juris Technologies Sdn Bhd (“JurisTech”) is an associate of the Company.

	2025 RM'000	2024 RM'000
<u>Significant related party transactions</u>		
<u>Group</u>		
Purchase of services		
- software services from JurisTech	3,344	4,121
- credit reports from CIBI	579	185
Sale of services:		
- advisory and support services to CIBI Holdings	-	1,684
- advisory, support and software services to CIBI	3,630	1,083
- advisory and support services to JurisTech	-	4
- advisory and support services to CTVI	570	816
<u>Significant inter-company transactions</u>		
<u>Company</u>		
Amounts charged to subsidiaries:		
- management fees	5,324	3,618
- share-based payment expense	90	862
Advances to subsidiaries	97,553	31,745
Advances from subsidiaries	50,400	7,060

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

28. RELATED PARTIES (CONTINUED)

Dividends from subsidiaries

During the financial year ended 31 December 2025, the dividend income recognised by the Company from investment in subsidiaries amounted to RM74.8 million (2024: RM78.7 million) was received in cash.

Key management personnel remuneration

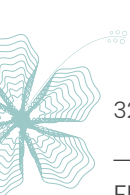
Key management personnel are those persons having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including any Director of that entity (both executive and non-executive).

The aggregate amount of emoluments received/receivable by key management personnel including Directors of the Company during the financial year is as follows:

	Group		Company	
	2025 RM'000	2024 RM'000	2025 RM'000	2024 RM'000
Fees	448	413	448	413
Salaries and other short-term employee benefits	9,201	11,953	2,934	2,572
Defined contribution plan	761	806	352	311
	10,410	13,172	3,734	3,296

29. DIVIDENDS

	2025	
	Single-tier tax-exempt dividend per share sen	Amount of dividends, single-tier tax-exempt RM'000
In respect of the financial year ended 31 December 2024:		
- fourth interim ordinary, paid on 30 April 2025	0.990	22,869
In respect of the financial year ended 31 December 2025:		
- first interim ordinary, paid on 23 July 2025	0.440	10,164
- second interim ordinary, paid on 24 October 2025	0.650	14,912
- third interim ordinary, paid on 28 January 2026	0.750	17,325
	1.840	42,401
	2.830	65,270



NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

29. DIVIDENDS (CONTINUED)

Subsequent to the financial year end, on 29 January 2026, the Company declared a fourth interim single-tier tax-exempt dividend of 0.860 sen per ordinary share amounting to RM19.6 million in respect of the financial year ended 31 December 2025 which will be paid on 28 April 2026.

The financial statements for the financial year ended 31 December 2025 do not reflect these dividends. Upon declaration, the cash dividend payment will be accounted for in equity as an appropriation of retained earnings during the financial year ending 31 December 2025.

	2024	
	Single-tier tax-exempt dividend per share sen	Amount of dividends, single-tier tax-exempt RM'000
In respect of the financial year ended 31 December 2023:		
- fourth interim ordinary, paid on 27 March 2024	1.706	39,408
In respect of the financial year ended 31 December 2024:		
- first interim ordinary, paid on 2 July 2024	0.640	14,784
- second interim ordinary, paid on 27 September 2024	0.780	18,018
- third interim ordinary, paid on 17 January 2025	0.840	19,404
	2.260	52,206
	3.966	91,614

30. CAPITAL COMMITMENTS AND CONTINGENT LIABILITIES

(a) Capital commitments

Significant capital expenditure contracted for at the end of reporting date but not recognised as liabilities is as follows:

	Group	
	2025 RM'000	2024 RM'000
Contracted:		
- property, plant and equipment	510	558
- intangible assets	1,536	2,544
	2,046	3,102

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

30. CAPITAL COMMITMENTS AND CONTINGENT LIABILITIES (CONTINUED)

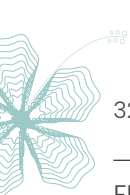
(b) Contingent liabilities

In the normal course of business, there are contingent liabilities arising from legal recourse sought on the Group's credit reporting operations. The Directors have assessed that these cases as possible obligations where outflow of resources are not probable.

- (i) In May 2023, CDS was served with a Writ Summons by a Plaintiff claiming negligence in CDS' credit report which contained the Plaintiff's bankruptcy proceeding that was discharged by the Court. CDS maintained that it has the right to publish the bankruptcy proceeding and had duly updated the status of the discharge of bankruptcy in the credit report as required under the CRA Act. The Plaintiff has among others sought for Special Damages and General Damages amounting to RM500,000 from CDS. The Trial took place on 8 January 2026, 17 and 18 March 2026 and concluded with both parties closing their respective cases. The Judge has fixed this matter for case management on 30 April 2026 for further directions on the filing of written submissions. The Judge has fixed this matter for case management on 30 April 2026 for further directions on the filing of written submissions.
- (ii) In July 2023, CDS was served with a Writ Summons by a Plaintiff for defamation with regard to Trade Credit Reference that was listed by the Second Defendant (a third party). CDS denies any publication of defamatory information in CDS Report. The Plaintiff has among others sought for an apology via social media and damages for libel amounting to RM8,000,000 against each Defendant. The Trial began on 17 January 2025 and 12 February 2025. Oral Submissions were held on 15 April 2025 and the Court fixed Decision on 30 May 2025. On 30 May 2025, the Judge has delivered her judgment in favour of CDS, and dismissed the Plaintiff's claim with cost of RM50,000 payable to CDS. The Plaintiff did not file any appeal within the appeal period.
- (iii) In April 2025, CDS was served with a Writ of Summon and a statement of claims by a group of two Plaintiffs. The Plaintiffs have alleged that CDS had via various actions (i) negligently published inaccurate and outdated reports containing wrong trade information, inaccurate corporate filings information, and information which damaged its reputation; and (ii) failed to fulfil fiduciary duties in ensuring information was accurate, correct, and up to date and relevant.

The Plaintiffs are seeking RM2,000,000 in damages, interest at 5% per annum from the date of judgment until full settlement, legal costs on a solicitor-client basis amounting to RM54,000 (inclusive of 8% SST) and other reliefs. Plaintiffs are alleging that CDS had; (i) defamed the Plaintiffs; (ii) negligent in preparing our credit reports and (iii) breached its statutory duty.

CDS files our Defence on 3 June 2025, and the Plaintiffs filed their reply to our Defence on 26 June 2025. Pursuant to the Case Management held on 9 January 2026, the matter has been fixed for Trial on 2 and 3 July 2026, and 19 to 21 August 2026.



FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)**31. EARNINGS PER SHARE**

(a) Basic

Basic and diluted earnings per share of the Group is calculated by dividing the profit attributable to the owners of the Company by the weighted average numbers of ordinary shares in issue during the financial year.

	Group	
	2025 RM'000	2024 RM'000
		Restated
Profit attributable to the owners of the Company (RM'000)		
- Continuing operations	82,416	102,451
- Discontinued operations	22,443	3,820
	104,859	106,271
Weighted average number of ordinary shares ('000)	2,302,052	2,310,000
Basic earnings per ordinary share (sen)		
- Continuing operations	3.6	4.4
- Discontinued operations	1.0	0.2
	4.6	4.6

(b) Fully diluted

The share options granted pursuant to ESOS are not included in the calculation of diluted earnings per share, because they are antidilutive for the financial year ended 31 December 2025. These share options could potentially dilute basic earnings per share in the future.

	Group	
	2025 RM'000	2024 RM'000
		Restated
Profit attributable to the owners of the Company (RM'000)		
- Continuing operations	82,416	102,451
- Discontinued operations	22,443	3,820
	104,859	106,271
Weighted average number of ordinary shares ('000)	2,302,052	2,310,000
Diluted earnings per ordinary share (sen)		
- Continuing operations	3.6	4.4
- Discontinued operations	1.0	0.2
	4.6	4.6

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

32. SEGMENT REPORTING

The Group is primarily engaged in credit reporting, digital software related services including software development, outsourcing and provision of training services and provision of alternative data credit scoring. Management has determined the operating segments to be based on the management reports reviewed by the chief operating decision makers ("CODM") that are used to make strategic decisions, for which discrete financial information is available. For management purposes, the Group has organised the operating segments into two reportable segments based on their geographical locations and separation of management teams. The reportable segments are summarised as follows:

- (i) Malaysia which comprises the provision of credit reporting services (sale of reports, monitoring and trade referencing services and other services), sale of digital solutions and provision of related installation and maintenance services as well as provision of comprehensive commercial credit reports and bulk commercial data sales to 3 distinct types of customer group, namely Key Accounts (Malaysia), Commercial and Direct-to-Consumer; and
- (ii) International which comprises the Key Accounts (International) customer group is in the business of provision of alternative data credit scores to customers.

