

Human Rights Policy

JENTAYU Group
of Companies



Version	Date	Description	Approved by
1.0	23 May 2023	<ul style="list-style-type: none"> • Initial Version 	Board of Directors
2.0	29 May 2025	<ul style="list-style-type: none"> • Align with evolving international human rights standards and labour laws. • Reinforce commitment to responsible business conduct, especially concerning child labour and forced labour. • Integrate broader human rights considerations, including the SDGs and UN principles. 	Board of Directors
3.0	25 Feb 2026	<ul style="list-style-type: none"> • Enhanced non-discrimination provisions to explicitly include additional protected characteristics. • Clarified commitments on working hours, fair remuneration, and the protection of children's rights. • Strengthened expectations for suppliers and business partners to uphold basic human rights and labour standards. • Updates made to strengthen policy clarity and alignment with recognised international human rights standards. 	Board of Directors

1.0 BACKGROUND

Jentayu Sustainables Berhad and its subsidiary companies ("the Group") are committed to fostering a sustainable and high-performing organisation that supports the well-being and advancement of employees and communities. The Group upholds the United Nations Guiding Principles on Business and Human Rights, ensuring operations respect and promote fundamental human rights.

This Policy establishes a structured approach to prevent and address human rights abuses across our operations through three pillars:

1. Protect against human rights abuses;
2. Respect human rights in all activities; and
3. Remedy adverse impacts through grievance mechanisms

2.0 OBJECTIVE



Visual 1: Human Rights Pillar

The Group's Human Rights Policy ("this Policy") reflects its sustainability goals of Uplifting Communities (please refer to Visual 1 for Human Rights Pillar). The goals are outlined as follows:

- Protect stakeholders against injustice and human rights violations;
- Respect applicable laws and regulations;
- Establish a diverse, inclusive workforce with freedom of association;
- Protect stakeholders against injustice and human rights violations;
- Respect applicable laws and regulations; and
- Establish a diverse, inclusive workforce with freedom of association

3.0 SCOPE AND COVERAGE

This Policy is applicable to all employees within the organisation, including permanent and temporary employees, probationary, contract employees, interns and Board of Directors

The Group upholds its commitment to human rights by extending this Policy to the surrounding communities it operates as well as to suppliers, vendors, contractors and business partners in the value chain. Business partners shall include, but not limited to, governments, clients, local communities (e.g., indigenous people, refugees and people with diverse abilities) and joint ventures, ensuring they align with the Group's responsible and ethical business practices.

Business partners are expected to comply to the applicable labour laws including workers' right to fair compensation by ensuring payment of at least the legal minimum wage and by promoting responsible wage practices across their operations.

4.0 THE GROUP'S COMMITMENTS

The Group's commitment to human rights is guided by the following principles:

- a) **Respect and Accountability** – Uphold human rights by identifying, preventing, mitigating, and addressing any adverse human rights impacts arising from our business activities.
- b) **Integration in Decision-Making** – Proactively incorporate human rights considerations into our decision-making processes.
- c) **Risk-Based Assessment** – Evaluate actual and potential human rights risks across the Group using a risk-based approach.
- d) **Mitigation and Remediation** – Implement appropriate measures to reduce adverse human rights impacts and, where necessary, provide or support remediation in line with our responsibilities.
- e) **Holistic Approach** – Ensure that our policies and business decisions contribute to a fair and just transition.
- f) **Monitoring and Evaluation** – Continuously assess the effectiveness of our actions in addressing human rights concerns.
- g) **Transparency and Communication** – Maintain openness about human rights impacts and clearly communicate how the Group fulfils the commitment to respecting human rights.
- h) **Stakeholder Engagement** – Collaborate actively with business partners and stakeholders to enhance human rights awareness and practices.

5.0 STANDARDS

a) Diversity and Equal Opportunity

The Group is committed to fostering a diverse and inclusive workplace where all employees are provided with equal opportunities for career growth based on their skills and experience. Discrimination, harassment, or any form of ridicule related to personal characteristics including gender, age, race, religion, nationality, sexual orientation, or disability will not be tolerated under any circumstances.

The Group supports fair access to employment opportunities and seeks to avoid exclusion of under-privileged or marginalised groups. Where feasible, the Group endeavours to promote inclusive employment practices that support workforce diversity and equal access to opportunities.

b) Safety and Health

The Group proactively implements measures to mitigate potential risks of accidents and injuries to employees, in accordance with the guidelines set forth in the Safety and Health Administration Policy.

c) Workplace Security

The Group is dedicated to ensuring a safe and secure work environment, free from violence, harassment, bullying, intimidation, and any other unsafe or disruptive conditions arising from internal or external threats.

d) Children Rights

The Group strictly prohibits the employment and deployment of child labour across all business operations. The minimum age for employment shall be determined in accordance with the Children and Young Persons (Employment) Act 1966.

The Group recognizes that children are entitled to special protection and care and affirms its commitment to respecting, supporting, and promoting children's rights in all aspects of its operations and business relationships.

