

	OPERATIONS CONTROL SERVICES	Revision No.: 0	Document Effective Date: 01 Sept 2026	Page 1 of 5
	Legal And Other Compliance Procedure			Document Ref: OCS-S-PRO-03

Purpose:	To establish a controlled process for identifying, accessing, determining applicability, communicating, implementing and periodically evaluating compliance with OH&S legal and other requirements.
Scope:	This procedure applies to Malaysian and relevant overseas OH&S legislation, regulations, orders, codes, licences, permits, authority conditions, contracts, client requirements and voluntary commitments applicable to the Company and its projects.
Duties & Responsibilities	(1) <u>Managing Director (MD)</u> : Ensures commitment and resources for compliance and reviews material noncompliance. (2) <u>Executive Director (ED)</u> : Oversees compliance governance and escalation. (3) <u>ISO Manager (IM)</u> : Maintains the legal and other requirements process and controlled register. (4) <u>Safety and Health Officer (SHO)</u> : Identifies OH&S obligations, evaluates applicability and coordinates compliance evaluation. (5) <u>Heads of Department / Project Managers</u> : Implement applicable obligations and provide evidence of compliance. (6) <u>Legal / Company Secretarial Function</u> : Advises on interpretation and regulatory changes where required. (7) <u>Workers and Worker Representatives</u> : Provide relevant workplace information and participate in compliance matters affecting them.
ISO Reference:	MS ISO 45001:2018 Clause 6.1.3

Revision History			
Revision No.	Revision Date	Originator	Description of Changes
0	01 Sept 2026	ISO Manager	Initial issue for implementation of MS ISO 45001:2018 Clause 6.1.3

Abbreviation & Definition	
CIDB	Construction Industry Development Board
DOSH	Department of Occupational Safety and Health
ED	Executive Director
HOD	Head of Department
IM	ISO Manager
MD	Managing Director
OHS	Occupational Health and Safety
OHSMS	Occupational Health and Safety Management System
PIC	Person in Charge
PM	Project Manager
SHO	Safety and Health Officer
ST	Energy Commission of Malaysia

	OPERATIONS CONTROL SERVICES	Revision No.: 0	Document Effective Date: 01 Sept 2026	Page 2 of 5
	Legal And Other Compliance Procedure			Document Ref: OCS-S-PRO-03

Step	Activity	PIC	Reference
1	<u>Identification of Legal and Other Requirements</u> 1.1 Legal Sources The IM and SHO shall monitor applicable Acts, regulations, orders, approved codes, guidelines, authority conditions and official notices from DOSH, CIDB, ST, BOMBA, local authorities and other relevant regulators. 1.2 Other Requirements Identify contractual, client, principal contractor, insurer, industry, group-policy and voluntary commitments adopted by the Company. 1.3 Jurisdiction For overseas work, obtain competent local advice and maintain a country- and project-specific register. 1.4 Authoritative Access Use current official publications, regulator portals, gazettes, licences, permits and competent legal or technical advice.	IM / SHO / Legal / HOD / PM	OSHA 1994 (Act 514); OHSMS-06K
2	<u>Determination of Applicability</u> 2.1 Activity Mapping Evaluate each requirement against the Company's legal entities, workplaces, activities, equipment, substances, workforce, contractors and project lifecycle. 2.2 Obligations Translate applicable provisions into clear obligations, responsible functions, compliance methods, evidence and review frequency. 2.3 Construction Requirements Consider current construction design and management duties, project notification/registration, competent appointments and coordination requirements. 2.4 Technical Requirements Consider electricity, machinery, lifting, pressure systems, chemicals, noise, ergonomics, occupational health, fire safety, emergency and welfare obligations as applicable.	IM / SHO / Legal / HOD / PM	DOSH / CIDB / ST / BOMBA requirements

	OPERATIONS CONTROL SERVICES	Revision No.: 0	Document Effective Date: 01 Sept 2026	Page 3 of 5
	Legal And Other Compliance Procedure			Document Ref: OCS-S-PRO-03

