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	Annex B – External & Internal Issues Affecting The Company			Document Ref: OHSMS-04B

Purpose:	To establish the method for determining, monitoring and reviewing external and internal issues that can affect the Company's ability to achieve the intended outcomes of its MS ISO 45001:2018 Occupational Health and Safety Management System. The assessment supports strategic planning, prevention of work-related injury and ill health, compliance with applicable requirements, worker consultation and continual improvement across the Company's Mechanical and Electrical engineering and contracting activities.
Scope:	This document applies to the provision of supply, installation, maintenance and servicing of Mechanical and Electrical systems undertaken at corporate offices, project sites, workshops, stores and temporary facilities. It covers 132 kV substation construction, 33/11 kV substations, continuous glucose system manufacturing plants, industrial and green plants, utility infrastructure, commercial and residential developments, service and maintenance operations, data centres and overseas projects under the Company's control or influence.
Duties & Responsibilities:	<u>Executive Director (ED)</u>: shall ensure that relevant context issues are considered in strategic direction and management review. <u>ISO Manager (IM)</u>: shall coordinate the PESTLE and SWOT assessments, consult the SHO, project leaders, competent electrical persons, workers and relevant process owners and maintain this controlled record. <u>Head Of Department (HOD) and Project Manager (PM)</u>: shall identify changes affecting their functions and projects, evaluate the associated occupational health and safety risks or opportunities and implement approved controls. <u>Safety & Health Officer (SHO)</u>: shall verify that significant issues are reflected in HIRARC, legal compliance, objectives, operational controls, emergency arrangements, audits and performance evaluation. <u>Workers and their representatives</u>: shall be consulted on issues that affect their health, safety and working conditions.
ISO Reference:	MS ISO 45001:2018 Clause 4.1

Revision History			
Revision No.	Revision Date	Originator	Description of Changes
0	01 September 2026	ISO Manager	Initial issue for implementation of MS ISO 45001:2018 Clause 4.1 including Amendment 1:2024 climate action changes.

Abbreviation & Definition	
DOSH	Department of Occupational Safety and Health Malaysia.
HIRARC	Hazard Identification, Risk Assessment and Risk Control.
IM	ISO Manager.
M&E	Mechanical and Electrical.
OHSMS	Occupational Health and Safety Management System.
PESTLE	Political, Economic, Social, Technological, Legal and Environmental analysis used to determine external issues.

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PD	Project Director
PIC	Person in Charge
SHO	Safety & Health Officer
SWOT	Strengths, Weaknesses, Opportunities and Threats analysis used to determine internal issues
ST	Suruhanjaya Tenaga or Energy Commission Malaysia

Step	Activity	PIC	Cross Reference
1	<u>External Issues - PESTLE Methodology</u> The Company shall use PESTLE analysis to determine external conditions that may affect the OHSMS and its ability to prevent injury and ill health. Political considerations include national policy, government priorities, geopolitical instability, public infrastructure programmes and overseas country conditions. Economic considerations include inflation, foreign exchange movements, labour availability, financing conditions, supply chain capacity and commercial pressure that may influence resources or safe work planning. Social considerations include workforce demographics, language, culture, public expectations, community interfaces and worker wellbeing. Technological considerations include high-voltage technology, automation, digital engineering, clean manufacturing, data-centre systems, cyber-physical interfaces and changing competence needs. Legal considerations include amendments to occupational safety and health, electricity, construction, fire, environmental, employment and local authority requirements. Environmental considerations include climate change, extreme weather, heat stress, flooding, lightning, air quality, biodiversity constraints and the physical conditions of project locations.	IM	OHSMS-04B OHSMS-06J OHSMS-06K
2	ISO Manager (IM) shall coordinate a formal review at least annually and when a significant change occurs. Triggers include new legislation, entry into a new country or sector, acquisition or restructuring, a major incident, new technology, severe weather, material supply disruption, significant client requirements or changes in business strategy.	IM / SHO / HOD	OHSMS-04D OHSMS-06J OHSMS-09U

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Step	Activity	PIC	Cross Reference
	The review shall determine whether climate change is a relevant issue as required by ISO 45001:2018/Amd 1:2024. Significant outcomes shall be incorporated into the OHSMS scope, risk and opportunity registers, objectives, legal register, project safety plans, emergency response plans and management review inputs.		

