

GAMUDA GROUP POLICIES AND PROCEDURES MANUAL**HUMAN RIGHTS POLICY**

Ref. No.: GB-HR-GEN-002

Revision No.: 2

Date: 1 March 2025

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HUMAN RIGHTS POLICY**Prepared By: Group HR & Admin****Date: 15 March 2022****Approved By: GPC WC****Date: 10 August 2022**

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Revision No.	Date	Summary of Change	Revised by	Approved by
1	1 Oct 2023	• Rights of Community and Rights of Indigenous Peoples • Roles and Responsibilities • References	Rowena (GCC)	GPCWC
2	1 Mar 2025	Responsibilities of Internal Audit	Rebecca (HRD)	GPCWC

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1. OVERVIEW

Gamuda believes that everyone has the right to be treated with fairness, respect and dignity at the workplace where their knowledge, skills, and abilities are the critical factors in their success.

It is our aim to avoid contributing to adverse human rights impacts and mitigate any such impacts when they occur.

1.1 Objective

The purpose of this policy is to define the standards to which the Group is committed to and the employees shall be aware that any form of violence, forced labour, child labour, discrimination, including harassment, bullying and retaliation are unacceptable.

1.2 Scope

This policy is applicable to all employees, including full-time, part-time, temporary, probationary, casual and contract employees, as well as interns and directors of the Group.

Our commitment to human rights is also extended to the surrounding communities where we operate, and business partners and other suppliers involved in the value chain to fulfil their responsibility with respect to human rights. Business partners shall include, but are not limited to agents, lobbyists and other intermediaries, joint venture and consortia partners, governments, customers, clients, and local communities.

Suppliers shall include but are not limited to brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors and wholesalers.

1.3 Applicability

This Policy shall be read together with the Group's Code of Business Ethics and Whistleblower Policy. This policy shall be reviewed and amended whenever necessary to ensure its continued adequacy and relevance.

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2. STANDARDS

2.1 Diversity and Equal Opportunity

Gamuda values diversity and inclusion in the workplace. All employees will have equal access to career development opportunities appropriate to their experience and abilities. The Group shall not tolerate any form of discrimination, harassment or ridicule based on personal characteristic such as gender, age, race, sexual orientation or disability.

2.2 Safety and Health

The Group takes effective steps to prevent potential risks of accidents and injury to employees as outlined in the Safety, Health and Environment (SHE) policy.

2.3 Workplace Security

The Group is committed to maintaining a workplace that is free from violence, harassment, bullying, intimidation and other unsafe or disruptive conditions due to internal and external threats.

2.4 Child Labour

The Group shall refrain from hiring and deploying of child labour in all our business operations. The minimum age for employment shall be guided by the Children and Young Persons (Employment) Act.

2.5 Community & Business Principles

The Group believes in maintaining strong relationships with communities where we operate through proactive engagement and reasonable efforts to minimise the negative impact on the community both on the business and social fronts.

2.6 Housing and Amenities

Where housing and amenities are provided by the company, the Group shall provide workers with a living environment that is comfortable and conducive with well-maintained amenities.

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2.7 Modern Slavery / Forced Labour / Compulsory Labour

The Group shall not condone or be a party to any work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Such prohibition applies to the following indicators that constitute forced labour, although this is not exhaustive (as reference to the 11 ILO indicators of Forced Labour):

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

Due diligence in preventing modern slavery practices should not be confined to the employer / company but extend into the supply chain as well.

2.8 Conducive Work Environment

The Group shall strive to provide a work environment and work conditions that promote productivity, workplace harmony, work-life balance and employee well-being.

2.9 Freedom of Association

Gamuda respects freedom of association and collective bargaining as part of our commitment to support the fair and equitable treatment of our employees. The Group will not refuse any genuine opportunity to collectively bargain with employees who want to do so.

Employees have the right to join or form trade unions of their own choosing and to bargain collectively. Gamuda will refrain from discouraging its employees from exercising their union rights.

