

STAKEHOLDER AND MATERIALITY

MATERIALITY IS THE FIRST STEP OF THE SUSTAINABILITY APPROACH. THIS HELPS THE GROUP PRIORITISE ISSUES THAT SIGNIFICANTLY AFFECT BOTH OUR OWN OPERATIONS AND OUR STAKEHOLDERS. AS SUCH, WE VIEW STAKEHOLDER ENGAGEMENT AS INTEGRAL TO IDENTIFYING AND PRIORITISING THE MOST RELEVANT ESG TOPICS.

STAKEHOLDER ENGAGEMENT

The Group’s stakeholders are individuals and groups who both influence and are influenced by our activities. These include internal parties such as employees, as well as external stakeholders such as customers, regulators, and investors. Acknowledging this diverse stakeholder base, Matrix has maintained regular and structured communication throughout FY2026 to ensure our operations remain aligned with the interests and expectations of our key stakeholders.

Our consistent engagement platforms serve as channels for information sharing, feedback gathering, and constructive dialogue. They also foster open two-

way communication, allowing Matrix to actively seek diverse perspectives and feedback, rather than relying solely on internal assumptions. Equally important, by engaging relevant stakeholders, the Group stays attuned to evolving industry trends. This allows us to anticipate shifts in market demand and regulatory requirements.

Ultimately, this approach to stakeholder engagement also enables Matrix to reinforce our sustainability commitments. By embedding stakeholder perspectives into our sustainability strategy, the Group ensures that our operations not only deliver financial value but also prioritise the ESG issues that matter most to our stakeholders. This ensures that our sustainability priorities are not only aligned with global best practices but are grounded in the real concerns of our stakeholders.

Our stakeholder engagement activities throughout FY2026 can be summarised as follows:

STAKEHOLDER	KEY INTERESTS	OUR ENGAGEMENT APPROACH
 SUPPLY CHAIN PARTNERS Reliable suppliers and contractors are critical to ensuring the timely delivery of quality materials and services for the Group’s operations.	A unified objective, innovation and consistency; a reliable and secure workflow accompanied by favourable payment options and comprehensive terms and conditions.	We collaborate with our supply chain to tackle common challenges, enhance production capacity, address skill shortages, share knowledge, promote sustainable practices, and establish mutually beneficial terms.
 DEVELOPMENT PARTNERS & LANDOWNERS Strategic alliances with landowners and joint-venture partners expand Matrix’s development pipeline. These partnerships provide access to prime land and shared expertise.	The ability to operate within our planning framework while generating competitive land values, enhancing development quality, fostering a partnership culture, and ensuring reliability.	Our track record demonstrates exceptional reliability and expertise, successfully planning and delivering quality and value.
 CUSTOMERS & COMMUNITIES Customers are the end-users of Matrix’s developments, while communities form the social fabric around them. Their satisfaction and trust are central to brand reputation and long-term success.	Quality homes, essential physical and social infrastructure (e.g., schools, clubs, and hospitals), the distinctive character of the proposed development, and ongoing support through high standards of quality and service.	We actively engage with local residents and community representatives to resolve concerns and collaborate with our supply chain to reduce delays and minimise quality risks.

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STAKEHOLDER	KEY INTERESTS	OUR ENGAGEMENT APPROACH
 INVESTORS Investors provide the capital and confidence needed for Matrix's growth. Transparent communication and strong returns are essential to maintaining market credibility.	A transparent and consistent business strategy, robust governance, ethical practices, and a focus on long-term business value.	Our foremost obligation is to our investors, which we fulfill through regular communication and a clear plan for managed growth. A strong governance framework enables us to operate responsibly.
 EMPLOYEES Employees drive innovation, operational excellence, and customer service. Their skills and engagement are vital to Matrix's competitiveness.	Opportunities for career advancement, access to training and mentoring, and favourable working conditions.	We are committed to investing in progressive employment policies that ensure equal opportunities and offer career development programmes for all levels.
 GOVERNMENT & INDUSTRY Regulatory bodies and industry associations shape the operating environment. Compliance and collaboration ensure Matrix's licence to operate and reputation as a responsible developer.	Enhancing the rate of new home deliveries, improving the quality and sustainability of developments, and enforcing resource efficiency standards.	We are recognised for our high-quality developments and maintain an ongoing dialogue with relevant government agencies regarding emerging sustainable policies and regulations.

In addition to the stakeholder groups highlighted, the Group also engages with a broader range of stakeholders. These include Board members, non-governmental organisations ("NGOs"), media representatives, and any other group that may not fall into predefined categories. Such ad hoc engagements are conducted when specific needs arise, ensuring Matrix remains inclusive and aligned with the needs of all our stakeholders.

Membership in Associations

Apart from direct engagements with stakeholders, Matrix also contributes to the wider industry through active participation in industry associations and professional bodies. These memberships provide us with a valuable platform for dialogue, knowledge sharing, and collaboration with peers. Ultimately, this is another avenue for the Group to stay aligned with evolving industry standards and best practices, while providing a platform to contribute to the development of policies and initiatives that advance sustainable development.

The Group places strong emphasis on ensuring that our climate change and human rights commitments align with the positions of the trade associations in which we participate. We actively monitor the policies and advocacy positions of these associations to safeguard consistency with our own standards.

In situations where an association's stance on environmental or social issues is weaker than, or in direct conflict with, Matrix's commitments, the Group adopts a structured response. This may involve initiating dialogue with association leadership, submitting proposals for policy improvement, joining committees or working groups to influence outcomes, or, if alignment cannot be achieved, reconsidering our membership or level of support.

In FY2026, Matrix maintained memberships in the following associations:

1

CONSTRUCTION INDUSTRY DEVELOPMENT BOARD (“CIDB”)

CIDB regulates and develops the Malaysian construction sector through standards, training, and certification. Matrix’s construction arm holds the requisite CIDB registrations, ensuring compliance with its contractor grading and safety-training requirements.

MASTER BUILDERS ASSOCIATION MALAYSIA (“MBAM”)

MBAM represents contractors’ interests and promotes best practices in safety, quality, and ethics. As a corporate member of MBAM, Matrix regularly participates in their technical seminars and knowledge-sharing sessions on sustainable construction methods.

2

3

REAL ESTATE & HOUSING DEVELOPERS’ ASSOCIATION (“REHDA”)

Matrix is a member of REHDA, the nationwide body advocating responsible property development and policy reform in the housing sector. Matrix is an early supporter of REHDA’s green building initiative, having collaborated with GreenRE to create awareness on the built environment’s impact on climate change since 2019.

UNITED NATIONS GLOBAL COMPACT (“UNGC”)

The UNGC promotes corporate sustainability under ten universally accepted principles covering human rights, labour, environment, and anti-corruption. Matrix has endorsed the UNGC Principles and reports annually on its progress.

4

5

MALAYSIAN EMPLOYERS FEDERATION (“MEF”)

Matrix is a member of MEF, which fosters employer-employee dialogue and advances sound labour practices in Malaysia, including on matters of human rights, fair wages, and workplace wellbeing.

