Title	**Policy – Corporate Social Responsibility Code of Conduct**
Policy No.	**HCD-PL-008-R5**
Category	**Human Capital Department**
Approved by	**Senior General Manager – Human Capital**
Date Policy Took Effect	**01 January 2022**
Review Date	**01 December 2023**

Introduction

GSPP Holdings Sdn Bhd (GSPP) and its Subsidiaries set out to establish the Code of Conduct emphasizing on operational ethics where GSPP and its Suppliers and Subcontractors shall comply with all norms and legal requirements relevant to their business in line with international business standards and human rights values.

GSPP shall comply with the Code as a total supply chain initiative. GSPP shall also require its next tier Suppliers to acknowledge and implement the Codes to fulfil all of its activities and must operate in full compliance with the laws, rules and regulations of the countries in which it operates. Suppliers are obliged to ensure that the standards set out in the Code of Conduct are not only observed in their own facilities but also communicated to their own suppliers.

Policies

1.0 Freely Chosen Employment

All work shall be entered freely and voluntarily. There will be no forced, bonded, indentured, involuntary prison labour, slavery or trafficking of persons.

Any recruitment fees, payment to employers or other related fees for employment shall not be paid by the workers. Workers must have full access to their personal identification documents at all time. Workers shall be free to terminate their employment by giving reasonable notice to the company without fear of penalty.

2.0 No Child Labour

The employment of a person who is 18 years old and above in GSPP is primarily covered under Employment Act 1955.

The employment of children and young persons in GSPP is ensured according to the Children and Young Persons (Employment) Act 1966 (CAYPEA). A ‘child’ refers to a person under the age of 15 years old, whereas a ‘young person’ refers to a person who is 15 years old or above but under the age of 18 years old, as seen in Section 1A of the CAYPEA amended by virtue of the 2019 Amendments.

3.0 Working Hours, Wages and Benefit

Working hours shall not be excessive and shall be in line with national limits. Overtime must be voluntary and paid at a premium rate in line with legal requirements. All workers must receive at least one rest day in every seven days.

Only workers with legal rights to work shall be employed. All workers shall be briefed and provided with written and understandable information e.g. employment contract about their wages and legally mandated benefits before they sign their employment contract, including any overtime rates and circumstances where pay may be deducted.

Workers shall be entitled to paid annual leave, public holidays, medical leave and benefits in accordance with National laws.

Deduction from wages as disciplinary measure shall not be allowed if not legally permitted, and even where legally permitted, should be minimised.

For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

4.0 No Discrimination / No Harassment

GSPP is committed to a workplace free of harassment and will not discriminate against their workers or any potential employees during the hiring process. This includes remuneration or access to training, promotion, overtime, termination or retirement based on race, ethnicity, national origin, age, religion, disability, gender, gender identity, marital status, sexual orientation or political affiliation. Men and women of all nationalities will receive equal remuneration for work of equal value.

In addition, workers or potential employees should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

Workers shall be provided with reasonable accommodation for religious practices.

5.0 Humane Treatment

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the treat of any such treatment.

6.0 Sanitation, Food and Worker Accommodation

Workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Any accommodation provided for workers must be safe, clean and suitable for residential use, in line with the recently enforced Act 446. Employees' Minimum Standards of Housing, Accommodation and Amenities Act 1990.

Accommodation must be separate from productions areas and segregated by gender. Each worker must have their own bed. Toilets and showers must be kept clean and separated by gender.

7.0 Fair Disciplinary Practices

Physical abuse, discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Disciplinary procedures should always include an escalating series of verbal and written warnings including an internal enquiry prior to suspension or dismissal. Workers and supervisors should be made aware of the employer's grievance procedures and have the right to lodge complaints regarding disciplinary issues without fear of retaliation.

8.0 Compliance with National Law and Related Regulation

GSPP comprehensive handbook stipulated the required obligation of an employer and the employee. The handbook will be amended from time to time in line with national law.

