



SPORTS TOTO BERHAD

HUMAN RIGHTS AND LABOUR STANDARDS POLICY

24 MAY 2024

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SECTION 1: INTRODUCTION

- 1.1 Sports Toto Berhad and all its subsidiaries (collectively referred to as “the Group”) are committed to ensure that Human Rights are respected and recognized throughout its group of companies, subsidiaries and affiliated companies. The Group recognizes its ethical obligation towards this commitment and actively seeks to avoid any adverse human rights impacts caused by any of its business activities.
- 1.2 The Group’s commitment to human rights is grounded in its Code of Conduct and other policies and procedures put in place by the Group. The Group is committed to adhere to the universally recognized principles of human rights as established in the Universal Declaration of Human Rights and the International Labour Organization’s Core Conventions (Declaration on Fundamental Principles and Rights at Work). The Group strives to embrace all the principles as enshrined in the above Declaration and Conventions on Human Rights and seeks to integrate the same into all its’ core businesses. By ensuring Human rights are respected throughout the Group, it seeks to live up to its purpose of building trust with the local and international business community.
- 1.3 The Group will strive to meet the higher human rights standards set by the international community and where local laws are concerned, the Group will comply with the same and shall seek ways to respect and influence positive changes within its sphere of business by embracing such laws. The Group will continue to find ways to promote and enhance human rights within its scope of influence and group of companies. In addition, the Group shall ensure that it will inculcate and uphold good workplace practices and include people among the community in its area of operation to generate ideas, which supports human rights and obliterates unethical business practices.

SECTION 2: DEFINITION OF HUMAN RIGHTS

2.1 What Are Human Rights?

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, right to choose and right to live. Every individual is entitled to these rights, without discrimination or limitation.

SECTION 3: OBJECTIVE OF THE POLICY

- 3.1 The objective of this Policy is to ensure that all the principles as enunciated in the Universal Declaration of Human Right and the ILO conventions are applicable to all its group of companies and there is just application of the principles throughout the Group.

- 3.2 The responsibility and the management of human rights issues extends across the management of the Group and it considers emerging human rights as significant and pertinent in its daily business operations. Therefore, the Group seeks to insert human rights considerations in all its business operations, services and supply chain.
- 3.3 By establishing this Policy, the Group seeks to prevent and/or mitigate any adverse human rights impact that are directly linked to its operations, business and/or services. This Policy would also provide quick/effective remedial action to be taken should any adverse human rights breach occur, which might have an impact of the Group's business. Towards this end and to ensure no such breach occurs, the Group will comply with all local laws, regulations and cooperate with the relevant authorities in respecting and promoting human rights in all the countries in which it operates.

SECTION 4: SCOPE OF APPLICATION

- 4.1 This Policy is applicable within the Group, all its directors regardless of their position or role and all its employees. The Group will encourage all its suppliers, customers, business associates and all companies in which the Group has an interest to comply with this Policy.
- 4.2 The Policy shall also be applicable to all Malaysian operations within the direct control of the Group and to all countries where the Group has business activities and established subsidiaries.
- 4.3 The Group will also expect all its business partners and other relevant parties to comply with all human rights principles and to recognize and respect the same.
- 4.4 Any other intermediaries who are performing work and/or service for or on behalf of the Group.

SECTION 5: THE GROUP'S PRINCIPLES

- 5.1 The Group has always adopted a principled stand in the area of Human Rights and has embraced the policy of providing a workplace where all employees are respected and treated with dignity. The Group does so regardless of race, gender, where they come from and their ethnic background. Towards this end, the Group has stressed and is committed to the following :
- 5.1.1 to treat everyone in accordance with the principles of human rights and on an equal footing without any discrimination or gender bias;
- 5.1.2 to ensure that there is no violation of any human rights within the Group and its affiliated companies;
- 5.1.3 to support all local laws, policies and procedures on human rights which includes the international declaration of human rights and any convention on human rights passed by the United Nations (where applicable);

- 5.1.4 to support the communication of the above laws, policies and procedures on human rights to all its employees including the dissemination, education, creation of understanding, direction, monitoring and support required to ensure that the same is applied throughout the Group;
- 5.1.5 to provide fair and equitable wages, benefits and other conditions of employment as per the local laws;
- 5.1.6 to comply with the safety and health local laws and to provide safe working conditions including a healthy working environment;
- 5.1.7 to respect all workers right to freedom of expression and freedom of association;
- 5.1.8 to prohibit any child and forced labour within the Group;
- 5.1.9 to encourage employees to adopt a growth mindset where learning is ongoing and training is provided to ensure that the Group's workforce is ready for new challenges including increasing their employability; and
- 5.1.10 to provide fair treatment to all migrant and foreign workforce within the Group.

SECTION 6: KEY AND FOCUS AREAS OF BERJAYA GROUP

- 6.1 In line with the above principles and guidelines, the Group will stress and focus on the following key areas in addressing human rights and any risks that could have the most significant impact on its employees, business activities or business relationships and the people who are affected by its daily operations. This in return would assist the Group in prioritizing areas and help it learn where to focus its efforts.

