



INNOVATION FOR FUTURE GROWTH

SUSTAINABILITY REPORT 2024

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NAVIGATE OUR REPORT

In the report, we utilise the following icons to signify the connectivity between our business elements.

CAPITALS



STRATEGIC FOCUS AREAS



STAKEHOLDERS



MATERIAL MATTERS



RISKS



ABOUT THIS REPORT

We are proud to present the Sustainability Report for CTOS Digital Berhad (“CTOS Digital” or “the Company”) and its subsidiaries (“CTOS” or “the Group”) for the financial year ending 31 December 2024.

This report offers a comprehensive view of our efforts to deliver long-term positive impacts across our business units, operations, and the communities we serve. It reflects our journey so far, highlighting the initiatives undertaken, challenges faced and achievements in advancing our Sustainability Blueprint. Our focus remains aligned on fostering continuous improvement, championing a transition to a low-carbon economy, and safeguarding our planet and our people.

REPORTING PERIOD, SCOPE, FREQUENCY AND BOUNDARY

This Sustainability Report (SR) encompasses all entities within the CTOS Group, including subsidiaries as well as internal and external stakeholders. We streamline the scope of our SR to align with the scope of our integrated and financial reporting, ensuring a consistent and comprehensive approach.

The report details CTOS’ sustainability strategy, initiatives, and performance for the period from 1 January to 31 December 2024, unless stated otherwise, including data from the recently acquired operations in Thailand. We focus on our business operations in Malaysia under the Group’s principal subsidiaries, addressing critical issues identified through a thorough materiality assessment. Associates and international subsidiaries are not included in the scope of this report.

We have strived to present a detailed account of all material issues impacting the Group. This SR includes both qualitative and quantitative outcomes for the indicators discussed unless stated otherwise. For a holistic understanding, this report should be read together with our Integrated Annual Report (IAR) 2024.

Reporting Frameworks

This report was developed to the following standards, guidelines and best practices:

- International Integrated Reporting Council’s (IIRC) Integrated Reporting <IR> Framework
- Bursa Malaysia Main Market Listing Requirements (MMLR)
- Securities Commission Malaysia Malaysian Code on Corporate Governance (MCCG)
- Malaysian Financial Reporting Standards (MFRS)
- Bursa Malaysia’s Sustainability Reporting Guide
- FTSE4Good Bursa Malaysia (F4GBM) Index
- Global Reporting Initiative (GRI) Sustainability Reporting Standards
- United Nations Sustainable Development Goals (UN SDGs)
- Companies Act 2016

- Credit Reporting Agencies (CRA) Act 2010
- ISO 26000 Guidance on Social Responsibility
- ISO 27001 Information Security Risks
- ISO 31000 Risk Management Guidelines

ASSURANCE

This Report has been reviewed by CTOS’ Internal Audit and has been approved by CTOS’ Risk and Compliance Committee (RCC), to ensure the accuracy and integrity of our disclosures.



INTEGRATED ANNUAL
REPORT (IAR) 2024



SUSTAINABILITY
REPORT (SR) 2024

OVERVIEW OF CTOS**WHO WE ARE AND WHAT WE DO**

CTOS Digital Berhad is an important player in the ASEAN credit reporting landscape, enabling digital credit solutions through strategic investments and innovation.

Through innovative, forward-thinking strategies, we aim to empower people and businesses to adapt to an evolving economy. Our Group provides a wide range of digital tools and credit management solutions, designed to address each phase of the credit lifecycle. These solutions cater to key sectors across ASEAN, including banking, insurance, financial services, telecommunications, major corporations as well as Small and Medium Enterprises (SMEs). By promoting inclusivity and strengthening resilience, we aim to establish a sustainable and robust financial ecosystem throughout the region.

**OUR CORE BUSINESS SEGMENTS****OUR PRESENCE**

We have built a strong operational foundation in Malaysia. Over the years, we have strategically expanded our presence to other key ASEAN markets, namely Thailand, Indonesia and the Philippines.

OVERVIEW OF CTOS WHO WE ARE AND WHAT WE DO



KEY ACCOUNTS - MALAYSIA

- **Customers served:** Approximately 500 high revenue generating customers
- **Top contributors:** Banks, NBFIs and telcos
- **Services provided:** Digital reports, Comprehensive Portfolio Review & Analytics Digital Solutions CTOS Application and Decisioning (CAD), electronic Know-Your-Customer (eKYC), ID Guard, electronic Trade Reference (eTR)



COMMERCIAL

- **Customers served:** >22,000 customers
- **Top 5 industries:** Wholesale and retail trade, manufacturing, professional services, construction, finance and insurance
- **Services provided:** Credit Manager, Credit Monitoring and eTR



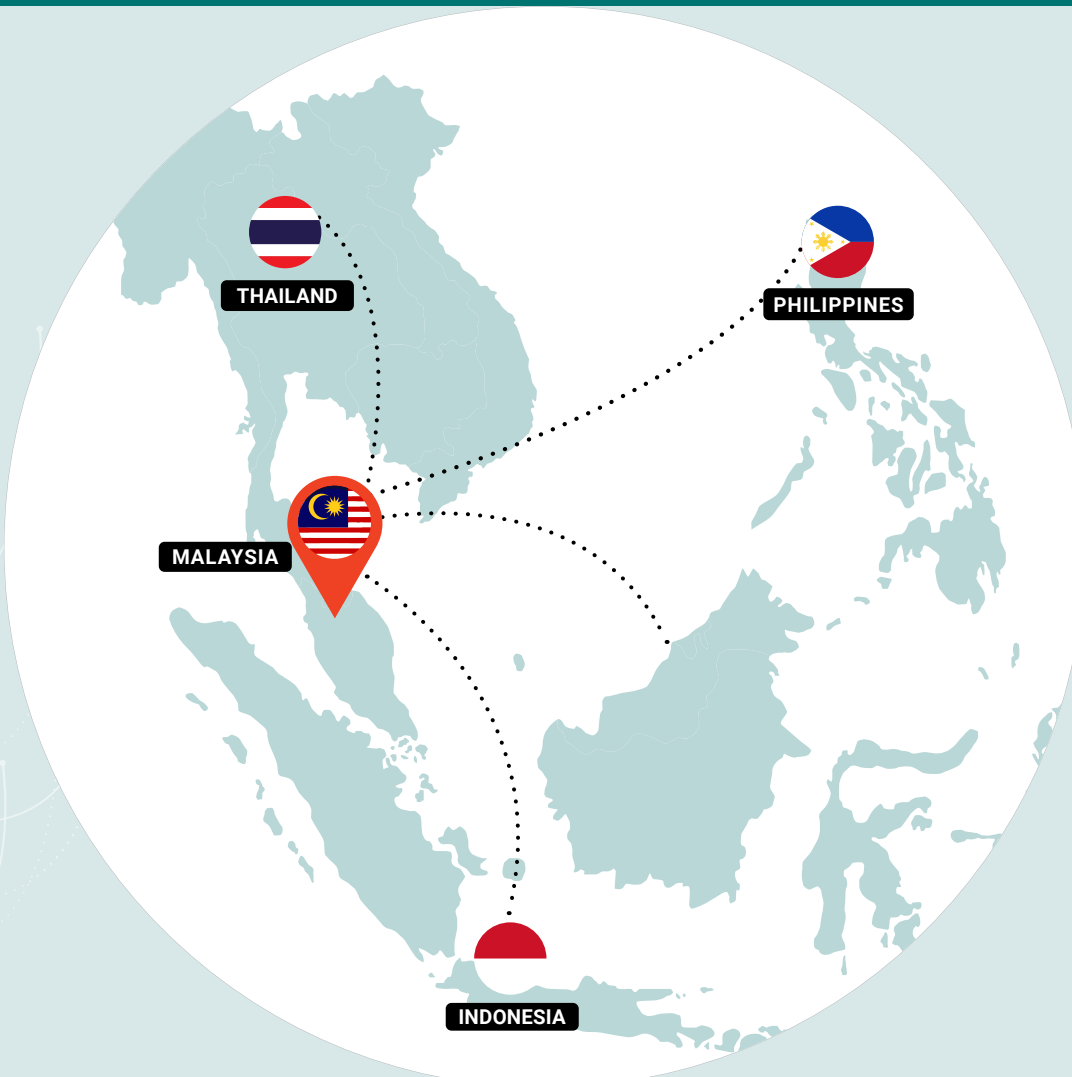
KEY ACCOUNTS - INTERNATIONAL

- **Customers served:** Approximately 80 clients across the Philippines and Indonesia
- **Coverage:** Close to 100% telco coverage in Indonesia and the Philippines
- **Services provided:** Alternative score platform



DIRECT-TO-CONSUMER (D2C)

- **Customers served:** >4.4 million registered users for CTOS ID
- **Services provided:** CTOS Score, CTOS SecureID, Credit Finder, CTOS Credit Monitoring and CTOS Vehicle Check



OVERVIEW OF CTOS

OUR VISION, MISSION AND PURPOSE

We are committed to transforming Malaysia into the leading credit reporting hub in ASEAN. Our focus is on delivering sustainable and valuable solutions that benefit our customers and contribute positively to the communities we serve.

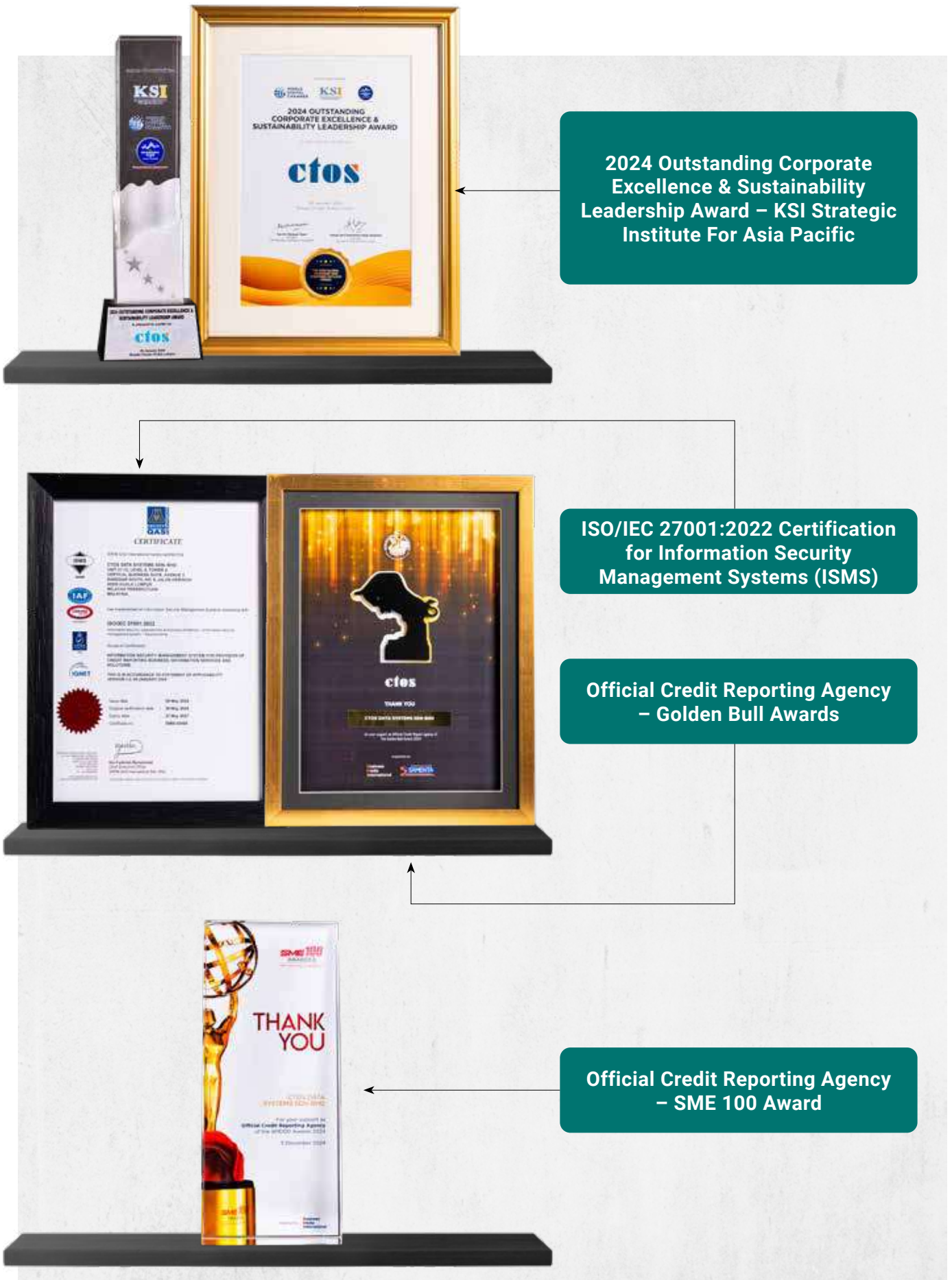


Integrating sustainability into CTOS' core values and strategy positions us to seize new opportunities in the digital economy while fostering a responsible and sustainable business ecosystem.



OVERVIEW OF CTOS

AWARDS AND RECOGNITIONS



2024 Outstanding Corporate Excellence & Sustainability Leadership Award – KSI Strategic Institute For Asia Pacific

ISO/IEC 27001:2022 Certification for Information Security Management Systems (ISMS)

Official Credit Reporting Agency – Golden Bull Awards

Official Credit Reporting Agency – SME 100 Award

SUSTAINABILITY LEADERSHIP**A MESSAGE FROM
OUR CHAIRMAN AND GCEO****DEAR STAKEHOLDERS,**

The world is evolving at an unprecedented pace, reshaping industries, economies and societies. The scale and complexity of change is immense - artificial intelligence (AI) is redefining decision-making, regulatory landscapes are becoming more complex and the call for greater transparency and sustainability is louder than ever.

At CTOS, we view these changes as opportunities for progress. As Malaysia's leading credit reporting agency, we are not just adapting to change—we are shaping the future of credit intelligence. Through digital innovation, strong governance, and a firm commitment to sustainability, we are building a more secure, inclusive, and financially resilient ecosystem.



SUSTAINABILITY LEADERSHIP A MESSAGE FROM OUR CHAIRMAN AND GCEO

SUSTAINABILITY AS A STRATEGIC IMPERATIVE

Businesses today are evaluated not only by financial success but also by their impact on society, the environment and governance. For CTOS and the credit industry, this means expanding financial inclusion, reinforcing data security and upholding ethical and responsible decision-making.

Guided by our Sustainability Blueprint, which aligns with our business strategy, we are gradually incorporating ESG principles into relevant aspects of our operations to drive both sustainable impact and business growth. In 2024, we took a significant step forward by establishing actionable, measurable targets to address our material issues head for the coming years. This cross-departmental effort has strengthened our sustainability framework and reinforced CTOS' forward-thinking approach to sustainability.

A core priority this year has been advancing a responsible and resilient credit ecosystem by integrating sustainability considerations into our risk assessments, product offerings, and stakeholder engagements. Collectively, these efforts drive our long-term value creation for our stakeholders and business.

STRENGTHENING DIGITAL TRUST AND CYBER SECURITY

In an industry that is built on data, trust is everything. As financial transactions become increasingly digital, safeguarding information and protecting customer data has never been more critical.

Through Project Elevate, our three-year cyber security initiative, we continue to improve our security infrastructure to align with Bank Negara Malaysia's Risk Management in Technology (RMiT) and the NIST Cyber Security Framework. In 2024, we achieved ISO/IEC 27001:2022 certification for Information Security Management Systems (ISMS), and enhanced fraud detection capabilities, thus reinforcing our commitment to security and risk management.

BUILDING FINANCIAL INCLUSIVITY

Despite economic progress, nearly 12.5 million Malaysian adults remain unbanked or underbanked¹, with rural communities, the elderly and small businesses facing the greatest barriers. Across ASEAN, 81% of Indonesians and 75% of Filipinos face similar obstacles, highlighting the urgent need for broader financial access.

For CTOS, financial inclusion goes beyond access—it is about economic empowerment. In 2024, we expanded financial literacy initiatives, launching the youth-focused financial literacy programme, ensuring the next generation has essential financial skills. We also continued SME support efforts, with participation in SME Biz Day increasing by 50%, connecting approximately 2,000 SMEs with financial solutions and digitalisation strategies to help them scale and grow.

At the same time, financial inclusion remains a priority. Consumers and businesses require real-time access to credit insights to make informed decisions. This year, we introduced e-Know-Your-Business (eKYB), enabling seamless access to financial intelligence. Working closely with fintech players and expanding partnerships, we are bridging the financial knowledge gaps and delivering real-time, reliable insights to a broader group of customers. These efforts translated into higher customer engagement, as reflected in our improved Net Promoter Score (NPS) of 23.1 in 2024 (2023: 14.4).

Invested

RM307,489

to benefit several key community groups in Malaysia



Net Promoter Score (NPS)

23.1 in 2024

ACCELERATING ENVIRONMENTAL RESPONSIBILITY

As a digital-first business, we recognise that our reliance on technology requires a proactive approach to environmental responsibility. The credit industry's infrastructure, including data centers, cloud platforms, and analytics, consumes significant energy. As our digital footprint expands, so does our commitment to reducing our environmental impact.

In 2024, we reduced Scope 2 emissions by 26% compared to our 2022 baseline, demonstrating our focus on energy efficiency and realising Malaysia's carbon reduction targets. We are integrating data-driven energy management solutions, investing in low-carbon technologies, and exploring renewable energy adoption.

¹ <https://theedgemalaysia.com/node/734796>

SUSTAINABILITY LEADERSHIP A MESSAGE FROM OUR CHAIRMAN AND GCEO



EMPOWERING OUR PEOPLE, STRENGTHENING CULTURE

Strong businesses are built on strong people. Leadership at CTOS is not just about financial performance—it is about anticipating future needs, adapting swiftly, and driving meaningful change.

Therefore, we continue to invest in our people, fostering a workplace centered on learning, innovation, and inclusivity. Through initiatives such as People Empowered through Applied Coaching (PEAC) and Sales Conqueror, we are equipping employees with the skills needed to thrive in an evolving industry. We are embedding a culture of continuous learning, ensuring our workforce remains future-ready.

We are also focused on improving the well-being of our employees. To create an environment where people can grow and succeed, we have introduced flexible working arrangements, enhanced benefits and reinforced workplace safety. Additionally, our well-being programmes continue to evolve, supporting work-life balance and career development.

Furthermore, we are also advancing diversity, equity and inclusion within the company. Just as we work to improve financial inclusivity, we are building an organisation where every individual's voice is heard. In 2024, female representation in senior leadership rose to 29%, reflecting our ongoing commitment to creating equitable opportunities.

ENHANCING GOVERNANCE AND TRANSPARENCY

Strong governance is the foundation of trust. As a credit reporting agency, our credibility is built on data integrity, regulatory compliance and ethical business practices. Governance, therefore, is more than just providing oversight, it is about fostering trust and upholding the highest levels of integrity.