The performance of the operating segments is measured based on segment profit calculated as profit for the relevant financial year plus tax expense, finance costs, depreciation and amortisation and foreign exchange losses less interest income, foreign exchange gains and share of profits of associates.

The share of results of associates represents the following:

- (i) business of a credit reporting, credit bureau and information services, a provider of credit enterprise software in Malaysia and a provider of independent credit rating services, sustainability rating services, environment, social and government analytics, data analytics, economic research and consultancy services, bond pricing and information services as well as credit opinions on ventures listed on the Investment Account Platform; and
- (ii) business of a service provider, developer of local and global financial information system and as an online and offline business information service provider as well as consulting service and database management in Thailand.

The CODM also reviews the revenue of the Malaysia and International segments by type of customers as disclosed in Note 5. All assets are managed based on their geographical locations. Capital expenditure comprises acquisition of subsidiaries, additions to property, plant and equipment and intangible assets.

FINANCIAL STATEMENTS

NOTES TO THE FINANCIAL STATEMENTS
31 DECEMBER 2025 (CONTINUED)

32. SEGMENT REPORTING (CONTINUED)

Business segments

	2025			2024		
	Malaysia RM'000	International RM'000	Total RM'000	Malaysia RM'000	International RM'000	Total RM'000
Revenue	279,955	46,106	326,061	265,604	39,246	304,850
Gross profit	197,747	23,784	221,531	201,426	19,659	221,085
Segment profit	95,989	6,867	102,856	103,560	4,638	108,198
Depreciation and amortisation	(14,075)	(380)	(14,455)	(15,550)	(864)	(16,414)
Impairment of computer software	(2,733)	-	(2,733)	-	-	-
Finance costs	(9,567)	-	(9,567)	(9,975)	-	(9,975)
Finance income	264	39	303	190	15	205
Share of profits of associates	27,617	8,685	36,302	22,536	8,087	30,623
Realised and unrealised (losses)/gains on foreign exchange - net	(314)	(58)	(372)	(59)	(124)	(183)
Profit before taxation	97,181	15,153	112,334	100,702	11,752	112,454
Tax expense	(5,496)	(2,439)	(7,935)	(5,144)	(1,414)	(6,558)
Profit for the financial year	91,685	12,714	104,399	95,558	10,338	105,896
Segment assets	590,565	231,537	822,102	672,064	201,249	873,313
Other disclosures						
Non-cash item* (other than depreciation and amortisation)	3,809	548	4,357	2,080	119	2,199
Capital expenditure arising from:						
- acquisition of subsidiaries	-	-	-	-	-	-
- property, plant and equipment, ROU assets and intangible assets additions	14,431	64	14,495	56,466	78	56,544

* Included in non-cash items are (reversal of)/allowance for impairment of receivables - net, unrealised (gains)/losses on foreign exchange, share-based payment expenses, and impairment of computer software.

NOTES TO THE FINANCIAL STATEMENTS

31 DECEMBER 2025 (CONTINUED)

32. SEGMENT REPORTING (CONTINUED)

Geographical segments

Non-current assets

Non-current assets are determined according to the country of the location of the assets. Non-current assets exclude financial instruments and deferred tax assets.

	2025 RM'000	2024 RM'000
Malaysia	502,377	592,638
Thailand	150,976	151,874
Indonesia	1,821	2,011
The Philippines	26,537	29,557
	681,711	776,080

Borrowings and lease liabilities

	2025 RM'000	2024 RM'000
Malaysia	124,092	187,052

Information about a major customer

There is no single customer that contributed 10% or more of the Group's revenue throughout the reported financial years.

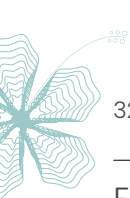
33. SUBSEQUENT EVENTS

On 29 January 2026, the Company declared a fourth interim single-tier tax-exempt dividend of 0.860 sen per ordinary shares amounting to RM19.6 million in respect of the financial year ended 31 December 2025 which will be paid on 28 April 2026.

The financial statements for the financial year ended 31 December 2025 do not reflect these dividends. Upon declaration, the cash dividend payment will be accounted for in equity as an appropriation of retained earnings during the financial year ending 31 December 2026.

34. AUTHORISATION FOR ISSUE OF FINANCIAL STATEMENTS

The financial statements have been authorised for issue by the Board of Directors in accordance with a resolution of the Directors on 24 April 2026.



FINANCIAL STATEMENTS

STATEMENT BY DIRECTORS PURSUANT TO SECTION 251(2) OF THE COMPANIES ACT 2016

We, Dato' Noorazman bin Abd Aziz and Ankur Sehgal, two of the Directors of CTOS Digital Berhad, do hereby state that, in the opinion of the Directors, the accompanying financial statements set out on pages 225 to 327 are drawn up so as to give a true and fair view of the financial position of the Group and of the Company as at 31 December 2025 and financial performance and cash flows of the Group and of the Company for the financial year ended 31 December 2025 in accordance with the Malaysian Financial Reporting Standards, International Financial Reporting Standards and the requirements of the Companies Act 2016 in Malaysia.

Signed by the Board in accordance with a resolution of the Directors dated 24 April 2026.

DATO' NOORAZMAN BIN ABD AZIZ
DIRECTOR

ANKUR SEHGAL
DIRECTOR

Kuala Lumpur

STATUTORY DECLARATION PURSUANT TO SECTION 251(1) OF THE COMPANIES ACT 2016

I, Tan Ming Yew, the Officer primarily responsible for the financial management of CTOS Digital Berhad, do solemnly and sincerely declare that the financial statements set out on pages 225 to 327 are, to the best of my knowledge and belief, correct, and I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the Statutory Declarations Act, 1960.

TAN MING YEW
(MIA No.: 33563)

Subscribed and solemnly declared by the abovenamed at Kuala Lumpur before me, on 24 April 2026.

Before me,

COMMISSIONER FOR OATHS

FINANCIAL STATEMENTS

INDEPENDENT AUDITORS' REPORT

TO THE MEMBERS OF CTOS DIGITAL BERHAD (CONTINUED)

(Incorporated in Malaysia) Registration No. 201401025733 (1101823-A)

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTSOur opinion

In our opinion, the financial statements of CTOS Digital Berhad (“the Company”) and its subsidiaries (“the Group”) give a true and fair view of the financial position of the Group and of the Company as at 31 December 2025, and of their financial performance and their cash flows for the financial year then ended in accordance with Malaysian Financial Reporting Standards, International Financial Reporting Standards and the requirements of the Companies Act 2016 in Malaysia.

What we have audited

We have audited the financial statements of the Group and of the Company, which comprise the statements of financial position as at 31 December 2025 of the Group and of the Company, and the statements of comprehensive income, statements of changes in equity and statements of cash flows of the Group and of the Company for the financial year then ended, and notes to the financial statements, including a summary of material accounting policies, as set out on pages 225 to 327.

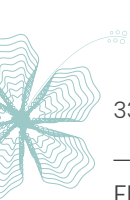
Basis for opinion

We conducted our audit in accordance with approved standards on auditing in Malaysia and International Standards on Auditing. Our responsibilities under those standards are further described in the “Auditors’ responsibilities for the audit of the financial statements” section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence and other ethical responsibilities

We are independent of the Group and of the Company in accordance with the By-Laws (on Professional Ethics, Conduct and Practice) of the Malaysian Institute of Accountants (“By-Laws”) and the International Ethics Standards Board for Accountants’ International Code of Ethics for Professional Accountants (including International Independence Standards) (“IESBA Code”), as applicable to audits of financial statements of public interest entities and we have fulfilled our other ethical responsibilities in accordance with the By-Laws and the IESBA Code.



