

Responses for BNM CCPT Due Diligence Checklist – FY2025

This due diligence checklist covers Environmental Risks under 5 categories:

- 1) General
- 2) Pollution
- 3) Ecosystem & Biodiversity
- 4) Efficient Use of Resources
- 5) GHG Emissions

No.	Questions		Respond (Y / N / NA)	Remarks
BNM DUE DILIGENCE QUESTIONS: GP3 – NO SIGNIFICANT HARM TO THE ENVIRONMENT				
1.0	General			
1.1a	Risk identification	Has there been any legal, compliance issues and/or complaints, negative coverage received from media/NGOs etc. associated with the Trust’s environmental performance in the last 3 years?	N	Sunway REIT has not encountered any such issues or negative coverage in the last 3 years.
1.2a	Risk management	Are there any remedial measures which have commenced or are on-going to address the identified issues or complaints above?	N	Sunway REIT worked diligently to ensure full compliance with all applicable environmental laws and regulations. The Manager adopts proactive approach to environmental management, guided by its robust sustainability policies and internal controls and regular compliance monitoring, to uphold its commitment to responsible asset management and sustainable development, while mitigating environmental risks and ensuring alignment with regulatory and stakeholder expectations. For more information, please refer to Sunway REIT’s Sustainability Report 2025, page 106.
2.0	Pollution			
2.1a	Risk identification	Are any of the Trust’s activities involved in the release, and/or use of: - Hazardous chemicals/materials; and/or - Waste/pollutants (other than the above) that cannot be recovered, reused, and/or disposed of in an environmentally sound manner?	Y	Yes, certain property segments within Sunway REIT’s portfolio generate hazardous waste, which consists of e-waste and clinical waste. In FY2025, clinical waste was generated by the Services segment and was disposed by an approved waste vendor that specialised in clinical waste management. The other segments have provided e-waste collection points. In FY2025, e-waste collected was sent for recycling. For more information, please refer to Sunway REIT’s Sustainability Report 2025, page 63-65.

2.2a	Risk management	Are there any remedial measures which have commenced or are on-going: - to avoid or reduce the use of hazardous chemicals/materials and waste/pollutants within the Trust's operations; and/or - which entail environmentally sound disposal mechanisms?	Y	All hazardous waste generated from Sunway REIT's managed properties is handled and disposed of through licensed waste contractors, in compliance with the Environmental Quality Act 1974. All disposal activities come along with proper monitoring and documentation to ensure traceability and effective environmental risk management. For more information, please refer to Sunway REIT's Sustainability Report 2025, page 63-65.
3.0	Ecosystem & Biodiversity			
3.1a	Risk identification	Are the Trust's operations located in or near environmentally sensitive areas ("ESAs") or key biodiversity areas ("KBAs") or does the Trust's operations create negative impacts on biodiversity and surrounding ecosystem?	NA	Sunway REIT's portfolio does not locate in or near ESAs or KBAs.
3.2a	Risk management	Are there any remedial measures which have commenced or are on-going on the protection and conservation of biodiversity and surrounding ecosystem which are impacted by the Trust's operations?	Y	The Manager aims to be a catalyst for other developments in the region by reducing the overall impact of the built environment on their surroundings, by focusing on preservation, conservation, restoration and rehabilitation. The Manager is guided by its Biodiversity Policy as its core principles of conduct, which apply to all its activities and businesses. For more information, please refer to the Sunway REIT's Biodiversity Policy available on Sunway REIT's website.
4.0	Efficient Use of Resources			
4.1a	Risk identification	Does the Trust's core activities involve significant consumption of: - Water - Energy - Natural resources (e.g. fossil fuel, minerals, timber, etc.)?	Y	Yes, Sunway REIT's core activities are considered energy- and water-intensive, due to the operational demands of its diversified portfolio, which includes retail malls, hotels, office buildings and industrial properties. These asset classes require significant energy for air-conditioning, lighting and building services, as well as substantial water usage for cooling systems, tenant operations and sanitation. Although Sunway REIT is not as water-intensive as manufacturing industry, water security and water quality remains vital to ensuring uninterrupted daily operations, particularly for its hotels and retail malls. For more information, please refer to Sunway REIT's Sustainability Report 2025, page 53-62.
4.2a	Risk management	Are there any remedial measures which have commenced or are on-going to monitor, reduce and improve efficiencies in resource consumption?	Y	Sunway REIT actively monitors and manages its resource consumption to minimise environmental impact and improve operational efficiency across its portfolio. Key initiatives include deployment in on-site solar photovoltaic panels and the procurement of solar energy