Our Enterprise Risk Management Framework ensures that risks are systematically identified and mitigated, allowing us to navigate evolving regulations while ensuring strong ethical conduct. Our Audit Committee (AC) plays a key role in governance oversight, conducting regular assessments and real-time monitoring to uphold compliance and accountability.

As the saying goes, trust is earned, not given. That is why we actively engage with regulators, industry leaders, and stakeholders to refine governance standards, enhance disclosure practices, and align with global sustainability frameworks. We also continue to strengthen anti-corruption measures and reinforce ethical business practices as core pillars of our organisation.

MOVING FORWARD WITH PURPOSE

As the financial and digital ecosystems evolve, so do the challenges and opportunities ahead. CTOS is well-positioned to navigate these shifts, expand our capabilities, and drive meaningful progress in the industry.

We will continue to deliver innovative, responsible, and inclusive financial solutions that empower individuals, businesses, and communities. With the collective strength of our employees, partners and stakeholders, we remain committed to shaping a trusted, resilient, and sustainable credit reporting ecosystem that drives long-term value.

DATO' NOORAZMAN BIN ABD AZIZ

Chairman


ERICK HAMBURGER

Executive Director and
Group Chief Executive Officer

OUR SUSTAINABILITY PROGRESS

OUR SUSTAINABILITY PROGRESS

In 2024, we have made progress toward advancing our sustainability purpose, focusing our efforts to create impact where it matters most to our stakeholders.



Empowering Progress & Resilience

Average monthly visitors to the Knowledge Base site:

2.6 million

(2023: 2.11 million)

Total community investment:

RM307,489

(2023: 219,588)


Net Promoter Score (NPS):

23.1

(2023: 14.4)

SME credit solutions allocation:

RM261,250



Driving Environmental Responsibility

Scope 1 GHG emissions:


ZERO

(2023: 0.65 tCO₂e)

Scope 2 GHG emissions:

301.25 tCO₂e

(2023: 371.03 tCO₂e)



Nurturing Employee Growth

Employee Engagement Index (EEI):

77%

(2023: 75%)

Total training hours for employees:

17,584.4

(2023:15,407.5)

Female representation in senior leadership:

29%


(2023: 23%)

Talent onboarded with specialised expertise:

20 Malaysians

Lean Six Sigma Certification (In progress):

20 employees



Acting with Integrity

Anti-corruption training sessions:

611 employees attended

Confirmed corruption incidences reported:

ZERO

Contribution to local suppliers:

RM23,412,043

WHAT SUSTAINABILITY MEANS TO US

STAKEHOLDER ENGAGEMENT

To effectively address the evolving concerns and priorities of our stakeholders, we maintain proactive engagement with both internal and external groups across our operations. In line with the National Sustainability Reporting Framework (NSRF), we prioritise open communication with all our stakeholders to align our business practices with their expectations.

Frequency of Engagement

W Weekly

M Monthly

E Every 2 Months

Q Quarterly

BA Bi-Annually


A Annually

AR As required

D Daily

O Ongoing

T Twice a year



EMPLOYEES

Key Concerns

- Open and equitable dialogue.
- Improve work-life integration.
- Increase engagement by aligning objectives strategically.

Our Response

- Established a regular feedback channel through engagement surveys.
- Implemented work-from-home (WFH) policies, flexible working arrangements, and wellness programmes.
- Launched a process improvement project to enhance cross-departmental collaboration and drive organisational success.

Engagement Platform

- Employee Engagement Survey
- “WE CARE” activities
- Town Hall Sessions

Frequency of Engagement

A

O


Q

Map to Material Matters:

M6**M7****M8**

Risks:

R3**R4**



GOVERNMENT & REGULATORY BODIES

Key Concerns

- Prompt and reliable reporting.
- Clear communications on ESG-focused sustainability efforts.
- Strengthened compliance and data-driven decision-making.

Our Response

- Implemented internal control systems to ensure compliance with evolving regulations and standards.
- Conducted regular training programmes for employees to stay updated on regulatory requirements.
- Established a dedicated liaison team to facilitate clear and timely communication.
- Published detailed disclosures in line with regulatory guidelines to enhance transparency.
- Engaged third-party auditors to verify adherence to legal standards.

Engagement Platform

- Continuous active engagement and consultations
- Independent audit

Frequency of Engagement

O

A

Map to Material Matters:

M1**M2****M3**

Risks:

R1**R2****R4****R5**

WHAT SUSTAINABILITY MEANS TO US STAKEHOLDER ENGAGEMENT



SHAREHOLDERS & INVESTORS

Key Concerns

- Transparent decision-making for shareholders.
- ESG-driven risk management implementation.
- Robust financial performance and resilience.

Our Response

- Conducted 65 investor meetings to communicate market expansion strategies across ASEAN regions, detailing progress and opportunities.
- Provided regular updates on financial performance, legal updates, growth drivers, profitability, and cost management.
- Reported on measurable progress through sustainability reports and disclosures.

Engagement Platform

- Annual General Meetings (AGMs)
- Website
- Investors and analyst briefings, roadshows, group meetings, private sessions, and forums
- Announcements to Bursa on financial performance

Frequency of Engagement

A
AR O
M Q
Q

Map to Material Matters:

M2 M3 M4
M10

Risks:

R1 R5 R6



CUSTOMERS

Key Concerns

- ESG transparency in credit assessments.
- Equal access to financial services.
- High standards of data security and privacy.

Our Response

- Implemented advanced data security measures and conducted real-time monitoring.
- Achieved ISO/IEC 27001:2022 certification for Information Security Management Systems (ISMS).

Engagement Platform

- Checkpoint call / fact-to-face appointment
- Multi-channel touchpoints
- Customer Onboarding
- Regular meetings and day-to-day interactions
- NPS Survey
- Service Level Agreements (SLAs) Management response
- Product and Solution Training

Frequency of Engagement

D M Q
D
D
D
BA
O
M



Map to Material Matters:

M2 M3 M4
M10

Risks:

R1 R5 R6

WHAT SUSTAINABILITY MEANS TO US
STAKEHOLDER ENGAGEMENT

	<div>SUPPLIERS AND BUSINESS PARTNERS</div> <div><div>Key Concerns</div><ul style="list-style-type: none">• Collective dedication to ESG leadership.• Disclosing environmental efforts.• Collaboration through open dialogue.</div> <div><div>Our Response</div><ul style="list-style-type: none">• Enhanced vendor compliance process with a structured vendor assessment process.• Conducted awareness sessions on procurement policies.</div> <div><div>Engagement Platform</div><ul style="list-style-type: none">• Regular meetings• Strategic dialogues</div>	<div>Frequency of Engagement</div> <div><div>O</div><div>O</div></div>	<div>Map to Material Matters:</div> <div><div>M1</div><div>M2</div><div>M9</div><div>M10</div></div> <div><div>Risks:</div><div><div>R1</div><div>R5</div><div>R6</div></div></div>
	<div>LOCAL COMMUNITIES</div> <div><div>Key Concerns</div><ul style="list-style-type: none">• Enhance credit reporting for SMEs.• Maintain strong data governance and ethical standards.• Diligent oversight to achieve regulatory compliance.</div> <div><div>Our Response</div><ul style="list-style-type: none">• Introduced simplified credit reporting tools and user-friendly platforms for SMEs.• Hosted SME networking events to promote knowledge-sharing and collaboration.• Conducted roadshows and webinars nationwide to promote financial education and literacy.</div> <div><div>Engagement Platform</div><ul style="list-style-type: none">• Independent stakeholder engagement survey• Webinars, roadshows, social media, and emails• Online survey</div>	<div>Frequency of Engagement</div> <div><div>A</div><div>W</div><div>A</div></div>	<div>Map to Material Matters:</div> <div><div>M2</div><div>M5</div><div>M10</div></div> <div><div>Risks:</div><div><div>R2</div><div>R6</div></div></div>

WHAT SUSTAINABILITY MEANS TO US

MATERIAL MATTERS

The digital financial ecosystem in ASEAN is undergoing rapid transformation. To remain competitive in the ever-changing digital market, we conduct materiality assessments every three years to ensure our strategy aligns with stakeholder priorities. This enables us to focus on solutions that empower our communities and support long-term value creation and sustainable practices.

MATERIALITY METHODOLOGY

Following the materiality assessment conducted in FY2023, we consistently reviewed the material issues identified to ensure their continued relevance to our business, impacts, and alignment with our internal and external stakeholders.

1

IDENTIFICATION

- Compiled ten preliminary material topics from sources such as global industry trends, GRI and CTOS' current priorities.
- Benchmarked these topics against our industry peers.

2

ENGAGEMENT

- Conducted qualitative interviews and a quantitative survey with over 40 participants in Malaysia.
- Collected feedback from diverse stakeholders, including employees, investors, regulators, customers, and suppliers.

3

PRIORITISATION

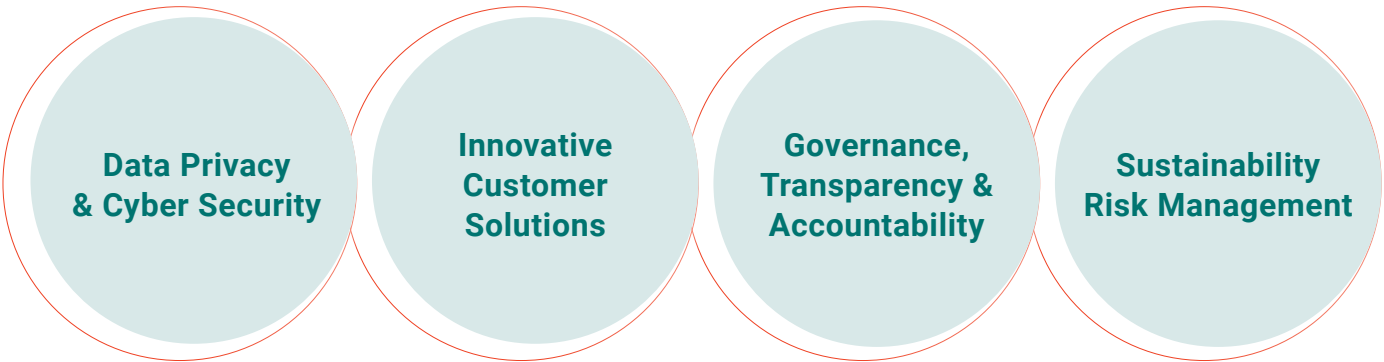
- Stakeholders' inputs were ranked based on the critical levels of each group's influence and impact.

4

VALIDATION

- Collaborated with management to define and finalise new material matters and their definitions.
- Obtained the Board's endorsement and confirmation of the finalised material matters.

Our materiality assessment identified four key priorities that are most relevant to our stakeholders. While all ten issues will be managed, these four material issues will primarily guide our strategic decisions over the next three years.



WHAT SUSTAINABILITY MEANS TO US

MATERIAL MATTERS

OUR MATERIAL MATTERS

M1 Data Privacy & Cyber Security

Definition

Safeguard stakeholder data and privacy while ensuring business continuity through a strong cyber security system and promoting awareness of data privacy best practices.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



M2 Governance, Transparency, & Accountability

Definition

Ensure strong governance, transparency, and accountability across our value chain to protect our business and stakeholders against all forms of misconduct.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



M3 Sustainability Risk Management

Definition

Effectively identify, manage, and mitigate ESG risks to ensure long-term value creation for our stakeholders and business.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



M4 Innovative Customer Solutions

Definition

Enhance customer experience by delivering high-quality products and services through innovative technology and responsible practices, ensuring fair credit for all customers.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



WHAT SUSTAINABILITY MEANS TO US

MATERIAL MATTERS

M5 Financial Inclusion & Community Empowerment

Definition

Empower stakeholders, particularly underserved communities, with the knowledge, skills, and understanding of financial concepts and practices that enable them to achieve their financial objectives while also addressing other community challenges.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



M6 Diversity, Equity, & Inclusion ("DEI")

Definition

Nurture a workplace culture that respects all employees and ensures equitable and fair treatment regardless of their differences in age, gender, race, and social background.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



M7 Career Development

Definition

Empower employees for the future by equipping them with skills, knowledge, and capabilities to excel in their careers while ensuring competitive compensation and remuneration structures.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



M8 Employee Welfare & Well-being

Definition

Promote a positive work culture by taking care of employees' physical and mental health and wellness while ensuring trust, open communication, and strong employee engagement.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



WHAT SUSTAINABILITY MEANS TO US

MATERIAL MATTERS

M9 GHG Emissions & Energy Consumption

Definition

Continuously minimise GHG emissions, particularly by reducing energy consumption, in an effort to mitigate climate change and support the transition towards a low-carbon economy.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:



Key Risk



M10 Environmental Stewardship

Definition

Responsibly manage environmental resources and consumption in a socially equitable and economical manner, including responsible water, materials, and waste management.

Capitals:



Strategic Focus Area:



Stakeholders



UN SDGs:

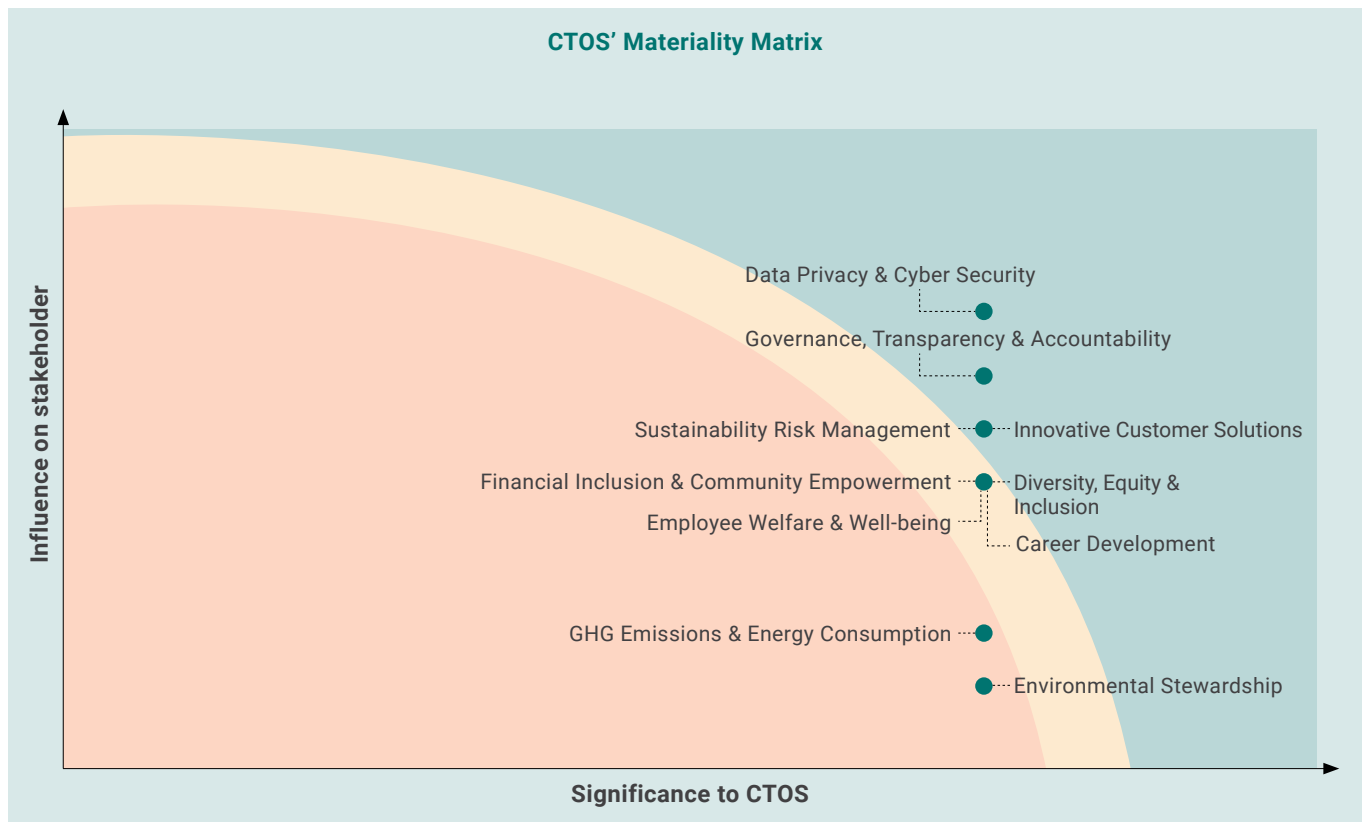


Key Risk



MATERIALITY METHODOLOGY

The materiality matrix highlights the importance of material matters for our business and stakeholders.



WHAT SUSTAINABILITY MEANS TO US

OUR SUSTAINABILITY APPROACH

At CTOS, sustainability is at the core of our mission to empower individuals and businesses to achieve financial confidence and resilience. We leverage our expertise in data-driven solutions to enhance financial literacy, equipping our stakeholders with the tools and knowledge needed to make informed decisions in an increasingly complex financial landscape.

Beyond financial empowerment, we are deeply committed to addressing broader societal challenges such as climate change and social inequality. We aim to drive meaningful change that contributes to long-term economic stability and growth.

CTOS SUSTAINABILITY BLUEPRINT

We are committed to helping individuals and businesses make informed credit decisions, with the goal of positioning Malaysia as the hub of credit reporting in ASEAN. Anchored on our Sustainability Blueprint, we drive financial well-being across the region through innovation and data-driven solutions. The Blueprint is built on four pillars - **Empowering Progress and Resilience, Driving Environmental Responsibility, Nurturing Employee Growth and Acting with Integrity** - guiding every employee in fostering sustainable and responsible growth.

Aligned with the United Nations Sustainable Development Goals (UN SDGs) and national priorities, our Blueprint ensures that our sustainability initiatives drive long-term value for the Group and stakeholders, and a sustainable future for all.



WHAT SUSTAINABILITY MEANS TO US

OUR SUSTAINABILITY APPROACH

CTOS SUSTAINABILITY ROADMAP

Our Sustainability Roadmap provides a strategic framework to drive responsible growth. We integrate short-term targets as part of our roadmap to ensure a more streamlined approach to achieving our goals. With clear, measurable targets, we can track our progress effectively and refine our strategies as needed to global standards and regulatory requirements.

Last year, we developed a broad sustainability roadmap to guide our initiatives and set the foundation for our short-term goals. While this approach provided a comprehensive view of our sustainability ambitions, it became evident that a more targeted strategy was needed to ensure impactful progress on the issues most relevant to CTOS and its stakeholders.

In 2024, we revised our sustainability strategy to focus directly on our material matters, ensuring alignment with areas of high impact and importance. To support this refined approach, we conducted a target-setting workshop through interdepartmental collaboration, enabling key departmental heads to establish short-term, medium-term, and long-term goals. This exercise facilitated the development of both quantitative and qualitative targets within each sustainability pillar.

