

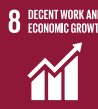
SOCIAL RESPONSIBILITY

9 LABOUR PRACTICE & STANDARDS

Related UNSDGs



Goal 3:
Good Health & Wellbeing



Goal 8:
Decent Work & Economic Growth



Goal 10:
Reduced Inequality



Goal 16:
Peace, Justice & Strong Institute

Why Is It Important

At Tropicana, building townships goes beyond physical development. It involves the collective effort of employees, contractors, and workers across our project sites, and we recognise our responsibility to ensure that everyone involved in delivering our developments is treated with respect and dignity.

We believe that responsible labour practices are fundamental to sustaining trust, protecting worker welfare, and maintaining the integrity of our developments. Poor labour practices can lead to regulatory consequences, project disruptions, and reputational harm, but more importantly, they undermine the values we stand for as a responsible developer.

Our commitment to human rights reflects our broader purpose of building sustainable communities, guided by our Tropicana DNA and our ESG pillars of People, Planet and Partnership.

OUR APPROACH

Our approach to labour standards and human rights is guided by recognised international principles and applicable Malaysian laws, and is implemented through policies, site-level practices, contractor expectations, and monitoring arrangements appropriate to construction activities.

[Human Rights Principles & Policy Framework](#)

Tropicana's commitment to human rights is formalised through our Human Rights Policy, which is publicly available on the Group's website and applies across Tropicana and its subsidiaries.

This policy affirms our commitment to uphold internationally recognised human rights standards, including:

- United Nations Guiding Principles on Business and Human Rights
- International Labour Organization Declaration on Fundamental Principles and Rights at Work International Bill of Human Rights
- Applicable Malaysian labour laws and employment regulations

These principles guide how we manage our workforce and how we engage contractors, suppliers and business partners.

Our Human Rights Policy establishes clear commitments to:

- Prohibit forced labour, child labour and all forms of exploitation
- Uphold fair and lawful employment practices
- Provide safe and respectful working environments
- Promote equality, non-discrimination and fair treatment
- Protect worker dignity and freedom of movement

This policy applies not only to Tropicana employees but also informs our expectations of contractors and suppliers operating across our project sites. Further details of supplier-related expectations are discussed in the Procurement Practices section of this Sustainability Statement.

Governance

Oversight of labour standards and human rights is integrated within Tropicana's sustainability governance framework, reflecting our responsibility as a township developer to ensure that workforce welfare is appropriately managed across our developments. The Board of Directors and relevant Board Committees provide oversight through the Group's governance structure, while day-to-day implementation is carried out by the Sustainability, Human Resources, Procurement, Operations and Project teams within their respective roles.

As a developer, Tropicana does not directly employ most construction workers but works closely with appointed contractors and consultants to ensure labour standards and human rights expectations are understood and implemented at project sites. These expectations are communicated during contractor onboarding, mobilisation planning and site briefings, and reinforced through ongoing project supervision and engagement. Where labour-related concerns arise, they are escalated through established reporting channels for review and appropriate follow-up.

We also engage with contractors, suppliers and industry partners to strengthen awareness and capability in responsible and sustainable practices, recognising that labour standards, human rights and broader sustainability risks are closely interconnected. This is particularly relevant as climate change may affect worker safety, health and productivity, especially in construction environments exposed to heat, weather variability and site conditions.

For example, in November 2025, Tropicana collaborated with the UN Global Compact Network Malaysia & Brunei and Alliance Bank Malaysia Berhad to host a Climate Action Workshop involving more than 30 Small and Medium Enterprises ("SMEs"). While focused on climate readiness, the programme also supported suppliers in strengthening their overall ESG practices, including governance, workforce management and responsible business conduct.

Salient Human Rights Risks in Construction Activities

Across our developments, we recognise that labour and human rights risks may arise through the workforce engaged by contractors and suppliers.

Key areas of focus include:

- Recruitment practices, including prevention of inappropriate recruitment fees or coercive practices
- Working hours, fatigue management and fair working conditions
- Timely and fair payment of wages in accordance with legal requirements
- Workers' access to their personal identification documents and freedom of movement
- Accommodation standards, where housing is provided
- Respectful workplace conduct, including prevention of bullying, harassment or intimidation
- Access to grievance and reporting channels for workers across project sites

These areas form part of our oversight focus and inform our policies, contractor expectations and site management practices.

Human Rights Risk Assessment & Monitoring

We assess human rights and labour risks on an ongoing basis as part of project mobilisation and site operations. This includes considering workforce composition, labour sourcing arrangements and contractor practices, recognising that construction activities involve multiple employers and supply chain partners.

Labour-related risks associated with contractors and suppliers are also reviewed through our procurement due diligence and project oversight processes. This includes assessing contractor capability, compliance track record and adherence to our expectations on labour standards, as described in the Procurement Practices section of this Sustainability Statement.

As part of this approach, we reference internationally recognised indicators, including the 11 forced labour indicators published by the International Labour Organisation ("ILO"), to guide awareness, monitoring and escalation where necessary.

