STEEL HAWK BERHAD

Sustainability Statement FY2024

Prepared for

Steel Hawk Berhad

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Table of Contents

Fuelling Progress Through Sustainable Growth 4
Outlining Our Reporting Scope and Boundary 4
Reporting Framework and Guidelines 5
Statement of Assurance 5
Engage with Us 5
Accolades and Memberships 6
Awards and Recognition 6
FY2024 ESG Highlights 7
Steel Hawk's Approach to Sustainability 9
ESG Strategy 9
Our Sustainability Policy 10
Our Contributions to Global Sustainable Progress 11
The Foundations of Ethical Governance 12
Measuring Our ESG Performance 13
Connecting with Our Stakeholders 14
Materiality Assessment 17
Defining Our Strategic Focus Areas 18
Climate-Related Disclosures 20
Good Governance 22
Corporate Governance and Anti-Corruption 23
Data Privacy and Cybersecurity 25
Environmental Stewardship 26
Energy Management 27
Climate Change 28
Waste Management 30
Water Consumption 31
Social Responsibility 32
Supply Chain Management 33
Occupational Health and Safety 34
Labour Practices and Standards 36
Diversity and Inclusion 38
Talent Development 40
Community Enrichment 42

Progressing Towards a Promising Tomorrow 44
Performance Data Table 44
Performance Data Table from ESG Reporting Platform 46

Fuelling Progress Through Sustainable Growth

Steel Hawk remains steadfast in our commitment to responsible business practices, strategically integrating environmental, social and governance (“ESG”) considerations into our core business strategy. Our 2024 sustainability statement outlines the guiding principles of our operations and highlights our progress towards our sustainability aspirations as a technical and engineering service provider in the oil and gas (“O&G”) sector.

We strengthened our climate-related disclosure this financial year, transitioning from the Taskforce on Climate-related Financial Disclosures (“TCFD”) framework to incorporate elements of the International Financial Reporting Standards (”IFRS”) S2 guidelines. The Group also enhanced our emissions reporting by expanding Scope 3 disclosures to include Category 6: Business Travel, further advancing our progress towards net-zero.

Steel Hawk's growth is driven by our people, and we invest in their development through learning programmes, empowering them to enhance their skills, advance their careers and drive workplace innovation. Building on this foundation, we promote a culture of integrity by providing training on Anti-Bribery Management System (“ABMS”) awareness and implementation. We ensure ethical values are embedded in our onboarding process, aligning new hires with our integrity standards.

Outlining Our Reporting Scope and Boundary

All disclosures presented in this statement cover our business activities and operations from January 1, 2024 to December 31, 2024 (“FY2024”). Disclosures include data from our corporate office and two other operating locations across Malaysia. Historical data from the past three years were included to facilitate trend analysis and comparative assessments.

Reporting Framework and Guidelines

The Group prepared this statement in accordance with Bursa Malaysia's ACE Market Listing Requirements ("AMLR") and Bursa Malaysia's Sustainability Reporting Guide (3rd Edition). Our ESG disclosures are guided by the IFRS S2, the Global Reporting Initiative ("GRI") Standards and the UN SDGs.

Statement of Assurance

An independent limited assurance was performed by KPMG PLT on selected sustainability indicators for the financial year ended 31 December 2024. The boundary of the limited assurance engagement on the selected sustainability indicators covers Steel Hawk's operations including its subsidiaries.

Scan the QR to access our Limited Assurance Statement

Engage with Us

We highly value the insights and feedback from our stakeholders as part of our ongoing efforts to enhance sustainability reporting. Should you have any questions or suggestions regarding this statement or our reporting process, please feel free to contact us using the details provided below.

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Accolades and Memberships

Awards and Recognition

The Group's dedication to sustainability has earned us prestigious awards and recognitions, inspiring us to further enhance our efforts and pursue greater achievements.

Gold Award in The Star ESG Positive Impact Award (Category: Governance, Reporting & Transparency)

HSE Hero and LPOC Zero award, Stop Work Authority 2024 (reporting and intervention) from PETRONAS

FY2024 ESG Highlights

Good Governance and Value Creation

100% of our operations have been assessed for corruption-related risks

Zero substantiated cases of corruption

Zero substantiated security breaches involving customer privacy or losses of customer data

Environmental Stewardship

0.3% reduction in Group-wide energy intensity as compared to FY2023

Commencement of **Scope 3 GHG emissions disclosure** (Category 6 - Business Travel)

Social Responsibility

33% women representation on the Board of Directors

Zero substantiated cases of human rights violation and incidents of discrimination

RM 82,500 invested in Corporate Social Responsibility ("CSR") programmes

Building Momentum for Sustainable Growth

From the outset of our journey, we consistently focused on enhancing our ESG performance, achieving several milestones towards our targets. Moving forward, we will continue to bolster our efforts to generate lasting, positive value for all stakeholders.

FY2022

- Published the inaugural sustainability statement in alignment with the Bursa Malaysia Sustainability Reporting Guide (3rd Edition)
- Established the ESG Framework
- Established a Sustainability Governance Structure, including the Sustainability Committee ("SC")
- Established the Sustainability Policy, focused on the environment, social, and governance aspects of our business
- Identified 6 stakeholder groups: Shareholders and Investors, Government and Regulators, Customers, Suppliers and Contractors, Employees, and Local Communities
- Identified 9 common material sustainability matters, and conducted the inaugural materiality assessment
- Adopted 4 UN SDGs: SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure), SDG 13 (Climate Action) and SDG 16 (Peace, Justice and Strong Institution)

FY2023

- Established the Terms of Reference ("TOR") for the Sustainability Governance Structure
- Conducted a materiality reassessment and included common material sustainability matters (Waste Management and Emissions)
- Adopted UN SDG 5 (Gender Equality)
- Included the TCFD Transition Plan
- Conducted the inaugural corruption-related risk assessment of our operations
- Disclosed total training hours by employee category and total water consumption

FY2024

- Expanded Greenhouse Gas ("GHG") Emissions Reporting to include Scope 3 emissions, covering business travel
- Aligned our Climate-Related Disclosures with IFRS S2
- Established the Supplier ESG Checklist
- Enhanced our ESG Strategy to include strategic thrusts

Steel Hawk's Approach to Sustainability

ESG Strategy

Our Sustainability Strategy sets a systematic approach to integrating ESG factors into our business strategy. Centred on three key pillars and driven by strategic thrusts aligned with our adopted UN SDGs and material matters, this strategy facilitates informed decision-making that addresses ESG risks and capitalises on opportunities. Established in FY2024, our strategic thrusts serve as key drivers for implementing material matters, enabling us to achieve our defined objectives.

Our Vision, and Mission	**Our Vision:** To be a market leader in providing innovative solutions and new technology for the energy industry in Malaysia and internationally. **Our Mission:** • To be an environmentally conscious, fiscally responsible, well-managed for-profit enterprise that reinvests for future growth and development for the betterment of our country. • To innovate – fully understanding problems and opportunities and employing technology and resources to offer feasible solutions in accordance with our client's expectations.		
Sustainability Pillars	**Good Governance and Value Creation**	**Environmental Stewardship**	**Social Responsibility**
Strategic Thrust	Strengthening governance frameworks to uphold transparency, ethical business practices, and regulatory compliance, ensuring responsible decision-making and long-term sustainability.	Drive energy efficiency improvements and waste reduction across operations to minimise environmental impact and combat climate change.	Foster a safe, inclusive workplace and empower employees through continuous development while supporting community growth through targeted initiatives.
Material Matters	• Corporate Governance and Anti-Corruption • Data Privacy and Cybersecurity	• Energy Management • Climate Change • Waste Management • Water Consumption	• Supply Chain Management • Occupational Health and Safety • Labour Practice and Standards • Diversity and Inclusion • Talent Management • Community Enrichment
Contribution to UN SDGs			
Stakeholder Groups	Shareholders/ Investors; Regulatory Authorities; Subcontractors and Suppliers; Employees; Customers; Communities		

Our Sustainability Policy

The Group's sustainability policy outlines our sustainability principles, enabling us to integrate ESG considerations into our operations that promote responsible economic growth and minimise environmental impact.

Good Governance and Value Creation

- Implementation of the highest standards of corporate governance procedures with an emphasis on transparency to maintain the trust and confidence of our stakeholders.
- We achieve this by fostering a culture of ethical business conduct across our operations and implementing stringent measures to ensure all applicable laws and regulations are complied with.

Environmental Stewardship

- Acknowledgement of the environmental impacts contributing to climate change that could emerge from the industry we operate in and the effects associated with the phenomenon, such as global warming and erratic weather patterns.
- We are committed to managing our resources efficiently, minimising our carbon footprint, and implementing the best waste management practises.

Social Responsibility

- Treating our workforce with respect and dignity by aligning with both local and international standards.
- We also uphold human rights by having zero tolerance for the use of forced labour or child labour in our supply chain. Due to the nature of our operations, providing a fair, safe, and healthy working environment remains our utmost priority.

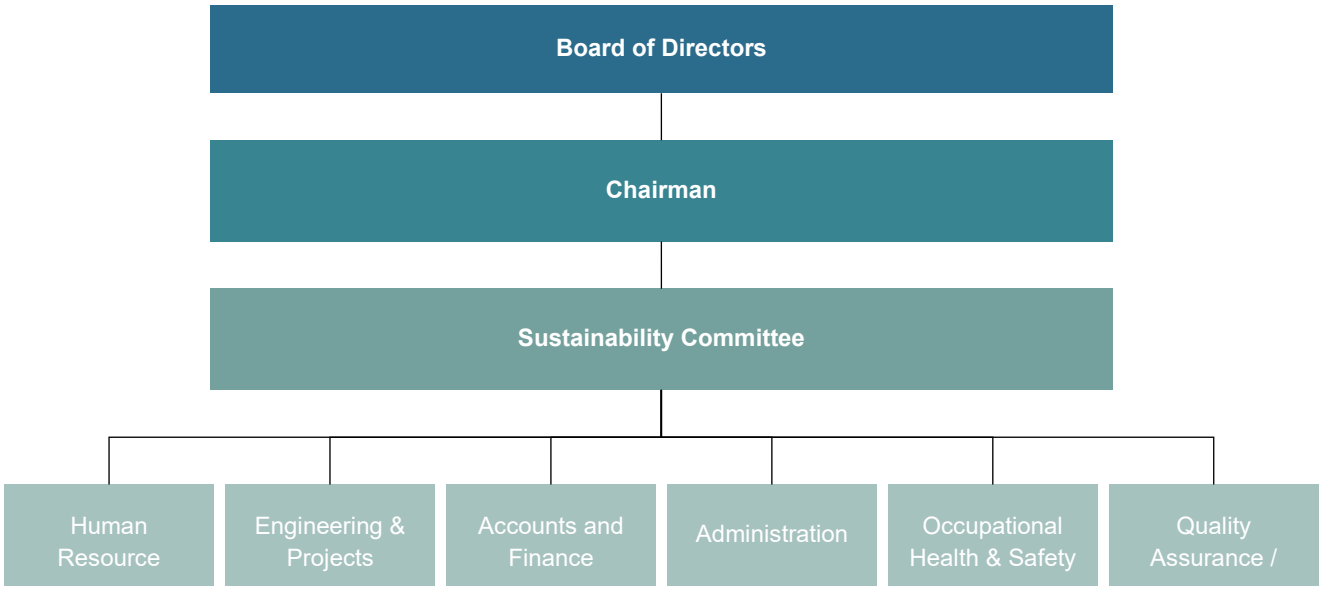
Our Contributions to Global Sustainable Progress

The 17 UN SDGs represent a collective agenda to addressing global challenges and achieving a sustainable future. Steel Hawk remains committed to adopting the four goals most relevant to our technical and engineering service operations, ensuring our continued contribution to global sustainable development.

SDG	Target	Our Actions
	Target 5.5: Ensure women's full and effective participation for leadership	• Achieved 33% women representation on the Board • Maintained non-discriminatory hiring practices, ensuring fair and equal opportunities for all, regardless of gender
	Target 8.3: Promote decent job creation and entrepreneurship	• The Group provides training on various topics for our employees, encouraging professional development • Prioritised sourcing from local suppliers to drive economic growth
	Target 8.8: Protect labour rights and promote a safe, secure working environment	• Detailed our Labour and Human Rights Policy in our Employee Handbook which is communicated during the onboarding process • Established a Health and Safety Policy to promote a safe working environment for all employees
	Target 13.2: Integrate climate change measures into policies, strategies and planning	• Consistently disclosed our Scope 1 and 2 GHG emissions since FY2022, and have commenced Scope 3 disclosures in FY2024
	Target 16.5: Substantially reduce corruption and bribery	• Established the Anti-Bribery and Corruption Policy, Whistleblowing Policy and Code of Ethics and Conduct to uphold ethical business standards

The Foundations of Ethical Governance

Our sustainability governance structure defines the roles and responsibilities of our Board of Directors ("the Board") and Sustainability Committee ("SC"), ensuring accountability and effective implementation of sustainable policies, procedures and initiatives.



