

SUSTAINABILITY REPORT

SELF-DECLARATION

TABLE OF CONTENTS

TOPICS	PAGE No.
Message From Managing Director	3
About ProMicom Services (M) Sdn. Bhd.	4
Stakeholder's Expectations & Engagement	5
Sustainability Strategy	7
Material Aspects & Boundaries	8
Public Policy & Political Engagement	10
Human & Talent Sustainability	11
Responsibly Marketing Our Products & Services	11
Quality, Occupational Health and Safety	12
Human Rights	14
Talent Attraction, Engagement & Growth	17
Environmental Sustainability	18
Water	20
Paper	21
Waste	22
Electricity	23
Fuel	25
Corporate Governance, Risk Management and Compliance	27

From the Managing Director's Desk

Globalization has changed the landscape in the way businesses are done around the world. Businesses are now more visible and are able to provide services more easily and are at the same time easily monitored.

It is therefore important for business to ensure proper and diligent business practices to fulfill stakeholder's requirements. At ProMicom Services (M) Sdn. Bhd., we intend to do just that, to balance growth, profitability and corporate sustainability taking the communities and environment into consideration. A holistic approach is necessary to ensure business continuity and progress. We are striving to reduce the environmental impacts of our business even though it is not very significant, improving the working conditions and developing the capability of our workforce (both on and off-site) to bring us to the next level.

It is clear that the private sector will face challenges in the global economy and we understand that working together collaboratively with our stakeholders is the key to our growth.

ProMicom, is fully committed to understand and fulfill stakeholder needs and expectations for environmental sustainability, health and safety. We are proud of the relationships we have built with many highly respected and reputable organizations and continue to be of service to them. We intend to expand and strengthen these partnerships. Our stakeholders bring in-depth experience and knowledge that is critical to solving glitches and we will continue seeking new opportunities to work together on areas that are most significant to our business and on which we can make a meaningful impact.

In this report, we describe how we are achieving progress through implementing the ISO 9001 and OHSAS 18001 management systems, sustainable practices, methods to conserve resources and promote workplace health and safety. These efforts have become a part of our business processes and are only some of the initiatives implemented that will help drive our business for generations to come.

Pandian Balasundaram

About ProMicom

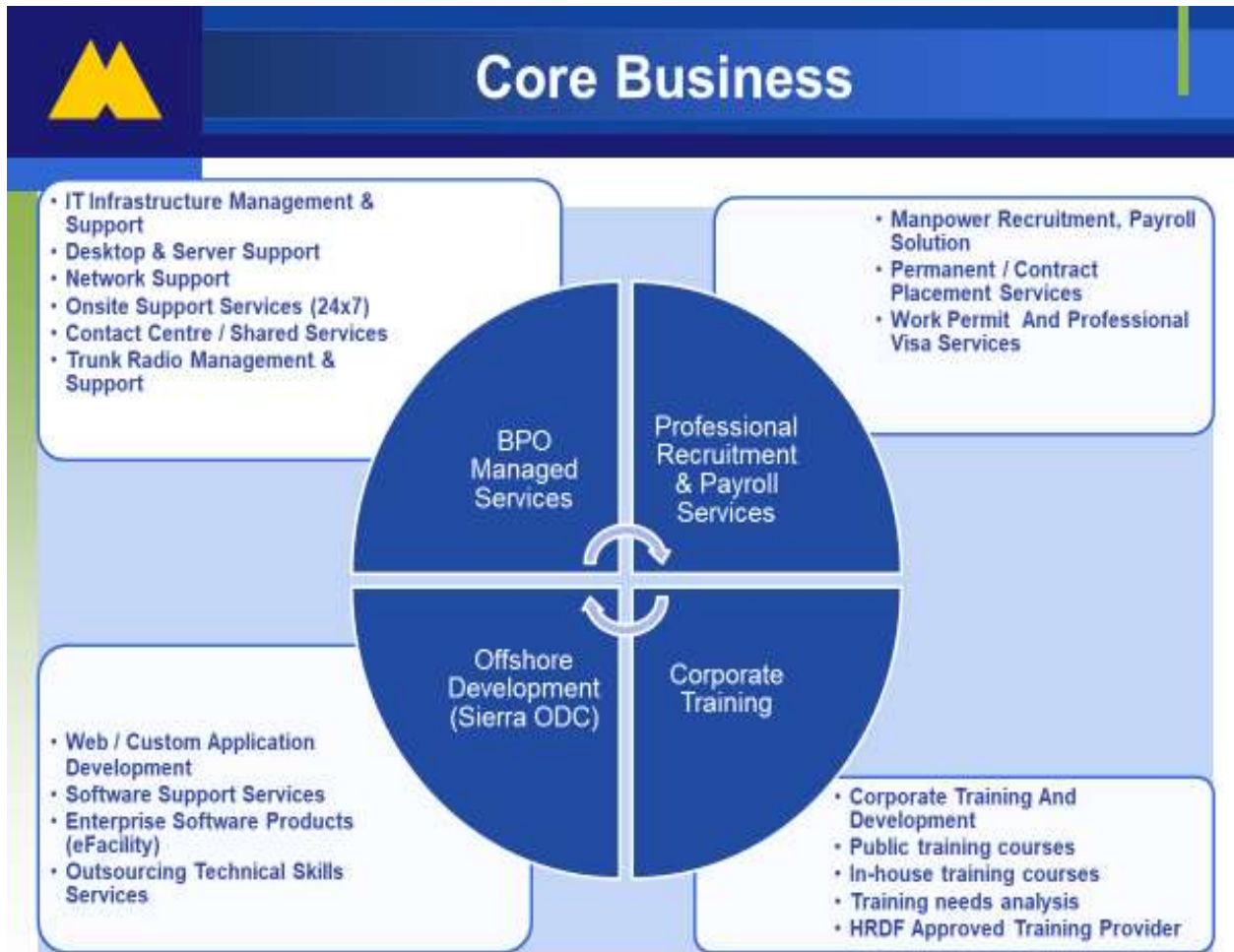
Promicom Services (M) Sdn Bhd (“Promicom”) is a private limited company incorporated in Malaysia and we have been in the Information Technology and Communications business since 1987, starting out as a partnership, Micom Computer Center and subsequently transitioning to Promicom Services (M) Sdn. Bhd. through a restructuring exercise in 2004. To enhance our service offerings to a wider market, we incorporated a joint venture with the owners of Sierra ODC (India) Pte Ltd to form Sierra ODC (M) Sdn Bhd in 1999. The primary objective of this JV was to build a network of technical IT resources available in the Indian Sub-continent to support our clients in Malaysia and expanding into customised software development. Subsequently, in 2003, we established a licensed professional recruitment firm, Agensi Pekerjaan JobOnline Sdn Bhd, to further expand our ICT services offerings through the provision of recruitment and professional contract labour supply to large multinational organizations based out of Malaysia. Our Head Office is based out of Seremban, Negeri Sembilan and we have a branch office in Cyberjaya, Selangor.

