



**DELEUM**

## **INTEGRATED MANAGEMENT SYSTEM**

### **DELEUM GROUP's HUMAN RIGHTS AND LABOUR STANDARDS**

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## **1.0 OBJECTIVE**

Deleum is committed to respecting all internationally recognised human rights and to complying with all applicable laws and the labour standards in all locations in which we operate.

## **2.0 SCOPE**

These principles apply to all directors, officers and employees of Deleum (permanent, contract, secondment to work in other organizations, employees on probation and to those undergoing internship with Deleum). All applicable laws, health, safety and environmental standards are carefully observed to ensure a conducive working environment.

Third parties that may perform works or services for or on behalf of Deleum and joint venture companies in which Deleum is not a controlling stakeholder and associate companies of Deleum are encouraged to adopt these principles and standards.

The information is accessible through Deleum Intranet and Deleum's corporate website.

## **3.0 PRINCIPLES**

### **3.1 CHILD LABOUR**

3.1.1 Deleum acknowledges that every child has the rights to education, recreation, safe living standards and protection against any harm. Deleum will not tolerate the use of a child nor exploitation of children in any of our areas of operations.

3.1.2 Deleum has adopted the following principles to reinforce its core value of treating all children and "young person" with dignity and respect. For the purposes of these principles, a "child" or "young person" is anyone at the minimum age permitted under applicable law.

- a. Deleum will not provide employment for children or "young person".
- b. Deleum will not tolerate the exploitation of children, and the physical punishment, abuse, or involuntary servitude of any worker.



- c. Deleum expects the third-party suppliers & contractors with whom we do business with, to uphold the same standards. Should a pattern of violation of these principles become known to Deleum and not be rectified within a reasonable period, Deleum shall discontinue the business relationship.
- d. Deleum supports temporary workplace internship programs provided that such person is closely supervised, and their moral, safety, health and compulsory education are not compromised in any way.

## **3.2 FORCED LABOUR**

- 3.2.1 Deleum acknowledges that all employees have the rights to enter employment with Deleum on voluntary basis and will not make use of forced labour in any of our areas of operations. All employees shall have the freedom to enter an employment voluntarily and freely, without the threat of any penalty. This is applicable to all personnel including interns, consultants and any other persons (collectively referred to as “persons”) representing Deleum.
- 3.2.2 Employees shall have the freedom to terminate employment of indefinite or long duration by means of notice of reasonable length in accordance with applicable law or mutual agreement, at any time.
- 3.2.3 Deleum recognises the responsibility that it shares with suppliers, vendors, and sub-contractors (collectively referred to as “suppliers”) to address forced labour. This principle represents a clear contractual obligation as a condition for any business relationship with Deleum.

## **3.3 LABOUR RIGHTS**

- 3.3.1 By upholding the rights and welfare of their employees and persons through compliance with all applicable laws and agreements related to compensation and working conditions. This includes adherence to minimum wage, overtime pay, legally mandated benefits, and the maximum number of working hours.
- 3.3.2 Suppliers must also respect local laws or collective agreements, ensuring that their operations do not exploit employees and persons.



### **3.4 RIGHT TO FREEDOM OF ASSOCIATION**

- 3.4.1 Deleum follows local labour laws pertaining to freedom of association. Deleum is not a unionized organization but respects the legal rights of employees to become members of a labour union.
- 3.4.2 Deleum is committed to treating everyone with dignity and respect by ensuring that our suppliers commit to the same.

### **3.5 WORKFORCE DIVERSITY, EQUITY AND INCLUSION, OR NON-DISCRIMINATION**

- 3.5.1 At Deleum, we are passionate about developing a diverse workforce. We do not engage in any form of unlawful discrimination and committed to provide fair and equal opportunity in employment practices regardless of race or ethnicity, skin colour, religion, sex or gender, sexual orientation, family, marital or social status, pregnancy, age, place of origin, ancestry, culture, mental or physical disability, genetic information, economic or financial background, power disparity, political affiliation or any other characteristic unrelated to the performance of the job.
- 3.5.2 The diversity, equity and inclusion (DEI) apply to all aspects of the relationship between Deleum and its employees, which include hiring practices, promotions, internal transfers, learning and development opportunities, compensation and employee benefits.
- 3.5.3 The DEI principles also apply to the selection and treatment of suppliers and any other persons or firms doing business for or with Deleum.

### **3.6 HUMANE TREATMENT**

- 3.6.1 At Deleum, we are committed to respect rights of employee and persons, and ensuring no harsh and inhumane treatment, including any form of mental or physical coercion, or verbal abuse of employee and persons and ensuring that our suppliers commit to the same.