Board of Directors

- Strategic oversight of the Group's overall sustainability agenda, strategies and climate-related risks and opportunities
- Provides approval for sustainability strategies, policies, material sustainability matters, and the annual Sustainability Statement proposed by the Sustainability Committee

SC

- Implements and monitors sustainability initiatives within day-to-day operations
- Identifies and proposes material sustainability matters relevant to the Group to the Chairman
- Monitors and reports on ESG-related data to the Chairman on a regular basis
- Engages with stakeholders regularly to understand and respond to their concerns and expectations

Measuring Our ESG Performance

Steel Hawk's Sustainability Key Performance Indicators ("KPIs") offer measurable metrics to track our progress towards our ESG goals. Monitoring these metrics facilitates the assessment of our initiatives' effectiveness, allowing us to identify improvement areas and drive performance enhancements. The following is a summary of our KPI progression in comparison to our 2023 targets.

Material Matters	KPIs	Performance	
		FY2023	FY2024
Good Governance			
Corporate Governance and Anti-Corruption	Achieve **zero** reported incidents of bribery and corruption annually	●	●
	Achieve **zero** reported grievances or whistle-blowing complaints to the Group annually	●	●
Environmental Stewardship			
Energy Management and Climate Change	Establish the baseline year for Scope 1 GHG emission by **FY2025**	◐	◐
	Establish the baseline year for Scope 2 GHG emission by **FY2025**	◐	◐
Waste Management	Establish the baseline year for waste reduction targets by **FY2025**	-	◐
Social Responsibility			
Supply Chain Management	Maintain local procurement rate of 90%	95%	96%
Occupational Health and Safety	Achieve **zero** cases of serious accidents annually	●	●
	Maintain **zero** fatalities throughout the reporting period	●	●
Labour Practices and Standards	Achieve **zero** substantiated complaints of human rights violations	●	●

● Achieved

◐ In-progress

Connecting with Our Stakeholders

Consistently engaging our stakeholders enables us to enhance our understanding of their prioritised issues, expectations of Steel Hawk, and the evolving business trends in the O&G sector. Integrating their perspectives refine our decision-making processes, allowing us to cultivate mutually beneficial relationships that drive long-term value generation.

Shareholders / Investors

Why We Engage

Shareholders and investors provide capital, influence market confidence, and drive long-term growth. Frequent communication with our investors allows us to cater to their requirements and align them with our business strategy. This ongoing dialogue fosters the cultivation of trust and credibility, forming the foundation for mutually beneficial and enduring partnerships.

Engagement Channel

Annually

- Annual General Meetings

As needed

- Investor briefings
- Extraordinary General Meetings
- Bursa Malaysia announcements
- Media Releases

Areas of Concern

- Risk management and business strategy
- Corporate governance
- Climate change awareness and strategies
- Audit Committee report
- Financial performance
- ESG initiatives

Our Responses

- Identified potential risks via the Enterprise Risk Management Framework
- Established robust governance-related policies such as Whistle-blowing Policy, Anti-Bribery and Corruption Policy, and Integrity Policy
- Implemented a comprehensive corporate governance structure
- Included climate-related risks and strategies
- Improved communication and transparency through accurate reporting

Regulatory Authorities

Why We Engage

Regulatory authorities establish and enforce the national laws and regulations that set the parameters of our business activities. They monitor compliance with these legal and regulatory stipulations. To maintain the highest ethical standards, we proactively monitor changes in regulatory laws and standards, ensuring strict regulatory compliance to avoid potential breaches.

Engagement Channel

Annually

- Annual report submission

As needed

- Site Visits and Inspections
- Conferences and seminars to keep abreast of latest developments of requirements

Areas of Concern

- Labour practices
- Anti-corruption practices
- Security issues
- Legal compliance
- Environmental Management

Our Responses

- Established policies to ensure compliance with relevant legislation and regulatory requirements
- Ensured the relevant legal registers are updated
- Established proper certification/licence SOPs to maintain and obtain certifications such as ISO from accredited bodies

Customers

Why We Engage

Customers are integral to Steel Hawk Berhad's economic success, as their engagement with our services drives growth. Their satisfaction enhances loyalty, strengthens long-term relationships, and bolsters our brand reputation—key factors in sustaining revenue and fostering enduring business partnerships. Their feedback provides valuable insights, enabling us to better understand and meet their evolving needs.

Areas of Concern

- The Group's reputation
- Customer relationship management
- Timely completion of project and service
- Service quality and reliability

Engagement Channel

Annually

- Annual e-mail and report submission

As needed

- Site Visits and Inspections
- Conference and seminars to keep abreast of latest developments of requirements

Our Responses

- Conducted quality assurance evaluation
- Conducted customer experience survey
- Engaged with customers to get feedback and measure satisfaction
- Improved services, addressed feedback promptly, and offered innovative solutions aligned with customer needs

Suppliers and Subcontractors

Why We Engage

Our suppliers and subcontractors provide the goods and services essential for Steel Hawk to deliver high-quality services. We actively nurture strong and enduring business partnerships through ongoing engagement and collaboration, cultivating relationships that promote mutual business success and foster sustainability across our entire value chain.

Areas of Concern

- Fair contract terms
- Negotiable payment terms
- Company reputation
- Product quality and inventory
- Adherence to ethical standards

Engagement Channel

Annually

- Supplier evaluation
- Due Diligence checklist
- Third-party declarations

As needed

- Physical, virtual and phone calls

Our Responses

- Fostered collaborative relationships
- Upheld ethical procurement practices and ensure compliance with company standards
- Ensured fair and transparent transactions
- Digitalised site checklists and inspections

Employees

Why We Engage

Our workforce is essential to Steel Hawk's success, leveraging their knowledge and expertise to drive operational efficiency. Their well-being and satisfaction lead to improved work quality and creativity, allowing us to deliver service excellence.

Areas of Concern

- Employee well-being
- Labour and human rights concern
- Health and safety
- Training and development
- Career development

Engagement Channel

Annually

- Townhall
- Performance appraisal

As needed

- Training programmes
- Corporate and community activities

Our Responses

- Prioritised safety and well-being
- Implemented flexible working arrangements
- Provided training programmes to support career growth

Communities

Why We Engage

Active participation and collaboration within the community facilitate social cohesion and stronger social connections. These are fundamental to securing Steel Hawk's social licence to operate by aligning our operations with local values and strengthening our relationship with the community.

Areas of Concern

- Providing support to the underserved
- Community engagement
- Employee volunteering

Engagement Channel

As needed

- Corporate social responsibility activities and projects
- Corporate websites

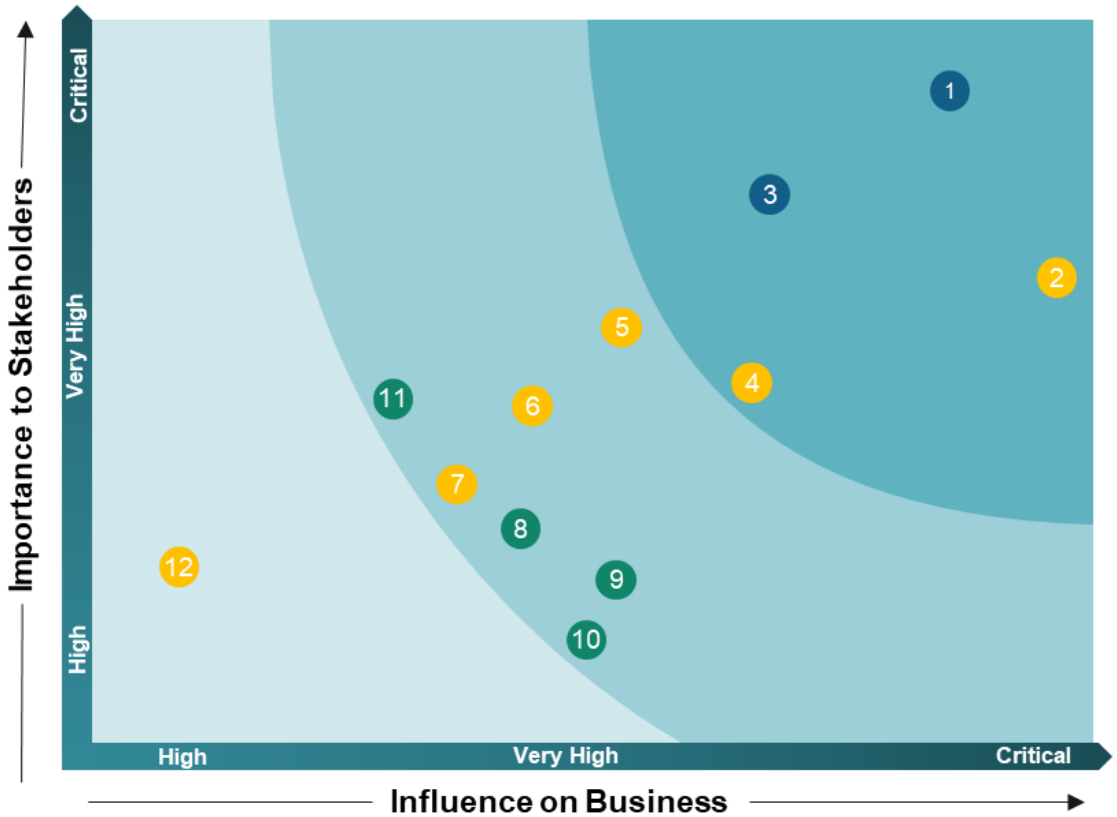
Our Responses

- Implemented corporate social responsibility programmes
- Implemented incentives to encourage a culture of volunteerism among our employees

Materiality Assessment

Materiality assessments are valuable tools for identifying the issues most significant to our stakeholders and operations. These insights guide the development of ESG-focused strategies and enable effective resource allocation, allowing us to address critical priorities in line with our sustainability objectives.

Following the materiality reassessment conducted in FY2023, we identified 12 material sustainability matters and developed a corresponding materiality matrix. These material matters and the matrix will be retained for FY2024 as they continue to hold relevance in our current operations and business context. The top four material matters are Corporate Governance and Anti-Corruption, Occupational Health and Safety, Data Privacy and Cybersecurity, and Labour Practices and Standards.



Good Governance and Value Creation	
1	Corporate Governance and Anti-Corruption
3	Data Privacy and Cybersecurity
Environmental Stewardship	
8	Energy Management
9	Climate Change
10	Waste Management
11	Water Consumption
Social Responsibility	
2	Occupational Health and Safety
4	Labour Practices and Standards
5	Supply Chain Management
6	Talent Management
7	Diversity and Inclusion
12	Community Enrichment

Defining Our Strategic Focus Areas

We aligned our material sustainability matters with the relevant stakeholder groups, UN SDGs and GRI indicators to showcase the interconnectivity between each aspect of our sustainability efforts.

Material Matters	Our Approach	UN SDGs	Stakeholder Groups
Pillar: Good Governance and Value Creation			
Corporate Governance and Anti-Corruption	Guided by a robust governance structure, we uphold high standards of integrity in our operations, implementing policies, codes and procedures to ensure ethical conduct at Steel Hawk and with all those we engage with.		
Data and Customer Privacy	We protect customers' data and privacy with established policies and procedures across our subsidiaries.		
Pillar: Environmental Stewardship			
Energy Management	The Group minimises emissions and costs by optimising fuel efficiency, adopting cleaner energy sources, and implementing real-time monitoring.		
Climate change	We mitigate our environmental impact and address climate change by managing energy consumption to reduce greenhouse gas (“GHG”) emissions.		
Water Consumption	The Group strives to enhance water management across our operations through specific measures to manage consumption.		
Waste Management	The Group reduces our environmental footprint by managing waste disposal and reducing general waste generation.		
Pillar: Social Responsibility			
Supply Chain Management	We prioritise sourcing materials, equipment and services from local subcontractors and suppliers wherever possible, contributing to the local economy. We also procure high-quality materials from reputable suppliers.		
Occupational Health and Safety	The Group implements measures to protect employee health and safety by maintaining a safe and conducive working environment.		
Labour Practices and Standards	The Group upholds the rights of employees and the community by implementing policies and procedures that safeguard these rights across our subsidiaries.		

