



# **RADIUM DEVELOPMENT BERHAD**

(Registration No. 201301009006 (1038848-V))

## **BIODIVERSITY POLICY**

| <b>VERSION</b> | <b>EFFECTIVE DATE</b> |
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## **1. Introduction**

Radium Development Berhad (“Radium” or “the Company”) is committed to integrating biodiversity conservation into its business activities. This Policy sets out the Company’s principles and strategies for protecting, restoring, and enhancing ecosystems where it operates. It reflects Radium’s intention to balance urban growth with ecological responsibility, while supporting Malaysia’s National Policy on Biological Diversity 2016 - 2025 and its updated framework 2022 – 2030, and contributing to relevant United Nations Sustainable Development Goals (“UN SDGs”).

## **2. Objective**

The objective of the Policy is to provide clear guidance on how Radium integrates biodiversity considerations across its operations to protect and enhance ecological value, while supporting sustainable urban growth. It reaffirms the Company’s commitment to environmental stewardship, long-term value creation, and strengthened resilience through sound Environmental, Social, and Governance (“ESG”) practices.

The Policy aims to:

- 2.1 Integrate biodiversity conservation principles into the Company’s business strategies, project planning, and design processes;
- 2.2 Promote biodiversity-friendly practices at all stages of development, including the use of native plant species, green infrastructure, and ecological landscaping;
- 2.3 Ensure that the Board of Directors (“the Board”) and senior management oversee the implementation of the Policy and periodically review biodiversity performance and outcomes; and
- 2.4 Foster a culture of biodiversity awareness and protection within the Company and its communities, embedding environmental considerations into decision-making and project delivery.

## **3. Scope**

This Policy applies to all projects and operations undertaken by Radium, including new developments, joint ventures, partnerships, and future expansions. It is applicable throughout the entire project lifecycle from site selection and planning to design, construction, and operational phases.

## **4. Policy Statement**

Radium is committed to protecting and enhancing biodiversity within its areas of operation. We recognise biodiversity as an essential component of environmental sustainability and

urban resilience. As a responsible property developer, Radium integrates biodiversity considerations into every phase of its development activities, from planning and design to construction and post-completion management.

Through the Policy, the Company seeks to minimise adverse impacts on natural ecosystems, promote the use of native and non-invasive plant species, apply nature-based design solutions, and foster environmental awareness among stakeholders and local communities. This commitment is aligned with Malaysia's National Policy on Biological Diversity 2016–2025 and its updated framework 2022 – 2030, and contributes to the achievement of relevant UN SDGs.

The Policy also supports Radium's Environmental, Social, and Governance Roadmap ("ESG Roadmap") adopted in September 2025 by aligning biodiversity management with the Company's short-, medium-, and long-term sustainability objectives. The ESG Roadmap is attached herein as Appendix 1.

In line with the ESG Roadmap, Radium will:

- (a) maintain at least 10% of total development areas as green spaces in all high-rise development in Kuala Lumpur; and
- (b) progressively enhance biodiversity outcomes by incorporating native vegetation, bird- and pollinator-friendly landscaping, and community green spaces into its developments.

## **5. Implementation**

Radium will implement the Policy through an integrated, cross-functional approach involving project planning, design, construction, and operational teams. The Corporate Affairs Department will lead the coordination of biodiversity efforts, supported by relevant departments and external stakeholders where appropriate.

Implementation of the Policy will involve the following core elements:

### **A. Governance and Accountability**

- The Corporate Affairs Department shall be the policy owner and primary driver of implementation.
- Project management department is responsible for embedding biodiversity considerations into project lifecycles.
- The Board and senior management will receive periodic updates on biodiversity-related risks, opportunities, and performance.

### **B. Capacity Building and Awareness**

- Employees, consultants, and contractors will be provided with relevant training and awareness programmes on biodiversity principles, design strategies, and compliance requirements.

- Community and resident engagement initiatives will be conducted to foster broader biodiversity stewardship.