				via the Corporate Green Power Programme (CGPP) to support the Trust's transition to cleaner energy sources, along with continuous efforts to improve energy efficiency and strengthen water management across business operations. Apart from municipal potable water, Sunway REIT sourced fresh surface water from Sunway South Quay Lake at Sunway City Kuala Lumpur since 2019 to reduce reliance of municipal water supply for its properties located within the township. For more information, please refer to Sunway REIT's Sustainability Report 2025, page 58-62.
5.0	GHG Emissions			
5.1a	Risk identification	Do the Trust's core activities lead to significant greenhouse gas ("GHG") emissions?	Y	Yes, Sunway REIT's core activities do lead to significant GHG emissions, with the highest emissions generated by the Retail and Office segments due to their energy-intensive operations. In FY2025, emissions arising from tenant operations (Scope 3) across the Retail, Office, Hotel and Industrial & Others portfolio represented 69%, making this the largest contributor to the Trust's overall carbon footprint. For more information, please refer to Sunway REIT's Sustainability Report 2025, page 46-47.
5.2a	Risk management	Are there any remedial measures which have commenced or are on-going to reduce GHG emissions and/or in relation to de-carbonisation efforts?	Y	Yes, Sunway REIT has developed a Net Zero Carbon Emissions by 2050 Roadmap which sets out clear actions, interim milestones, and timelines to guide the transition and support informed decision-making and capital allocation. Key transition levers include improving energy efficiency across assets, deploying on-site solar photovoltaic systems, and increasing the procurement of renewable energy from the national grid. From pre-acquisition due diligence to targeted mechanical and electrical ("M&E") system upgrades across the portfolio, the Manager remains committed to delivering the 10-year Green Building roadmap while building resilience against rising energy costs and tightening energy-related regulations. In addition, the Manager addresses its Scope 3 emissions by implementing Green Lease Partnership Programme since 2022 to encourage collaborative effort with its tenants to actively reduce environmental impact within its properties. For more information, please refer to Sunway REIT's Sustainability Report 2025, page 35, 39-41, 43-44, and 50-65.

No.	Question	Respond (Y / N / NA)	Remarks
BNM DUE DILIGENCE QUESTIONS: GP4 – REMEDIAL MEASURES TO TRANSITION			
a	Has the Trust established time-bound remedial measures to address the specific significant harm identified?	Y	Energy considerations are integrated into refurbishment and asset enhancement planning to improve long-term asset efficiency, resilience to rising energy costs and alignment with evolving regulatory and market expectations, while supporting emissions reduction. Asset enhancement initiatives ("AEIs") are undertaken annually in a prioritised and disciplined manner to upgrade selected properties, enhance building performance and mitigate energy-related cost and regulatory risks. Apart from municipal potable water, Sunway REIT sourced fresh surface water from Sunway South Quay Lake at Sunway City Kuala Lumpur since 2019 to reduce reliance of municipal water supply for the properties located within the township. Water sourced from Sunway South Quay Lake decreased from 12% (369,474 m³) in FY2024 to 3% (84,017 m³) in FY2025 due to the ongoing upgrading works of Sunway water treatment plant since FY2024. For more information, please refer to Sunway REIT's Sustainability Report 2025, page 53-62.
b	How does the Trust plan to monitor the progress and effectiveness of the remedial measures against an appropriate set of performance evaluation criteria (including subsequent review conducted post-remediation), indicators and time-bound targets?	Y	Energy performance is monitored at the asset level using utility data and building management systems, enabling the identification of high consumption assets and prioritisation of improvement opportunities. Performance trends are reviewed periodically by management to inform operational adjustments and capital expenditure decisions, supporting disciplined resource allocation. While internal carbon pricing is implemented by the Sponsor, Sunway Berhad, at RM15 per tonne of CO₂e, the Business Unit Management Teams operating within Sunway REIT's managed portfolio are subjected to the internal carbon pricing mechanism if the building energy intensity targets are not met. For more information, please refer to Sunway REIT's Sustainability Report 2025, page 53-62.
c	Does the Trust have financial capacity and/or secured financing facilities to fund its remedial measures?	Y	Sunway REIT holds a portfolio of 28 assets across the retail, office, hotel and industrial & others' segments, where it generated gross revenue of RM894.3 million, net property income of RM658.0 million and realised profit for unitholders of RM451.2 million, respectively in FY2025. With gearing at 39.4%, the debt headroom available is approximately up to RM1.1 billion. The combination of realised profit and debt will be the source of fund for the remedial measures.