Diversity and Inclusion	We ensure equal opportunities and engage with our workforce regardless of gender or social background.		
Talent Management	We attract, develop, and retain skilled talent through continuous training, clear career pathways, and a strong safety culture.		
Contribution to Society	The Group allocates resources to support various community initiatives aimed at alleviating the challenges faced by vulnerable groups and communities surrounding our operations.		

Climate-Related Disclosures

Climate change presents an emerging challenge with far-reaching impacts across industries and communities, particularly the O&G sector. Understanding these risks is crucial for adapting to climate-related challenges and developing strategies for a smooth transition to a low-carbon economy.

In FY2024, Steel Hawk transitioned from the Task Force on Climate-related Disclosures ("TCFD") to the IFRS S2 Climate-related Disclosures, in alignment within the National Sustainability Reporting Framework ("NSRF"). Our climate disclosures are structured around the four core pillars of Governance, Strategy, Risk Management, and Metrics and Targets.

Governance

The Board provides strategic oversight of climate-related risks and opportunities, supported by the SC in the evaluation and management of these matters.

Oversight and Management of Climate-Related Risks and Opportunities	
Board's Oversight	**Management's Role**
• Oversees sustainability-related risks, including those linked to climate change • Receives updates on sustainability and climate-related matters from the SC based on the Group's risk assessments	• The SC advises the Board on sustainability strategies, initiatives, and targets, including climate-related initiatives • Oversees the implementation of sustainability initiatives, including those related to climate, and reports progress to the Board

Strategy
As part of our low-carbon transition, we are committed to enhancing climate awareness, streamlining our strategic direction with the Group's Sustainability Policy and monitoring environmental impacts to address climate-related risks and opportunities. In FY2024, we continue tracking our Scope 1, 2 and 3 GHG emissions, aligning climate-related disclosures with regulations and established climate-related KPIs.

Management of Material Sustainability Matters
Our climate-related material sustainability matters include energy consumption, GHG emissions, water consumption and waste management. We have outlined our management approach for these matters, with performance details featured within the "Energy Management, Climate Change and Waste Management" sections.

Metrics and Targets

We identified Energy Management, Climate Change, and Waste Management as the three most material climate-related matters impacting our business. To evaluate our performance in these areas, we track and disclose the following metrics.

Metric	Unit	Description
Energy Usage	Gigajoules (“GJ”)	Tracks total fuel and electricity consumption.
GHG Emissions	Tonnes of carbon dioxide equivalent (“tCO_2e”)	Measures total greenhouse gas (“GHG”) emissions, including Scope 1, Scope 2 and limited Scope 3 (business travel) GHG emissions.
Fuel Consumption	Litres (“L”)	Measures the total amount of fuel used.
Electricity Consumption	Kilowatt-hours (“kWh”)	Records the total electricity consumption.
Waste	Metric tonnes (“MT”)	Quantifies the total amount of waste generated.

To support our sustainability goals, we have established annual KPIs aimed at reducing emissions and waste generation. These KPIs enable performance monitoring and regular evaluations to ensure continuous improvement and effective management of climate-related risks and opportunities.

- Establish a baseline year by FY2025
- Set Scope 1 and Scope 2 GHG emissions targets by FY2025

Details of our management approach and performance data can be found within the "Energy Management, Climate Change and Waste Management" sections.

Good Governance

Sustainable business operations are anchored on a foundation of strong governance. Conducting business with integrity and complying with relevant regulatory standards ensures we uphold high ethical standards throughout all aspects of our engineering service operations for the O&G sector.

Material Sustainability Matters

- Corporate Governance and Anti-Corruption
- Data Privacy and Cybersecurity

Sustainability Highlights in FY2024

- 100% of our operations have been assessed for corruption-related risks
- Zero substantiated cases of corruption for the past three years
- Zero incidents of major non-compliance with applicable laws and regulations
- Zero substantiated security breaches involving customer privacy or losses of customer data across the Group for the past three years

Corporate Governance and Anti-Corruption

Steel Hawk's zero-tolerance policy towards bribery and corruption strengthens corporate governance by fostering ethical decision-making and enhancing transparency and accountability, reinforcing stakeholder trust.

Corporate Governance

We have been a signatory of the Malaysian Anti-Corruption Commission's ("MACC") Corporate Integrity System Malaysia ("CISM") and the Corporate Integrity Pledge ("CIP") since FY2022. These harmonise our operations with established anti-corruption principles, strengthening our ability to effectively manage corruption risks.

Our quality management system is ISO 9001:2015 certified, and the Group is currently undergoing preparations for the internal and external audit process required for ISO 37001:2016 certification. As one of PETRONAS' primary service providers, we stringently comply with the PETRONAS Tenders & Contracts Administrative Manual, ensuring transparency and discouraging illicit activity within our operations.

Corporate Governance Policies	
Anti-Bribery and Corruption Policy	Integrity Policy
Board Charter	Integrity Handbook
Labour and Human Rights Policy	Gender Diversity Policy
Code of Behaviour and Ethics	Remuneration Policy
Whistleblowing Policy	Stakeholder Communications Policy
Whistleblowing Procedure	

Anti-Bribery and Corruption

In FY2024, in collaboration with MACC, we conducted an event: The Anti-Corruption Forum featuring speakers from the MACC and Steel Hawk, followed by a Majlis Lafaz Ikrar (Pledge Ceremony) witnessed by a MACC officer. This event highlighted the importance of integrity and anti-corruption practices within the Group's operations.

Anti-Corruption Forum and Majlis Lafaz Ikrar

To further embed integrity within our workforce, we provided Anti-Bribery Management System ("ABMS") awareness and implementation training sessions for our employees. New hires receive documents outlining Steel Hawk's ethical values during onboarding and are required to acknowledge them, ensuring compliance with the Group's integrity values.

Ethical Guidelines	
Employee Handbook	ABAC Manual
Integrity Handbook	Code of Business Ethics

ZERO substantiated cases of corruption for the past three years

Percentage of Employees that Received Anti-Corruption Training by Employee Category		
Employee Category	**FY2023**	**FY2024**
Management	0%	57%
Executive	3%	80%
Non-Executive/Technical	0%	62%

A corruption risk assessment is conducted on an annual basis to identify and mitigate potential risks within our business activities. In FY2024, we achieved 100% risk assessment coverage across our operations, maintaining this standard for the second consecutive year.

	FY2023	**FY2024**
Percentage of operations assessed for corruption related risks	100%	100%

Regulatory Compliance

Steel Hawk maintains operational integrity across our supply chain, adhering to the latest regulatory requirements through a robust compliance system and internal risk management procedures.

Relevant Laws and Regulations	
Companies Act, 2016	Minimum Wages Order, 2018 and its Amendments
National Wages Consultative Council Act, 2011	Personal Data Protection Act, 2010
Employee Act, 1955	Occupational Safety and Health, 1974
Petroleum and Safety Act, 1984	Factories and Machineries Act, 1965
Industrial Relations Act, 1997	Environmental Quality Act, 1974 and its Amendments
Children and Young Persons (Employment) Act, 1996	Construction Industry Development Board Act, 1994
Local Government Act, 1976	

Our compliance efforts to uphold ethical governance across our operations is accredited by the following certifications.

Permits, Licences and other Certificates	
ISO 9001:2015 Quality Management System	ISO 45001:2018 Occupational Health and Safety Management System
PETRONAS Approved License	Construction Industry and Development Board (“CIDB”) Certificate of Registration
Certificate of Government Procurement Works – Grade G7	Ministry of Finance (“MoF”) Certificate of Registration
Department of Occupational Safety and Health (“DOSH”) Approved Registration Certificate	DOSH Registration Certification for Competent Firm (Petroleum Contractor)
Certificate of Bumiputera Status and Registration by MoF, Ministry of Investment, Trade and Industry (“MITI”) and Ministry of Entrepreneur and Cooperatives Development (“MECD”)	

ZERO incidents of major non-compliance with applicable laws and regulations in FY2024

Data Privacy and Cybersecurity

As digitalisation transforms Steel Hawk's corporate operations, this adoption of digital technologies has heightened our exposure to data privacy and cybersecurity risks. Stringent cybersecurity measures are therefore a strategic priority to protect sensitive information, ensure regulatory compliance, foster customer trust and maintain business continuity.

Our data privacy measures, guided by the Personal Data Protection Act ("PDPA") 2010, govern the collection, utilisation and maintenance of personal data. We foster cybersecurity awareness among employees, ensuring they understand their roles in safeguarding sensitive information and enhancing vigilance. Complementing this initiative, we implemented various security measures to protect our data and systems, enabling us to maintain data integrity and confidentiality.

Steel Hawk's Cybersecurity Measures	
Data Access and User Authentication	Users are assigned unique IDs and passwords to prevent unauthorised access and ensure secure user authentication.
Storage and Backup	Employees are provided with 1 terabyte ("TB") of cloud storage to facilitate secure file sharing and business document backups. Data is backed up on a monthly basis.
Licensed Software	Only officially licensed software is utilised for all business transaction and operations in compliance with legal and regulatory standards.
Preventive Maintenance	IT-related operations are serviced annually to safeguard against potential data breaches and ensure system reliability.
Incident Reporting	Employees are required to report suspected incidents of data breaches or comprised passwords to the IT supervisor.
Incident Management	The IT supervisor is responsible for investigating and resolving reported issues by assessing the impact, identifying the source and implementing corrective actions to mitigate breaches.
Response to Data Loss/Theft	In the event of device loss or theft, employees must immediately inform the IT supervisor. Depending on the nature of the incident, access credentials will be promptly updated to prevent unauthorised access.
Safeguarding Data Loss	Implemented an intrusion prevention system that includes anti-malware and data loss prevention ("DP") capabilities to curb cybersecurity attacks.
Complaint Resolution	Data privacy breach complaints are systematically logged, and the supervisor ensures they are addressed in a timely manner.

ZERO substantiated security breaches involving customer privacy or losses of customer data across the Group for the past three years

Environmental Stewardship

The National Oil and Gas Service Equipment ("OGSE") Industry Blueprint serves as Steel Hawk's guide in transitioning towards environmentally responsible practices, aligning our efforts with national development agendas such as the Shared Prosperity Vision 2030 and the 12th Malaysia Plan. Our initiatives focus on optimising operations to conserve natural resources and reduce our environmental footprint.

Material Sustainability Matters

- Energy Management
- Climate Change
- Waste Management
- Water Consumption

Sustainability Highlights in FY2024

- 0.3% reduction in Group-wide energy intensity as compared to FY2023
- Commencement of Scope 3 GHG emissions disclosure (Category 6 - Business Travel)

Energy Management

Given the substantial energy demands of our oil and gas engineering services, Steel Hawk prioritises effective energy management. Streamlining our performance reduces costs, minimises carbon emissions and mitigates our environmental impact, ensuring compliance with emissions regulations.

Energy Saving Initiatives

Light Emitting Diode ("LED") Lighting

Steel Hawk has replaced our end-of-service-life traditional lighting with LED lighting across our operations. These bulbs are longer-lasting, utilise less energy and contribute to cost savings through lower electricity bills.

Machinery Upgrade

Upgraded machinery to energy-efficient models, reducing operational energy consumption by 15%. This includes upgrading our handheld grinders to have paddle-switch, for auto on/off function.

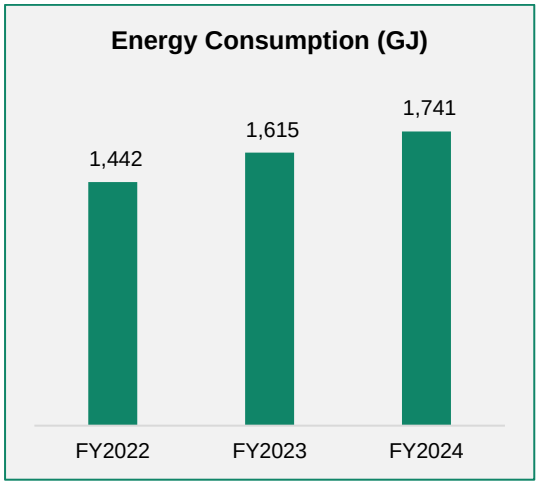
Energy Savings Awareness Programme

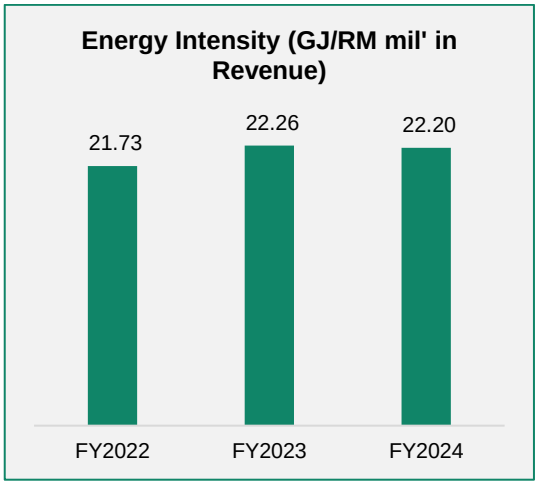
Initiated an employee awareness programme to promote energy conservation habits. Employees are encouraged to adopt habits such as switching off electrical appliances during non-operational hours or when not in use.

