

Navigating the National Sustainability Reporting Framework: Insights on Implementation



Agenda

- 1 Overview of NSRF Requirements: A Recap
- 2 How Will IFRS Sustainability Disclosure Standards Impact Your Reporting?
- 3 Common Questions from the Audit Committee
- 4 Implementation Challenges and Next Steps



Overview of NSRF Requirements: A Recap

PLCs will be issuing sustainability report under the IFRS Sustainability Disclosure Standards, starting with Group 1 for FY2025

Implementation of NSRF will be done through a phased approach from annual reporting periods beginning on or after 1 January 2025

Mandatory reporting:

- Applies to all listed issuers and non-listed companies with revenue above RM2 billion
- Reports must adhere to IFRS S1 and IFRS S2 (IFRS SDS).
- Must include Scope 3 GHG emissions disclosure

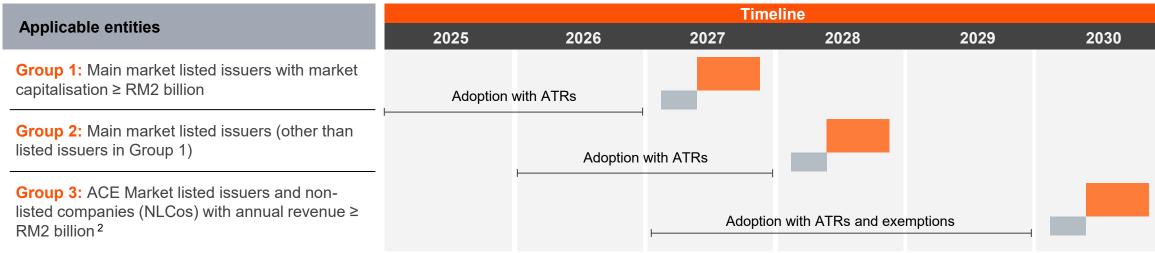
Transition reliefs & exemptions:

Facilitate phased adoption from 2025 to 2030

Location and timing of reporting:

 Follow specific regulator requirements for disclosure location and reporting timing.

Table 1: Implementation timeline for IFRS SDS





Full adoption of IFRS Sustainability Disclosure Standards with Scope 3 GHG emissions disclosures

¹ Annual reporting periods beginning on or after 1 January 20XX (e.g., 2025 refers to annual reports that cover period from 1 January to 31 December 2025)

² Large NLCos whose holding company already reports using ISSB-aligned standards or equivalent standards such as ESRS may leverage on the holding's company disclosures (subject to additional guidance to be issued)

Update: SC has also issued a consultation paper on assurance that widen the scope of assurance - covering IFRS S1 Core Contents in addition to GHG Emissions

External assurance requirements

To ensure reliability of sustainability disclosure and to address concerns on greenwashing, the NSRF aims to mandate:

- Reasonable assurance¹ based on the timeline summarised in Table 2, subject to further consultation with relevant stakeholders
- Assurance engagements to be performed in accordance with the assurance standards as adopted by the Malaysian Institute of Accountants (MIA)



Public consultation closed on 6 August 2025

Table 2: External assurance timeline

Reasonable assurance for annual reporting periods beginning on or after

	Scope 1 & Scope 2 GHG emissions	IFRS S1 core contents and Scope 3 GHG emissions
Group 1	1 January 2027	1 January 2030
Group 2	1 January 2028	1 January 2031
Group 3	1 January 2029	1 January 2033

Source: Securities Commission's Public Consultation Paper (No. 2/2025) on Proposed Framework for Sustainability Assurance

Audit Committee is expected to address these three areas in sustainability oversight: Disclosure, Processes and Controls, Assurance







Disclosure

What audit committees may want to ask?

- What has management identified as the company's sustainability-related risks and opportunities (SROs)?
- Which sustainability frameworks or standards are the company required to use and which are it using voluntarily?
- Are other domestic or foreign requirements for the company on the horizon?

Process and Controls

What audit committees may want to ask?

- How is the company collecting sustainability information?
- What systems, processes and controls are in place to ensure that quality sustainability information is produced for both voluntary and mandatory disclosures?
- What additional resources may be necessary to implement new sustainability processes and controls?

Assurance

What audit committees may want to ask?

- Have investors or other stakeholders requested assurance over the sustainability reporting?
- If so, have they indicated what level of assurance they prefer?
- How has management considered the impact some level of assurance might have on stakeholder confidence in the disclosures?

