



# Human Rights Statement

**STEEL HAWK** is committed to respect and promote human rights and acknowledges that promoting human rights is fundamental for carrying out its business in a responsible manner.

**STEEL HAWK** respects human rights by seeking to avoid infringing on the rights of others and working to address adverse human rights impacts with which the company can be involved. The Human Rights Statement applies to all employees and entities within **STEEL HAWK**, and to all the company's stakeholder relationships. **STEEL HAWK** works with and encourages its business partners to uphold the principles in this statement within their businesses.

## **Basis for STEEL HAWK's commitment to human rights**

As a company and employer, **STEEL HAWK** respects and promotes the protection of human rights as expressed in all internationally recognized human rights declarations and conventions such as the UN Universal Declaration of Human Rights, the UN Covenant on Civil and Political Rights, the UN Covenant on Economic, Social and Cultural Rights and the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work. **STEEL HAWK** also operates according to and promotes the principles described in the United Nation's (UN) Guiding Principles on Business and Human Rights.

**STEEL HAWK's** commitment to respect and promote human rights is fully integrated into company's operating policies, such as the **STEEL HAWK Code of Conduct** and **STEEL HAWK Zero Agression Policy** and other related guidelines. **STEEL HAWK** operates in full compliance with all applicable national and international laws, regulations and generally accepted practices and our own Code of Conduct, whichever sets higher standards.

## **Enforcement of the commitment**

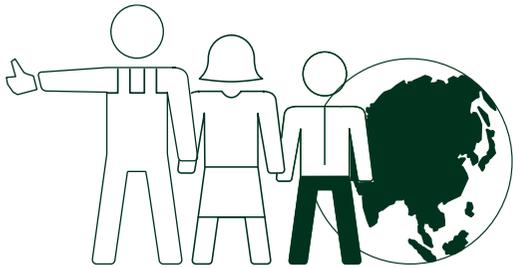
To ensure compliance with its human rights-related commitments in its own operations, **STEEL HAWK** has a process for human rights due diligence. The process is based on the UN Guiding Principles on Business and Human Rights. **STEEL HAWK's** human rights due diligence process includes the following elements:

- Commitment to **STEEL HAWK's** Human Rights Statement and other related policies and guidelines ensuring human rights compliance
- Human rights impact assessment including local site-level assessments conducted by a third party
- Reviewing human rights action plan every three years
- Monitoring the progress of the action plans
- Transparent communications and reporting
- Maintaining guidelines ensuring access to remedy

In all its business relations, **STEEL HAWK** requires its business partners to respect all internationally recognized human rights and comply with the international principles related to human rights. Furthermore, the company's suppliers are required to comply with **STEEL HAWK's** Procurement Policy, and the company has built a comprehensive process for ensuring a sustainable supply chain. The process includes suppliers' commitment to policies, risk assessments, supplier self-assessments, and supplier sustainability audits executed with a third party. Compliance with **STEEL HAWK's** policies is the starting point for entering and maintaining any kind of business relationship with **STEEL HAWK**. We expect all our suppliers to comply with the requirements in the policy, and we have zero tolerance towards the use of forced labor or child labor.

**STEEL HAWK** encourages its employees and stakeholders to speak up and voice their concerns. The processes to report misconduct are described in detail in our Code of Conduct.

**DATO' SHARMAN K MICHAEL**  
**EXECUTIVE DIRECTOR**  
**STEEL HAWK ENGINEERING SDN BHD**  
**1 JUNE 2021**



# **LABOUR & HUMAN RIGHTS POLICY**

## INTRODUCTION AND PURPOSE

The **STEEL HAWK**'s employees are of great value and the key to our success. The Group must strive to provide a workplace where employees can fulfil their potential in an open and inspirational working environment. We must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in the Group.

The purpose of this policy is to define the labour and human rights standards to which all employees in the **STEEL HAWK** Group are entitled, irrespective of the country in which they work.

## SCOPE

This policy applies to the management, employees and contract workers of all entities in the **STEEL HAWK** Group.

Where the **STEEL HAWK** Group participates in existing joint ventures as a non-controlling shareholder, the other shareholder(s) shall be made specifically aware about the significance to **STEEL HAWK** of the policy and shall be encouraged to apply the same policy or a similar standard to the joint venture. For contemplated new minority joint venture cooperations, **STEEL HAWK** shall strive to commit the other shareholder(s) to adopt the policy or a similar standard for the joint venture.

# REQUIREMENTS

## 1. NON-DISCRIMINATION

**1.1.** Does not tolerate any form of discrimination against our employees based on race, colour, gender, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability, or other distinguishing characteristics.

**1.2.** Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria.

## 2. FORCED LABOUR

**2.1.** Does not tolerate any form of forced labour including bonded labour, indentured labour and slave labour, or human trafficking. Workers must be allowed to move around freely and leave their place of work when their working hours end.

## 3. CHILD LABOUR

**3.1.** Does not tolerate the hiring of child labour under any circumstances. The minimum age for full-time employment must be 18 or the legal minimum age for employment under Applicable Law, whichever is higher. The Group must not hire employees under the age of 18 for positions requiring hazardous work that could jeopardise health, safety or morals.

## 4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

**4.1.** Must respect employees' rights to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment.

## 5. HARASSMENT

**5.1.** Must protect workers from any acts of physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace by either their fellow employees or managers.

## 6. WORKING HOURS, BENEFITS AND WAGES

**6.1.** Must adhere to the stricter of Applicable laws or industry standards, relating to minimum wages, working hours, overtime and benefits.

**6.2.** Employees must not be required to work more than 60 hours a week, including overtime, on a regular basis (or more than the limits on regular hours and overtime allowed by local laws and regulations).

**6.3.** Wages for overtime must be paid in legal tender on a regular basis. Wage deductions as a disciplinary measure must not be permitted unless provided for by national law. Employees must be entitled to at least one day off in seven, and must be given reasonable breaks while working and sufficient rest periods between shifts.

**6.4.** Must be committed to continuously developing employee skills and capabilities, and to providing opportunities for career advancement.

**6.5.** In the event of major layoffs, the Group must, as a minimum, satisfy applicable laws and industry standards.

## **7. LEAVE**

**7.1.** Must ensure that all employees have the right to sick leave and annual holiday, as well as parental leave for employees who have to care for a new-born or newly adopted child as provided by national legislation. Employees who take such leave must not, as a result, face dismissal or threat of dismissal.

## **8. EMPLOYEE CONTRACTS/LETTERS**

**8.1.** All employees must be provided with a written, understandable and legally binding employment contract/letter.

## **DEVIATIONS**

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

## **POLICY REVISION**

This policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.

## **CONTACT**

For more information, please contact the Local HR manager or Group HR.