Incremental Targets (Short-Term)

2025

Achieve a 15% reduction in Scope 2 emissions by 2025, based on our 2022 baseline

Related Material Matter

M9

Stakeholders Impacts

Implement data collection systems and set initial targets, including Scope 3 emissions

Related Material Matter

M9

Stakeholders Impacts

Develop an Environmental Policy

Related Material Matter

M10

Stakeholders Impacts

Establish a third-party assessment on vendors on Environmental, Social and Governance (ESG) Declarations

Related Material Matter

M3

Stakeholders Impacts

As we move forward, we will continue to refine our targets and gradually expand our climate-focused initiatives, including developing a comprehensive decarbonisation strategy. We will ensure that our sustainability initiatives deliver tangible outcomes for the credit reporting industry and the communities we serve.

CTOS Sustainability Policy

In 2024, we conducted a comprehensive policy gap analysis across key departments to identify areas for alignment with ESG ratings and industry best practices. To drive measurable progress, we are developing a Group-wide Sustainability Policy with a view to provide a clear framework for employees to integrate ESG principles into our daily operations. We aim to secure Management and Board approval for implementation in 2025.

Legend

MATERIAL MATTERS

M1

Data Privacy & Cyber Security

M2

Governance, Transparency, & Accountability

M3

Sustainability Risk Management

M4

Innovative Customer Solutions

M5

Financial Inclusion & Community Empowerment

M6

Diversity, Equity, & Inclusion

M7

Career Development

M8

Employee Welfare & Well-Being

M9

GHG Emissions & Energy Consumption

M10

Environmental Stewardship

STAKEHOLDERS

Employees

Shareholders & Investors

Customers

Suppliers & Business Partners

Government & Regulatory Bodies

Local Communities

SUSTAINABILITY PILLARS

Empowering Progress & Resilience

Driving Environmental Responsibility

Nurturing Employee Growth

Acting with Integrity

WHAT SUSTAINABILITY MEANS TO US

OUR COMMITMENTS TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

At CTOS, our approach to the UN SDGs is guided by a strategic focus on the areas where our business can create the greatest impact. We have prioritised key SDGs that align closely with our core competencies, stakeholder expectations, and the potential to drive long-term societal change.

Our efforts are particularly targeted at advancing Financial Inclusion and Community Empowerment—leveraging our expertise in data-driven solutions to address social challenges and promote equitable access to financial opportunities across ASEAN. This targeted approach aligns our initiatives to tackle pressing regional issues and contribute to sustainable economic growth for the communities we serve.



WHAT SUSTAINABILITY MEANS TO US

OUR COMMITMENTS TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

Key UN SDGs



UN SDG 4:
Quality Education

Why It Matters:

By promoting education, CTOS invests in the development of future leaders, innovators, and entrepreneurs who can drive positive change and contribute to economic growth and social progress.

Our Contributions:

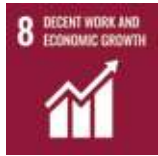
- Provided opportunities to enhance relevant skills such as financial knowledge.
- Trained our employees on the latest digital tools and solutions.

Stakeholders Impacted:



Material Matters:

M5 M7



UN SDG 8:
Decent Work and Economic Growth

Why It Matters:

CTOS can expand its market reach and create better job opportunities while enabling a thriving economy in financial stability.

Our Contributions:

- Provided accessible employee health and safety programmes.
- Implemented clear policies for executive compensation.
- Executed training and development for all employee levels.

Stakeholders Impacted:



Material Matters:

M4 M7 M8



UN SDG 10:
Reduced Inequalities

Why It Matters:

A more equitable society offers better stability, social cohesion and economic opportunities for marginalised communities.

Our Contributions:

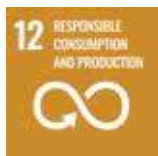
- Embedded DEI principles in our Code of Business Conduct and Ethics (the Code).
- Executed inclusive hiring strategies.

Stakeholders Impacted:



Material Matters:

M5 M6 M8



UN SDG 12:
Responsible Consumption and Production

Why It Matters:

Minimising our environmental footprint through resource usage to sustainable technologies fosters a more socially responsible business ecosystem.

Our Contributions:

- Optimised resources by leveraging the latest technologies in our workforce.
- Provided our customers with various digital options.

Stakeholders Impacted:



Material Matters:

M9 M10

WHAT SUSTAINABILITY MEANS TO US

OUR COMMITMENTS TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

Key UN SDGs



UN SDG 13:
Climate Action

Why It Matters:

We can reduce significant physical and transition risks to help protect our stakeholders from the adverse effects of climate change.

Our Contributions:

- Established short-term carbon reduction targets.
- Promoted sustainability employee engagement.

Stakeholders Impacted:



Material Matters:

M10



UN SDG 16:
Peace Justice and Strong Institutions

Why It Matters:

We safeguard individual rights and freedom to create a conducive environment for business operations and investment.

Our Contributions:

- Strengthened our governance framework.
- Implemented anti-corruption and anti-bribery measures.
- Fostered transparent stakeholder engagement.

Stakeholders Impacted:



Material Matters:

M2 M6



UN SDG 17:
Partnership for the Goals

Why It Matters:

We can leverage the expertise, resources, and networks to drive meaningful change on sustainability issues and scale up initiatives to reach larger audiences.

Our Contributions:

- Formed new partnerships with FinTech companies, expanding consumer access.
- Partnered with the World Bank to strengthen credit reporting and governance standards.

Stakeholders Impacted:



Material Matters:

M5

MEMBERSHIP & ASSOCIATIONS

Our involvement in key industry associations and memberships continues to grow and we aim to participate in selected industry events and engagement programmes to support knowledge-sharing and industry development.

ASSOCIATION

CAN | ceo action network

CEO Action Network (CAN)

ACRA

Association of Credit Reporting Agencies (ACRA)

OUR CONTRIBUTIONS

Co-lead for Workstream 2 (Awareness and Capacity Building).

Actively participated as an ACRA member through engagements.

EMPOWERING PROGRESS & RESILIENCE

- Data Privacy & Cyber Security
- Innovative Customer Solutions
- Financial Inclusion & Community Empowerment



EMPOWERING PROGRESS & RESILIENCE

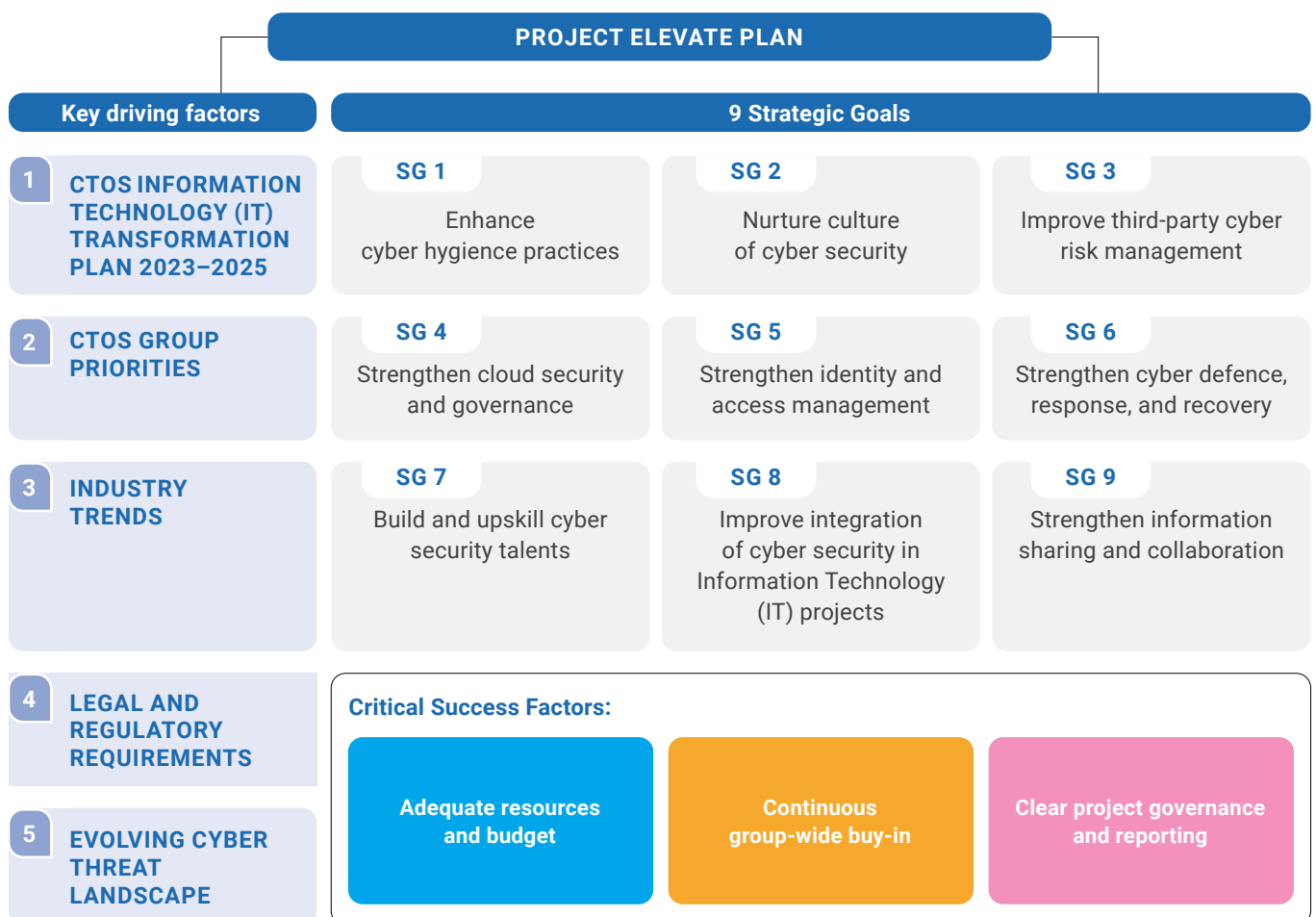
DATA PRIVACY & CYBER SECURITY

Digital technologies have revolutionised credit reporting and financial services, empowering consumers with data-driven insights to make informed financial decisions. At CTOS, we recognise the critical responsibility of managing sensitive personal data that enables individuals and businesses to navigate their financial choices securely. This responsibility goes beyond delivering insights—it requires robust protection against risks such as identity theft and fraud, which can have severe financial and personal repercussions. Thus, safeguarding information is essential to maintaining trust and ensuring the security of those we serve.

Our Approach

We prioritise the security and resilience of our digital ecosystem to address the ever-changing landscape of cyber threats. Our approach to cyber security and data privacy is designed to be proactive, multi-dimensional, and forward-thinking.

Launched in January 2023, Project Elevate has been fundamental to our strategy throughout 2024. This three-year initiative, endorsed by the CTOS Board, is designed to bolster our cyber resilience through a multi-layered defence framework.



EMPOWERING PROGRESS & RESILIENCE

DATA PRIVACY & CYBER SECURITY

We actively monitor the performance and impact of our cyber security initiatives through key metrics and indicators designed to ensure alignment with organisational objectives, regulatory requirements, and industry best practices. As part of Project Elevate (2023–2025), we have established several Key Performance Indicators (KPIs) to track its progress and effectiveness.

Malware protection for endpoints

User awareness training completion

MFA implementation for selected identities

Phishing susceptibility of employees

Incident response testing

Mean time to remediate (MTTR) critical vulnerability

We adopted a structured, multi-layered cyber security framework to safeguard our IT ecosystem, guided by ISO/IEC 27001:2022, Bank Negara Malaysia's (BNM) RMiT and the NIST Cyber Security Framework 2.0. Our in-depth defence approach ensures multiple layers of security so that if one control fails, others remain in place to protect our systems, covering people, processes, and technology. Additionally, we leverage third-party cyber security rating tools to assess and validate our security posture.

Maintaining a Strong Security Governance

Proactive Compliance and Governance

We proactively review our data privacy and cyber security frameworks, policies, and controls to ensure compliance with evolving local and international regulations. Our alignment with industry standards and frameworks remains a priority, with cyber risks consistently addressed as a recurring agenda item in Audit and Risk Committee meetings throughout 2024.

Impacts:

- Achieved ISO/IEC 27001:2022 certification.
- Attained a satisfactory result in an independent external audit for compliance with BNM requirements on continuous access to CCRIS data.

Cloud Security Framework

Aligned with our IT Transformation Plan, we established a cloud security governance framework to ensure secure migration and operations in the cloud. This framework promotes consistent controls, risk assessment, and threat mitigation across cloud environments.

Impacts:

- Strengthened governance and risk management for cloud workloads.
- Enhanced visibility and control through unified monitoring.

Robust Vulnerability and Data Protection

We unified continuous vulnerability assessments into a single-pane-of-glass platform, enabling better risk assessment, vulnerability prioritisation, and faster remediation. In parallel, we refreshed our Data Loss Prevention (DLP) framework to align with evolving business needs and regulatory expectations.

Impacts:

- Strengthened vulnerability management and remediation.
- Enhanced governance for data protection and privacy.

Identity and Access Protection

We deployed an advanced Identity Governance and Administration (IGA) solution to enhance visibility and control over user access to critical systems. This ensures secure access management while maintaining compliance with regulatory requirements.

Impacts:

- Improved identity lifecycle management and access governance.
- Reduced risk through robust user entitlement controls.

EMPOWERING PROGRESS & RESILIENCE DATA PRIVACY & CYBER SECURITY

Building our Risk and Compliance Culture

We prioritise fostering a security-conscious culture, embedding information security as a shared responsibility across all levels.

Cyber Security Day 2024

As part of our initiative to create an immersive learning experience for employees, Cyber Security Day brought together C-level leaders and key industry partners for hands-on demonstrations of cutting-edge cyber security tools and technologies. Interactive quizzes and games kept engagement high, challenging employees to test their knowledge in real-time threat scenarios.



Impacts:

- Engaged 123 employees at this event.
- Achieved a 4.6 out of 5 rating in post-event employee feedback.

Empowering Leadership Skills

Senior leadership and Board members received targeted training to address emerging security threats. These sessions provided essential knowledge to strengthen decision-making and mitigate risks at the highest levels of the organisation.

Impacts:

- Delivered the following cyber security awareness training sessions across all operational markets:
 - Mandatory Cyber Security Awareness Training for all senior leaders.
 - Specialised Training on Business Email Compromise (BEC) and CEO Fraud, attended by 43 executives from the Core Leadership Team (CLT), Senior Leadership Team (SLT), Finance, and Procurement teams.
 - 12 Optional Cyber Security Awareness Sessions open to all employees to enhance overall cyber vigilance.
 - Dedicated Cyber Security Training for Board Members, with four Board members completing the Cyber Security for Board Members programme.

Advancing Cyber Security & Resilience

Our ongoing Project Elevate implementations are steering us towards a Zero Trust approach that enhances our threat detection and response capabilities. This is supported by a comprehensive enterprise security architecture and 'Secure by Design' principles integrated into product development.

Cyber Security Maturity

As part of our cyber resilience journey, we recorded significant improvement in our cyber security maturity level based on the NIST Cyber Security Framework (CSF) 2.0. This milestone reflects our commitment to strengthening our defences across people, processes and technology.

Impacts:

- Achieved cyber security maturity level of 2.9 out of 5.0, based on the NIST Cyber Security Framework (CSF) 2.0 in 2024, an improvement from 1.5 in 2023.
- Surpassed Project Elevate's 2025 target ahead of schedule.
- Enhanced threat detection, response, and risk mitigation capabilities.

EMPOWERING PROGRESS & RESILIENCE

DATA PRIVACY & CYBER SECURITY

Threat Protection and Detection

We strengthened our cyber security posture by enhancing Endpoint Detection and Response (EDR) systems, supported by 24/7 Security Operations Centre (SOC) monitoring and continuous vulnerability assessments.

This proactive approach reinforces protection for the entire organisation, including critical platforms and people against evolving cyber threats. To further strengthen our detection capabilities, we integrated identity-based threat protection and detection to enable faster threat identification and response in an increasingly complex threat landscape.

Impacts:

- Phishing report rates increased to 24% (2023: 15%), while susceptibility to phishing attacks decreased to 5.5% (2023: 13.5%).
- Improved threat detection and response against phishing and endpoint attacks across critical systems.

Incident Response and Third-Party Risk

Effective incident response is crucial in mitigating disruptions, safeguarding our operations and maintaining the trust of our customers. We strengthened our incident response framework through updated playbooks, tabletop exercises, and cyber drill simulations. By conducting these exercises, we prepared our teams to act confidently and swiftly in critical situations. We also implemented mandatory cyber security requirements for critical IT vendors to enhance third-party cyber risk management.

Impacts:

- Improved incident response readiness and operational resilience.
- Strengthened third-party security across the critical supply chain.

Our 2025 Outlook

Building on the principles of Project Elevate, we remain committed to strengthening cyber resilience through targeted initiatives. This includes modernising our backup and recovery strategy with advanced ransomware protection, secure data storage, and improved safeguards for critical information. Beyond on-premise systems, we continue to adopt cloud platforms to enhance IT infrastructure resilience.

By 2025, we aim to further elevate our cyber security maturity beyond the current level of 3.0, guided by the NIST Cyber Security Framework 2.0. Our focus will be on advancing network security through Zero Trust principles, ensuring secure access for employees, regardless of location, to support a modern, flexible working environment.

We will continue to streamline our security technologies, regularly reviewing and enhancing our tech stack to stay aligned with evolving regulatory requirements and the changing threat landscape. Our goal remains clear: to foster a security-first culture, strengthen defences, and maintain a resilient, risk-aware organisation.

EMPOWERING PROGRESS & RESILIENCE

INNOVATIVE CUSTOMER SOLUTIONS

Innovation acts as a key driver in enhancing our customers' financial credit health. Our solutions address evolving stakeholder needs, empowering smarter, more responsible decision-making in today's rapidly expanding digital economy. By staying attuned to customer expectations, we build trust, strengthen our reputation, and deliver meaningful value. This approach fosters long-term partnerships and equips businesses and individuals with the confidence to navigate an increasingly complex financial landscape.

Our Approach

Our approach to understanding and addressing customer needs is both agile and tailored. At CTOS, we emphasise a digital-first strategy, streamlining processes to enhance efficiency and deliver an exceptional customer experience. To ensure our employees can adapt to customer-focused operations, we provide comprehensive training programmes and maintain responsive feedback channels. This enables us to continuously refine our products and solutions, keeping them relevant and effective for our customers.

We also prioritise robust data security measures and adhere to the highest industry standards and certifications. These controls help reinforce the reliability of every customer interaction across the region.

To meet the evolving needs of our key customer groups, we continuously refine and tailor our solutions:

KEY ACCOUNTS – MALAYSIA

- Deliver a complete suite of solutions covering the entire credit lifecycle, acquisition, and onboarding to monitoring and recovery.
- Detect fraudulent applications with solutions such as eKYC and IDGuard to address rising digital breaches and online fraud.
- Support Key Account customers manage risk and make informed lending decisions through Comprehensive Portfolio Review and Analytics services.
- Provide comprehensive KYC screening and due diligence services with global coverage and Politically Exposed Persons (PEPs) to ensure robust compliance and risk mitigation.

COMMERCIAL

- Utilise CTOS Credit Manager, a credit risk management platform that offers SMEs immediate access to critical data and insights for informed decision-making and risk reduction.
- Leverage Credit Manager Xpress, a mobile-optimised, user-friendly platform that enhances accessibility and improves user experience.
- Apply eTR to share credit information on customers or vendors, supporting the overall credit ecosystem.