Over the past 30 over years, Promicom has established a proven record in the field of ICT outsourcing services, managed services, staff augmentation, staff recruitment, and back office payroll processing and employment services. Our major clients include Tenaga Nasional Berhad (TNB), Shell Group of Companies, PETRON group of companies, AT&T Malaysia, WHO (World Health Organization), Heng Yuan Refining Company (formerly Shell Refinery) in Port Dickson, PFIZER Malaysia, SKF Bearings Malaysia, PMP Drive Malaysia and several other multinational clients.

Currently 90% of our clients are multinational companies and government agencies from various business segments such as oil and gas, semiconductors, chemical, power, manufacturing, telecommunication and education.

Our Core Businesses

The diagram below illustrates our core business units and its activities.



Copyright © Promicom Services (M) Sdn Bhd

Driven by a strong technical team, we strive continuously to provide high quality and advanced technological products, professional services and training to meet the constantly evolving and demanding needs of corporations.

Our mission is:

- To be recognized as “Your Professional IT Services, Recruitment and Training Provider” offering quality services at minimum cost with a total commitment to customer satisfaction.
- Caring for the communities we serve, conserving energy and natural resources and creating a safe and better environment to live and work.

Stakeholder Expectations & Engagement

ProMicom, is committed to continuously fulfill stakeholder needs/expectations. In order for us to meet the needs/expectations of our stakeholders, we must first understand their requirements. Our stakeholders (especially clients, suppliers and contractors) contribute important views that inform our decisions and our strategy. To us, our stakeholders are our partners who drive us to improve our service provision and organizational growth.

We incorporate the needs/expectations of our stakeholders in our operations. Stakeholder feedback is used in our corporate strategy and helps guide our performance. Stakeholder feedback also helps us identify market conditions and issues as discussed in the Material Aspects & Boundaries section of this report. A summary of our stakeholders needs/expectation and engagement approaches is outlined in the table below.

STAKEHOLDERS NEEDS/EXPECTATIONS

External Parties	Needs/Expectations	Engagement
Regulators	1) Identification of applicable statutory and regulatory requirements, understanding of the requirements, application within our QMS & OHSAS, update/maintenance of them, compliance to them, prompt responses to investigations and enquiries	Meetings. Act books. Consultant briefing.
Customers	2) Conformance to requirements 3) Demonstrable ISO 9001 Conformance/Legal compliance 4) Value for money 5) Maintained levels of quality, social and environmental responsibility	Meetings. Contract. Help-desk. Customer survey. Supplier rating system.
End Users	6) Product/service information	Manuals. Meetings
Citizens	7) Legal compliance 8) Absence of incidents 9) Socially responsible	Feedback/Complaints.
Insurers	10) Prompt reporting incidents/changes in circumstances 11) Evidence of risk management	Reports. Policy.
Emergency Services	12) Regulatory compliance 13) Regular drills for site evacuation	Meetings. Yearly fire drill.
Media	14) Fast, accurate information concerning incidents to the local/national press. 15) Openness/transparency to everyone.	Interviews.

External Parties	Needs/Expectations	Engagement
Staff Dependents	16) Social/reputational responsible 17) Health and safety compliance	Annual dinner / Meetings
Banks	18) Meeting re-payment terms 19) Compliance with loan conditions 20) Good risk management 21) Legal compliance 22) Absence of incidents/public liabilities	Reports. Meetings.
Neighbors	23) Absence of incidents	Feedback.
Internal Parties	Needs/Expectations	Engagement
Staff	24) Good reputational image 25) Wider focus than just profit 26) Training and support 27) Safe and healthy working conditions 28) Continuity of employment 29) Opportunities for dialogue/improvement/changes	Meetings. Notice board. Implementation of ISO 9001 & OHSAS 18001 management systems. Training. Performance appraisal.
Contractors/Suppliers	30) Clear statement of requirements in tenders/contracts/orders 31) Consistent approach to contract variations 32) Adherence to agreements	Meetings. Reports.
Business partners	33) Adherence to agreements 34) Good risk management	SLA. Meetings.
Board of Directors	35) Financial benefit, legal compliance/avoidance of fines, reputational gain – corporate social responsibility (CSR), enhanced corporate governance (CG)	Meetings. Statement of accounts. Audits.

Sustainability Strategy at ProMicom

Businesses today operate in a volatile world. Business models need to evolve and adapt to the changing business environment. New challenges crop up and it is important for business to face these challenges to sustain its business. Population growth makes resources scarcer and increase in competition globally.

The recent oil price has had an impact on the business and this has made us strengthen our other business units such as information systems and infrastructure management services, training and payroll service provision and venture into other support industries such as telecommunication and manufacturing.

