# **Kelington Group Berhad**

[Company No. 199901026486 (501386-P)]

### **Human Rights Policy**

#### **1. INTRODUCTION**

This Human Rights Policy outlines standard to ensure that all employees are treated with respect and dignity. Kelington Group Berhad and its group of companies ("the Group") are committed to respect and support the protection of human rights of our employees and stakeholders during the conduct of our business. We endeavor to operate in an ethical and responsible manner, comply to the relevant local government rules and regulations, and to prevent human rights violations in our business operations.

#### 2. OBJECTIVE

This Human Rights Policy ("the Policy") provides the guiding principles for the employees and vendors to ensure that they adhere to the basic human rights and values during their engagement with the Group. This policy is written in accordance to the principles as laid out in the International Bill of Human Rights as well as the UN Guiding Principles on Business and Human Rights.

#### 3. PRINCIPLES

#### 3.1 Diversity and Inclusion

We advocate diversity and inclusive culture in our workplace base on mutual trust and respect.

We do not tolerate any form of harassment and unlawful discrimination, abuse or intimidation based on any personal characteristic such as race, gender, national or social origin, ethnicity, religion, age, disability, sexual orientation, disease, marital status (including pregnancy), political opinion or any other status protected by applicable law.

The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience.

Harsh or inhumane treatment is not tolerated, including all type of harassment (sexual/physical/verbal), sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of employees, nor is there to be the threat of any such treatment.

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Employees shall strive to maintain healthy, safe and productive work environment by adhering to the highest standard of professional conduct. They should in all respect and at all time, conduct themselves with honesty, propriety and must not in any circumstances, commit any act that would bring damage to the Company, its employees, property, reputation or general interest.

# 3.2 Child Labor

We are committed of not hiring individual who is below the age of 18 years old as employee in our business operations.

#### 3.3 Forced Labor

We are committed of not using any person who has not offered himself/herself voluntarily for the work or service. We prohibit the use of all form of forced (working under threat of penalty) labor, including prison labor, bonded labor, indentured (forced to pay off debt) labor, military labor, slavery, human trafficking and sexual exploitation of persons.

#### 3.4 Minimum Wages, Working Hours and Benefits

We compensate employees with full compliance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Working hours shall be limited to what is acceptable by local laws.

#### 3.5 Dealing with Management, Freedom of Association and Collective Bargaining

We believe that employees' rights are the best protected by allowing each employee to deal directly with management on issues of importance to that employee. We also respect the rights of employees to associate or not associate with third-party organizations, join or not join labor unions, seek representation, bargain or not bargain collectively in accordance with local laws.

#### 3.6 Communication and Managing Grievances

We place importance on creating open and honest communications among all employees through company-based grievance mechanisms. We engage in constant communication with our employees and stakeholders, and resolve complaints and grievances brought up by them through an open, transparent and consultative process. We commit to remedy the affected parties should the issues raised are proven to affect the and contribute to human rights impact. We continue to build the awareness and knowledge of our employees on human rights, including labour rights, encouraging them to speak up, without retribution, about any concern they may have, including through our grievance channels.

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#### 3.7 Safety and Health

We are committed to provide a healthy, safe and productive workplace for our employees and stakeholders by minimizing the health, safety and environmental risks and comply with applicable safety and health laws and regulations, as well as internal requirements. The Group has adopted a Safety and Health Policy and Environmental Policy that governs our HSE practices to achieve these objectives.

#### 3.8 Community Rights

We respect the rights of the surrounding community in the locations that we operate. We endeavor to identify any potential impacts that may arise from our operations and take appropriate steps to mitigate them. We seek to assist the community in accordance to the principles as stated in our Community Investment Policy.

## 4. REPORTING OF VIOLATIONS OF THE POLICY

Any employee or stakeholder who knows of, or suspects, a violation of this Policy, is encouraged to whistle blow or report the concerns through the whistle blowing mechanism as stated in our Whistle Blowing Policy. Should the needs arise, the anonymity of the individuals who report the concerns will be guaranteed.

#### 5. APPLICABILITY

The Policy is applicable to all employees, suppliers, subcontractors and service providers of the Group.

#### 6. COMPLIANCE AND REVIEW OF THE POLICY

The Group COO is assigned to oversee the implementation of this policy and will report the compliance status to the Board twice a year. The Board will review the adequacy of the Policy regularly and amend it should the needs arise.

