



GHL Systems Berhad (199401007361)

Incorporated in Malaysia

LABOUR & HUMAN RIGHTS GROUP POLICY

28 November 2022 (Version 2)

1. INTRODUCTION

GHL Systems Berhad and its subsidiaries (“GHL Group”) believes in respecting human rights as engrained in the contents of our Code of Ethics and Conduct. Our employees are of great value and a major key asset to the success of GHL Group. GHL Group always strive to provide a workplace where employees can fulfil their true potential in an open and inspirational working environment based on meritocracy. This Labour & Human Rights Policy (“Policy”) highlights our understanding of the fundamental rights of all human beings and our strong commitment to high standards that deliver a fair, respectable and safe workplace for all our employees.

The purpose of this Policy is to define the labour and human rights standards in accordance with applicable laws of the respective countries in which we operate and as much as possible in accordance with international standards, including the United Nations Universal Declaration of Human Rights, as well as the United Nations Guiding Principles on Business and Human Rights (“UNGP”), United Nations Global Compact, and the International Bill of Human Rights and The International Labor Organization’s Declaration on Fundamental Principles and Rights at Work to which all employees in GHL Group are entitled for.

2. SCOPE

This Policy applies globally to the management, employees and contract workers of all entities in GHL Group. We also encourage other third parties who deal with GHL Group in the conduct of its day-to-day operations to abide by these requirements.

3. REQUIREMENTS

A. NON-DISCRIMINATION

- A.1. GHL Group does not tolerate any form of discrimination against our employees based on race, colour, gender, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability, or other distinguishing characteristics.
- A.2. Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful and non-discriminatory criteria.

B. WORKPLACE SAFETY AND HEALTH

- B.1. Through the Occupational Health, Safety and Environment Policy, GHL Group is committed to providing and maintaining a safe and healthy workplace and a sustainable environment by adhering to applicable legal requirements, international best practices, and the organization’s compliance obligations. The primary focus is on internalisation and engagement with our employees.

C. FORCED LABOUR

- C.1. GHL Group does not tolerate any form of forced labour including bonded labour, indentured labour and slavery or human trafficking. Employees must be allowed to move around freely and leave their place of work when their working hours end.

D. CHILD LABOUR

D.1. GHL Group does not tolerate the hiring of child labour under any circumstances. The minimum age for full-time employment must be 18 or the legal minimum age for employment under the applicable laws, whichever is higher. GHL Group shall as far as practicable ensure that all they will only conduct business with the supply chains that practices this particular policy strictly.

E. WORKPLACE SECURITY

E.1. GHL Group must at all material times protect their employees from any acts of physical, verbal, sexual or psychological harassment, bullying, abuse or threats or violence in the workplace by either their fellow employees, managers or senior management and directors.

F. WORKING HOURS, BENEFITS AND WAGES

- F.1.** GHL Group must adhere to the applicable laws or industry standards, relating to minimum wages, working hours, overtime and benefits.
- F.2.** Employees must not be required to work more than eight (8) hours a day exclusive of the one (1) hour lunch break (“normal hours”).
- F.3.** Notwithstanding Paragraph 3F.2 above, if the employee is required to work overtime which is defined as hours in excess of the normal hours, the said employee must be paid promptly in accordance with the applicable laws of the respective countries.
- F.4.** GHL Group is committed to continuously develop employee skills and capabilities, and to provide opportunities for career advancement.
- F.5.** In the event of major layoffs, GHL Group must, as a minimum, satisfy applicable laws and industry standards.

G. LEAVE

G.1. GHL Group must ensure that all employees have the right to annual and medical leaves, as well as parental leave for employees who have to care for a new-born or newly adopted child as provided by the applicable Laws.

H. EMPLOYEE CONTRACTS/LETTERS

H.1. All employees must be provided with a written, understandable and legally binding employment contract/letter.

I. PRIVACY AND PERSONAL INFORMATION

I.1. GHL Group respects the privacy of individuals and will use all reasonable care to maintain the privacy and confidentiality of personal data. GHL Group complies with the applicable laws related to the protection of personal information and does not tolerate unauthorized disclosure of or access to such data.

4. REPORTING AND WHISTLEBLOWING

Reporting and whistleblowing are made available via GHL Group’s Whistleblower Policy. Whistleblowers are advised to seek this channel to declare serious and significant matters that they believe may be menacing to

GHL Group's interest. Whistleblower complaint that is genuine will be fully protected and his/her identity is fully safeguarded.

Any complaint or report on human rights and labour standards infringement can be made to <mailto:wb@whistleblowerghl.com>.

5. POLICY REVIEW AND MONITORING

The Executive Management in coordination with the Legal, Compliance and Human Resources will periodically assess and monitor the effectiveness of this Policy and will be updated in accordance with the needs of GHL Group and any new regulations.

Approved by the Group Chief Executive Officer on 28th November 2022

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