

# HUMAN RIGHTS POLICY

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## 1. INTRODUCTION

LBS Bina Group Berhad ("**LBS**" or "**Company**") and its subsidiaries ("**the Group**") endeavour to provide a conducive working environment that is characterised by mutual respect. The Group is committed to respecting and abiding internationally recognised human rights standards and fair labour practices according to relevant international treaties and/or convention and local statutory laws within the Group operations ("**Human Rights Laws**"). The Group recognises the importance of fair labour practices and good relationship with mutual respect between the Group and its employees to foster high morale amongst employees and to improve employees' engagement within the Group. The Group strictly does not condone any practices, events, and activities that are in violation of the abovementioned Human Rights Laws.

## 2. OBJECTIVE

The objectives of this Human Rights Policy are amongst others:

- a) To ensure all employment practices in the Group are in accordance with relevant employment laws and principles, including but not limited to the Employment Act 1955 and International Labour Organization ("**ILO**") standards.
- b) To identify any risks relating to current labour practices in the Group and determine effective methods to prevent and eliminate these risks.
- c) To provide a fair, respectable, and safe workplace for all employees in the Group.
- d) To foster a pleasant, cordial, and harmonious relationship between employer and employees for smooth operations, and to promote stability as well as prosperity.

## 3. SCOPE

This Policy applies to all Directors, employees (including those on permanent, contract terms, temporary, short-term, or secondment) or any third parties who become aware of, or are genuinely suspected on a reasonable belief to be an employee of the Group that has engaged, is engaged, is preparing to engage as well as our external stakeholders to be committed for the conducts as stated below.

In accordance with our commitment to the best practices on Human Rights Policy, we also expect our external stakeholders to uphold the same standards in their business operation including but not limited to honouring our human rights commitment.

## **4. COMMITMENTS**

In the pursuit of the objective, the Group undertakes the following:

### **a) Non-discrimination**

The Group has a zero-tolerance policy against discrimination in any form and employees of the Group are provided with equal and merit-based career opportunities regardless of gender, race, background, nationality, religion, age, physical condition, marital status, union membership/affiliation/activity, employment status or political affiliation.

### **b) Fair Employment Conditions**

The Group is committed to fair and equal employment opportunities for all. While we base all hiring decisions on merit, qualification, and performance, we aim to prioritise and develop local talent wherever possible, to contribute to the economic growth and well-being of the communities in which we operate.

### **c) Health and Safety**

The Group provides a safe and healthy workplace environment for employees. The Group complies with applicable health and safety laws, regulations, and requirements. The Group is dedicated in maintaining a safe, productive workplace and strive to take every measure to prevent job-related injuries and illnesses.

### **d) Workplace Security**

We strive to provide a safe and mutually respectful workplace environment free from violence, harassment, humiliation, and intimidation of any nature which includes but is not limited to physical, verbal, gesture, and any other form.

#### **e) Child Labour**

The Group is committed to upholding and protecting children's rights in all aspects of its operations. We prohibit all forms of child labour and fully comply with applicable child labour laws as legislated under the Children and Young Persons (Employment) Act 1966. Where young workers are onboarded into the Group via various internship programs or otherwise, we do so responsibly and in a manner that safeguards their rights and well-being. The Group condemns all forms of child exploitation and slavery and we aim to respect and promote children's rights across our business operations.

#### **f) Forced Labour**

The Group recognises that forced labour, modern slavery, debt bondage, and human trafficking may stem from coercive tactics and undue influence from people in position of higher authority towards people in lower positions of authority which may include violence or threats of violence, or more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to authorities.

The Group supports the elimination of forced labour, modern slavery, debt bondage and human trafficking. The Group takes the stand that the foregoing constitutes a severe violation of human rights and restriction of human freedom.

