SAMLING

ADDING VALUES, CARING FOR TOMORROW

ESG Roadmap & Transformative Action Plan

A group-wide commitment to responsible forestry, sustainable sourcing, climate action and transparent governance — structured around eight strategic pillars and a clear pathway to delivery.

STATUS · MAY 2026

Samling Group · Sarawak, Malaysia

WHO WE ARE & WHERE WE COME FROM

We are a Sarawak-rooted, multi-business group shaped by decades of responsibly managing forests, tree and oil palm plantations and infrastructure. Our heritage is built on long-term partnerships with employees, customers, communities, and public administrations. Known for reliability and professionalism, we have supported regional development for generations. Today, we are building on this foundation to evolve into a more sustainable, innovative, and forward-looking group that is embarking to meet global expectations for responsible land use, traceable products, and ethical business practices. We acknowledge that our journey has not been without challenges, and we are committed to learning from the past while strengthening transparency, accountability, and respect for people and nature.

OUR MISSION – WHAT WE AIM TO ACHIEVE

We manage forests, plantations, and land with care, and we build the infrastructure that supports the communities around us, specifically in places where our presence carries a social responsibility. Our focus is good planning, safe operations, open and honest communication, and doing the work the right way. We strengthen our businesses by responsibly creating value across the value chain. By combining careful land management with integrated operations, we aim to deliver reliable, high-quality and traceable products, use resources efficiently, and ensure that the value created contributes to long-term economic resilience for the company and the region. Our employees' loyalty and experience are among our greatest strengths. We aim to develop our people so they can grow with the company as we move further into plantations, carbon, and new green products. We want to do things the best way possible, run resilient, efficient operations that support the livelihoods of our workers, communities, and partners globally, while contributing to Sarawak's shift toward a more sustainable use of its natural resources.

OUR VISION – WHERE WE ARE GOING

To be one of Southeast Asia's trusted and forward-looking agricultural, forest, and infrastructure group, recognized for responsible operations, strong community partnerships, high-quality and traceable products, empowered people, and leadership in the green economy.

SAMLING

OUR VALUES

OUR VALUES

1. Integrity & Accountability

- We will act transparently, honour commitments, comply with all laws and applicable standards, and take responsibility for our impacts; past, present, and future.

2. Respect for People & Communities

- We will engage openly, fairly, and respectfully with employees, workers, and communities, ensuring their voices shape decisions that affect them.

3. Stewardship of Nature & Resources

- We will manage forests, land, water, and biodiversity responsibly across all our operations, integrating conservation and climate action into long-term business strategy.

4. Innovation & Continuous Improvement

- We will embrace technology, data, digitalization, and new ideas to improve products, operations, environmental outcomes, and community benefits.

5. Efficiency, Professionalism & Financial Discipline

- We will operate systematically, enhance productivity, and manage risks responsibly to ensure long-term profitability and customer trust.

6. Partnership & Long-Term Commitment

- We will build enduring relationships with customers, communities, governments, and financial institutions to enable win-win situations and resilient regional development.

OUR COMMITMENTS

HOW WE WILL FULFIL OUR MISSION - OUR COMMITMENTS

Responsible, Transparent Management of Natural Resources

- Manage forests, plantations, and agricultural land in line with leading certification systems, legal compliance, and international due diligence expectations.
- Strengthen traceability, data integrity, and environmental safeguards to meet increasing expectations from customers, civil society, governments, and financial institutions.
- Integrate conservation, carbon, biodiversity protection, and sustainable production within a long-term landscape approach.

Community Partnership & Shared Prosperity

- Engage openly and consistently with local and indigenous communities through FPIC-aligned processes, fair benefit-sharing, and respect for land rights and cultural values.
- Further improve livelihoods by creating long-term employment, maintaining occupational health and safety of our workers, supporting infrastructure, and enabling economic resilience in rural regions.

Innovation & Green Economy Leadership

- Invest in renewable products, carbon projects, digital systems, improved agricultural and forestry practices, and nature-based solutions.
- Build internal competence and develop the next generation of leaders capable of driving sustainability, technology, and green growth.
- Strengthen R&D to align with emerging global market expectations for environmentally and socially responsible products.

Integrity, Professionalism & Transparency

- Honour commitments and provide high-quality products and accurate, timely information to customers, financiers, regulators, and stakeholders.
- Address legacy concerns with transparency, honesty and in a structured manner.
- Strengthen governance, audit systems, and decision-making processes for greater consistency and reliability.