FINANCIAL STATEMENTS

INDEPENDENT AUDITORS’ REPORT
TO THE MEMBERS OF CTOS DIGITAL BERHAD (CONTINUED)
 (Incorporated in Malaysia) Registration No. 201401025733 (1101823-A)

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS (CONTINUED)

Our audit approach

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the financial statements of the Group and of the Company. In particular, we considered where the Directors made subjective judgements; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all of our audits, we also addressed the risk of management override of internal controls, including among other matters, consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

We tailored the scope of our audit in order to perform sufficient work to enable us to provide an opinion on the financial statements as a whole, taking into account the structure of the Group and of the Company, the accounting processes and controls, and the industry in which the Group and the Company operate.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the Group and of the Company for the current financial year. These matters were addressed in the context of our audit of the financial statements of the Group and of the Company as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key audit matters	How our audit addressed the key audit matters
<p>Assessment on carrying value of goodwill</p> <p><i>Refer to Note 3(e)(i) - Summary of material accounting policies: Intangible assets - Goodwill, Note 4(c) - Critical accounting estimates and judgements: Intangible assets - Goodwill and Note 13 - Intangible assets</i></p> <p>As at 31 December 2025, the total carrying values of the Group’s goodwill allocated to the four cash generating units (“CGUs”) identified at the Malaysia and International operations segment amounted to RM102.9 million.</p> <p>The Group is required to test goodwill for impairment annually based on the requirements of MFRS 136 “Impairment of Assets”. Based on the annual impairment test performed, the Directors concluded that no impairment is required. The key assumptions and sensitivities are disclosed in Note 13 to the financial statements.</p>	<p>We performed the following audit procedures on the value-in-use (“VIU”) calculations:</p> <ul style="list-style-type: none"> • Assessed the appropriateness of the CGUs to which goodwill is allocated in accordance with MFRS 136 ‘Impairment of Assets’; • Checked the mathematical accuracy of the five-year VIU cash flows and agreed the cash flows to the financial budget for 2026 approved by the Directors and projections for the next five years; • Discussed with management on the key assumptions used in the five-year VIU cash flows which include the revenue growth rate, EBITDA margin, discount rate and terminal growth rate; • Assessed the reliability of management’s estimates by comparing the historical forecast for 2025 to actual results; • Compared the revenue growth rates and EBITDA margins in the projection periods to historical results and understand management’s forecasts of revenue and cost components to derive the revenue growth and EBITDA margin;

INDEPENDENT AUDITORS' REPORT

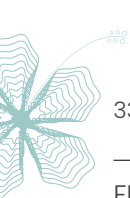
TO THE MEMBERS OF CTOS DIGITAL BERHAD (CONTINUED)

(Incorporated in Malaysia) Registration No. 201401025733 (1101823-A)

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS (CONTINUED)

Key audit matters (continued)

Key audit matters	How our audit addressed the key audit matters
<p>We focused on this area as the estimation of the recoverable amount requires significant assumptions and judgements on the future cash flows. Key assumptions include revenue growth rate, earnings before interest, taxes, depreciation and amortisation ("EBITDA") margin, terminal growth rate and discount rate.</p>	<ul style="list-style-type: none"> • Checked the reasonableness of the discount rate and terminal growth rate with the assistance of our valuation experts by benchmarking to entities with similar risk profiles and market information; and • Performed sensitivity analysis on revenue growth rate, EBITDA margin, terminal growth rate and discount rate. <p>Based on the procedures performed above, we did not find any material exceptions to the Directors' conclusion that the goodwill is not impaired as at 31 December 2025.</p>
<p>Assessment of funding requirements and ability to meet short term obligations</p> <p><i>Refer to Note 27(b) - Financial risk management: Liquidity risk</i></p> <p>As at 31 December 2025, the Company was in a net current liabilities position of RM68.5 million which was mainly contributed by the Company's borrowings and advances from subsidiaries as at 31 December 2025.</p> <p>Cash flow forecasts for the 12 months period after the year end were prepared taking into account the operational requirements and capital commitments of the Company. Based on the assessment, there are sufficient cash flows to enable the Company to meet their liabilities as and when they fall due and to carry out its operations without a significant curtailment of operations. As at 31 December 2025, the Company have access to undrawn borrowing facilities amounting to RM50.0 million.</p> <p>We focused on this area due to the inherent uncertainties and the judgement taken by management in forecasting future cash flows and determining the availability of funding to fund the operations of the Company for the next 12 months from the date of the financial statements.</p>	<p>We performed the following audit procedures:</p> <ul style="list-style-type: none"> • Checked management's cash flow forecasts for the Company to the annual budget approved by the Directors and extended up to 12 months from the date of the financial statements, which includes operating, investing and financing cash flows; • Discussed with management on key assumptions used in the cash flow forecasts for the Company; • Checked the borrowing repayment terms of the Company against the loan agreements; • Checked the extent of undrawn borrowing facilities available to the Company; and • Reviewed management's assessment of compliance with debt covenants. <p>Based on the procedures performed above, we did not find any material exceptions to the Directors' assessment that the Company will be able to meet their short-term obligations.</p>



FINANCIAL STATEMENTS

INDEPENDENT AUDITORS' REPORT
TO THE MEMBERS OF CTOS DIGITAL BERHAD (CONTINUED)
(Incorporated in Malaysia) Registration No. 201401025733 (1101823-A)

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS (CONTINUED)

Information other than the financial statements and auditors' report thereon

The Directors of the Company are responsible for the other information. The other information comprises the Directors' Report and Statement of Risk Management and Internal Control, but does not include the financial statements of the Group and of the Company and our auditors' report thereon.

Our opinion on the financial statements of the Group and of the Company does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements of the Group and of the Company, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements of the Group and of the Company or our knowledge obtained in the audit or otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Authors' responsibilities of the Directors for the financial statements

The Directors of the Company are responsible for the preparation of the financial statements of the Group and of the Company that give a true and fair view in accordance with Malaysian Financial Reporting Standards, International Financial Reporting Standards and the requirements of the Companies Act 2016 in Malaysia. The Directors are also responsible for such internal control as the Directors determine is necessary to enable the preparation of financial statements of the Group and of the Company that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements of the Group and of the Company, the Directors are responsible for assessing the Group's and the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Directors either intend to liquidate the Group or the Company or to cease operations, or have no realistic alternative but to do so.

INDEPENDENT AUDITORS' REPORT

TO THE MEMBERS OF CTOS DIGITAL BERHAD (CONTINUED)

(Incorporated in Malaysia) Registration No. 201401025733 (1101823-A)

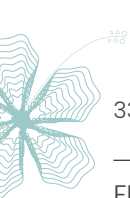
REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS (CONTINUED)

Auditors' responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements of the Group and of the Company as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with approved standards on auditing in Malaysia and International Standards on Auditing will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with approved standards on auditing in Malaysia and International Standards on Auditing, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- (a) Identify and assess the risks of material misstatement of the financial statements of the Group and of the Company, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- (b) Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's and of the Company's internal control.
- (c) Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors.
- (d) Conclude on the appropriateness of the Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's or on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements of the Group and of the Company or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group or the Company to cease to continue as a going concern.



FINANCIAL STATEMENTS

INDEPENDENT AUDITORS' REPORT

TO THE MEMBERS OF CTOS DIGITAL BERHAD (CONTINUED)

(Incorporated in Malaysia) Registration No. 201401025733 (1101823-A)

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS (CONTINUED)Auditors' responsibilities for the audit of the financial statements (continued)

- (e) Evaluate the overall presentation, structure and content of the financial statements of the Group and of the Company, including the disclosures, and whether the financial statements of the Group and of the Company represent the underlying transactions and events in a manner that achieves fair presentation.
- (f) Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the Group financial statements. We are responsible for the direction, supervision and review of the audit work performed for purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with the Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the Directors with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with the Directors, we determine those matters that were of most significance in the audit of the financial statements of the Group and of the Company for the current financial year and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

FINANCIAL STATEMENTS

INDEPENDENT AUDITORS' REPORT

TO THE MEMBERS OF CTOS DIGITAL BERHAD (CONTINUED)

(Incorporated in Malaysia) Registration No. 201401025733 (1101823-A)

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

In accordance with the requirements of the Companies Act 2016 in Malaysia, we report that the subsidiaries of which we have not acted as auditors, are disclosed in Note 14 to the financial statements.

OTHER MATTERS

This report is made solely to the members of the Company, as a body, in accordance with Section 266 of the Companies Act 2016 in Malaysia and for no other purpose. We do not assume responsibility to any other person for the content of this report.

