

GLENEALY PLANTATIONS SDN BHD

Human Rights Policy

1. Policy Purpose

1.1 The Company and its subsidiaries (“the Group”) have the responsibility to respect, support and uphold fundamental human rights as expressed in the Universal Declaration for Human Rights. A reference to the Company shall mean any company within the Group as the context required. This policy is subject to amendment from time to time.

1.2 This policy is part of the Group’s commitment to upholding human rights and dignity. This policy is supported by other policies on key human rights aspects, such as:

- Health and Safety Policy
- Whistle Blowing Policy
- Anti-Harassment and Anti-Discrimination Policy
- Anti-Bribery and Anti-Corruption Policy

2. Application

2.1 This policy applies to:

- The Group;
- All employees 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 Group, wherever located (collectively referred to as **employees** in this policy) and directors. This includes employees on secondment to joint ventures, affiliates or associates; and
- Third Party (as defined in Paragraph 3.1 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.

3. Definition

- 3.1 **“Third Party”** refers to any outside party acting on behalf of the Group, any individual or organization the employees or directors come into contact with during the course of the employees’ or the directors’ work or dealings for the Group. These include actual and potential clients, customers, suppliers, contractors, subcontractors, consultants, any parties engaged or has the intention to be engaged with the Group, distributors, business contacts, agents, advisers, and any political party, official of a political party, or candidate for public office, and governmental officials and public bodies, including the directors, officers, and employees of government-owned and government-controlled companies and public international organizations and anyone who holds a legislative, administrative or judicial decision of any kind (whether appointed or elected) or who exercises a public function for or on behalf of a country or territory or any public agency or public enterprise) as well as their respective advisors, agents and representatives.”
- 3.2 **“Forced or Bonded Labour”** refers to work that is performed involuntarily and under the menace of any penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.
- 3.3 **“Child Labour”** refers to work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It includes work that is mentally, physically, socially, or morally dangerous and harmful to children, and interferes with their schooling.
- 3.4 **“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.
- 3.5 **“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.
- 3.6 **“Improper Conduct(s)”** mean any malpractices, wrongdoings, irregularities and/or suspicious conducts, which if proven, constitutes an act of misconduct under the Group’s **Anti-Bribery and Anti-Corruption Policy** and/or any other internal policies in place and/or any criminal offence under the applicable laws in force.
- 3.7 **“Employee Grievance”** refers to any complaint, discontent or dissatisfaction whether expressed or not and whether valid or not, arising out of anything connected with the terms and conditions of employment and any matter arising out of the conduct and supervision of work at the workplace which an employee thinks, believes or feels is unfair, unjust or inequitable

4. Guidance

Rights of Employees

- 4.1 The Group commits to ensuring that the rights of all employees working in any of the Group's workplaces are respected and complies with relevant labour law and regulations.
- 4.2 The Group does not condone the use of Forced or Bonded Labour or human trafficking. The Group commits to implementing the appropriate measures to prevent the use of such labour. In the event Forced or Bonded Labour is uncovered, the Group shall employ remedial actions to ensure that victims are referred to rehabilitation services for support.
- 4.3 The Group respects all employees' right to freedom of association by forming or joining trade unions in the industry that they are in, to bargain collectively. The Group shall ensure the independence of trade unions.
- 4.4 The Group does not condone Child Labour and will not hire any underage person as an employee (in compliance with relevant laws on Child Labour).
- 4.5 The Group shall ensure the health and safety of all its employees and Third Party working within its operations, are in accordance to requirements of OSHA 1994 and the Group's Health and Safety Policy.
- 4.6 The Group is committed to providing equal opportunity for employment and prohibits any form of Discrimination based upon religion, race, gender, national, and age.
- 4.7 The Group also adopts a zero tolerance stand towards any type of Harassment, or Improper Conduct(s).
- 4.8 The Group commits to payment of minimum wage according to the local legal requirements. The Group will use market and industry standards to apply fair wages where no wage law is in existence.
- 4.9 The Group abides by local working hour laws including local statutory limits on weekly hours worked. All overtime and/or statutory holiday hours are administered fairly, paid correctly, and compliant with applicable employment standards legislation for the purposes of overtime pay.

Rights of Indigenous and Local Communities

- 4.10 The Group commits to respect the rights of indigenous and local communities in areas of operation and to resolve social conflict through good practices.
- 4.11 The Group respects legal and customary land tenure rights of the indigenous and local communities, as well as their right to give or withhold their Free, Prior and Informed Consent, where applicable. The Community Engagement is a process without pressure and intimidation (free), which is performed before the activity that affects the community is undertaken (prior),

with the possession of full and accurate knowledge about the activity and its impact on the community (informed), so that the community can either provide or withhold its permission over the activity (consent).

4.12 The Group is committed to the inclusion of third-party suppliers and improving their livelihoods through fair and transparent partnerships.

Grievance Handling

4.13 The Group is also committed to handling any Employee Grievance promptly through a transparent and objective process, per the Procedure on Employees' Grievance Resolution.

4.14 For complaints involving external parties, the Group has established Guidelines on Conflict Resolution to help resolve any conflict occurrence with local communities due to impact from oil palm operations. It also has a Complaint and Grievances Procedure to address complaints related to estate operations, social, environmental, occupational health and safety issues.

Supplier Compliance

4.15 The Group maintains the right to conduct third-party due diligence before entering into a business partnership with a Third Party. The Group will only associate with Third Party with good human rights track record.

5. Administration

Communications and Training

5.1 Training on this policy forms part of the induction process for all new employees and directors. All existing employees and directors will receive regular, relevant trainings on how to implement and adhere to this policy and the applicable laws. This policy shall be communicated to all relevant stakeholders, and they are expected to conform to the spirit and intent of the above guiding principles, where applicable.

Policy Review

5.2 This policy may be reviewed annually or such other intervals as the Group deems necessary, where the Group may modify this policy to maintain compliance with applicable laws and regulations or accommodate organizational changes. This review should be carried out by the Head of Human Resources. All employees and directors shall be responsible to check for any updates on the Group's website from time to time at www.glenealyplantations.com.my

6. References

6.1 Malaysian Anti-Trafficking in Persons and Anti-Smuggling of Migrants Act, 2007

6.2 Malaysian Occupational Safety and Health Act, 1994

6.3 Malaysian Employment Act, 1955

6.4 The United Nations (UN) Universal Declaration of Human Rights

6.5 ILO Convention of Forced Labour No. 29

6.6 ILO Convention of Child Labour No. 138 and 182

6.7 ILO Convention of Indigenous and Tribal Peoples No. 169

6.8 The Group's Grievance Handling Procedure

7. Policy Distribution

7.1 All Employees in the Group

7.2 Third Party

Date: 01 May 2021