



SPORTS TOTO BERHAD

ANTI-CHILD AND FORCED LABOUR POLICY

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SECTION 1 : INTRODUCTION

- 1.1 Sports Toto Berhad and all its subsidiaries (collectively as “the Group”) are steadfast in embracing universal value and highest standards of business and ethical behavior that observes and complies with all local laws, existing company ethos and policies, procedures and established legal practices.
- 1.2 The Group does not accept, practice or subscribe to nor condones any form of forced labour*, bonded labour, child labour, any form of modern slavery, human trafficking and expressly prohibits any or all forms of exploitation of children†.

*Forced labour may include any form of work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

†(The term “child” means a person under the age of fifteen (15) years of age - Children and Young Persons (Employment) (Amendment) Act 2019 and the term “young person” means a person who has attained the age of fifteen (15) years and under the age of eighteen (18) years).

- 1.3 To ensure that there is no child and forced labour within its group of companies, the Group is committed to prevent any violation of the same by enforcing this Policy throughout the Group which would be applicable not only within the Group but also its direct suppliers / contractors / vendors who have any form of business (directly or indirectly) with the Group.

SECTION 2 : SCOPE OF APPLICABILITY

- 2.1 This Policy shall be applicable to all companies in the Group including subsidiaries, joint ventures, companies owned by the Group and any other affiliated companies where the Group holds an interest.
- 2.2 The Group also expects all its business partners, such as associate companies or other investment where the Group has overall control, as well contractors, suppliers, vendors and others to uphold and comply with this Policy.
- 2.3 The Group does not employ any person below eighteen (18) years of age whether at its workplace, facilities and/or other concerns. The age of the person is substantiated by the person’s Malaysian national registration identity card (“MyKad”) or passport for non-Malaysian. Production of MyKad or passport for work application when verified and approved by authorized personnel from the Human Resource Department shall be as conclusive of that persons’ age at the time of work application.

- 2.4 The Group explicitly prohibits the use of forced, compulsory labour or deception by any of its directors, senior management, head of department, team leader or reporting head on any of its employees. These prohibitions may include but not necessarily be limited to the followings :
- 2.4.1 The actual use of force or coercion (whether directly or indirectly / mentally) or the threat of using such force or coercion on any employee to compel obedience resulting in the employee working against his / her will;
 - 2.4.2 Subjecting an employee to punishment or threat of punishment of any form (whether directly or indirectly / mentally) in the event of the employee refusing to comply or accept the directions of the superior;
 - 2.4.3 The use of inducement whether reward of whatever kind (be it promotion, pay rise, privileges, incentives, transfer, less work more pay etc.), which may not be followed through at the end, to compel an employee to work against his / her will;
 - 2.4.4 Any form of sexual harassment (whether directly or indirectly / mentally) perpetrated during or even after working hours.
- 2.5 All potential employees are free to apply for any position within the Group which they would like to be employed and are further encouraged to apply in their field of desired employment. The Group is committed to ensure that all employees work of their own free will and are free to leave the Group upon reasonable notice under the terms of their contract of employment or applicable laws. There shall be no restriction on freedom of movement in the Group.
- 2.6 No employee or company within the Group may hire child or forced labour on behalf of the company.

SECTION 3 : IMPLEMENTATION

- 3.1 This Policy (together with any amendments) shall be available in the Group's official website where all policies are kept and shall be disseminated to all companies within the Group. The Group shall ensure that this Policy is easily available to all its employees and throughout the Group.
- 3.2 Human Resource Department shall be fully responsible for the implementation of this Policy.
- 3.3 The employment contracts and other records, documenting all relevant details of the employees in the Group, including age, are maintained at the respective Human Resource Department of the Group and are open for verification by any authorized personnel or relevant statutory bodies if required by law or pursuant to any court judgment.

- 3.4 All recruiting personnel who do recruitment, talent sourcing or recruitment exercises shall ensure that the age of each applicant who has come to apply for any job within the Group or its subsidiaries meet the requirements of the Group and complies with this Policy.
- 3.5 The Group expects all companies within the group and its subsidiaries to comply with the local laws and ILO conventions (where applicable) on child labour and forced employment. There shall be zero tolerance towards the breach of this Policy.

SECTION 4 : MONITORING OF IMPLEMENTATION

- 4.1 The Group shall conduct a due diligence exercise from time to time to ensure that this Policy has been complied with within the Group and to monitor its implementation.
- 4.2 The Human Resource Department within the Group shall undertake random checks of records annually and/or when possible, to ensure the compliance of this policy within the Group.
- 4.3 The Group may assign any specific personnel the responsibility to overlook the implementation of this Policy.

SECTION 5 : POLICY REVIEW AND REVISION

- 5.1 This Policy shall be held in the custody of the Group Human Resource & Administration Department of the Group.
- 5.2 The management and relevant stakeholders will on an ongoing basis review, assess and evaluate any proposed amendments to this Policy to ensure the relevancy, adequateness and effectiveness of this Policy. Any requirement for amendment, modification, variation or any addition to this Policy shall be deliberated and approved by the Group's management.
- 5.3 The Group is committed to adhere to all local and national laws and to adopt the best practices in accordance with the country's interest and international labour standards to safeguard its employees and/or children against any forced labour, bonded labour and human trafficking.

SECTION 6 : REPORTING OF BREACH

- 6.1 Any breach and/or infringement of this Policy can be reported to the Group Human Resource & Administration Department or through the whistleblowing procedures put in place by the Group.
- 6.2 Any director, senior management, employee, vendor or suppliers or people performing any service for the Group may lodge a report on any breach and/or infringement of this Policy if they have sufficient or cogent evidence and facts relating to the same.

- 6.3 Members of the public may also report on any breach and/or infringement of this Policy if they have sufficient or cogent evidence and facts relating to the same.
- 6.4 The Group will assist any employee uncovered to be a victim of any kind of child labour or forced labour. Immediate action will be taken to address the situation and to notify the relevant authorities (where applicable).

SECTION 7 : CONCLUSION

- 7.1 The Group will constantly review how best to strengthen its approach on addressing child and forced labour within its group of companies and subsidiaries.
- 7.2 The Group exclusively reserves the right to add, amend, annul, vary or modify the provisions set out in this Policy as and when it deems necessary at its sole discretion.