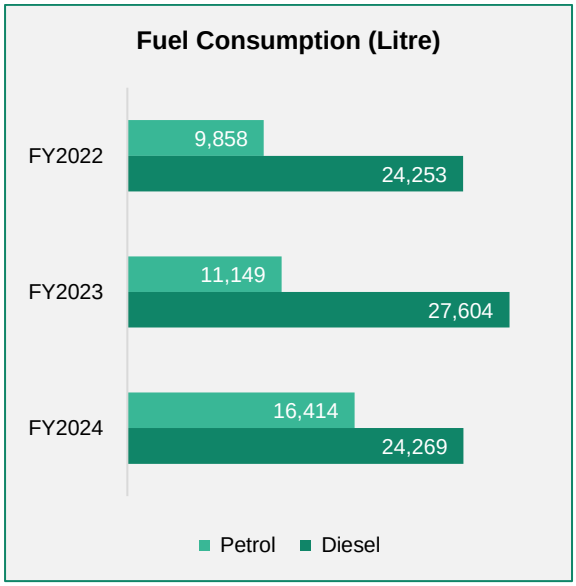
Energy Consumption

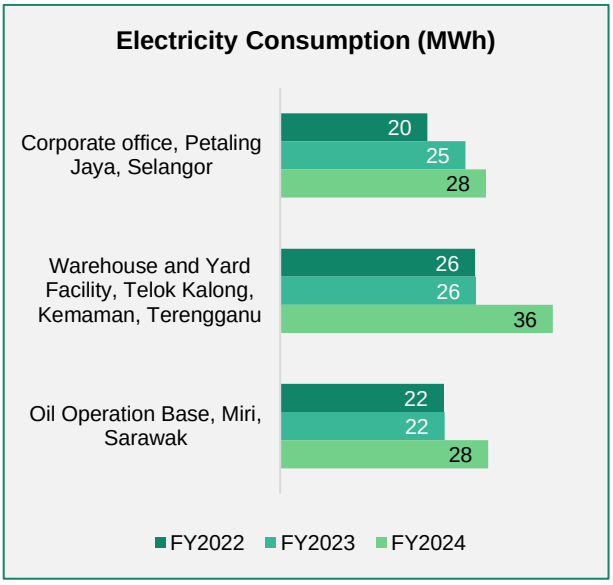
In FY2024, the Group's total energy consumption amounted to 1,741 GJ. Although there was an increase in overall energy consumption, the energy intensity declined marginally by 0.3% during the reporting year to 22.20 GJ/RM million revenue, compared to 22.26 GJ/RM million revenue in FY2023. This reduction was primarily driven by an increase in the number of active projects, which correlated with higher revenue. The Group's energy consumption is largely attributed to fuel usage for company-owned vehicles and purchased electricity. During the year, we consumed 24,269 litres of diesel for two lorries, seven pickup trucks, and forklifts, alongside 16,414 litres of petrol for our eight company-owned cars.

Our total electricity consumption totalled 92 MWh across our three locations, marking a 26% increase from FY2023 (73 MWh). This increase was due to a higher number of active projects undertaken at our Teluk Kalong Warehouse and Yard facility this reporting year. Additionally, the relocation of our Miri Operation Base from a smaller office to a larger facility contributed to the increased electricity usage.





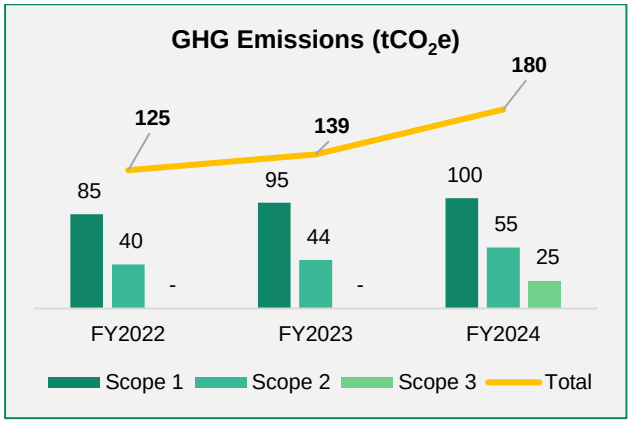


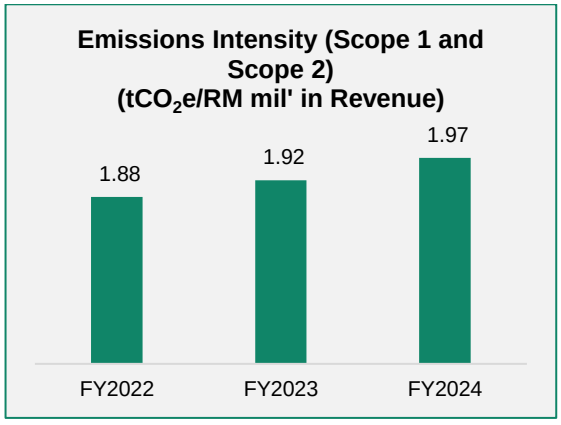


Climate Change

GHG Emissions

Steel Hawk's total GHG emissions amounted to 180 tCO_2e in FY2024. The commencement of Scope 3 emissions reporting this year from business travel resulted in a higher total compared to FY2023.



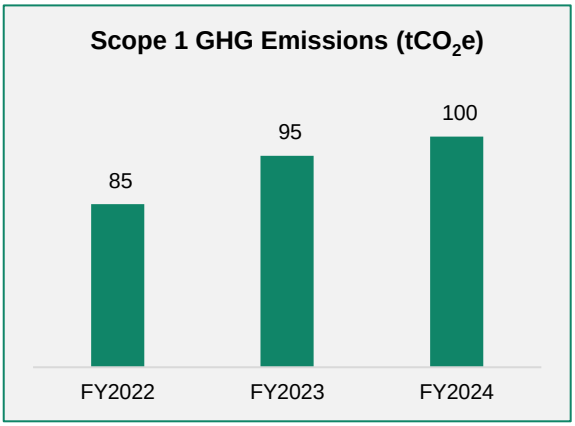


Note:

1. Scope 1 GHG emissions for mobile combustion (fuel consumption for Company-owned vehicle) are calculated following the GHG Protocol Scope 1 Guidance, with emission factors derived from the UK Government's GHG Conversion Factors for FY2022, FY2023 and FY2024.
2. Scope 2 GHG emissions for purchased electricity (location based) are calculated using the location-based approach, in accordance with the GHG Protocol Scope 2 Guidance. The emission factors are derived from the 2022 Grid Emission Factors provided by Grid Malaysia, specifically for Peninsular Malaysia and Sarawak.
3. Scope 3 GHG emissions for business travel is calculated using the distance-based method as outlined by the GHG Protocol Scope 3 Guidance, with emission factors derived from the UK Government's GHG Conversion Factors for 2024.

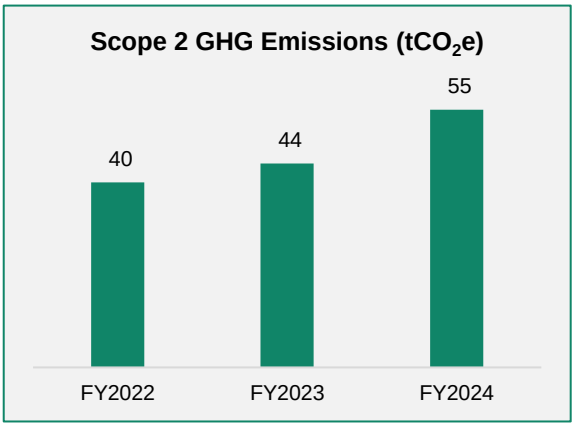
Scope 1 GHG Emissions

Scope 1 GHG emissions from mobile combustion encompass petrol and diesel fuel consumed by company-owned vehicles across our operations. In FY2024, our Scope 1 GHG emissions increased by 5% due to increased number of projects.



Scope 2 GHG Emissions

Scope 2 GHG emissions (location-based) are derived from indirect emissions from purchased electricity utilised in our operations. Steel Hawk's total Scope 2 GHG emissions for FY2024 amounted to 55 tCO_2e from all three of our operating locations.



Scope 3 GHG Emissions

In FY2024, we commenced monitoring our Scope 3 GHG emissions from business travel, encompassing both air and land transport, which totalled 25 tCO_2e.

Note: The sustainability indicators for Scope 3 GHG emissions have not been subjected to an assurance process in 2024. The Group aims to achieve comprehensive recording and reporting for the Sustainability Statement for the Financial Year Ending 31 December 2025.

Waste Management

Effective waste management initiatives reduce resource consumption and mitigate pollution risks to local ecosystems, making them a core aspect of the Group's environmental sustainability efforts. Steel Hawk is committed to responsible waste disposal practices, reinforcing our corporate responsibility while ensuring compliance with regulatory standards.

We are compliant with the Environmental Quality Act, 1974 and its Amendments, as administered by the Department of Environment ("DOE"), ensuring the responsible collection, transportation and disposal of scheduled and unscheduled wastes.

Total Waste

Waste generated by our operations is classified as either scheduled or non-scheduled waste. In FY2024, we initiated tracking of scheduled waste. Consequently, our total waste generation figures now encompass both scheduled and non-scheduled waste, resulting in a comparatively higher total waste generation figure than in previous years.

	FY2022	FY2023	FY2024
Total Waste Generated (MT)	**0.67**	**0.64**	**1.13**
Scheduled Waste (MT)	-	-	0.35
Non-Scheduled Waste (MT)	0.671	0.642	0.782
Total Waste Diverted from Landfill (MT)	**-**	**-**	**0.10**
Total Waste Directed to Landfill (MT)	**0.67**	**0.64**	**1.04**

Note: Data for Scheduled Waste generated and Total Waste Diverted from Landfills are only included from FY2024 onwards.

The sustainability indicators for waste management have not been subjected to an assurance process in 2024. The Group aims to achieve comprehensive recording and reporting for the Sustainability Statement for the Financial Year Ending 31 December 2025.

Scheduled Waste

Scheduled waste, generated only at our Telok Kalong, Kemaman, Terengganu warehouse and yard facility, is stored in a designated area labelled with required codes and hazard symbols to mitigate pollution risks and ensure safe handling.

Our scheduled waste storage inventory is regularly updated on the DOE's Electronic Scheduled Waste Information System ("eSWIS"), and we engaged a DOE-certified waste collector to handle our scheduled waste, ensuring proper collection and disposal.

Non-scheduled Waste

Non-scheduled waste at Steel Hawk consists primarily of office waste, including paper, plastics and food waste, generated across all three of our operations. We minimise this waste by integrating the 3R principles (Reduce, Reuse and Recycle) into our waste management strategy and providing designated recycling bins for domestic waste collection.

Our newly implemented Docusign software system has further reduced paper usage by digitising document approvals and streamlining administrative processes. Additionally, our E-Card system supports paper reduction while enhancing employee engagement, offering a personalised and eco-friendly way to celebrate employee milestones.

