

POLICY

HUMAN RIGHTS

REFERENCE NO.: SCG-HR-POL-07

EFFECTIVE DATE: 24 August 2026

ISSUE: 01
REV: 01

Approved by SCG BOD on 24 August 2026

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Amendment Record

Pages	Issue / Revision	Revision Details	Issue / Revision Date
ALL	01/00	First Issue	04 Jan 2021
ALL	01/01	1) Referencing International Labour Organization (ILO) in the Introduction (Clause 1.0). 2) Align the scope on the definition of "Associates" (Clause 2.0). 3) Enhancements on Diversity (Clause 3.2A); Confidentiality in handling harassment reports (Clause 3.2C), Modern Slavery (Clause 3.2E). 4) Added Fair Recruitment Practices (Clause 3.2F), Wages, Rest Day and Working Hours (Clause 3.2H) and Welfare and Accommodation (Clause 3.2I) 5) Responsibilities and Reporting has been separated into 2 separate clauses (Clause 5.0 and Clause 6.0). 6) Added References (Clause 8.0). 7) Update the contact for whistleblowing channel	24 Aug 2026

1.0 INTRODUCTION & PURPOSE

At Sunway Construction Group (SCG), we respect and support the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) and the rights of all employees, subcontractors, suppliers as well as our business associates. We use these frameworks to guide the development and implementation of this policy.

2.0 SCOPE

- 2.1 This Policy applies to all SunCon's Directors, Employees, as well as our business associates, including but not limited to business partners, agents, vendors, suppliers, contractors, consultants and any other third-party service providers or persons who perform services for or on behalf of the Group ("**Associates**").
- 2.2 We are committed to working with our SunCon's Directors, Employees and Associates to ensure that they uphold respect for human rights and to encourage them to have similar commitments within their own business practices.

3.0 COMMITMENT

- 3.1 As a responsible global corporate citizen, we shall endeavour to meet standards and practices that are consistent with internationally recognised principles, subject to the laws and regulations or any statutory or modification thereof of the countries and territories in which we operate. We do not tolerate unethical labour practices such as child labour, forced or compulsory labour, restriction of freedom of movement.
- 3.2 We respect the rights of our employees, stakeholders and communities through our commitments which include, but are not limited to:
 - a) **Promoting Diversity and Equal Opportunities:**
We promote diversity and inclusion, and do not tolerate any form of discrimination, harassment, or bullying under any circumstances. This includes, but is not limited to, actions based on national origin, gender, age, ethnicity, race, sexual orientation, or disability.

b) Respecting Freedom of Association and Collective Bargaining:

We respect our employees' rights to join or form labour unions of their choice and to bargain collectively without fear of reprisal, intimidation or harassment. Where the right to freedom of association and collective bargaining are restricted under applicable law, parallel means of independent and free association and bargaining will be made available to all such employees.

c) Eradicating any form of Harassment or Abuses:

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 in a confidential and discreet manner.

d) Enhancing Safety and Health:

We strive to provide a safe, secure and conducive workplace environment. Every employee must diligently observe and comply with all Occupational Health, Safety and Environment laws and regulations of any country they are working in as well as the Group's policies and procedures as safety and health is everyone's responsibility.

e) Preventing Forced/Compulsory Labour and Modern Slavery:

SCG strictly prohibits all forms of modern slavery, including forced or compulsory labour, bonded labour or human trafficking, in line with the indicators established by International Labour Organization (ILO). SCG and our Associates shall not knowingly use or promote the use of forced or bonded labour and shall take appropriate measures to prevent the use of such labour in connection with their activities.

f) Fair Recruitment Practices

We promote responsible and ethical recruitment practices. SCG adopts a strict Zero Recruitment Fee Principle whereby no Employees shall bear any cost for the purpose of obtaining employment.

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g) Protecting the Rights of Children:

We will 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 ILO. We are committed to ensuring that no children are employed directly by SCG or our Associates.

h) Wages, Rest Days and Working Hours

SCG complies with all applicable laws governing the minimum wage statutory order, normal working hours, rest days, and overtime.

i) Welfare and Accommodation

All housing and amenities provided by SCG shall comply with the Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446) and all applicable laws, and meet standards of safety, hygiene, and habitability. Basic accommodation is provided at no cost to employees.

4.0 IMPLEMENTATION

4.1 Our approach to prevent negative impacts to human rights is in three parts:

- a) a public commitment to respect human rights
- b) an ongoing process of human rights due diligence
- c) a process for providing access to remedy to anyone who is harmed where the harm is caused or contributed directly or indirectly by the business activities.

4.2 We commit to periodic reviews and assessments of our business activities to identify both positive and negative impacts on human rights; and subsequently to integrate the mitigating outcomes into our internal control systems where appropriate.

4.3 Through awareness and training and communication initiatives, we shall engage and educate all levels of the workforce within SCG to enable them to understand their responsibility in respect of human rights and to empower them to positively influence and encourage our business partners.

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5.0 RESPONSIBILITIES

The responsibility to respect human rights resides in all our SunCon's Directors, Employees, Associates. Oversight of this Policy is led by the Board of Directors and the Sustainability Committee (SC). The implementation and management of this Policy are led by the Human Resources Department and Sustainability Department, with support from Management and Business Units.

6.0 REPORTING AND GRIEVANCE MECHANISM

Within SCG, there are firmly established grievance procedures and whistleblowing channels in line with our Whistleblowing Policy, which are accessible to all our employees and external parties. The whistleblower, regardless an employee, associate or community member, will be accorded with protection of confidentiality of identity, be protected against any adverse and detrimental actions for disclosing any improper conduct committed.

We commit to investigate all violations of this policy reported through the following channels:

- a) **Whistleblowing Hotline:** +603 5639 8033
- b) **Email:** whistleblowing.SCG@sunway.com.my
- c) **Direct Contact:** Head of Internal Audit – SCG or
The Chairman of Audit Committee – SCG
+603 5639 8301
- d) **Mail :** Internal Audit Department
Level 4.2, Menara Sunway,
Jalan Lagoon Timur, Bandar Sunway,
47500 Selangor Darul Ehsan, Malaysia

7.0 POLICY REVIEW

- 7.1 This policy shall be reviewed regularly, once in every three (3) years, or earlier if required, by changes in laws, regulations, standards, or circumstances to ensure its continued relevance. Any amendments upon review must be presented to the Sustainability Committee (SC), approved by the Directors and communicated to Employees and Associates.

8.0 REFERENCES

8.1 All regulations listed under this Clause are as per their latest amendments:

- a) United Nations (UN) Universal Declaration of Human Rights
- b) United Nations Guiding Principles on Business and Human Rights
- c) United Nations Convention on the Rights of the Child
- d) International Labour Organization (ILO)
- e) National Wages Consultative Council Act 2011 (Act 732)
- f) Employment Act 1955 (Act 265)
- g) Children and Young Persons (Employment) Act 1966
- h) Workers' Minimum Standards of Housing and Amenities Act 1990 (Act 446)

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9.0 EFFECTIVE DATE

This policy is approved by the Board of Directors of Sunway Construction Group Berhad and effective as of 24 August 2026.

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