UEM SUNRISE BERHAD

Registration No.: 200801028815 (830144-W)

WORKPLACE HARASSMENT POLICY 1.0

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1.0 INTRODUCTION

1.1 UEM Sunrise Berhad Group of Companies, and its subsidiaries are fully committed to providing a safe, healthy, and harassment-free work environment for all employees and believes that every employee should be treated with dignity, decency, and respect. As a step towards ensuring a secure and comfortable workplace for the employees, this Policy has been developed to reflect the Company's zero-tolerance approach against all forms of unlawful discrimination or harassment in the workplace.

2.0 PURPOSE

2.1 This policy outlines the Company's commitment to a healthy and safe workplace where all employees, persons working in the Company and visitors are not subjected to behaviors, practices or processes that may constitute harassment, vilification (publicly insults, criticises, or slanders a person harshly) or victimisation. The Company is committed to developing and maintaining an environment that is free of discrimination and harassment, and which promotes respect for persons, integrity, equitable treatment, and natural justice. As part of this commitment, the Company will continue to educate all employees on the importance of recognizing that harassment is a serious and unacceptable behavior that violates individual dignity and the Company's core values.

3.0 SCOPE

3.1 This policy extends to all employees including all Board members, employee of UEM Sunrise, and any parties who have dealings with UEM Sunrise Berhad regardless of location or position, has an obligation to follow the values outlined in the Code of Conduct and are subject to actions that can be taken against them if they are deemed to have breached the Code of Conduct.

3.2 The Handbook shall be read together with the Code of Conduct.

4.0 DEFINITION

Employees	Any individual employed by the Company, whether on a permanent, contract, temporary, or part-time basis.
Non-Employees	Any individual who is not employed by the Company but is present at or interacts with the workplace.
Workplace	Any location where work-related activities are conducted, including office premises, off-site assignments, business travel, training sessions, company events, and virtual platforms.
Complainant	An individual who reports or lodges a complaint of harassment.
Respondent	An individual against whom a complaint of harassment has been made ("Accused").
Witness	Any individual who has observed or has relevant information relating to the alleged incident.
Retaliation	Any adverse action taken against an individual for reporting harassment, participating in an investigation, or supporting a complaint.
Any parties' dealings with UEMS	This include but is not limited to Trainee, Vendor, Consultant, Customer and Contractor.

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5.0 PROHIBITION OF HARASSMENT

5.1 The Company does not tolerate the harassment of its employees in the workplace. In particular, the following are contrary to this Policy and therefore prohibited:

5.1.1 Any employee engaging in conduct that deemed to be 'harassment' under section 6, or encouraging such conduct by others; and

5.1.2 Any form of retaliation directed against an employee or third party who either complains about harassment or participates in any investigation concerning harassment. Retaliation includes dismissal, demotion, unwanted transfer, denial of opportunities within UEMS or harassment as a result of the complaint or participation in the investigation.

5.2 The Company's zero-tolerance position on harassment in the workplace applies to all aspects of employment:

5.2.1 Any act of harassment shall constitute a breach of the terms and conditions of employment;

5.2.2 Any employee (e.g. victim or witness) who is subjected to harassment shall not have his or her career development adversely affected, including but not limited to performance evaluation, promotion, or employment opportunities; and

5.2.3 All employees are required to conduct themselves in a professional manner and refrain from any behaviour that may be perceived as threatening, offensive, or constituting harassment.

5.3 Disciplinary actions shall be taken against any employee who contravenes and/or breach of this policy if found guilty.

5.4 The Company is responsible for taking stern necessary actions against any act of harassment, including dismissal.

5.5 In the case of any other parties dealings with UEM Sunrise and breaching this Policy, the Company will notify the employer of such individual (*if applicable*) and may terminate the arrangement or agreement for the individual to work on the UEMS's premises. Where the alleged conduct may constitute an offence under applicable law, the matter may be referred to the relevant authorities, and a police report may be lodged following consultation with People & Culture (P&C).

6.0 HARASSMENT IN THE WORKPLACE

6.1 Harassment means any verbal, written or physical conduct that is known or ought to have been known to be unwelcome, inappropriate, or otherwise offensive to a person, and that such conduct demeans, humiliates, threatens him/her, or otherwise violates his/her dignity. Harassment has the purpose or effect of:

6.1.1 creating an intimidating, hostile or offensive workplace;

6.1.2 interfering with the performance of an employee's functions, duties, and responsibilities; or

6.1.3 affecting employment opportunities or compensation.

6.2 Harassment may be motivated but not exclusively by one of these grounds:

- race or ethnicity;
- skin colour;
- religion;
- sex or gender;
- place of origin;
- ancestry;
- culture;

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- age;
- mental or physical disability;
- sexual orientation;
- family, marital, or social status;
- economic or financial background; and
- political affiliation.