### 3.7 HARASSMENT & BULLYING PROHIBITED

- 3.7.1 Deleum is committed in making sure that the working environment is a great place to work, healthy and free of harassment or bullying of any kind for all employees from diverse background. Every individual protects and treats each other with dignity and supports an inclusive workplace that promotes diverse, uniquely talented employees to drive innovation.
- 3.7.2 Any type of verbal or physical harassment or bullying that disrupts or interferes with another's work environment, or which creates an intimidating, offensive, hostile work or non-educational environment will not be tolerated. This includes employees, interns, and any other person doing business for or with Deleum.
- 3.7.3 Everyone is responsible for ensuring that our work environment is safe and free of hostility. All Deleum employees should be a role-model, respectful, courteous and has an inclusive behaviour.
- 3.7.4 Deleum does not subject anyone to a behaviour that makes them feel vulnerable, humiliated, undermined, threatened, or degraded.
- 3.7.5 Legitimate, reasonable and constructive assessment of performance or conduct is not itself, bullying or harassment.
- 3.7.6 Harassment includes unwelcome conduct that is based on race or ethnicity, skin colour, religion, sex or gender, sexual orientation, family, marital or social status, pregnancy, age, place of origin, ancestry, culture, mental or physical disability, genetic information, economic or financial background, power disparity, political affiliation or any other characteristic protected by law. Harassment becomes unlawful where:
  - a. Enduring the offensive conduct becomes a condition of continued employment, or
  - b. The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.
- 3.7.7 Deleum investigates all complaints of harassment & bullying promptly and fairly, and, when appropriate, takes immediate corrective action to stop and prevent these provocations from recurring.



### 3.8 SEXUAL HARASSMENT

- 3.8.1 It is each employee, persons or suppliers' responsibility to maintain a workplace environment free from sexual harassment.
- 3.8.2 Examples of verbal or physical conduct include, but not limited to:
- a. physical assault;
  - b. direct or implied threats that submission to sexual advances will be a condition of employment, work status, promotion, job levels, letters of recommendation, or salary;
  - c. a pattern of conduct that would or is intended to cause discomfort or humiliation; comments of a sexual nature; sexually explicit verbal or written statements, questions, jokes, or anecdotes; propositions of a sexual nature; subtle pressure for sexual activity; touching, patting, hugging, brushing against a person's body; remarks about sexual activity, experience, or orientation; displays of inappropriate sexually oriented material; repeated or unwanted staring; impeding or blocking movement; gesturing;
  - d. continuing to express sexual or social interest after being informed directly that the interest is unwelcome.
  - e. submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals.
  - f. such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.
- 3.8.3 Violation of this principle will be treated as serious misconduct. No employee or persons shall be subjected to retaliation for any good faith report of sexual harassment or for participating in an investigation.
- 3.8.4 Deleum investigates all complaints of harassment promptly and fairly, and, when appropriate, takes immediate corrective action to stop and prevent the harassment from recurring.



## **4.0 REMEDIATION**

Violations of Human Rights & Labour Standards, regardless of whether an actual law has been violated, will not be tolerated.

### **4.1 GRIEVANCES MECHANISM**

- 4.1.1 Deleum encourages employees, persons & suppliers to report any violations of these principles & standards to the Management through Deleum's guideline on Grievances and Disciplinary policy.
- 4.1.2 A formal complaint filed and received pursuant to this principle will be kept strictly confidential. Information acquired from the investigation will also be kept confidential. All parties involved in the investigation, including both the victim and the offender (alleged or otherwise), are required to keep such information confidential.
- 4.1.3 All reports will be thoroughly investigated which will be kept and treated confidentially. Deleum will promptly, thoroughly and fairly investigate every issue that is brought to its attention in this area and will take necessary actions.
- 4.1.4 Any form of retaliation toward an employee, persons, or suppliers who raises a concern about a violation of this principle or who participates in an investigation related to such a violation is strictly prohibited. Retaliation may include dismissal, demotion, unwanted transfer, denial of opportunities within Deleum, or any other adverse action taken as a result of the complaint or participation in the investigation.
- 4.1.5 Deleum is responsible for taking necessary action against any violation stipulated in this principle, regardless of whether the conduct complained of was sanctioned or specifically forbidden. In the case of non-employees breaching this principle, Deleum will notify the employer of such individual (if applicable) and Deleum may terminate the arrangement or agreement for the individual to work on Deleum's premises.
- 4.1.6 Although Deleum encourages an employee suffering from any violation stipulated in this principle to report the matter, any false accusations, fabricated allegations or otherwise complaints against another made in bad faith are considered as misconduct and there may be disciplinary action taken against the employee making such accusations, allegations or complaints.



## 5.0 REVISION HISTORY

**Revision Control Form:**  
Procedure for Human Rights and Labour Standards

**Scope:**  
This document is relevant to: Deleum Policy, DIMS

**Purpose:**  
This document provides for: Principles for Human Rights and Labour Standards

Revision Number	Revised By	Date	Reviewed by	Approved By	Date	Sheet Name	Description of Change
1	Kalaivani Jayaratnam	04/11/2025	1. Pritam Kaur 2. Desmond Ooi Hong Keat	Ramanrao		Deleum Group's Human Rights and Labour Standards	