

GLENEALY PLANTATIONS SDN BHD

Anti-Harassment & Anti-Discrimination Policy

1. Policy Purpose

- 1.1 Glenealy Plantations Sdn Bhd (GPSB) and its subsidiaries (“the “Group”) are committed to building a safe environment for all of its Employees free from discrimination on any grounds and from harassment at work. The Group takes a zero tolerance of any form of discrimination and harassment, in which all individuals are treated with respect and dignity.
- 1.2 The Policy aims to prevent discrimination and harassment at the workplace based on race, colour, religion, gender, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other characteristic protected by law.

2. Application

- 2.1 This Policy applies to:
- GPSB Group and its subsidiaries where GPSB Group or its subsidiaries have management control;
 - All Employees (as defined in Paragraph 3); and
 - Third Parties (as defined in Paragraph 3 below).
- 2.2 The Group considers a contravention of this Policy to be a serious violation, which may result in disciplinary action. The disciplinary action could extend to the dismissal of an Employee in appropriate circumstances, or the termination of the business relationship with a Third Party who may have violated the Policy.
- 2.3 Such flagged conduct is neither tolerated in the workplace nor in any work-related setting outside the workplace (such as business trips, business meetings). Appropriate disciplinary action will be taken against the offender.
- 2.4 Reportable incidents for Harassment and Discrimination include, but are not limited to the following:
- Threatening, abusive or insulting language, comments or other non-verbal offensive gestures;
 - Sexual harassments such as unwanted physical contact, distribution or display of written or graphic material, other media content that are sexually suggestive or offensive, making unsolicited advances towards the same or opposite sex;
 - Humiliation and intimidation, such as cyber bullying and abuse of power;
 - Discrimination on the basis of gender, race and disabilities.

2.5 Interactions between Employees are considered acceptable in the workplace, insofar as they are professional, mutually respectful and non-coercive in nature.

3. Definition

3.1 “**Discrimination**” refers to either a group practice or an act committed by a single party, as long as the basis of that discriminatory treatment is, in whole or in part, the person’s race, colour, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information or marital status. Such violations may be made manifest in the following scenarios:

- Creation of discriminatory work conditions;
- Use of discriminatory evaluative standards in employment to assess performance.

3.2 “**Harassment**”, which includes sexual harassment, refers to as any verbal or physical conduct designed to threaten, intimidate or coerce an Employee, co-worker, or any person working for or on behalf of the Group.

- Verbal harassment includes offensive or unwelcome comments regarding a person’s national origin, race, colour, religion, gender, sexual orientation, age, body, disability or appearance, as well as slurs and negative stereotyping.
- Non-verbal harassment includes the distribution, display or discussion of written or graphic material that allude to hostility or aversion toward an individual because of his or her race, colour, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates;
- Sexual harassment may refer to any unwanted conduct of a sexual nature, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive or humiliating or is a threat to his well-being arising out of and in the course of the Employee’s employment.

3.3 “**Employees**” refer to individuals working at all levels and grades, including senior managers, officers, nominees, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, casual workers and agency staff, of The Business, wherever located (collectively referred to as employees in this policy) and directors. This includes employees on secondment to joint ventures, affiliates or associates.

3.4 “**Third Parties**” refers to any outside party acting on behalf of the Group and its subsidiaries. They consist of but may not be limited to the following: agents, consultants, suppliers, distributors, teaming partners, contractors, joint-venture partners and certain vendors.

4. Guidance

Disclosure of Relationships at Work

4.1 The Group does not condone relationships that result in any conflict of interest or perception of such conflicts, including romantic relationships between a supervisor and subordinate. Such relationships may give rise to potential bias, favoritism, intimidation, coercion or exploitation,

which undermines the spirit of trust and mutual respect that is essential to a healthy work environment.

4.2 Should a personal relationship develop in the course of time between a supervisor and subordinate, this personal relationship must be disclosed to the Head of Division. The Head of Division, in consultation with Human Resources Department, will decide on the next course of action to ensure that no conflict of interest arises from the personal relationship.

Reporting Mechanisms

4.3 In order to create a safe environment for reporting without fear of negative repercussions, all incident reporting and investigation procedures should be treated with confidentiality, and all information is disclosed strictly on a need-to-know basis.

- Multiple reporting channels have been established to encourage Employees to speak up about their discomfort and concerns. It can also include a higher authority or neutral party within the organization such as the Group's [Human Resource Department] in case the offender is his/her immediate supervisor.
- An anonymous whistle blowing channel is also available for reporting such incidences. For more information on the reporting protocol, please refer to the [Whistle Blowing Policy / Grievance Handling Procedure].

Safeguards

4.4 The Group prohibits retaliation against any individual who reports in good faith on instances of discrimination or harassment, or participates in an investigation of such reports.

4.5 Notwithstanding, appropriate actions, including making police reports, will be taken against parties who make allegations frivolously, maliciously, or for personal gain.

Complaints Handling

4.6 All incidents and allegations of Discrimination and Harassment will be promptly investigated.

4.7 Specifically for sexual harassment allegations, the Group is committed to investigating and reporting to the complainant not later than thirty days after the date of the receipt of complaint.

4.8 If a violation has occurred or the allegations of Discrimination and/or Harassment is substantiated, appropriate disciplinary action, including dismissal, shall be taken.

5. Administration

Communications and Training

5.1 Principles and procedures of the Anti-Harassment and Anti-Discrimination Policy will be communicated to all relevant stakeholders at the outset and as appropriate thereafter.

5.2 There should be adequate training for supervisors, line managers, management and any other designated staff (i.e. HR) to manage employee feedback, grievance, as well as handle harassment cases when they occur.

Policy Review

5.3 The Anti-Harassment and Anti-Discrimination Policy shall be reviewed once every two years, where the Group may modify this Policy to maintain compliance with applicable laws and regulations or accommodate organisational changes. This review should be carried out by Head of Human Resources.

6. References

6.1 Malaysian Employment Act, 1955

6.2 Malaysian Employment Act (Amendment), 2012

6.3 ILO Discrimination (Employment and Occupation) Convention, (1958) No. 111

6.4 GPSB Group's Whistle Blower Policy

7. Policy Distribution

7.1 All Employees in GPSB Group.

Date: 01 Feb 2021