DIRECT-TO-CUSTOMER (D2C)

- Empower consumers to manage their credit health through self-check tools.
- Offer credit monitoring to track changes in credit profiles, including new applications, missed payments and address updates, helping to detect potential identity fraud.
- Provide insights into how credit scores influence long-term financial well-being.

EMPOWERING PROGRESS & RESILIENCE

INNOVATIVE CUSTOMER SOLUTIONS

Digital Innovations for Better Customer Experiences

User-Centric Digital Systems

We design digital tools that simplify processes and enhance user experiences, enabling customers to manage online tasks and gain clear insights into their financial and credit health. In 2024, we introduced e-Know-Your-Business (eKYB), which provided customers with easier access to key features and reduced the number of steps required.

Impacts:

- Reduced the time required for businesses and individuals to complete eKYB checks.
- Ensured data security while mitigating fraud risks.
- Minimised manual verification errors, improving compliance accuracy.
- Supported paperless processes, reducing environmental impact.

Credit Monitoring and Security

As digital transactions and data sharing become increasingly common, the risk of identity theft and credit fraud has grown. Safeguarding financial data is essential to ensuring the financial security and resilience of individuals and businesses. In April 2024, we expanded the CTOS Mini Programme on Touch 'n Go (TNG) by launching Credit Monitoring.

This service monitors users credit profile closely and provides real-time alerts on critical changes—such as new account openings, missed payments or signs of potential fraud. By staying informed, users can take quick action to safeguard their credit health and prevent financial setbacks before they happen.



Impact:

- 29,556 number of user subscriptions.

 For more information on these products, read [here](#).

Targeted Credit Solutions

Through targeted credit solutions such as SME Score and Credit Manager, we enhanced financial inclusion within the SME communities to access the credit they need. The SME Score is a comprehensive credit risk assessment tool designed specifically for SMEs. It evaluates their creditworthiness by analysing data from multiple sources, such as Central Credit Reference Information System (CCRIS) and CTOS' proprietary data, giving businesses a clear credit score.

Credit Manager, on the other hand, is a platform that helps businesses manage and monitor their customer credit information. By using this tool, businesses can improve their credit management practices.



Impact:

- Allocated a total of RM261,250 for SME credit solutions.

EMPOWERING PROGRESS & RESILIENCE INNOVATIVE CUSTOMER SOLUTIONS

Re-introduced CTOS Verified Service

We re-introduced the enhanced CTOS Verified service, offering SMEs the CTOS Verified Seal to strengthen their online credibility. This seal enhances visibility and trust, enabling businesses to access new opportunities. In addition to boosting credibility, CTOS Verified companies gain exclusive access to national networking events, consulting workshops and marketing coaching. This service not only opens new opportunities but also improves credibility with potential clients, suppliers, and business partners.



Impacts:

- 5 SMEs obtained the CTOS Verified Seal in 2024, bringing the cumulative total to 26 SMEs.
- Increased business opportunities by enhancing visibility and transparency, strengthening trust with potential partners and clients.

Upskilling Our Employees for Better Service

Specialised Training Programmes

We introduced targeted training programmes for our customer-facing employees to ensure they are equipped with the skills and knowledge necessary to deliver high-quality service. These programmes were designed to address the evolving needs of our customers and enhance the overall customer experience. They covered key areas such as effective communication, problem-solving, and handling complex customer queries, with a focus on empathy and responsiveness.

We also included training on our latest digital tools and solutions, ensuring that employees are proficient in using these resources. This helps our teams to respond quickly and effectively to customer needs, ultimately improving customer satisfaction.



Impacts:

- 48 face-to-face training sessions delivered to customers.
- Approximately 4,600 training sessions held.

EMPOWERING PROGRESS & RESILIENCE

INNOVATIVE CUSTOMER SOLUTIONS

Strengthening Strategic Alliances

Partnering For Customer Solutions

In 2024, we strengthened our strategic alliance with Telekom Malaysia, broadening our service offerings to provide complementary solutions that elevate customer experiences. Our partnership with Unifi Business (Telekom Malaysia) helps SMEs understand how credit reporting supports better risk management. Through our Company/Business Profile Report (CBPR), SMEs gain quick insights into potential clients and suppliers, including updated SSM records, CCRIS data, litigation, bankruptcy, and trade references.

Impacts:

- Offered up to 1,000 free CBPR reports for Unifi Business Club (UBC) members.
- UBC members received up to 20% off on three additional CBPR and CBPR Plus reports each.
- Promoted financial literacy on credit reporting and risk management.



Overall Impact Highlight

Achieved an **NPS score of 23.1** (2023:14.4)

Our 2025 Outlook

Looking ahead, we anticipate sustained growth in recurring usage from key sectors while strengthening fraud prevention capabilities through regulatory-aligned digital solutions. Our consumer solutions enable individuals to monitor their financial health, manage spending wisely, and receive alerts on compromised personal information or missed payments. We continue to drive financial literacy awareness through social channels and collaborations with the Ministry of Finance (MoF), BNM, and PayNet, strengthening our role in Malaysia's financial empowerment agenda. By integrating all elements of the service journey, we aim to raise service quality, address customer pain points and drive adoption and optimisation of our solutions.

For our SMEs, we will continue to redefine SME customer engagement with the introduction of a personalised service model by our Customer Success Team. This initiative offers end-to-end (e2e) support, from onboarding to e2e servicing and contract renewal, ensuring a seamless and tailored experience. As digital fraud risks grow, our focus remains on delivering accessible, reliable credit solutions that empower individuals and businesses alike.

We are launching a fully digital onboarding journey, providing SMEs with seamless integration into our Credit Management platform and significantly reducing activation time for quicker access to credit information. Additionally, we are enhancing CTOS Verified, a new verification standard that helps businesses strengthen their brand credibility. To drive digital adoption, CTOS is partnering with a leading Cyber Security provider to introduce the Cyber Security Score, empowering SMEs to build a safer business ecosystem.

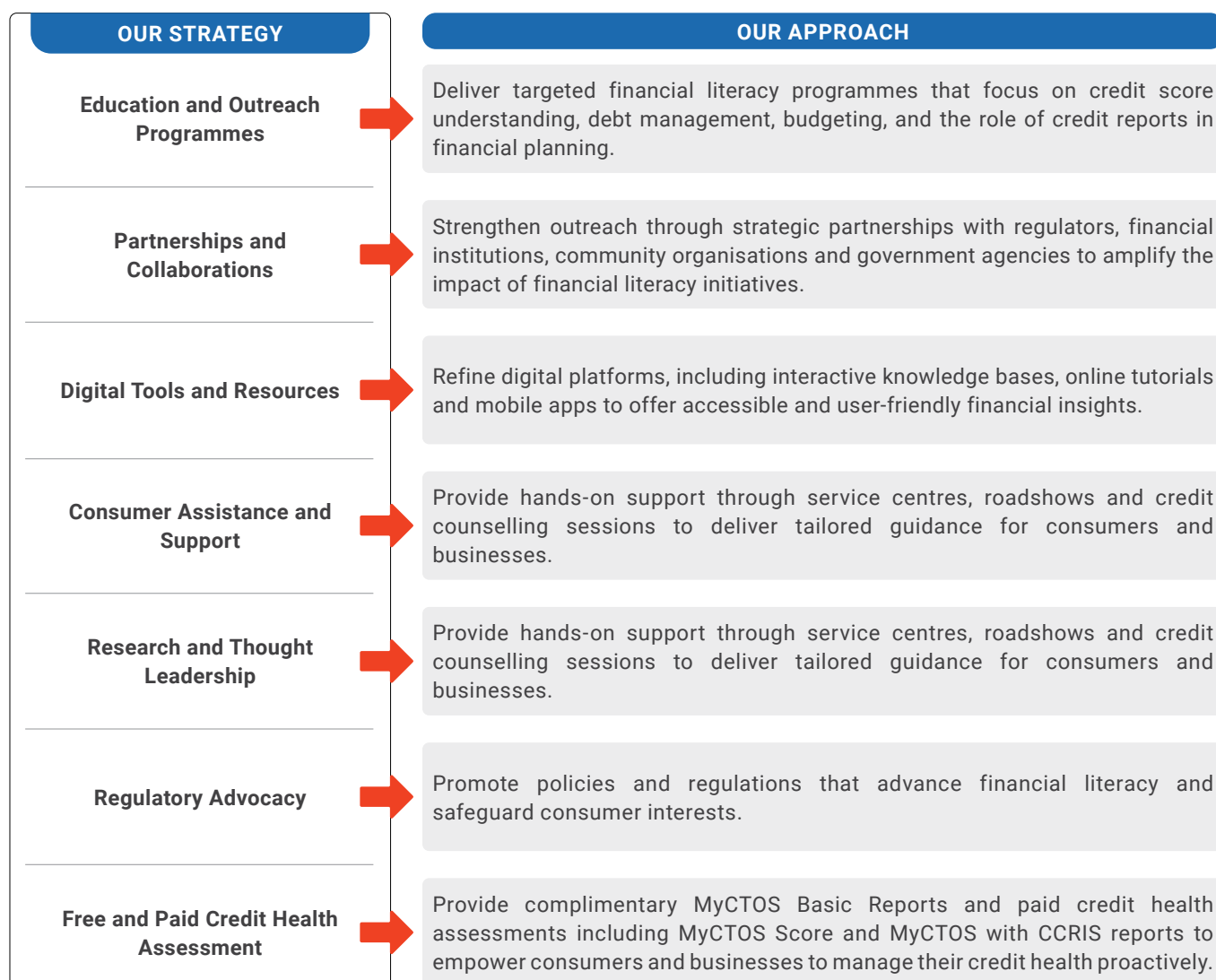
EMPOWERING PROGRESS & RESILIENCE

FINANCIAL INCLUSION & COMMUNITY EMPOWERMENT

At CTOS, we drive financial inclusion to unlock economic opportunities by providing individuals and businesses access to essential credit and services that fuel growth. Digital advancements have made these resources more affordable, ensuring that even underserved communities can benefit. Therefore, we recognise the importance of empowering these communities with the right tools and knowledge to foster social equity, helping them confidently navigate financial systems.

Our Approach

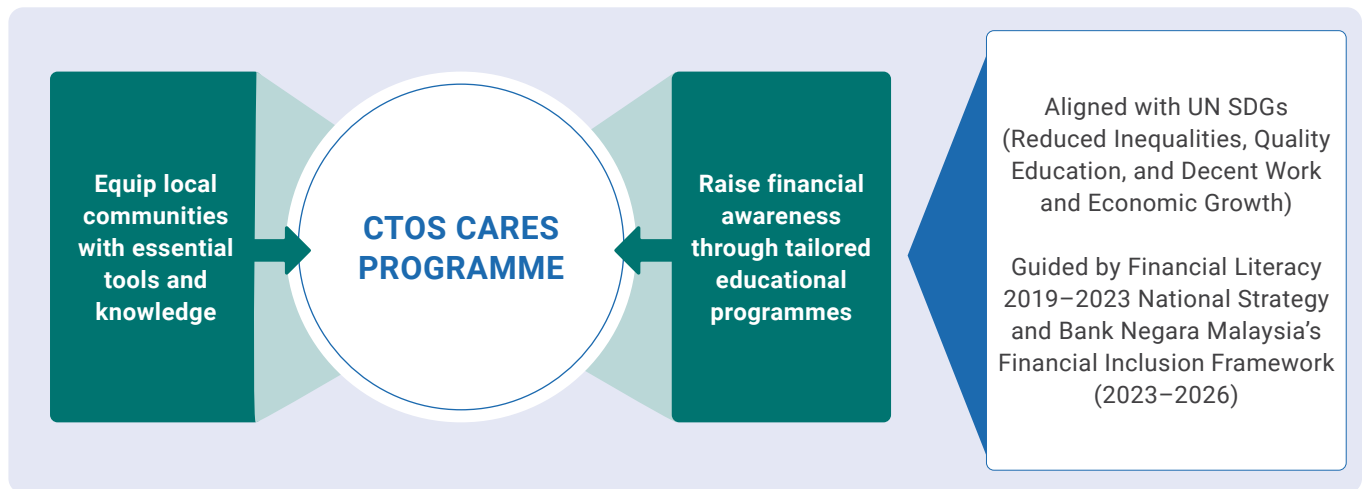
We remain focused on equipping communities with the tools and knowledge needed for informed decision-making. This includes supporting SMEs and individuals in underserved communities to learn and adapt to evolving financial landscapes. By bridging accessibility gaps, we promote a more inclusive and sustainable economy grounded in ethical practices that drive societal progress and long-term growth.



We offer affordable financial products and services, particularly for underbanked and unbanked communities. Through the CTOS Cares programme, we support initiatives aligned with the UN SDGs. Guided by the Financial Literacy National Strategy (2019–2023) and BNM's Financial Inclusion Framework (2023–2026), we are working towards removing barriers to financial access and strengthening individuals' financial capabilities.

EMPOWERING PROGRESS & RESILIENCE

FINANCIAL INCLUSION & COMMUNITY EMPOWERMENT



Financial Inclusion

Our focus on promoting financial inclusion is important to amplify our impact in Malaysia's communities. Through our targeted outreach programmes, we provide personalised credit counselling and financial coaching, offering tailored support at service centres and roadshows.

Strategic Partnership to Drive Financial Literacy

Collaboration is an important component in reinforcing our impact in communities. By partnering with government agencies, financial institutions and Non-Governmental Organisations (NGOs), we equip individuals with the right tools and skill sets to improve their financial knowledge.

Among our key events is the MADANI Rakyat 2024 Programme, conducted in collaboration with the MoF. During this event, CTOS provided on-site credit report checks, allowing visitors to directly access their credit information and better understand their credit standing.



Impacts:

- Engaged 5,000 individuals across seven events during MADANI Rakyat.
- Engaged over 5,000 customers during financial inclusion events for underserved and suburban communities.
- Conducted a total of 78 events in 2024, engaging 16,000 individuals.

EMPOWERING PROGRESS & RESILIENCE

FINANCIAL INCLUSION & COMMUNITY EMPOWERMENT

Reaching Out to Underprivileged Students

We drive change through education by addressing financial barriers to unlock the potential of young learners. Through our CTOS Cares programme, we supported students with a package worth RM300, consisting RM100 cash and essential school supplies such as bags, shoes, socks and stationery.



Impact:

- Delivered RM30,000 in aid to 100 underprivileged students from Sekolah Kebangsaan Tasek Permai, Ampang.

Financial Literacy

We believe that financial literacy is the foundation of financial inclusion. Our initiatives focus on raising awareness of credit health and responsible financial management through digital resources and strategic community programmes. These efforts go hand in hand with our financial inclusion initiatives, ensuring that underserved communities not only gain access to financial services but also develop the confidence and capability to use them effectively.

Future-Proofing Our Youths

We are dedicated to equipping communities, especially the younger generation, with essential financial knowledge to help them secure brighter futures and thrive in the digital economy. Working with our partners, we introduced Youth-focused Financial Literacy Programmes to raise awareness of financial management and credit health awareness.

Targeted at youths aged between 18–25 years old, these initiatives emphasise the importance of establishing a credit identity, building credit scores, protecting their identity and personal data, including managing their finances and debts.



Impacts:

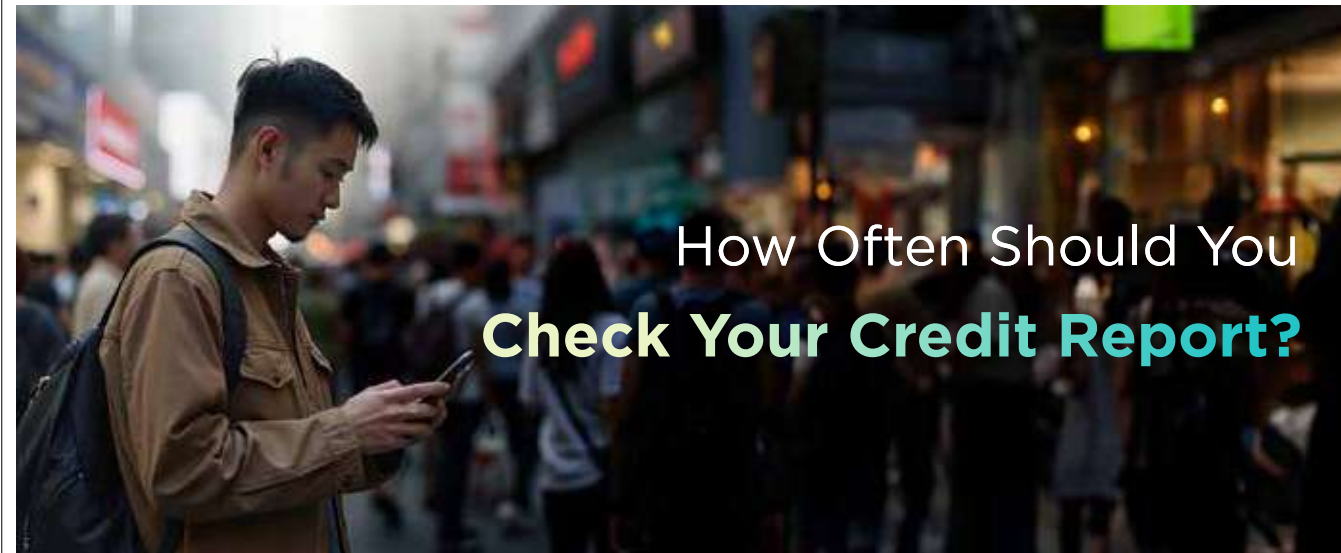
- Empowered 500 students with critical financial knowledge and skills.
- Partnered with SEGi College and University Kebangsaan Malaysia (UKM).

EMPOWERING PROGRESS & RESILIENCE

FINANCIAL INCLUSION & COMMUNITY EMPOWERMENT

Digital Financial Education

We have expanded our efforts to promote credit score awareness and financial literacy through digital platforms. The CTOS Knowledge Base on our website offers regularly updated content in English, Bahasa Malaysia and Mandarin to help our customers from diverse communities. This resource helps users monitor their credit status and make informed financial decisions. As a result, the average credit score among users was 597*.



Impacts:

- Published 26 articles on credit management and improvement in the Knowledge Base.
- Improved average monthly visitors to Knowledge Base site to 2.6 million, (2023: 2.11 million).
- Increased self-check users to 4.4 million (2023: 3.64 million).

* The data is based on the 2024 customer base of 1.1 million.
For more information on CTOS Knowledge Base, visit our website at ctos.credit.com.my

Overall Performance



Total amount invested in the community where the target beneficiaries are external to the listed issuer

2024
RM307,489

2023: RM219,588
2022: RM19,390



Number of beneficiaries of the investment in communities

2024
1.0

2023: 1.0
2022: 1.0



Quantifiable output/outcome of specific results, achievements or benefits of community investments

2024
16,000

2023: 25,000
2022: 30,000

EMPOWERING PROGRESS & RESILIENCE FINANCIAL INCLUSION & COMMUNITY EMPOWERMENT

Empowering SMEs

With over 22,000 SMEs, we expanded our efforts to enable more SMEs to access credit facilities and adapt to the evolving business environment. SMEs are vital to our economic growth, but the rapid adoption of digital tools presents significant challenges. Thus, we are equipping them with the necessary tools, resources, and expertise to strengthen their financial resilience.