### **C. Integration into Business Processes**

- Biodiversity assessments will be integrated into project feasibility studies, environmental due diligence, and design briefs.
- Project development processes will apply the Avoid–Reduce–Restore–Offset (ARRO) hierarchy to address biodiversity risks.
- Green infrastructure elements (e.g., native vegetation, bird- and pollinator-friendly landscaping, and community green spaces etc.) will be incorporated in planning and landscape design.

### **D. Monitoring, Reporting, and Continuous Improvement**

- Biodiversity performance will be tracked using defined Key Performance Indicators (KPIs), including the percentage of native species used, tree survival rates, and other biodiversity-related measures.
- Annual reporting will be conducted as part of the Company's sustainability disclosures.
- The Policy and its implementation mechanisms shall be reviewed every two (2) years or when there are material environmental or regulatory changes.

### **E. ESG Integration and Alignment**

- The Policy is closely aligned with the Company's ESG Roadmap to ensure biodiversity efforts contribute directly to Radium's broader environmental sustainability goals.
- Ensuring biodiversity initiatives directly support the environmental pillar's short- and medium-term objectives.
- Biodiversity initiatives shall align with the Company's ESG Roadmap targets:

#### **(i) Short-Term (<1 year):**

- Ensure a minimum of 10% green spaces\* from development areas in all high-rise developments in Kuala Lumpur.

*\* Green spaces refer to areas predominantly covered in vegetation such as grass, trees, and plants, set aside for recreation or conservation purposes.*

#### **(ii) Medium-Term (2-3 years):**

- To actively consider incorporating native tree species in landscape designs, wherever feasible and appropriate.
- To incorporate bird-attracting or nectar-producing plants in landscaping, guided by professional advice and site suitability.
- To build birdhouses or pollinator habitats at project sites where feasible.
- To sponsor community parks / gardens where feasible.

- Progress on these actions shall be disclosed annually in the Sustainability Report, consistent with the ESG Roadmap's environmental reporting commitments on waste, water, and resource use.

**Appendix 1 – Radium ESG Roadmap**

## ESG Roadmap – Environment

*The following roadmap outlines Radium's environment initiatives aimed at enhancing sustainability performance over the short, medium, and long term.*

| TIME HORIZON  | RADIUM   |
|---|--|
| <p><b>Short-term</b><br/>(&lt;1 Year)</p> <p>2026</p> | <p><b>Water Management</b></p> <ul style="list-style-type: none"> <li>• To disclose three years of water (effluent) discharge</li> </ul> <p><b>Material Used and Waste management</b></p> <ul style="list-style-type: none"> <li>• To maintain ongoing recycling practices for new developments, including centralised recycling with three (3) different bins at main refuse chambers, and to explore placing dedicated recycling bins on each floor to further encourage segregation at source.</li> <li>• To maintain collecting data to facilitate the disclosure of emissions (tonnes), hazardous and non- recycled waste generation (tonnes), waste recycled in the Sustainability Report</li> <li>• To maintain ongoing practices such as cutting rebar and BRC to size to reduce wastage, reuse construction materials such as timbers, and recycled materials such as steel and aluminium, actively incorporates system formwork (ex: Industrialized Building System (“IBS”) and dispose scheduled waste through an authorised third party</li> <li>• To disclose three (3) years of raw materials used</li> </ul> <p><b>Environmental Management &amp; Compliance</b></p> <ul style="list-style-type: none"> <li>• To disclose target for zero non-compliance case (environmental)</li> <li>• To evaluate EIA requirements and costs for each project, prioritising legally mandated or environmentally material projects, and disclose the approach in the Sustainability Report.</li> <li>• To maintain to disclose greenhouse gas (“GHG”) emissions data, energy and water usage on properties in Sustainability Report</li> <li>• To increase the proportion of projects with REHDA GreenRE Certification across the portfolio.</li> <li>• To provide sustainability policies to oversee material matters that includes biodiversity issues, integrate waste, water and resource use issues</li> </ul> |

