

	<b>Company</b>	<b>Hektar Asset Management Sdn Bhd</b>	
	<b>Department</b>	<b>Human Resource &amp; Administration</b>	
	<b>Human Rights Policy</b>	<b>Ref No</b>	<b>HAM/HR/POL/03</b>
		<b>Version No</b>	<b>01</b>
<b>Effective Date</b>		<b>01 November 2024</b>	

# HUMAN RIGHTS POLICY

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## 1. Objective

The Human Rights Policy (“the policy”) defines and explains Hektar Asset Management Sdn Bhd’s (“the Company”) commitment to respect and uphold human rights protection in line with United Nations Universal Declaration of Human Rights. Human rights are fundamental freedoms that must be equally and fairly applied to every individual regardless of race, gender, nationality, religion or any other personal characteristics.

## 2. Scope

This policy applies to all directors, employees and our business associates such as partners, agents, vendors, suppliers, contractors, consultants and any other third-party service providers or persons who perform services for or on behalf of the Company.

## 3. Commitment

It is a material matter to the Company and is of great importance to our Board and top management working together with employees and business associates (“We”) to ensure transparency and uphold respect for human rights, guiding the identification, prevention, mitigation and accounting for adverse human rights impacts.

We do not tolerate unethical labour practices, forced or compulsory labour, restriction of freedom of movement.


We respect the rights of our employees, stakeholders and communities through our commitments which include but are not limited to:

### 3.1 Diversity and Equal Opportunity

We promote and value diversity and inclusion in the workplace. All employees will have equal access to career development opportunities appropriate to their experience and abilities. We shall not condone any form of discrimination, harassment or ridicule based on personal characteristics such as gender, age, race, sexual orientation or disability.

### 3.2 Respecting Freedom of Association

We respect and recognize our employee’s right to join any association of their choice without the fear of reprisal or harassment. We will act in compliance with local labour laws pertaining to freedom of association.

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### 3.3 Workplace Security

We will maintain a workplace that is free from physical, psychological or verbal abuse, the threat of abuse and sexual or other harassments. We provide a conducive working environment that is characterized by equality and mutual respect. We take all reasonable measures to prevent such incidents and deal promptly and fairly with any reports of sexual harassment in a confidential and discreet manner.

### 3.4 Conducive Working Environment

We strive to provide a work environment and work conditions that promotes productivity, workplace harmony, work-life balance and employee wellbeing.

### 3.5 Safety and Health


We strive to promote and provide a safe, secure and healthy and conducive workplace environment to our employees. We also believe that the physical, mental, and emotional well-being of employees are essential to an organization. Employee must diligently observe and comply with Occupational Safety and Health Act 1994, Environment laws and other regulations of any country that they are working.

### 3.6 Forced Labour

Forced labour is any work or service that is exacted from any person under threat of any penalty and for which that person has not offered themselves voluntarily. It can manifest itself in various forms, for example, 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, and excessive overtime.

Hektar 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.

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

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### 3.7 Child Labour

We shall adhere to minimum age provisions of applicable laws and regulations, being consistent with the United Nations Convention on the Rights of the Child and the relevant standards under the International Labour Organization. We are committed to ensuring that no children are employed directly at our business operations.

### 3.8 Fair Wages and Benefits

We shall pay remuneration in line with the type of work done and would always comply with the Minimum Wages Act. We shall provide benefits to our employees with the provision in the Employment Act 1955.


### 3.9 Human Trafficking and Exploitation

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

## 4. Principles & Approach

The Company's approach to human rights is guided by the following principles:

- 4.1** Respect and uphold human rights and seek to identify, prevent, mitigate and account for adverse human rights impacts which may arise through our business activities.
- 4.2** Take a proactive approach to integrating human rights considerations into our decision-making processes.
- 4.3** Take a risk-based approach to assess actual and potential adverse human rights impacts across the company.
- 4.4** Take appropriate actions to mitigate adverse human rights impacts, and where necessary, provide for or cooperate in remediation in line with our responsibility.
- 4.5** Take a holistic approach to our policies and business decisions where we strive for and not just for a transition.
- 4.6** Track the effectiveness of our actions.