Where gaps or concerns are identified, we engage the relevant contractors or partners to seek clarification and appropriate corrective actions, within the scope of our contractual rights and operational oversight.

Labour Practices

These practices apply to our employees and are communicated as expectations to contractors and subcontractors operating at our project sites.

Policy Area	Details
Equal Pay for Equal Work	We uphold fair pay practices where compensation is based on job responsibilities, qualifications, and performance, free from unlawful bias. This is reflected in our internal expectations and communicated as part of workforce governance.
Non-Discrimination and Equal Opportunity	We prohibit discrimination based on race, religion, gender, age, sexual orientation, disability, or nationality. Expectations are embedded in our company code, and concerns may be raised through reporting channels.
Recruitment Practices and Fees	Recruitment arrangements that may give rise to forced labour concerns, including inappropriate recruitment fees charged to workers, are not permitted. Where labour suppliers are used, recruitment-related expectations are communicated as part of contractor requirements.
Working Hours and Overtime	We comply with statutory working hours, overtime limits, and rest requirements. Working hours and overtime patterns are monitored at site level to manage fatigue and compliance risks, and issues are followed up through engagement with relevant parties.
Wages (Minimum Wage and Fair Pay)	We comply with statutory minimum wage requirements. Fair wage practices are encouraged among contractors and suppliers, recognising the multi-party workforce structure typical in construction.
Working and Living Conditions	Construction sites are managed in line with occupational safety and health requirements (covered separately in this report). Where worker accommodation is provided, it is required to meet minimum legal standards.
Personal Documents	Withholding of passports or other personal identity documents is not permitted. Workers are expected to retain control over their personal documents, and any concerns identified are addressed through engagement with the relevant employer or contractor.
Workplace Conduct (Bullying and Harassment)	We maintain zero tolerance for bullying, harassment, intimidation, threats, or violence at sites or premises. Reporting channels are available, and supervisors are expected to manage concerns promptly and appropriately. Key human resources managers are also trained to handle workplace conduct concerns and ensure that reports are reviewed and addressed in accordance with the Group's policies and procedures.
Medical Access	Access to medical care and required insurance coverage is maintained for work-related incidents, recognising the nature of construction work and the need for timely treatment.
Communication and Awareness	Human rights and labour expectations are communicated to employees and contractors through onboarding, site briefings, and procurement engagement processes. Managers and supervisors are expected to understand reporting routes and handling procedures.
Freedom of Movement	Workers are expected to have freedom of movement outside working hours, subject to lawful and reasonable site safety requirements. Restrictions that may indicate forced labour risk are not permitted.

Freedom of Association

We respect employees' rights to freedom of association and collective representation in accordance with applicable labour laws. Employees may choose to join trade unions or worker representative bodies where such arrangements exist.

As at FY2025, a total of 25 employees within the Group were members of a registered trade union. In addition to formal representation structures, Tropicana maintains direct engagement with employees through supervisors, management communication channels and internal reporting mechanisms.

Grievance & Whistleblowing Mechanisms

We maintain formal grievance and whistleblowing channels to allow employees, contractor personnel, suppliers, and external stakeholders to raise concerns relating to labour standards, human rights, or workplace conduct. These mechanisms form an important part of our human rights due diligence framework.

Given the multi-party nature of development and construction activities, these channels provide an important safeguard to ensure concerns can be raised beyond direct employer reporting lines where appropriate. They are accessible to employees, contractors, local communities and supply chain workers through our employee portal and corporate website.

Concerns may be submitted confidentially or anonymously and are reviewed in accordance with Tropicana's established grievance and whistleblowing procedures. Where issues relate to contractor or subcontractor workforce practices, Tropicana engages the relevant employer or project party to investigate and implement corrective actions where required, consistent with our role and contractual responsibilities.

These mechanisms support early identification of potential issues, reinforce accountability across our project sites, and strengthen our commitment to ensuring that all workers contributing to Tropicana developments are treated with dignity and respect.

Further details on our whistleblowing channel are provided in the Corporate Governance section of this Sustainability Statement.

OUR PERFORMANCE

During the reporting periods, no material labour standards or human rights non-compliance incidents were recorded.

Performance Indicator	Unit	FY2025	FY2024	FY2023	Target
Labour standards regulatory non-compliance incidents ¹	Number	Nil	Nil	Nil	Maintain zero incidents
Substantiated human rights violations ²	Number	Nil	Nil	Nil	Maintain zero cases
Monetary losses arising from labour or human rights legal proceedings ³	RM	Nil	Nil	Nil	Avoid monetary losses arising from labour or human rights legal proceedings

1. Labour standards regulatory non-compliance incidents refer to confirmed breaches of labour laws or employment regulations (e.g. wages, working hours, statutory requirements) involving Tropicana employees, contractors or subcontractor workers at project sites that have come to management's attention.
2. Substantiated human rights violations refer to confirmed cases of discrimination, harassment, forced labour indicators or other human rights breaches identified through grievance, whistleblowing or management reporting channels.
3. Monetary losses refer to fines, penalties, settlements or compensation arising from labour or human rights-related legal or regulatory proceedings.