

## Waste Management Policy

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### THIS POLICY APPLIES TO:

- MST Golf Group Berhad  
(Registration No.: 199301009307 (264044-M))
- MST Golf Sdn Bhd  
(Registration No.: 198901011987 (189294-P))
- MST Golf Management Sdn Bhd  
(Registration No.: 200101013452 (549209-A))
- MST Golf Arena Sdn Bhd  
(Registration No.: 199801015399 (471528-D))
- MST Golf (Singapore) Pte Ltd  
(Registration No.: 200002124N)
- Unless otherwise specified, any other companies that may become subsidiaries of MST Golf Group Berhad after the effective date of this document.

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### ADOPTION & REVISION HISTORY:

Rev.	Effective Date	Description	Approved by
0	15 Feb 2024	Formal Adoption	Executive Directors

(SEE NEXT PAGE FOR POLICY)

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## 1. INTRODUCTION

- 1.1. In line with their Environmental Policy, MST Golf Group Berhad (“Company”) and its subsidiaries listed on the cover page of this document (collectively including the Company, “Group”) adopt this Waste Management Policy (“Policy”) to outline their principles and methods of waste management.
- 1.2. This Policy specifies how the Group manages wastes that had already been generated, although the Group recognizes the equal importance of reducing the amount of waste generated at the first place, the methods of which are described in the Environmental Policy.

## 2. OBJECTIVE

- 2.1. With the implementation of this Policy, the Group aims to:
  - 2.1.1. Dispose waste responsibly, to minimise the amount of waste that goes to landfill.
  - 2.1.2. Collect and analyse waste management data for reporting as well as for improvement purposes.
  - 2.1.3. Ensure funds generated by the disposal of the waste (if any) are properly accounted for and used for purposes that are in line with the Group’s Sustainability Policy.
  - 2.1.4. Raise awareness among stakeholders on how they can contribute to the waste management efforts as well as benefit from them.

## 3. TYPES OF WASTES

- 3.1. The Group shall be responsible to properly manage all wastes generated by its operations, including but not limited to:
  - 3.1.1. Personal waste generated by employees at the Group’s properties and premise.
  - 3.1.2. Waste generated from business operations such as retail and indoor golf operations, warehouse and logistics operations, preparation for golf events, golf lessons and office operations.
  - 3.1.3. Golf products and their components including their packaging that had turned into waste for reasons such as obsolescence, defects or damages.
  - 3.1.4. Construction waste from renovation and new office construction.
- 3.2. The most common categories of wastes are papers, plastics, metals, glass, electronics, fabrics, rubber, liquids, chemicals, and food. However, the Group shall not limit its efforts to only these categories.

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### **4. ROLES AND RESPONSIBILITIES**

- 4.1. The Group's Sustainability Department carries the main responsibility of ensuring this Policy is properly implemented, including but not limited to:
  - 4.1.1. Assigning more specific responsibilities to suitable personnel;
  - 4.1.2. Setting up standard procedures pertaining to waste management;
  - 4.1.3. Reviewing suggestions and proposals regarding waste management;
  - 4.1.4. Provide trainings and briefings to raise awareness as well and on the procedures for waste management; and
  - 4.1.5. Ensuring compliance of the Group's waste management activities with the relevant laws, regulations, and other company policies.
- 4.2. Heads of departments shall assist the Sustainability Dept for the above purpose by:
  - 4.2.1. Conveying instructions and requirements to their subordinate and for the case of business outlets, to the respective teams of each business outlets;
  - 4.2.2. Monitoring their departments' waste management activities to ensure they are in accordance with this Policy as well as any instructions from the Sustainability Dept; and
  - 4.2.3. Provide feedback and suggestions for effective waste management.
- 4.3. Each business outlet's team, led by the outlet's person in-charge, shall ensure proper execution of the waste management instructions and requirements conveyed by the Sustainability Dept or their head of department.
- 4.4. Notwithstanding the above specified roles, all employees of the Group in carrying out their duties shall adhere to this Policy (especially the "Guiding Principles" below) as well as any waste management instructions or requirements from the Sustainability Dept from time to time.

### **5. GUIDING PRINCIPLES**

- 5.1. All waste management efforts shall be in no way deemed as for-profit. Any income generated from the waste management efforts shall only be used to further the Group's sustainability initiatives in a fair and transparent manner.
- 5.2. Although the Group is obligated to collect and report waste management data, the Group emphasises that all efforts to collect such data are not merely for complying with the reporting obligations but should be primarily to measure the effectiveness of and to facilitate the continual improvement of its waste management initiatives.

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- 5.3. The Group welcomes additional waste management efforts by employees beyond the roles and responsibilities specified above, so long as such initiatives (under the capacity of an employee of the Group) does not violate the laws, regulations, and company policies, and has undergone the process of proper review and approval by the Sustainability Dept.