How Will IFRS
Sustainability
Disclosure
Standards Impact
Your Reporting?



This represents a fundamental change in Sustainability Statements, now focusing on providing investor-focused information

Fundamental shift in structure and content of the Sustainability Statements by focusing on investor-grade information

[2024] Bursa's Sustainability Reporting Guide

- Structured by material matters, covering Bursa's common sustainability matters and indicators previously required under the Main Market Listing Rules by Bursa Malaysia
- Information is for the wider stakeholders' consumption e.g. employees, nongovernmental organisations (NGOs), communities, investors, etc.

[2025] After the adoption of IFRS S1 and IFRS S2

- Emphasises on material sustainability-related financial information on sustainability risks and opportunities ("SRO") that are reasonably expected to affect the prospects of the entity
- Investor-grade information that are verifiable, reliable and where required, externally assured.
- Designed for use by primary users of general purpose financial reports e.g. investors, creditors and other lenders

Greater connectivity between Sustainability Statements and the financial statements is expected

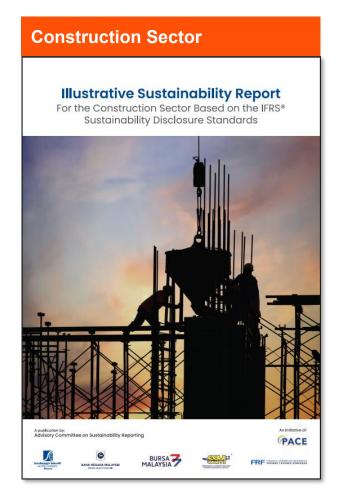
The identified SROs will serve as a driver to assess the anticipated financial performance, position and cash flows in the financial statements.

Areas of connectivity with the financial statements (non-exhaustive)

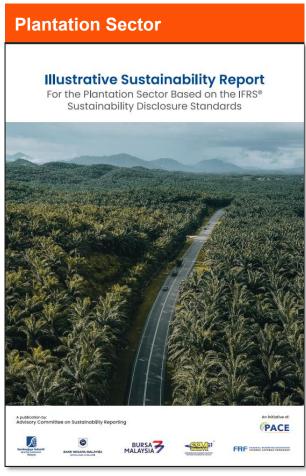
- Reporting boundary for the Sustainability Statements
- · Judgement and measurement uncertainties
- · Current period financial effects
- · Anticipated financial effects
- · Climate resilience
- · Events after reporting period

- Is consolidated entities consistent with financial statements?
- Can the financial effects be cross-referenced to the financial statements?
- Are the assumptions used consistent with the financial statements?
- The financial effects of SROs are quantified and disclosed based on the financial materiality concept
 - SROs are identified through analysis of the Group's dependencies on resources and relationships across its operations and value chain
 - Assessed using financial materiality lens, based on the <u>likelihood</u> and <u>magnitude</u> of the risk occurring
 - Entities' enterprise risk management framework needs to be updated to integrate sustainability-related risk management process.

The Advisory Committee on Sustainability Reporting (ACSR) has issued the following draft Illustrative Sustainability Reports (ISR)



Source: Illustrative Sustainability Report (ISR) - Construction Sector



Source: <u>Illustrative Sustainability Report (ISR) - Plantation</u> Sector

- Tailored for Malaysian listed issuers and offer a visual guide for those preparing sustainability disclosures aligned with the NSRF.
- Illustrate how entities may structure their sustainability report for the financial year ending 31 December 2025 in line with the IFRS® Sustainability Disclosure Standards (IFRS SDS) issued by the International Sustainability Standards Board (ISSB), and Bursa Malaysia's Main Market Listing Requirements (MMLR).
- This ISR is prepared based on the requirements of these two standards and do not include any subsequent new standards or amendments issued on or after 30 June 2025

Find out more on Securities Commission Malaysia's website: https://www.sc.com.my/nsrf/resources/policy-documents

Structure of the ISRs

Content

- Basis of preparation
- Overview of the company and value chain
- Reporting boundary
- Judgements and measurement uncertainty
- Materiality assessment
- Sustainability governance
- Environmental-related risks
- Social-related risks
- · Events after the reporting period
- Additional disclosures based on the Main Market Listing Requirements

Appendices

Reporting framework/criteria (Full compliance):

