

1. INTRODUCTION

Cenviro Group of Companies ("Cenviro") 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 factors in their success.

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

Human Resources is responsible for reviewing and updating this policy and/or other related social policies, and to provide guidance and support to all concerned.

2. OBJECTIVE

The purpose of this policy is to define the standards to which Cenviro is committed to and remind all employees that any form of violence, forced labour, child labour, discrimination, harassment, bullying and retaliation are unacceptable.

All individuals are to be treated with respect and dignity, can contribute fully and have equal opportunities in Cenviro.

3. SCOPE

This Policy applies to all Cenviro Group employees including full-time, part-time, temporary, probationary, casual and contract employees, interns, and directors of the Group and subsidiaries or branches.

This Policy shall not apply to non-operational controlled investment companies, agents, vendors, representatives, sub-contractors, or anyone acting on behalf of the Cenviro, and the employees of the agents, vendors, representatives, and subcontractors, as well as the people in the surrounding communities where we operate, and business partners and other suppliers involved in the value chain, to fulfil their own responsibilities with respect to human rights.

4. APPLICABILITY

This policy shall be read together with the Cenviro Code of Conduct, Whistleblower Policy, Malaysian Employment Act 1955, Malaysian Children And Young Persons (Employment) Act 1966, Malaysian Anti-Trafficking In Persons And Anti-Smuggling of Migrants Act 2007, and any other relevant Malaysian Act.

This policy shall be reviewed and amended whenever necessary to ensure its continued adequacy and relevance.

5. DEFINITIONS

VOCABULARY	DEFINITION
Forced Labour	Occurs when a person is forced to perform work against his or her free will, typically under threat of physical violence, injury, or other forms of punishment. Types of forced labour include bonded or indentured labour, prison labour, military labour and slave labour. Forced labour can also include requiring employees to abide by certain conditions of employment that are against their will. For example, requiring employees to participate in product testing or as research subjects as a condition of employment would qualify as forced labour.
Threat of Force	Involves requiring a person to work by threatening that person with physical violence, injury, torture or other forms of cruel or inhumane punishment. Examples include beating, denying food or water, preventing an employee from moving freely, holding employees' passports or threatening not to pay an employee for work. The threat can also be directed at the person's family, close friends, or property; for example, a threat to burn someone's home.
Bonded or Indentured Labour	Is work performed to repay a debt such as a loan or an advance payment. The worker (or a relative) is obligated to a particular creditor until the debt is repaid. Bonded labour may start with the worker agreeing to provide labour in exchange for a loan or to repay a recruitment fee. This type of relationship often develops into a long-term obligation as the worker is unable to repay the fee or loan or the employer adds more and more "debt" to the bargain.
Human Trafficking	Involves the recruitment and/or movement of people across borders and between regions of countries through recruitment fees that create a bonded labour situation, the threat or use of force or other forms of coercion or giving or receiving of payments or benefits to achieve the consent of a person for the purpose of exploitation. Exploitation can include forced labour, slavery, prostitution, or other forms of sexual exploitation. Individuals may be victims of human trafficking regardless of whether they consented to trafficking.
Child Labour	Is defined by Malaysian law as employment of a person below the age of 16, which could be harmful to their physical or mental development or that interferes with their schooling. Cenviro commits to not employ anyone below the age of 18.
Wages or Pay	Is money paid to employees for hours worked. Employees must be paid, at the very least, the minimum wage under applicable law.
Work Hours	Are the hours during which an employee is available to his or her manager or supervisor to provide service for the Company. This does not include meal breaks or rest days/breaks provided by applicable law.
Normal Work Hours	Are the maximum number of hours that an employee can work in one day or one week before overtime pay is required under applicable law.
Overtime Hours	Are any hours worked over normal work hours. Employees receive pay for all hours worked beyond normal work hours according to applicable law.
Harassment	Is defined as any single incident or pattern of behaviour where the effect, intentional or unintentional, creates a hostile, offensive, or intimidating work environment. Harassment is unacceptable in the workplace and in any work-related circumstances outside the workplace.