PRICEWATERHOUSECOOPERS PLT
LLP0014401-LCA & AF 1146
Chartered Accountants

Kuala Lumpur
24 April 2026

CHAN SUET LYE
03603/10/2027 J
Chartered Accountant

FINANCIAL STATEMENTS

SHARIAH SCREENING DISCLOSURE

DISCLOSURE OF FINANCIAL DATA FOR SHARIAH SCREENING

Pursuant to Paragraph 9.25A of the Main Market Listing Requirements, below are the financial data of the Group relevant for Shariah screening by the Shariah Advisory Council (SAC) of the Securities Commission Malaysia. (pp. 1, 3)

(A) Group Total Income and Total Assets

Description	2025 (RM)	2024 (RM)
Revenue	326,060,773	304,850,688
Other income	529,678	1,250,318
Others (gain on disposal of investment in associate)	17,903,000	-
Finance income	303,276	204,921
Share of result of associates	36,301,577	30,622,888
Group Total Income	381,098,304	336,928,815
Total Assets	822,102,558	873,314,484

(B) Business Activities

Shariah Non-Compliant Activities	2025 (RM)	2024 (RM)
Interest income (conventional banks)	204,681	154,414
Total	204,681	154,414

(C) Component of Financial Position

(i) Cash Component

Description	2025 (RM)	2024 (RM)
Islamic Accounts / Instruments		
Bank accounts (RHB Islamic / Maybank Islamic)	3,055,245	2,477,699
Deposits (RHB Commodity Murabahah Deposit-i)	30,000,000	-
	33,055,245	2,477,699
Conventional Accounts / Instruments		
Cash at bank (excluding cash in hand)	27,202,340	16,885,376
	27,202,340	16,885,376

SHARIAH SCREENING DISCLOSURE

DISCLOSURE OF FINANCIAL DATA FOR SHARIAH SCREENING (CONTINUED)

(C) Component of Financial Position (continued)

(ii) Debt Component

Islamic Financing	Remarks	2025 (RM)	2024 (RM)
Current			
Commodity Financing	Commodity Murabahah Term Financing	38,576,302	33,654,715
Revolving Credit and Financing	Commodity Murabahah Revolving Credit	-	26,500,000
Non-Current			
Commodity Financing	Commodity Murabahah Term Financing	65,476,127	104,816,311
Total		104,052,428	164,971,026

This information is extracted from the Audited Financial Statements and follows the prescribed format of the Securities Commission Malaysia. (p. 3)

SECTION 9

STAKEHOLDER INFORMATION

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STAKEHOLDER INFORMATION

ANALYSIS OF SHAREHOLDINGS

AS AT 9 APRIL 2026

Class of Shares	:	Ordinary Shares
Total Number of Issued Shares	:	2,290,530,800 Ordinary Shares (including 15,450,000 treasury shares)
Number of Treasury Shares	:	15,450,000 Ordinary Shares
Voting Rights	:	One vote per ordinary share

DISTRIBUTION OF SHAREHOLDINGS

(As per Record of Depositors)

Size of Holdings	No. of Shareholders	% [^]	No. of Shareholders	% [^]
1 - 99	100	0.664	1,668	0.000
100 – 1,000	3,497	23.254	2,161,295	0.094
1,001 – 10,000	7,479	49.734	35,777,283	1.572
10,001 – 100,000	3,310	22.010	107,795,617	4.738
100,001 – 113,754,039(*)	649	4.315	1,398,497,009	61.470
113,754,040 and above (**)	3	0.019	730,847,928	32.124
TOTAL	15,038	100.000	2,275,080,800	100.000

Notes:

(*) Less than 5% of issued shares

(**) 5% and above of issued shares

[^] Computation of percentage of shareholdings is based on total number of issued shares in CTOS Digital Berhad excluding 15,450,000 Ordinary Shares bought back by the Company and retained as treasury shares as at 9 April 2026.

SUBSTANTIAL SHAREHOLDERS

(As per Register of Substantial Shareholders)

No.	Name of Shareholders	No. of Shares			
		Direct Interest	% [^]	Indirect Interest	% [^]
1.	Jade Vine Sdn. Bhd.	460,521,000	20.242	-	-
2.	Creador V L.P.	-	-	460,521,000 ¹	20.242
3.	Employees Provident Fund Board	516,701,863	22.711	-	-
4.	ABRDN Malaysia Sdn. Bhd.	-	-	376,536,700 ²	16.550
5.	ABRDN Holdings Limited	-	-	380,134,400 ³	16.709
6.	Aberdeen Group PLC (Formerly known as ABRDN PLC)	-	-	380,134,400 ⁴	16.709
7.	Kumpulan Wang Persaraan (Diperbadankan)	11,477,800	0.505	206,904,600 ⁵	9.094

Notes:

[^] Computation of percentage of shareholdings is based on total number of issued shares in CTOS Digital Berhad excluding 15,450,000 Ordinary Shares bought back by the Company and retained as treasury shares as at 1 April 2026.

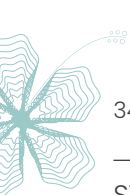
¹ Deemed interest through shares held by Jade Vine Sdn. Bhd. pursuant to Section 8(4) of the Companies Act 2016.

² Deemed interest through shares held by the registered holder which is a custodian appointed by one or more funds managed by ABRDN Malaysia Sdn. Bhd.

³ Deemed interest through shares held by the registered holder who is a custodian appointed by one or more funds managed by one or more subsidiaries of ABRDN Holdings Limited pursuant to Section 8(4)(c) of the Companies Act 2016.

⁴ Deemed interest through shares held by the registered holder who is a custodian appointed by one or more funds managed by one or more subsidiaries of Aberdeen Group PLC (Formerly known as ABRDN PLC) pursuant to Section 8(4)(c) of the Companies Act 2016.

⁵ Deemed interest through shares held by the registered holder who is a fund manager appointed by one or more funds managed by Kumpulan Wang Persaraan (Diperbadankan) pursuant to Section 8 of the Companies Act 2016



STAKEHOLDER INFORMATION

ANALYSIS OF SHAREHOLDINGS

AS AT 9 APRIL 2026

DIRECTORS' SHAREHOLDINGS

(As per Register of Directors' Shareholdings)

No.	Name of Shareholders	No. of Shares			
		Direct Interest	% [^]	Indirect Interest	% [^]
1.	Dato' Noorazman Bin Abd Aziz	-	-	-	-
2.	Lynette Yeow Su-Yin	300,000	0.013	-	-
3.	Nirmala A/P Doraisamy	-	-	-	-
4.	Su Puay Leng	300,000	0.013	-	-
5.	Ankur Sehgal	-	-	-	-
6.	Mizran Bin Md Nahar	359,400	0.016	-	-
	TOTAL	959,400	0.042	-	-

Notes:

[^] Computation of percentage of shareholdings is based on total number of issued shares in CTOS Digital Berhad excluding 15,450,000 Ordinary Shares bought back by the Company and retained as treasury shares as at 9 April 2026.

LIST OF TOP 30 HOLDERS

No.	Name of Shareholders	HOLDINGS	% [^]
1.	RHB Capital Nominees (Tempatan) Sdn Bhd Pledged Securities Account for Jade Vine Sdn Bhd	460,521,000	20.241
2.	Citigroup Nominees (Tempatan) Sdn Bhd Kumpulan Wang Persaraan (Diperbadankan) (Aberdeen)	140,035,300	6.155
3.	Citigroup Nominees (Tempatan) Sdn Bhd Employees Provident Fund Board	130,291,628	5.726
4.	Citigroup Nominees (Tempatan) Sdn Bhd Employees Provident Fund Board (Islamic)	101,682,135	4.469
5.	Citigroup Nominees (Tempatan) Sdn Bhd Employees Provident Fund Board (ABERDEEN)	90,985,100	3.999
6.	Citigroup Nominees (Tempatan) Sdn Bhd Employees Provident Fund Board (AHAM AM)	79,983,200	3.515
7.	Citigroup Nominees (Tempatan) Sdn Bhd Employees Provident Fund Board (ABERISLAMIC)	72,627,200	3.192
8.	Lembaga Tabung Haji	65,752,800	2.890
9.	CIMSEC Nominees (Tempatan) Sdn Bhd CIMB for Chung Tze Keong (PB)	42,984,400	1.889
10.	Citigroup Nominees (Tempatan) Sdn Bhd Urusharta Jamaah Sdn. Bhd. (Aberdeen 2)	40,827,600	1.794
11.	Citigroup Nominees (Tempatan) Sdn Bhd Urusharta Jamaah Sdn. Bhd. (2)	38,731,357	1.702
12.	Citigroup Nominees (Tempatan) Sdn Bhd Kumpulan Wang Persaraan (Diperbadankan) (ABDN EQ ABSR FD)	32,061,500	1.409
13.	Citigroup Nominees (Tempatan) Sdn Bhd Great Eastern Life Assurance (Malaysia) Berhad (Non Par 16)	27,000,000	1.186