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**4.7** Be transparent about our adverse human rights impacts and communicate how we fulfil our responsibility to respect human rights.

**4.8** Engage actively and openly with our business relations to achieve greater success.

## 5. Roles & Responsibilities

**5.1** All employees are requiring treating everyone with dignity, courtesy and to respect their human rights.


**5.2** This policy is to be led by the Board of Directors, C-Suites, Sustainability department, Human Resource & Administration Department, Purchasing department and Governance department. All the mentioned parties above are responsible to walk the talk by portraying good 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 considered and resolved in a timely manner. They should ensure employees who raise an issue or make a complaint are not victimized.

**5.3** The Human Resource department 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 department will take the necessary action should there be a breach of this policy.


**5.4** The summary of roles and responsibilities:

### Roles and Responsibilities

<b>Individual/ Department</b>	<b>Areas of Responsibilities</b>
Employee	<ul style="list-style-type: none"> <li>a. Read, understand and acceptance to comply with this policy.</li> <li>b. Treat everyone with dignity, courtesy and respect.</li> </ul>
Superior/ Manager/ Head of Department/ C-Suites, Board of Directors	<ul style="list-style-type: none"> <li>a. To oversee and responsible for managing human right risk as a key element of standards of practice and ethics.</li> <li>b. Supports in educating and promote awareness of this policy within the Company.</li> </ul>

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Sustainability	<ul style="list-style-type: none"> <li>a. To advise and provide guidance to the company on the standards of United Nations Universal Declaration of Human Rights etc.</li> <li>b. To oversee the Company's Sustainability Policy and material ESG strategy which involves or have impact to Human Rights.</li> <li>c. To conduct human rights due diligence under the Sustainability initiatives.</li> </ul>
Human Resource & Administration	<ul style="list-style-type: none"> <li>a. Oversee adequacy and effectiveness of this policy.</li> <li>b. To engage and create awareness of this policy to staff to ensure good understanding and improvement of human right practices.</li> <li>c. Handles reported complaints via the Employee Grievances in a fair and just manner to resolve issues.</li> <li>d. Take necessary disciplinary action where there is a breach of this policy.</li> <li>e. Ensure employees who raise and lodge this issue is not victimized.</li> </ul>
Procurement	<ul style="list-style-type: none"> <li>a. Create awareness of this policy to our intermediaries, supply chain, vendors and business partners for their information/ adherence.</li> <li>b. To ensure the human rights policy is clearly communicated to all stakeholders.</li> <li>c. Conduct due diligence process based on Vendor's Code of Conduct /appointment process.</li> </ul>
Governance	<ul style="list-style-type: none"> <li>a. Oversees and to report for any compliance issues to the Management.</li> <li>b. Handles reported complaints via the Whistle Blowing policy in a fair and just manner to resolve issues.</li> </ul>

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## 6. Reporting

Any employee who feels that he or she has been discriminated against or harassed can report the matter to his superior according or report any suspected violation of this policy through the appropriate whistleblowing channel without fear of discrimination or retaliation. Complaints under Employee Grievances and/or Whistle blowing policy are readily available to all our employees including internal and external stakeholder. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

## 7. Review and Revision

The Company reserves the right to amend this policy from time to time and shall notify all relevant stakeholders when such amendments has been made. Should there be a translation of this policy into other languages, the English version of this policy shall be authoritative in the event of any dispute or confusion.

## 8. References

### 8.1 Key Documents Related to this Policy

- 8.1.1 United Nations Universal Declaration of Human Rights
- 8.1.2 Employment Act 1955
- 8.1.3 Occupational Safety & Health Act 1994
- 8.1.4 Children & Young Persons (Employment) Act 1966
- 8.1.5 Minimum Wage Order 2022
- 8.1.6 ILO Convention on Labour Standards