CTOS SME Biz Day 2024

CTOS SME Biz Day 2024 achieved a notable 50% increase in participation, highlighting its growing significance. With the theme “Future-Forward SMEs: Grow, Transform, Innovate,” the event brought together key partners, including Unifi Business, Microsoft, Lawbank Asia, Amazon Web Services, and SNS Network.

The event also featured distinguished speakers from SME Corporation Malaysia, Malaysia External Trade Development Corporation (MATRADE), Small and Medium Enterprises Association (SAMENTA), RAM Rating Services Berhad, FashionValet Group, Lawrence Walter Seminars, ZUS Coffee, and Oriental Kopi. Additionally, industry experts shared valuable insights on harnessing information technology, enhancing resilience, and capitalising on growth opportunities amidst economic uncertainties.

Impact:

- Attended by approximately 2,000 participants.
- Conducted soft launch of CTOS’ Cyber Security Score Report, providing businesses with a numerical risk rating to assess their cyber security posture, benchmark against industry peers, and identify areas for improvement.

Building Supportive Ecosystems

With the recent implementation of e-invoicing, businesses both large and small, are required to update their accounting systems, integrate with new platforms and equip their teams with essential skills to stay competitive. Recognising its impact on SMEs to provide training on invoicing implementation, we partnered with leading accounting software providers like SQL and AutoCount, alongside key industry providers.

Impact:

- Supported SMEs in overcoming e-invoicing challenges and navigating the digital shift.

Our 2025 Outlook

Bridging the financial literacy gap and expanding access to financial tools remain critical challenges, especially for rural communities, youth, gig workers, SMEs and lower-income households. A limited understanding of financial management often deepens economic disparities, underscoring the need for targeted interventions to drive inclusive growth.

In 2025, we will continue to focus on expanding credit access for underserved groups, including individuals with limited credit histories and low-income households. By arming SMEs and micro-entrepreneurs with key credit insights and risk evaluation tools, we aim to unlock financing opportunities that drive economic progress and create jobs. Providing businesses with accurate credit assessments will facilitate access to financial resources, thereby fuelling economic activity.

To further enhance financial literacy and inclusion, we will scale up targeted engagement measures through online tutorials, interactive workshops and educational resources. These targeted measures will enhance understanding of credit management, debt handling and financial planning. These initiatives will strengthen the resilience and promote inclusion of Malaysia’s diverse communities.

DRIVING ENVIRONMENTAL RESPONSIBILITY

- GHG Emissions and Energy Consumption
- Environmental Stewardship



DRIVING ENVIRONMENTAL RESPONSIBILITY**GHG EMISSIONS AND ENERGY CONSUMPTION**

Climate change is a critical global challenge with far-reaching consequences for businesses, societies, and ecosystems. From a business perspective, addressing climate-related risks and opportunities enhances our resilience and reinforces our position as a key player in the credit reporting industry.

As a data-driven organisation, CTOS is committed to addressing this issue by reducing greenhouse gas (GHG) emissions through improving operational energy efficiency. By aligning our climate and energy strategies with FTSE and International Financial Reporting Standards (IFRS) standards, we aim to demonstrate responsible corporate stewardship and ensure long-term business growth. This commitment aligns with the National Energy Transition Roadmap (NETR) aspiration of achieving Net Zero emissions by 2050.

Our Approach

Our climate strategy is centred around four key pillars which guide our efforts to align with local and global climate-related standards while driving operational efficiency and fostering innovation.

Governance and Oversight

Effective governance is integral to addressing climate-related risks and opportunities. The Board of Directors is responsible for overseeing these efforts, ensuring alignment with long-term business objectives, and monitoring progress on achieving our climate target. Additionally, our senior management integrates climate initiatives into decision-making processes to prioritise GHG reduction and energy efficiency.

To support our climate goals, we are formalising policies to strengthen governance structures and align with global standards.

Strategy

As a leader in the credit reporting industry, CTOS acknowledges the interconnectedness of climate risks, energy management, and long-term value creation for stakeholders. Our strategy integrates sustainability into core operations while supporting clients in identifying and managing climate-related risks.

Given the nature of data processing, we aim to optimise energy usage across our IT infrastructure, data centres, and green office space. Through digitisation, automation, and cloud-based systems, we are reducing our carbon footprint while enhancing operational efficiency.

Our ongoing efforts to modernise systems and minimise resource consumption reflect our commitment to responsible innovation. These initiatives not only improve our environmental impact but also enhance our ability to meet stakeholder expectations in the financial services sector.

To foster environmental responsibility within our workforce, we conduct regular town halls and employee communications, encouraging collaboration and innovation to drive sustainability initiatives across our operations. Recognising that our operations are significant energy consumers, we prioritise efficient energy usage to minimise power consumption.

DRIVING ENVIRONMENTAL RESPONSIBILITY

GHG EMISSIONS AND ENERGY CONSUMPTION

Reputational Risks	
<div><div>Risk</div><ul style="list-style-type: none">• Stakeholder & Investor Pressure – Institutional investors and customers may expect CTOS to demonstrate strong sustainability commitments; failure to meet these expectations could lead to loss of business.• Perceived Greenwashing – If CTOS introduces sustainability-related initiatives without concrete actions or measurable impact, it may be accused of greenwashing, damaging its credibility.</div>	<div><div>Mitigating Actions</div><ul style="list-style-type: none">• Establish transparent, measurable ESG goals with clear reporting metrics.• Obtain independent third-party validation of ESG initiatives.• Publish annual sustainability reports aligned with global frameworks (e.g., Task Force on Climate-related Financial Disclosures (TCFD), GRI, Sustainability Accounting Standards Board (SASB).• Align corporate policies with international ESG standards (e.g., Principles for Responsible Investing (UNPRI), Science-Based Targets Initiative (SBTi).</div>
Financial Risks	
<div><div>Risk</div><ul style="list-style-type: none">• Changing Regulatory Landscape – Rising compliance costs due to new climate finance regulations.</div>	<div><div>Mitigating Actions</div><ul style="list-style-type: none">• Stay ahead of regulatory trends through active engagement with policymakers.• Develop compliance monitoring tools.• Allocate resources for climate risk regulatory adaptation.</div>
Operational Risks	
<div><div>Risk</div><ul style="list-style-type: none">• Climate-Driven Business Disruptions – Extreme weather events (floods, heatwaves) could impact CTOS’ physical offices, data centres, and operational continuity.• Data Center Energy Consumption – If CTOS’ IT infrastructure relies on high energy consumption from non-renewable sources, it may face higher costs and pressure to transition to greener alternatives.</div>	<div><div>Mitigating Actions</div><ul style="list-style-type: none">• Investing in energy-efficient data centres and cloud solutions powered by renewable energy can reduce operational costs and emissions.• Strengthening disaster recovery and remote work capabilities can ensure business continuity.• Engage in carbon offset programmes.</div>

Risk Management

CTOS’ risk management framework ensures climate-related risks are systematically identified, assessed, and mitigated across all aspects of our operations. Managing these risks is essential to maintaining service reliability and supporting clients in navigating evolving challenges.

PHYSICAL AND TRANSITION RISKS	OPERATIONAL RESILIENCE
We continuously monitor climate-related risks, including extreme weather events that could disrupt operations or impact client creditworthiness. We constantly monitor transition risks, such as regulatory changes and market shifts, which may impact business operations.	We implement business continuity plans to address potential disruptions caused by climate-related events. These measures ensure the integrity and availability of our credit reporting services, even under adverse conditions.

DRIVING ENVIRONMENTAL RESPONSIBILITY

GHG EMISSIONS AND ENERGY CONSUMPTION

Metrics and Targets

Our focus on data-driven insights extends to the metrics and targets we establish for managing energy consumption and climate initiatives. These metrics help us advance toward a low-carbon economy by setting clear and measurable goals.

We track Scope 1 and Scope 2 GHG emissions, as well as energy consumption across our operations, to ensure alignment with global sustainability standards. For 2024, we are in the process of enhancing data granularity by incorporating Scope 3 emissions, including those related to employee commuting, business travel and other indirect activities.

Reduce Scope 2 emissions by 15% by 2025, from 2022 levels.



Achieve Carbon Neutrality for Scope 1 and 2 by 2030.



Reduce Scope 3 emissions by 15% by 2030.

Our Operational GHG Emissions

In 2024, we discontinued the use of company cars, eliminating direct emissions from fuel consumption. Given the nature of our business, which primarily operates in digital and financial services, we do not have significant sources of direct GHG emissions (Scope 1).

As we do not own or operate facilities with combustion processes, industrial equipment, or large vehicle fleets, our carbon footprint is primarily driven by indirect emissions from purchased electricity (Scope 2) and other value chain activities (Scope 3). Consequently, for the year, we recorded zero Scope 1 emissions.

	2022	2023	2024
Scope 1 GHG Emissions (tCO ₂ e)	0.82	0.65	0



Scope 2 Emissions

In 2024, we relocated to a green building designed to enhance energy efficiency and minimise environmental impact. By operating in a greener workspace, this transition will enable us to lower our indirect emissions from purchased electricity and leveraging energy-efficient systems.

	2022	2023	2024
Scope 2 GHG Emissions (tCO ₂ e)	407.57	371.03	301.25
Scope 2 GHG Emissions Intensity (tCO ₂ e/FTE)*	0.78	0.64	0.49
Energy Consumption (MWh)	696.7	634.2	514.96
Energy Intensity (MWh/FTE)*	1.34	1.09	0.84

* FTE includes full-time and temporary employees

Our 2025 Outlook

We are committed to enhancing our climate strategy in alignment with national priorities. Moving forward, CTOS will integrate the principles and strategic focus areas of the National Policy on Climate Change 2.0 and align further with International Financial Reporting Standards (IFRS) Scope 2 climate disclosures to strengthen climate resilience.

As part of our commitment to achieving Net Zero, we are formulating a structured carbon management plan that includes setting science-based emissions reduction targets and improving energy efficiency. This alignment will enable us to set credible emissions reduction targets and enhance our GHG management.

DRIVING ENVIRONMENTAL RESPONSIBILITY

ENVIRONMENTAL STEWARDSHIP

We recognise the importance of managing our environmental footprint, particularly through the impact of our digital infrastructure, resource consumption, and supply chain practices. Beyond regulatory compliance, integrating sustainable practices enhances operational efficiency, reduces costs, and mitigates direct environmental risks. As a leading digital solutions provider, we proactively monitor and manage our environmental impact by upholding stringent environmental standards.

Our Approach

Our approach is guided by a commitment to minimising our environmental footprint, improving resource efficiency, and complying with relevant environmental standards.



Improving Group-wide Water Management

We also focus on improving water conservation efforts and implementing measures to reduce consumption during routine cleaning tasks. Internal campaigns are carried out to encourage environmentally responsible behaviours, emphasising the need to practice responsible water use.

	2022	2023	2024
Water consumption (Megalitres)*	32.89	37.50	5.36

* The 2022 and 2023 figures are calculated using 2019 tariff by Syarikat Bekalan Air Selangor (SYABAS) while the 2024 figure is calculated using the latest tariff rate provided by Suruhanjaya Perkhidmatan Air Negara (SPAN).

Driving Responsible Waste Management

Effective waste management remains a critical environmental priority. At CTOS, we focus on minimising waste through reduction, reuse, resource conservation, and recycling. To drive sustainable practices, we introduced waste management across our operations while encouraging responsible waste management among employees.



Our 2025 Outlook

Following our move into a green building this year, our focus for 2025 will be on strengthening internal environmental initiatives in our workplace. We aim to establish a structured approach to measuring our environmental impact, with a focus on waste generation and water consumption. By setting clear baselines, we will be able to track progress, set realistic targets, and integrate data-driven decision-making into our environmental strategy. Our long-term vision is to integrate engaging employee environmental programmes that align with CTOS’ broader sustainability goals while ensuring responsible resource management.

NURTURING EMPLOYEE GROWTH

- Diversity, Equity, & Inclusion
- Career Development
- Employee Welfare & Well-being



NURTURING EMPLOYEE GROWTH

DIVERSITY, EQUITY & INCLUSION

We believe that true innovation comes from the diverse perspectives and experiences of our people. The ability to attract and retain a diverse workforce is key to understanding the complex needs of our customers and stakeholders. By fostering an environment where DEI is prioritised, we unlock the full potential of our people to drive innovation and deliver exceptional solutions.

Our Approach

CTOS promotes an inclusive workplace where individuals—regardless of race, ethnicity, religion, nationality, gender, or ability—are valued for their contributions. We are committed to fairness and equality, continuously refining our Human Resources (HR) practices to promote diversity, ensure equal opportunities and eliminate discrimination.



Our HR policies promote inclusivity by offering flexible work arrangements that meet employees' diverse needs. We also integrate DEI principles into our Code of Business Conduct and Ethics (COBE), upholding a culture of respect, fairness, and equity across the organisation.

🌐 To learn more about our COBE, read <https://ctosdigital.com/wp-content/uploads/2022/04/Code-of-Business-Conduct-and-Ethics.pdf>

Anti-Discrimination Measures

We enforce a zero-tolerance policy against discrimination, ensuring all employees are treated fairly and equitably. Embedded within our COBE, CTOS Group is committed to equal employment opportunities and a workplace free from discrimination, harassment, and abusive conduct. Employees who experience discrimination should report the incident to their immediate superior and/or the General Manager of Human Resources.

Whistleblowing Mechanisms

Our Whistleblowing policy applies to any witnessed, discovered, or suspected instances of improper conduct or wrongdoing related to CTOS, including but not limited to:

- Fraud
- Bribery
- Abuse of power
- Conflict of interest
- Theft or embezzlement
- Misuse of the Company's property
- Non-compliance with the Company's policies or code of conduct

If the matter relates to...

Any Board member or any Group staff

The IA function

Then the report should be submitted to...

Group Head of Internal Audit (IA) at whistleblower@ctosdigital.com

Whistleblower Committee (WC) at ctosarc@ctosdigital.com

We have established two dedicated channels for reporting whistleblowing concerns. These channels empower employees to raise concerns without fear of retaliation, fostering a safe and supportive environment.

🌐 To learn more about our Whistleblowing Policy, read <https://ctosdigital.com/wp-content/uploads/2023/06/Whistleblowing-Policy.pdf>

NURTURING EMPLOYEE GROWTH DIVERSITY, EQUITY, & INCLUSION

Driving Employee Engagement

We regularly track our progress through employee engagement surveys, using the insights to evaluate our DEI efforts, measure workplace inclusivity, and identify opportunities to enhance equity and representation. These surveys help us measure how well we are fostering a sense of belonging and inclusion within our people.

Impacts:

- 80% of employees agreed with the statement: "I feel included and respected at CTOS regardless of my background", up from 76% in 2023.
- 83% of employees feel proud to be part of CTOS, while 78% feel motivated to give their best effort daily, indicating high emotional engagement.
- Recorded zero incidents of discrimination in our workplace.

Ensuring Fair Recruitment Processes

A positive working environment is foundational to both individual and organisational success. We actively eliminate gender and racial bias throughout our recruitment process. Our hiring managers regularly undergo training to build balanced teams and ensure representation across all levels of the workforce.

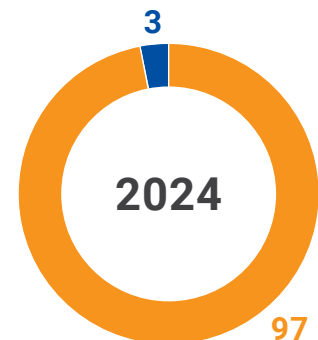
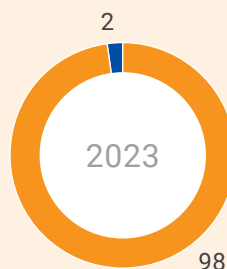
Furthermore, we advertise job openings through inclusive platforms and welcome candidates from diverse backgrounds, including those from underprivileged communities. By offering opportunities such as internships and graduate programmes, we embrace talent with varied educational experiences, fostering an inclusive culture that celebrates diversity and promotes equal opportunities.

To further strengthen this commitment, we have implemented blind resume reviews and diverse interview panels to promote objective and inclusive hiring practices. While we continue to expand our workforce in 2024, we prioritise local talent, particularly for technical roles. This approach helps us attract top talent and address skill gaps in the marketplace, ensuring that our teams reflect a broad spectrum of experiences and perspectives.

Impacts:

- Onboarded 20 Malaysian talent with specialised expertise in data analytics, IT and technical fields.
- Integrated diversity briefing into our onboarding process, ensuring that new hires understand and embrace our inclusive culture from day one.
- Recruited 97% Malaysians and 3% non-Malaysians.

CATEGORY OF EMPLOYEES (%)



- Malaysian
- Non Malaysian

NURTURING EMPLOYEE GROWTH DIVERSITY, EQUITY, & INCLUSION

Empowering Women Across Our Workforce

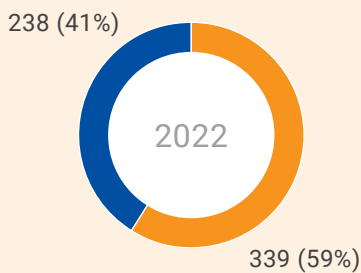
Ensuring equity in the workplace means creating equal opportunities for all employees to thrive, regardless of gender or background. By embedding equity into our workplace culture, we foster greater collaboration, innovation, and inclusivity—allowing us to better serve our communities.

We are committed to providing the necessary support, resources, and development pathways to enable women, particularly in leadership roles, to advance and succeed. To address the barriers of stagnant career progression and ensuring fair access to opportunities, we reinforce our broader commitment to equity and inclusivity at every level of the organisation.

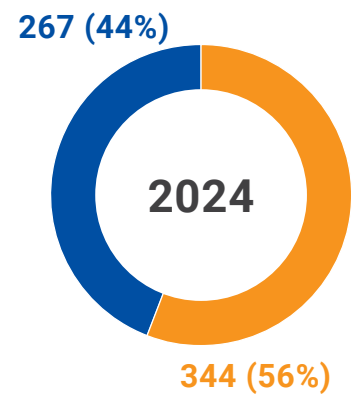
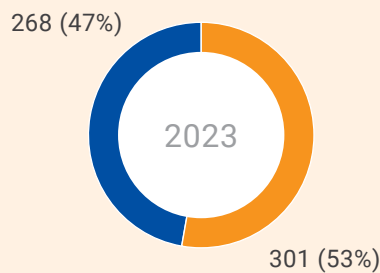
Impact:

- Increased female representation in the workforce to 56% in 2024. The growth in female employees across all levels reflects a shifting workforce demographic, with more women entering the industry.