At ProMicom, we understand that innovating and improving the way we do business is key to sustainability and growth. We need to clearly understand the needs and expectations of our stakeholders and ensure that these needs are met consistently.

Our efforts are focused on four key areas:

- Commitment to Customers
- Talent Development
- Health & Safety Commitment & Compliance
- Environmental Commitment and Compliance

We have a total of 17 objectives as part of our management system implementation. Assuring and maintaining operational standards is something we take pride in. Our ability to retain people is increasingly linked to our ability to demonstrate that we are serious about talent and business development. We continually seek to identify ways to improve our services.

In order to ensure that the context of the organization and its associated risks are identified, ProMicom shall ensure compliance to the ISO 9001:2015 QMS standard and incorporate the ISO 14001:2015 EMS standards and best practices into our QMS by end of 2017. This is to further affirm our commitment to Quality, Environment, Occupational Health and Safety.

ProMicom has achieved most of its objectives defined for quality, health and safety. The same objectives will be maintained for consecutive years. However, more emphasis shall be put into the training division to meet the targets set for in-house training programs.

The challenges that we foresee in the coming years would be on the stabilization of the oil prices and market penetration into other sectors.

Material Aspects

Throughout the year, we engage with our stakeholders on a various issues. We discuss and gather information and opinions from our employees, directors, customers and consultants, regulatory agencies, and other interested stakeholders.

In recent years, we have received requests from some of our clients to report on our sustainability practices. As such we decided to prepare this report as part of our commitment to quality, talent development, environment, health and safety. We hope to develop a more detailed report in accordance to the GRI G4 reporting standard in the coming years.

The following Material Aspects table outlines the topics that are currently most relevant to ProMicom and our stakeholders. While our efforts to manage these issues mainly focuses on ProMicom’s operations, we continually seek to understand our impact throughout the value chain.

Material Aspects	
Financial Performance	Overall Financial Performance and Organizational Profile
	Stakeholder Engagement
	Public Policy & Political Engagement
Human Sustainability	Responsibly Marketing Our Products & Services
	Quality, Health & Safety Management Systems
Environment Sustainability	Water
	Paper
	Waste
	Electricity
	Fuel
Talent Development	Talent Attraction, Engagement & Growth
	Human rights
	Workplace safety
Corporate Governance	Risk Management and Compliance

During the reporting period between 2015 and 2016, there were no changes to the company regarding size, structure or ownership.

ProMicom uses an online tool – Carbon Footprint Calculator to calculate its greenhouse gas emissions. The use of water, fuel, paper and electricity are monitored on a monthly basis by the Finance Department.

Greenhouse gas emission is calculated based on this data.

The sources **of calculations used by the site are as follows.**

The calculations for primary emissions are based on conversion factors sourced from:

- Department for Environment, Food and Rural Affairs (DEFRA) - UK
- World Resource Institute (WRI) Greenhouse Gas (GHG) Protocol
- Vehicle Certification Agency (VCA) - UK
- US Environmental Protection Agency (EPA) - USA

- US Department of Energy (DOE) - USA
- Green House Office - Australia
- Standards Association (CSA) GHG Registries - Canada

ProMicom has documented procedure to control the use of environmentally hazardous substances and conflict materials. This procedure describes the control the usage of Environmental Hazardous Substances and Conflict Materials and to eliminate the usage of banned substances and conflict materials in any product and/or service provided by ProMicom.

Public Policy & Political Engagement

Public policy affects ProMicom's ability to operate a successful business. We participate, where necessary in public policy dialogue. We aim to make positive contributions that will lead to policies that will help our business and stakeholders succeed.

We strive for transparency in all of our business policies, procedures, contributions, dealings and other engagements. We strictly adhere to all laws and regulations relating to the business of the countries we operate in.

HUMAN & TALENT SUSTAINABILITY

Responsibly Marketing Our Products & Services

As a business, it is important for ProMicom to responsibly communicate about our products. Marketing and awareness can be tools for achieving this. Providing clients with fact-based information is a critical part of our strategy to market our products responsibly.

We have put procedures and provided training to staff to ensure that accurate information is provided to clients with regards to our products and services.

We update our marketing tools such as company profiles, website and brochures when there is new product information available.

As we seek to navigate through times of uncertainty, we are identifying new ways to promote our products and services and penetrate new industries. We will continue to market our products responsibly and update our clients on new technology and products.

We will also continue to provide training to employees to better communicate and provide services to our clients. We shall also develop a solid partnership with our suppliers and contractors.

We will conduct regular internal audits to monitor compliance with our ISO 9001 and OHSAS 18001 management systems.

Quality, Occupational Health and Safety

Implementing effective systems to ensure consistent and efficient operations is vital to any business. That is why ProMicom has implemented the ISO 9001:2015 Quality Management System and ISO 45001:2018 Occupational Health & Safety Management System. Both management systems have been implemented for the past 3 years and re-certification process done at the appropriate periods. a

The management is committed to ensure that ProMicom maintains a quality standard in line with the ISO 9001 Quality Management System and ISO 45001 Occupational Health and Safety Management System by documenting its quality, health and safety policies, procedures, work instructions and allocating resources for the effective implementation of the Quality, Health and Safety management systems.

There are inherent risks in any business operation. We have conduct a hazard identification, risk assessment and risk control (HIRARC) exercise for all our processes and have documented it. The HIRARC is reviewed on an annual basis. We have also identified the relevant OHS legal and other requirements. These legal and other requirements are evaluated on an annual basis to ensure compliance.

At ProMicom, one of the greatest risks to the health and safety of our workforce are vehicle accidents. The nature of our business requires that our site based staff face these risks daily. Keeping our staff safe is critical to our success. By empowering our staff through awareness and quality, health and safety training, we can reduce lost time, prevent operations disruption and avoid lawsuits. There were no major incidents recorded to-date.