External Issues	Risk Impact	Control Measures	PIC
Political Considerations			
Changes in Malaysian energy policy, national grid investment, public infrastructure priorities or approval processes may alter project locations, schedules and interfaces with utilities or government agencies. Overseas projects may also be affected by political instability, border restrictions or local security conditions.	Compressed mobilisation periods, unfamiliar sites or disrupted access can reduce time for risk assessment, competent-person deployment and emergency preparation. Political instability may expose employees to travel, security and evacuation risks.	The Business Development, Project and SHO functions shall conduct country and project due diligence before commitment. Mobilisation gates shall require approved HIRARC, legal and permit reviews, security assessments, emergency and evacuation arrangements and confirmation of competent resources before site work begins.	MD / ED / PD / SHO
Government expectations concerning local participation, foreign workers, work permits and localisation may affect the availability and composition of the project workforce.	Rapid replacement of unavailable personnel or increased reliance on inexperienced labour can weaken supervision, communication and control of high-risk M&E activities.	Human Resources and Project Management shall forecast workforce requirements, verify lawful employment and competency, plan succession and maintain adequate ratios of competent supervisors. Induction and task briefings shall be provided in languages and formats understood by workers.	HRM / PM / SHO
Economic Considerations			
Inflation, exchange-rate volatility and increases in the cost of copper, switchgear, transformers, specialist plant, personal protective equipment and competent labour may place pressure on project budgets.	Cost pressure can encourage delayed replacement, reduced maintenance, unsuitable substitution or insufficient safety resources which can increase electrical, lifting, fire and occupational health risk.	Tender reviews and project budgets shall identify safety-critical resources as protected requirements. Technical substitutions shall undergo engineering review, HIRARC and approval. Procurement shall verify conformity, certification and lifecycle support before purchase.	CFO / CM / PM

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External Issues	Risk Impact	Control Measures	PIC
Late payment, supply-chain disruption or extended equipment lead times may create programme compression and simultaneous operations during installation, testing and energisation.	Accelerated work can increase fatigue, overtime, congestion, interface failures and unauthorised deviation from approved methods or isolation arrangements.	Project controls shall use realistic programmes, change management and look-ahead risk reviews. Recovery plans shall preserve required supervision, rest periods, testing sequence, permit controls and hold points. Unsafe acceleration shall be escalated to Top Management and the client.	PD / PM / SHO
Social Considerations			
The Company's workforce may include employees, local subcontractors and overseas workers with different languages, literacy levels, safety cultures and experience of high-voltage or critical-environment work.	Important instructions may be misunderstood and workers may be reluctant to raise concerns or stop work. This can affect switching, lifting, confined-space, work-at-height and emergency activities.	Competency shall be verified in practice. Induction, toolbox talks, permits and emergency instructions shall use clear language, visual aids and interpreters where necessary. Worker consultation, confidential reporting and stop-work authority shall be actively supported.	HRM / SHO / PM
Public and stakeholder expectations for responsible corporate conduct are heightened because the Company is listed on Bursa Malaysia and works in communities, occupied buildings, manufacturing sites and essential infrastructure.	Failure to control noise, traffic, dust, public access or service interruption can harm persons, damage trust and trigger complaints, enforcement or loss of stakeholder confidence.	Projects shall identify community and occupier interfaces, establish traffic and access controls, communicate disruptive work, investigate complaints and report material OHS matters through appropriate governance channels.	MD / ESG / PM
Technological Considerations			
Rapid adoption of digital substations, intelligent protection systems, building automation, battery energy storage, data-centre technology and advanced manufacturing equipment changes the nature of M&E risk.	Workers may encounter unfamiliar energy sources, remote operation, automatic restart, software-controlled equipment, stored energy or incorrect configuration during installation, testing or maintenance.	Engineering and SHO reviews shall assess new technology before use. Manufacturers' information, competency training, controlled software and settings, functional testing, LOTO and authorised energisation procedures shall be established before operational release.	ED / EM / SHO