MALAYSIAN SOCIETY FOR QUALITY IN HEALTH (“MSQH”)

ASSOCIATION OF PRIVATE HOSPITALS OF MALAYSIA (“APHM”)

MSQH is the accreditation body for healthcare-facility quality and patient safety, while APHM represents private healthcare providers, promoting quality standards and policy advocacy.

Through its membership in MSQH and APHM, Matrix works with accredited hospitals to exchange best practices in hospital infrastructure planning, facility design, and operational safety while helping to integrate green building practices into healthcare operations.

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NEGERI SEMBILAN INDUSTRIAL LIAISON COUNCIL

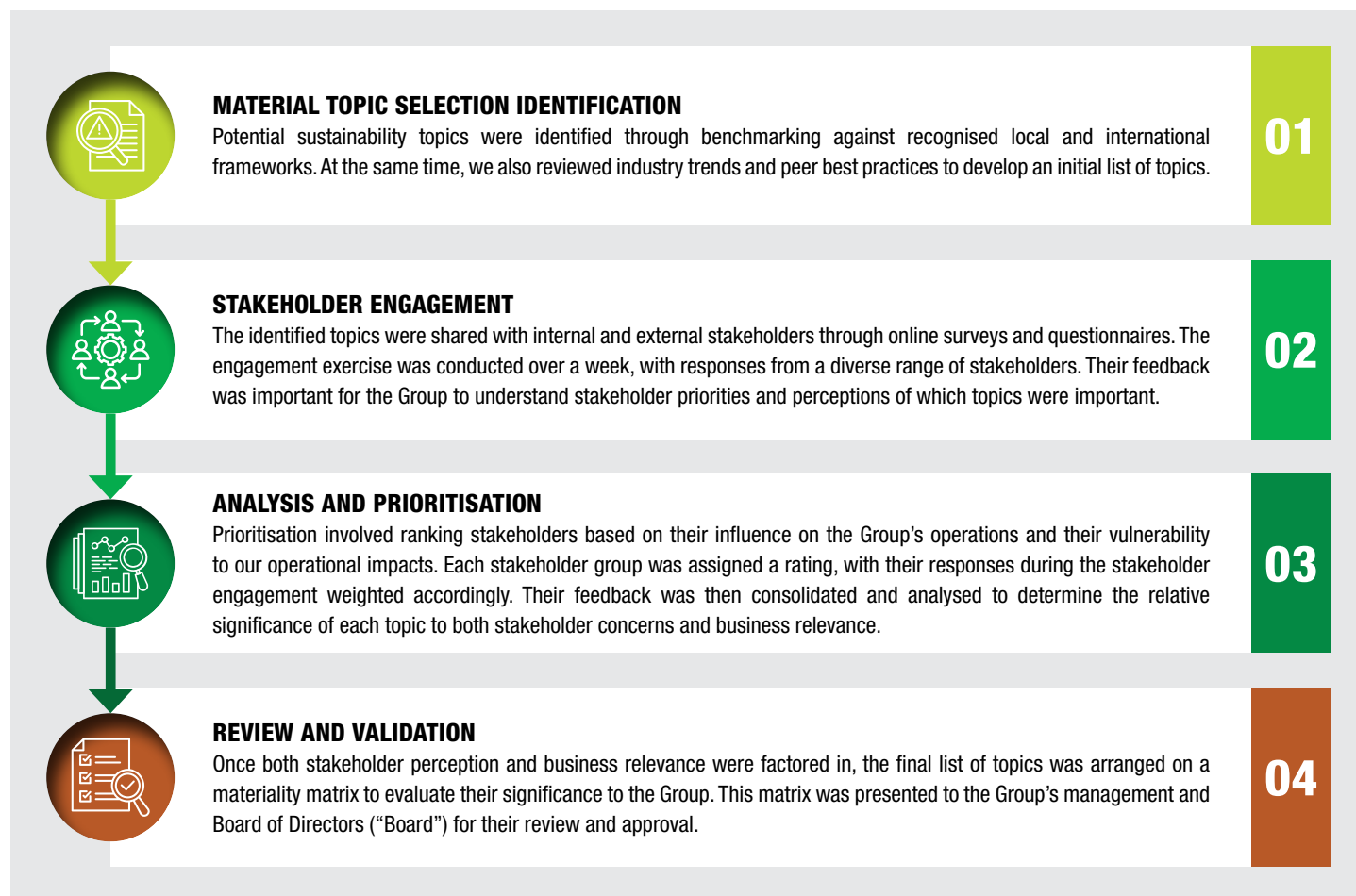
Matrix sits on the Negeri Sembilan Industrial Liaison Council, which fosters cooperation between industry and the local state government. Through the Council, Matrix works to support regional economic development, engaging with both the state government and industry players on local infrastructure planning and skills-development initiatives.

MATERIALITY ASSESSMENT

As part of the Group's ongoing commitment to aligning our business practices with stakeholder expectations, Matrix conducted a refreshed materiality assessment exercise ("MAE") in FY2025. This MAE was designed to identify and prioritise material sustainability topics that are most relevant to both the Group and our stakeholders. In order to ensure that the selected material topics remain relevant to the operations of Matrix, this assessment process is conducted every two years.