- IFRS S1 "General Requirements for Disclosure of Sustainability-related Financial Information" (IFRS S1)
- IFRS S2 "Climate-related Disclosures" (IFRS S2)
- Bursa Malaysia's Main Market Listing Requirements on Sustainability Reporting (Sustainability Accounting Standards Board (SASB) standards as primary source of guidance)

For each risk illustrated:

- Description of risk, including effects on business model & value chain, strategy & decision making, financial effects, climate resilience and significant uncertainty (if any)
- Processes, controls and policies to manage risks
- Metrics and targets

Not part of the ISR but intended to provide additional guidance for preparers:

Appendix I: Transition reliefs

Covered in Step 1

Appendix II: References to GRI



Refer to "Key considerations in preparing the sustainability report"

Appendix III: Sustainabilityrelated opportunities



Covered in Step 3 and Step 4

Note: For the purpose of both ISRs, only three sustainability-related risks are illustrated. This ISRs also do not illustrate disclosures related to sustainability-related opportunities.



Common Questions from the Audit Committee

We have compiled the common questions from Audit Committee members on adoption of the IFRS Sustainability Disclosure Standards, summarised into four areas below

01

02

03

04

Report Structure

There will be structural change in the sustainability statement – bringing it closer to how financial statements are structured.

Linkages to Financial Statements

The inclusion of financial-related sustainability disclosures, encompassing current and anticipated financial impacts, raises questions about the roles of the Finance function and the Audit Committee.

Data and Governance

Some financial-related sustainability information will be reported for the first time and, due to its reliance on significant management assumptions, will require more rigorous internal review.

Assurance

In some PLCs, the role of appointing and reviewing the work of independent assurance provider sits with the Audit Committee.

Common Questions from the Audit Committee – Report Structure









How will the report look like?

- There is a shift from reporting material matters (based on GRI Standards, based on impact materiality) to SROs (based on financial materiality)
- Refer to the ISR issued by the ACSR for example of Sustainability Report/Statement under IFRS Sustainability Disclosure Standards

We are adopting the climatefirst transition relief, can we still report on other topics?

- If climate-first approach is adopted, the reporters should not be reporting other topics under IFRS S1 (no cherry picking of topics)
- This is not to "obscure" the reporting that is being made under the IFRS S1 and IFRS S2, together with the transition reliefs adopted

On the full adoption of IFRS SDS, do we still need to issue a separate report?

- IFRS SDS is focusing on financial materiality lens and does not address impact materiality
- Depending on the expectation of its stakeholders, reporters in certain sectors/markets might consider issuing an additional sustainability report focusing on the impact materiality lens.

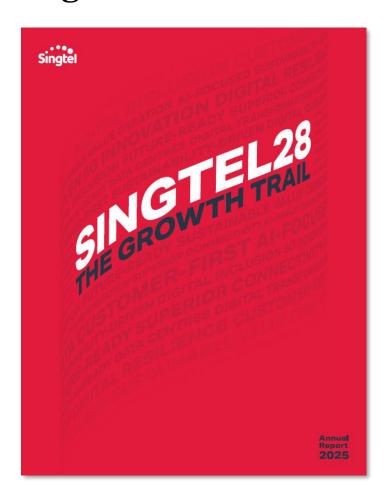
Can we spread the IFRS SDS information across the annual report and prepare a table index to map the disclosure?

The disclosure should not be obscured, which includes: (non-exhaustive)

- scattered throughout the report
- hidden by immaterial information, resulting in reader unable to determine what is material

How will the report look like?

- We have seen issuance of a more formal sustainability statement, aligned with our ISR



A separate section of <u>climate-related</u> disclosure was included as part of the Annual Report (1/2)

SUPPLEMENTARY CLIMATE-RELATED FINANCIAL DISCLOSURES

1. BASIS OF PREPARATION

The climate-related financial disclosures are prepared in compliance with SGX Listing Rule 711B (1) (aa) to disclose information on climate-related risks and opportunities based on the climate-relevant rovisions in IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures (other than the disclosure of Scope 3 greenhouse gas emissions as set out in paragraph 4.23 of the Practice Note 7.6).