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External Issues	Risk Impact	Control Measures	PIC
Digital engineering, mobile inspection systems, drones, remote monitoring and electronic permit systems can strengthen visibility and control but may introduce data integrity, cyber-security and overreliance risks.	Incorrect or unavailable digital information can result in work on the wrong equipment, missed inspection findings or unsafe remote commands affecting workers and critical systems.	The Company shall control access, revision status, backups, cyber-security interfaces and verification of safety-critical digital information. Field personnel shall confirm equipment identity and physical conditions rather than relying solely on remote data.	IT / EM / PM
Legal Considerations			
Malaysia's occupational safety and health framework continues to develop including the Occupational Safety and Health Act 1994 as amended in 2022 and the Occupational Safety and Health (Construction Work) (Design and Management) Regulations 2024.	Failure to recognise new duties, appointments, design-stage risk obligations or notification requirements can expose workers to uncontrolled hazards and expose the Company or its officers to enforcement.	The Legal Requirements Officer (LRO) and Head of SHO shall monitor amendments, maintain the legal register, evaluate compliance and brief affected functions. Project procedures, appointments, design reviews, records and training shall be updated before the applicable requirements take effect.	LRO / SHO / IM
High-voltage and low-voltage work is subject to the Electricity Supply Act 1990, Electricity Regulations 1994 and requirements administered by Suruhanjaya Tenaga together with utility and client rules.	Work performed without the correct competent person, switching control, isolation, test equipment, certification or statutory inspection can cause fatal electric shock, arc flash, fire or network disturbance.	Only appropriately registered or authorised competent persons shall control regulated work. The Company shall verify registrations and renewals, maintain electrical safety rules, approve switching programmes, apply LOTO, test for dead and control energisation and handover.	EM / CP / SHO
Environmental Considerations			
Climate change is relevant because extreme rainfall, flash flooding, heat, lightning, haze, high winds and changing weather patterns can affect outdoor substations, excavations, lifting, work	Severe weather may cause heat illness, reduced concentration, slope or excavation failure, crane instability, lightning exposure, flooding, electrical ingress, access disruption and delayed emergency response.	Project HIRARC and emergency plans shall use location-specific weather and flood information. Work-rest regimes, hydration, shaded recovery areas, lightning and wind limits, drainage, flood protection, equipment ingress protection,	PM / SHO / ERT

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External Issues	Risk Impact	Control Measures	PIC
at height, temporary power and worker health.		emergency communications and stop-work criteria shall be established and monitored.	
Projects in green plants, industrial areas, sensitive manufacturing environments and overseas locations may involve chemicals, emissions, contaminated land, restricted discharge and specialised waste controls.	Unplanned releases or exposure can cause acute injury, occupational illness, fire, evacuation, contamination or regulatory action.	Chemical registers, safety data sheets, exposure assessments, storage compatibility, ventilation, spill response, waste controls and medical surveillance shall be established as applicable. Local environmental and occupational health requirements shall be integrated into project plans.	SHO / PM / Store

Step	Activity	PIC	Cross Reference
3	Internal Issues - SWOT Methodology The Company shall use SWOT analysis to determine internal matters that can support or hinder the intended outcomes of the OHSMS. Strengths are existing capabilities, resources, experience or cultural characteristics that improve occupational health and safety performance. Weaknesses are internal limitations, gaps or inconsistencies that can increase risk or reduce the effectiveness of controls. Opportunities are practical improvements that the Company can pursue through investment, innovation, competence development or process integration. Threats are internal vulnerabilities or foreseeable business conditions that could adversely affect workers, legal compliance or OHSMS performance if they are not managed.	IM	OHSMS-04B OHSMS-06J
4	Internal issues shall be reviewed using evidence from incidents, near misses, HIRARC, worker consultation, competency assessments, inspections, audits, compliance evaluations, tender and project reviews, absenteeism, occupational health information and management review. The assessment shall consider corporate governance, leadership, organisational structure, resources, competence, culture, communication, knowledge, technology, contractor control and operational performance. Significant matters shall be assigned to a responsible owner with appropriate controls, objectives or improvement actions.	IM / SHO / Process Owners	OHSMS-05I OHSMS-09S OHSMS-09U

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Internal Issues	Risk Impact	Control Measures	PIC
Strengths Considerations			
The Company has extensive multidisciplinary experience in complex M&E engineering and contracting including 132 kV substations, 33/11 kV systems, industrial plants, manufacturing facilities and data centres.	Complex experience supports reliable hazard recognition and technical decision-making but knowledge can be lost if it remains concentrated in a small number of senior personnel.	The Company shall capture lessons, standardise critical controls, maintain technical authorities and mentoring arrangements and ensure that project teams have access to current engineering and SHO knowledge.	ED / SHO / PM
As a Bursa Malaysia Main Market listed organisation the Company has established governance, board oversight, structured reporting and access to corporate resources.	Strong governance can support OHSMS accountability and investment but excessive reliance on corporate reporting may obscure workplace conditions if leading indicators are weak.	Board and management reporting shall combine lagging results with critical-control verification, worker concerns, high-potential events, legal compliance and overdue actions. Management shall verify conditions through site engagement and assurance reviews.	MD / Board / SHO
The Company employs or engages competent engineers, chargemen, wiremen, safety and health personnel and specialist subcontractors for regulated and high-risk work.	Competent personnel strengthen control but shortages, competing assignments or expired registrations can leave projects without adequate technical authority or supervision.	A central competency and appointment register shall track qualifications, experience, authorisations, deployment and expiry dates. Mobilisation shall be prohibited when mandatory competency or supervision is unavailable.	HRM / EM / SHO
Weaknesses Considerations			
Operations are dispersed across multiple projects, sectors, client systems and overseas locations with different levels of maturity and supervision.	Inconsistent application of corporate procedures can lead to varying standards for HIRARC, permit-to-work, LOTO, lifting, incident reporting and contractor control.	The Company shall define non-negotiable critical controls, conduct risk-based project assurance, provide standard templates and verify implementation through inspections, audits, management visits and performance reviews.	PD / SHO / IM



