



**UEM EDGENTA  
BERHAD**

**196301000166 (5067-M)**

(Incorporated in  
Malaysia)

# **HUMAN RIGHTS POLICY**

**MARCH 2025**

# UEM Edgenta Human Rights Policy

## Introduction

UEM Edgenta Berhad and its subsidiaries (“**UEM Edgenta**”) recognise that they have a duty to respect and uphold human rights, which means to address infringements on the human rights of others and to address these impacts, where they occur. In this connection, UEM Edgenta has decided to embark on a journey to ensuring human rights is respected and protected within its community, by enacting the **UEM EDGENTA HUMAN RIGHTS POLICY** (“**the Policy**”). In so doing, UEM Edgenta will adopt the definition of human rights as stipulated under Section 2 of the Human Rights Commission of Malaysia Act 1999 (which refers to the fundamental liberties as enshrined in Part 2 of Malaysia’s Federal Constitution), which includes :-

- (i) Liberty of the person
- (ii) Prohibition on slavery and forced labour
- (iii) Protection against retrospective criminal laws and repeated trials
- (iv) Equality
- (v) Prohibition of banishment and freedom of movement
- (vi) Freedom of speech, assembly and association
- (vii) Freedom of religion
- (viii) Rights in respect of education
- (ix) Rights to property

UEM Edgenta’s commitment towards human rights includes its pledge to respect and uphold the principles as enunciated in the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights (UNGPs), and the International Labour Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work.

## Scope of the Policy

UEM Edgenta’s commitment to respect and protect human rights are applicable to the following stakeholders/parties:-

- (i) UEM Edgenta’s Board of Directors;
- (ii) Employees of entities within UEM Edgenta, including its subsidiaries;
- (iii) UEM Edgenta’s Business Partners (such as suppliers, contractors, consultants, partners, agents and/or other business partners) – refer also to our Code of Conduct for Business Partners; and
- (iv) Third party service providers.

Currently, the Policy is only applicable to UEM Edgenta and its subsidiaries in Malaysia. Notwithstanding that, it may be modified in the future to apply to its foreign subsidiaries in line with the respective local circumstances and laws. Such additional information shall be included in Annexures to this Policy.

## Commitments

As prefaced in the Introduction, UEM Edgenta is committed to respecting and upholding the principles as stated in the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights (UNGPs), and the ILO Declaration on Fundamental Principles and Rights at Work. Accordingly, UEM Edgenta's commitment to the cause includes, but is not limited to the following:-

### (i) Providing Equal Opportunities / Non-Discrimination

*UEM Edgenta respects each individual's human rights and will not discriminate on the basis of race, colour, religion, creed, sex, age, social status, family origin, or physical or mental disability, nor will we commit other violations of human rights. Such discrimination will not be tolerated. We are resolute in upholding human rights in all our actions and will not condone discrimination by others. Ignorance and inaction are not acceptable excuses for discrimination. Our commitment here shall supplement our Diversity, Equity and Inclusion Statement published on UEM Edgenta's website (<https://www.uemedgenta.com/about-us/corporate-governance>).*

### (ii) Freedom of Association and Collective Bargaining

*UEM Edgenta reaffirms its support for fundamental human rights in the workplace, in particular freedom of association and the right to collective bargaining. In this connection, the rights of its employees to choose to be a member of a trade union and to bargain collectively as permitted by local employment laws and regulations shall be respected at all times.*

### (iii) Safe and Healthy Workplace

*UEM Edgenta reaffirms the employee's right to return home safely and in good health at the end of each day. We are committed to minimising risks and prioritising the well-being of all employees impacted by our operations, this includes the physical security, mental and emotional state of the employee. We strive to plan and execute all work with safety and health as core priorities from the outset – for everyone involved. In this connection, UEM Edgenta will endeavour to ensure compliance with the Occupational Safety and Health Act 1994.*

**(iv) Prohibition against Forced Labour and Human Trafficking**

*UEM Edgenta enforces a zero-tolerance approach against forced labour and human trafficking, and shall ensure our operations continue to be free from these practices. We will also collaborate with our business partners to promote the eradication of forced labour and human trafficking, if any. The foregoing commitments shall apply equally to the rights of children. As far as practicable, we will actively and progressively engage with our supply chain to address these potential issues.*

**(v) Elimination of Harassment, Bullying and Violence**

*UEM Edgenta is committed to ensuring that all employees, including those within its subsidiaries, are treated with respect and dignity. We will strive to maintain a work environment that is free from all forms of harassment, whether physical, verbal, psychological, sexual or otherwise.*