#### **g) Freedom of Association & Collective Bargaining**

The Group respects freedom of association as part of our commitment to support fair and equitable treatment of the Group's employees regardless of gender, race, background, nationality, religion, age, physical condition, marital status, union membership/affiliation/activity, employment status or political affiliation. Any form of discrimination based on the aforementioned factors is prohibited, and any union membership/activity will not lead to disciplinary measures or punitive actions.

#### **h) Equal Opportunities**

The Group is committed to inculcating diversity and equal opportunity in our workplace which allows us to gain a competitive edge through embracing workforce diversity as well as providing fair treatment to all our employees to promote improved morale and loyalty towards the Group.

In alignment with our commitment to supporting the community, the Group also promotes inclusive employment practices by encouraging fair access to job opportunities for individuals from underprivileged or marginalised backgrounds, including those with limited formal education, low socio-economic status, or other systemic barriers. Where feasible, the Group may support training, upskilling or community outreach initiatives to improve employability among such groups, while maintaining merit-based recruitment and selection processes.

**i) Reduction of Excessive Working Hours**

The Group's working hours are regulated under the employment contract with the respective employee, Malaysia Employment Act 1955 and/or the Employment (Limitation of Overtime Work) Regulations 1980. The Group is committed to reducing excessive working hours by ensuring that all employees are accorded with proper rest days to recuperate for the operational efficiency of the Group.

**j) Minimum Living Wage**

The Group recognises that a minimum wage has been mandated by the Malaysian authorities with the aim to protect employees against exploitative low wages. The Group is committed to comply with the local statutory laws on minimum wages and ensures that all wages are paid in a timely manner and to progressively aligning with living wage standards that exceed the legal minimum, where feasible, to support the well-being of our employees.

**k) Respecting Data Privacy**

The Group is committed to respecting the privacy and integrity of all employees and stakeholders. Any personal information obtained in the course of employment will be handled responsibly and in accordance with applicable data protection laws.

## 5. REPORTING OF VIOLATIONS OF THE POLICY

Any employee who knows of, or reasonably suspects, a violation of this Policy, is encouraged to report it via:

- i) *Grievance Mechanism*: For further details, please refer the section of “Grievance Mechanism” in this policy.
- ii) *Whistle Blowing Policy*: For further details, the Whistle Blowing Policy of the Group is available on LBS’ corporate website at [www.lbs.com.my/](http://www.lbs.com.my/)

## 6. REVIEW OF POLICY

This Policy has been approved by the Board and is available for reference on the LBS’ corporate website and internal computer networking system.

This Policy shall be reviewed by the Board once in every two years and updated whenever necessary to ensure its effective implementation. Any subsequent amendments to the Policy shall be approved by the Board upon recommendation of the Sustainability Committee.

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## **GRIEVANCE MECHANISM**

### **1. INTRODUCTION**

LBS Bina Group Berhad ("LBS" or "Company") and its subsidiaries ("the Group") tailored the grievance mechanism to provide employees an additional channel to address concerns and complaints related to workplace matters that do not fall under the purview of the Whistleblowing Policy. While the Whistleblowing Policy primarily deals with serious misconduct and unethical behaviour, this grievance mechanism is intended to address broader workplace grievances, disputes, or concerns. It is also typically an internal procedure for complaints followed by consideration, management response and feedback. Grievance reporting enables the Group to validate and monitor the policies construct.

### **2. OBJECTIVE**

The objectives of this Grievance Mechanism are amongst others;

- a) To help the Group to identify any unacceptable or unlawful gaps in current approach to grievances.
- b) To resolve any issues/concerns before they become serious issues or result in litigation.
- c) To protect the Group's brand or company image by avoiding the 'bad press' associated with a mishandled grievance