### 6. WASTE MANAGEMENT METHODS

- 6.1. The specific methods and procedures stated herein shall be taken as guidelines only and may be varied to suit the nature of the location and operation of the premises. All offices and business outlets shall adhere to the specific methods and procedures as instructed by the Sustainability Dept. Regardless of the actual methods and procedures adopted, the main principles and objectives of this Policy including those stated under "Objectives" above shall remain universal.
- 6.2. Generally, the Group manages its waste by first sorting them into categories for reuse, recycling or general disposal, measuring their weights (in kg) for data collection, diverting recyclable items to third-party recycling companies and disposing general waste via municipal waste collectors.
- 6.3. The Group requires all employees to practice the 7Rs (Rethink, Refuse, Reduce, Reuse, Refill, Recycle, and Rot). They shall mindfully consider every waste using the 7Rs methodology to prioritise alternatives in the 7Rs order of sequence before discarding them into the general-waste bins as a last resort, to minimise the amount of general waste going to the landfills.
- 6.4. All business offices and outlets are required to separate recyclable wastes from general waste (i.e. non-reusable and non-recyclable waste). Whenever they are taken out as trash, weights of general waste shall be measured and recorded.
- 6.5. Reusable or recyclable waste shall be further sorted into categories as determined by the Sustainability Dept, which may differ from premise to premise depending on the location and nature of operations, as well as the extent of third-party recycling services available to said premise. Possible categories include paper, plastic, metal, e-waste, glass, food waste, used cooking oil, and golf product packaging waste (cardboard, plastic film, bubble wrap, apparel polybags, shoe boxes, etc.).
- 6.6. For **offices and business outlets within** the Klang Valley region:
- 6.6.1. Recyclable wastes that can be processed by the central waste management company appointed by Subang Jaya head office for Klang Valley operations, shall be transferred from the outlets to Subang Jaya warehouse via the Group's delivery vehicles.
- 6.6.2. Other recyclable wastes (that cannot be processed by the central waste recycling company mentioned in Clause 6.6.1.) may be disposed via other specialised waste management companies. One example of such waste is used cooking oil.

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- 6.6.3. At the Subang Jaya warehouse, the Sustainability Dept will arrange for the recyclable wastes to be collected by the appointed central waste management company.
- 6.6.4. Any income from selling the wastes shall be returned to the Finance Dept with supporting documents such as receipts within one working day.
- 6.7. For **offices outside** the Klang Valley region or Malaysia:
  - 6.7.1. Recyclable wastes may be collected directly by an appointed waste management company.
  - 6.7.2. Any income from selling the wastes shall be returned to the Finance Dept with supporting documents such as receipts within one working day.
- 6.8. For **business outlets outside** the Klang Valley region or Malaysia:
  - 6.8.1. Recyclable wastes may be collected directly by an appointed waste management company.
  - 6.9. Any income from selling the wastes shall be registered into the Point-of-Sale system under the "Waste Recycling code and deposited into the Group's bank account together with the daily sales cash.
- 6.10. The frequency of waste collection depends on the rate of waste accumulation. Respective persons-in-charge ("PIC") shall coordinate the collection frequency to avoid over-accumulation.
- 6.11. The PICs shall also be responsible to conduct waste audits to ensure that:
  - 6.11.1. Recyclable waste collected are sorted into the right categories (no mistakes in sorting, e.g., plastic waste in "paper" bin or paper waste in "plastic" bin);
  - 6.11.2. Only the appropriate items listed in the waste labels are sorted (e.g. if only specific plastics are accepted, then only those plastics shall be in the bin - not all plastics); and
  - 6.11.3. Recyclable wastes are discarded in the right conditions, i.e., clean, dry, without traces of food waste, food substance, or food residue.
- 6.12. The amount of collected waste shall be measured and recorded by the designated person in charge of each office or outlet using the waste data collection form provided by the Sustainability Dept. The following shall be observed while recording such data:
  - 6.12.1. Waste data shall be recorded honestly to ensure they truly reflect the amount of waste generated. The amount recorded is purely for monitoring the

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effectiveness of waste management efforts, and NOT reflection of employees' performance, so long as there is no data tampering or false reporting involved.

- 6.12.2. Waste data shall be recorded in a timely manner i.e. as soon as possible after the waste is collected by the waste management company. This is because the data will be analysed in a time-sensitive manner and any inaccuracy in date and time will affect the analysis.
  - 6.12.3. Care should be taken to ensure that all measurements are correct e.g. no duplicate measurements, and data is entered correctly e.g. correct decimal points, correct measurement units, and no typos.
- 6.13. Sustainability Dept and PICs shall regularly review the waste data to ensure correctness and adherence to standard procedures. Any errors and/or adjustments shall be immediately communicated among the offices, outlets and the Sustainability Dept.

### **7. APPOINTMENT OF THIRD PARTIES**

- 7.1. Any third parties engaged by the Group, such as waste management or waste recycling companies, shall be legal entities, licensed and operate in line with the waste management objectives of the Group. For example, a suitable waste management company should be able to process a wide range of wastes with the main aim of preventing them from going to the landfill, instead of only accepting wastes that are more profitable.
- 7.2. While each office or business outlet may engage directly with the waste management or waste recycling companies, such companies shall strictly be subject to the review and approval of the Sustainability Dept. Each business outlet team are welcomed to suggest suitable local waste recycling companies for consideration.

### **8. UTILISATION OF INCOME FROM WASTE MANAGEMENT**

- 8.1. The income generated from selling wastes shall be set aside in the Group's accounts and shall only be used as donations to suitable charitable or non-profit entities. This ensures that no amount of said income is used for any commercial purposes or any purposes that benefit only selected group of stakeholders. This also sends the right message to the Group's stakeholders that the waste management efforts are for environmental purposes and not for commercial gains.

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