**(vi) Privacy / Data Protection**

*UEM Edgenta will endeavour to ensure that all commercial transactions and matters connected therewith and incidental thereto involving itself, its subsidiaries and its business partners, will be in compliance with the Personal Data Principles as envisioned under the Personal Data Protection Act 2010. This commitment shall supplement our Privacy Policy published on our website at (<https://www.uemedgenta.com/privacy-policy>).*

**(vii) Fair Wages / Compensation / Working Hours / Rest Periods / Leave**

*UEM Edgenta is committed to guaranteeing that all its employees, receive fair wages and equitable compensation. This commitment includes adherence to the minimum standards prescribed under Malaysian employment laws, such as the Employment Act 1955 and the Minimum Wages Order 2022, established pursuant to the National Wages Consultative Council Act 2011.*

**(viii) Fair Treatment of Migrant Workers**

*UEM Edgenta is dedicated to ensuring that migrant workers are treated fairly and with dignity. This includes providing them with wages, benefits, and working conditions that not only comply with Malaysian laws but also align with the international labour standards. We are further committed to promoting equity and fairness, ensuring that migrant workers receive the same respect and protections as all other employees.*

**(ix) Protection of Communities and Environment**

*UEM Edgenta is committed, as far as practicable, to safeguarding the rights and well-being of minority and indigenous communities in Malaysia, particularly those impacted by our operations. These commitments include protecting their cultural heritage, livelihoods, and environments. As far as practicable, we will take proactive measures to minimise any environmental impact on these communities, ensuring that our activities align with principles of sustainability and respect for their rights. We will strive to engage transparently with these communities to address concerns and foster positive, collaborative relationships.*

*This commitment shall supplement our Sustainability Policy published on our website at (<https://www.uemedgenta.com/about-us/corporate-governance>).*

**(x) Implementation of Ethical Marketing**

*UEM Edgenta will seek to promote ethical marketing which entails promoting honest, trustworthy, fair and responsible marketing whilst respecting human rights and dignity. Such commitment will supplement our Code of Conduct for Business Partners published on UEM Edgenta's website (<https://www.uemedgenta.com/about-us/corporate-governance>).*

**Implementation of the Policy**

- (a) Through the publication of this Policy, UEM Edgenta affirms its commitment to respecting, promoting, and upholding human rights. This declaration underscores our dedication to upholding human rights principles in our operations, as well as fostering a culture of fairness, dignity, and respect for all individuals.
- (b) In order to identify, prevent, mitigate and account for adverse human rights impacts, UEM Edgenta shall continue to carry out Human Rights Due Diligence (“HRDD”). Such HRDD shall be conducted on an ongoing basis, recognising that human rights risks may change over time as UEM Edgenta and its subsidiaries operations and operating context evolve. Our HRDD as far as practicable will cover adverse human rights impacts that we may cause or contribute to through our activities, or which may be directly linked to our operations, products or services by our business partners.
- (c) UEM Edgenta will have in place mechanisms to identify, report, and remediate any adverse impacts on human rights caused by its operations, subsidiaries, or business partners. More information on these processes can be found in ‘Responsibilities, Reporting and Remediation’.

- (d) Where practicable, UEM Edgenta will actively engage in stakeholder consultations to foster meaningful relationships across its group structure, ensuring alignment with and adherence to this Policy.
- (e) UEM Edgenta will regularly review its training programmes to integrate and reinforce human rights principles, ensuring that all employees and stakeholders are well-informed and equipped to uphold these standards.
- (f) UEM Edgenta is committed to ensuring full compliance with local employment laws and standards, reflecting its dedication to lawful and ethical practices in all areas of operation.

### Oversight of the Policy

Responsibility for overseeing this Policy will reside with UEM Edgenta's Board Governance and Risk Committee ("BGRC") and the Human Resource Department, which will ensure its effective implementation and alignment with our governance and risk management objectives.

Comprehensive Internal Audit Reviews will be conducted by UEM Edgenta and submitted to the BGRC and Board Audit Committee ("BAC") for thorough internal review and evaluation. These reports will form a critical component of our ongoing HRDD processes, ensuring continuous improvement and accountability.

### Responsibilities, Reporting and Remediation

All stakeholders of UEM Edgenta (as per 'Scope of the Policy') are expected to actively respect, uphold, and champion the human rights principles outlined in this Policy. This commitment is integral to our corporate culture, and each individual has a responsibility to contribute to fostering an environment of fairness, dignity, and respect.