6.3 In particular, this Policy identifies and seeks to eliminate the following types of harassment:

6.3.1 ***Racial harassment***

6.3.1.1 Harassment in the work conditions or working environment based on race is intended to cause, or has the effect of causing physical, mental, or emotional distress at the workplace. It is also a form of discrimination.

6.3.2 ***Sexual harassment***

6.3.2.1 Such harassment refers to conduct or behavior that is of a sexual nature, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive or humiliating or is a threat to his or her well-being, and includes such things as a request for sexual favors by a manager, superior, colleague or even a non-employee. It usually takes the following:

- Quid pro quo – This is when a person of authority (high-level position) gives or withholds a work-related benefit in exchange for sexual favors. Typically, the harasser requires such favors from the victim, either rewarding or punishing the victim in some manners.

- Hostile environment – This is when a victim subjected to unwelcome and severe or pervasive repeated sexual comments, innuendoes, touching or other conduct of a sexual nature which creates an intimidating or offensive place for employees to work. Sexual harassment is frequently more about power than about sex. It occurs in situations where there is unequal power between the people involved and is an attempt by the harasser to assert power over the victim.

- Coercion, unwelcome demands, invitations, or requests of a sexual nature.

- Lewd, leering, obscene or suggestive gestures.

- Unwanted or inappropriate physical contact that is non-consensual, such as kissing, pinching, stroking, fondling, patting, touching, and brushing up against a person.

6.3.3 ***Abuse of authority***

6.3.3.1 Abuse of authority happens when a person uses his/her authority to interfere with an employee or the employee's job. It includes humiliation, intimidation, threats, and coercion.

6.4 Workplace harassment may also occur through electronic or digital means. This includes conduct carried out via email, instant messaging platforms, collaboration tools (e.g., Microsoft Teams), social media platforms, mobile messaging applications, video conferencing platforms, or artificial intelligence (AI)-generated content. It also includes the creation, use, or distribution of altered, manipulated, or synthetic images, audio, videos, or other digital content intended to harass, intimidate, humiliate, threaten, or victimise any individual.

6.5 Although not exhaustive, Appendix 1 and Clause 6.4 provide examples of common conduct or behaviours that may constitute workplace harassment.

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6.6 Actions that are not workplace harassment:

6.6.1 Legitimate and reasonable management actions and business processes, such as actions taken to transfer, demote, discipline, redeploy, retrench, or dismiss a worker, not considered to be workplace harassment, provided these actions are conducted in a reasonable way. Managers are expected to offer constructive and reasonable advice and comment as a legitimate aspect of their role.

6.6.2 Appropriate provisions of guidance, conducting performance counseling, invoking diminished performance procedures, unsatisfactory performance procedures or misconduct procedures do not constitute harassment.

6.7 For the purposes of this policy, reference to the workplace means any place where the Company's business is carried out and other locations and situations, such as work-related off-site assignments and business travel, work-related conferences, training or social gatherings, or other locations where the prohibited conduct might have a subsequent impact on the working relationship, environment, or performance.

7.0 INFORMAL AND FORMAL APPROACH

7.1 Any employee who is experiencing or affected by harassment may take an informal approach, if he/she considers it appropriate, in resolving the problem by raising the matter directly with the person responsible (the "alleged harasser"). It is possible that the alleged harasser may not realise that this behavior is unwelcome or offensive. The employee may make an initial attempt to make it clearly known to the alleged harasser that his/her behavior is contrary to this Policy and that he/she should stop behaving in this manner. Alternatively, the employee may seek help from his/her Line Managers ("LM"), Head of Department ("HOD") or Division's Head ("DH") to informally approach the alleged harasser on his/her behalf.

7.2 Anonymous complaints may be investigated where sufficient information is provided to allow a proper assessment of the allegations. The Company shall evaluate anonymous reports on a case-by-case basis, taking into consideration the seriousness of the allegations, availability of evidence, and risks to individuals or the Company.

7.3 If the employee is unsatisfied with the informal approach or finds it inappropriate in the circumstances or unsuccessful, he/she may proceed with a formal complaint at any time. Nothing prevents the employee from making such a complaint immediately if he/she feels that the conduct is serious enough to warrant such an approach. The formal complaint should be directed in writing through either the workplace grievance flow in the HR system, via email to the Chief People & Technology Officer ("CPTO") or the Whistleblower channel.