STAKEHOLDER INFORMATION

ANALYSIS OF SHAREHOLDINGS

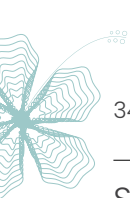
AS AT 9 APRIL 2026

LIST OF TOP 30 HOLDERS

No.	Name of Shareholders	HOLDINGS	% [^]
14.	HSBC Nominees (Asing) Sdn Bhd HSBC BK PLC for EAM Long-Only Emerging Markets Master Fund Limited	25,305,100	1.112
15.	HSBC Nominees (Asing) Sdn Bhd JPMCB NA for Vanguard Total International Stock Index Fund	24,879,900	1.093
16.	Hong Leong Assurance Berhad As Beneficial Owner (Life Par)	24,257,400	1.066
17.	HSBC Nominees (Asing) Sdn Bhd JPMCB NA for Vanguard Emerging Markets Stock Index Fund	22,037,100	0.968
18.	Citigroup Nominees (Tempatan) Sdn Bhd Kumpulan Wang Persaraan (Diperbadankan) (AHAM AM EQ)	21,234,900	0.933
19.	Citigroup Nominees (Tempatan) Sdn Bhd Exempt an for Bank of Singapore Limited (Local)	20,737,700	0.911
20.	CIMB Group Nominees (Tempatan) Sdn Bhd CIMB Bank Berhad (EDP 2)	19,347,400	0.850
21.	JCL Credit Leasing Sdn Bhd	16,500,000	0.725
22.	Amanahraya Trustees Berhad Amanah Saham Bumiputera 2	16,063,700	0.706
23.	Permodalan Nasional Berhad	15,402,000	0.676
24.	Lee Kar Whatt	14,481,400	0.636
25.	Citigroup Nominees (Tempatan) Sdn Bhd Employees Provident Fund Board (Nomura)	12,569,800	0.552
26.	HSBC Nominees (Asing) Sdn Bhd JPMCB NA for Vanguard Fiduciary Trust Company Institutional Total International Stock Market Index Trust II	11,752,000	0.516
27.	Chinchoo Investment Sdn.Berhad	11,700,000	0.514
28.	Key Development Sdn.Berhad	11,695,800	0.514
29.	Citigroup Nominees (Tempatan) Sdn Bhd Great Eastern Life Assurance (Malaysia) Berhad (SHF)	11,000,000	0.483
30.	Kumpulan Wang Persaraan (Diperbadankan)	10,977,800	0.482
TOTAL		1,613,425,220	70.917

Notes:

[^] Computation of percentage of shareholdings is based on total number of issued shares in CTOS Digital Berhad excluding 15,450,000 Ordinary Shares bought back by the Company and retained as treasury shares as at 9 April 2026.



STAKEHOLDER INFORMATION

NOTICE OF 2026 ANNUAL GENERAL MEETING

NOTICE IS HEREBY GIVEN THAT the 2026 Annual General Meeting of CTOS Digital Berhad (“**CTOS Digital**” or the “**Company**”) (“**AGM**”) will be held physically at **Corporate Meetings by Envivo, Ground Floor, Lobby 1, Crystal Plaza, No. 4, Jalan 51A/223, 46100 Petaling Jaya, Selangor on Thursday, 25 June 2026 at 9.30 a.m.** to transact the following businesses:-

AGENDA**Ordinary Business**

- | | |
|---|---|
| 1. To receive the Audited Financial Statements for the financial year ended 31 December 2025 together with the Reports of the Directors and Auditors thereon. | (Please refer to Explanatory Note 1) |
| 2. To re-elect Lynette Yeow Su-Yin who retires pursuant to Clause 76(3) of the Company’s Constitution. | (Ordinary Resolution 1) |
| 3. To re-elect Ankur Sehgal who retires pursuant to Clause 78 of the Company’s Constitution. | (Ordinary Resolution 2) |
| 4. To re-elect Mizran Bin Md Nahar who retires pursuant to Clause 78 of the Company’s Constitution. | (Ordinary Resolution 3) |
| 5. To approve the payment of Directors’ fees for an amount not exceeding RM635,000.00 for the period from 26 June 2026 until the next AGM of the Company. | (Ordinary Resolution 4) |
| 6. To approve the payment of Directors’ benefits for an amount not exceeding RM16,000.00 for the period from 26 June 2026 until the next AGM of the Company. | (Ordinary Resolution 5) |
| 7. To re-appoint PricewaterhouseCoopers PLT as Auditors of the Company and to authorise the Directors to fix their remuneration. | (Ordinary Resolution 6) |

Special Business

To consider and, if thought fit, to pass, with or without modifications, the following Ordinary Resolution of the Company:-

- | | |
|--|--------------------------------|
| 8. PROPOSED RENEWAL OF AUTHORITY FOR SHARE BUY-BACK | (Ordinary Resolution 7) |
|--|--------------------------------|

“THAT subject always to the Companies Act 2016 (“the Act”), the Constitution of the Company, the Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“Bursa Securities”) (“Listing Requirements”) and all other applicable laws, guidelines, rules and regulations, the Company be and is hereby authorised, to the fullest extent permitted by law, to purchase such number of issued shares in the Company as may be determined by the Directors of the Company from time to time through Bursa Securities upon such terms and conditions as the Directors may deem fit and expedient in the interest of the Company provided that:

- (i) the aggregate number of issued shares in the Company (“Shares”) purchased (“Purchased Shares”) and/or held as treasury shares pursuant to this ordinary resolution does not exceed ten per centum (10%) of the total number of issued shares of the Company as quoted on Bursa Securities as at point of purchase; and
- (ii) the maximum fund to be allocated by the Company for the purpose of purchasing the shares shall not exceed the aggregate of the retained profits of the Company based on the latest audited financial statements and/or the latest management accounts (where applicable) available at the time of the purchase,

(“Proposed Share Buy-Back”)

NOTICE OF 2026 ANNUAL GENERAL MEETING

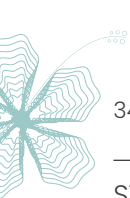
8. AND THAT the authority to facilitate the Proposed Share Buy-Back will commence immediately upon passing of this Ordinary Resolution and will continue to be in force until:

- (i) the conclusion of the next Annual General Meeting of the Company following at which time the authority shall lapse unless by ordinary resolution passed at the meeting, the authority is renewed, either unconditionally or subject to conditions;
- (ii) the expiration of the period within which the next annual general meeting of the Company is required by law to be held; or
- (iii) revoked or varied by ordinary resolution passed by the shareholders of the Company at a general meeting,

whichever occurs first but shall not prejudice the completion of purchase(s) by the Company of its own Shares before the aforesaid expiry date and, in any event, in accordance with the Listing Requirements and any applicable laws, rules, regulations, orders, guidelines and requirements issued by any relevant authorities.

AND THAT the Directors of the Company be and are hereby authorised, at their discretion, to deal with the Purchased Shares until all the Purchased Shares have been dealt with by the Directors in the following manner as may be permitted by the Act, Listing Requirements, applicable laws, rules, regulations, guidelines, requirements and/or orders of any relevant authorities for the time being in force:

- (i) To cancel all or part of the Purchased Shares;
- (ii) To retain all or part of the Purchased Shares as treasury shares as defined in Section 127 of the Act;
- (iii) To distribute all or part of the treasury shares as dividends to the shareholders of the Company;
- (iv) To resell all or part of the treasury shares;
- (v) To transfer all or part of the treasury shares for the purposes of or under the employees' share scheme established by the Company and/or its subsidiaries;
- (vi) To transfer all or part of the treasury shares as purchase consideration;
- (vii) To sell, transfer or otherwise use the shares for such other purposes as the Minister may by order prescribe; and/or
- (viii) To deal with the treasury shares in any other manners as allowed by the Act, Listing Requirements, applicable laws, rules, regulations, guidelines, requirements and/or orders of any relevant authorities for the time being in force.



STAKEHOLDER INFORMATION

NOTICE OF 2026 ANNUAL GENERAL MEETING

AND THAT the Directors of the Company be and are authorised to take all such steps as are necessary or expedient [including without limitation, the opening and maintaining of central depository account(s) under Securities Industry (Central Depositories) Act, 1991, and the entering into all other agreements, arrangements and guarantee with any party or parties] to implement, finalise and give full effect to the Proposed Share Buy-Back with full powers to assent to any conditions, modifications, variations and/or amendments (if any) as may be imposed by the relevant authorities.”