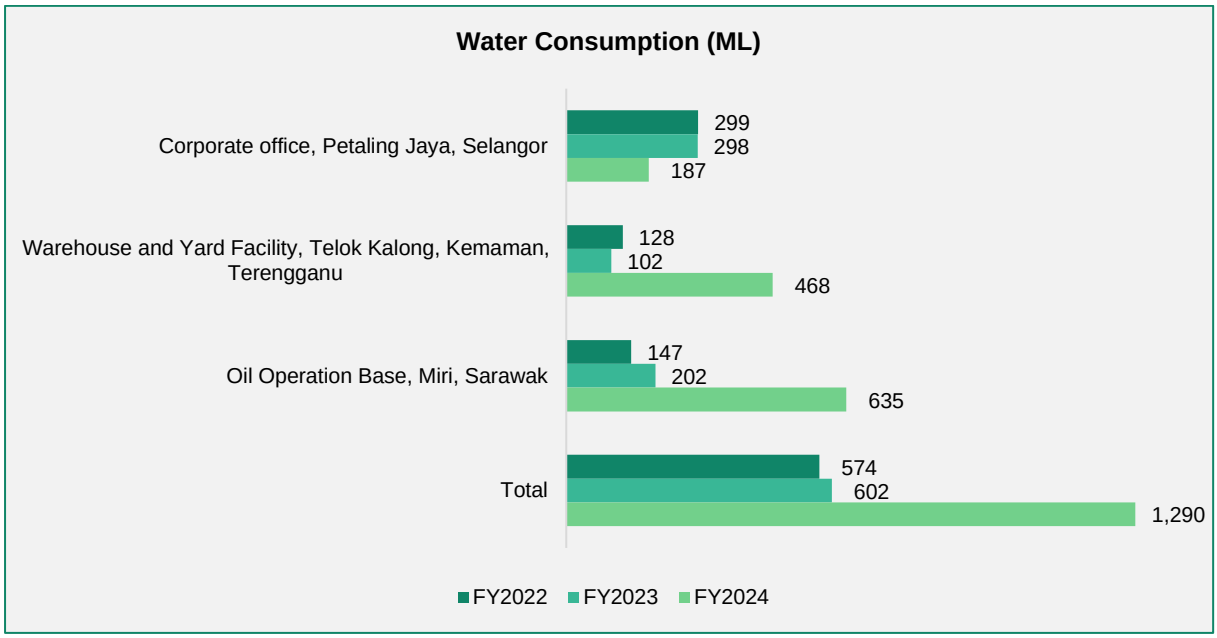
Water Consumption

Steel Hawk enhances our water efficiency by implementing internal management guidelines, allowing us to optimise water usage. Our water efficiency initiatives include installing water-efficient faucets with flow restrictors in restrooms at our corporate office to reduce water flow and minimise wastage. We also conduct routine leak detection programmes for the Group's piping systems across our premises, facilitating proactive identification and prompt repair of water leaks.

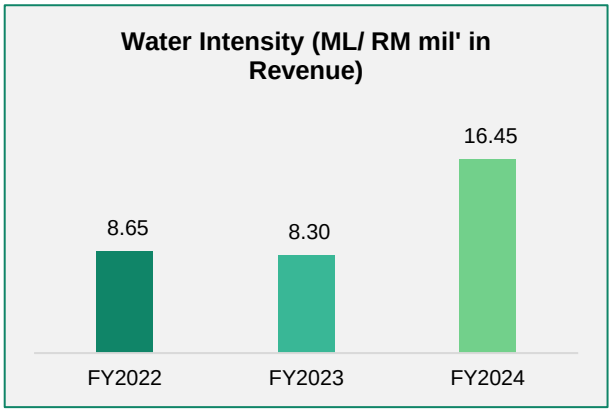
Water efficiency is regularly discussed during team meetings and awareness posters are displayed in high-traffic shared spaces, encouraging our employees to contribute to sustainable water management practices and fostering water conservation at the workplace.

Steel Hawk's Water Conservation Measures	
Regular Inspections	Conducted regular inspection and maintenance of piping systems to prevent leaks.

In FY2024, the Group consumed 1,290 ML of water. Water consumption at the Warehouse and Yard Facilities in Telok Kalong increased due to a higher volume of projects involving key processes and fabrication activities. Similarly, the Oil Operation Base in Miri recorded higher water usage following its relocation from a smaller office to a larger facility.



Note:
ML refers to Megalitres.



Social Responsibility

Social responsibility is integral to Steel Hawk's sustainable business performance, complementing our environmental considerations and ethical governance. We contribute to societal well-being through strategic initiatives that empower individuals, both within our operations and the communities we serve, fostering a more inclusive future.

Material Sustainability Matters

- Supply Chain Management
- Occupational Health and Safety
- Labour Practices and Standards
- Diversity and Inclusions
- Talent Development
- Community Enrichment

Sustainability Highlights in FY2024

- 33% women representation on the Board
- Zero substantiated cases of human rights violation and incidents of discrimination
- 800 total training hours provided to our employees
- RM82,500 contributed to community service

Supply Chain Management

Engaging with suppliers that share the Group's ESG values fosters collaborative efforts towards sustainability, driving socioeconomic and environmental benefits for the communities in which we operate. Employing local suppliers also strengthens our supply chain resilience while promoting their economic growth, ensuring mutual progress.

Steel Hawk's Procurement and Sub-Contracting Management Manual establishes the ethical standards expected of all third-party vendors, suppliers and service providers. To uphold these standards, the Group has implemented a supplier pre-qualification, registration and performance evaluation process.

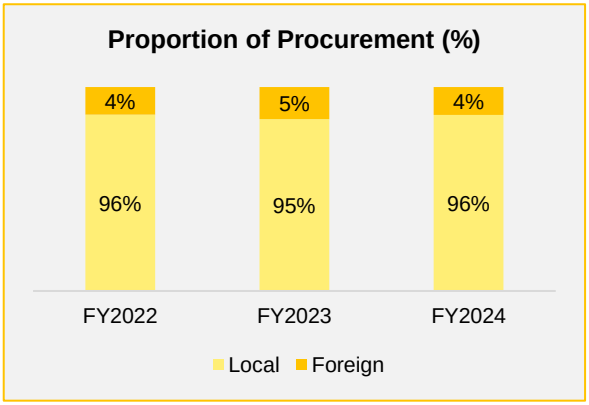
Supplier Evaluation Criteria
• Company background checks • Proof of concept • Credit assessment • Financial Continuity Strategy • Pricing • Quality of product • ESG Screening

Supplier Selection Process	Supplier Evaluation
• Corporate profile • Financial assessment • Directorship • Past track records (quality and delivery) • Payment terms • Legal history	• Technical capability and competency • Delivery performance • Quality of products/services • Responsiveness • Environmental, Health and Safety awareness • After-sales service

We procure the following goods and services to support the execution and delivery of our projects.

Goods Procured	Services Procured
• Materials: Includes essential components such as plates, pipe flanges, stud bolts, consumables, and personal protective equipment ("PPE") • Instrument Items: Covers specialised tools like gauges, gas detectors, and other critical instruments for operational safety and efficiency	• Equipment & Logistics Services: Encompasses calibration, machine rental, and transportation services • Engineering Services: Includes drawing calculations and other technical design support • Surface Treatment & Fabrication: Covers blasting and painting, hot-dip galvanizing ("HDG"), and fabrication works • Site Services: Includes site surveys and other related fieldwork

We prioritise sourcing products and services from local suppliers and subcontractors whenever possible. In FY2024, the Group allocated 96% of our procurement to local suppliers and subcontractors.

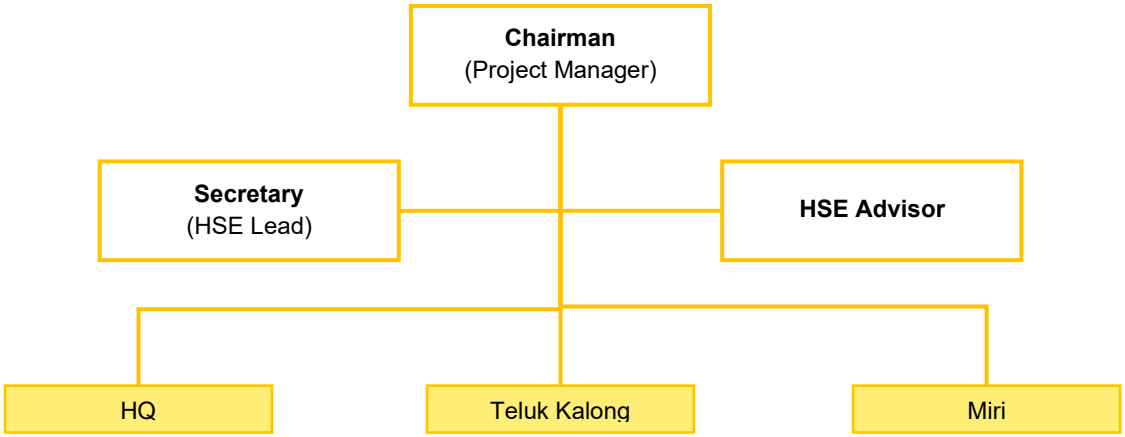


Occupational Health and Safety

Safety is ingrained in Steel Hawk's work culture, upholding a secure work environment during our O&G servicing operations. Implementing stringent safety measures enable us to proactively minimise occupational hazards and safeguard employee welfare, preventing operational disruptions and strengthening our overall resilience.

Health, Safety and Environment ("HSE") Committee

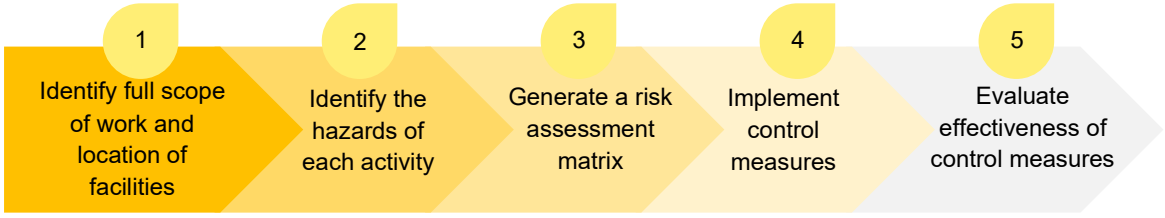
The HSE Committee reinforces our safety commitments by fostering a culture of safety, environmental responsibility and employee well-being. By integrating both employee and management perspectives, the Committee enhances our understanding of safety risks that strengthen our safety procedures and encourages employees to actively contribute towards maintaining a secure working environment.



Occupational Health and Safety ("OHS") Management System

Our ISO 45001:2018 certified OHS system ensures Steel Hawk's compliance with industry-specific OHS requirements, mitigating operational, financial and legal risks. It is underpinned by our Health, Safety and Environment ("HSE") Policy aligned with the Hazard Identification, Risk Assessment and Risk Control ("HIRARC") Procedure.

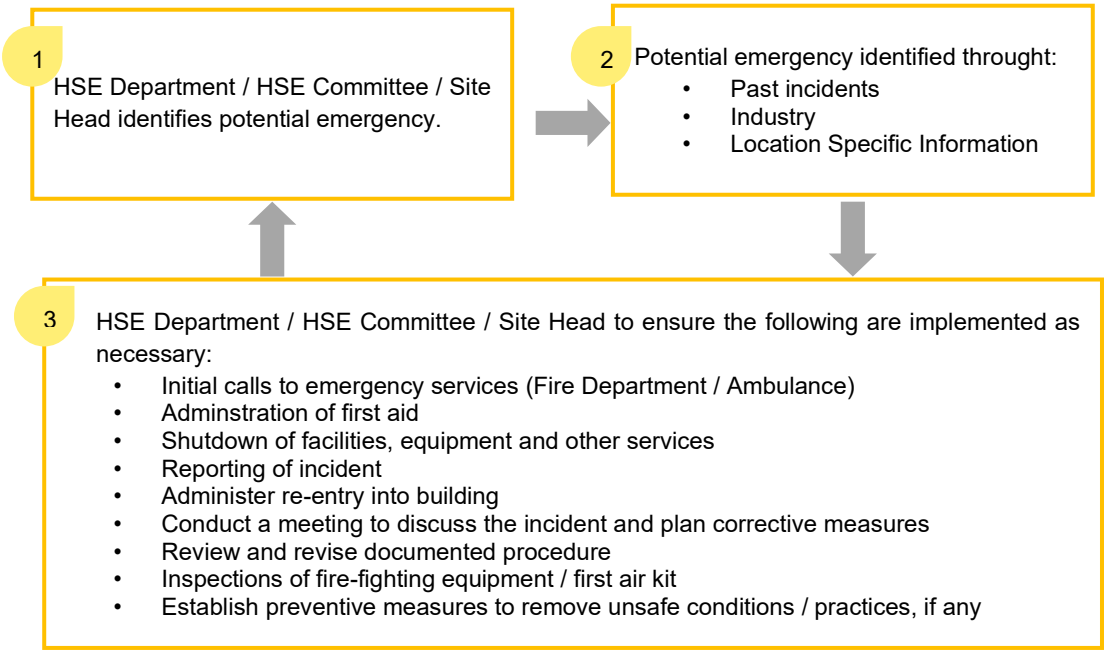
HIRARC serves as a systematic approach to managing workplace safety, allowing us to implement effective mitigation measures and maintain strict regulatory compliance during incident investigations and reporting. Leveraging the insights gained from these investigations, we can identify root causes and develop targeted solutions that equip us to uphold our record of zero lost-time injuries ("LTI") and fatalities.



Emergency Preparedness and Response Procedure

Steel Hawk's Emergency Preparedness and Response Procedure equips employees with the knowledge necessary to respond effectively to unforeseen events. Emergency Response Team ("ERT") members undergo competency training in first aid and firefighting methods in

accordance with government standards, ensuring they are well-versed in proper rescue and evacuation methods.