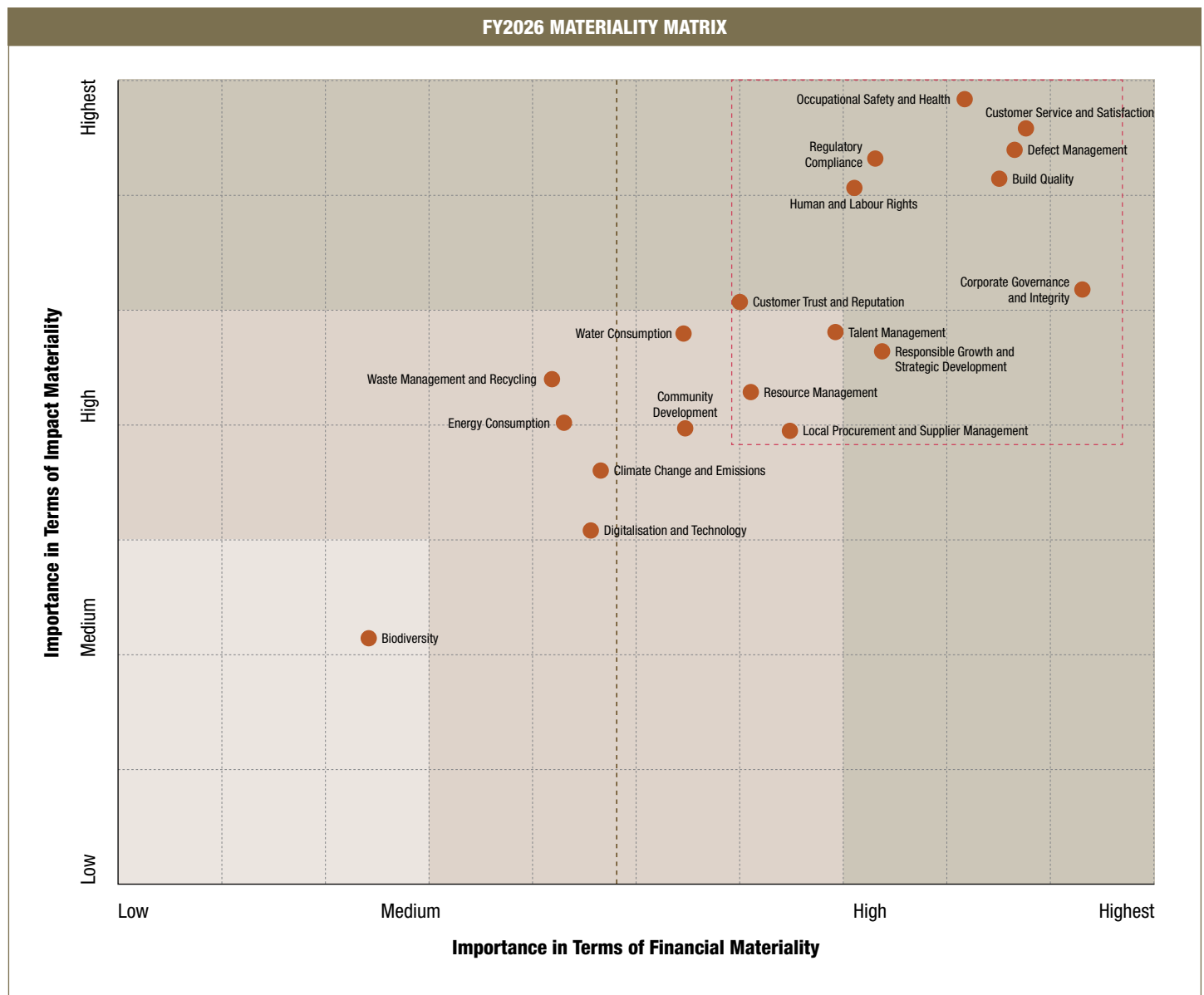
To ensure a double materiality approach, the MAE process considered both financial and impact materiality. Financial materiality was assessed by examining how sustainability topics influence the Group's financial performance, resilience, and ultimately enterprise value. Meanwhile, impact materiality was evaluated by looking into how our activities may affect communities, the environment, and broader societal outcomes. By integrating these two dimensions, Matrix ensures that our sustainability priorities are not only commercially significant but also socially and environmentally relevant, reinforcing long-term value creation for stakeholders.

The assessment process was structured around several key steps:



STAKEHOLDER AND MATERIALITY

Following the MAE process, the following materiality matrix has been developed:



Based on the MAE process, the following topics are deemed to be the most material to the operations of Matrix:

- | | |
|------------------------------------|---|
| 1 Corporate Governance & Integrity | 7 Talent Management |
| 2 Build Quality | 8 Defect Management |
| 3 Customer Service & Satisfaction | 9 Resource Management |
| 4 Occupational Safety & Health | 10 Local Procurement & Supplier Management |
| 5 Regulatory Compliance | 11 Responsible Growth & Strategic Development |
| 6 Human & Labour Rights | 12 Customer Trust & Reputation |

While climate change was not rated among the top material topics in the MAE process due to its relatively indirect impact on our operations, the BOD and Senior Management continue to regard it as financially significant. This is because of the potential operational risks carried by climate change, including regulatory changes, rising operational costs, and long-term resilience of our developments. As such, climate change remains a priority area for the Group.

Stakeholder Alignment

To ensure relevance, Matrix has also mapped all identified material topics against our key stakeholder groups. This further allows the Group to consider appropriate approaches to manage the various material topics, as follows:

LEGEND:

Stakeholders:



Board of Directors



Employees



Shareholders & Investors



Customers



Suppliers



Government/Regulators



Bankers & Financial Institutions



Local Community/General Public



NGO Representatives



Media

Material Relevance to Matrix:



Low



Moderate



High



Highest



LONG-TERM ECONOMIC CONTINUITY



M1 CUSTOMER SERVICE & SATISFACTION

Ensuring positive customer experiences, timely support, and strong after-sales service to build trust and loyalty.

Financial Materiality



High

Impact Materiality



Highest

Overall Materiality Rating



Highest

Material Relevance to Matrix:

- Drives brand appeal and sales performance
- Central to sustaining demand
- Builds long-term customer loyalty

Relevant Stakeholders:



Our Management Approach:

Property Development Division



- Designated customer-service team and structured procedures to handle enquiries, complaints, and defect rectification within set service-level timelines
- Post-handover customer satisfaction surveys and review of complaint trends

Hospitality Division



- Standard service procedures and customer-service guidelines for all staff
- Regular service training and refresher programmes
- Feedback and complaint-management mechanism with designated personnel to investigate and act
- Members'/ guests' feedback compiled in monthly management reports