8.0 COMPLAINT PROCEDURE AND APPEAL

8.1 An employee who has been directly harassed or has witnessed or is affected by the harassment of others should report such conduct to the CPTO or through the established grievance channels. If the employee needs help in determining whether harassment has occurred, or whether to take the formal or informal approach, he/she could seek advice from P&C. If the employee is not comfortable approaching the above-mentioned official or if the letter is the subject of the complaint, the employee could/should raise the matter to the Board of Directors and/or Top Management.

8.2 The right to raise at any time the issue of harassment by way of complaint or as a witness in an investigation should be exercised without fear of reprisal. As noted above, the Company prohibits any form of retaliation against employees.

8.3 A complaint received by the CPTO or People & Culture representative will be treated as strictly confidential. Information acquired from the investigation will also be kept confidential. All parties

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involved in the investigation, including both the victim and the harasser (alleged or otherwise), are required to keep such information secret.

8.4 An investigation will be conducted as discreetly as possible to avoid any embarrassment to the parties. Both the employee and the alleged harasser will be interviewed separately, as will any individuals who may be able to provide relevant information. Every employee is expected to cooperate in any investigation if requested.

8.5 The outcome of the investigation will be communicated to the employee who lodged the complaint. Where the employee is dissatisfied with the outcome of the investigation and believes that there are grounds for further review, including the availability of new and relevant information not previously considered during the investigation, he/she may appeal to next higher level of authority of the decision-maker within thirty (30) days from the date of being officially informed of the outcome.

8.6 Where the alleged harassment involves a member of Senior Management, CPTO, the Managing Director/Chief Executive Officer (MD/CEO), or any other individual whose involvement may compromise the impartial handling of the matter, the employee may report the concern through the reporting channels established under the Whistleblowing Policy, where applicable.

8.7 Any malicious or false accusations, fabricated allegations, or complaints made in bad faith constitutes an abuse of this Policy and shall be considered misconduct, for which disciplinary action may be taken against the employee making such accusations, allegations, or complaints.

9.0 SUPPORT AND PROTECTION

9.1 Where deemed necessary, the Company may implement appropriate interim measures to protect the wellbeing and safety of the complainant, respondent, witnesses, or any other individual involved, and to preserve the integrity of the investigation process. Such measures should be determined on a case-by-case basis and may include, but are not limited to, temporary adjustments to work arrangements, changes to reporting lines or duties, separation of the parties involved, temporary leave arrangements, or restrictions on workplace interactions.

9.2 Any interim measures implemented shall not be construed as a finding of misconduct or an indication of liability on the part of any party and shall remain subject to review, as appropriate, pending the outcome of the investigation.

9.3 Employees who raise a workplace harassment concern, participate in an investigation, or are otherwise involved in a workplace harassment matter may be provided with access to appropriate support resources, including counselling, wellbeing programmes, or other support mechanisms available under the Company's employee assistance initiatives.

9.4 Where appropriate, the Company may conduct follow-up reviews or implement reasonable measures to ensure that no retaliation, victimisation, intimidation, or adverse treatment occurs against any party involved following the conclusion of the investigation.

9.5 Any act of retaliation, victimisation, intimidation, or adverse treatment arising from the reporting of a workplace harassment concern, participation in an investigation, or involvement in the grievance process may be treated as serious misconduct and may result in appropriate disciplinary action.

10.0 DISCIPLINARY MEASURES AND RESTITUTION

10.1 The Company treats harassment as misconduct and disciplinary actions should be taken against anyone accused of such acts. If the investigation reveals evidence to support the complaint and upheld, the employee who is alleged harasser (“Accused”) will be subjected to disciplinary proceeding in accordance with the Company policies.

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10.2 The nature and severity of the disciplinary measures shall be commensurate with the gravity of the harassment. Such measures may therefore include suspension or dismissal. The incident will also be documented in the respondent's file.

10.3 An employee accused and found not guilty of harassment will be granted restitution deemed appropriate by the Company for any direct and foreseeable pecuniary loss suffered by him/her. For instance, where interim suspension without pay pending investigation of the case is instituted, such payment shall be reinstated.

11.0 ROLES AND RESPONSIBILITIES

11.1 Employee

11.1.1 Every employee reserves the right to be treated fairly and respectfully in the workplace and shall treat colleagues, managers, and stakeholders in general in a way that respects individual differences.

11.1.2 Employees are encouraged to address their concerns if someone behaves in a way that is offensive, humiliating or degrading and to speak up or report the complaint whether informally or formally in the manner provided in this Policy.

11.1.3 Employees should keep a written record of the details of the alleged incident(s) of harassment, including time, locations, and name of witnesses, if any.

11.1.4 All employees have a responsibility to cooperate in any investigation of a harassment complaint, including participating in the disciplinary proceeding in accordance with the Company policies. All information should be kept confidential. These are serious issues and privacy must be respected.