We believe that our QHS management systems can help prevent health and safety incidents whether at the site or in the office. We adopted our OHS Policy to establish our commitment to occupational health and safety.

In order to ensure compliance with our OHS Policy and procedures throughout our operations, we have set QHS objectives and targets for each process. The implementation of these objectives and procedures are administered by the relevant departments. A Health and Safety committee has been set-up to discuss OHS issues on a quarterly basis and the results of the meetings are minuted. Quarterly OHS inspections are carried out and documented.

ProMicom also conducts internal management system audits and management reviews to monitor the effectiveness of its management systems and to continually improve its processes.

Third-party audit is conducted on an annual basis by NQA to assess ProMicom's compliance to the ISO 9001 and OHSAS 45001 international standards.

Supplier performance is evaluated on a yearly basis to ensure consistent supply and service provision.

ProMicom's Quality Policy is as follows:

ProMicom Services (M) Sdn. Bhd., a leading provider of "IT, Recruitment, Outsourcing and Training Services" is committed to consistently deliver quality services that shall meet or surpass customers' expectations.

We shall:

- Provide prompt services
- Provide effective customer focused solutions
- Implement and continually improve our processes
- Maintain a well trained workforce
- Ensure that this policy is understood, implemented and maintained
- Carry out periodical reviews of the management system to ensure its continuing suitability.

We are committed to continuous Quality Control monitoring of our daily activities with focus on People, Processes & Systems in order to achieve our goal of a high quality delivery system

ProMicom's Health and Safety Policy is as follows:

ProMicom Services (M) Sdn Bhd is committed to ensure a Safe and healthy working environment for our employees and contractors at all time, while at their place of work. We believe all injuries and incidents are preventable. Our goal for injuries, occupational illnesses and environmental incidents is zero.

To achieve this ProMicom and its Management will:

- Comply with relevant legislations and codes of practice.
- Continuously improve the areas concerning to Occupational Safety and Health standards.
- Provide information, supervision and training when required.
- Insist that safe work methods are used at all times.
- Implement and review Occupational Safety and Health policy periodically.
- Promote and protect Occupational Safety and Health of the employees at all time.

As individual we all must:

- Practice safe work methods, instructions, rules and regulations of OSHA Act 514.
- Report any unsafe conditions and equipment.
- Report all accidents and near miss incidents.
- Wear protective equipment's relevant to the place of work.

Human Rights

Respecting human rights is important to ProMicom and part of our values. At ProMicom, we treat all equally. We have developed a human rights, environment, ethics and labor code of business conduct for our suppliers setting the standards we expect our employees and the people who do business with us to uphold.

ProMicom's HEEL (Code of Business Conduct for Suppliers) defines our expectations of our suppliers to do business the right way. It is designed to help them meet their obligations, show respect to those in their workplaces, act with integrity in the marketplace and comply with all relevant rules and regulations. The HEEL includes requirements that address compliance with applicable law; human rights; equal opportunity; prohibition of forced or child labor; non-discrimination; bribery; fair competition; improper conduct; environment; and health and safety. The HEEL code is as per below:

Human Rights, Environment, Ethics & Labor (HEEL) Code of Business Conduct for Suppliers

ProMicom has implemented a set of principles on Human Rights, Environment, Ethics & Labor Code of Conduct (HEEL Code) for our suppliers to work with us. We are committed to these principles and will appreciate our suppliers to comply.

HUMAN RIGHTS & LABOR

No Human Rights Abuse: Suppliers shall conduct business in compliance to the employment act. This includes non-harassment/bullying, wages and benefits. Child and involuntary labor is prohibited.

No Discrimination: Suppliers shall not engage in unlawful discrimination in their employment practices. Suppliers shall not victimize anyone who reports or provides evidence of discrimination against them.

Equal Opportunity: Suppliers shall provide equal employment and advancement opportunities to all workers. Apply fairness and honesty at all times.

ENVIRONMENT, HEALTH AND SAFETY

Legal Requirements: Suppliers shall comply with all applicable environment, health and safety laws.

Practices: Supplier shall establish systems to ensure proper hazardous substance and waste management, prevention of pollution and conservation of resources. Suppliers shall ensure that no conflict materials are used in the products supplied to ProMicom unless it is declared and cleared.

Work Environment: Suppliers shall provide their employees and others working on their behalf with safe and healthy workplaces.

ETHICS

Avoid Conflicts of Interest: Suppliers shall avoid any interaction with a ProMicom employee that may conflict, or appear to conflict, with that employee acting in the best interests of ProMicom. This includes offering payments, gifts or employment opportunities to ProMicom employees.

Non-disclosure: Suppliers shall secure ProMicom's or its customers' private and confidential information that is in the supplier's possession. Suppliers shall use such information as per ProMicom's instructions and safeguard it from unapproved or unintended disclosure. This obligation continues after our business relationship ends.

No Bribery: Suppliers shall not engage in any form of commercial bribery or otherwise offer any incentive to any ProMicom employee or ProMicom employee's family or friends in order to obtain or retain ProMicom business. Suppliers will comply with all local or applicable laws dealing with bribery and anti-corruption.

Fair Competition: Suppliers shall fairly compete for business.

Accurate Business Records: Suppliers shall keep and provide to ProMicom upon request accurate records of all matters related to the supplier's business with ProMicom.

Implementation of Systems and Controls: ProMicom expects its suppliers to implement systems and controls to promote compliance with applicable laws and the requirements stated in this HEEL Code and where applicable, monitor its compliance.

Applicability to Supply Chain: Suppliers should also apply these or similar requirements to the suppliers they work with in providing goods and services to ProMicom.