We further enhance preparedness by conducting annual emergency drills to reinforce awareness and ensure our workforce remains well-prepared and up to date with established emergency protocols. Such proactive measures are integral to fostering safety and readiness across the organisation.

In FY2024, we recorded zero fatalities and Lost Time Incident Rate ("LTIR") over the past three years.

Criteria	FY2022	FY2023	FY2024
Total number of hours worked	101,935	121,633	153,318
Number of lost-time injuries (LTI)	0	0	0
Number of fatalities as a result of work-related injuries or ill health	0	0	0
Lost-time Incident Rate ("LTIR")	0	0	0

Health and Safety Training

Regular HSE meetings and campaigns are conducted to emphasise the importance of compliance and to keep employees informed of the latest health, safety, and environmental regulations. Our Health and Safety Policy was displayed to all employees on notice boards, increasing awareness and ensuring accessibility.

The Group also organises frequent training and competency programmes to educate employees on HSE best practices, ensuring they remain up-to-date with evolving standards. Our collective efforts have resulted in zero recorded violations of health and safety regulations.

	FY2022	FY2023	FY2024
Number of employees who received health and safety training	13	16	9

Note: Number of employees that received HSE training was determined annually based on our Training Needs Analysis.

Labour Practices and Standards

Steel Hawk's dedicated workforce propels our organisational growth. We prioritise upholding their fundamental human rights by adhering to ethical labour standards, fostering a high-performance work environment that ensures fair treatment, prioritises employee well-being and supports career advancement.

The Group maintains transparency in our human rights performance through consistent monitoring and prompt issue resolution. Open communication channels facilitate employee feedback and timely responses, reinforcing an inclusive workplace culture.

Our Labour and Human Rights Policy guides our efforts to identify and mitigate potential human rights violations, while our due diligence process, aligned with the UN Guiding Principles on Business and Human Rights, includes regular policy reviews and rigorous impact assessments.

ZERO substantiated cases concerning human rights violation for the past three years

ZERO reported incidents of discrimination

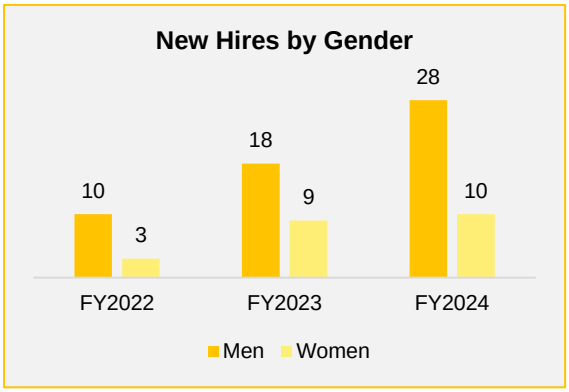
Employee Recruitment

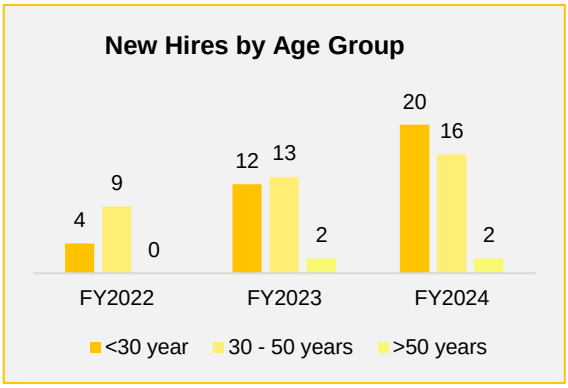
The Group's recruitment process adheres to the following procedures to ensure compliance with legal standards and fair hiring practices.

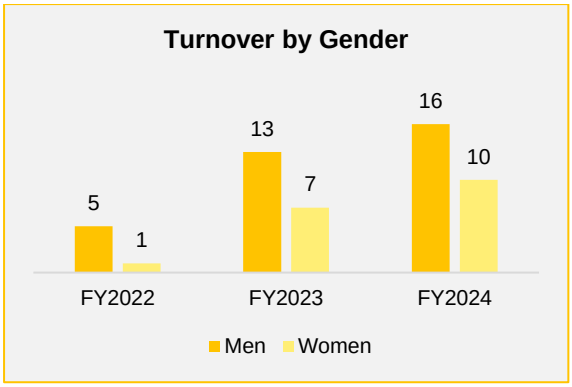
Recruitment Procedures		
	HR Manual Handbook	The handbook outlines the recruitment process to ensure its legality and adherence to the Group's policies.
	Pre-Employment Medical Checkup	Candidates are required to undergo a pre-employment medical checkup to ensure they are physically fit and able to perform the job requirements.
	Background Checks	To verify that candidates have no history of corruption or related criminal offenses, we conduct background checks on candidates through the Corruption Offender Database on the MACC website.

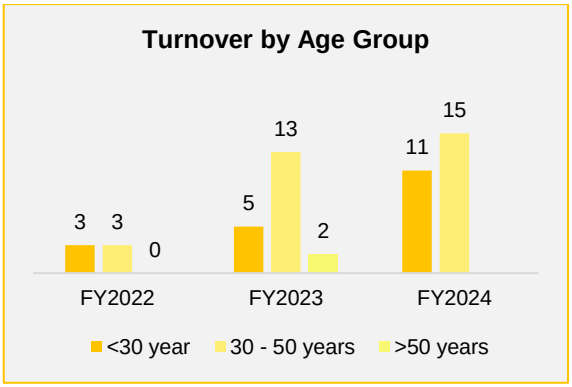
Further to that, we provide all employees with an Employee Handbook to raise awareness of their rights and promote compliance to human rights principles.

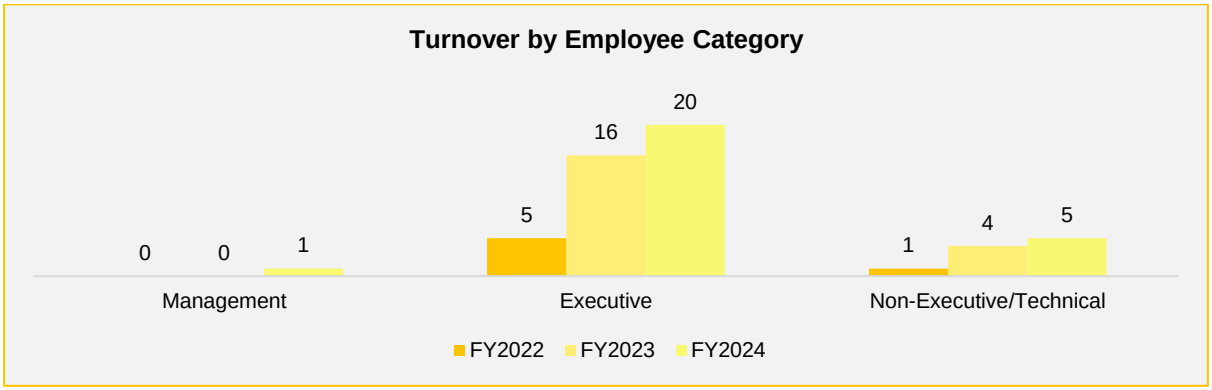
The Group welcomed a total of 38 new hires and recorded 26 turnovers in FY2024.











Parental Leave

In this reporting period, we recorded a 100% return-to-work rate for male employees who utilised parental leave.

	Gender	FY2022	FY2023	FY2024
Employees Entitled to Paternity Leave	Men	1	2	4
	Women	1	4	0
Number of employees who took Parental Leave	Men	1	2	4
	Women	1	4	0
Number of employees who returned after Parental Leave	Men	0	2	4
	Women	0	4	0
Number of employees who returned to work after parental leave ended that were still employed 12 months after their return	Men	0	2	4
	Women	0	4	0

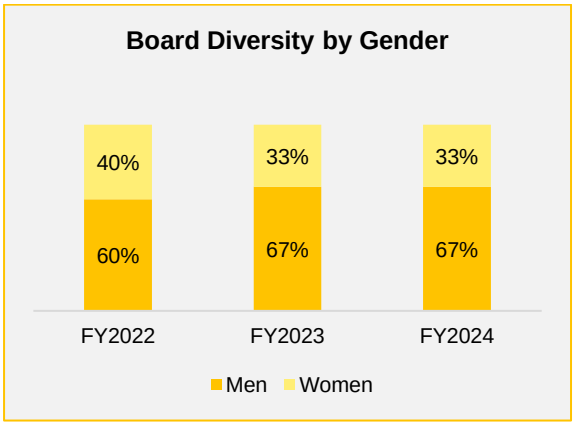
Diversity and Inclusion

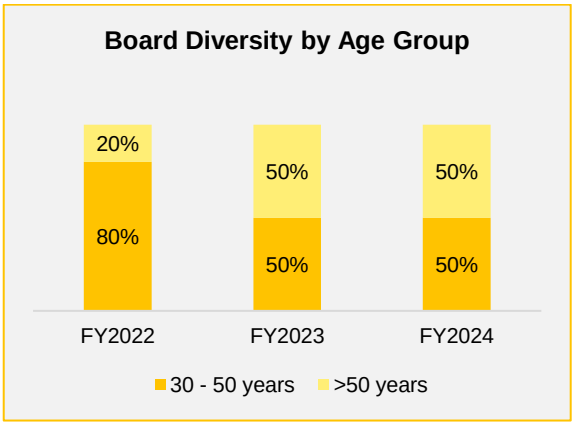
We embrace diversity to establish an equitable workplace enriched by varied perspectives, creating a respectful work environment that empowers our people while strengthening our competitive edge in the O&G engineering services sector.

The Group cultivates a workplace that promotes equal opportunity and non-discrimination through various initiatives such as fair hiring practices. All candidates receive equal consideration based on their qualifications and experience regardless of background, gender and race. Self-appraisals are reviewed objectively by managers without discrimination to gender, ensuring evaluations are free from bias.

Board Diversity

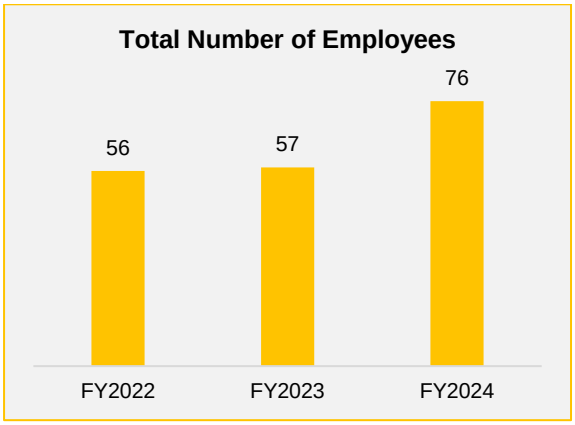
Steel Hawk's Board of Directors comprises six members, with women accounting for 33% of the Board – exceeding the national target of 30% female representation set by the Malaysian Code on Corporate Governance ("MCCG").