### **3. SCOPE**

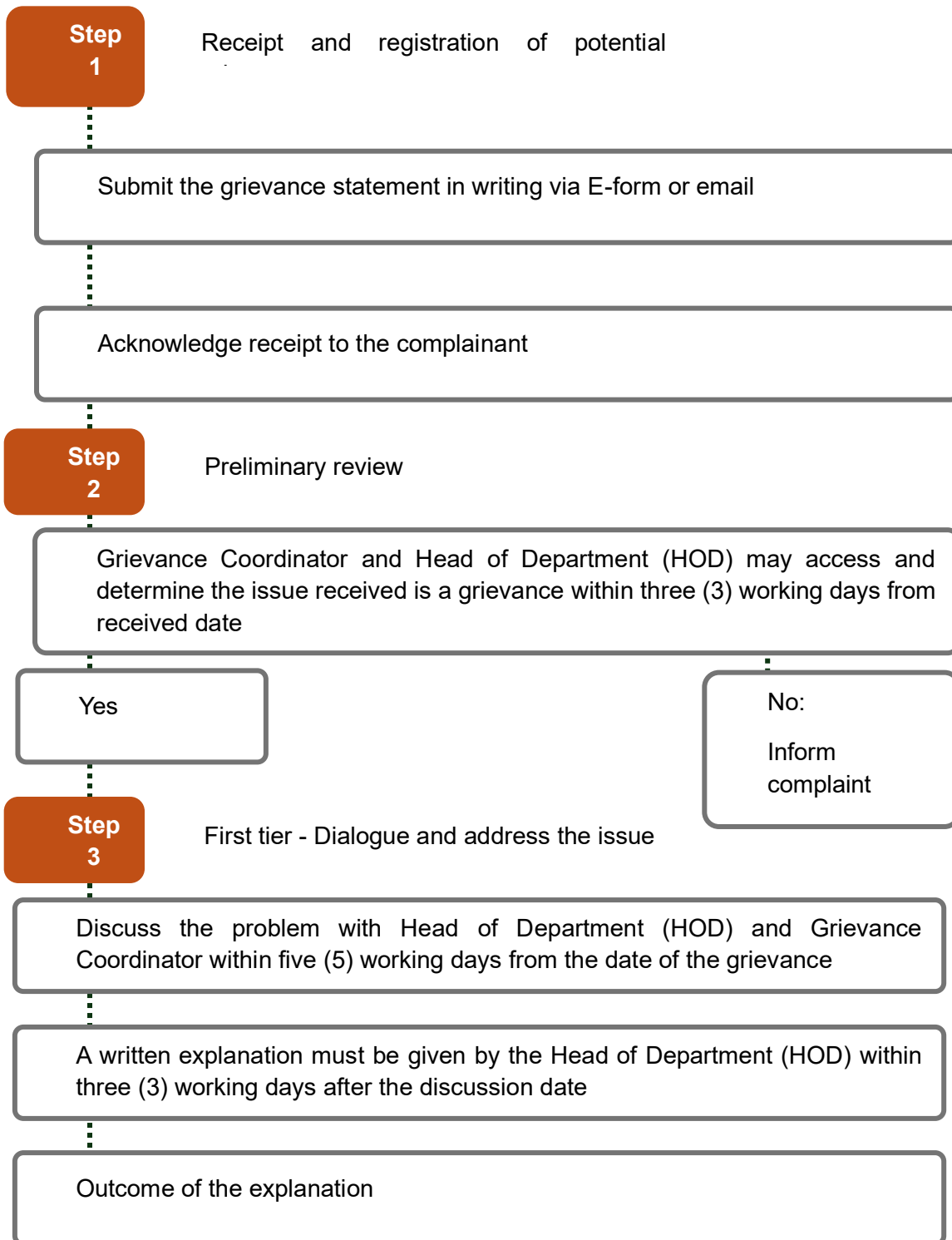
This grievance mechanism applies to all Directors, employees (including employees on contract terms, temporary or short-term employees and employees on secondment) or third parties who have become aware of or are genuinely suspected on a reasonable belief to be an employee of the Group that has engaged, is engaged, is preparing to engage.