BREAKDOWN OF EMPLOYEES BY GENDER (NUMBER AND PERCENTAGE - %)

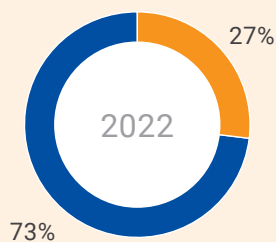


- Female
- Male

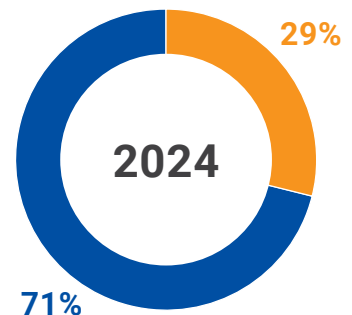
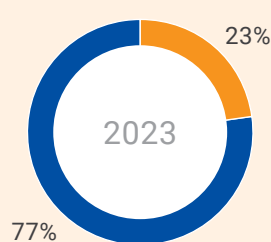


- Increased female representation in senior leadership to 29% in 2024, successfully attracted more female candidates to senior roles.

BREAKDOWN OF SENIOR MANAGEMENT (%)



- Female
- Male



NURTURING EMPLOYEE GROWTH DIVERSITY, EQUITY, & INCLUSION

Celebrating Our People

At CTOS, we actively promote gender and cultural diversity through workplace celebrations and awareness initiatives that reinforce our commitment to inclusivity and gender equality while strengthening employee unity.

International Women's and Men's Day Celebrations

In 2024, we marked International Women's Day and International Men's Day with dedicated celebrations to foster a culture of inclusivity, appreciation, and respect in the workplace. Employees received tokens of appreciation as a gesture of recognition for their contributions.

Impacts:

- Improved a culture of respect and recognition in the workplace.
- Strengthened workplace inclusivity by recognising and valuing all employees, regardless of gender.



International Women's Day

Cultural and Heritage Celebrations

We celebrated the opening of our new office with a multicultural celebration featuring a traditional lion dance, representing Chinese culture, and a Deepavali-themed event with festive costumes, food, and decorations. This blend of traditions showcased the diversity and inclusivity of our workforce, reinforcing a culture where different backgrounds are embraced and celebrated together.



Impact:

- Fostered a sense of belonging among employees from diverse cultural backgrounds.

Our 2025 Outlook

We will continue to prioritise sustained leadership engagement to strengthen our DEI practices. At the same time, comprehensive and ongoing training initiatives focusing on critical areas such as unconscious bias, cultural competence, and inclusive leadership will also be implemented. These programmes will be mandatory for all employees, with specialised modules for managers and senior leaders. Furthermore, we will ensure equitable access to career advancement opportunities, cultivating an environment where all individuals are empowered to reach their full potential and contribute meaningfully to the organisation's success.

NURTURING EMPLOYEE GROWTH CAREER DEVELOPMENT

We prioritise continuous growth by equipping employees with the skills and knowledge to excel and lead. Through upskilling at every level, we are building an agile, high-performance workforce ready to navigate the fast-evolving digital landscape and seize opportunities in the competitive credit reporting industry. This strengthens our competitive edge, drives innovation, and enhances productivity while fostering a skilled and dedicated workforce for long-term growth.

Our Approach

We are committed to building a high-performance, future-ready workforce that thrives in the fast-paced, competitive credit reporting industry. We prioritise employee growth, particularly among managers and leadership teams, by investing in comprehensive training and development to enhance their skills and competencies.

Our programmes equip leaders to manage diverse teams effectively, ensuring leadership excellence at every level. Through our Learning & Development Training Policy, we drive professional growth across three key training pillars - driving a culture of innovation, leadership, and sustainable success.



We adopt a comprehensive approach to track the progress and impact of career development, integrating structured performance reviews, employee growth metrics and engagement surveys. This comprehensive process involves monitoring training programme participation, skills enhancement and assessing internal promotion. In addition, we conduct regular one-on-one discussions and tailor career development plans to ensure they align with each individual's goals and aspirations. Concurrently, we analyse trends in retention, engagement and satisfaction to gauge the overall impact.

Building Leadership Capabilities

Through targeted learning, career development, and upskilling initiatives, we ensure our people remain agile, adaptable, and prepared for an ever-evolving landscape.

Developing Future-Ready Leaders

We introduced the People Empowered through Applied Coaching (PEAC) leadership programme to unlock leadership potential and accelerate career growth. This two-day programme equips leaders with essential skills such as active listening, effective communication and problem-solving, all of which are core components in building trust, improving team dynamics and driving growth.

As an ongoing initiative, PEAC allows employees to gain essential coaching techniques for performance appraisals, feedback delivery, and goal setting. These competencies foster a coaching culture that enhances leadership effectiveness, navigate the challenges of modern leadership in our industry and unlock new career opportunities.

Impacts:

- Empowered 57 leaders at the manager level and above.
- Strengthened leadership capabilities across the organisation and cultivated a coaching culture to improve team engagement and performance.
- Increased career mobility, enabling participants to secure leadership positions and expanded roles.

NURTURING EMPLOYEE GROWTH CAREER DEVELOPMENT

Shaping Market Leaders

We have established a Sales Conqueror programme to equip our commercial team with the skills required to lead confidently in this competitive industry. This strategic two-day training empowers participants to master speed selling, sharpen negotiation skills and adopt a proactive mindset. This will help our sales professionals develop resilience and agility to drive results and elevate sales performance.

Impacts:

- Trained 154 employees to improve sales capabilities.
- Reduced commercial team attrition rate of 3.4% in 2024, down from 6.2% in 2023.

Strengthening Operational and Digital Competencies

As technological advancements and digitalisation reshape our industry, we encourage employees to embrace lifelong learning and upskilling. This ensures they remain agile, adaptable, and prepared for an ever-evolving landscape.

Driving Operational Excellence

The Lean Six Sigma certification programme was introduced to equip employees with the expertise to lead process improvements, streamline operations and reduce inefficiencies. This globally-recognised methodology provides employees with technical knowledge and practical tools to implement data-driven solutions that enhance business processes. The certification process is ongoing and is expected to be completed by 2025.

Impacts:

- Certification in progress for 20 employees in Lean Six Sigma through nine coaching sessions.
- Fostered a culture of continuous improvement.

Addressing the Skills Gap

We conduct the Training Needs Analysis (TNA) programme to enhance technical expertise and align training initiatives with the department-specific requirements. This targeted approach allows us to identify specific skill gaps and develop customised training initiatives to address each department's unique challenges and technical demands.

Following this analysis, we will collaborate with the respective departments to understand their current challenges, technical needs and future objectives. Whether through external certifications, hands-on workshops or in-house training, we ensure employees are equipped with the tools to excel in their roles and adapt to evolving business needs.

Impacts:

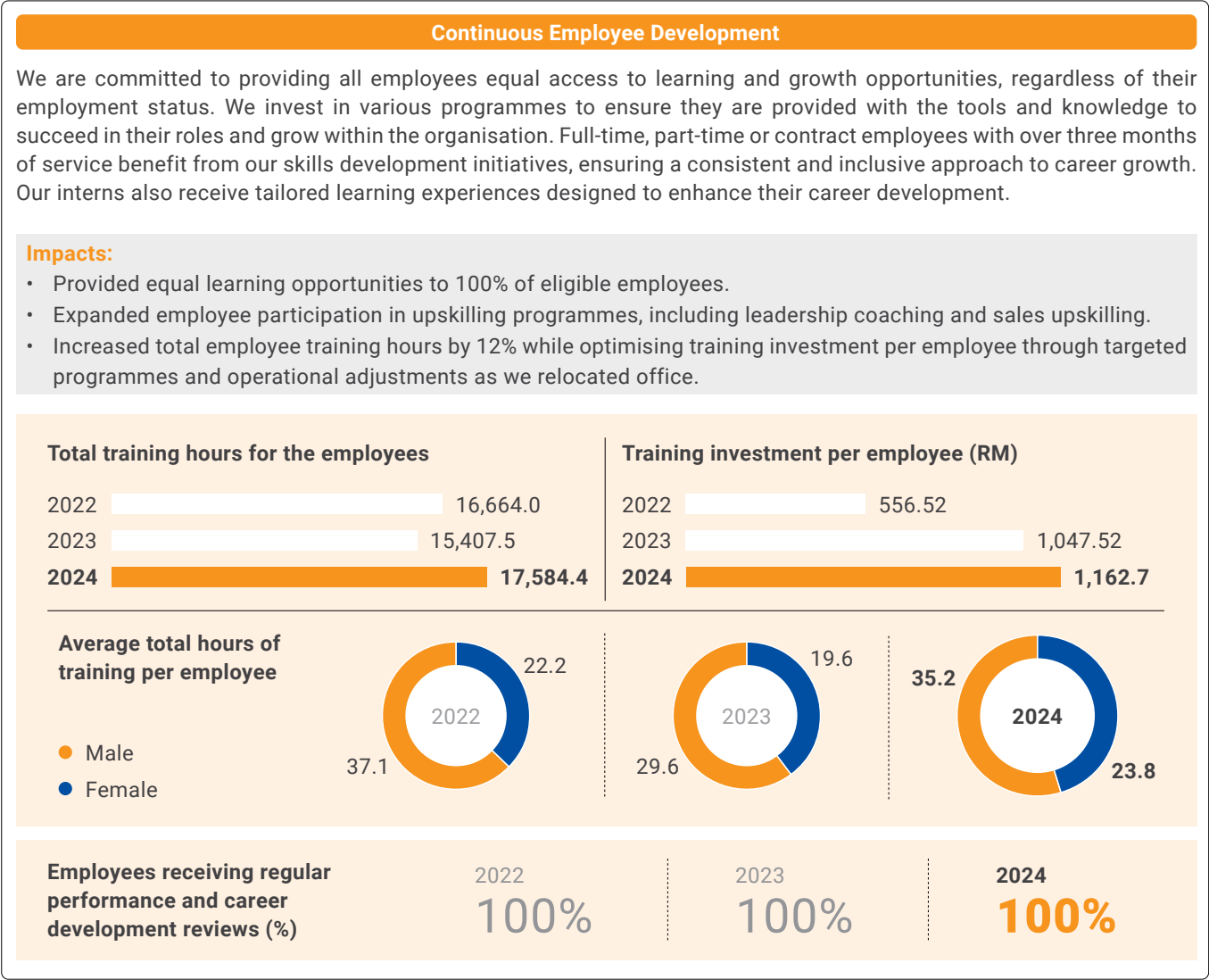
- Conducted an annual TNA to address skills gaps across all employees.
- Addressed key training needs identified by department heads, covering topics such as quality management, advanced behavioural analytics, and digital marketing.

NURTURING EMPLOYEE GROWTH

CAREER DEVELOPMENT

Fostering a Culture of Lifelong Learning

We are continuously refining our learning, career development and growth opportunities to help our employees succeed.



Our 2025 Outlook

We recognise that investing in the career development of our people is central to our success. Our approach is strategic and vital to cultivating a dynamic professional community at CTOS and across the credit reporting industry. This commitment includes substantial investments in the continuous development of our managers and leaders.

We will continue to allocate resources to comprehensive training programmes designed to enhance leadership competencies, particularly in inclusive leadership and the effective management of diverse teams. By embedding leadership development into the core of our organisational strategy, we ensure that every employee, across all levels at CTOS, contributes to a culture of continuous improvement and inclusivity, driving both personal and organisational excellence.

NURTURING EMPLOYEE GROWTH

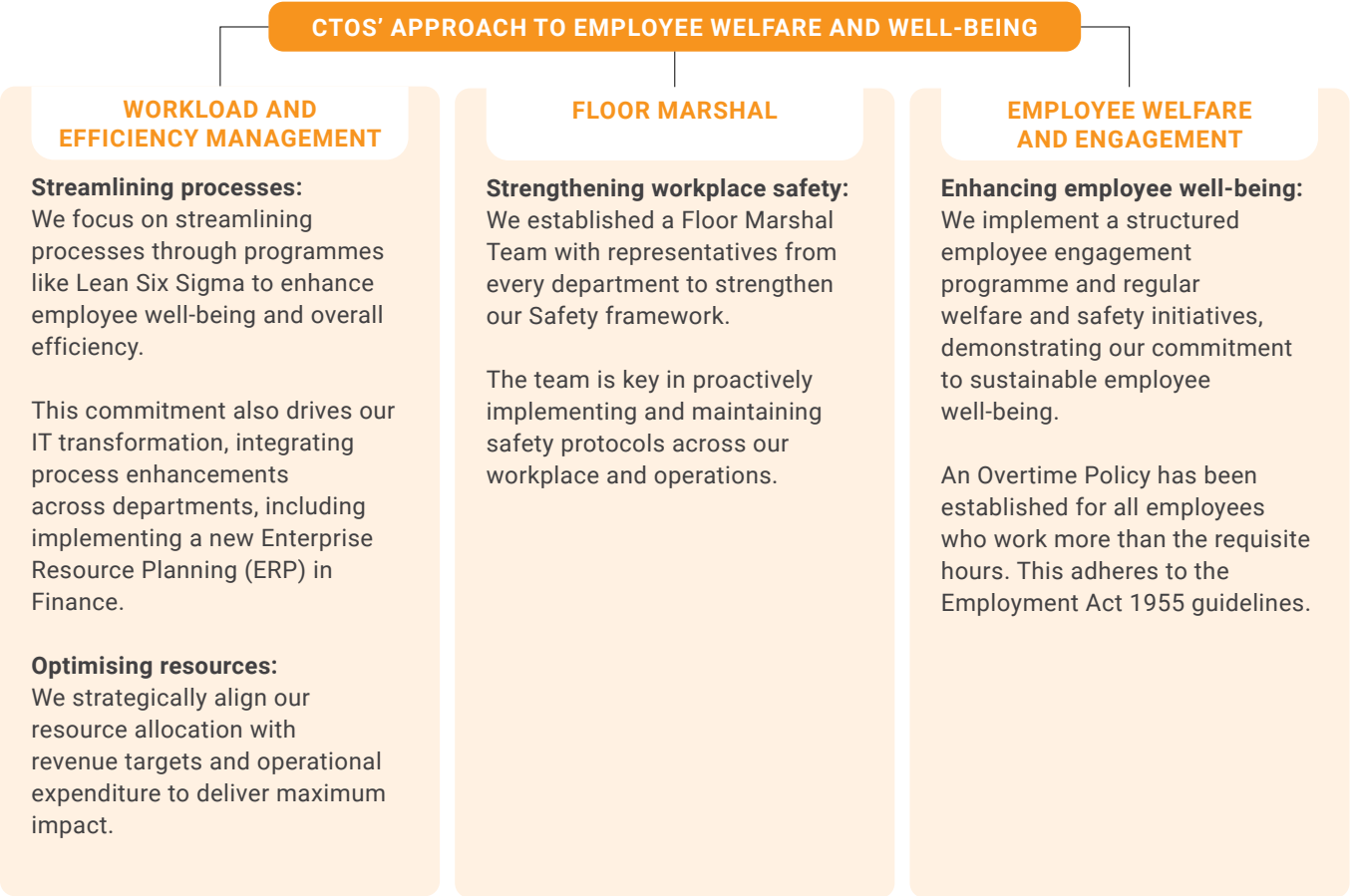
EMPLOYEE WELFARE & WELL-BEING

A strong focus on well-being cultivates engagement and a shared purpose, reinforcing our position as an employer of choice. We are committed to fostering a safe and supportive work environment that prioritises employee health, well-being, and welfare. By empowering our people to reach their full potential, we build resilience, enhance productivity and drive excellence.

Our Approach

Our management team collaborates closely with the HR team to ensure employee welfare is part of our organisational culture. This ensures our people remain engaged, motivated and well-equipped to achieve our goals. Leaders regularly meet one-on-one with team members to ensure everyone is aligned with our strategic objectives while addressing their specific needs.

Where necessary, we provide extra support and oversight to maintain performance standards. Our leadership approach emphasises empowerment as this creates a workplace where employees can excel and contribute to CTOS’ long-term growth.



Our Guiding Policies
Health & Safety Policy, Work From Home (WFH) Policy.

NURTURING EMPLOYEE GROWTH EMPLOYEE WELFARE & WELL-BEING

Enhancing Employee Experience

We have continuously enhanced employee experience by fostering a safe and healthy work environment that prioritises the well-being of our people.

Improved Workplace Environment

We have relocated to a modern office space with upgraded facilities, including enhanced dining and recreational areas to promote comfort and collaboration among our teams. This new office layout fosters an open and communicative environment, improving teamwork and employee satisfaction.



Impacts:

- Recorded 77% in our Employee Engagement Index.
- Achieved an 86% positive response in the 2024 engagement survey for the statement, "CTOS provides basic amenities to ensure comfort and safety at work," up from 72% in 2023.

Flexible Working Arrangements

We offer flexible working hours and a one-day WFH policy to improve work-life balance. This flexibility allows our employees to manage their personal and professional commitments better while ensuring they feel supported and valued.

Impact:

- Enabled the majority of employees to utilise WFH arrangements based on their roles.

Enhancing Communication Networks

In driving leadership qualities, we empower employees to take ownership of their work. Leaders are encouraged to delegate decision-making to their teams and adopt tools such as Jira and Trello for collaboration and project tracking. This helps us foster a culture of trust and transparency across the organisation.




Impact:

- Improved communication and collaboration to 76% in 2024, up from 73% in 2023, reflecting better teamwork and engagements across departments.

NURTURING EMPLOYEE GROWTH
EMPLOYEE WELFARE & WELL-BEING

Improving Process Efficiency

Managing workloads, daily tasks and switching between several systems can strain our employees’ well-being. We continuously enhance efficiency in key departments through Lean Six Sigma initiatives. These initiatives focus on streamlining workflows, eliminating bottlenecks and optimising team communication. By improving operational processes, we help our employees manage their workloads more effectively boost productivity, and manage stress.



Impacts:


- Reduced process inefficiencies and streamlined operations.
- Improved team performance and workload management.

Ensuring a Safe and Healthy Workplace

We are dedicated to strengthening our workplace safety measures and promoting holistic health initiatives that support both physical and mental well-being. Through comprehensive training programmes and awareness sessions, we drive a culture of safety, health, and wellness for our employees.

Employee Workplace Safety Readiness

Ensuring our workforce is equipped to respond to emergencies is crucial for workplace safety and resilience. To enhance emergency preparedness, we conducted cardiopulmonary resuscitation (CPR) and First Aid training in 2024, to strengthen emergency response capabilities among employees.



Impacts:

- Trained representatives in CPR and First Aid across departments.
- Increased employee confidence in handling emergencies, improving preparedness levels.
- Recorded zero incidents of work-related injuries, illnesses, or fatalities for three consecutive years.

	2022	2023	2024
Number of training programmes for workers on occupational health and safety	1	2	2
Number of employees trained on health and safety standards	21	351*	23
Number of workers covered by an occupational health and safety management system (%)	100%	100%	100%

* We provided a compulsory health and safety programme as part of our Business Continuity Plan (BCP).