Efficiency & Profitability for Long-Term Stability

- Improve operational efficiency, productivity, and systematic workflows to ensure resilience and competitiveness.
- Reinforce disciplined capital allocation, risk management, and cost-effective operations to generate sustainable returns.
- Maintain financial stability that reassures customers and financial institutions of our long-term ability to supply, operate, and honour agreements.

Building Resilient Infrastructure for Development

- Deliver reliable infrastructure that supports regional development, community well-being, and customer supply chains within the area we operate.
- Operate infrastructure projects with safety, environmental care, and long-term value in mind.

A Transformation Built on Accountability

Samling Group's ESG Roadmap and Transformative Action Plan sets out a structured, group-wide programme to embed environmental, social and governance excellence across every business unit. It moves beyond statements of intent to a delivery framework: defined objectives, named accountabilities, measurable key performance indicators and time-bound milestones.

The roadmap responds to the expectations of communities, customers, certification bodies, regulators and civil society. It is anchored in the principle that a credible social licence to operate is earned through rights-based engagement, transparent disclosure and demonstrable performance — not asserted.

8	21	69	2030
Strategic Pillars	Concrete Objectives	Tracked Actions	Certified Supply Target

The plan is organized around eight interconnected pillars — from a governance reset that establishes clear ESG accountability, through community legitimacy, sustainable sourcing, climate transition and natural capital stewardship, to transparent compliance, structured stakeholder dialogue and proactive communication. Each pillar carries specific objectives and a portfolio of actions with defined KPIs and due dates.

> ***"A credible social licence to operate is earned through rights-based engagement, transparent disclosure and demonstrable performance — and renewed every single day."***
>
> **Samling Group Management**

Delivery is overseen at executive level, with progress reviewed on a recurring cycle and reported to the Executive Committee. The roadmap is a living instrument — reviewed and updated as actions are completed, standards evolve and stakeholder priorities shift.

Eight Pillars, One Direction

The roadmap integrates eight strategic targets into a single, coherent transformation agenda. Each pillar addresses a distinct dimension of ESG performance while reinforcing the others — governance underpins accountability, sourcing and climate drive operational change, and engagement and disclosure sustain trust.

I	**Governance Reset & Institutional Alignment** Embedding accountable, group-wide governance with clear taskforce accountability, standardised reporting and executive oversight.	15 ACTIONS
II	**Community Legitimacy & Social License** Earning and sustaining community trust through rights-based engagement, robust grievance handling and equitable benefit-sharing.	9 ACTIONS
III	**Sustainable Sourcing & Supply Chain Transformation** Achieving deforestation-free, traceable and certified timber and oil palm supply chains across all operations.	14 ACTIONS
IV	**Climate Transition & Decarbonisation Pathway** Building a science-aligned Net Zero pathway covering Scope 1, 2 and 3 emissions and operational decarbonisation.	5 ACTIONS
V	**Natural Capital & Ecosystem Stewardship** Delivering net-positive impact on biodiversity through conservation, restoration and high-integrity carbon projects.	6 ACTIONS
VI	**Transparent Governance & Compliance Excellence** Disclosing performance openly through internationally aligned reporting and a strong compliance management system.	7 ACTIONS
VII	**Structured Stakeholder Dialogue & Trust Building** Establishing good-faith, structured engagement and credible institutional partnerships for lasting trust.	10 ACTIONS
VIII	**Proactive ESG Communication & Public Disclosure** Communicating ESG performance proactively and transparently to anticipate concerns and rebuild reputation.	3 ACTIONS

STRATEGIC PILLAR

I

Governance Reset & Institutional Alignment

Embedding accountable, group-wide ESG governance with clear roles, standardised reporting and executive oversight.

Establish a fully integrated, group-wide ESG management system that embeds clear accountability, standardised reporting, and aligned decision-making processes across all business units, ensuring coherent internal execution and external communication.

1.1.1	Design, formally approve and publish a new group-wide ESG taskforce structure including defined reporting lines and governance bodies.	**Mar 2026**
1.1.2	Implement defined ESG taskforce roles, meeting formats and internal communication processes across all business units.	**Mar 2026**
1.1.3	Develop and formally endorse a consolidated "Samling Group ESG Roadmap and Transformative Action Plan" aligned with group strategy and approved by EXCO.	**Mar 2026**
1.1.4	Assign ownership for each ESG action to named managers and integrate ESG responsibilities into their performance objectives.	**Jul 2026**
1.1.5	Develop and implement a standardised quarterly ESG reporting framework for management oversight.	**Dec 2026**

Implement a harmonised ESG governance framework that standardises policies, procedures, roles, and escalation mechanisms across the group, ensuring consistency, transparency, and enforceability - as appropriate.