Improper Conduct: Suppliers who believe that any ProMicom employee or anyone acting on behalf of ProMicom has engaged in illegal or otherwise improper conduct with respect to their business with the supplier shall report the matter to ProMicom's management. Suppliers shall also report any potential violation of this HEEL Code.

ProMicom reserves the right to investigate any instances of a supplier's noncompliance with this HEEL Code. Suppliers who are not in compliance with this HEEL Code are expected to implement corrective actions.

We have developed an employee handbook which outlines employee rules and regulations, benefits, grievance procedures, etc.

ProMicom has also established an equal opportunity policy as follows as part of its commitment towards a harmonious work environment.

ProMicom Services Sdn. Bhd. is committed to ensuring equal opportunity in the workplace and to provide a positive and continuous working and learning environment, equal employment and advancement opportunities where all individuals are treated in a fair manner, with respect and dignity, regardless of their status.

We believe that our commitment to fairness and respect for all helps create an environment that is conducive to the open exchange of ideas, attraction of competent staff and the development of effective products, services and processes.

In applying this policy, ProMicom is committed to the principle of non-discrimination against individuals on the basis of personal/religious/political beliefs, religion, ethnicity, race, color, gender, age, marital status and/or physical state unrelated to job requirements.

ProMicom values the contributions that each employee brings with his/her role within the organization.

Management Responsibilities

It is the responsibility of the management team (Directors and Department Heads) to:

- ensure that this policy is adhered to within their area of responsibility
- familiarize themselves with the Equal Opportunities policy
- ensure that employees are not advised/instructed to act in a discriminatory manner
- ensure they are not putting pressure on employees to discriminate
- communicate this policy and related procedure to all staff
- investigate, discuss and take immediate and appropriate action on any employee discrimination complaint(s), and resolve these complaints satisfactorily.

Staff Responsibilities

It is the responsibility of staff at all levels to:

- co-operate with any measures introduced to ensure equal opportunity
- report any discriminatory acts or practices encountered
- not induce or attempt to induce others to practice unlawful discrimination
- not victimize anyone who reports or provides evidence of discrimination against them
- not harass, abuse, bully or intimidate others at any time.

Talent Attraction, Engagement & Growth

To be a successful, competitive company, it is critical that we have a talented staff base. We want our staff to be passionate about their work and believe in ProMicom's mission, vision and values. We believe that the engagement of each and every one at ProMicom leads to productivity, creativity and improved retention rates.

One of the biggest challenges facing organizations today is attracting and retaining talented staff. ProMicom aims to engage staff in their daily work as well as improve their processes to foster personal and professional growth.

At ProMicom, we believe that providing a healthy, safe and open workplace and investing in our workforce is critical to our long-term success. As such we have implemented the ISO 9001 and OHSAS 45001 management systems as a commitment to a quality, healthy and safe work environment. We identify training needs on an annual basis and have engaged a consulting company to carry out a comprehensive training needs analysis for the entire organization. This involved identifying areas for continuous improvement at an organizational, departmental and individual level.

To attract the talent required, we have implemented systems and believe in open communication. Staff are encouraged to recommend improvements and provide feedback on how we can make the workplace better. We also provide comprehensive compensation, healthcare insurance, EPF, SOCSO and performance incentives based on appraisals. We also emphasize our commitment to learning and development. We are embarking on a multi-tasking effort so that there is support throughout the organization and increase in knowledge.

We contribute to the Human Resources Development Fund as part of our commitment to learning and development. These funds are utilized to provide training to staff based on the annual training plan and as and when relevant trainings are identified to up-skill staff. We also encourage staff to increase their skillsets through cross-learning and sharing experiences with other departments within the organization.

Talent attraction, engagement and growth is ongoing and continuous process. We believe that our staff are part of the organization and we aim to provide new opportunities for learning and development.

ENVIRONMENTAL SUSTAINABILITY

The natural world is changing rapidly and with extreme implications for the environment, people, governments and businesses. The demand for the world's resources continues to increase at an alarming rate. The tensions between increasing population, shifting economic power and the boundaries are showing that business is not very sustainable.

The demand for natural resources such as water, energy, raw materials has increased we at ProMicom are doing our best to minimize the use of the basic natural resources. We also implemented and incorporated the standards and best practices of ISO 14001 into our QMS. By investing in a safe and healthier future for people and earth, we are also investing in a more successful future for ProMicom.

We have documented a resource conservation procedure which includes ways to reduce the use of paper in our activities by recycling used paper, use of paper on both sides, identifying software that can control documents in soft copy, creating awareness among staff. The procedure also contains ways to reduce the use of water, electricity and fuel as part of our resource conservation initiatives.

We have established environmental objectives as per the table below to show our commitment towards environmental sustainability, and to reflect the relevance of the global crises we collectively face. We have documented environmental programmes to achieve each environmental objective. We are positively engaging to meet the changing needs of our business and its environment. We have sought and will continue to seek advice from stakeholders to seek ways to improve environmental practices.

Environmental Objectives

No.	Objective	Target
1	To reduce the use of electricity	3% from 2015 usage over a period of 5 years
2	To reduce the use of paper	5% from 2015 usage over a period of 5 years
3	To reduce the use of water	1 litre per person from 2015 usage
4	To reduce the use of fuel (petrol) used for cars/travelling	3% from 2015 usage over a period of 5 years
5	Proper storage and disposal of wastes	100% recycling where feasible

We work with others wherever possible to share best practices and learn from others to understand the how we could introduce sound environmental practices even in any small way. We engage with other businesses owners, through industry forums, and with clients, governments and consultants in the implementation of environmental practices.

To support the achievement of our environmental objectives and to address specific issues, we have documented an environment policy as follows:

ProMicom's Environment Policy

ProMicom Services (M) Sdn. Bhd., a leading “IT, Recruitment, Outsourcing and Training Services” provider recognizes its responsibility to the environment and use of energy and believes it should take every opportunity to protect and nurture it.

