



DELEUM

POLICY STATEMENT

ON

HUMAN RIGHTS AND LABOUR STANDARDS

Revision No: 2/2022

LABOUR STANDARDS **STANDARD PERBURUAHAN**

COMPANY POLICY ON LABOUR STANDARDS

Deleum complies with local laws or agreements regarding working hours, overtime hours, and work during holidays. We ensure that this statement is communicated to and understood by all stakeholders in a clear and timely manner.

All applicable laws, health, safety and environment standards are carefully observed to ensure a conducive working environment for all Deleum employees.

All employment-related information are communicated during induction. This information is accessible by all employees through Deleum Intranet but may not be readily available to the public.

CHILD LABOUR

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

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 below the age of eighteen.

- a. Deleum will not provide employment to children or young person before they have reached the legal age.
- b. Deleum will not tolerate the exploitation of children, and the physical punishment, abuse, or involuntary servitude of any worker.
- c. Deleum expects the suppliers and contractors with whom we do business with, to uphold the same standards. Should a pattern of violation of these Principles becomes known to Deleum and is not rectified within a reasonable time period, Deleum shall discontinue the business relationship.
- d. Deleum supports temporary workplace internship programs provided that such persons are closely supervised, and their moral, safety, health and compulsory education are not compromised in any way.

FORCED LABOUR

Deleum acknowledges that all employees have the rights to enter into 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 into employment voluntarily and freely, without the threat of any penalty. The policy is applicable to all personnel including interns, consultants and any other persons representing Deleum.

Employees shall have the freedom to terminate employment of indefinite or long duration by means of notice of reasonable length (in accordance with Malaysia law or mutual agreement) at any time without penalty.

Deleum recognises the responsibility that it shares with suppliers, vendors, sub-contractors, and recruitment services (collectively referred to as “Suppliers”) to address forced labour. This policy represents a clear contractual obligation as a condition for any business relationship with Deleum.

EQUAL PAY FOR EQUAL WORK

Deleum ensures that women and men working in identical or similar jobs of equal value are receiving equal remuneration within hiring practices, performance assessments, promotions, and leadership opportunities guidelines. Pay practices that reward performance and other legitimate factors should remain lawful. This would commensurate with individual employee performance, where reward and remuneration are at Company's lawful discretion.

Deleum respects privacy concerns and does not support initiatives that require Deleum to disclose confidential pay information of one individual to another interested employee nor any non-related parties.

RIGHT TO FREEDOM OF ASSOCIATION

Deleum is in compliance with 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.

Deleum is committed to treating everyone with dignity and respect by ensuring that our Suppliers commit to the same.

THE RIGHT TO A MINIMUM OR LIVING WAGE

In line with the Minimum Wages Order 2022 ("new Order") gazetted which took effect on 1 May 2022, Deleum is in compliance with local labour laws pertaining to a minimum wage and legally mandated benefits.

WORKFORCE DIVERSITY, EQUAL OPPORTUNITIES, OR NON DISCRIMINATION

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, nationality, ethnic origin, age, religion or belief, gender, marital status, sexual orientation, disability, or any other characteristic unrelated to the performance of the job.

The equal employment opportunity (EEO) applies 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.

The equal employment opportunity (EEO) principles also apply to the selection and treatment of independent contractors, personnel working at Deleum premises who are employed by outsourced agencies and any other persons or firms doing business for or with Deleum.

HARRASSMENT PROHIBITED

Deleum is committed in making sure that the working environment is a great place to work, healthy and free of harassment 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.

Any type of verbal or physical harassment of behavior 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 individual engaged in business with Deleum.

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 behavior.

Deleum does not subject anyone to a behavior that makes them feel vulnerable, humiliated, undermined, threatened, or degraded.

Legitimate, reasonable and constructive assessment of performance or conduct is not itself, bullying or harassment.

Harassment includes unwelcome conduct that is based on race, colour, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, 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.

Employee is also strongly encouraged to inform their Manager or the Management of the occurrence of any form of harassment in the workplace. All reports and/or complaints will be treated as private and confidential.

SEXUAL HARRASSMENT

It is each employee's responsibility to maintain a workplace environment free from sexual harassment. Sexual harassment report will be thoroughly investigated, and violation of this policy will be treated as serious misconduct. No employee or intern shall be subjected to retaliation for any good faith report of sexual harassment or for participating in an investigation.

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.

Deleum encourages employees to report all incidents of harassment to the Management. Deleum investigates all complaints of harassment promptly and fairly, and, when appropriate, takes immediate corrective action to stop and prevent the harassment from recurring.

Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. Deleum will promptly, thoroughly and fairly investigate every issue that is brought to its attention in this area and will take disciplinary actions, when appropriate, including termination of employment.