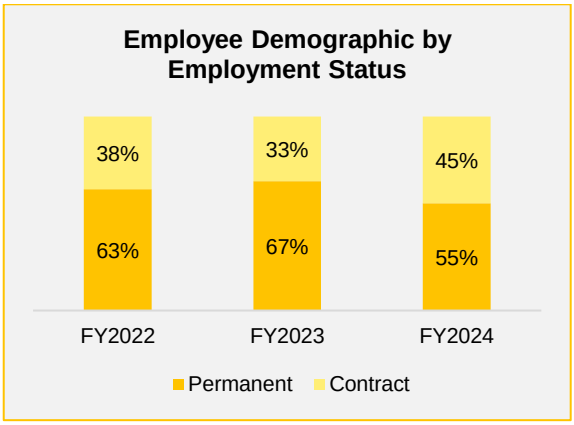


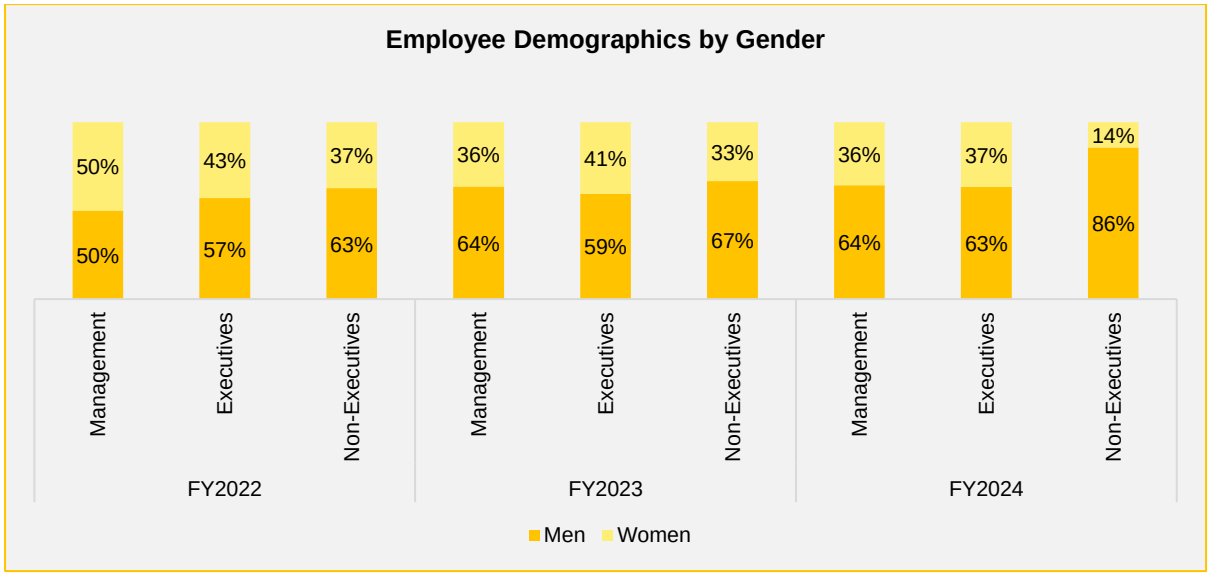


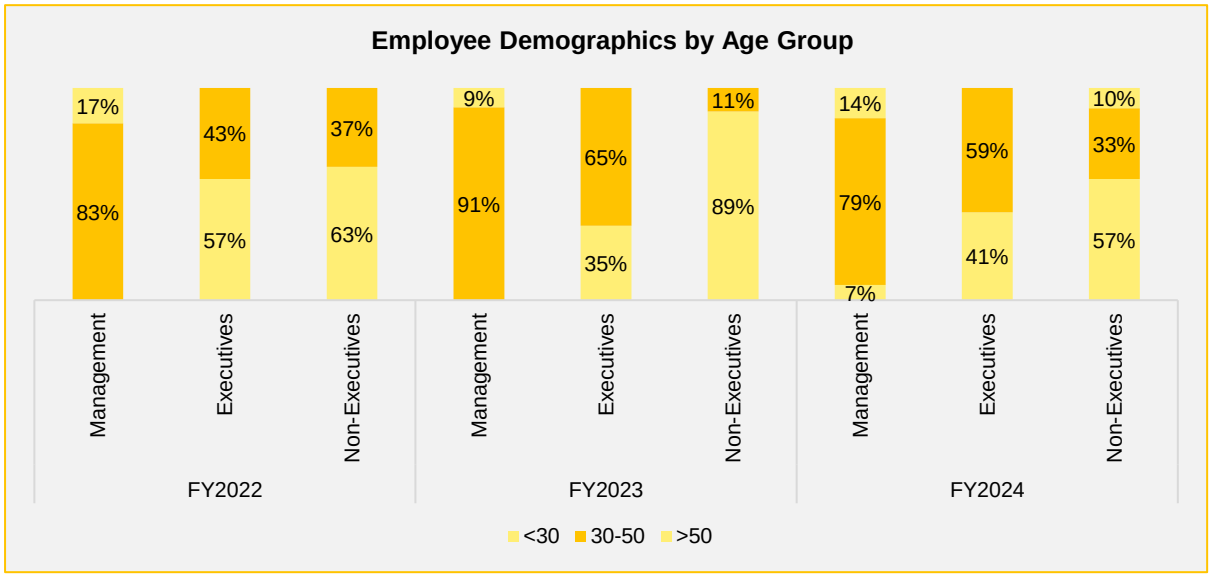
Employee Diversity

In FY2024, our workforce primarily consisted of executive roles (54%), followed by non-executive roles (28%) and management positions (18%).






Employee Demographics by Gender
50%
50%
43%
57%
37%
63%
36%
64%
41%
59%
33%
67%
36%
64%
37%
63%
14%
86%
Management
Executives
Non-Executives
Management
Executives
Non-Executives
Management
Executives
Non-Executives
FY2022
FY2023
FY2024
Men
Women


Employee Demographics by Age Group
17%
83%
43%
57%
37%
63%
9%
91%
65%
35%
11%
89%
14%
79%
7%
59%
41%
10%
33%
57%
Management
Executives
Non-Executives
Management
Executives
Non-Executives
Management
Executives
Non-Executives
FY2022
FY2023
FY2024
<30
30-50
>50

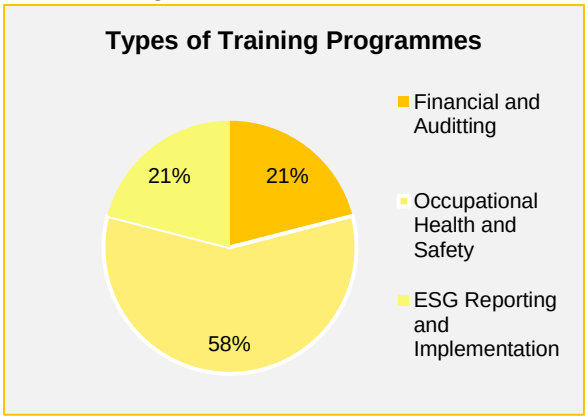
Talent Development

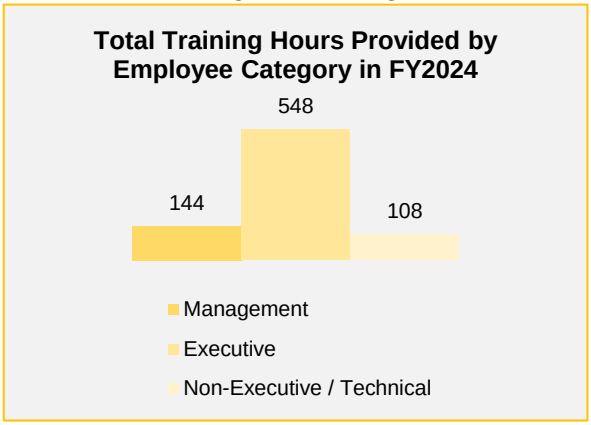
Recognising that workforce performance and business growth are directly linked, the Group invests in employee development to strengthen our workforce, facilitate effective succession planning and mitigate leadership gaps, securing the Group's sustained growth.

Employee Development

We implemented a Training Needs Analysis ("TNA") to asses each employee's specific career development needs. The process allows us to design an Annual Training Plan suited to addressing specific competency gaps within our workforce, facilitating their skill development and enhancing their performance. In FY2024, we provided training in areas such as financial and auditing, occupational health and safety, and ESG Reporting and Implementation.

Our training sessions amounted to a total of 800 hours of training, benefitting 56 attendees.





Note: Number of employees that received training was determined annually based on our Training Needs Analysis.

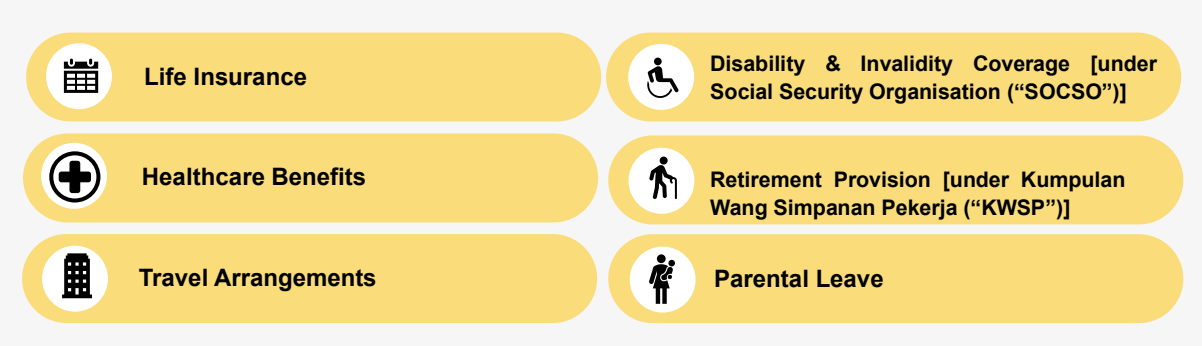
Performance Review

Complementing this effort is the annual performance appraisal performed by the Human Resources Department at the end of every financial year. Supervisors set formal Key Performance Indicators ("KPIs") which are documented in the Performance Appraisal Form, while continuous assessments are conducted throughout the year to monitor progress.

	FY2022	FY2023	FY2024
Number of employees that received appraisals	46	47	53

Employee Benefits

Our employee benefits plan goes beyond financial compensation, taking a comprehensive approach to address the diverse needs of our workforce. Our benefits programme supports both their well-being and financial stability, including a range of services such as retirement savings plans, healthcare coverage and assistance, subsidies and allowances.

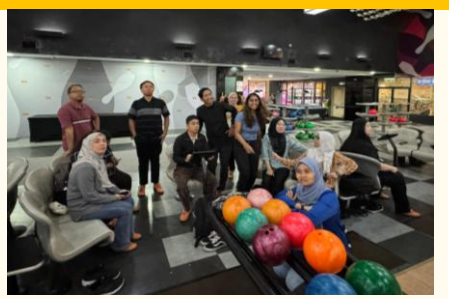


Strengthening Emotional Wellness Through Plus Vibes

Steel Hawk proactively supports the well-being of employees through access to "Plus Vibes," an IT-based application that encourages a positive emotional state. Plus Vibes provides expert-led stress management and emotional well-being sessions, fostering a supportive work environment where employees can readily seek assistance.

Employee Engagement

Steel Hawk actively engages with our employees to foster a strong sense of unity at the workplace. We demonstrate appreciation and reinforce employee value through providing recognition and rewards.

Town Hall 2024
On 30 July 2024, the Town Hall 2024 (Virtual) session was held to provide updates on the latest revisions to the employee handbook, including policies on overtime and Health, Safety, and Environment.
Bowling with HQ Team
On 19 July 2024, the HQ team engaged in a post-work bonding activity through a bowling session at One Utama Bowling Centre. 

Football TKY team

A friendly football match between Steel Hawk's Teluk Kalong Yard team and the team from UBF Maintenance Sdn Bhd was held on 7 August 2024 as part of the Group's engagement activities.

Secret Santa Exchange Gift

In December, a Secret Santa gift exchange was organised to foster holiday cheer and strengthen team bonds. Participants were randomly assigned a colleague to purchase a gift for within a set price limit. The anonymity of the exchange added an element of surprise, promoting camaraderie, generosity, and a festive atmosphere within the team.

Community Enrichment

Investing into corporate social responsibility ("CSR") initiatives enables Steel Hawk promote social equity within our communities by empowering vulnerable groups and encouraging socioeconomic growth. These efforts foster positive long-term relationships, enhancing our reputation and reinforcing our social license to operate.