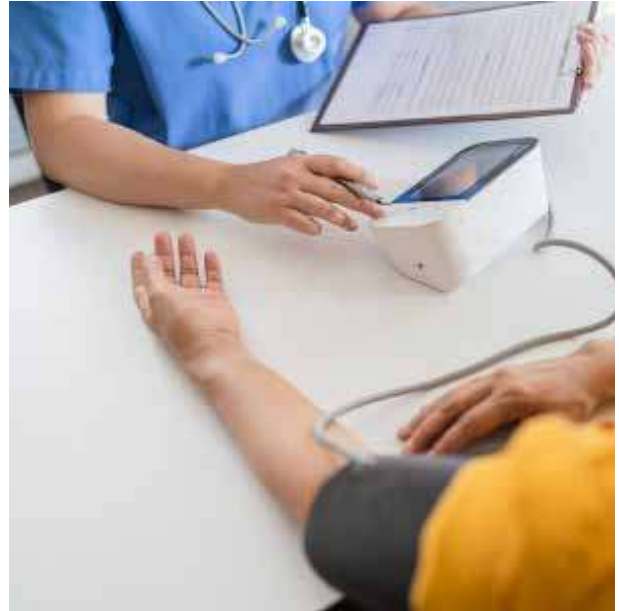
NURTURING EMPLOYEE GROWTH

EMPLOYEE WELFARE & WELL-BEING

Health and Wellness Initiatives

We prioritise employee health and wellness by offering a range of wellness programmes, which also include regular health check programmes and fitness challenges. In 2024, we enhanced our medical benefits, providing employees with access to quality healthcare services. This demonstrated our deep commitment to improving their physical and mental well-being.

Additionally, we organised annual health screenings, influenza vaccinations, and health talks on stress management and healthy eating. Wellness activities such as step challenges and participation in the KL Car-Free Day were also introduced to promote an active lifestyle.



Impacts:

- Increased employee participation in wellness programmes.
- Improved healthcare access and well-being support, with more employees reporting better access to services.

Rewarding Our People

We believe that well-structured benefits and a compensation framework is essential to create a supportive and motivated workforce. At CTOS, fair and competitive remuneration, along with meaningful benefits play a key role in our employees' well-being, job satisfaction, and overall engagement.

To ensure competitive and fair compensation, we participated in the Willis Towers Watson (WTW) Salary Survey 2024. This global benchmarking exercise gathers insights on salary trends, pay structures, and industry standards. Thus, enabling us to make informed adjustments to our future salary framework and remain competitive in talent retention.

Our 2025 Outlook

We strive to cultivate a workplace culture that prioritises healthy lifestyles and effective stress management. To support this, we plan to introduce wellness initiatives such as fitness challenges, mindfulness sessions, and mental health programmes, including stress management and resilience workshops. By fostering an environment that encourages healthy habits and work-life balance, we enhance employee well-being, strengthen resilience and drive organisational productivity.

ACTING WITH INTEGRITY

- Governance, Transparency, & Accountability
- Sustainability Risk Management



ACTING WITH INTEGRITY

GOVERNANCE, TRANSPARENCY, & ACCOUNTABILITY

Trust forms the foundation of the credit reporting ecosystem, requiring strict compliance, integrity, and ethical business practices. At CTOS, we embed governance, transparency, and accountability into our operations to mitigate financial and legal risks while maintaining stakeholder confidence. We ensure clear communication of our strategies, outcomes, and the effectiveness of our initiatives, reinforcing trust in our business.

Our Approach

Driving Sustainability and Accountability

Sustainability is central to CTOS’ long-term growth and credibility. A structured governance framework underpins these efforts, aligning with stakeholder expectations and driving meaningful impact.

The Board of Directors, as the highest governing body, safeguards CTOS’ financial health and organisational integrity while enhancing shareholder value and protecting stakeholder interests. We maintain robust oversight through close collaboration between Management, the Audit and Risk Committee (ARC), and the Board, ensuring:

Quarterly reviews of financial and regulatory matters.

Regular internal audits to strengthen internal controls and enable prompt corrective actions.

The Board and leadership team oversee sustainability initiatives, conducting annual reviews of sustainability plans with quarterly updates to Management and ARC. For urgent matters, a transparent escalation process allows Management to address critical issues through ad-hoc reviews before escalating them for ARC discussions.

CTOS communicates its sustainability strategies, priorities, and progress clearly through established reporting channels, including the Annual and Sustainability Reports.

ROLES	RESPONSIBILITY
Board	<ul style="list-style-type: none">Integrates ESG considerations into strategy and decision-making.Approves the sustainability blueprint and roadmap.
Audit Risk Committee (ARC)	<ul style="list-style-type: none">Reviews and recommends sustainability action plans for Board approval.Oversees execution of the sustainability framework, ensuring alignment with strategic goals.Facilitates discussions on sustainability progress and key developments.Receives quarterly updates from the Group to track and refine initiatives.
Group CEO	<ul style="list-style-type: none">Approves key sustainability decisions and initiatives.Leads execution of sustainability strategies endorsed by the Board.Engages with stakeholders to understand expectations, concerns, and opportunities.Conducts monthly reviews with the Group Head of Corporate Strategy and Planning to track progress.
Group Head of Corporate Strategy and Planning	<ul style="list-style-type: none">Develops and proposes CTOS’ sustainability strategy to the Group CEO and ARC.Implements and integrates sustainability plans across business and operational departments, focusing on key ESG priorities.
Senior Management (C-Level Team) and Head of Departments	<ul style="list-style-type: none">Implements sustainability initiatives and report progress to the Group Head of Corporate Strategy and Planning.

ACTING WITH INTEGRITY

GOVERNANCE, TRANSPARENCY, & ACCOUNTABILITY

Policies and Frameworks

Across the Group, we comply with the following codes and policies:

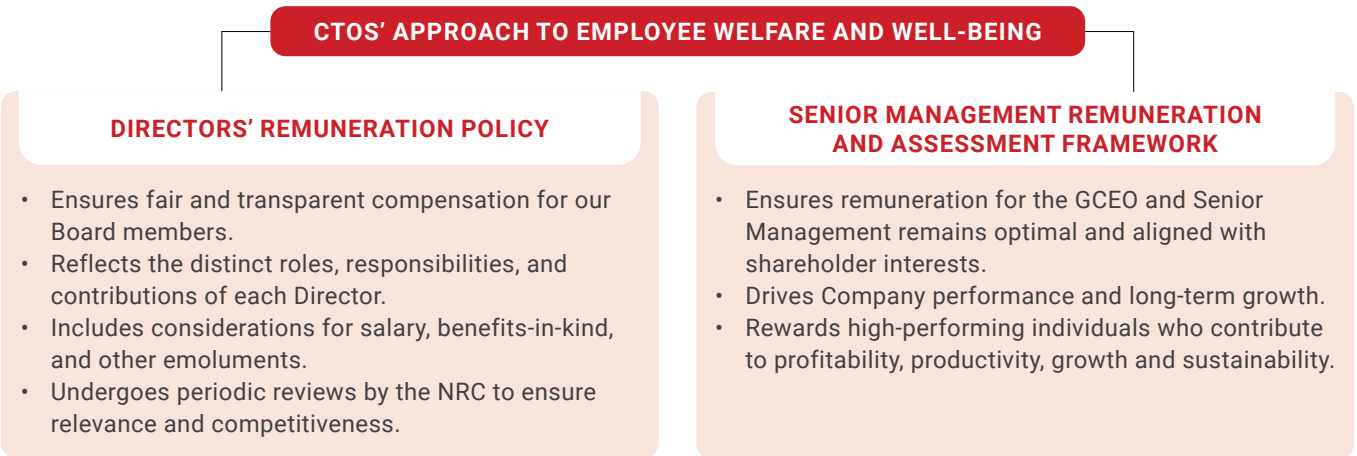
CTOS DIGITAL CORPORATE GOVERNANCE CODE AND POLICIES



All policy changes recommended by the Nomination and Remuneration Committee (NRC) are submitted for Board review and approval.

Fair and Performance-driven Remuneration

To ensure fair and competitive compensation, we have implemented the Directors' Remuneration Policy and the Senior Management Remuneration and Assessment Framework. This approach strengthens CTOS' leadership pipeline by attracting and retaining qualified talent for key leadership positions, ensuring long-term business sustainability and strategic growth.



Following the remuneration guidelines, we conduct structured assessments to evaluate leadership, decision-making efficiency, and each Director's role in overseeing sustainability efforts, defining strategies, and driving long-term value.

ACTING WITH INTEGRITY
GOVERNANCE, TRANSPARENCY, & ACCOUNTABILITY

Strengthening Integrity and Anti-Corruption Measures

Upholding the highest ethical standards protects data security, ensures regulatory compliance, and safeguards stakeholder confidence. Thus, we reinforce our zero-tolerance approach to corruption by strengthening anti-bribery measures, enhancing awareness, and fostering a culture of accountability.

Anti-Corruption Awareness and Training

Integrity is key to maintaining trust in our business. In December 2024, we conducted a mandatory online ABAC refresher programme. This initiative continues to reinforce compliance by strengthening ABAC awareness enhancing risk mitigation strategies, and fostering an ethical business culture through targeted training sessions.

Impacts:

- **100%** employees participated in anti-corruption briefings on policies and procedures.
- **100%** employees attended anti-corruption training sessions.
- **100%** senior management and directors attended anti-corruption briefing on policies and procedures.
- **Zero** corruption incidences were reported within CTOS.

Enhancing Compliance and Risk Oversight

Robust compliance and risk management are critical to CTOS’ ability to provide trusted credit reporting services.

Improving Risk Surveillance and Controls

We proactively assess and mitigate risks through comprehensive evaluations of our operations, ensuring compliance with all applicable laws, regulations, and ethical standards. Strengthening internal controls allows us to identify and address potential risks effectively.

Impacts:

- **Zero** penalty, private or public reprimand by regulators.
- **Zero** investigations conducted.
- **Zero** regulatory non-compliances.

Sustained Compliance Excellence

As a licensed credit reporting agency, strict compliance is essential to ensuring uninterrupted operations and continued access to key financial ecosystems.

Impacts:

- Passed the annual audit for the Credit Reporting Agencies (CRA) license renewal.
- Secured a satisfactory result in the annual audit by an independent auditor to ensure continuous access to CCRIS data sourced from BNM.

Our 2025 Outlook

In 2025, we will strengthen regulatory compliance through rigorous enforcement measures and targeted awareness initiatives across all operations. Our focus remains on exceeding regulatory standards, enhancing risk management, and maintaining full transparency with stakeholders. By continuously refining our governance framework, we aim to reinforce CTOS’ position as a trusted, responsible leader in the credit reporting industry.

ACTING WITH INTEGRITY

SUSTAINABILITY RISK MANAGEMENT

CTOS operates in a rapidly evolving landscape shaped by cybersecurity threats, stringent ESG regulations, and ethical credit reporting obligations. In an industry built on trust, effective sustainability risk management is essential to safeguarding our business integrity.

Failure to manage these risks could lead to data breaches, regulatory penalties, legal liabilities, and reputational damage—undermining our role as a trusted partner to financial institutions, businesses, and consumers.

Our Approach

We systematically assess and manage sustainability risks by integrating ESG factors into our business strategy, with a strong focus on regulatory compliance, ethical data governance, and climate-related risks.

Governance Oversight and Operational Integration

The Board also conducts regular assessments to identify and evaluate sustainability risks and opportunities, including a materiality assessment exercise that undergoes annual review and enhancement. This assessment considers both the Company’s direct and indirect impacts on the environment and society. Through these reviews, we formalise mitigating actions that are to be implemented within appropriate timeframes. RCC, entrusted by the Board, plays a pivotal role in overseeing risk management and establishing the internal control systems and processes within the Group.

This collaborative approach ensures a comprehensive evaluation of material matters, allowing for timely identification and mitigation of risks. Additionally, the Board has established material sustainability risks and opportunities for Senior Management as assessment criteria within their KPIs. This includes the execution of the Company’s strategies through efficient and effective implementation, as well as the achievement of pre-set performance objectives based on qualitative and quantitative measures.

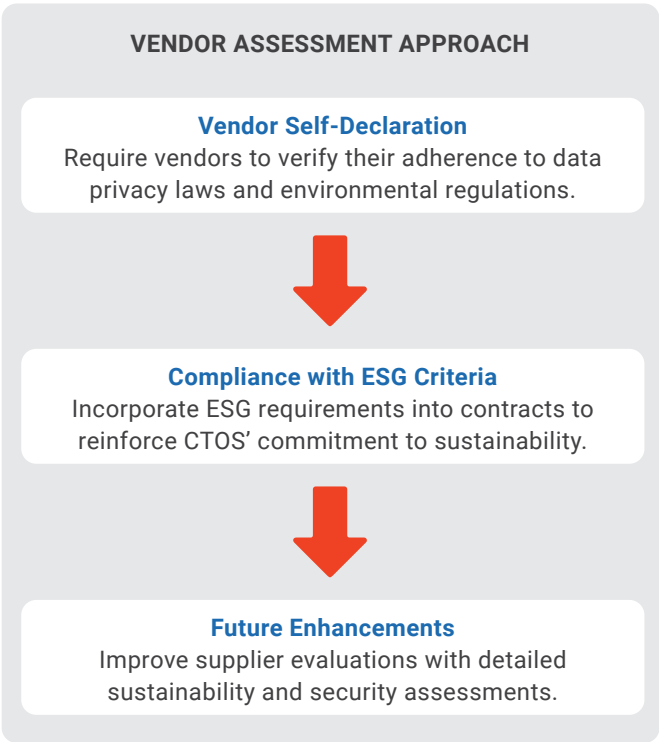
Enterprise Risk Management (ERM) Framework

To manage Economic, Environmental, Social, and Governance (EESG) risks across our operations, we established the CTOS ERM Framework. Within the ERM Framework, we establish the Company’s risk appetite which reflects our level of risk tolerance and limits to govern, manage and control the Group’s risk-taking activities. This, in turn, will be integrated into our strategic planning process of the Company. Our risk management process is also guided by ISO 31000 Risk Management Guidelines.

Third-Party Due Diligence

Sustainability risks extend beyond our own operations, making responsible procurement a key priority. To strengthen ESG oversight, we require suppliers to submit self-declarations confirming their adherence to ESG principles, ensuring alignment with fair labour practices, environmental regulations, and responsible data management as outlined in our Vendor Code of Conduct (VCOC).

This due diligence process acts as a critical first line of defence, enabling us to proactively assess supply chain risks and uphold the highest standards of business ethics and corporate responsibility.



ACTING WITH INTEGRITY

SUSTAINABILITY RISK MANAGEMENT

Building Risk Resilience and Business Continuity

We have taken strategic steps to reinforce our risk management framework, enhance crisis preparedness and embed a risk-aware culture across all levels. These initiatives strengthen governance, improve response capabilities, and ensure business continuity in an increasingly complex environment.

Risk Management Policies and Frameworks

To enhance governance and resilience, we have strengthened our risk management policies and frameworks to align with evolving regulatory requirements and global best practices. These enhancements, endorsed by the Board, ensure that risk management remains a cornerstone of our strategic decision-making.

Additionally, we have prioritised risk assessment exercises for all key projects beyond the standard half-yearly risk assessments, allowing for proactive identification and mitigation of potential risks.

Impacts:

- Increased regulatory compliance.
- Improved risk detection in high-impact projects.

Business Continuity and Crisis Preparedness

The Board approved a Group-wide Business Continuity Management Framework, ensuring operational stability during disruptions. This year, we implemented tailored BCPs for key subsidiaries and conducted a cyber-incident tabletop exercise to improve response readiness. Following this initiative, a Crisis Management Framework was also established to streamline decision-making during emergencies.



Impact:

- Reduced operational downtime and faster crisis response.

Groupwide Risk-Aware Culture

Fostering a culture of sustainability risk awareness is essential to strengthening compliance and operational resilience. In 2024, we introduced continuous risk education initiatives, including regular risk-focused communication to all employees. This ensures ongoing awareness and promotes proactive risk management behaviours.

Impacts:

- Higher employee engagement in risk management.
- Improved risk ownership and decision-making skills.

ACTING WITH INTEGRITY SUSTAINABILITY RISK MANAGEMENT

Strengthening Procurement Practices

Beyond our employees, we are also working towards building a culture of compliance among our vendors to ensure data security, regulatory adherence, and ethical business practices across our supply chain.

Cross-Departmental Awareness on Sustainable Procurement

We conducted a series of awareness sessions across departments to deepen employees' understanding of procurement sustainability objectives and enhance cross-functional collaboration. These sessions provided a platform to address concerns, clarify procurement processes, and reinforce the role of sustainable sourcing in supporting CTOS' broader ESG commitments.



Impacts:

- Conducted 12 awareness sessions, engaging 91 internal stakeholders across multiple departments.
- Strengthened cross-functional collaboration to support sustainable, transparent procurement practices.
- Improved understanding of compliance requirements, ethical sourcing, and risk management within the organisation.

Procurement Policy and Vendor Assessment Enhancements

To drive greater compliance within our supply chain, we introduced an enhanced procurement policy with a structured vendor assessment process. All suppliers are required to complete a Vendor Registration Form and VCOC adherence. This ensures compliance with key areas such as anti-bribery and corruption measures, interactions with public officials, adherence to labour and environmental laws, and data privacy protections.

Impacts:

- Improved vendor compliance by requiring self-declarations of adherence to the Personal Data Protection Act (PDPA), anti-bribery regulations, and other critical standards.
- Mandated disclosure of subcontractor usage and prior legal violations to improve visibility into potential third-party risks.
- Reinforced ethical business practices, environmental responsibility, and fair labour through the VCOC to mitigate operational and reputational risks.

Our 2025 Outlook

Moving forward, our sustainable risk management will require a proactive approach to navigating stricter regulations, assessing the environmental impact of emerging technologies, and addressing climate-related financial risks by aligning with IFRS S2. Thus, we will leverage advanced ESG risk assessment tools and align with investor expectations for sustainability. Staying ahead of these trends is crucial to building long-term resilience and maintaining a competitive edge.

We will continue to strengthen our sustainable procurement system by enhancing vendor evaluations, reinforcing ethical standards, and integrating sustainability into our supply chain. Key initiatives include enhanced ESG assessments, continuous vendor performance monitoring, capacity-building programmes, risk-based audits, and the implementation of e-procurement solutions. These efforts will pave the way for more comprehensive sustainability assessments, including potential third-party audits.