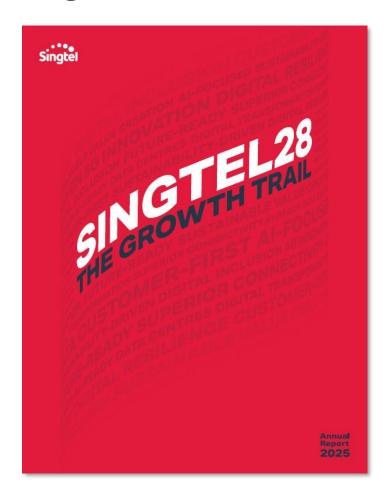
This report has been prepared for the same consolidated reporting entity and reporting period as the Group's Consolidated Financial Statements. The presentation currency of the climate-related financial disclosures is the Singapore Dollar (S\$), which aligns with the Group's Consolidated Financial Statements, and amounts disclosed are rounded to the nearest million unless otherwise stated.

In preparing the climate-related financial disclosures, management has exercised judgement regarding format, structure and the materiality of information, primarily focusing on information that would be useful to investors and creditors in making decisions relating to providing resources to the Group. The Group is committed to aligning its disclosures with evolving industry practice, where limited precedents currently exist. To address the information needs of broader stakeholders concerning the Group's wider approach to climate and impact, the yearly Singtel Group Sustainability Report is issued concurrently with the Singtel Group Annual Report.

Prepared in accordance with the listing rule as well as IFRS S1 and IFRS S2

How will the report look like?

- We have seen issuance of a more formal sustainability statement, aligned with our ISR



A separate section of <u>climate-related</u> disclosure was included as part of the Annual Report (2/2)

SUPPLEMENTARY CLIMATE-RELATED FINANCIAL DISCLOSURES

BASIS OF PREPARATION

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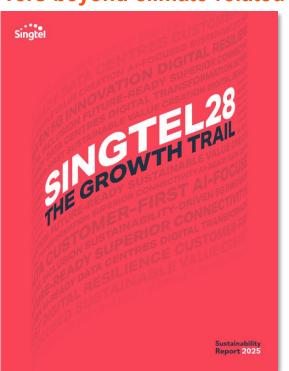
Prepared with the same consolidated Group as the financial statements

How will the report look like?

- Different sustainability statements and report issued for different stakeholders needs



In addition, Singtel also issued a separate sustainability report in accordance with other sustainability reporting framework and industry needs. This repot covers beyond climate-related disclosures



Reporting standards

This report has been prepared to be in accordance with the globally recognised GRI Universal Standards 2021 It complies with SGX Listing Rule 711 (A) and (B) and includes SGX's 27 Core ESG Metrics.

We have also incorporated in our AR2025 the Climate-related Financial Disclosures required under SGX Practice Note 7.6 Sustainability Reporting Guide. The details can be found under the Supplementary Climate-related Financial Disclosures section of AR2025 from page 236.

Building on our previous disclosures addressing the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), we are progressively incorporating selected climate-related disclosures from the requirements of International Financial Reporting Standards (IFRS) S2, issued by the International Sustainability Standards Board (ISSB), and consequently the climate-relevant provisions in IFRS S1. This positions Singtel Group to meet the upcoming Singapore Exchange Regulation (SGX RegCo) enhanced sustainability reporting regime.

In addition, this report contains disclosures recommended by SASB Standards based on the Telecommunications Services (Industry Standard, Version 2 18-10) and CSM Association (CSMA) ESC Metrics for Mobile for the mobile industry.

Common Questions from the Audit Committee

Linkages to Financial Statements









Why this is important?

- Connectivity
- Significant judgement and estimates made

Will we need to include the IFRS S1 and IFRS S2 disclosures in the financial statements?

- The IFRS S1 and IFRS S2 disclosures will be made as part of the sustainability statement and not in the financials statements
- However, <u>connectivity is required</u>
 and cross refences could be made in
 the sustainability statements/report
 to the financial statements

Will the FS disclosure be affected?

- Disclosure improvement on the impact of climate-related risks and opportunities are expected.
- A near-final staff draft of "Disclosures about Uncertainties in the Financial Statements Illustrated using Climate-related Examples" was issued in July 2025 which provide six illustrative examples for preparer of financial statements.

With increased disclosure, will there be more impairment?

- Not necessarily With connectivity requirements between FS and SS, anticipated financial effects must align with entity's business plan, strategy and annual budget; consistent with any existing impairment assessment
- Impairment is likely if climaterelated risks were not considered.

Can we still issue the sustainability report much later than the financial statements?

- IFRS S1 requires the report to be issued at the same time as the related financial statements
- In addition, Bursa Malaysia has required that the sustainability statement to be issued by the mandatory annual report timeline.

What does connectivity entail?