1.2.1	Develop, approve and roll out a group-wide Sustainability Policy including defined accountabilities - integrate internal stakeholder views.	**Sep 2026**
1.2.2	Review, simplify, consolidate and standardise all existing ESG-related policies into a harmonised policy framework.	**Jun 2027**

Strengthen and integrate Environmental Management and Occupational Health & Safety systems into a unified, risk-based management structure with measurable performance oversight across all operations.

1.3.1	Establish a centralised Environmental and Occupational Health & Safety coordination function with defined mandate.	**Jul 2026**
1.3.2	Define and implement standardised environmental performance indicators across all operations.	**Dec 2026**
1.3.3	Define and implement standardised occupational health and safety KPIs across all operations.	**Dec 2026**

Establish a centralised, digital ESG data management architecture that ensures data integrity, real-time performance tracking, automated monitoring where appropriate, and decision-ready reporting.

1.4.1	Create a dedicated ESG Data Management function.	**Jun 2026**
1.4.2	Assessment of automation possibilities for monitoring related tasks with implementing options.	**Dec 2026**
1.4.3	Develop and deploy a centralised ESG dashboard integrating environmental, social and governance data. (Data register is the basis)	**Jul 2027**

Ensure consistent implementation of ESG policies and SOPs through a risk-based internal control and audit system with defined corrective action mechanisms and executive oversight.

1.5.1	Establish an operational internal audit function for the timber division.	**Sep 2026**
1.5.2	Develop and approve a risk-based ESG-focused audit programme for the following reporting year.	**Dec 2026**

STRATEGIC PILLAR II

Community Legitimacy & Social License

Earning and sustaining community trust through rights-based engagement, robust grievance handling and equitable benefit-sharing.

Institutionalise Free, Prior and Informed Consent (FPIC) across all company operations through standardised procedures, documented consent processes, and independent oversight to ensure rights-based engagement.

2.1.1	Conduct a documented internal gap analysis of existing FPIC procedures against international standards.	**Jul 2026**
2.1.2	Revise and formally adopt updated FPIC policy and SOPs - align with internal stakeholders	**Dec 2026**
2.1.3	Identify improvement measures for the standard operating procedures	**Jul 2026**

Establish a centralised, accessible, transparent, and independently overseen grievance mechanism that effectively addresses new and legacy cases, strengthens trust with affected communities, and ensures timely resolution.

2.2.1	Develop and implement a standardised grievance guideline and digital case management tool - include stakeholder perspectives.	**Dec 2026**
2.2.2	Define and integrate criteria for addressing legacy grievances - include stakeholder perspectives.	**Sep 2026**
2.2.3	Establish an independent Indigenous Advisory Board with defined review mandate - it is being assessing escalated grievances and legacy grievances.	**Dec 2026**

Institutionalise structured cross-departmental collaboration between Community Engagement and Certification & Supply Chain Control functions to ensure integrated risk management and efficient process alignment.

2.3.1	Conduct structured strategy alignment workshop between CE and CSCC.	**Jun 2026**
2.3.2	Develop and implement 3-year training and development programme.	**Sep 2026**

Develop and implement transparent and equitable benefit-sharing mechanisms with local communities and rights holders, integrating stakeholder input and ensuring measurable socio-economic impact - specifically for carbon projects.

2.4.1	Develop and publish transparent benefit-sharing model for carbon projects - integrate stakeholder perspectives.	**Dec 2026**

STRATEGIC PILLAR III

Sustainable Sourcing & Supply Chain Transformation

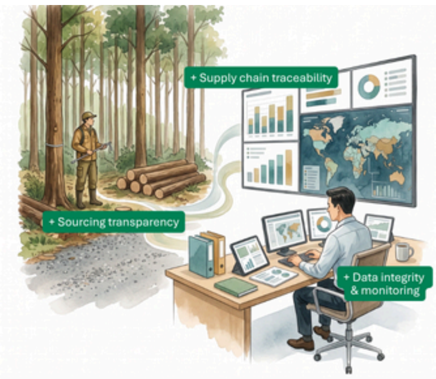
Achieving deforestation-free, traceable and certified timber and oil palm supply chains across all operations.