POLICY: HUMAN RIGHTS



Business Associate	An external party with whom Cenviro has, or plans to establish, some form of business relationship. This includes but not limited to customers, joint ventures (JV), JV partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, waste generators, agents, partners, bankers, insurance brokers, auditors, legal consultant/ solicitors, public and private officials or their representatives, distributors, intermediaries and investors.
Stakeholders	Are the people and groups inside and outside of Cenviro that we recognize are affected by our business practices. Stakeholders can include, for example, non-governmental organizations (NGOs), labour unions, local community leaders, religious leaders, international organizations, governments, investors and shareowners, employees, customers, and consumers. The type of stakeholder may be dependent upon the type of human rights issue involved, for example, stakeholders on privacy issues may be different from those related to a land matter issues.
Labour Union and Legally Recognized Union	Is an organization or group of individuals that collectively represents employees in dealing with management on matters of interest to the employees, most often wages, hours and working conditions. A "legally recognized union" is an organization or group of individuals that has been recognized by applicable law to act as the workplace representative for the employees at a company or companies. Legally recognized unions are often referred to simply as "labour unions."
Collective Bargaining	Is the process by which the employer and the employees' legally recognized labour union meet to discuss employees' wages, work hours and working conditions. An agreement reached by the parties is typically recorded in a contract known as a "Collective Agreement." Employees represented by a union may invite union representatives from that same union to assist in the collective bargaining negotiations. Applicable law usually sets out the procedures the parties must follow during the bargaining process and often requires that the parties' bargain in good faith.
Good faith	Generally means the parties will negotiate with an honest intent to reach agreement. Parties need not agree to particular proposals during this process, but they must be willing to consider the other sides' positions as part of their good faith bargaining obligation. This may also include the Company providing access to certain Company information. "Good faith" requirements may also be subject to conditions set by national law.
Hazard/ Hazardous Work	A hazard is a source of danger or risk of loss or injury.
Health Risk	May include any illness, medical condition or disorder other than a one-time injury that is caused by exposure to environmental factors associated with employment. This includes serious and chronic illnesses and diseases that may be caused by breathing in, swallowing, or touching something hazardous. It also includes musculoskeletal disorder, loss of hearing, chronic dermatitis, heat rash, heat stress illness, fainting, hypothermia, and loss of consciousness due to lack of oxygen or exposure to chemicals or other illness, medical condition or disorder.

POLICY:

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Workplace Violence	Is any physical or verbal attack or threatening behaviours that occurs in the workplace or is tied to the workplace. It also includes behaviours that is severe, offensive or intimidating so that an employee reasonably fears for his or her personal safety or the safety of his or her family, friends or property.
Business Partner	Business partners shall include, but are not limited to agents, joint venture and consortia partners, governments, clients and local communities.
Supplier	Suppliers shall include but are not limited to brokers, consultants, contractors, independent contractors, manufacturers, and sub-contractors.

6. STANDARD

6.1 Diversity and Equal Opportunity

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

6.2 Safety and Health

Cenviro takes effective steps to prevent potential risks of accidents and injury to employees as outlined in the Health, Safety, Security and Environment (HSSE) policy. We encourage employees to highlight concerns or hazards to the management either at the workplace or outside the workplace.

6.3 Workplace Security

Cenviro 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.

6.4 Child Labour

Cenviro 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.

6.5 Community & Business Principles

Cenviro 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.

6.6 Housing and Amenities

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

6.7 Modern Slavery / Forced Labour / Compulsory Labour

Cenviro 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 work

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

6.8 Conducive Work Environment

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

6.9 Freedom of Association

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

Employees have the right to join, form or not to join a labour union without interference, fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives.

6.10 Human Trafficking / Exploitation

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

7. ROLES AND RESPONSIBILITIES

- 7.1 All employees of Cenviro are to treat everyone with dignity, courtesy and to respect their human rights.
- 7.2 The Superior / Manager / Head of Department (HOD) are responsible to walk the talk by modelling 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 Superior / Manager / HOD will also ensure employees who raise an issue or make a complaint are not victimized.
- 7.3 The Human Resources will oversee the adequacy and effectiveness of this policy. To ensure all employees are well versed with this policy, awareness and training will be conducted. Any complaints received and reported will be handled fairly to ensure all relevant parties are heard. The Human Resources will take the necessary action should there be a breach of this policy.
- 7.4 To reiterate in due importance and for ease of reference, the responsibilities:
- 7.4.1 Employee
- Read, understand and comply with this policy.
 - Treat everyone with dignity, courtesy and respect.
- 7.4.2 Superiors / Manager / Head of Department
- Model appropriate standards of behaviour.
 - Educate and promote awareness of this policy to employees.
 - Intervene quickly and fairly when they are aware of inappropriate behaviour / breach of this policy.
 - Ensure employees who raise an issue or make a complaint are not victimized.
- 7.4.3 Human Resources
- Oversee adequacy and effectiveness of this policy.
 - Awareness of this policy to staff to ensure good understanding.
 - Handle complaints fairly to resolve issues, making sure relevant parties are heard.
 - Take disciplinary action where there is a breach of this policy.
- 7.4.4 Stakeholders
- Procurement to create awareness of this policy to our business partners, vendors, commercial entities, intermediaries, companies in Cenviro's supply chain, for their information and adherence.
 - To ensure the human rights expectations is adhered to by all relevant and related parties.

8. REPORTING CHANNELS

- 8.1 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 as listed below without fear of discrimination or retaliation.

8.1.1 Online: <https://cenvirowhistleblowing.com/>

8.1.2 Whistle-blower Hotline: 1-800-817-365 (this hotline is open 8:30 am to 5:30 pm for Bahasa Malaysia and Mandarin language and 24 hours and 7 days a week for English language only)

8.1.3 Email: report@cenvirowhistleblowing.com

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 our employees including internal and external stakeholder.

9. REFERENCES

- 9.1 Union Nations (UN) Universal Declaration of Human Rights
- 9.2 United Nations Guiding Principles on Business and Human Rights
- 9.3 Employment Act 1955
- 9.4 Children and Young Persons (Employment) Act 1966
- 9.5 Minimum Wage Order 2022
- 9.6 Workers' Minimum Standards of Housing and Amenities Act 446 (Amendment) 2019

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