11.2 Line Managers ("LM")/Head of Department ("HOD")/Division Head ("DH")

11.2.1 LM, HOD and DH should also be familiar with this policy and are expected to be alert of any signs of harassment, such as an unexplained change in an employee's performance, rumors or an employee isolating himself/herself or distracted. If something does not seem right, LM, HOD or DH should speak to the employee concerned. Having someone willing to listen often helps the employee to talk about a problem.

11.2.2 LM, HOD and DH also have a responsibility of ensuring that the workplace remains free of harassment and in doing so, they should apply this policy consistently.

11.2.3 Any LM, HOD, DH, or person in a supervisory capacity who reasonably believes that workplace harassment may have occurred, shall promptly notify People & Culture or report the matter through the designated reporting channels, regardless of whether a formal complaint has been lodged.

11.2.4 LM, HOD and DH shall provide appropriate support to employees who may be affected by harassment, including facilitating access to relevant reporting channels and support mechanisms.

11.3 People & Culture

11.3.1 The People & Culture oversee to ensure that this policy and its applicable procedures for dealing with harassment are understood by all employees, and to raise awareness of workplace harassment. It includes making sure this Policy is consistently applied in all harassment complaints.

11.3.2 The People & Culture is also responsible for conducting investigations when required and reviewing this policy and its procedures so that the aims of this policy are achieved.

11.3.3 The People & Culture function shall provide appropriate support and guidance to employees and management in relation to harassment matters, including advising on reporting procedures and handling of complaints.

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12.0 FLOW CHART

The Company's Workplace Harassment Policy is available publicly and sets out the Company's commitment and approach to preventing and addressing workplace harassment. Detailed procedures and process flow for managing individual cases are maintained internally to support appropriate and confidential case management.

13.0 INTERPRETATION AND REVIEW

13.1 The Company reserves the right to amend, delete or augment any provision in this policy as and when it deems necessary to ensure both its relevance to the promotion of a secure and comfortable workplace and its effectiveness in ensuring that harassment in the workplace is prevented or dealt with effectively.

13.2 This Policy shall be in compliance with the Employment Act 1955, the Anti-Sexual Harassment Act 2022, the Industrial Relations Act 1967, the Occupational Safety and Health Act 1994, the Malaysian Penal Code(s), and any other applicable laws and regulations.

13.3 Any changes to this Policy shall be submitted for deliberation and approval of the Board.

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APPENDIX 1

1) Verbal, written insulting behavior, or comments; physical abuse, threats, and assaults.

2) Derogatory remarks, slurs, epithets, or language.

3) Unacceptable, annoying, or unwanted nicknames or negative stereotyping.

4) Racist, pornographic, or otherwise offensive signs, images, pictures, or materials displayed.

5) Coercion, unwelcome demands, invitations, or requests of a sexual nature.

6) Lewd, leering, obscene or suggestive gestures.

7) Unwanted or inappropriate physical contact that is non-consensual, such as kissing, pinching, stroking, fondling, patting, touching, and brushing up against a person.

8) Derogatory or offensive pranks and practical jokes.

9) Isolation or exclusion from others.

10) Bullying and victimization, for example, unreasonable and persistent criticism or humiliation, unreasonable distribution of work and responsibilities.

11) Inappropriate inquiries or comments about a person's sex life, religious or cultural norms, sexual orientation, family background, source of income or lifestyle.

12) Abusive and offensive language or shouting, including abusing a person loudly, usually when others are present.

13) Repeated threats of dismissal or other severe punishment for no reason.

14) Sarcasm or constant ridicule and being humiliated.

15) Constant unreasonable criticism about work or academic performance, often about petty or insignificant matters.

16) Leaving offensive messages on email or the telephone.

17) Electronic harassment such as through email, SMS, Facebook, Twitter, or others.

18) Threatening gestures or actual violence.

19) Sabotaging a person's work, e.g., by deliberately withholding or supplying incorrect information, hiding documents or equipment, not passing on messages, and getting a person into trouble in other ways.

20) Deliberate exclusion, isolation, or alienation of an employee including maliciously excluding and isolating a person from workplace activities.

21) Persistent and unjustified criticisms, often about petty, irrelevant, or insignificant matters.

22) Humiliating a person through gestures, sarcasm, criticism, and insults, often in front of clients, Management, or other workers.

23) Allocation of humiliating or demeaning tasks or sabotaging a person's work.

24) Spreading gossip or false, malicious rumors about a person with an intent to cause the person harm.

25) Inappropriate comments about a person's appearance.

26) Making the person undertake harmful or humiliating actions.

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