APPENDIX

Sustainability Performance Data

INNOVATIVE CUSTOMER SOLUTIONS			
Disclosures	2022	2023	2024
Product and Services			
Number of self-check users (million)	2.47	3.64	4.4
Average Credit Score	678	684	597
Average monthly visitors to Knowledge Base Website (million)	1.45	2.11	2.6
Customer Experience			
Total number of customers (Key accounts and commercial customers only)	21,000	22,000	22,500
Number of customer complaints received and resolved	269	225	350
Number of customer complaints received	269	225	354
Number of customer complaints resolved	269	225	350
Quality Score	93.77	92.67	93.51
Net Promoter Score (NPS)	+4.8	+14.4	+23.1
Number of customer service training conducted	4,325	4,373	4,528
DATA PRIVACY AND CYBERSECURITY			
Number of cybersecurity incidents reported		0	0
Number of cybersecurity incidents resolved/handled	0	0	0
Number of data-related incidents	0	0	0
Number of training and awareness on cybersecurity	2	8	14
Number of substantiated complaints breaches of customer privacy and losses of customer data*	0	0	1
FINANCIAL INCLUSION AND COMMUNITY EMPOWERMENT			
Total amount invested in the community where the target beneficiaries are external to the listed issuer (RM)	19,390	219,588	307,489
Number of beneficiaries of the investment in communities	1	1	1
Quantifiable output/outcome of specific results, achievements or benefits of community investments	30,000	25,000	16,000
GHG EMISSIONS AND ENERGY CONSUMPTION			
Direct (Scope 1) GHG Emissions (tCO ₂ e)	0.82	0.65	0
Indirect (Scope 2) GHG Emissions (tCO ₂ e)	407.57	371.03	301.25
Indirect (Scope 2) GHG Emissions Intensity (tCO ₂ e/FTE)**	0.78	0.64	0.49
Reduction of GHG Emissions (%)	NA	9	26
Energy			
Energy consumption within the organisation (MWh)	696.70	634.24	514.96
Energy intensity (MWh/FTE)**	1.34	1.09	0.84
Reduction of energy consumption (%)	NA	9	26
ENVIRONMENTAL STEWARDSHIP			
Water			
Water consumption (Megalitres)***	32.89	37.50	5.36

* In FY2024, we recorded one substantiated complaint concerning a breach of customer privacy. The issue was promptly addressed through internal investigation and corrective measures. We continue to enhance our data protection infrastructure and governance processes to prevent recurrence and ensure customer trust.

** FTE includes full-time and temporary employees.

*** The 2022 and 2023 figures are calculated using 2019 tariff by Syarikat Bekalan Air Selangor (SYABAS) while the 2024 figure is calculated using the latest tariff rate provided by Suruhanjaya Perkhidmatan Air Negara (SPAN).

APPENDIX

Sustainability Performance Data

EMPLOYEE WELFARE AND WELL-BEING			
Disclosures	2022	2023	2024
Number of training programmes for workers on occupational health and safety	1	2	2
Number of employees trained on health and safety standards	21	351	23
Number of workers covered by an occupational health and safety management system (%)	100	100	100
Number of work-related injuries	0	0	0
Number of work-related ill health	0	0	0
Number of work-related fatalities	0	0	0
Lost time incident rate	0	0	0
Number of substantiated complaints concerning human rights violations	0	0	0
Employees taking parental leave (Number of employees)	24	36	34
CAREER DEVELOPMENT			
Average training days per employee	3.54	3.04	3.60
Training investment per employee (RM)	556.52	1,047.52	1,162.7
Total training hours for the employees	16,664	15,407.5	17,584.4
Average total hours of training per employee (person hours)	28.3	24.3	28.8
Average Total Hours of Training per Employee by Gender			
Female	22.2	19.6	23.8
Male	37.1	29.6	35.2
Average Total Hours of Training per Employee by Job Level			
Non-Executive	11.8	9.4	2
Executive	38.6	25.6	32.3
Middle Manager	16.9	33	40
Senior Management	10.8	21.2	11.1
Number of employee upskilling programmes	9	10	10
Employees receiving regular performance and career development reviews (%)	100	100	100
Number of discrimination incidents	0	0	0
Number of corrective actions regarding discrimination incidents taken	0	0	0
Ratio of basic salary and remuneration (male to female)	1.4:1	1.7:1	1.6:1
DIVERSITY, EQUITY AND INCLUSION (DEI)			
Breakdown of Employees by Gender (Number & %)			
Female	339 (59%)	301 (53%)	344 (56%)
Male	238 (41%)	268 (47%)	267 (44%)
Senior Management			
Female	27%	23%	29%
Male	73%	77%	71%
Middle Management			
Female	47%	45%	48%
Male	53%	55%	52%

APPENDIX

Sustainability Performance Data

DIVERSITY, EQUITY AND INCLUSION (DEI)			
Disclosures	2022	2023	2024
Executive			
Female	52%	51%	56%
Male	48%	49%	44%
Non-Executive			
Female	92%	75%	76%
Male	8%	25%	24%
Breakdown of Employees by Age Group (%)			
Senior Management			
<30	0%	0%	0%
30-50	73%	73%	76%
>50	27%	27%	24%
Middle Management			
<30	9.40%	7%	5%
30-50	89.40%	89%	90%
>50	1.20%	4%	5%
Executive			
<30	45.50%	46%	47%
30-50	53.90%	53%	52%
>50	0.60%	1%	1%
Non-Executive			
<30	68.80%	61%	62%
30-50	30.40%	39%	38%
>50	0.80%	0%	0%
Breakdown of Employees by Employment Type (Number & %)			
Full-Time	509 (88%)	521 (92%)	559 (91.5%)
Temporary	68 (12%)	48 (8%)	52 (8.5%)
Category of Employees (%)			
Malaysian	97%	98%	97%
Non-Malaysian	3%	2%	3%
Senior Management Employees (Number & %)			
Female	6 (27%)	5 (23%)	6 (29%)
Male	16 (73%)	17 (77%)	15 (71%)
Senior Leadership Team (SLT) Employees (Number & %)			
Female	4 (24%)	4 (25%)	5 (36%)
Male	13 (76%)	12 (75%)	9 (64%)
Board of Directors Employees (Number & %)			
By Gender			
Female	3 (43%)	3 (50%)	3 (50%)
Male	4 (57%)	3 (50%)	3 (50%)
Independent Directors	5 (71%)	4 (67%)	4 (67%)

APPENDIX

Sustainability Performance Data

DIVERSITY, EQUITY AND INCLUSION (DEI)			
Disclosures	2022	2023	2024
By Age Group			
<30	0%	0%	0%
30-50	0%	0%	0%
>50	100%	100%	100%
Employees with disabilities (%)	0	0	0
Number of Senior Management are Local Communities	16	15	15
Female in Technical Position (%)	34%	28%	28%
Total Number of New Hires by Job Level (%)			
Non-Executive	69 (29%)	42 (23%)	41 (20%)
Executive	142 (61%)	122 (66%)	126 (61%)
Middle Manager	19 (8%)	16 (9%)	37 (18%)
Senior Management	5 (2%)	3 (2%)	4 (2%)
Average Employee Turnover Rate (%)			
Female	1.3	1	0.9
Male	1.9	1.1	1.1
Average Turnover Rate by Job Level (%)			
Non-Executive	0.20	0.10	0.05
Executive	2.80	1.90	1.62
Middle Manager	0.30	0.10	0.29
Senior Management	0.01	0.02	0.05
Employee Attrition Rate (%)	3.2	2.1	2.01
GOVERNANCE, TRANSPARENCY AND ACCOUNTABILITY			
Anti-Corruption			
Percentage of operations assessed for corruption-related risks (%)	75	75	100
Number of confirmed incidents of corruption and action taken	0	0	0
Number of confirmed cases where employees were dismissed/ disciplined for corruption	0	0	0
Number of confirmed cases where business partners/suppliers were terminated due to violations related to corruption	0	0	0
Number and percentage of employees participated in anti-corruption briefing/policies and procedures	577 (100%)	569 (100%)	611 (100%)
Number and percentage of employees received training in anti-corruption briefing/policies and procedures by employee category			
Non-Executive	125 (21.7%)	92 (16.1%)	88 (14.4%)
Executive	345 (59.8%)	355 (62.4%)	380 (62.2%)
Middle Manager	85 (14.7%)	100 (17.6%)	122 (20%)
Senior Management	22 (3.8%)	22 (3.9%)	21 (3.4%)
Anti-Competitive Behaviour			
Number of legal actions pending/completed regarding anti- competitive behaviour and violations of anti-trust and monopoly	0	0	0

APPENDIX

Sustainability Performance Data

GOVERNANCE, TRANSPARENCY AND ACCOUNTABILITY			
Disclosures	2022	2023	2024
Compliances			
Number of misconduct/malpractice reports received	0	0	1
Number of investigations conducted	0	0	1
% of compliances to operating laws & regulations	100	100	100
Penalty, private or public reprimand by Regulators	0	0	0
Regulatory non-compliances	0	0	0
Audit			
Annual audit by the Registrar Office of the Credit Reporting Agencies for CRA license renewal	Pass	Pass	Pass
Annual audit by an independent auditor for continuous access to BNM	Satisfactory	Satisfactory	Satisfactory
SUSTAINABILITY RISK MANAGEMENT			
Monetary contribution to suppliers (RM)			
Local Suppliers	Disclosure starts in FY2024		23,412,043
International Suppliers			4,507,455
Total Suppliers			27,919,498
Proportion of spending on local suppliers (%)	90%	90%	83.9%

GRI Content Index

The CTOS Digital Integrated Report and Sustainability Report were prepared in reference to GRI Standards 2021.

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
GRI 2: General Disclosures 2021	2-1 Organizational details	Integrated Report: Overview of CTOS, page 4-8
	2-2 Entities included in the organization's sustainability reporting	Integrated Report: About this Report, page 2-3
	2-3 Reporting period, frequency and contact point	Integrated Report: About this Report, page 2-3 Sustainability Report: About this Report, page 1
	2-5 External assurance	Integrated Report: About this Report, page 2-3
	2-6 Activities, value chain and other business relationships	Integrated Report: Overview of CTOS, page 4-8
	2-7 Employees	Sustainability Report: Diversity, Equity, and Inclusion (DEI), page 42-45
	2-8 Workers who are not employees	Sustainability Report: Diversity, Equity, and Inclusion (DEI), page 42-45
	2-9 Governance structure and composition	Integrated Report: Sustainability Statement, page 48-53 Sustainability Report: Governance, Transparency and Accountability, page 54-56
	2-10 Nomination and selection of the highest governance body	Directors' Qualification, Fit and Proper Policy, https://ctosdigital.com/corporate-governance/fit-and-proper-policy/
	2-11 Chair of the highest governance body	Integrated Report: Corporate Information, page 56 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/
	2-12 Role of the highest governance body in overseeing the management of impacts	Integrated Report: Corporate Governance Overview Statement, page 64-67 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/
	2-13 Delegation of responsibility for managing impacts	Integrated Report: Corporate Governance Overview Statement, page 66-68 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/
	2-14 Role of the highest governance body in sustainability reporting	Sustainability Report: Governance, Transparency, and Accountability, page 54-56 Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/

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GRI Content Index

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
	2-15 Conflicts of interest	Board Charter and Terms Of Reference, https://ctosdigital.com/corporate-governance/board-charter/ Integrated report: Board of Directors, page 57-60
	2-16 Communication of critical concerns	Sustainability Report: Governance, Transparency and Accountability, page 54-56
	2-17 Collective knowledge of the highest governance body	Integrated Report: Corporate Governance Overview Statement, page 76-78
	2-18 Evaluation of the performance of the highest governance body	Integrated Report: Corporate Governance Overview Statement, page 75
	2-19 Remuneration policies	Directors' Remuneration Policy, https://ctosdigital.com/corporate-governance/directors-remuneration-policy/
	2-20 Process to determine remuneration	Directors' Remuneration Policy, https://ctosdigital.com/corporate-governance/directors-remuneration-policy/
	2-21 Annual total compensation ratio	Integrated Report: Notes to the Financial Statements, page 133
	2-22 Statement on sustainable development strategy	Sustainability Report: Our Sustainability Approach, page 17-18
	2-23 Policy commitments	Code Of Business Conduct and Ethics, https://ctosdigital.com/corporate-governance/code-of-business-conduct-ethics/
	2-24 Embedding policy commitments	Integrated Report: Sustainability Statement page 48-53
	2-25 Processes to remediate negative impacts	Whistleblowing Policy, https://ctosdigital.com/wp-content/uploads/2023/06/Whistleblowing-Policy.pdf Code Of Business Conduct and Ethics, https://ctosdigital.com/corporate-governance/code-of-business-conduct-ethics/
	2-26 Mechanisms for seeking advice and raising concerns	Whistleblowing Policy, https://ctosdigital.com/wp-content/uploads/2023/06/Whistleblowing-Policy.pdf Code Of Business Conduct and Ethics, https://ctosdigital.com/corporate-governance/code-of-business-conduct-ethics/
	2-27 Compliance with laws and regulations	Sustainability Report: Governance, Transparency, and Accountability, page 54-56
	2-28 Membership associations	Sustainability Report: Our Sustainability Approach, page 17-18
	2-29 Approach to stakeholder engagement	Integrated Report: Stakeholder Engagement, page 16-21 Sustainability Report: Stakeholder Engagement, page 10
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Integrated Report: Material Matters, page 22-26
	3-2 List of material topics	Sustainability Report: Material Matters, page 13-16

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GRI Content Index

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
DATA PRIVACY & CYBER SECURITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Data Privacy and Cybersecurity, page 23-26
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Sustainability Report: Data Privacy and Cybersecurity, page 23-26
GOVERNANCE, TRANSPARENCY, & ACCOUNTABILITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Governance, Transparency, & Accountability, page 54-56
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Integrated Report: Bursa Malaysia ESG Performance Report, page 54
	205-2 Communication and training about anti-corruption policies and procedures	Anti-Bribery and Anti-Corruption (ABAC) Policy, https://ctosdigital.com/corporate-governance/anti-bribery-and-corruption-policy/
	205-3 Confirmed incidents of corruption and actions taken	Integrated Report: Bursa Malaysia ESG Performance Report, page 54
GRI 207: Tax 2019	207-1 Approach to tax	Integrated Report: Notes to the Financial Statements, page 131
	207-2 Tax governance, control, and risk management	Integrated Report: Notes to the Financial Statements, page 131
SUSTAINABILITY RISK MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Sustainability Risk Management, page 57-59
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Integrated Report: Bursa Malaysia ESG Performance Report, page 54
INNOVATIVE CUSTOMER SOLUTIONS		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Innovative Customer Solutions, page 27-30
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Integrated Report: Group Chief Executive Officer's Message, page 28-32
	201-3 Defined benefit plan obligations and other retirement plans	Integrated Report: Notes to the Financial Statements, page 132
FINANCIAL INCLUSION AND COMMUNITY EMPOWERMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Financial Inclusion and Community Empowerment, page 31-35
GRI 203: Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	Sustainability Report: Financial Inclusion and Community Empowerment, page 31-35
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Sustainability Report: Financial Inclusion and Community Empowerment, page 31-35

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GRI Content Index

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
DIVERSITY, EQUITY, & INCLUSION		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Diversity, Equity, and Inclusion, page 42-45
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	Sustainability Report: Diversity, Equity, and Inclusion, page 42-45
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Sustainability Report: Diversity, Equity, and Inclusion, page 42-45
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Sustainability Report: Diversity, Equity, and Inclusion, page 42-45
		Integrated Report: Board of Directors and Key Senior Management, page 57-63
	405-2 Ratio of basic salary and remuneration of women to men	Sustainability Report: Diversity, Equity, and Inclusion, page 42-45
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Sustainability Report: Diversity, Equity, and Inclusion, page 42-45
CAREER DEVELOPMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Career Development, page 46-48
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Sustainability Report: Career Development, page 46-48
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Sustainability Report: Career Development, page 46-48
	404-2 Programs for upgrading employee skills and transition assistance programs	Sustainability Report: Career Development, page 46-48
	404-3 Percentage of employees receiving regular performance and career development reviews	Sustainability Report: Career Development, page 46-48
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Employee Welfare and Well-Being, page 49-52
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Sustainability Report: Employee Welfare and Well-Being, page 49-52
GRI 401: Employment 2016	401-3 Parental leave	Sustainability Report: Employee Welfare & Well-Being, page 49-52

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GRI Content Index

GRI STANDARD	DISCLOSURE	REFERENCE/ SOURCE
EMPLOYEE WELFARE & WELL-BEING		
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Sustainability Report: Employee Welfare & Well-Being, page 49-52
	403-3 Occupational health services	Sustainability Report: Employee Welfare & Well-Being, page 49-52
	403-5 Worker training on occupational health and safety	Sustainability Report: Employee Welfare & Well-Being, page 49-52
	403-6 Promotion of worker health	Sustainability Report: Employee Welfare & Well-Being, page 49-52
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Sustainability Report: Employee Welfare & Well-Being, page 49-52
	403-8 Workers covered by an occupational health and safety management system	Sustainability Report: Employee Welfare & Well-Being, page 49-52
	403-9 Work-related injuries	Sustainability Report: Employee Welfare & Well-Being, page 49-52
	403-10 Work-related ill health	Sustainability Report: Employee Welfare & Well-Being, page 49-52
GHG EMISSIONS & ENERGY CONSUMPTION		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: GHG Emissions and Energy Consumption, page 37-39
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Sustainability Report: GHG Emissions and Energy Consumption, page 37-39
	302-3 Energy intensity	Sustainability Report: GHG Emissions and Energy Consumption, page 37-39
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Sustainability Report: GHG Emissions and Energy Consumption, page 37-39
	305-2 Energy indirect (Scope 2) GHG emissions	Sustainability Report: GHG Emissions and Energy Consumption, page 37-39
	305-4 GHG emissions intensity	Sustainability Report: GHG Emissions and Energy Consumption, page 37-39
	305-5 Reduction of GHG emissions	Sustainability Report: GHG Emissions and Energy Consumption, page 37-39
ENVIRONMENTAL STEWARDSHIP		
GRI 3: Material Topics 2021	3-3 Management of material topics	Sustainability Report: Environmental Stewardship, page 40
GRI 303: Water and Effluents 2018	303-5 Water consumption	Integrated Report: Bursa Malaysia ESG Performance Report, page 54

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GHG Emissions Methodology

Reporting Scopes	
Organisational Boundary	<p>CTOS adopts the operational control approach to consolidate and report its GHG emissions. Under this approach, CTOS accounts for 100% of emissions from operations where it has full authority to introduce and implement operating policies. This includes all entities over which CTOS Digital Berhad and its subsidiaries exercise operational control.</p> <p>For the full list of the Group’s operations, please refer to page 6 of the Integrated Report.</p>
Operational Boundary	<p>CTOS is reporting its Scope 1 and Scope 2 Emissions.</p> <ul style="list-style-type: none">• Scope 1: Direct Emissions occur from sources that are owned or controlled by the Group. We report Scope 1 Emissions that are coming from Company-owned vehicles.• Scope 2: Indirect Emissions from the generation of purchased electricity consumed by CTOS across all offices.

Base Year

Our base year is FY2022, covering the emissions for Scope 1 and 2.

Emission Factors

Scope	Emission Factors
Scope 1	Greenhouse Gas Reporting: Conversion Factors 2024. Published by UK Gov Department for Energy Security and Net Zero. Update 30 October 2024.
Scope 2	2017 CDM Electricity Baseline for Malaysia. Published by Malaysian Green Technology Corporation.

Calculation Methodology

Scope	Calculation Methodology
Scope 1	Total amount of fuel consumed (litre) x Average fuel-based vehicle specific emission factor (tCO ₂ e/litre)
Scope 2	Total amount of electricity purchased across all branches & buildings (kWh) x Grid emission factor (tCO ₂ e/kWh)



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