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| TIME HORIZON                                  | RADIUM   |
|---|--|
| Short-term<br>(<1 Year)<br><br>2026 (Cont'd)  | <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>To provide more than 10% of <b>Green Spaces</b><sup>1</sup> from development areas in all High-Rise Developments in KL</li> </ul>  |
| Medium-term<br>(2-3 Years)<br><br>2027 – 2029 | <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>To actively consider incorporating native tree species in landscape designs, wherever feasible and appropriate.</li> <li>To incorporate bird-attracting or nectar-producing plants in landscaping, guided by professional advice and site suitability.</li> <li>To build birdhouses or pollinator habitats at project sites where feasible</li> <li>To sponsor community parks / gardens where feasible</li> </ul> <p><b>Environmental Supply Chain</b></p> <ul style="list-style-type: none"> <li>To set supplier selection criteria that require suppliers to commit to the protection of the environment, including prevention of pollution such as noise, waste</li> </ul> |
| Long-term<br><br>2030 onwards                 | <p><b>Emission Management</b></p> <ul style="list-style-type: none"> <li>To develop Net Zero by 2050 Roadmap which includes Scope 2 emissions reduction targets: 20% reduction by 2030, (vs. 2023 baseline) and 30% reduction by 2050 vs. 2023 baseline) – <i>actual targets to be confirmed at a later stage</i></li> </ul>   |

<sup>1</sup> Green Spaces: Areas predominantly covered in vegetation like grass, trees, and plants, and are set aside for recreation or conservation.

## ESG Roadmap – Social

*The following roadmap outlines Radium's social initiatives aimed at enhancing sustainability performance over the short, medium, and long term.*

| TIME HORIZON                                   | RADeUM   |
|--|--|
| <p>Short-term<br/>(&lt;1 Year)</p> <p>2026</p> | <p><b>Labor Practices &amp; Human Rights</b></p> <ul style="list-style-type: none"> <li>• To conduct internal audits to assess Radium's compliance with local labor laws and international standards</li> <li>• To roll out awareness and training programs for HR and operations teams on labor rights</li> </ul> <p><b>Employee Welfare</b></p> <ul style="list-style-type: none"> <li>• <i>Emergency preparedness</i>: To develop and roll out comprehensive emergency response plans, including fire drills, evacuation procedures, and crisis communication protocols</li> <li>• To increase OSH training hours: establish training baselines using FY2025 data and increase training for all levels of employees and contractors</li> <li>• To start aligning employment practices with best practices in fair recruitment, contract terms, and equal treatment</li> <li>• To create or strengthen grievance mechanisms and whistleblower channels for employee protection</li> <li>• To finetune Occupational Safety and Health Manual to incorporate the protection of the environment, where necessary</li> <li>• <i>Continuous training</i>: To introduce role-specific and high-risk task safety training, including mental health awareness and ergonomics</li> <li>• To ensure systems are in place to track wage compliance across all operations.</li> <li>• To monitor working hours and overtime compensation to ensure fairness and legal alignment (especially project overtime).</li> <li>• <i>Serious injuries goals</i>: To aim to eliminate workplace serious injuries by 2026 across all operations</li> </ul> |

## ESG Roadmap – Social

*The following roadmap outlines Radium's social initiatives aimed at enhancing sustainability performance over the short, medium, and long term.*

| TIME HORIZON   | RADIUM  |
|--|---|
| <p><b>Short-term</b><br/>(&lt;1 Year)</p> <p>2026</p> <p><i>(Cont'd)</i></p> | <p><b>Social Supply Chain</b></p> <ul style="list-style-type: none"> <li>• To inspect a minimum of 5% of major suppliers for compliance with environmental and social standards by 2026 (Confined to construction related suppliers)</li> </ul> <p><b>Data Privacy</b></p> <ul style="list-style-type: none"> <li>• To have a PDPA policy to address issues related to employees and contractors</li> </ul> <p><b>Community Engagement</b></p> <ul style="list-style-type: none"> <li>• To establish collaboration with NGOs such as Tzu-Chi Foundation Malaysia and Pertiwi Soup Kitchen</li> </ul> <p><b>Sustainable Design</b></p> <ul style="list-style-type: none"> <li>• To design development projects located within 500-1000 m of public transport (LRT/KTM/MRT/Bus) (where applicable)</li> </ul> |

