PAVILION

REAL ESTATE INVESTMENT TRUST

Managed by
Pavilion REIT Management Sdn Bhd

OCCUPATIONAL SAFETY AND HEALTH POLICY

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This Policy provides the operating framework for the commitments summarised in the Occupational Safety and Health Policy Statement.

1 Introduction

Pavilion REIT Management Sdn Bhd is committed to providing and maintaining safe and healthy workplaces and managed properties, preventing work-related injury and ill health, and protecting employees, contractors, suppliers' workers, tenants, shoppers, visitors and members of the public who may be affected by its activities. The Occupational Safety and Health Management System (OSHMS) applies a risk-based approach consistent with the principles of ISO 45001, without implying external certification.

2 Scope

This Policy applies to all employees and activities under Pavilion REIT's control, including property operations, maintenance, projects, procurement, fit-out, events, emergency arrangements and business decisions. Requirements are extended, according to risk and influence, to contractors, suppliers, consultants, tenants, concessionaires and event organisers working at or supplying the managed properties.

3 Leadership, Commitments and Governance

Senior Management provides direction, resources and oversight. Business and property leaders are accountable for implementation within their functions, while EHS advises, monitors and reports performance. Pavilion REIT commits to:

- **Prevent injury and ill health.** Eliminate hazards where practicable and reduce residual risk to as low as reasonably practicable (ALARP) through the hierarchy of controls**.**
- **Comply with legal and other requirements.** Maintain and periodically evaluate an applicable legal register, statutory approvals, competent-person requirements and subscribed obligations.
- **Consult and involve workers.** Provide effective consultation, participation, reporting channels and protection from retaliation for good-faith safety reporting.
- **Set objectives and improve.** Establish measurable OSH objectives, responsible owners and time-bound action plans; review results and continually improve the OSHMS and safety performance.

4 Employee Health and Safety Management

Employee safety and health is managed through formal, documented processes that are proportionate to the hazards and operating context of each property:

- **Hazard identification and risk assessment.** Apply HIRARC, task risk assessment and dynamic assessment before work, after incidents and when activities, equipment, occupancy or conditions change; consider routine, non-routine and emergency situations and persons with specific vulnerabilities.
- **Operational control.** Use approved procedures, safe-work methods, permit-to-work, isolation, management of change, contractor controls, preventive maintenance, statutory inspection and workplace inspection to implement the selected controls.
- **Competence and supervision.** Define competency requirements; provide induction, information, instruction, role-based training, toolbox briefings and suitable supervision; verify licences, certificates and refresher needs; and retain training records.

- **Occupational health and wellbeing.** Assess exposure to chemicals, noise, ergonomics, heat and other health hazards; implement exposure monitoring, health surveillance or medical surveillance where required; support mental wellbeing and fatigue controls; and protect confidential health information.
- **Safe equipment and materials.** Specify safe design and procurement requirements, obtain safety data and certifications, inspect before use, maintain equipment and withdraw defective or unsafe items from service.
- **Reporting, investigation and correction.** Enable prompt reporting of hazards, near misses, incidents and occupational illness; provide immediate response; investigate underlying causes; assign corrective actions with owners and due dates; verify effectiveness; and complete statutory notifications when applicable.
- **Assurance and learning.** Conduct inspections, audits, trend analysis and management review; share lessons learned; recognise positive participation; and promote safe journey and commuting awareness where relevant.

5 Worker Consultation and Participation

Employees and their representatives are consulted through the Safety and Health Committee, risk assessments, toolbox meetings, briefings, inspections, incident investigations, change reviews and other suitable forums. Workers are encouraged to report concerns and may remove themselves from imminent danger in accordance with applicable law and company procedures, without discrimination or retaliation.

6 Supplier and Contractor Health and Safety

Supply-chain health and safety is integrated from pre-purchase through completion of goods or services. Pavilion REIT applies the following processes to relevant suppliers, contractors and their workforce:

- **Selection and contracting.** Evaluate OSH capability, legal compliance, competency, past performance and risk controls during pre-qualification and procurement; include applicable OSH requirements, reporting duties and enforcement provisions in contracts and purchase documents.
- **Planning and authorisation.** Require suitable risk assessments, method statements, competent persons, licences, insurance, equipment certification, emergency arrangements and permits before work begins.
- **Implementation and verification.** Provide or require induction and task-specific training, briefings and supervision; conduct site inspections, audits and performance reviews; record findings; require time-bound corrective action; and use stop-work, suspension or removal controls for serious or repeated non-conformance.

7 Customer and Public Safety

Pavilion REIT protects shoppers, visitors and other members of the public through risk-based property and activity controls, including:

- **Safe premises and systems.** Inspect and maintain public areas, access and egress routes, lifts, escalators, electrical installations, fire and life-safety systems and other public-facing assets; manage slips, trips, falling objects and accessibility risks; and complete statutory examinations where required.
- **Events, tenants and temporary works.** Assess crowd, queue, fire, electrical, structural, temporary installation and public-interface risks; require tenant and organiser compliance; maintain emergency access and at least the approved clear routes; and conduct pre-opening inspections for higher-risk activations.
- **Customer response and learning.** Provide first-aid and emergency arrangements, accessible reporting channels and timely assistance; record and investigate relevant incidents or complaints; preserve evidence; implement corrective actions; and communicate necessary safety information. Tenants and vendors are required to meet applicable safety requirements for products and services within their control.