- An example from the ISR for the plantation section (1/3)

1.2 Connectivity with financial statements (reporting period, reporting entity, and presentation currency)

The sustainability report has been prepared for the Group and should be read in conjunction with the Group's consolidated financial statements which are prepared in accordance with the Malaysian Financial Reporting Standards (MFRS), IFRS Accounting Standards and the requirements of the Companies Act 2016 in Malaysia. This report covers the financial year ended 31 December 2025 and is aligned with the reporting period of the related consolidated financial statements.

The Group defines time horizons based on when the sustainability-related risks and opportunities could reasonably be expected to occur. As of the end of the reporting period the following time-horizons were identified which align with the timelines used for strategic decision-making:

- short term (0 to 12 months)
- · medium term (1 to 5 years)
- · long term (beyond 5 years)

The sustainability-related financial disclosures cover the same reporting entity at the related consolidated financial statements. The reporting entity comprises the parent company, Yielding Value Berhad and its subsidiaries. In preparing these sustainability-related financial disclosures, the Group has assessed its own operations and its value chain which includes, amongst others, the joint ventures and associates of the Group. Refer to Note 2.2 for information on the value chain.

Source: Illustrative Sustainability Report (ISR) - Plantation Sector

 The sustainability statement/report should be read in conjunction with the Group's consolidated financial statements

Covers the same reporting entity as the Group's consolidated financial statements

What does connectivity entail?

- An example from the ISR for the plantation section (2/3)

Information considered

3.1 Reporting boundary (excluding GHG emissions)

Reporting entity

Entities and assets in the

The entities, assets and operations (referred to as the 'reporting entity') included in the Group's sustainability report are the same as those included in the Group's 31 December 2025 financial statements. During the reporting period, there was the following change to the Group structure:

 Acquisition: on 1 October 2025, the Group acquired 70% of the issued share capital of Solar Group, a large-scale solar farm (refer to Note [XX] in the Group's 31 December 2025 financial statements for more details). Where material, information about sustainability-related risks and opportunities is identified and disclosed from the acquisition date. Comparative amounts are not adjusted to include amounts relating to acquisitions in the current year.

The Group's reporting entity and the extent of sustainability-related information considered and included in the Group's consolidated sustainability report are summarised below:

Note in

Additional information

	reporting entity		financial statements	and included (for GHG reporting boundary see Note 3.2)
-	Parent and subsidiaries		Note [XX]	100% of the sustainability information, including consolidated subsidiaries which are not fully owned.
	Leased assets (the Group is lessee)	The Group leases various offices, warehouses, land, equipment and vehicles. The Group has the right to control the use of the asset as well as the right to substantially all of the related economic benefits during the term of the lease.	Note [XX]	100% of the sustainability information related to the use of the leased assets during the lease term.
	Leased assets (the Group is lessor)	The Group has investment properties that it leases to tenants under operating leases. The investment property continues to be recognised on the Group's statement of financial position.	Note [XX]	100% of the sustainability-information related to the leased assets.

Disclosure over the Group's reporting boundary, which make references to the acquisition of a large-scale solar farm in Note XX to the financial statements

Disclosure on subsidiaries and lease assets in the financial statements

Source: Illustrative Sustainability Report (ISR) - Plantation Sector

What does connectivity entail?

- An example from the ISR for the plantation section (3/3)

c. Effect on strategy and decision making

To address and mitigate the impact of risks from extreme weather events, management has set up a strategic climate plan which includes several mitigation and adaptation actions, as follows:

- Extreme weather events Advancement in genomic research: Recognising the impacts of climate change, the Group is prioritising genomic research to develop weather-resilient and high-yield seedlings. The Group seeks to cultivate oil palm varieties that are more resistant to extreme weather conditions but also produce higher yields on less land. This approach enables the Group to optimise plantation areas, allowing for the allocation of more land as high conservation areas.
- Extreme weather events Collaboration with suppliers: A significant portion of the Group's raw materials, including FFBs, is sourced from nearby third-party estates and mills that face similar physical climate risks. To address these risks, the Group collaborates with its suppliers, who are mainly smallholders, to ensure they implement adequate mitigation strategies. This collaboration is part of the Group's ongoing efforts to engage with and assist its suppliers in obtaining sustainable oil palm certification.
- Prolonged heatwave Increased mechanisation: The Group is continuously investing in advanced mechanisation initiatives across its estates. It aims to enhance its operational efficiency, reduce the requirements of manual labour and improve productivity. This transition aims to support economic sustainability, enhance workplace safety and reduce the physical strain on workers.
 the year, the Group has started to include this improved infrastructure across its estates to etter support accessibility of machines within its plantation.
- Prolonged heatwave Implementation of water management system: To mitigate the
 impacts of prolonged heatwaves on its operation, the Group has invested in efficient irrigation
 systems, along with rainwater harvesting and the use of mulch or cover crops to enhance water
 management and retention. The Group has also invested in large-capacity tanks or cisterns to store
 water collected from various sources across its upstream and downstream operations.
- Heavy rainfall Construction of flood adaptation measures: For its high-risks locations, the
 Group is focused on implementing flood prevention strategies, such as construction of bunds for
 coastal plantations and improving drainage systems for estates within the Group. Current and
 upcoming replanting plans have taken into account each site's susceptibility to flooding risk and the
 measures and investments required to manage these risks.