9.0 Respect Freedom Of Association and The Effective Right To Collective Bargaining

GSPP has established the Joint Consultative Committee (JCC) among the Management and employees in order to communicate, bridging the needs and understanding of both parties, & policy consultation.

JCC members are elected democratically in a free and fair election among employees. This is to ensure capable and trusted leaders are elected and are able to represent the will and need of GSPP employees.

10.0 Occupational Safety & Health

GSPP shall comply with relevant laws and regulations to ensure workers operate in safe working environment where appropriate measures are in place to prevent any work-related accidents.

GSPP shall provide workers with appropriate workplace health & safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards.

Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Workers are encouraged to raise any health and safety concerns without retaliation.

11.0 Environment

GSPP has a responsibility to protect human health and the environment by meeting applicable environmental legislation including air emissions, solid/hazardous waste and water discharge.

The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

12.0 Occupational Injury and Illness

Procedures and systems are in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

13.0 Business Integrity

The highest standards of integrity are to be upheld in all business interactions. GSPP shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted.

Standards of fair business, advertising and competition are to be upheld.

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. GSPP is having a communication process for the personnel to be able to raise any concerns without fear of retaliation.

14.0 Privacy & Data Protection

GSPP shall commit to protecting the reasonable privacy expectations of everyone they do business with, including suppliers, customers and employees. GSPP shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

15.0 Anti-Bribery and Transparency

GSPP will not tolerate, permit or engage in bribery, corruption or unethical practices with public officials or individuals in the private sector.

GSPP shall have programs and reporting channel in place to ensure that whistle blowers may raise concerns confidentially, anonymously and without fear of retaliation as permitted by law.

16.0 Protection of Identity and Non-Retaliation

GSPP shall ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers' are to be maintained, unless prohibited by law.

GSPP will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm.

17.0 Material Restrictions & Responsible Sourcing of Materials

GSPP shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

Materials and minerals in GSPP products must be sourced in an environmentally responsible manner and in safe working conditions where work is chosen freely.

GSPP shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold (3TG) in the products we manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Cooperation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognised due diligence framework.

18.0 Management Systems

GSPP shall establish a management system with a scope that is related to the content of this Code.

The management system shall be designed to ensure:

(a) compliance with applicable laws, regulations and customer requirements related to the GSPP's operations and products;
(b) conformance with this Code; and
(c) identification and mitigation of operational risks related to this Code.

It should also facilitate continual improvement.

19.0 Code of Conduct Implementation

Suppliers must establish internal management systems and processes to ensure that the requirements of GSPP Code of Conduct are observed.

In order to ensure that the requirements in the Code of Conduct are met in the supply chain, GSPP reserves the right to audit or authorise a third party to audit any Supplier that is engaged in the production, processing, service or supply of materials for GSPP products, services and technology.

All GSPP's audits shall require full cooperation from the Suppliers and may include any subcontractor or labour agent used by the Supplier. Audits may occur with or without advance notice.

All Suppliers must observe strict compliance of this Code of Conduct and any breach of the same may be regarded as a material breach of the Supplier's contract/agreement with GSPP. Upon review of audit results and whenever appropriate, GSPP shall provide a mechanism to rectify the breach or incompliance with Code of Conduct within a period of three (3) months to resolve the issue. After the given period, if Supplier failed to comply without an acceptable justification, GSPP at its sole discretion may cancel a purchase order or terminate any existing contract/agreement entered with the Supplier.

Approved by



Mitzvah Mohamed Tajudin
Senior General Manager-Human Capital

SUPPLIER ACKNOWLEDGEMENT

We have received the GSPP Corporate Social Responsibility Code of Conduct and understand that compliance is a fundamental condition of the contractual relationship with GSPP.

Supplier Name : _____

Facility Address : _____

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Phone : _____

Email Address : _____

Signature of Company Director :

_____

Name of Company Director :

Date :