To achieve this, ProMicom and its management will:

- comply with all applicable environmental legal and other requirements to which it subscribes;
- minimize environmental impacts caused by our operations and business processes in order to prevent pollution and harm to the environment;
- minimize waste generation, energy usage and conserve natural resources (reduce, re-use, recycle, re-think) as far as is practicable;
- support the purchase of energy-efficient products and services;
- ensure proper methods of managing wastes are followed;
- provide necessary information and resources to implement environment and energy related activities;
- not use banned substances and conflict materials;
- continually improve environment and energy performance;
- set and review environment and energy policy, procedures, objectives and targets;
- provide appropriate environment and energy related training for personnel;
- communicate this policy to all persons working for or on behalf of our organization and make it available to public.

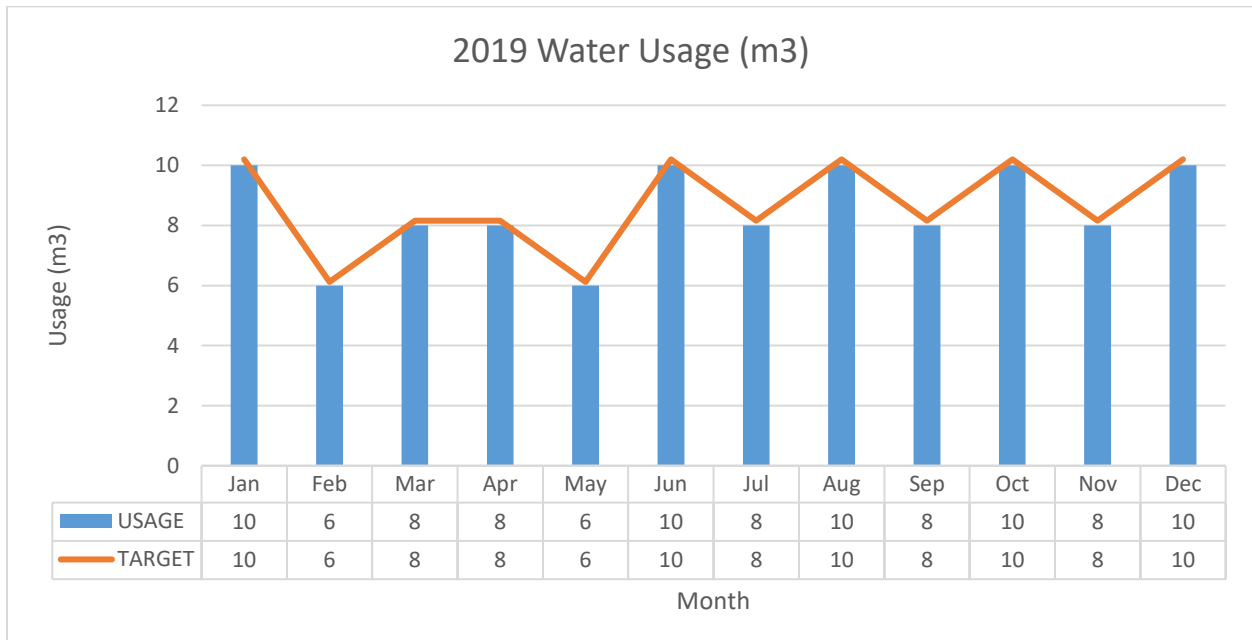
Water

Our business does not rely much on water as we are service based. Water is used in our office at the pantry and toilets. However, we recognize that water is a shared resource, and we have set an objective and activities to reduce the amount of water utilized in the office and at our clients' premise where our services are provided.

We have installed a water filter system to ensure staff have access to clean drinking water. The water filter system is serviced periodically by an appointed vendor.

Our water usage is as per below. The data is derived from our monthly water bill. The usage is from 6m³ to 10m³ per month. There is no change in price due to the usage amount. The water usage will be compared on a year and month to month basis to evaluate and analyze usage of water. Below are our water usage data and trend graph for 2016.

MONTH	USAGE	AMOUNT
Jan-19	10m ³	30.00
Feb-19	6m ³	30.00
Mar-19	8m ³	30.00
Apr-19	8m ³	30.00
May-19	6m ³	30.00
Jun-19	10m ³	30.00
Jul-19	8m ³	30.00
Aug-19	10m ³	30.00
Sep-19	8m ³	30.00
Oct-19	10m ³	30.00
Nov-19	8m ³	30.00
Dec-19	10m ³	30.00



Paper

Forests clean the air we breathe, protect the habitats of animals and plant life, and filter drinking water. They also provide wood fiber for the paper we use. When we do use virgin paper in our product packaging, we ensure that it comes only from sustainably managed forests and manufacturers that carry out re-planting.

We have embarked on a paper reduction program and have set an objective to reduce the usage of paper. ProMicom is considering to implement a paperless system for its ISO 9001 and OHSAS 14001 management system documentation by the end of 2017.

Paper usage data for 2019 is as per below:

MONTH	USAGE	No. of Reams (Grams / Ream)
Apr-19	425.00	50 Rim(80gsm)
Sep-19	455.00	53 Rim(80gsm)

Waste

Waste generated and disposed at ProMicom is from the pantry and office activities. The waste generated are of general in nature. There are no scheduled wastes generated as a result of the activities as the electronic wastes (computers, keyboards, hard disks, servers) are sold to licensed contractors who recycle old or damaged electronic wastes. Electronic wastes generated at the clients' site are disposed-off by the clients according to local regulations.

Material that can be salvaged for future use is done so by the Technical Department. This helps in reducing both waste and cost. A procedure has been documented to capture ways to control and monitor waste. This is in line with our commitment to the implement and incorporate the standards and best practices of ISO 14001 environmental management into our QMS system by the end of 2017.