9. To transact any other business of which due notice shall have been given in accordance with the Companies Act 2016.

By Order of the Board

KOOI EE LIN
MAICSA7066158
SSM PC No. 201908001822

NG CHEONG SENG
MIA17444
SSM PC No. 202408000584

Company Secretaries
Kuala Lumpur

Dated: 30 April 2026

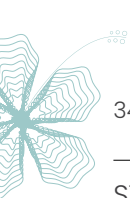
NOTICE OF 2026 ANNUAL GENERAL MEETING

Notes:

1. For the purpose of determining who shall be entitled to attend this General Meeting, the Company shall be requesting Bursa Malaysia Depository Sdn Bhd to make available to the Company, the Record of Depositors as of 16 June 2026. Only a member whose name appears on this Record of Depositors shall be entitled to attend this General Meeting or appoint a proxy to attend, speak and vote on his/her/its behalf.
2. A member entitled to attend and vote at this General Meeting is entitled to appoint a proxy or attorney or in the case of a corporation, to appoint a duly authorised representative to attend, participate, speak and vote in his place. A proxy may but need not be a member of the Company.
3. A member of the Company who is entitled to attend and vote at a General Meeting of the Company may appoint not more than two (2) proxies to attend, participate, speak and vote instead of the member at the General Meeting.
4. Where a member of the Company is an authorised nominee as defined in the Securities Industry (“Central Depositories”) Act 1991 (“Central Depositories Act”), it may appoint not more than two (2) proxies in respect of each securities account it holds in ordinary shares of the Company standing to the credit of the said securities account.
5. Where a member of the Company is an exempt authorised nominee which holds ordinary shares in the Company for multiple beneficial owners in one securities account (“omnibus account”), there is no limit to the number of proxies which the exempt authorised nominee may appoint in respect of each omnibus account it holds. An exempt authorised nominee refers to an authorised nominee defined under the Central Depositories Act which is exempted from compliance with the provisions of Section 25A(1) of the Central Depositories Act.
6. Where a member appoints more than one (1) proxy, the proportion of shareholdings to be represented by each proxy must be specified in the instrument appointing the proxies.
7. The appointment of a proxy may be made in a hard copy form or by electronic means in the following manner and must be received by the Company not less than forty-eight (48) hours before the time appointed for holding the General Meeting or adjourned general meeting at which the person named in the appointment proposes to vote:
 - (i) In hard copy form

The original Proxy Form and the power of attorney or other authority, if any, under which it is signed or a notarially certified or office copy of that power or authority shall be deposited at the Company’s Share Registrar, Tricor Investor & Issuing House Services Sdn Bhd (“Tricor”) at Unit 32-01, Level 32, Tower A, Vertical Business Suite, Avenue 3, Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia or alternatively to be deposited in the drop-box located at Unit G-3, Ground Floor, Vertical Podium, Avenue 3, Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia.
 - (ii) By electronic means

The Proxy Form can be electronically lodged with Tricor via Vistra Share Registry and IPO (MY) portal at <https://srmy.vistra.com>. Please follow the procedures set out in the Administrative Notes.
8. For a corporate member who has appointed an authorised representative, please deposit the **original** certificate of appointment of corporate representative with Tricor at the address stated in Note 7(i) above, before the time appointed for holding this general meeting or adjourned meeting.
9. Last date and time for lodging the Proxy Form is **Tuesday, 23 June 2026 at 9.30 a.m.**
10. Shareholders are advised to check the Company’s website and announcements from time to time for any changes to the administration of the 2026 AGM.



STAKEHOLDER INFORMATION

NOTICE OF 2026 ANNUAL GENERAL MEETING

EXPLANATORY NOTES ON ORDINARY BUSINESS**1. Agenda item No. 1 – Audited Financial Statements for the Financial Year Ended 31 December 2025**

The Audited Financial Statements is meant for discussion only as an approval from shareholders is not required pursuant to the provision of Section 340(1) of the Companies Act 2016. Hence, this item on the Agenda is **not put forward for voting** by shareholders of the Company.

2. Ordinary Resolutions 1 to 3 – Re-election of Directors

Please refer to the Statement Accompanying the Notice of AGM for information.

Ms Su Puay Leng who is due for retirement by rotation pursuant to Clause 76(3) of the Company's Constitution has indicated to the Company that she would not seek for re-election at the 2026 AGM. Therefore, Ms Su Puay Leng will retire as a Director of the Company upon the conclusion of the 2026 AGM.

3. Ordinary Resolutions 4 and 5 – Payment of Directors' Fees and Benefits

Pursuant to Section 230(1) of the Companies Act 2016, the fees of the directors and any benefits payable to the directors of a listed company and its subsidiaries shall be approved at a general meeting.

The Proposed Ordinary Resolution 4 is to facilitate the payment of Directors' fees calculated based on the current board size for the period from 26 June 2026 until the next AGM of the Company. In the event the Directors' fees proposed are insufficient (due to enlarged Board size), approval will be sought at the next AGM for additional fees to meet the shortfall.

The Proposed Ordinary Resolution 5 for the Directors' Benefits are meeting allowances for the Board Investment Committee ("BIC") and Employee Share Option Scheme ("ESOS") Committee or such other board committee(s) established by the Board from time to time. Meeting allowances are calculated based on the estimated number of meetings to be held for the period from 26 June 2026 until the next AGM of the Company. In the event the proposed amount is insufficient (e.g., due to additional meetings), approval will be sought at the next AGM for additional amount to meet the shortfall.

4. Ordinary Resolution 6 – Re-appointment of Auditors

The Board, through the Audit Committee ("AC") has considered the re-appointment of PricewaterhouseCoopers PLT ("PwC") as the Auditors of the Company. The factors considered by the AC in making the recommendation to the Board to table the re-appointment of PwC at the 2026 AGM are disclosed in the Corporate Governance Overview Statement of this Integrated Annual Report.

EXPLANATORY NOTES ON SPECIAL BUSINESS**5. Ordinary Resolution 7 – Proposed Renewal of Authority for Share Buy-Back**

Ordinary Resolution 7, if passed, will empower the Company to purchase up to ten per centum (10%) of the issued share capital of the Company through Bursa Malaysia Securities Berhad.

For further information, please refer to the Statement to Shareholders dated 30 April 2026.

STAKEHOLDER INFORMATION

STATEMENT ACCOMPANYING

NOTICE OF ANNUAL GENERAL MEETING

Pursuant to Paragraph 8.27(2) of the Main Market Listing Requirements of Bursa Malaysia Securities Berhad

ELECTION/ APPOINTMENT AS DIRECTORS

There are no individuals standing for election/appointment as Directors at the 2026 Annual General Meeting (“AGM”).

Lynette Yeow Su-Yin, Ankur Sehgal and Mizran Bin Md Nahar (“Retiring Directors”) are standing for re-election as Directors of the Company and being eligible, have offered themselves for re-election at the 2026 AGM. Their profiles are set out on pages 161 to 163 of the 2025 Annual Report. The details of their interest in the securities of the Company can be found on page 340 of the 2025 Annual Report.

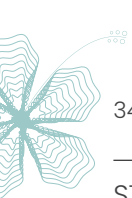
The Board of Directors (“Board”) has through the Nomination and Remuneration Committee (“NRC”), considered the assessment of Lynette Yeow Su-Yin that was conducted in accordance with the Director Assessment Framework and agreed that she met the criteria as prescribed by Paragraph 2.20A of the Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“MMLR”) on character, experience, integrity, competence and time to effectively discharge her role as Director. The Board has also through the NRC, satisfied that Ankur Sehgal and Mizran Bin Md Nahar met the criteria as prescribed by Paragraph 2.20A of the MMLR on character, experience, integrity, competence and time to effectively discharge their roles as Directors. The Retiring Directors have also met the relevant requirements under the fit and proper assessment and confirmed that they do not have any conflict of interest, potential conflict of interest or perceived conflict of interest, including interest in any business that is in competition with the Group other than as disclosed to the Board (if any), in relation to the recurrent related party transactions pursuant to Paragraph 10.09 of the MMLR.

Mizran Bin Md Nahar shall be deemed interested in the recurrent related party transactions of a revenue or trading nature (“RRPT”) to be entered into with the related parties, set out below:-

- i. Provision of Credit Management Suite and Financial Surveillance & Compliance services by CTOS Data Systems Sdn Bhd (“CDS”) to Creador Sdn Bhd (“Creador”).
- ii. Sale of Basis Credit Reports by CTOS Basis Sdn Bhd (“BASIS”) to Creador.

Note:

- (1) Mizran Bin Md Nahar is under the employment of Creador and was nominated by Jade Vine Sdn Bhd as a director of CTOS Digital Berhad (“CDB”). Mizran Bin Md Nahar is a shareholder of CDB and also a director of CDS. As such, Creador is a person connected to Mizran Bin Md Nahar and Mizran Bin Md Nahar is hence deemed interested in the above RRPT.



STAKEHOLDER INFORMATION

STATEMENT ACCOMPANYING NOTICE OF ANNUAL GENERAL MEETING

The NRC and the Board had also undertaken an assessment on the independence of Lynette Yeow Su-Yin, who is an Independent Non-Executive Director of the Company.

