



Paradigm REIT Management Sdn Bhd

OCCUPATIONAL SAFETY AND HEALTH POLICY

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DEFINITION

Board	Board of Directors of Paradigm REIT Management Sdn Bhd
CEO	Chief Executive Officer
DIFA	Director of Investment, Finance and Accounts
HOFA	Head of Finance and Accounts
HOL	Head of Leasing
HOM	Head of Marketing
HOFM	Head of Facilities Management
HOCRS	Head of Compliance, Risk and Sustainability
Key Management	Consists of the CEO, DIFA, RD, HOFA, HOL, HOM, HOFM and HOCRS
Manager	Paradigm REIT Management Sdn Bhd
OSH	Occupational safety and health
OSHA	Occupational Health and Safety (Amendment) Act 2022
OSHMS	Occupational Safety and Health Management System
Paradigm REIT	A diversified REIT established in Malaysia and constituted by a deed of trust
RD	Retail Director
Service Provider(s)	External party(ies) with whom the Manager has, or plans to establish, some business relationship. This may include outsourcing providers, contractors, consultants, suppliers, vendors, advisors, agents, distributors and representatives.

1. INTRODUCTION

The Manager is committed to prioritising the safety and health of all individuals associated with its operations, including employees, Service Providers, tenants, shoppers, community, and other stakeholders, where practicable. The Manager believes in creating a workplace environment free from recognised hazards and strive to uphold this commitment in all its endeavours.

2. SCOPE

This Occupational Health and Safety Policy (“Policy”) applies to all employees, Service Providers, and stakeholders involved in Paradigm REIT’s operations. To foster a culture of compliance, the policy will be shared with Service Providers to demonstrate best practices. Additionally, the Manager encourages its stakeholders, including employees, Service Providers and tenants, to adopt similar values as outlined in this Policy.

3. COMMITMENT TO OCCUPATIONAL SAFETY AND HEALTH

The Manager is committed to protecting the safety and health of all members of the organisation and others who may be affected by its work. The Manager is dedicated to:

- a) Protecting safety and health: Ensuring a safe and healthy work environment for all employees and stakeholders by adhering to the highest standards of OSH.
- b) Preventing incidents: Preventing work-related fatalities, disabilities, injuries, ill health, diseases, property and environmental damage, and near misses through proactive safety management.
- c) Compliance with legislation: Strict adherence to the relevant national laws, including the OSHA and other applicable regulations and requirements to which the organisation subscribes.
- d) Employee consultation and participation: Ensuring that employees and their representatives are actively consulted and encouraged to participate in all elements of the Occupational Safety and Health Management System (“OSHMS”).

- e) Continuous improvement: Committing to the ongoing improvement of the OSHMS to enhance safety and health performance across all operations.

4. COMPLIANCE

The Manager adheres strictly to the OSHA and its associated regulations. These regulations cover critical areas such as workplace safety standards, chemical exposure limits, noise control, and the management of hazardous substances. The “Occupational Safety and Health Legislation Addendum” in Section 10 of this Policy outlines the specific regulations under OSHA that are pertinent to all operations related to Paradigm REIT. This approach ensures Paradigm REIT and the Manager’s compliance with OSH laws remain aligned with current legal standards.

5. INTEGRATION INTO BUSINESS OPERATIONS

The Manager’s commitment to OSH is integrated into its everyday business decisions and operations:

- a) Work Procedures: Safety considerations are embedded in all work procedures, ensuring that occupational safety and health are key factors in operational decisions.
- b) Responsible Materials Acquisition: The Manager prioritise purchasing materials and equipment that meet safety standards, reflecting its commitment to reducing risks associated with workplace hazards.
- c) Business Decision Making: Occupational safety and health is a core criterion in the Manager’s business decision-making processes, influencing everything from project planning to daily operational practices.
- d) Supply Chain Management: The Manager works closely with its Service Providers to ensure that they align with Paradigm REIT’s safety standards, thereby cascading the Manager’s commitment to OSH throughout the supply chain.

6. WORKER PARTICIPATION AND COMMUNICATION

The participation and consultation of workers, including their representatives where applicable, are essential to the successful development and implementation of an effective OSH policy. Paradigm REIT fosters a culture of open communication and collaboration, ensuring that OSH hazards and risks are effectively identified and addressed through cooperative efforts.

7. HEALTH AND SAFETY COMMITMENT

The Manager prioritises the well-being of its employees, tenants, and customers by adhering to the highest standards of OSH. This commitment is reflected in the Manager's ongoing efforts to maintain a safe and healthy workplace, free from recognised hazards.

8. COMMUNICATION AND TRAINING

The Manager shall conduct adequate awareness programs, trainings and refresher courses for all relevant personnel on a regular basis to ensure they continue to have a clear understanding and awareness of OSH. This will enable the personnel to continuously carry out their duties and responsibilities for OSH per section 9 below.

9. EMPLOYEE RESPONSIBILITIES

All employees of the Manager are expected to adhere to this Policy by:

- a) **Complying with OSH regulations:** Ensuring that all activities are conducted in full compliance with relevant OSH laws and regulations.
- b) **Reporting incidents:** Promptly reporting any safety incidents, near misses, or potential risks to the Key Management.
- c) **Participating in safety programs:** Actively engaging in initiatives aimed at improving occupational safety and health performance within the workplace.

10. OCCUPATIONAL SAFETY AND HEALTH LEGISLATION ADDENDUM

The following regulations and orders under the OSHA are applicable:

- a) Occupational Safety and Health (Construction Work) (Design and Management) Regulations 2024
- b) Occupational Safety and Health (Plants Requiring Qualification Certificates) Regulations 2024
- c) Occupational Safety and Health (Licensed Persons) Order 2024
- d) Occupational Safety and Health (Noise Exposure) Regulations 2019
- e) Occupational Safety and Health (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013
- f) Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning, and Occupational Disease) Regulations 2004
- g) Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000
- h) Occupational Safety and Health (Prohibition of Use of Substances) Order 1999
- i) Occupational Safety and Health (Safety and Health Officer) Order 1997
- j) Occupational Safety and Health (Safety and Health Officer) Regulations 1997
- k) Occupational Safety and Health (Safety and Health Committee) Regulations 1996
- l) Occupational Safety and Health (Employers' Safety and Health General Policy Statements) (Exception) Regulations 1995

The Occupational Safety and Health Legislation Addendum will be reviewed and updated as necessary, to ensure ongoing compliance with the latest OSH legislation.

11. CIRCULATION AND REVIEW

This Policy will be:

- a) Circulated to all existing and new employees;
- b) Updated as and when required and in any event at least once every three (3) years; and
- c) Any revisions or amendments to this Policy will be submitted for approval by the Board and communicated to all employees. The revised Policy will supersede the previous version.

(end of Policy)