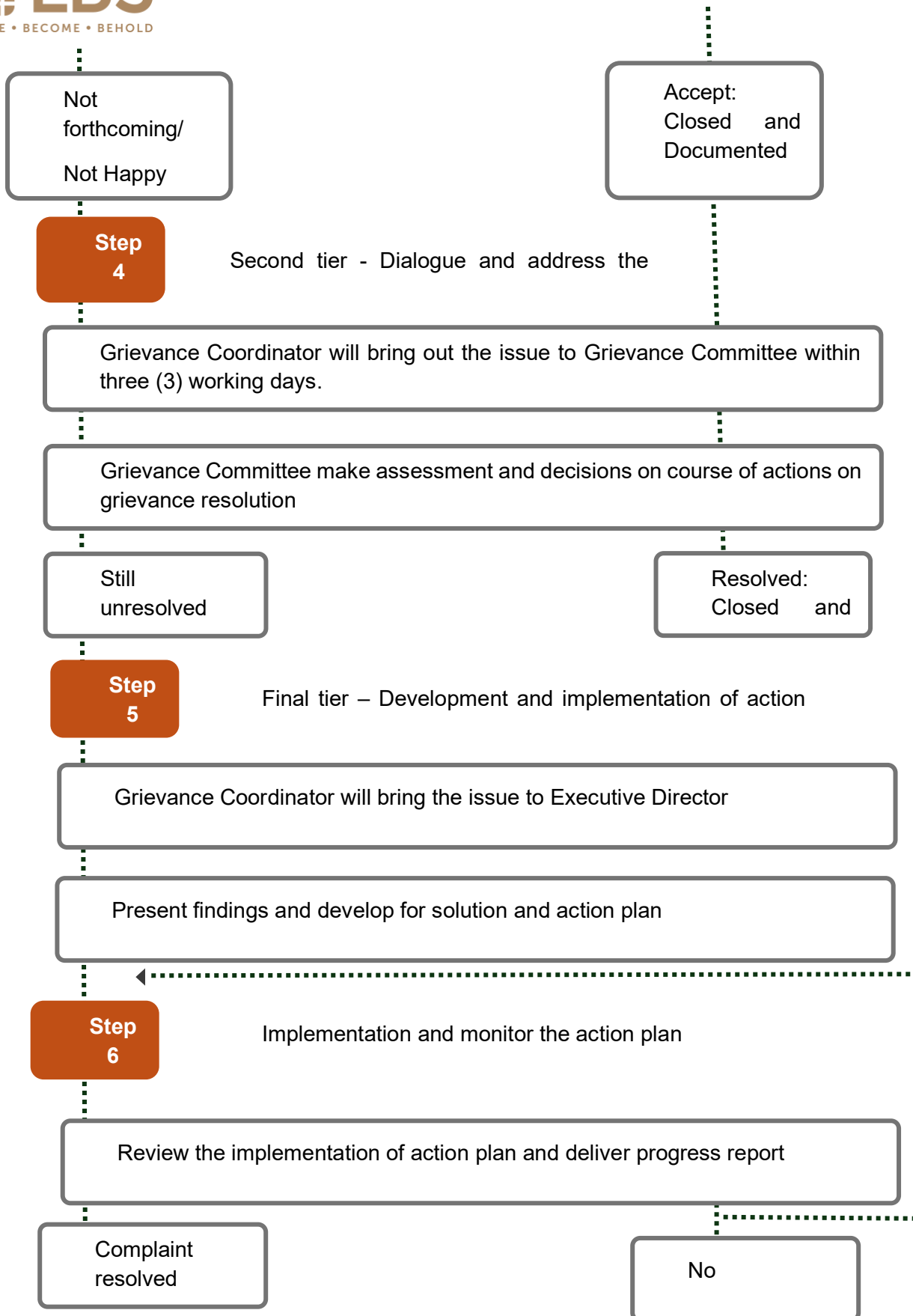
#### 4. GRIEVANCES

- a) **Economic:** Concerns from employee regarding wages or benefits.
- b) **Work Environment:** Concerns from physical work conditions such as too much heat or cold, cramped or limited work space, low lighting, bad quality equipment, faulty appliances etc., all constitute work environment related grievances and are valid causes of it.
- c) **Supervisory:** Workload, biased performance rating, berating, subtle insulting, harassment of any sort, all constitute supervision related grievances.
- d) **Employee Relations:** Bullying, conflict with co-worker/team member in delivering a project/task assigned