## ESG Roadmap – Social

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| TIME HORIZON  | RADİUM  |
|---|---|
| <b>Medium-term<br/>(2-3 Years)</b><br><br>2027 – 2029 | <p><b>Risk management</b></p> <ul style="list-style-type: none"> <li><i>Enhanced risk assessments:</i> To conduct regular risk assessments and safety audits at corporate offices, sales galleries, and project offices, with actionable outcomes.</li> <li>To strengthen safety governance: implement stronger internal OSH (Occupational Safety and Health) governance structures and accountability frameworks</li> <li>To develop a transparent audit and reporting system for labor compliance within Radium's own operations</li> </ul> <p><b>Social Compliance</b></p> <ul style="list-style-type: none"> <li><i>Full legal compliance:</i> To achieve full compliance with national OSH laws and standards (e.g. OSHA 1994, FMA 1967)</li> </ul> <p><b>Social Supply Chain</b></p> <ul style="list-style-type: none"> <li>To achieve at least 40% of major suppliers' compliance with environmental and social standards by 2029</li> </ul> |

## ESG Roadmap – Social

*The following roadmap outlines Radium's social initiatives aimed at enhancing sustainability performance over the short, medium, and long term.*

| TIME HORIZON  | RADIUM   |
|---|--|
| <b>Long-term<br/>(&gt; 3 Years)</b><br><br>2030 onwards | <p><b>Employee Welfare</b></p> <ul style="list-style-type: none"> <li><i>Lead in inclusive employment:</i> To provide equitable opportunities for women, youth, and underserved groups.</li> <li>To continue disclosing labor practices and improvements in ESG Report.</li> <li><i>Well-being integration:</i> To integrate health and safety with broader employee well-being strategies (e.g., preventive care, mental health, and work-life balance initiatives).</li> </ul> <p><b>Sustainable Design</b></p> <ul style="list-style-type: none"> <li>To integrate key accessibility features for disabled persons across all developments, including parking bays, ramps, accessible lifts, OKU toilets, handrails, and adequate corridor widths, as feasible by project type and design.</li> </ul> |

## ESG Roadmap – Governance

*The following roadmap outlines Radium's governance initiatives aimed at enhancing sustainability performance over the short, medium, and long term.*

| TIME HORIZON                                  | RADiUM   |
|---|--|
| Short-term<br>(<1 Year)<br><br>2026           | <p><b>Supply Chain</b></p> <ul style="list-style-type: none"> <li>To integrate ESG performance into construction-related supplier selection and contracts by 2026</li> </ul> <p><b>Risk Management</b></p> <ul style="list-style-type: none"> <li>To integrate ESG risk assessments into all major business decisions by 2026</li> </ul>                           |
| Medium-term<br>(2-3 Years)<br><br>2027 – 2029 | <p><b>Supply Chain</b></p> <ul style="list-style-type: none"> <li>To achieve 25% strategic suppliers' compliance with ESG standards by 2027</li> </ul> <p><b>Risk Management</b></p> <ul style="list-style-type: none"> <li>To implement a ESG risk dashboard for monitoring of climate, regulatory, and supply chain risks across all projects by 2028</li> </ul> |
| Long-term<br><br>2030 onwards                 | <p><b>Supply Chain</b></p> <ul style="list-style-type: none"> <li>To achieve at least 50% strategic suppliers' compliance with ESG standards by 2030</li> </ul> <p><b>Risk Management</b></p> <ul style="list-style-type: none"> <li>To achieve full integration of ESG risk management into the Company's culture and operations by 2030</li> </ul>               |