The Group's mitigation and adaptation strategy above is designed to address moderate levels of climate-related risks, including the risks of extreme weather events (see Scenario 2 in the scenario analysis included below).

The Group plans to use self-funding and existing human resources to implement these strategies.

d. Financial effects

Are these information consistent with the financial statements?

Current financial effects

The current financial effects on extreme weather events to the Group's financial position, financial performance, and cash flows are primarily driven by ongoing mitigation and adaption effort to ensure continuous supply of FFB and CPO throughout the year.

The extreme weather patterns have affected the oil palm yield on the affected plantations for the year, where the average OER of these estates have decreased to 19.76% as compared to 20.2% in the previous year. The estimated impact from the reduction in yield and OER resulted in a decrease in revenue by RM2.4 million during the year.

Additionally, flooding that affected 28 estates during the financial year has led to inventory losses, including fertilisers and FFBs, as well as loss of bearer plants at two (2) estates. Inventory losses amounted to RM2.5 million, whilst RM1.1 million worth of bearer plants were written off from the statement of financial position during the financial year. These details have been disclosed in Note [XX] and Note [XX] of the Group's financial statements.

To mitigate these risks in the future, the Group has invested and capitalised RM28.2 million on installation of flood and heatwave mitigation measures across its estates and mills. Additionally, the Group spent RM4.8 million on R&D activities to develop more weather-resistant seedling during the financial year. Of this RM4.8 million cash outflow, RM1.7 million was capitalised as intangibles in the statement of financial position while the remaining RM3.1 million was expensed off in the statement of comprehensive income, impacting the Group's 31 December 2025 financial performance and cash flows.

The Group's repair and maintenance costs for drainage amounted to RM6.9 million during the year an increase of RM0.5 million compared to the previous reporting period.

The Group's initiative to collaborate with its suppliers has been integrated as part of the organisation's business processes and controls, which are addressed by its current workforce.

- Impact of flooding that occurred during the reporting period
- Investments arising from sustainability strategy, with linkages to relevant financial statement line items

PwC Source: Illustrative Sustainability Report (ISR) - Plantation Sector

Common Questions from the Audit Committee

Data and Governance









How should governance processes be structured for these information?

- The report are expected to disclose various information, such as SROs, sustainability (including decarbonisation) strategy, nonfinancial metrics, current and anticipated financial impacts, Board and executives KPIs.
- This requires involvement of various board committees.

What areas should the Audit Committee (AC) focus on regarding sustainability?

TOR for board committees will need to be updated. We have observed AC involvements in two areas:

- Reporting Review financial disclosures, namely financial effects and climate scenario analysis
- Assurance plan, appoint and review of internal audit and external assurance provider

How long does it take for organisations to be prepared to report under IFRS SDS?

Depending on size and complexity, the process can take from 3 to 8 months.

Where complexity will come in:

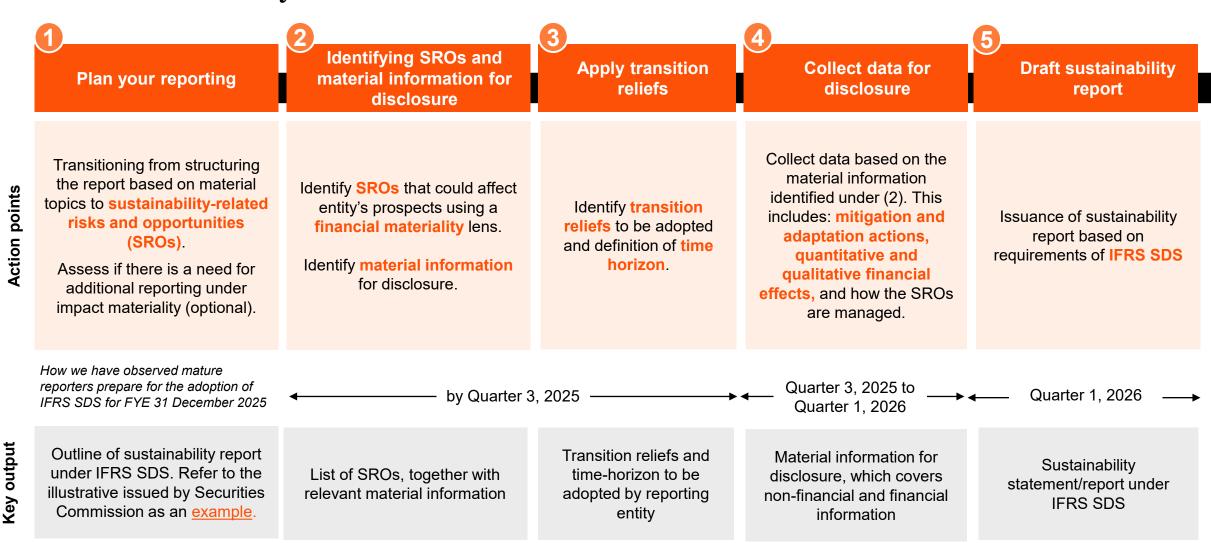
- Streamlining of business and sustainability (including decarb) strategy
- Quantification of financial effects
- · Use of estimates and proxy data

Could proxy data be used in absence of actual?

Yes. However, IFRS S1 requires disclosure of:

- significant judgement, such as materiality process, calculation methods for GHG emissions, etc
- measurement uncertainties, such as anticipated financial effects for carbon tax, emissions factors used, etc

What are the steps that organisations should take to be prepared to report under IFRS Sustainability Disclosure Standards?



How do we address data collection for a consolidated group? - A recap: The report should cover the same reporting entity as the FS

1.2 Connectivity with financial statements (reporting period, reporting entity, and presentation currency)

The sustainability report has been prepared for the Group and should be read in conjunction with the Group's consolidated financial statements which are prepared in accordance with the Malaysian Financial Reporting Standards (MFRS), IFRS Accounting Standards and the requirements of the Companies Act 2016 in Malaysia. This report covers the financial year ended 31 December 2025 and is aligned with the reporting period of the related consolidated financial statements.

The Group defines time horizons based on when the sustainability-related risks and opportunities could reasonably be expected to occur. As of the end of the reporting period the following time-horizons were identified which align with the timelines used for strategic decision-making:

- short term (0 to 12 months)
- · medium term (1 to 5 years)
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The sustainability-related financial disclosures cover the same reporting entity at the related consolidated financial statements. The reporting entity comprises the parent company, Yielding Value Berhad and its subsidiaries. In preparing these sustainability-related financial disclosures, the Group has assessed its own operations and its value chain which includes, amongst others, the joint ventures and associates of the Group. Refer to Note 2.2 for information on the value chain.

Source: Illustrative Sustainability Report (ISR) - Plantation Sector

The sustainability statement/report should be read in conjunction with the Group's consolidated financial statements

Covers the same reporting entity as the Group's consolidated financial statements

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Source: Illustrative Sustainability Report (ISR) - Plantation Sector



Do we need to include all information from all subsidiaries?

- Reporters SROs and related information are material under <u>financial</u> <u>materiality</u>
- Information is material if <u>omitting</u>, <u>misstating or obscuring that</u> <u>information could reasonably be expected to influence decisions</u> that primary users of general-purpose financial reports.



As a PLC in Group 1, we have listed subsidiary in Group 2. Should they prepare a sustainability statement for the year ending 31 December 2025?

- The Group 1 PLC must identify the relevant SROs and material information to report, including assessments of applicable business units for each SRO.
- While subsidiaries are not (yet) required to prepare their own sustainability statements, they may need to provide sustainability-related financial information to the holding company, similar to component reporting in financial statements.

Common Questions from the Audit Committee

Assurance









Will there be a need of ESG controller?

Will this report be subjected to assurance?

- The report is currently not subjected for assurance in the first year of reporting.
- Refer to the latest consultation issued by Securities Commission on assurance recommendation, which is currently planned to be on phased approach under ISSA5000

What are the sustainability assurance that we see in the market?