In addition to the above, the Board (save for the Retiring Directors who have abstained from deliberation on discussions relating to their own re-election) supports and recommended the re-election of Lynette Yeow Su-Yin, Ankur Sehgal and Mizran Bin Md Nahar as Directors of the Company based on the following:-

1. Lynette Yeow Su-Yin

Ms Lynette was appointed as the Independent Non-Executive Director of the Company on 1 October 2020. She is a lawyer by profession and has over 28 years of experience specialising in corporate and securities laws, mergers and acquisitions and capital markets. The Board is of the view that the Group has benefited from having Ms Lynette on the Board given her experience and constructive comments made during the Board meetings.

2. Ankur Sehgal

Mr Ankur Sehgal was appointed as Group Chief Executive Officer of the Company on 16 January 2026. Subsequently, he was appointed as the Executive Director of the Company on 31 March 2026. Mr Ankur Sehgal has 20 years of leadership experience in digital banking, product and strategy, retail credit, risk management, data and analytics. His career spans across Singapore, Malaysia, Philippines, Vietnam, Cambodia, and the United States, with a strong record of building digital businesses, scaling fast-growing financial institutions, establishing risk management frameworks and strengthening the credit ecosystems across the region. The Board is of the view that his extensive leadership experience will benefit the Group and support its long-term growth and value.

3. Mizran Bin Md Nahar

Mr Mizran was appointed as an Alternate Director of the Company to the former Director, Mr Loh Kok Leong on 24 July 2024. Subsequently, he ceased as Alternate Director following the resignation of Mr Loh Kok Leong with effect from 31 March 2026 and was appointed as the Non-Independent Non-Executive Director of the Company on the same day. He has over 10 years working experience in equity capital markets, mergers and acquisitions and general investment across Southeast Asia. The Board is of the view that the Group will benefit from having Mr Mizran on the Board given his skills and experience.

GENERAL MANDATE FOR ISSUE OF SECURITIES

The Company did not issue any shares pursuant to the general mandate granted to the Directors at the 2025 AGM and is not seeking shareholders' approval for a general mandate for the issuance of securities at the 2026 AGM.

STAKEHOLDER INFORMATION

ADMINISTRATIVE NOTES

2026 ANNUAL GENERAL MEETING (2026 AGM) ADMINISTRATIVE NOTES

Day and Date	:	Thursday, 25 June 2026
Time	:	9:30 a.m.
Venue	:	Corporate Meetings by Envivo, Ground Floor, Lobby 1, Crystal Plaza, No. 4, Jalan 51A/223, 46100 Petaling Jaya, Selangor

VENUE ADDRESS

Corporate Meetings by Envivo
Ground Floor, Lobby 1, Crystal Plaza
No.4, Jalan 51A/223
46100 Petaling Jaya, Selangor

By LRT:

Get down at Asia Jaya LRT Station
Our venue is about 150 metres walk from the station.

By Bus:

Get down at PJ436 – Asia Jaya LRT Bus Stop
Our venue is about 150 metres walk from the bus stop

By Own Car:

Open Maps and search “Corporate Meetings by Envivo”
Or click on this link : <https://maps.app.goo.gl/ALfxKqaCiY8Yd5B3A>

Drive into Crystal Plaza, parking is available underground.
Our venue is at Crystal Plaza, Lobby 1, Ground Floor

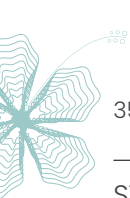
REGISTRATION

The registration counter starts at 8:30 a.m. on Thursday, 25 June 2026 and will remain open until the conclusion of the 2026 AGM or such time as may be determined by the Chairman of the Meeting.

Shareholders or proxies are requested to produce/show their original MyKAD or Passport (for non-Malaysians) to the registration staff for verification purposes. Please ensure the original MyKAD or Passport is returned to you thereafter.

Please take note that no person will be allowed to register on behalf of another person, even with the original MyKAD or Passport of that person.

Upon verification, shareholders or proxies will also be given the identification wristbands for voting purposes. No person will be allowed to enter the meeting hall without the identification wristband. There will be no replacement for the identification wristband if it is lost or misplaced.



STAKEHOLDER INFORMATION

ADMINISTRATIVE NOTES

PROXY

Only a member whose name appears on the Record of Depositors as at 16 June 2026 shall be entitled to attend and vote or appoint proxy/proxies to attend and vote on his/her/its behalf at the 2026 AGM.

If you are unable to attend the meeting on Thursday, 25 June 2026, you may appoint proxy(ies) or the Chairman of the Meeting as proxy and indicate the voting instructions in the Proxy Form. If you wish to personally participate in the 2026 AGM yourself, please do not submit any Proxy Form. You will not be allowed to participate in the 2026 AGM together with the proxy appointed by you.

The instrument appointing a proxy and the power of attorney or other authority, if any, in writing shall be signed by the appointor or his/her attorney duly authorised in writing or, if the appointor is a corporation, either under its common seal in accordance with the constitution of the corporation or under the hand of at least two (2) authorised officers, one of whom shall be a Director, or of its attorney duly authorised or any director and/or authorised officers in accordance with the laws of the country under which the corporation is incorporated. Any alteration to the instrument appointing a proxy must be initialed.

The instrument appointing a proxy and the power of attorney or other authority, if any, under which it is signed or a notarially certified copy of that power or authority must be deposited or submitted in the following manner not later than Tuesday, 23 June 2026 at 9:30 a.m.:

i. In hard copy form

By hand or post to the office of the Company's Share Registrar at Unit 32-01, Level 32, Tower A, Vertical Business Suite, Avenue 3, Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur, W.P. Kuala Lumpur, Malaysia or alternatively to be deposited in the drop box located at Unit G-3, Ground Floor, Vertical Podium, Avenue 3, Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia.

ii. By electronic form

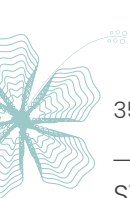
You may also submit your proxy appointment electronically via Vistra Share Registry and IPO (MY) portal at <https://srmy.vistra.com>. Please do read and follow the procedures below to submit proxy form electronically.

ELECTRONIC LODGEMENT OF PROXY FORM

No.	PROCEDURE	ACTION
i.	Steps for Individual Shareholders	
	Register as a User with Vistra Share Registry and IPO (MY)	<ol style="list-style-type: none">1. Visit the Portal at https://srmy.vistra.com.2. Click "Register" and select "Individual Holder" and complete the New User Registration Form.3. For guidance, you may refer to the tutorial guide available on the homepage.4. Once registration is completed, you will receive an email notification to verify your registered email address.5. After verification, your registration will be reviewed and approved within one (1) working day. A confirmation email will be sent once approved.6. Once you receive the confirmation, activate your account by creating your password. <p>If you are an existing user with the Portal or our Tricor Investor & Issuing House Service Sdn. Bhd. (Tricor) Online portal previously, you are not required to register again.</p>

STAKEHOLDER INFORMATION
ADMINISTRATIVE NOTES

No.	PROCEDURE	ACTION
	Proceed with submission of form of proxy	<ol style="list-style-type: none"> 1. After the release of the Notice of Meeting by the Company, login with your email address and password. 2. Select the corporate event: CTOS DIGITAL BERHAD 2026 AGM. 3. Navigate to the 3 dots at the end of the corporate event and choose SUBMISSION OF PROXY FORM. 4. Read and agree to the Terms and Conditions and confirm the Declaration. 5. Indicate the total number of shares assigned to your proxy(s) to vote on your behalf. 6. Appoint your proxy(ies) and insert the required details of your proxy(ies) or appoint the Chairman as your proxy. 7. Indicate your voting instructions FOR or AGAINST or ABSTAIN. 8. Print the proxy form for your record.
ii.	Steps for Corporate or Institutional shareholders	
	Register as a User with Vistra Share Registry and IPO (MY)	<ol style="list-style-type: none"> 1. Visit the portal at https://srmy.vistra.com. 2. Click "Register" and select "Representative of Corporate Holder" and complete the New User Registration Form. 3. Complete the registration form with your personal details. 4. Once registration is completed, you will receive an email notification to verify your registered email address. 5. After verification, your registration will be reviewed and approval within two (2) working days. A confirmation email will be sent once approved. 6. Once you receive the confirmation, activate your account by creating your password. <p>(Note: The representative of a corporation or institutional shareholder must register as a user in accordance with the above steps before he/she can subscribe to this corporate holder electronic proxy submission. Please contact Tricor if you need clarifications on the user registration.)</p>
	Proceed with submission of form of proxy	<ol style="list-style-type: none"> 1. Login to https://srmy.vistra.com with your email address and password. 2. Select the corporate event: CTOS DIGITAL BERHAD 2026 AGM. 3. Navigate to the icon ">" at the end of the corporate event. 4. Read and agree to the Terms and Conditions and confirm the Declaration. 5. Select the corporate holder's name. 6. Proceed to download the submission file. 7. Prepare the file for the appointment of proxy(ies) by inserting the required data. 8. Proceed to upload the duly completed proxy appointment file. 9. Select "Confirm" to complete your submission. 10. Print the confirmation report of your submission for your record.