Achieve full operational implementation of the Group-wide traceability policy across 100% of owned operations and active Tier-1 suppliers, including risk-based due diligence, satellite monitoring, and traceability to origin for all timber and oil palm supply chains.

3.1.1	Develop and formally adopt group-wide traceability policy - align with all internal stakeholders	**Sep 2026**
3.1.2	Develop and implement timber sourcing policy aligned with traceability policy.	**Jul 2026**
3.1.2.a	Redo FFB sourcing policy aligned with traceability policy.	**Sep 2026**
3.1.3	Update (controlled sources) due diligence system to assess deforestation and legality concerns along the timber supply chains	**Sep 2026**
3.1.4	Update due diligence system to assess deforestation and legality concerns along the oil palm supply chains	**Sep 2026**
3.1.5	Develop a sound traceability process, consider the implementation of a digital traceability system for timber	**Dec 2026**
3.1.5.a	Digitisation of audit process	**Dec 2026**
3.1.6	Develop a sound traceability process, consider the implementation of a digital traceability system for fresh fruit bunches (OP)	**Dec 2026**
3.1.7	Standardise and centralise the management of land claims and licensed area deviations (e.g. encroachments).	**Dec 2026**
3.1.8	Implement satellite-based monitoring and control procedures for deforestation risk management.	**Dec 2026**

Ensure that 100% of timber and oil palm supply originates from independently certified forests and plantations by 2030, supported by supplier engagement and transition mechanisms.

3.2.1	Maintain the MTCC and PEFC for all own managed forests and plantations from which the company sources timber.	**Dec 2028**
3.2.2	Certify all newly acquired plantations within two years of acquisition.	**Dec 2030**
3.2.3	Apply and maintain MSPO certification for all managed oil palm plantations.	**Dec 2026**
3.2.4	Develop a supplier engagement strategy to transition suppliers toward certification.	**Dec 2027**



STRATEGIC PILLAR
IV

Climate Transition & Decarbonisation Pathway

Building a science-aligned Net Zero pathway covering Scope 1, 2 and 3 emissions and operational decarbonisation.

Develop and implement a science-aligned Net Zero transition pathway covering Scope 1, 2 and 3 emissions, integrating operational decarbonisation, supply chain engagement, and capital allocation planning.

4.1.1	Collect verified primary data and calculate Scope 1 and 2 emissions.	**Dec 2026**
4.1.2	Develop a Scope 3 emissions assessment methodology and roadmap.	**Dec 2027**
4.1.3	Conduct a standardised climate risk and opportunity assessment.	**Dec 2026**
4.1.4	Develop a prioritised energy efficiency action plan for operations.	**Jul 2027**
4.1.5	Develop a costed Net Zero transition plan aligned with 2050 target - with internal stakeholder engagement.	**Dec 2028**

STRATEGIC PILLAR

V

Natural Capital & Ecosystem Stewardship

Delivering net-positive impact on biodiversity through conservation, restoration and high-integrity carbon projects.

Deliver a measurable net positive impact on biodiversity and ecosystems across the value chain by 2035 (baseline 2020), integrating conservation, restoration, and ecosystem-level approaches.

Institutionalise the suspension of natural forest harvesting and transform natural forest assets into integrated nature-based and ecosystem-level conservation and carbon management systems.

5.2.1	Develop an ecosystem-level project concept integrating carbon and biodiversity objectives.	**Dec 2026**
5.2.2	Initiate formal dialogue with government (FDS/Ministry) to integrate FTL areas into ecosystem solutions.	**Jul 2026**

Develop and certify high-integrity carbon projects on former licensed forest/plantation areas, aligned with recognised international standards and integrated into a broader ecosystem strategy.

5.3.1	Implement and certify the Marudi carbon project under Verra standards.	**Dec 2026**
5.3.2	Apply for additional carbon study licenses for new project areas	**Dec 2026**

STRATEGIC PILLAR

VI

Transparent Governance & Compliance Excellence

Disclosing performance openly through internationally aligned reporting and a strong compliance management system.

Provide structured, centralised, and easily accessible ESG-related information to stakeholders through a consolidated public information platform.

6.1.1	Create a centralised online ESG information hub.	**Sep 2026**

Publish regular, internationally aligned ESG and supply chain transparency reports that disclose performance, due diligence outcomes, corrective actions, and progress against targets.