8 Emergency Preparedness and Incident Management

Foreseeable emergencies are assessed and addressed through documented emergency response plans, defined command and communication arrangements, trained emergency response personnel, first-aid facilities, evacuation and assistance arrangements for persons requiring support, drills and exercises, and coordination with tenants, contractors, emergency services and relevant authorities. Plans are reviewed after exercises, incidents and material changes and interface with business continuity arrangements.

9 Responsibilities

- **Senior Management.** Approves this Policy, provides resources and holds leaders accountable for effective implementation**.**
- **Heads of function and property management.** Integrate OSH controls into planning, procurement, operations and change; verify implementation and close actions.
- **EHS and competent persons.** Maintain the management framework, provide advice, monitor compliance, coordinate assurance and escalate material risk.
- **Employees and workers.** Follow requirements, use controls and personal protective equipment, participate in consultation and training, and promptly report hazards, incidents and changes.
- **Suppliers, contractors, tenants and organisers.** Comply with applicable laws and Pavilion REIT requirements, protect their workers and the public, provide required evidence and correct non-conformances.

10 Performance Monitoring and Continual Improvement

Leading and lagging indicators are monitored at defined intervals. These include risk-assessment completion, inspection and audit results, permit and contractor performance, training and competency, hazard and near-miss reporting, incident trends, statutory compliance and corrective-action closure. Results are reported to management and the Safety and Health Committee, used to set priorities and disclosed externally where required.

11 Review and Approval

This Policy takes effect upon approval and is reviewed at least once every two years, and earlier following significant legal or organisational change, material incident, audit finding or change in risk profile. EHS coordinates review with the Safety and Health Committee and relevant functions. Amendments require approval by the Deputy CEO or CEO.

Appendix A: Applicable Legislation and Other Requirements

The controlled legal register determines applicability to each property, activity and project. The following list is non-exhaustive and shall be reviewed when legislation, standards or operations change. It does not replace the controlled legal register.

A. Occupational Safety and Health Legislation

Occupational Safety and Health Act 1994 [Act 514], as amended by the Occupational Safety and Health (Amendment) Act 2022 [Act A1648], in force from 1 June 2024, and applicable subsidiary legislation, including:

- Occupational Safety and Health (Employers' Safety and Health General Policy Statements) (Exception) Regulations 1995
- Occupational Safety and Health (Safety and Health Committee) Regulations 1996
- Occupational Safety and Health (Control of Industrial Major Accident Hazards) Regulations 1996, where the prescribed activities and applicability thresholds are met
- Occupational Safety and Health (Safety and Health Officer) Regulations 1997
- Occupational Safety and Health (Safety and Health Officer) Order 1997
- Occupational Safety and Health (Prohibition of Use of Substance) Order 1999
- Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000
- Occupational Safety and Health (Notification of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease) Regulations 2004
- Occupational Safety and Health (Classification, Labelling and Safety Data Sheet of Hazardous Chemicals) Regulations 2013
- Occupational Safety and Health (Noise Exposure) Regulations 2019
- Occupational Safety and Health (Fee for Registration of Competent Person and Registered Training Provider) Regulations 2024, where relevant
- Occupational Safety and Health (Construction Work) (Design and Management) Regulations 2024
- Occupational Safety and Health (Plant Requiring Certificate of Fitness) Regulations 2024
- Occupational Safety and Health (Licensed Person) Order 2024, where inspections are undertaken by a licensed person
- Occupational Safety and Health (Special Scheme of Inspection) Regulations 2025, where an approved scheme applies

B. Other Applicable Statutory Requirements

Other principal safety, fire, building, electrical and related statutory requirements monitored for applicability include:

- Fire Services Act 1988 [Act 341] and applicable subsidiary legislation, fire-certificate conditions and directives
- Street, Drainage and Building Act 1974 [Act 133], the Uniform Building By-Laws 1984 and applicable State, Federal Territory or local-authority adaptations
- Electricity Supply Act 1990 [Act 447], Electricity Regulations 1994 and applicable requirements of the Energy Commission

- Petroleum (Safety Measures) Act 1984 [Act 302] and applicable subsidiary legislation, where relevant to petroleum storage and handling, bulk LPG or gas-reticulation systems, petroleum equipment, transportation or pipeline activities
- Gig Workers Act 2025 [Act 872] and applicable subsidiary legislation, where the Manager or an applicable operating entity engages persons falling within the statutory definition of gig workers and qualifies as a contracting entity
- Applicable local-authority by-laws, statutory inspection requirements, approved industry codes of practice, contractual obligations and recognised standards adopted by Pavilion REIT

C. Management-System and Emergency-Management References

The following standards are used as internal framework references without implying certification:

- ISO 45001:2018, *Occupational health and safety management systems — Requirements with guidance for use*, including ISO 45001:2018/Amd 1:2024, *Climate action changes*
- MS 2735:2021, *Emergency preparedness and response (EPR) — Guidelines in managing emergencies in facilities*

Transition Note

The Factories and Machinery Act 1967 [Act 139] was repealed pursuant to the Factories and Machinery (Repeal) Act 2022 [Act 835], with effect from 1 June 2024. Applicable plant-certification and inspection requirements are now governed principally under the Occupational Safety and Health Act 1994 and its subsidiary legislation.