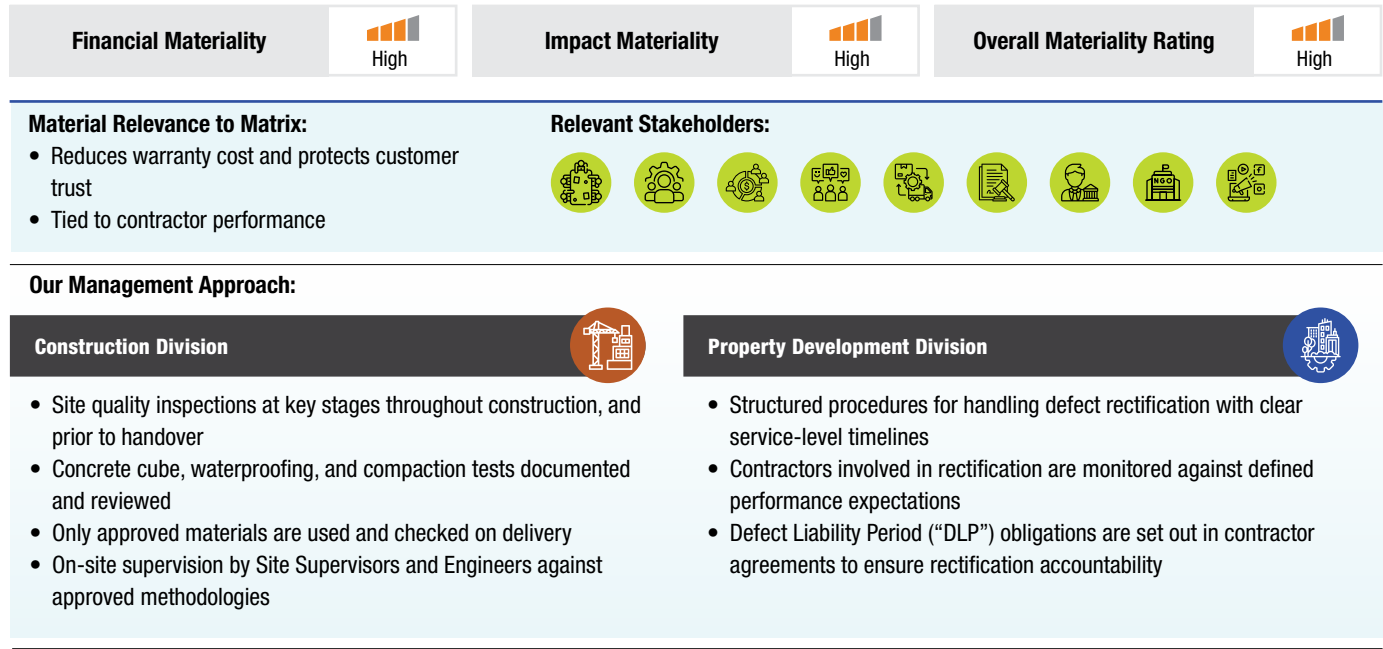
Healthcare Division



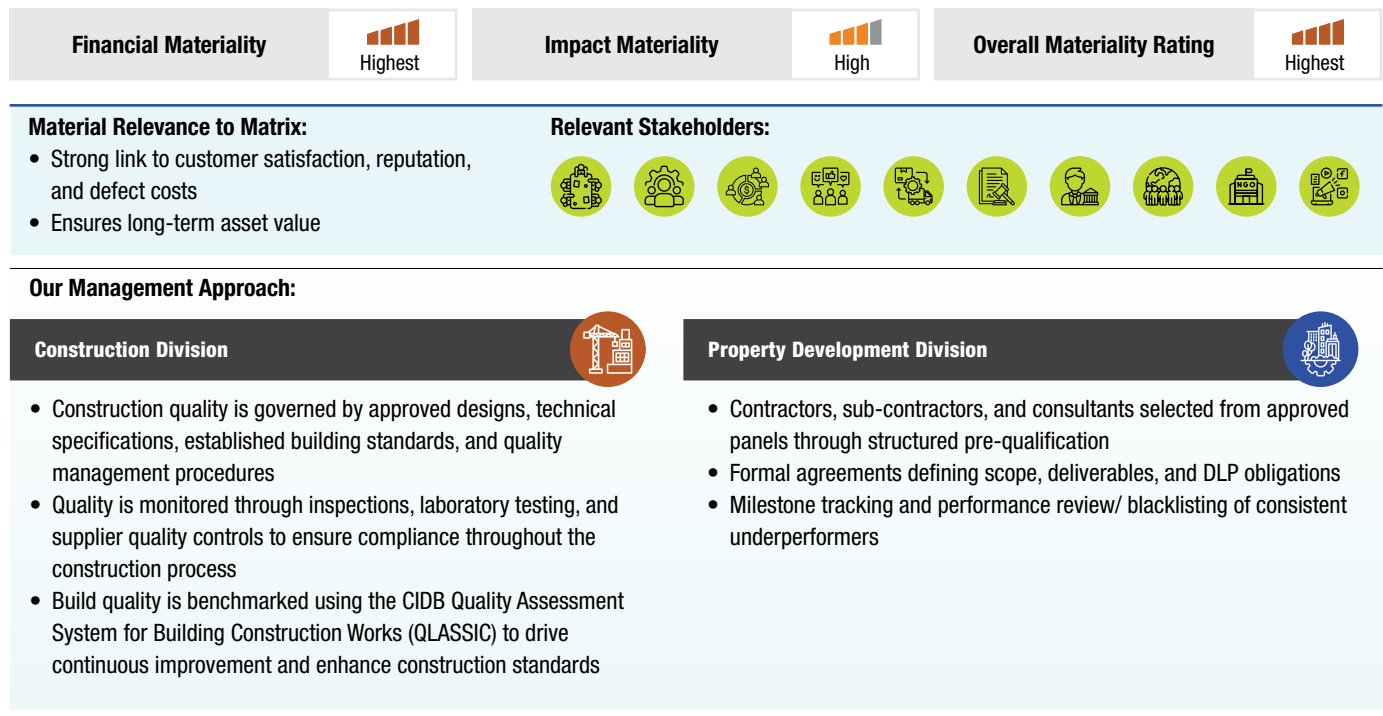
- Formal escalation channel for patient complaints and feedback with tracking and timely resolution
- Monthly trend analysis to identify recurring issues
- Service-recovery and communication training for frontliners and executives

M2 DEFECT MANAGEMENT

Addressing construction defects efficiently to maintain quality standards and safeguard reputation.

**M3 BUILD QUALITY**

Delivering durable, safe, and high-standard developments that meet regulatory and customer expectations.



M4 CUSTOMER TRUST & REPUTATION

Strengthening Matrix's market presence and reputation through consistent quality, innovation, and customer trust.

Financial Materiality	High	Impact Materiality	High	Overall Materiality Rating	High
Material Relevance to Matrix: - Influences sales and investor confidence - Tied to delivery track record					
Relevant Stakeholders: 					
Our Management Approach:					
Group 		Property Development/ Hospitality/ Healthcare Divisions 			
- Data Protection Policy and Data Breach Response Plan in compliance with the Personal Data Protection Act ("PDPA") - Appointed Data Protection Officer ("DPO") - Role-based access controls ("RBAC") - Periodic staff training on data protection - Anti-Bribery and Anti-Corruption ("ABAC") Policy, Code of Conduct, and confidential whistleblowing channels to uphold integrity and preserve public trust		Customer service standards, complaint-handling, and feedback mechanisms that protect confidence and brand image			

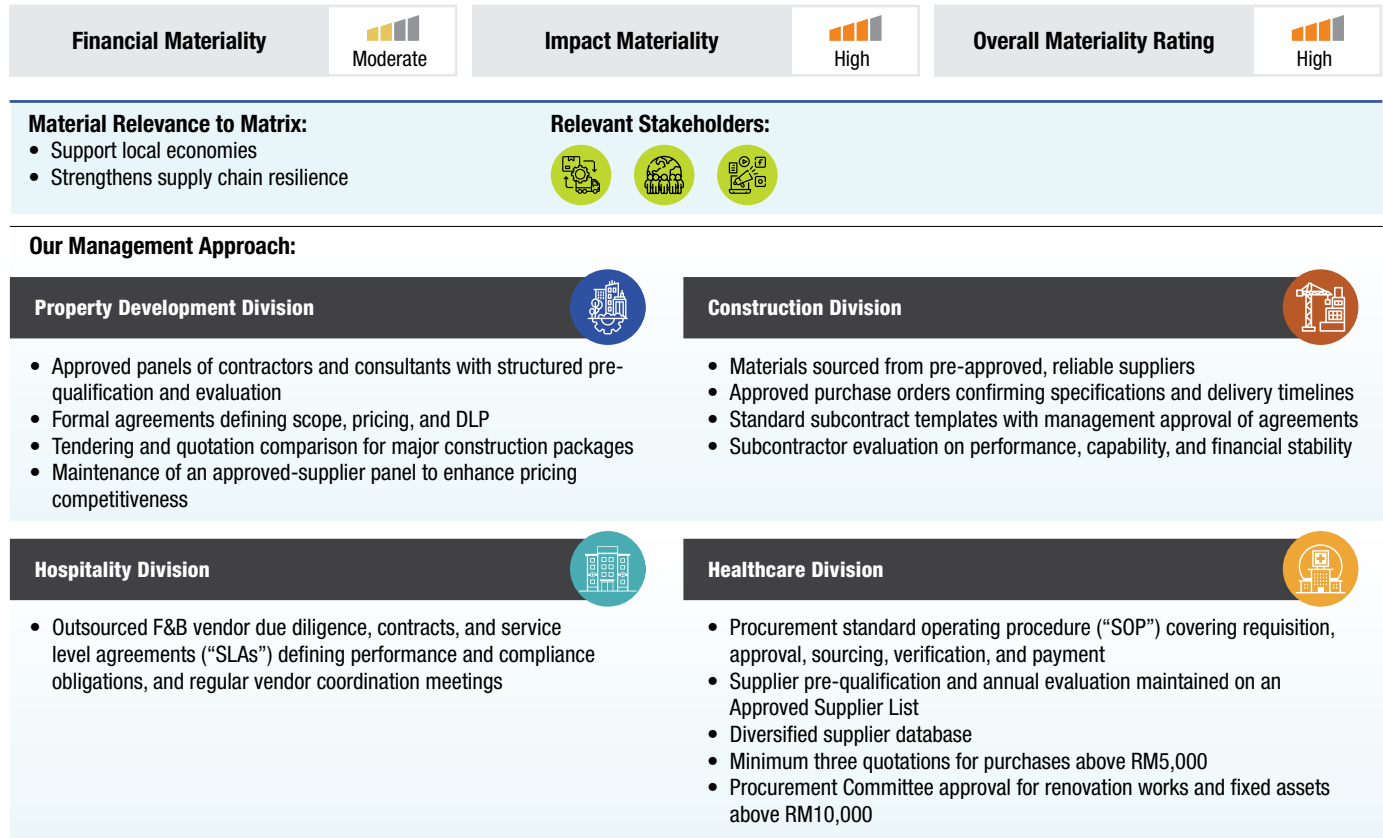
M5 RESPONSIBLE GROWTH & STRATEGIC DEVELOPMENT