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2.10 Rights of Community and Rights of Indigenous Peoples

Gamuda acknowledges the equality and freedom of indigenous peoples and individuals, ensuring their protection from discrimination in the process of Free, Prior and Informed Consent (FPIC) and the exercise of their rights, particularly in relation to their indigenous origin or identity, including the right to self-determination. We are committed to promoting the socio-economic development of indigenous peoples, ensuring their effective representation and participation, respecting their land rights and culturally sensitive areas, and avoiding any form of involuntary resettlement.

2.11 Human Trafficking / Exploitation

Gamuda do not condone or tolerate any act of human trafficking and sexual exploitation. We believe everyone shall be treated fairly and with dignity.

3. ROLES AND RESPONSIBILITIES

- 3.1 All employees of the Group are to treat everyone with dignity, courtesy and to respect their human rights.
- 3.2 The Senior Management shall oversee the implementation of human rights standards and legal requirements and foster human rights awareness by supporting training initiatives and providing resources to enhance employee knowledge and skills in relation to human rights principles and practices.
- 3.3 The Supervisor / Manager / Head of Department are responsible to walk the talk by modeling appropriate standards of behaviour to further educate and promote awareness of this policy to the employees. Any breach of this policy / inappropriate behaviour reported will be taken into account and resolved in a timely manner. The Supervisor / Manager / HOD will also ensure employees who raise an issue or make a complaint are not victimized.
- 3.4 The Human Resource will oversee the adequacy and effectiveness of this policy. To ensure all employees are well versed with this policy, awareness / training will be conducted. Any complaints received / reported will be handled fairly to ensure all relevant parties are heard. The Human Resource will take the necessary action should there be a breach of this policy.

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Individual	Areas of Responsibilities
Employee	a. Read, understand and comply with this policy. b. Treat everyone with dignity, courtesy and respect.
Senior Management	a. Oversee the implementation of human rights standards and legal requirements and foster human rights awareness by supporting training initiatives and providing resources to enhance employee knowledge and skills in relation to human rights principles and practices.
Supervisor/ Manager/Head of Department	b. Model appropriate standards of behaviour. c. Educate and promote awareness of this policy to employees. d. Intervene quickly and fairly when they are aware of inappropriate behaviour / breach of this policy e. Ensure employees who raise an issue or make a complaint are not victimized.
Human Resource	a. Oversee adequacy and effectiveness of this policy. b. Awareness of this policy to staff to ensure good understanding. c. Handle complaints fairly to resolve issues, making sure relevant parties are heard. d. Take disciplinary action where there is a breach of this policy.
Contacts & Commercial / Group Procurement	a. Create awareness of this policy to our intermediaries, supply chain and business partners for their information/adherence. b. To ensure the human rights expectations of the Group is clearly communicated to all stakeholders.
Internal Audit	a. Carry out audit and report non-compliances (if any) to the Audit Committee, with board oversight on this policy.

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4. REPORTING PROCEDURE

Any employee who feels that he or she has been discriminated against or harassed can report the matter to his superior according to the grievance procedure or report any suspected violation of this policy through the appropriate whistleblowing channel without fear of discrimination or retaliation.

The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

Grievance procedure and whistle blowing mechanism are readily available to all of our employees including internal and external stakeholder.

The following is the link to our Grievance Policy for reference, <https://gamuda.com.my/2020/08/whistleblowing-policy-and-procedure/inv-corpgov/>. Grievances concerning the Group can be reported to the Chief Integrity and Governance Officer email at integrityline@gamuda.com.my.

5. REFERENCES

- United Nations (UN) Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- ILO Convention on Labour Standards
- Employment Act 1955
- Children and Young Persons (Employment) Act 1966
- Minimum Wage Order 2022
- Workers' Minimum Standards of Housing and Amenities Act 46 (Amendment) 2019
- United Nations Declaration on the Rights of Indigenous Peoples
- Vietnam Law Code, No. 45/2019/QH14 (2019)
- Australian Human Rights Commission Act 1986