- Limited assurance mainly on ISAE3000, however, there are some on AA1000
- Examples of area of assurance: Scope 1, 2 and 3 GHG emissions, lost time incident rate, number of workrelated fatalities, total volume of water used, total waste generated

How do we start the assurance process?

- We recommend a phased approach to ensure readiness of reasonable assurance
- Organisations can consider the following approach: starting from review ▶ limited assurance ▶ reasonable assurance.

What does it take to obtain a reasonable assurance on GHG Emissions?

Like financial audit, there need to be maturity in the data reporting and governance process which could include:

- formal SOPs
- robust data collection and reporting systems/templates
- reporting methodology and manual



Implementation Challenges and Next Steps

These gaps in sustainability report would need to be address as part of reporting under the IFRS Sustainability Disclosure Standards







People

- Lack of understanding of impact of sustainability to organisation's risks and strategy
- Lack of buy-in on the importance of sustainability data reporting
- Lack of clarity on roles and responsibilities in preparing sustainability reports
- Inconsistent data entry by different data owners

Process

- Absence of Standard Operating Procedures (SOPs) for data collection
- Lack of clear communication regarding timelines and expectations
- Significant assumptions and estimates were not previously documented
- Data is only compiled annually, often lacking periodic audits and reviews
- Discovery of errors from previous years after reporting

Technology

- Data are not readily available to be examined
- Manual spreadsheets are heavily used, which are prone to human errors
- Absence of a centralised 'source of truth' for ESG data
- Data governance structure has not been set up

Critical factors for successful adoption









Commitment from the Board of Directors

- Align sustainability strategy with business strategy
- Identify and manage sustainabilityrelated risks upfront
- Allocate resources (financial, human, technological) effectively
- Focus sustainability reporting on value creation, not just compliance

Sustainability embedded within organisational processes and controls

- Establish a strong governance structure
- Develop integrated systems for accurate and timely data collection, analysis, and reporting
- Continuously monitor, evaluate, and improve sustainability practices

Collaboration across the organisation

- Collaboration between the CSO and CFO - balance sustainability goals and financial performance
- Connected and consistent information between sustainability and financial reports
- Internal audit reviewing the accuracy, integrity, and completeness of sustainability information

Effective change management plan, including personnel upskilling

- Phased adoption approach, with a robust change management
- Establish continuous feedback mechanisms
- Ensure affected personnel have necessary skills and project experience

PwC Information 28

PwC's publications and resources that you could refer to



Accounting podcasts on sustainability

PwC specialists discuss today's most compelling sustainability issues in accounting and external reporting.



ESG Academy

Offers a range of professional development programmes, and <u>e-learn modules</u> for sustainability upskilling.



Spotlight on sustainability: National Sustainability Reporting Framework

Covers the sustainability reporting requirements and sustainability assurance recommendations for Malaysia





Spotlight on sustainability: Gaps in sustainability reporting

Covers the common pitfalls in sustainability reporting processes in Malaysia.





Sustainability Reporting Guide

Serves as a compendium of reporting requirements under the following sustainability frameworks: ESRS, IFRS Sustainability Disclosure Standards and US SEC's climate disclosure rules.



Preparing for adoption of IFRS Sustainability Disclosure Standards

PwC's Sustainability & Climate Change Services help companies prepare and report its sustainability-related financial disclosures.



- Gap analysis Gap analysis on IFRS Sustainability Disclosure Standards
- Reporting readiness and effectiveness assessment - Analysis on the current reporting process, structure and governance
- Materiality assessment Identifying material sustainability matters
- Sustainability reporting implementation roadmap - Outlining reporting implementation roadmap (short-term, medium-term and longterm plans)



- Data collection Data collection and template
- Data management Data management and governance; including dashboarding and readiness assessments
- GHG accounting baselining Accounting for Scope 1 - Scope 3 GHG Emissions
- Climate scenario analysis Qualitative and quantitative assessment of your climate risks and opportunities
- Process documentation Documentation of your standard operating procedures (SOPs) and Reporting Manual
- ESG reporting tools Implementation of reporting tools/systems
- Sustainability upskilling Customised training programmes, including e-learns



- Sustainability report Storyboarding your Sustainability Report
- Reporting readiness assessment -Specified procedures and review of your data
- Assurance Assurance on your sustainability data

Contact us



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Thank you

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