Step	Activity	PIC	Reference
3	<u>Legal and Other Requirements Register</u> 3.1 Register Content Record source, title, provision/obligation, applicability, affected activity/location, PIC, compliance method, evidence, evaluation frequency, latest review date and status. 3.2 Status Control Identify new, amended, pending, superseded and repealed requirements and retain traceability of changes. 3.3 Supporting Evidence Link licences, permits, registrations, certificates, statutory inspection reports, authority correspondence and other evidence. 3.4 Access and Protection Make applicable requirements accessible to relevant personnel while protecting licensed or restricted material.	IM / SHO	OHSMS-06K; OHSMS-07N; OHSMS-07O
4	<u>Communication and Operational Integration</u> 4.1 Communication Communicate applicable requirements and changes to responsible managers, supervisors, workers, contractors and worker representatives in a suitable form. 4.2 OHSMS Integration Incorporate obligations into HIRARC, objectives, design, procurement, method statements, PTW, training, maintenance, inspections, emergency plans and contractor controls. 4.3 Tender and Mobilisation Legal and client requirements shall be reviewed during tendering and before mobilisation, with competent resources and registrations confirmed. 4.4 Change Management Assess legal implications before implementing organisational, technical, operational or project changes.	IM / SHO / HOD / PM / Commer cial / Procure ment	OCS-S-PRO-01; OCS-S-PRO-02; CD-S-PRO-01

	OPERATIONS CONTROL SERVICES	Revision No.: 0	Document Effective Date: 01 Sept 2026	Page 4 of 5
	Legal And Other Compliance Procedure			Document Ref: OCS-S-PRO-03

Step	Activity	PIC	Reference
5	<u>Compliance Planning and Implementation</u> 5.1 Compliance Plan Each responsible PIC shall establish actions, resources and deadlines needed to meet applicable obligations. 5.2 Licences and Time-bound Obligations Maintain advance reminders for permit, licence, registration, certificate, inspection, medical surveillance and competent-person expiry dates. 5.3 Contractor Compliance Contracts and purchase documents shall specify applicable obligations and required evidence; performance shall be monitored. 5.4 Consultation Workers and representatives shall be consulted on legal and other requirements affecting their work and protection.	HOD / PM / SHO	OHSMS-05I; PD-S-PRO-07; ADM-S-PRO-01
6	<u>Evaluation of Compliance</u> 6.1 Planned Frequency Compliance shall be evaluated at least annually and more frequently according to legal deadlines, risk, project requirements, changes or past performance. 6.2 Evaluation Methods Use document review, interviews, observation, sampling, inspections, licence verification and confirmation of statutory submissions or examinations. 6.3 Competence and Independence Evaluators shall be competent and sufficiently objective. Specialist legal or technical advice shall be obtained where interpretation is uncertain. 6.4 Conclusion Record Compliant, Partially Compliant or Noncompliant status with evidence, action, PIC, due date and re-evaluation result.	IM / SHO / Legal	OHSMS-09S; OHSMS-09T
7	<u>Noncompliance and Regulatory Interface</u> 7.1 Immediate Control A legal noncompliance or imminent compliance risk shall be controlled immediately and escalated to the responsible HOD/PM, SHO, ED and MD according to significance.	MD / ED / IM / SHO / HOD / PM / Legal	OHSMS-10V; PD-S-PRO-11

	OPERATIONS CONTROL SERVICES	Revision No.: 0	Document Effective Date: 01 Sept 2026	Page 5 of 5
	Legal And Other Compliance Procedure			Document Ref: OCS-S-PRO-03

Step	Activity	PIC	Reference
	7.2 Notification The authorised function shall notify the regulator, client or other party within applicable timeframes where required. 7.3 Corrective Action Record correction, root cause, corrective action, resources, due date and effectiveness verification. 7.4 Protection and Cooperation Preserve evidence, cooperate with lawful authority requirements and protect workers who report concerns in good faith.		
8	<u>Change Monitoring, Review and Records</u> 8.1 Change Monitoring Review official sources at planned intervals and after regulatory announcements, enforcement action, new work or entry into a new jurisdiction. 8.2 Impact Assessment Determine affected processes, documents, competence, resources and deadlines and assign implementation actions. 8.3 Management Review Report compliance status, significant changes, noncompliance, enforcement, resource needs and trends to Top Management. 8.4 Retention Retain registers, applicability assessments, communications, evaluations, legal advice, permits, submissions and action evidence according to applicable retention requirements.	MD / ED / IM / SHO / Legal	OHSMS-09U; OHSMS-07O

Verified By: Name: Eng Choon Leong Appointment: Executive Director Date: 01 Sept 2026	Approved By: Name: Amos Haw Chee Seng Appointment: Managing Director Date: 01 Sept 2026
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