The Group is committed to:

- Prohibiting all forms of child labour and preventing the exploitation of children within its operations and supply chains;

- Ensuring that business activities, products, services, marketing practices, and community engagements do not harm or negatively impact children;
- Taking appropriate measures to identify, prevent, mitigate, and address actual or potential adverse impacts on children's rights; and
- Working with business partners, suppliers, and stakeholders to promote the protection of children's rights and uphold applicable legal and ethical standards.

e) Community & Business Principles

The Group is committed to fostering strong relationships with the communities in which it operates through active engagement and responsible efforts to minimise any adverse social or business-related impacts.

f) Housing and Amenities

Where the company provides housing and amenities, the Group ensures that workers are accommodated in a safe, comfortable, and well-maintained living environment that supports their well-being.

g) Communities and Indigenous Peoples' Rights

We are committed to protecting the well-being and promoting the socio-economic growth of the local communities in which we operate.

h) Data Protection and Privacy

We are committed to protecting the personal data of our customers, employees, and contracted partners, as well as safeguarding business information from unauthorised access, modification, disclosure, or distribution. Additionally, we uphold fundamental human rights, including the right to privacy and human dignity, for individuals and communities beyond their data.

i) Prevention of Forced labour/Modern Slavery

The Group strictly prohibits any form of work or service that is coerced through threats, penalties, or any means where individuals have not given their voluntary consent.

This prohibition extends to key indicators of forced labour, as outlined by the International Labour Organisation (ILO):

- Exploitation of vulnerability
- Deception of employment terms
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Withholding of wages
- Debt bondage
- Poor and exploitative working or living conditions
- Excessive overtime
- Confiscation of identity documents

The Group committed to comply fully with the provisions of the Employment Act 1955 relating to working hours, rest periods, and overtime. Working hours and overtime are managed in accordance with statutory requirements, and overtime work is compensated at the prescribed rates. The Group ensures that employees are not required to work in excess of legal limits and that all applicable rest days and breaks are observed.

The Group committed to comply fully with all applicable minimum wage requirements under Employment Act 1955 and other relevant labour laws and regulations. Where possible, the Group is committed to providing wages that exceed statutory minimum wage levels in order to support fair compensation and the well-being of its employees.

j) Freedom of Association

The Group is committed to upholding freedom of association and collective bargaining as part of our dedication to fair and equitable treatment of employees. The Group will engage in good-faith collective bargaining with employees who choose to participate. Employees have the right to join or establish trade unions of their choice and negotiate collectively.

k) Conducive Work Environment

The Group is committed to fostering a work environment and conditions that enhance productivity, promote workplace harmony, support work-life balance, and prioritize employee well-being.

6.0 ROLES AND RESPONSIBILITIES

- a) All employees of the Group are expected to uphold the fundamental principles of dignity, respect, and fairness in their interactions with others. They shall conduct themselves in a manner that affirms and protects the human rights of colleagues, business partners, and community stakeholders.
- b) Managers and Heads of Department shall exemplify ethical conduct and act as role models in demonstrating the standards outlined in this Policy. They are responsible for fostering a workplace culture aligned with these principles, facilitating continuous awareness among employees, and ensuring timely and appropriate responses to any breaches or reports of misconduct. They must also ensure that employees who raise concerns or lodge complaints are protected from any form of retaliation or victimisation.
- c) Senior Management is accountable for overseeing the effective implementation of the Group’s human rights commitments, including compliance with applicable legal and regulatory frameworks. They shall promote a culture of respect for human rights by championing training programmes and ensuring adequate resources are allocated to build organisational awareness and competency in this area.
- d) The Human Resources (HR) Department shall be the custodian of this Policy, responsible for assessing its adequacy and effectiveness. HR shall organise periodic training and awareness programmes to ensure all employees understand their obligations under this Policy. All reported concerns or grievances shall be handled impartially and confidentially, ensuring that all relevant parties are afforded the opportunity to be heard. Where breaches are substantiated, HR shall take the necessary corrective or disciplinary action in accordance with Group procedures.

Individual	Areas of Responsibilities
Employee	All employees are required to read and understand the Human Rights Policy Treat everyone with respect and dignity.
Managers and Heads of Department	Demonstrate exemplary conduct that reflects the values of this policy. Actively engage in educating employees and raising awareness of its provisions. Respond promptly and impartially to any instances of misconduct or breaches, and ensure that individuals who

Individual	Areas of Responsibilities
	voice concerns or lodge complaints are protected from retaliation or unfair treatment.
Senior Management Team	Ensure the effective implementation of human rights standards and compliance with legal obligations, while promoting awareness through support for training programmes and the provision of resources that strengthen employee understanding and application of human rights principles and practices.
HR Department	Monitor and evaluate the adequacy and effectiveness of this policy to ensure it remains fit for purpose. Promote awareness among staff to foster a clear understanding of its provisions. Address complaints impartially, ensuring all relevant parties are given the opportunity to be heard, and take appropriate disciplinary action in cases of policy violations.

7.0 REPORTING PROCEDURES

Any employee who experiences or witnesses' discrimination or harassment is encouraged to report the matter to their superior in accordance with the grievance procedure or raise concerns through the designated whistleblowing channel without fear of retaliation or unfair treatment. The Group is committed to thoroughly investigating all reports, addressing concerns, and taking appropriate corrective action to uphold this policy.

Grievances regarding the Group can be reported to the Head of Human Resources at hr@jentayu-sustainables.com and the grievance procedures are available via the corporate website: <https://jentayu-sustainables.com/>

8.0 GOVERNANCE AND OVERSIGHT

The Board Nomination and Remuneration Committee is responsible for overseeing the administration and effectiveness of the Human Rights Policy. The Human Resource Department is designated as the policy owner and is tasked with maintaining the Policy, incorporating relevant updates or amendments as required, and ensuring that all changes are communicated to relevant stakeholders through appropriate channels.

9.0 REFERENCES

- United Nations Guiding Principles on Business and Human Rights
- Sustainable Development Goals
- Children and Young Persons (Employment) Act 1966
- United Nations (UN) Universal Declaration of Human Rights
- ILO Convention on Labour Standards
- Employment Act 1955