STAKEHOLDER INFORMATION

ADMINISTRATIVE NOTES

GENERAL MEETING RECORD OF DEPOSITORS

For the purpose determining who shall be entitled to attend the 2026 AGM, the Company will be requesting Bursa Malaysia Depository Sdn. Bhd. to issue a General Meeting Record of Depositors as at 16 June 2026 and only a depositor whose name appears on such Record of Depositors shall be entitled to attend the said meeting.

NO RECORDING OR PHOTOGRAPHY

No recording or photography of the 2026 AGM proceedings is allowed without prior written permission of the Company.

POLL VOTING

The voting at the 2026 AGM will be conducted by poll in accordance with Paragraph 8.29A of the Main Market Listing Requirements of Bursa Malaysia Securities Berhad. The Company has appointed Tricor as Poll Administrator to conduct the poll by way of electronic voting.

Shareholders or proxies or corporate representatives or attorneys can proceed to vote on the resolutions upon the announcement by the Chairman of the Meeting.

Upon completion of the voting session for the 2026 AGM, the Scrutineers will verify the poll results followed by the Chairman's declaration whether the resolutions are duly passed.

REFRESHMENT

Please be informed that light refreshments will be provided.

ANNUAL REPORT 2025

The Company's Annual Report 2025 is available at:

- The Company's website at www.ctosdigital.com
- Bursa Malaysia's website at www.bursamalaysia.com under the Company's announcements.

As part of our sustainability initiatives, we encourage you to refer to the digital version.

Should you require a printed copy, please request it at <https://smy.vistra.com> and select "Request for Annual Report / Circular" under "Investor Services". The printed copy will be mailed to you as soon as reasonably practicable.

ENQUIRY

If you have any enquiry prior to the meeting, you may contact the Share Registrar during office hours, on Mondays to Fridays, from 9.00 a.m. to 5.30 p.m. (except public holidays) at:

Tricor Investor & Issuing House Services Sdn Bhd

Telephone Number	General Line	603-2783 9299
Email	is.enquiry@vistra.com	

ctos

PROXY FORM

CDS Account No.

No. of Shares Held

I/We _____ Tel: _____
 [Full name in block, NRIC/Passport/Company No.]

of _____

being member(s) of **CTOS DIGITAL BERHAD** ("CTOS Digital" or the "Company"), hereby appoint:

Full Name (in Block)	NRIC/Passport No.	Proportion of Shareholdings	
		No. of Shares	%
Address			

and / or* (*delete as appropriate)

Full Name (in Block)	NRIC/Passport No.	Proportion of Shareholdings	
		No. of Shares	%
Address			

or failing him/her, the Chairman of the Meeting as my/our proxy(ies) to vote for me/us and on my/our behalf at the 2026 Annual General Meeting of CTOS Digital which will be held physically at **Corporate Meetings by Envivo, Ground Floor, Lobby 1, Crystal Plaza, No. 4, Jalan 51A/223, 46100 Petaling Jaya, Selangor** on **Thursday, 25 June 2026 at 9.30 a.m.** and at any adjournment thereof, and to vote as indicated below:-

My/Our proxy is to vote as indicated below:

No.	Agenda	Resolution	For	Against
1	To re-elect Lynette Yeow Su-Yin who retires pursuant to Clause 76(3) of the Company's Constitution.	Resolution 1		
2	To re-elect Ankur Sehgal who retires pursuant to Clause 78 of the Company's Constitution.	Resolution 2		
3	To re-elect Mizran Bin Md Nahar who retires pursuant to Clause 78 of the Company's Constitution.	Resolution 3		
4	To approve the payment of Directors' fees for an amount not exceeding RM635,000.00 for the period from 26 June 2026 until the next AGM of the Company.	Resolution 4		
5	To approve the payment of Directors' benefits for an amount not exceeding RM16,000.00 for the period from 26 June 2026 until the next AGM of the Company.	Resolution 5		
6	To re-appoint PricewaterhouseCoopers PLT as Auditors of the Company and to authorise the Directors to fix their remuneration.	Resolution 6		
7	To approve the renewal of Authority for Share Buy-Back	Resolution 7		

Please indicate with an "X" in the space provided whether you wish your votes to be cast for or against the resolutions. In the absence of specific direction, your proxy will vote or abstain as he thinks fit.

Signed this _____ day of _____, 2026

Signature*
Member

* Manner of execution:

- If you are an individual member, please sign where indicated.
- If you are a corporate member which has a common seal, this proxy form should be executed under seal in accordance with the constitution of your corporation.
- If you are a corporate member which does not have a common seal, this proxy form should be affixed with the rubber stamp of your company (if any) and executed by:
 - at least two (2) authorised officers, of whom one shall be a director; or
 - any director and/or authorised officers in accordance with the laws of the country under which your corporation is incorporated.

Notes:

1. For the purpose of determining who shall be entitled to attend this General Meeting, the Company shall be requesting Bursa Malaysia Depository Sdn Bhd to make available to the Company, the Record of Depositors as of 16 June 2026. Only a member whose name appears on this Record of Depositors shall be entitled to attend this General Meeting or appoint a proxy to attend, speak and vote on his/her/its behalf.
2. A member entitled to attend and vote at this General Meeting is entitled to appoint a proxy or attorney or in the case of a corporation, to appoint a duly authorised representative to attend, participate, speak and vote in his place. A proxy may but need not be a member of the Company.
3. A member of the Company who is entitled to attend and vote at a General Meeting of the Company may appoint not more than two (2) proxies to attend, participate, speak and vote instead of the member at the General Meeting.
4. Where a member of the Company is an authorised nominee as defined in the Securities Industry ("Central Depositories") Act 1991 ("Central Depositories Act"), it may appoint not more than two (2) proxies in respect of each securities account it holds in ordinary shares of the Company standing to the credit of the said securities account.
5. Where a member of the Company is an exempt authorised nominee which holds ordinary shares in the Company for multiple beneficial owners in one securities account ("omnibus account"), there is no limit to the number of proxies which the exempt authorised nominee may appoint in respect of each omnibus account it holds. An exempt authorised nominee refers to an authorised nominee defined under the Central Depositories Act which is exempted from compliance with the provisions of Section 25A(1) of the Central Depositories Act.
6. Where a member appoints more than one (1) proxy, the proportion of shareholdings to be represented by each proxy must be specified in the instrument appointing the proxies.

Please fold here

Affix
Stamp

CTOS DIGITAL BERHAD

Registration No : 201401025733
(1101823-A)

c/o **Tricor Investor & Issuing House Services Sdn Bhd**

Unit 32-01, Level 32, Tower A
Vertical Business Suite, Avenue 3
Bangsar South, No. 8 Jalan Kerinchi
59200 Kuala Lumpur

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7. The appointment of a proxy may be made in a hard copy form or by electronic means in the following manner and must be received by the Company not less than forty-eight (48) hours before the time appointed for holding the General Meeting or adjourned general meeting at which the person named in the appointment proposes to vote.
 - (i) In hard copy form

The original Proxy Form and the power of attorney or other authority, if any, under which it is signed or a notarially certified or office copy of that power or authority shall be deposited at the Company's Share Registrar, Tricor Investor & Issuing House Services Sdn Bhd ("Tricor") at Unit 32-01, Level 32, Tower A, Vertical Business Suite, Avenue 3, Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia or alternatively to be deposited in the drop-box located at Unit G-3, Ground Floor, Vertical Podium, Avenue 3, Bangsar South, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia.
 - (ii) By electronic means

The Proxy Form can be electronically lodged with Tricor via Vistra Share Registry and IPO (MY) portal at <https://srmy.vistra.com>. Please follow the procedures set out in the Administrative Notes.
8. For a corporate member who has appointed an authorised representative, please deposit the **original** certificate of appointment of corporate representative with Tricor at the address stated in Note 7(i) above, before the time appointed for holding this general meeting or adjourned meeting.
9. Last date and time for lodging the Proxy Form is **Tuesday, 23 June 2026 at 9.30 a.m.**

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Registration No: 201401025733 (1101823-A)

Level 17, Menara CelcomDigi.
No 6, Persiaran Barat, Seksyen 52,
Petaling Jaya, 46200 Selangor, Malaysia.

Tel : 03-2722 8800

E-mail : IR@ctos.com.my

Bursa: 5301

Bloomberg: 5301 :MK

Reuters: CTOS: KL

Syariah Compliant