Internal Issues	Risk Impact	Control Measures	PIC
Project delivery can depend heavily on subcontractors and labour supplied through several tiers.	Limited visibility of lower-tier competency, equipment condition and employment practices can create unsafe acts, poor reporting, fatigue or noncompliance.	Prequalification shall extend to safety capability, legal status, past performance and proposed resources. Contracts shall prohibit unauthorised subcontracting. Site supervision, induction, competency verification and periodic evaluation shall cover every tier.	CM / PM / SHO
Commercial pressure, variations, delayed approvals and recovery programmes can create long working hours and overlapping activities.	Fatigue, reduced attention, congestion and rushed decisions can increase electrical switching errors, dropped objects, vehicle incidents and poor-quality risk assessment.	Project change and recovery plans shall assess fatigue and simultaneous operations. Working hours, rest, supervision and sequencing shall be controlled. Safety-critical hold points shall not be removed solely to recover time or cost.	PD / PM / HRM
Opportunities Considerations			
Digital inspection, mobile reporting, building information modelling and central performance dashboards can improve real-time visibility of hazards and corrective actions.	Well-designed systems can strengthen learning and management response but ineffective configuration may produce excessive data without meaningful risk control.	The Company shall prioritise high-potential risk information, use controlled data fields, assign action ownership and verify closure. Digital tools shall be piloted with workers and integrated with site verification and management review.	IT / SHO / IM
Growth in data centres, green plants, advanced manufacturing and utility infrastructure provides an opportunity to embed safety through design and lifecycle engineering.	Early design decisions can eliminate work at height, reduce manual handling, improve maintainability and prevent exposure during testing or future servicing.	Design reviews shall include construction, commissioning, operation and maintenance hazards. The project team shall record design risk decisions and consult installers, maintainers, client representatives and competent persons before design release.	ED / Design / SHO
The Company can develop internal specialist capability in high-voltage safety, arc-flash assessment, lifting engineering, confined-space rescue, occupational hygiene and human factors.	Greater internal capability can reduce reliance on external availability and improve the quality of risk decisions across projects.	A multi-year competency plan shall identify critical technical and SHO disciplines, succession needs, training pathways and practical assessment. Competent specialists shall support peer reviews and internal learning.	HRM / ED / SHO

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Internal Issues	Risk Impact	Control Measures	PIC
Threats Considerations			
Loss of experienced engineers, competent electrical persons, supervisors or SHO personnel can reduce organisational knowledge and increase workload on remaining staff.	Vacancies or rapid replacement can weaken review quality, statutory coverage, worker consultation and direct supervision of high-risk work.	Succession planning, competitive retention, knowledge transfer, deputy appointments and resource forecasting shall be maintained. Exit information and project lessons shall be captured before key personnel leave where practicable.	MD / HRM / SHO
Weak reporting culture or fear of blame can cause hazards, near misses, fatigue and procedural deviations to remain hidden.	Management may receive an inaccurate picture of risk and corrective action may occur only after a serious incident.	Leaders shall promote fair and learning-focused reporting, protect good-faith reporters, consult workers without retaliation and recognise proactive intervention. Investigations shall address system causes while preserving accountability for deliberate misconduct.	MD / SHO / PM
Inadequate control of drawings, settings, software, single-line diagrams, method statements or permit records can expose workers to incorrect system information.	Use of obsolete or unverified information can cause wrong isolation, incorrect protection settings, unplanned energisation or unsafe testing and maintenance.	Documented information shall be approved, revision controlled and available at the point of use. Safety-critical documents shall be independently verified where required and obsolete copies shall be removed or clearly prevented from unintended use.	IM / EM / PM

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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