No.	Type of Waste	Disposal Method
1	Paper, carton boxes, cardboard	Recycle
2	General waste (food, bottles, plastic)	Local Council
3	Electrical/Electronic Waste (E-Waste)	Licensed Contractor/Recycle
4	Lead-acid batteries (from car servicing)	Automotive Workshop

ProMicom shall implement the segregation of recyclable wastes once it starts to implement and incorporate ISO 14001 standards and best practices into its QMS system implementation and will then identify suitable vendors to collect recyclable wastes or drop it off at recycling centres.

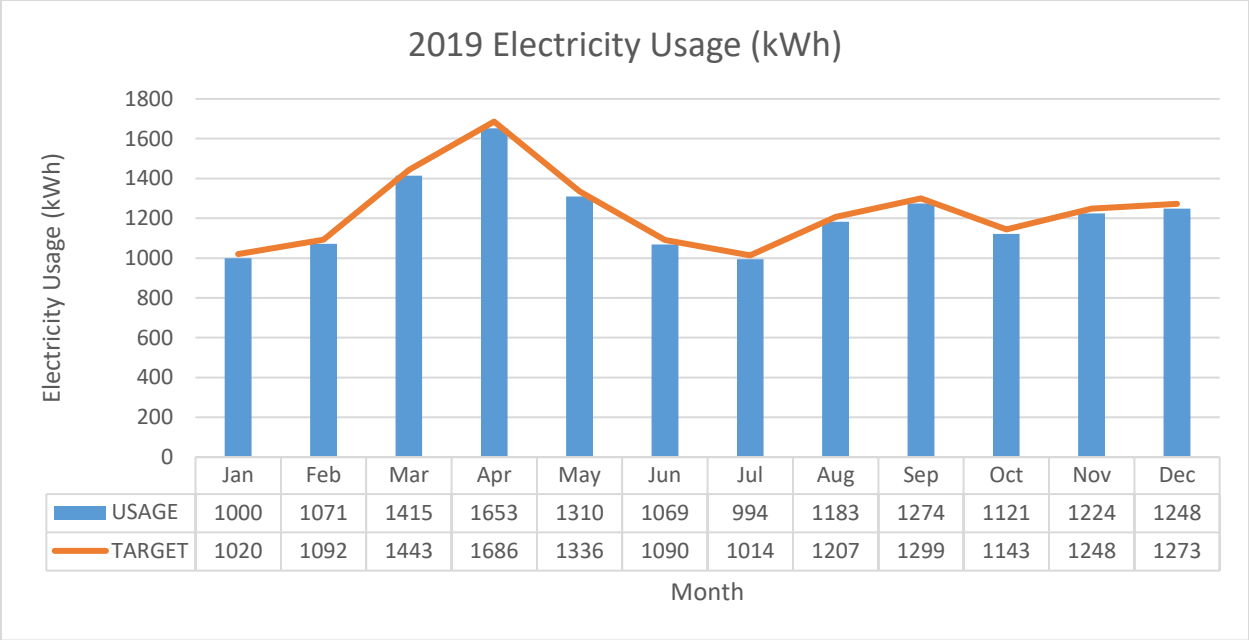
Electricity

At ProMicom, electricity is used at the office. We have set an objective to reduce the use of electricity in the office and outlined programmes to achieve this objective. Some of the programmes are as follows:

- to switch off lights during break times
- to identify the feasibility of installing LED lights
- to switch off and unplug computers when not in use or after working hours
- to check condition of plug points during safety inspections
- to provide awareness to staff on the importance of energy usage

Below are electricity usage data and trend graph for 2019.

MONTH	USAGE (kWh)	AMOUNT (MYR)
Jan-19	1000kWh	518.55
Feb-19	1071kWh	555.62
Mar-19	1415kWh	734.35
Apr-19	1653kWh	857.35
May-19	1310kWh	679.87
Jun-19	1069kWh	554.51
Jul-19	994kWh	515.43
Aug-19	1183kWh	613.93
Sep-19	1274kWh	660.80
Oct-19	1121kWh	581.49
Nov-19	1224kWh	635.04
Dec-19	1248kWh	647.50



The carbon footprint for electricity usage is 1586000 metric tons of CO₂e for year 2019.

Fuel/Greenhouse Gases

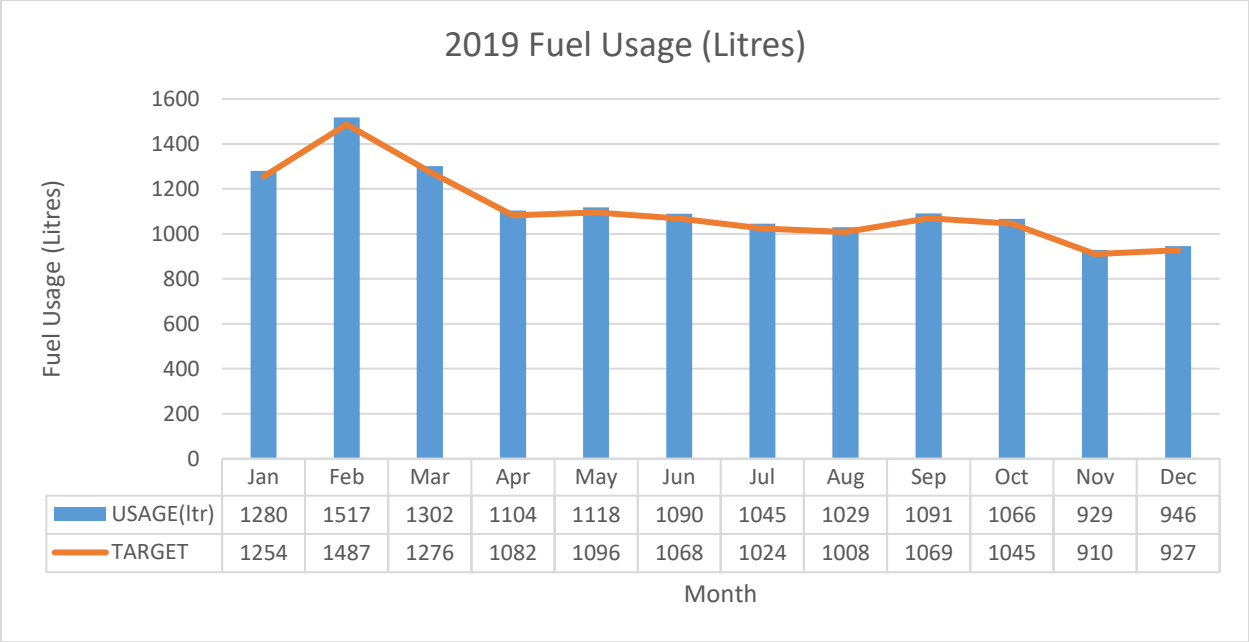
At ProMicom, emissions are from the vehicles used for the provision of services to its clients at site. There is no other process from which smoke, gases or dust is generated. However, we will need to adapt to the effects of rising global temperature and increasingly unpredictable and severe weather patterns as we are part of the global economy while reducing our contributions to this temperature increase by managing the amount and type of energy used in our service provision and supply chain.