Securing and managing strategic land assets to support long-term growth, financial resilience, and the development pipeline.

Financial Materiality	High	Impact Materiality	Moderate	Overall Materiality Rating	High
Material Relevance to Matrix: - Landbanking critical for enterprise value - Strategic land assets can drive growth through expansion					
Relevant Stakeholders: 					
Our Management Approach:					
Property Development Division 		Hospitality/ Healthcare/ Construction/ Education Divisions 			
- Development decisions are guided by due diligence, market assessments, financial viability, risk evaluation, and Board approval to support responsible growth - Master planning integrates township liveability, infrastructure readiness, environmental considerations, and stakeholder needs - Project performance, market demand, pricing, and customer insights are regularly reviewed to optimise development strategies and long-term value creation - Diversified sales channels, strategic partnerships, and proactive asset management strengthen business resilience and sustainable returns		- Growth opportunities are evaluated through due diligence, financial viability, sustainability and enterprise risk assessments, with Management and Board approval - Business expansion is aligned with the Group's strategy, operational capacity, and stakeholder needs to support responsible long-term growth - Business performance, operational risks, customer feedback, and key performance indicators are regularly monitored to drive continuous improvement - Operations are supported by recognised industry standards, regulatory compliance, quality management systems, and internal controls to strengthen resilience and long-term value creation			

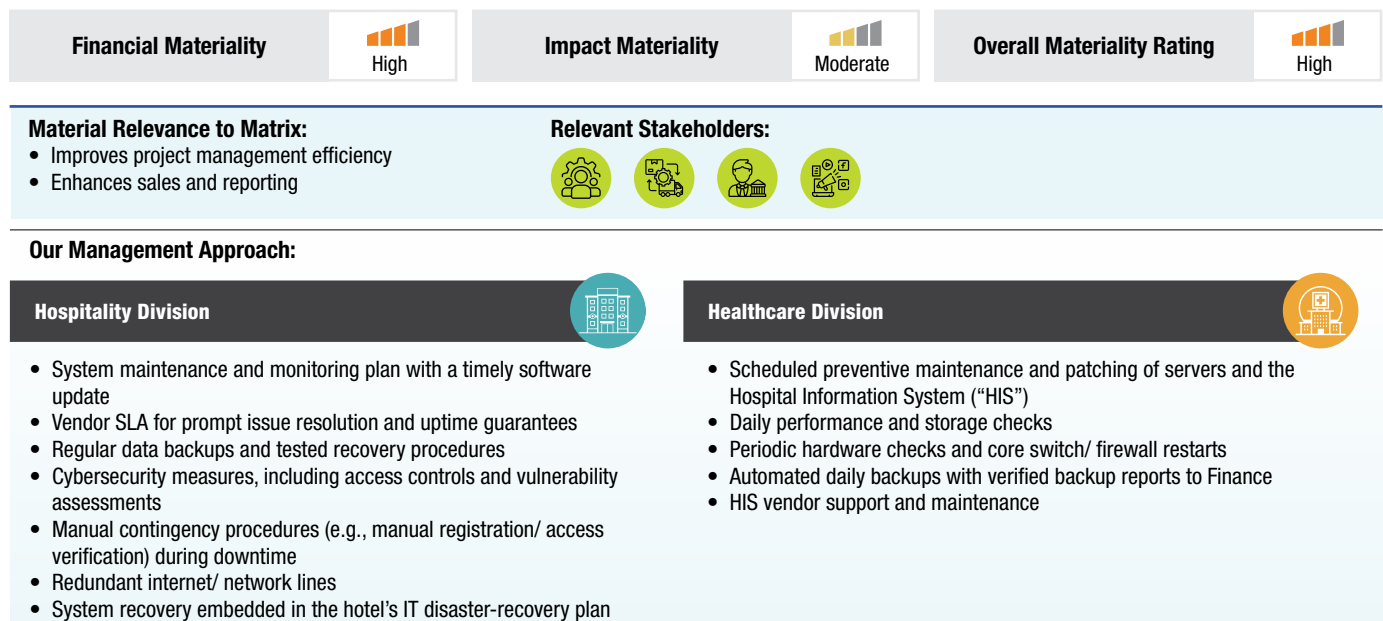
M6 LOCAL PROCUREMENT & SUPPLIER MANAGEMENT

Partnering with local suppliers to ensure reliable, cost-effective, and sustainable sourcing.



M7 DIGITALISATION & TECHNOLOGY

Leveraging digital tools and innovation to improve efficiency, customer engagement, and operational excellence.



ENVIRONMENTALLY CONSCIOUS APPROACH



M8 RESOURCE MANAGEMENT

Efficient use of raw materials to minimise waste and optimise construction processes.

Financial Materiality	 High	Impact Materiality	 High	Overall Materiality Rating	 High
Material Relevance to Matrix: Efficient raw material use lowers operational costs and reduces environmental footprint					
Relevant Stakeholders: 					
Our Management Approach:					
Construction Division  - Material requirements estimated by the Quantity Surveyor with batch deliveries tracked against site progress to reduce wastage - Waste segregation with proper storage and disposal - Use of efficient construction system technologies such as aluminium formworks system to embed resource efficiency into home design, improving speed and consistency of construction while reducing material wastage - Continuous, stringent quality checks to lower rework and resource loss					

M9 WATER CONSUMPTION

Monitoring and reducing water usage across developments and operations.