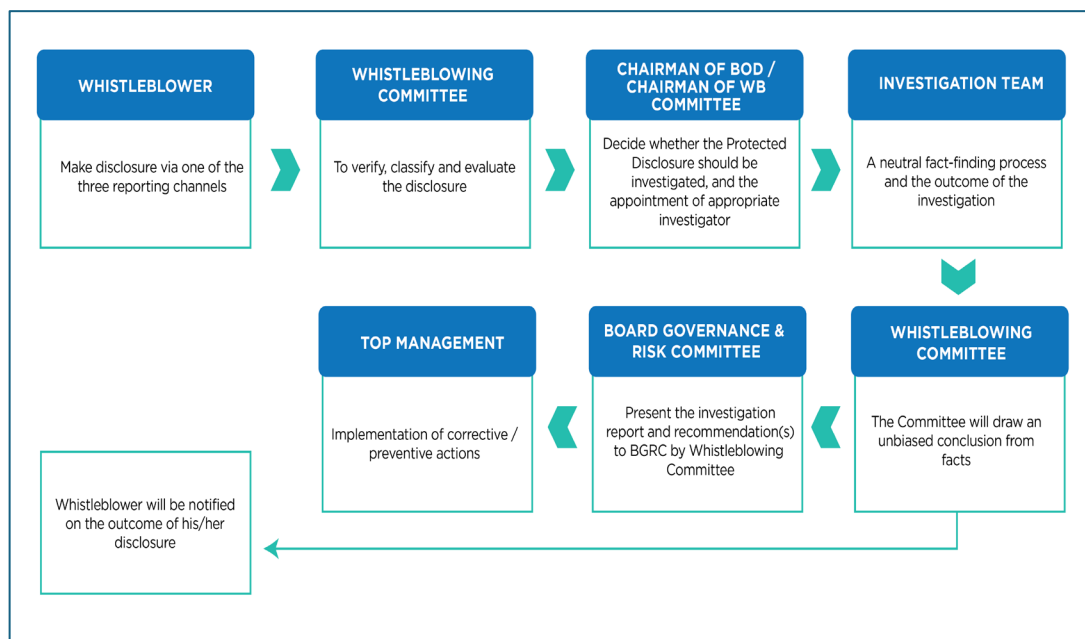
All stakeholders of UEM Edgenta (as per 'Scope of the Policy') who have knowledge or are aware of any improper conduct(s) committed or about to be committed within UEM Edgenta's structure are encouraged to report such matters, in good faith without fear of reprisal through our Whistleblowing Channels. All whistleblowing reports are **strictly confidential** and anonymity of identities of reporting parties shall be guaranteed.

### Whistleblowing Channels

| Mechanism | Reporting Channel  |
|-----------|--|
| Email     | <a href="mailto:whistleblowing@edgenta.com">whistleblowing@edgenta.com</a>   |
| Writing   | Whistleblowing Lodgement Form as provided in UEM Edgenta's website at<br><br><a href="https://www.uemedgenta.com/whistleblowing">https://www.uemedgenta.com/whistleblowing</a> |
| Call      | +6019 209 9030<br><br>Monday to Friday, 8:30 am - 5:30 pm (Malaysian Time)   |

### Whistleblowing Process

Any conduct inconsistent with this Policy, reported through UEM Edgenta's Whistleblowing Channels shall be assessed and investigated in accordance with the Whistleblowing Process (UEMED/MSP/RICD/06/WB).



For further information, the Group's Whistleblowing Policy Statement can be found at our website ([www.uemedgenta.com/whistleblowing](https://www.uemedgenta.com/whistleblowing)).

### Remediation Process

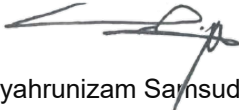
As far as practicable, UEM Edgenta will actively engage in comprehensive remediation processes when breaches of human rights are identified. These processes may include, but are not limited to, the following actions:-

**(a) Employee Breach**

Potential disciplinary action in accordance with company policies, which may include counselling, retraining, suspension, or termination for misconduct, depending on the severity of the violation.

**(b) Business Partner Breach**

A re-evaluation of the business relationship, which may involve reassessing contractual terms, implementing corrective actions, or, in extremely severe cases, terminating the partnership to ensure alignment with our human rights standards and values as stipulated under this Policy.



Syahrulizam Samsudin  
Managing Director / Chief Executive Officer  
UEM Edgenta

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