By doing this, we see positive impacts such as lower greenhouse gas emissions; lesser human exposure to hazardous gases; improvement in energy supply; and contribution to cleaner air in the communities in which we operate. The role of business in contributing to climate change is also under continuous review. Governments are looking at how regulatory frameworks can decrease the impact of businesses to the environment.

We have set an objective to reduce the use of fuel for vehicles as that is one of the main contributors to greenhouse emission from the services we provide. This is monitored on a monthly basis and the data is evaluated and analyzed during the management meeting.

Below is the fuel usage data and trend graph for 2019.

MONTH	USAGE	Price per LITER(MYR)	LTR
Jan-19	2368.63	1.85	1280
Feb-19	2654.20	1.75	1517
Mar-19	2083.07	1.60	1302
Apr-19	1877.24	1.70	1104
May-19	1900.82	1.70	1118
Jun-19	1853.66	1.70	1090
Jul-19	1827.98	1.75	1045
Aug-19	1800.54	1.75	1029
Sep-19	1855.42	1.70	1091
Oct-19	1919.52	1.80	1066
Nov-19	1812.15	1.95	929
Dec-19	1797.55	1.90	946



The carbon footprint for petrol usage is 1900580 metric tons CO2e for year 2019.

CORPORATE GOVERNANCE, RISK MANAGEMENT AND COMPLIANCE

Strong corporate governance is a priority at ProMicom. We believe it is the foundation for financial integrity, client confidence and superior performance. Our reputation depends on strong leadership and the exceptional management of all aspects of our business. The fundamental role of the directors is to exercise their judgment and to act in a way that are in the best interests of the organization and its stakeholders. Directors rely on the honesty and integrity of the legal, accounting, financial and other advisors. All directors are expected to attend the organization's annual meeting.

We maintain open channels of communication between stakeholders and ProMicom's management, which enables us to respond to the issues promptly and accurately. We incorporate our corporate Values into every aspect of our business and decision-making. This integration of value-based decision-making is part of our governance structure and helps us maintain our integrity as a business entity.

We take accountability for our actions. Our business strategy and affairs are overseen by the Directors. The Directors meets regularly to discuss the strategic priorities of our company, taking into consideration economic, client and other significant trends, as well as changes in the IT Services, Recruitment and Training. We also regularly discuss and review feedback from our stakeholders through management review meetings.

Annual accounting is done by a registered accountant and tax returns are filed on-time. Our engagement activities have provided us with valuable feedback from our stakeholders, who have contributed their viewpoints that inform our decisions and our strategy.

The achievement of our quality, health and safety objectives involves taking risks. ProMicom shall identify its internal and external business context, identify, assess, evaluate, control, monitor and communicate these risks across the company's operations. This shall be done by the next ISO 9001 re-certification audit.

Our risk management framework helps us align risks and opportunities to our strategic objectives. This is achieved through a formal risk process:

Determination of internal and external context of the organization: This is done through a SWOT or PESTLE analysis and shall be tabulated.

Risk Identification: An initial risk identification shall be done within the organization. From then on, an annual top-down review to identify risks shall be done. Identification includes both internal and external risk sources.

Risk Assessment: Each department assesses the identified risks from a probability, severity/impact perspective.

Risk Evaluation: Once the risks are assessed, they are evaluated and classified as low, medium or high based on ability to influence/mitigate.

Risk Control: Risk owners determine the response to each significant risk.

Risk Monitoring: The risk are monitored and shall be reviewed on an annual based to evaluate their significance and determine if there are new risk or opportunities.

Communication & Reporting: The risks identified and actions planned shall be communicated to all within the organization through meetings, risk format and trainings, where applicable.

Risk Management: Risk discussions shall be included into our planning process and ongoing business reviews, to ensure mitigation plans are in place and risk-tolerance levels are linked to the company's strategic objectives and key business decision-making.

We integrate of our risk management framework into our strategic planning process in order to link our business risks and business strategies. We use this risk management practice to identify trends that help develop our strategies and also to identify key risks that could hinder us from achieving those strategies. Integrating risk with strategy helps protect the organization from future uncertainty and exploit opportunities.

Our policies and procedures are our road map to acting ethically and in compliance with all applicable laws and regulations. This is also evident through the implementation of the ISO 9001 and OHSAS 18001 management systems. ProMicom ensures its compliance to all applicable business laws and any changes are updated through its company secretaries whenever there is a need.