Financial Materiality	 Moderate	Impact Materiality	 High	Overall Materiality Rating	 High
Material Relevance to Matrix: - Water is critical during construction and the operations of our amenities - Efficient use lowers operational costs and supports environmental stewardship		Relevant Stakeholders: 			
Our Management Approach:					
Group  - Rainwater-harvesting systems integrated at township and amenity level (including tanks for non-potable and gardening use) to provide a reserve during dry spells - Leveraging more water-efficient building designs - Collaboration with local authorities and state utility providers throughout the project lifecycle to secure water resources - Employee training on water-conservation techniques		Property Development/ Construction Divisions  - Compliance with the Urban Stormwater Management Manual for Malaysia (“MSMA”) for the provision of larger drainage and irrigation channels and water-retention ponds - Provision of water bodies (lakes and ponds) where land is in water-stressed areas - Groundwater extraction as a construction contingency			

M10 CLIMATE CHANGE & EMISSIONS

Managing carbon footprint and adopting strategies to mitigate climate-related risks.

Financial Materiality	Highest	Impact Materiality	Highest	Overall Materiality Rating	Highest
Material Relevance to Matrix: - Our operational activities release emissions that contribute to climate change - Compliance with carbon regulations affects costs - Climate resilience is critical for overall sustainability					
Relevant Stakeholders:       					
Our Management Approach:					
Group 		Property Development/ Construction Divisions  			
- Close monitoring of government announcements and updates on resources, environmental conservation, climate change, and sustainability to guide the necessary actions and procedures - Climate Risk Assessment ("CRA") conducted in FY2025 aligned to the NSRF and IFRS S1/ S2 - Adoption of TCFD and SASB frameworks		- Contractors' All Risk ("CAR") and Workmen Compensation insurance - Emergency Response Plan - Suspension of outdoor works in unsafe or severe weather - Deployment of additional workforce/ extended hours to recover from weather-related delays			

M11 WASTE MANAGEMENT & RECYCLING

Implementing practices to reduce, reuse, and recycle construction and operational waste.

Financial Materiality	High	Impact Materiality	High	Overall Materiality Rating	High
Material Relevance to Matrix: - Our operations generate significant waste, which can lead to pollution if not properly managed - Efficient management reduces both operational and compliance costs					
Relevant Stakeholders:       					
Our Management Approach:					
Group 		Construction Division 			
- Waste management is guided by waste minimisation, resource efficiency, regulatory compliance, and responsible disposal across the Group - Waste reduction, recycling, and recovery are supported through waste segregation, licensed waste management practices, and stakeholder engagement - Waste performance is regularly monitored to improve resource efficiency, promote circular economy practices, and drive continuous improvement		- Segregation of general waste, construction debris, and hazardous waste, with the use of licensed waste collectors - Daily cleaning - Proper storage and disposal of construction waste - Periodic environmental checks recorded and tracked - Environmental Impact Assessment ("EIA")/ Environmental Monitoring Plan ("EMP") preparation and adherence to Department of Environment ("DOE") conditions			

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M12 ENERGY CONSUMPTION

Enhancing energy efficiency and exploring renewable energy solutions.

Financial Materiality	High	Impact Materiality	High	Overall Materiality Rating	High
Material Relevance to Matrix: Energy use impacts operational costs and is directly tied to carbon footprint					
Relevant Stakeholders: 					
Our Management Approach:					
Group 		Hospitality/ Healthcare/ Education Divisions 			
- Energy management is guided by resource efficiency, regulatory compliance, and responsible energy use across the Group - Energy consumption is regularly monitored to improve operational efficiency through preventive maintenance, operational optimisation, and energy-efficient technologies where appropriate - Employee awareness and operational best practices promote energy conservation, while energy performance is periodically reviewed to improve resource efficiency, reduce greenhouse gas emissions, and support continuous improvement		- Genset/ backup generators to supply electricity to essential operations during power outages - Solar-panel installation to reduce reliance on conventional energy sources and lower carbon emissions			

M13 BIODIVERSITY

Protecting ecosystems and integrating green spaces into developments to support environmental balance.

Financial Materiality	Moderate	Impact Materiality	Highest	Overall Materiality Rating	High
Material Relevance to Matrix: - Township developments affect ecosystems - Protecting biodiversity supports compliance and maintains crucial ecosystem services					
Relevant Stakeholders: 					
Our Management Approach:					
Group 					
- Biodiversity assessment conducted at the Bandar Seri Sendayan township to identify biodiversity risks and opportunities - Landbank screened for high-conservation-value ("HCV") and environmentally sensitive areas, with development plans, construction methods or land-use altered (and EIA/ social-impact assessments conducted) to retain HCV and preserve IUCN Red List species - Nature protection and restoration initiatives such as Miyawaki Forest programme for reforesting HCV species, creating a nursery and seed bank for future conservation					



PEOPLE-FIRST PHILOSOPHY



M14 OCCUPATIONAL SAFETY & HEALTH

Safeguarding employee and contractor well-being through strict safety standards and practices.

Financial Materiality



High

Impact Materiality



Highest

Overall Materiality Rating



Highest

Material Relevance to Matrix:

- Strong safety practices reduce safety risks and potential downtime
- Reinforces the Group's culture of care and compliance

Relevant Stakeholders:



Our Management Approach:

Group



- Governance under relevant frameworks and regulations, Hazard Identification, Risk Assessment, and Risk Control ("HIRARC"), and the CIDB SHASSIC assessment
- Group Health & Safety Policy covering employees and site workers
- Established Occupational Safety & Health Committee
- OSH committees at all premises with worker representation
- Board review of Unsafe Acts and Conditions ("UAUCs"), Lost Time Injuries ("LTIs"), and injury rates

Construction Division



- Site Safety & Health Policy displayed at sites
- Monthly Safety & Health Committee meetings
- Appointed Safety & Health Officer and Site Safety Supervisor
- Weekly toolbox meetings
- Mandatory personal protective equipment ("PPE")
- Safety signage and barricades
- Permit-to-work for high-risk activities
- Emergency Response Plan
- Accident/ incident reporting and investigation

Hospitality/ Education Divisions



- Established Safety & Health Policy
- Compliance with occupational safety and health laws
- Safety inspections and audits
- Ongoing safety, first-aid, and emergency-response training
- Incident investigation with corrective and preventive action
- Safety signage
- Access control and visitor registration