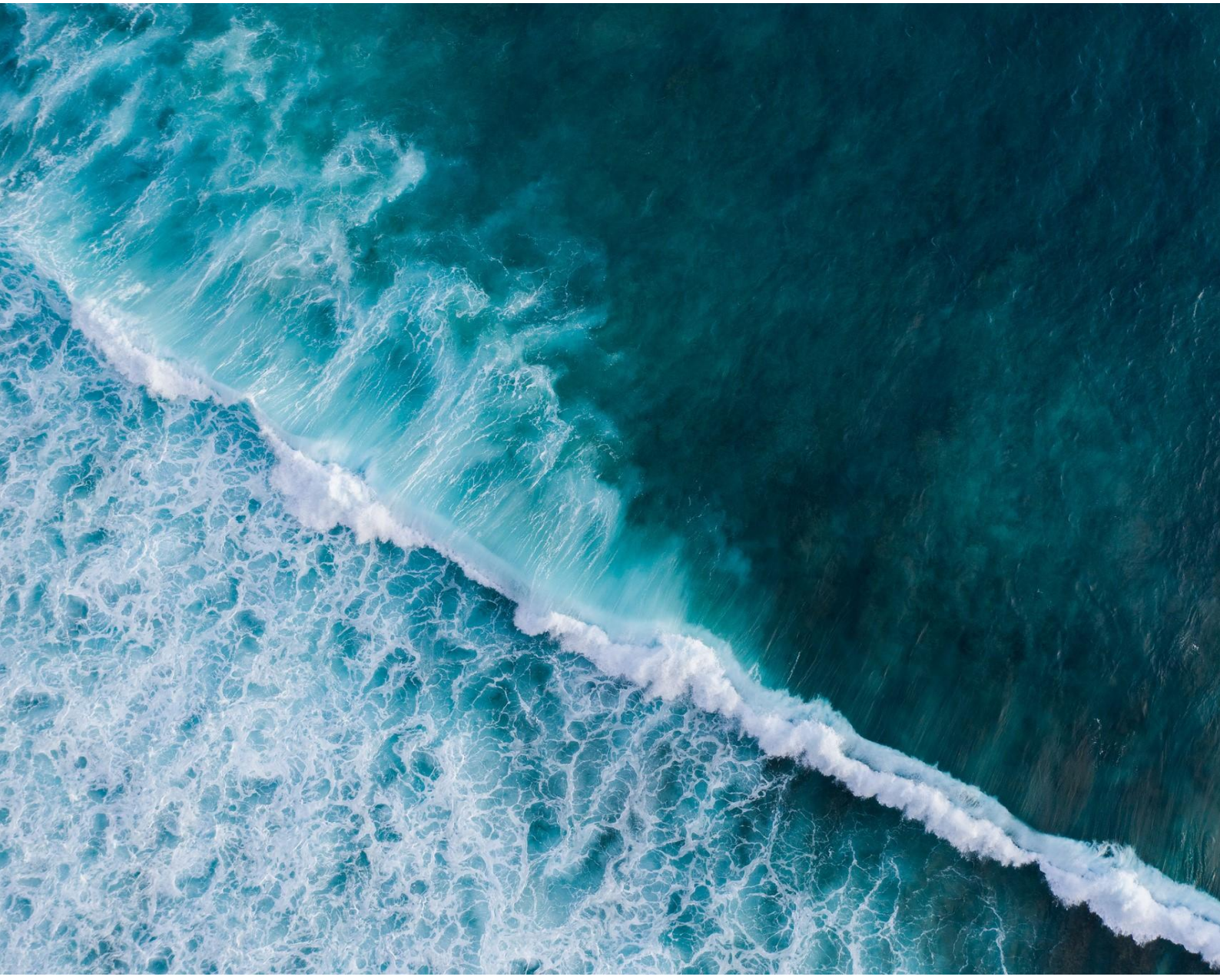
The Group focuses on CSR initiatives that support environmental conservation, community welfare and education. We prioritise ethical alignment in our selection of humanitarian organisations, conducting rigorous due diligence to ensure they meet established criteria.

CSR Organisation Criteria

1. It must not fall under any category that the Group does not support or contribute to.
2. It must not pose risks of perceived improper advantage for the Group.
3. The proposed recipient must be a legitimate organisation.
4. The proposed recipient must not have affiliations with Public Officials.

During the year, we provided monetary and non-monetary contributions totalling RM 82,500 to 6 organisation, reflecting our commitment to driving positive social impact.

No	Community Programmes	Organisations	Amount (RM)
1	Majlis Iftar & Bantuan Ramadhan untuk Asnaf 2024	1	9,000
2	Michaelians Got Talent 2024	1	7,500
3	Oil & Gas Asia (OGA) 2024	1	35,000
4	Bursa Bull Charge 2024 (Photobooth)	1	10,000
5	ESG & Brands Forum 2024	1	15,000
6	Energy Career Aspiration Networking Series (ECANS)	1	6,000
Total		6 organisations	82,500



Progressing Towards a Promising Tomorrow

2024 marked a year of strategic advancement for Steel Hawk, as we reinforced our climate resilience by adopting industry-leading climate-related best practices and integrated innovative ESG initiatives throughout our technical and engineering service lines. Our successful transition to the ACE Market provides further momentum for our sustainability journey, with these achievements creating a strong foundation for our continued success in the O&G sector and our contribution to a more equitable future.

Performance Data Table

Governance

Indicator	Unit	FY2022	FY2023	FY2024
Corporate Governance and Anti-Corruption				
Bursa C1(a) Percentage of employees who have received training on anti-corruption by employee category				
• Management	%	-	0	57
• Executive	%	-	3	80
• Non-Executive/Technical	%	-	0	62
Bursa C1(b) Percentage of operations assessed for corruption related risks	%	-	100	100
Bursa C1(c) Confirmed incidents of corruption and actions taken	Number	0	0	0
Bursa C3(b) Percentage of directors by gender and age				
Male	%	60	67	67
Female	%	40	33	33
<30	%	0	0	0
30-50	%	80	50	50
>50	%	20	50	50
Data Privacy and Security				
Bursa C8(a) Number of substantiated complaints concerning breaches of customer privacy or losses of customer data	Number	0	0	0
Supply Chain Management				
Bursa C7(a) Proportion of spending on local suppliers	%	96	95	96

Note: Data for percentage of employees who received training on anti-corruption, and percentage of operations assessed for corruption related risk was disclosed from FY2023 onwards.

Environment

Indicator	Unit	FY2022	FY2023	FY2024
Energy Management and Climate Action				

Bursa C4(a) Total energy consumption	GJ	1,442	1,615	1,741
Bursa C4(a) Total energy consumption	MWh	400	449	484
Bursa C11(a) Scope 1 emissions in tonnes of CO_2e	tCO_2e	85	95	100
Bursa C11(b) Scope 2 emissions in tonnes of CO_2e	tCO_2e	40	44	55
Bursa C11(c) Scope 3 emissions in tonnes of CO_2e (Category 6: Business Travel)	tCO_2e	-	-	25
Waste Management				
Bursa C10(a) Total waste generated	tonnes	0.67	0.64	1.13
Bursa C10(a)(i) Total waste diverted from disposal	tonnes	-	-	0.10
Bursa C10(a)(ii) Total waste directed to disposal	tonnes	0.67	0.64	1.04
Water Management				
Bursa C9(a) Total volume of water used	ML	574	602	1,290

Note:

1. Scope 3 GHG emissions was included in FY2024 onwards, limited to business travel.
2. The sustainability indicators for Scope 3 GHG emissions and indicators under Waste Management have not been subjected to an assurance process in 2024. The Group aims to achieve comprehensive recording and reporting for the Sustainability Statement for the Financial Year Ending 31 December 2025.
3. Waste data was not subjected to external assurance.
4. Data for Scheduled Waste generated and Total Waste Diverted from Landfills are only included from FY2024 onwards.

Social

Indicator	Unit	FY2022	FY2023	FY2024
Health and Safety				
Bursa C5(a) Number of work-related fatalities	Number	0	0	0
Bursa C5(b) Lost time incident rate ("LTIR")	Rate	0	0	0
Bursa C5(c) Number of employees trained on health and safety standards	Number	13	16	9
Labour Practices and Standards				
Bursa C6(d) Number of substantiated complaints concerning human rights violation	Number	0	0	0
Bursa C6(a) Total hours of training by employee category				
• Management	Hours	-	-	144
• Executive	Hours	-	-	548
• Non-Executive/Technical	Hours	-	-	108
Bursa C6(c) Total number of employee turnover by employee category				
• Management	Number	0	0	1
• Executive	Number	5	16	20
• Non-Executive	Number	1	4	5

Diversity, Equity and Inclusion				
Bursa C3(a) Percentage of employees by gender and age group, for each employee category				
Gender group by employee category				
• Management (Male)	%	50	64	64
• Management (Female)	%	50	36	36
• Executive (Male)	%	57	59	63
• Executive (Female)	%	43	41	37
• Non-Executive/Technical (Male)	%	63	67	86
• Non-Executive/Technical (Female)	%	37	33	14
Age group by employee category				
• Management (<30)	%	0	0	7
• Management (30-50)	%	83	91	85
• Management (>50)	%	17	9	15
• Executive (<30)	%	57	35	41
• Executive (30-50)	%	43	65	59
• Executive (>50)	%	0	0	0
• Non-Executive/Technical (<30)	%	63	89	57
• Non-Executive/Technical (30-50)	%	37	11	33
• Non-Executive/Technical (>50)	%	0	0	10
Bursa C6(b) Percentage of employees that are contractors or temporary staff	%	38	33	45
Community Engagement				
Bursa C2(a) Total amount invested in the community where the target beneficiaries are external to the listed issuer	RM	-	81,950	82,500
Bursa C2(b) Total number of beneficiaries of the investment in communities	Number	-	3 organisations	6 organisations

Note:

1. Total hours of training by employee category are disclosed from FY2024 onwards.
2. Number of employees that received training was determined annually based on our Training Needs Analysis.

Performance Data Table from ESG Reporting Platform

Indicator	Measurement Unit	2024
Bursa (Anti-corruption)		
Bursa C1(a) Percentage of employees who have received training on anti-corruption by employee category		
Management	Percentage	57.00
Executive	Percentage	80.00
Non-executive/Technical Staff	Percentage	62.00
Bursa C1(b) Percentage of operations assessed for corruption-related risks	Percentage	100.00
Bursa C1(c) Confirmed incidents of corruption and action taken	Number	0
Bursa C3(b) Percentage of directors by gender and age group		
Male	Percentage	67.00
Female	Percentage	33.00
Under 30	Percentage	0.00
Between 30-50	Percentage	50.00
Above 50	Percentage	50.00
Bursa (Data privacy and security)		
Bursa C8(a) Number of substantiated complaints concerning breaches of customer privacy and losses of customer data	Number	0
Bursa (Supply chain management)		
Bursa C7(a) Proportion of spending on local suppliers	Percentage	96.00
Bursa (Energy management)		
Bursa C4(a) Total energy consumption	Megawatt	484.00
Bursa (Emissions management)		
Bursa C11(a) Scope 1 emissions in tonnes of CO2e	Metric tonnes	100.00
Bursa C11(b) Scope 2 emissions in tonnes of CO2e	Metric tonnes	55.00
Bursa C11(c) Scope 3 emissions in tonnes of CO2e (at least for the categories of business travel and employee commuting)	Metric tonnes	25.00
Bursa (Waste management)		
Bursa C10(a) Total waste generated	Metric tonnes	1.13
Bursa C10(a)(i) Total waste diverted from disposal	Metric tonnes	0.10
Bursa C10(a)(ii) Total waste directed to disposal	Metric tonnes	1.04
Bursa (Water)		
Bursa C9(a) Total volume of water used	Megalitres	1,290.000000
Bursa (Health and safety)		
Bursa C5(a) Number of work-related fatalities	Number	0
Bursa C5(b) Lost time incident rate ("LTIR")	Rate	0.00
Bursa C5(c) Number of employees trained on health and safety standards	Number	9
Bursa (Labour practices and standards)		
Bursa C6(a) Total hours of training by employee category		
Management	Hours	144
Executive	Hours	548
Non-executive/Technical Staff	Hours	108
Bursa C6(c) Total number of employee turnover by employee category		
Management	Number	1
Executive	Number	20
Non-executive/Technical Staff	Number	5
Bursa C6(d) Number of substantiated complaints concerning human rights violations	Number	0
Bursa (Diversity)		
Bursa C3(a) Percentage of employees by gender and age group, for each employee category		
Age Group by Employee Category		
Management Under 30	Percentage	7.00
Management Between 30-50	Percentage	85.00
Management Above 50	Percentage	15.00
Executive Under 30	Percentage	41.00

Internal assurance | External assurance | No assurance | (*)Restated

Performance Data Table from ESG Reporting Platform (Con't)

Indicator	Measurement Unit	2024
Executive Between 30-50	Percentage	59.00
Executive Above 50	Percentage	0.00
Non-executive/Technical Staff Under 30	Percentage	57.00
Non-executive/Technical Staff Between 30-50	Percentage	33.00
Non-executive/Technical Staff Above 50	Percentage	10.00
Gender Group by Employee Category		
Management Male	Percentage	64.00
Management Female	Percentage	36.00
Executive Male	Percentage	63.00
Executive Female	Percentage	37.00
Non-executive/Technical Staff Male	Percentage	86.00
Non-executive/Technical Staff Female	Percentage	14.00
Bursa C6(b) Percentage of employees that are contractors or temporary staff	Percentage	45.00
Bursa (Community/Society)		
Bursa C2(a) Total amount invested in the community where the target beneficiaries are external to the listed issuer	MYR	82,500.00
Bursa C2(b) Total number of beneficiaries of the investment in communities	Number	6

Internal assurance | External assurance | No assurance | (*)Restated

Note:

1. Data for percentage of employees who received training on anti-corruption, and percentage of operations assessed for corruption related risk was disclosed from FY2023 onwards.
2. Scope 3 GHG emissions was included in FY2024 onwards, limited to business travel.
3. The sustainability indicators for Scope 3 GHG emissions and indicators under Waste Management have not been subjected to an assurance process in 2024. The Group aims to achieve comprehensive recording and reporting for the Sustainability Statement for the Financial Year Ending 31 December 2025.
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7. Number of employees that received training was determined annually based on our Training Needs Analysis.