6.2.1	Prepare an annual supply chain report - description of sourcing areas, due diligence system, identified corrective action requirements, improvement measures	**Mar 2027**
6.2.2	Publish GRI-aligned sustainability report for timber operations. (Lingui)	**Sep 2026**
6.2.3	Report publicly available and aligned with GRI Standards. (Glenealy)	**Sep 2026**
6.2.4	Conduct gap analysis for TCFD/ISSB reporting alignment.	**Sep 2027**
6.2.5	Publish voluntary TCFD/ISSB-aligned ESG report for FY 27 - consider joint reporting on Timber and OP	**Sep 2028**

Strengthen corporate integrity through a comprehensive compliance management system that proactively identifies, mitigates, and monitors ESG-related legal and ethical risks.

6.3.1	Maintain ISO 37001 anti-corruption management system.	**Dec 2026**

STRATEGIC PILLAR

VII

Structured Stakeholder Dialogue & Trust Building

Establishing good-faith, structured engagement and credible institutional partnerships for lasting trust.

Establish structured, good-faith stakeholder engagement mechanisms that enable dialogue, conflict prevention, informed decision-making, and long-term relationship building.

7.1.1	Develop and approve an Open-Door Policy including anti-SLAPP commitment.	**Jul 2026**
7.1.2	Identify relevant key stakeholder groups and formally invite them to a dialogue	**Jun 2026**
7.1.3	Establish a structured recurring stakeholder dialogue format, for regular exchange of views and information.	**Dec 2026**
7.1.4	Establish a formal multi-stakeholder platform.	**Dec 2026**
7.1.5	Launch a stakeholder engagement pilot project in Marudi - conflict resolution.	**Dec 2026**

Develop formalised partnerships with relevant national and international institutions to enhance credibility, oversight, knowledge exchange, and collaborative problem-solving.

7.2.1	Conduct constructive negotiations on the start of a formal FSC Remedy Process	**Mar 2026**
7.2.2	Formalise collaboration with MTCC and PEFC International.	**Jun 2026**
7.2.3	Continue the collaboration with MSPO, MPOB and BORA	**Dec 2026**
7.2.4	Conduct direct engagement with identified international stakeholders - perform information meetings.	**Dec 2026**
7.2.5	Establish partnership with FDS for landscape NSB development.	**Sep 2026**

STRATEGIC PILLAR

VIII

Proactive ESG Communication & Public Disclosure

Communicating ESG performance proactively and transparently to anticipate concerns and rebuild reputation.

Implement a proactive and strategically aligned internal and external communication framework that transparently reports ESG performance, anticipates stakeholder concerns, and supports reputation recovery.

8.1.1	Develop and implement a proactive ESG social media strategy.	**Ongoing**
8.1.2	Implement a rolling three-month editorial communication plan.	**Mar 2026**
8.1.3	Establish an internal ESG communication alignment process with top management.	**Mar 2026**

Transformation Timeline 2026–2030

■ Governance ■ Community ■ Sourcing ■ Climate ■ Nature ■ Transparency ■ Stakeholder ■ Communication

2026 Q1 FOUNDATION	2026 Q2 MOBILIZE	2026 Q3 POLICY & SOURCING	2026 Q4 SYSTEMS LIVE	2027 CONSOLIDATE	2028 DISCLOSE	2030 EMBED
Group-wide ESG governance structure approved & published. Consolidated ESG Roadmap endorsed by EXCO. FSC Remedy Process negotiations initiated. Rolling editorial & internal communication alignment in place.	Dedicated ESG Data Management function created. Key stakeholder groups identified & invited to dialogue. Collaboration with MTCC & PEFC International formalised. CE–Supply Chain strategy alignment workshop held.	Group-wide traceability policy adopted; timber & FFB sourcing aligned. Due diligence systems updated for deforestation & legality. FPIC gap analysis & legacy-grievance criteria defined.	Traceability & satellite monitoring operational; MSPO maintained. Scope 1 & 2 emissions inventory completed & disclosed. Standardised quarterly ESG reporting & E/OHS KPIs in place.	Annual supply chain transparency report published. Scope 3 methodology & energy efficiency plan developed. Supplier certification transition strategy approved.	Voluntary TCFD/ISSB-aligned ESG report published (FY27). Sustainable Forest Management (MTCC) certification maintained. Costed Net Zero transition plan aligned to 2050 approved.	100% certified supply target — new plantations certified within 2 years. Natural forest harvesting suspension sustained.

Indicative target dates per the Samling Group ESG Roadmap & Transformative Action Plan (Status: May 2026). 2026 shown by quarter; 2027–2030 by year. Two actions are continuous/ongoing and not date-bound.