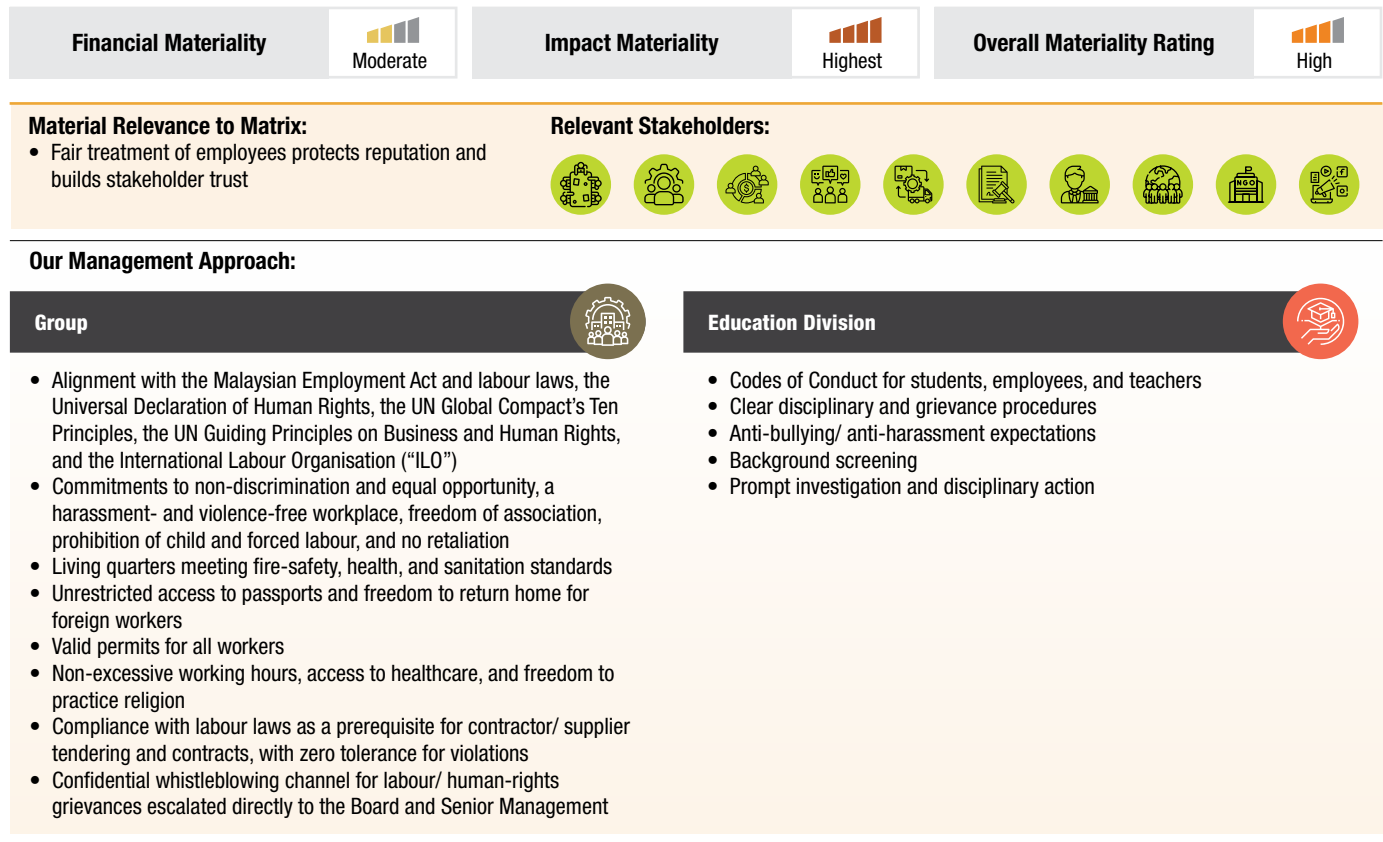
Healthcare Division



- Infection prevention and control protocols and outbreak response aligned with the Ministry of Health ("MOH")
- Medical malpractice safeguards (SOPs, consent documentation, and professional indemnity insurance)

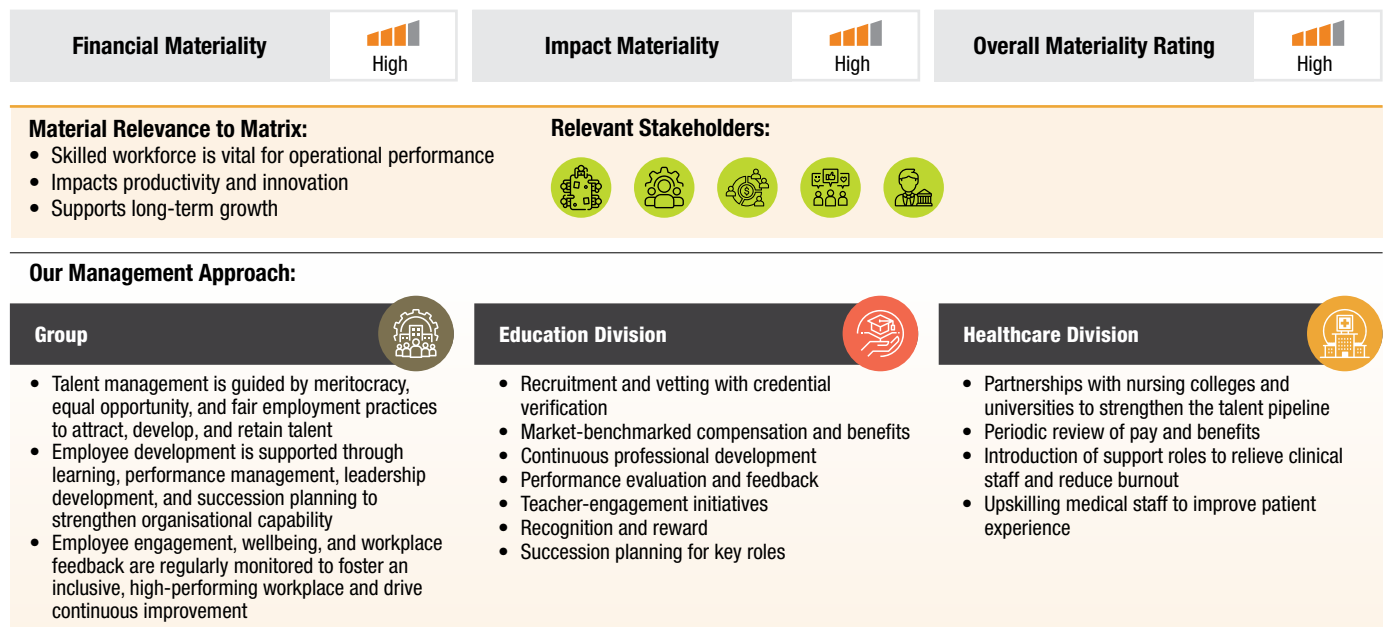
M15 HUMAN & LABOUR RIGHTS

Upholding fair treatment, non-discrimination, and ethical labour practices across operations and supply chains.