6.1.1 Non-discrimination

The Group has zero-tolerance towards any form of discrimination and is committed to elimination of all forms of discrimination in respect of its engagement in employment. The Group's Code of Conduct also requires all employees to adhere to such practice and policy.

6.1.2 Workplace Security

The Group strives to provide a safe and mutually respectful workplace environment that is free from all or any kind of harassment, violence, humiliation, bullying and intimidation. Harassment would include sexual harassment, psychological harassment and verbal harassment. No form of abuse or other harsh inhumane treatment by either directors, senior management, reporting managers or fellow employees is allowed by the Group.

6.1.3 Health and Safety

The Group provides a safe and healthy workplace environment for its employees. It complies with all Safety and Health Laws, regulations and requirements set forth by the same. All employees as well as management and leaders are expected to demonstrate visible commitment through their behaviour in complying with the applicable safety and health policies and procedures put in place by the Group. The Group is dedicated to and has implemented the necessary measures to prevent any job-related injuries, illnesses or accidents and aims to achieve zero fatalities in each calendar year.

6.1.4 Freedom of Association and the Right to Collective Bargaining

The Group respects its employees right whether to join or not to join a trade union. The Group recognizes the employee representation within the context of local laws and the right to collective bargaining.

6.1.5 Forced and Child Labour

The Group is against all forms of forced or child labour. It has also put in place a policy to prohibit any form of forced, bonded or child labour. The Group complies with all applicable laws on child labour and prohibits any form of human trafficking.

SECTION 7: IMPLEMENTATION

7.1 The Group upholds and aspires to maintain good Human Rights practices within its group of companies. It recognizes that this aspiration is a continuous journey of improvement and needs to be undertaken together with all its partners, suppliers, business associates and service providers. To achieve the above, it has put in place appropriate measures and guidelines to ensure that this policy is successful and employees at all levels are aware of the importance of human rights. The following are the guidelines it has implemented to ensure the sustainability of this policy:

7.1.1 Everyone shall respect human rights and treat each other with honor, dignity and equality without any consideration of race, nationality, gender social status, culture tradition or any other status.

7.1.2 All employees and companies within the Group shall support the communication, dissemination, education, creation of understanding, direction and provide any support to employees, supplier and/or contractors in the group's business value chain including joint ventures to the Group in respecting human rights and treating everyone based on the human rights principles enshrined in this Policy.

7.1.3 The management of all companies within the Group shall have the responsibility to ensure that the Group's businesses and direction align with this Policy.

7.2 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.

7.3 Human Resource Department shall be fully responsible for the implementation of this Policy.

SECTION 8: MONITORING OF IMPLEMENTATION

8.1 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.

8.2 The Human Resource Department and other relevant departments within the Group will conduct spot check, random monitoring and/or where practicable, to assess risks and ensure compliance of this Policy within the Group.

8.3 The Group may appoint any personnel or outsiders (professional bodies) to oversee this Policy and such person shall be given the full authority to conduct any investigation, inquiry or interview of any aggrieved party in respect of any complaints lodge and to ascertain whether there has been any breach and to report the same to the management.

8.4 The Group is determined to create and maintain corporate culture which aims to prevent human rights violation and any person who violates this Policy shall be subjected to strict disciplinary action (where applicable).

SECTION 9: POLICY REVIEW AND REVISION

9.1 This Policy shall be held in the custody of the Group Human Resource & Administration Department of the Group.

9.2 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.

9.3 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 to prevent any human rights abuse within the Group.

- 9.4 The Group and the relevant departments in charge of this Policy shall regularly review the same taking into account any changes to the relevant legislation, regulations and/or labour conventions that are significant to the organization and incorporate the changes into this Policy (where applicable).

SECTION 10: REPORTING OF BREACH

- 10.1 The Group has proper grievance mechanisms in place for the reporting of any violation and also protects whistleblowers who report such breach. The whistleblower shall be provided protection and all information given by the whistleblowers shall be treated with utmost secrecy and confidentiality in accordance with the Group's Whistleblower Policy.
- 10.2 Reports can also be made to the Group Human Resource and Administration Department and/or any department entrusted with the protection of this Policy by any employee, third party suppliers/contractors and/or members of the public who have knowledge of the breach.
- 10.3 The Group shall render all probable assistance to any employee who is uncovered to be a victim of human rights abuse within the Group and immediate action will be taken to address the situation and to notify the relevant authorities of such incidence (where applicable).

SECTION 11: CONCLUSION

- 11.1 The above statements outline and describe the reasonable expectation which the Group hopes to achieve by implementing the Policy.
- 11.2 The Group is committed to provide adequate human rights protection to its workforce and where possible, ensure that all its business partners and companies with which it has business, will try to emulate its practice on human rights and labour standards.
- 11.3 All employees including management and senior managers are encouraged to uphold this Policy by ensuring that they adhere to the same and regularly promote awareness and corporate responsibility to everyone in the Group. The Group strongly believes that accountability is the foundation for an effective human rights management and actively listening to its employees and providing proper learning is the way forward for a sustained growth of the organization.
- 11.4 The Group exclusively reserves the right to add, amend, delete, vary or modify the provisions set out in this Policy as and when it deems necessary at its sole discretion.