



# ANTI-DISCRIMINATION POLICY

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VERSION 1.0 2023

## 1 POLICY STATEMENT

Mewah International Inc. and its subsidiaries (“Mewah”, “the Group”, “we” or “our”) value all employees as unique individuals, and we welcome the variety of experiences they bring to our company. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices. Mewah expects that all relationships among persons in the Group will be business-like and free of explicit bias and prejudice. The Group will operate a zero-tolerance policy against all forms of discrimination in the workplace, treat all incidents seriously and will promptly investigate all of such allegations or complaints.

The Group’s Anti-Discrimination Policy (“**this Policy**”) principles and rules apply to all the Group’s employee, regardless of their positions, status or gender. All employees are covered by and are expected to comply with this Policy and to take appropriate measure to ensure such conduct does not occur. The Group is guided by this Policy to support our core values which are outlined below:

**M**otivation      **E**ngagement      **W**isdom      **A**spiration      **H**onor

The Group highlighted “Honor” as one of our core values as we acknowledge and honor multiple religious and cultural practices. With this core value in the heart of the Group, we will make sure all of our employees feel included and respected regardless of their age, gender, race, religion, cultural background or country origin. We believe creating an inclusive culture will ensure all employees can be connected with equal opportunity and create a healthier, more successful future together with us. We must always comply with this Policy and all relevant anti-discrimination laws) and other similar regulations where we do business and work in the Group.

This Policy is not intended to provide definitive answers to all questions regarding discrimination. Rather, it is intended to provide employees with a basic introduction to understand that all employees have a legal right to a workplace free from discrimination of any kind and how the Group combats them in furtherance of the Group’s commitment to create a safe, healthy, and discrimination free work environment for all employees. If you have any doubt about the scope of applicable laws or the application of the Group’s policies concerning the fight against workplace discrimination, you should contact Legal & Corporate Services Department immediately.

## 2 WHO MUST COMPLY WITH THIS POLICY?

This Policy is intended to apply to every employee in the Group worldwide regardless of their positions, status or gender. As employees of the Group, all employees shall read, understand and comply with the information contained within this Policy. Training or other information on the prevention of discrimination may be given from time to time.

Appropriate disciplinary action will be taken against any employee who violates this Policy. Based on the seriousness of the offense, disciplinary action may include verbal or written warning, suspension, or termination of employment.

## 3 DEFINITION OF DISCRIMINATION

Discrimination is unfavorable action or attitude directed toward a person due to one of the following protected attributes:

- Age
- Disability (including mental, physical, developmental or learning disabilities)
- Employment activity
- Gender
- Marital or relationship status

- Physical features
- Place of origin
- Political belief or activity
- Pregnancy
- Race
- Religion
- Association or relationship with a person identified by one of the above grounds

Discrimination may be intentional or unintentional. We recognize that sometimes discrimination is unintentional, as we may all have unconscious biases that could be difficult to identify and overcome. If we conclude that an employee unconsciously discriminates, we will support them through training and counseling and implement processes that mitigate biases.

## 4 REPORTING ACTUAL OR SUSPECTED WRONGDOINGS

If you are the victim of discriminatory behaviour (or if you suspect, observe or witness others being discriminated against), please report it or make a complaint to your direct superior, managers, Head of Department or seek advice from HR Department.

The Group encourages its employees to use the internal complaints processes to resolve any complaints relating to discrimination, if possible.

When a complaint of discrimination has been received by the direct supervisor, manager, Head of Department or its respective Head of HR Department, such complaint must be acted upon immediately and managed in a sensitive and confidential manner.

Where discrimination is found to be substantiated, the consequences for the person against whom the complaint is made will depend on the particular circumstances. The consequences may include: -

- an apology;
- Referral to counseling;
- One-on-one assessment and training on discrimination and harassment prevention;
- A written warning;
- A final warning letter;
- Suspension of employment;
- Transfer;
- Dismissal; or
- Any other disciplinary action which is appropriate

## 5 RETALIATION PROHIBITED

The Group encourages reporting of all perceived incidents of discrimination. It is the policy of Mewah to promptly and thoroughly investigate such reports or complaints, The Group prohibits retaliation against any individual who reports discrimination or participates in an investigation of such reports.