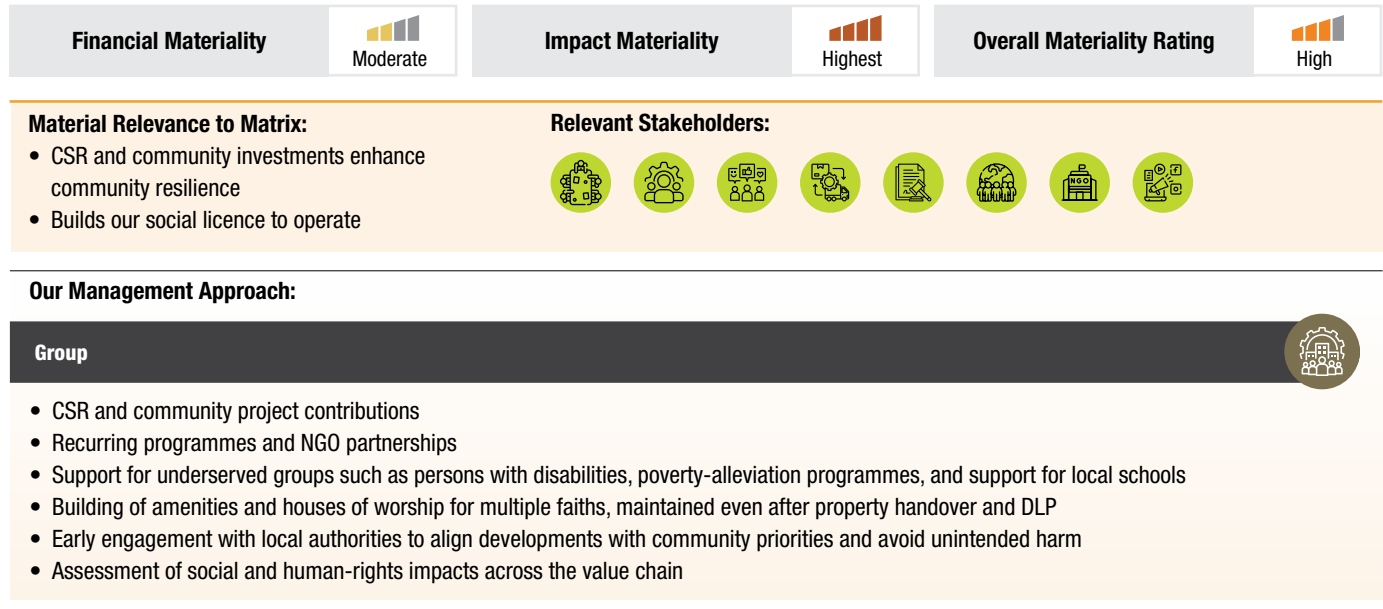
M16 TALENT MANAGEMENT

Developing and retaining skilled employees through training, career growth, and engagement initiatives.



M17 COMMUNITY DEVELOPMENT

Supporting local communities through infrastructure, amenities, and social programmes that enhance the quality of life.

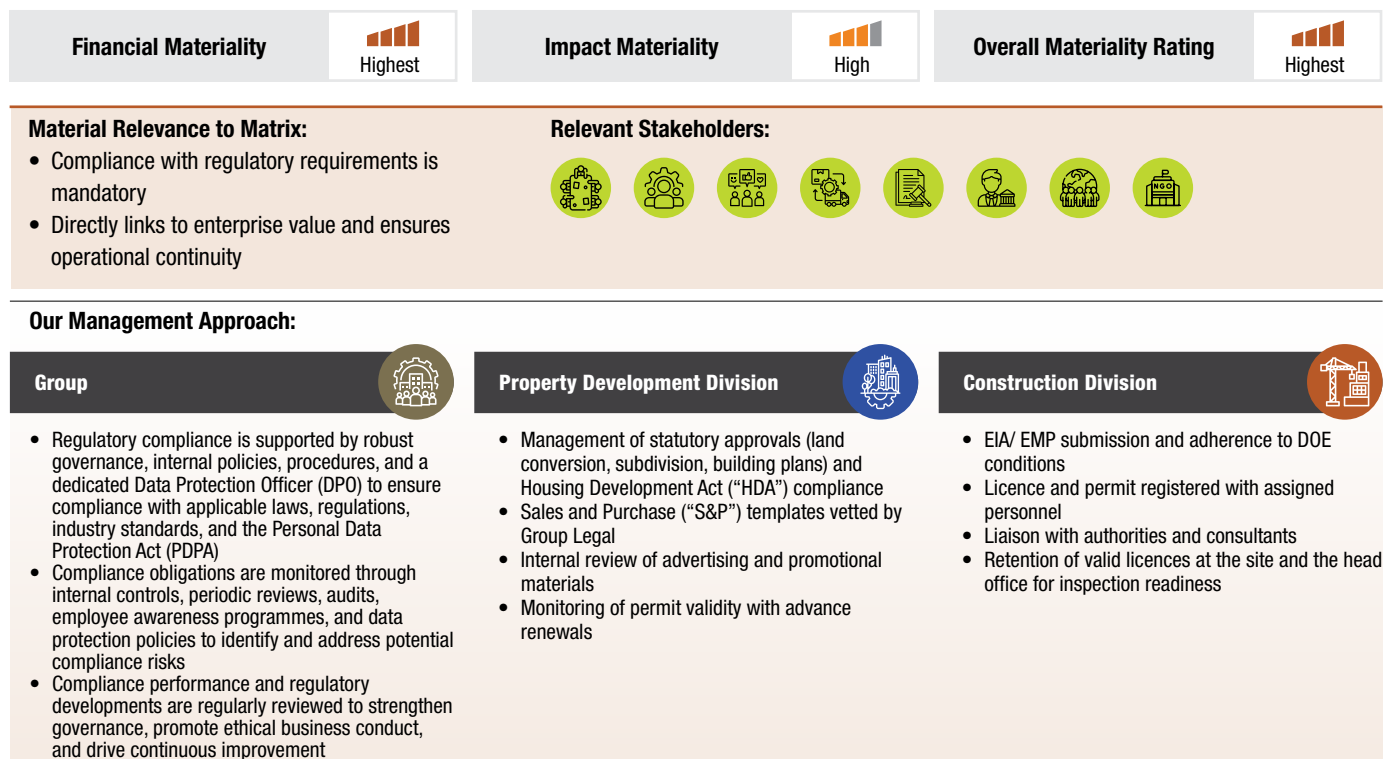


RESILIENT AND TRUSTWORTHY BUSINESS



M18 REGULATORY COMPLIANCE

Ensuring adherence to laws, regulations, and industry standards to maintain our licence to operate.



M18 REGULATORY COMPLIANCE

Our Management Approach:

Hospitality/ Education Divisions



- Comprehensive licensing and permit registers with renewal dates and responsible personnel
- Periodic compliance reviews and internal audits
- Timely submission and renewal of permits
- Tracking new or changing requirements

Healthcare Division



- Licensing and Regulatory Affairs function monitors the relevant regulatory requirements
- SIRIM accreditation and ISO certification
- Timely licence renewals
- Compliance Officer and compliance training
- Adherence to MOH outbreak SOPs

M19 CORPORATE GOVERNANCE & INTEGRITY

Upholding transparency, accountability, and ethical business practices across all levels of the organisation.

Financial Materiality



Impact Materiality



Overall Materiality Rating



Material Relevance to Matrix:

- Ensures investor confidence
- Transparent reporting supports enterprise value

Relevant Stakeholders:



Our Management Approach:

Group



- ABAC Policy and Code of Conduct
- Vendor and contractor due diligence
- Segregation of duties across procurement, approval, and payment
- Whistleblowing channel for confidential reporting of misconduct
- Regular staff training and awareness on ethical conduct and compliance

Education Division



- Governance oversight through monthly management meetings, half-yearly Board meetings, and periodic internal audits

Healthcare Division



- Pricing-governance controls
- Procurement governance via an Approved Supplier List, a Procurement Committee, and quotation/ approval thresholds