## 5. PROCESS FLOW





## 6. REPORTING

Any disclosure of grievances shall be made in writing via the few channels as follows:

1. File the grievance through E-Form submission -  
Grievance raisers may file and lodge their grievances via this E-Form link:  
<https://forms.office.com/r/kefDi0aRs9>
2. File the grievance through E-mail / Mail -  
Grievance raisers may also obtain soft form / physical copy form (Appendix 1) from HR department and fill up the form. They can submit the form via the followings:
  - a) E-mail: [grievance@lbs.com.my](mailto:grievance@lbs.com.my)
  - b) Mail to: LBS Bina Group Berhad, Level 1-4, Plaza Seri Setia, No. 1, Jalan SS9/2, 47300 Petaling Jaya, Selangor. (Attention: Grievance Coordinator)

The grievance raiser will receive an acknowledgement of the receipt. In cases where more information is required to start the investigation, the Grievance Coordinator shall contact the complainant for additional information. Grievance Coordinator will be personnel from HR Department.

The Grievance Committee is a group of panels which consists of three (3) independent members from difference departments. The selection criteria of Grievance Committee as follows:

- a) Grievance Committee's designation must be higher than grievance raiser.
- b) Grievance Committee must be free of partisanship that might hamper the independence of the committee.

Each member of Grievance Committee is responsible for:

- a) Review, assess and identify the grievance raised;
- b) Propose options to the grievance raiser or any other related parties to address the grievance;

- c) Ensure comments, responses and grievances are handled in fair, transparent and timely manner in line with the Group core values and best practices.

## **7. TRANSPARENCY AND CONFIDENTIALITY**

The Group is committed to the transparency in handling of grievances. Grievance raisers can contact the Grievance Coordinator for inquiries regarding the status of the case (by email / in writing). All grievances reported under this mechanism will be treated with utmost confidentiality to protect the privacy of the parties involved and ensure a fair resolution process.

## **8. REVIEW OF MECHANISM**

This grievance mechanism has been endorsed by Executive Director and is made available for reference in internal computer networking system.

It shall be reviewed and updated whenever necessary to ensure its effective implementation. Any subsequent amendments to this mechanism should be approved by Executive Director upon recommendation by the HR Department.

*(This part is intentionally left blank)*

### ***Appendix 1 - GRIEVANCE FORM***

This form is to be used to file a formal grievance. All denotes (\*) field are mandatory field to be completed and will serve as the source document for the grievance process. All supporting documentation must be attached to this grievance form at the time the grievance is filed. Additional information may be requested as necessary.

#### **A. Your Contact Information\*:**

Name:	<input type="text"/>
Company:	<input type="text"/>
Department:	<input type="text"/>
Position:	<input type="text"/>
Contact Number:	<input type="text"/>
Email Address:	<input type="text"/>

#### **B. Details of Grievances:**

<b>Date, Time and Location of Event*</b>	<b>Witness (if applicable)</b>
<b>Account of Event*</b>	<b>Violations</b>
<i>Please provide a detailed account of the occurrence, include the names of any additional persons involved.</i>	<i>Please provide a list of any policies, or guidelines you believe have been violated in the event described.</i>

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**C. Potential Solution(s):**

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**D. Form of Communication\*:**

Preferred form of communication:

- ☐ By Phone Call
- ☐ Email
- ☐ Private Message such as WhatsApp/Teams/Skype

**E. Declaration\*:**

Please retain a copy of this form for your own records. As the grievance raiser, your signature below indicates that the information you've provided on this form is truthful.

Signature:

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Date:

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