## 6 COMPLAINT AND INVESTIGATION PROCEDURES

The Group has established the following procedure for investigate a complaint of discrimination. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

When a written complaint of discrimination has been received by direct supervisor, manager, Head of Department or its respective Head of HR Department, such complaint will be referred to a HR manager or an authorised HR person in charge to instigate a formal investigation. If there is a complex scenario involving senior management, the investigation will be carried out by one of the committee members. The committee to inquire into discrimination complaints is comprised of three (3) members selecting between HR managers and senior leadership team (“**Committee**”).

While the process may vary from cases to case, the person carrying out the investigation will do in accordance with the following steps: -

- i. Conduct an immediate review of the allegations and take any interim actions as appropriate during the investigation to refrain any communication between the complainant/victim and the respondent. (eg. internal transfer, temporary suspension of employment, giving administrative leave etc.)
- ii. If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.
- iii. Request and review all relevant documents, including all electronic communications.
- iv. Conduct separate interview with all parties involved including the victim, the respondent and any other third parties or witnesses.
- v. Conduct an interview with other third parties or witness (if deemed necessary).
- vi. Produce a written report (“**Report**”) setting out the following: -
  - a. A list of all documents reviewed, along with a detailed summary of relevant documents;
  - b. A list of names of those interviewed, along with a detailed summary of their statements;
  - c. A timeline of events;
  - d. A summary of prior relevant incidents, reported or unreported; and
  - e. The findings, proposed resolution of the complaint, together with any recommended corrective action(s) (if appropriate).
- vii. Submit the Report to the Committee to decide whether a discrimination has taken place and the appropriate corrective action or punishment. If the Committee thinks there is insufficient information, the Committee may conduct a domestic inquiry by interviewing the complainant, the respondent, and any witnesses to determine whether the alleged conduct occurred.
- viii. Once a final decision is made by the Committee, the HR Department will meet with the complainant and the respondent separately and promptly notify them of the findings of the investigation. If the complaint is proven and a disciplinary action is ought to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.
- ix. Keep a proper record of all actions taken and ensure all the record are kept confidential. Such record will be kept for a minimum of six (6) years after the conclusion of the investigation.
- x. Ensure that the process is done as quickly as possible and in any event **within thirty (30) days of the complaint being made.**

## 7 CONFIDENTIALITY

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the HR Department will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this Policy will be maintained in secure files within the HR department. Such record will be kept for a minimum of six (6) years after the conclusion of the investigation.

## 8 PROTECTIVE MEASURE FOR COMPLAINANT/VICTIM

No hardship, loss, demotion, penalty or other adverse consequences may be imposed on an employee/complainant/victim for: -

- a. Filing or responding to a bona fide complaint of discrimination;
- b. Appearing as a witness in the investigation of a complaint; or
- c. Serving as an investigator of a complaint.

Lodging a bona fide complaint will not be used against the complainant, nor will it adversely affect the complainant's employment status. However, filing groundless or malicious complaints is an abuse of this Policy and will be treated as a violation which will result in disciplinary action, including and up to dismissal.

## **9 CONTINUOUS IMPROVEMENT AND EDUCATIONAL PROGRAMMES**

We strongly believe that prevention is the most effective tool to eradicate discrimination in the workplace. Mewah Group's continuous educational and awareness programmes include training, communication and awareness in form of notice.

Furthermore, Mewah Group committed to continually improving its policies and procedures relating to discrimination to ensure that we meet the objectives of relevant legislations and remain effective for the Group, and, if necessary, implement changes.

This Policy forms part of the Group Personnel's contract of employment and the Group may amend it at any time so as to improve its effectiveness at discrimination.