



WORKPLACE SEXUAL HARASSMENT POLICY

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1 POLICY STATEMENT

Mewah International Inc. and its subsidiaries (“**Mewah**”, “**the Group**”, “**we**” or “**our**”) are committed to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the Group should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. The Group will operate a zero-tolerance policy against all forms of sexual harassment in the workplace, treat all incidents seriously and will promptly investigate all allegations of sexual harassment. The Group will take a strong stance against such acts and any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

The Group’s Workplace Sexual Harassment 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:

Motivation **E**ngagement **W**isdom **A**spiration **H**onor

The Group highlighted “Aspiration” as one of our core values as we aim to create a dynamic environment to inspire and motivate not only for our people, but for our customers and community at large, to continuously change for the better in order to scale new heights. With this core value in the heart of the Group, we will ensure all of our employees are working in a harassment free work environment to boost their confidence over the Group. We must always comply with this Policy and all relevant anti-sexual harassment laws including the Singapore Protection of Harassment Act 2014 (PHA), Malaysian Employment Act 1955 (ACT 265), or other similar anti-sexual harassment regulations where we do business and work in the Group.

This Policy is not intended to provide definitive answers to all questions regarding harassment. 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 sexual harassment and how the Group combats sexual harassment in furtherance of the Group’s commitment to create a safe, healthy and harassment 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 sexual harassment, 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 and every employee are expected to also take appropriate measures to ensure such prohibited conduct does not occur. 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 reprimand, suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate harassment or retaliation, including the failure to immediately report such misconduct to Human Resources department (**HR**), are also in violation of this Policy and subject to discipline.

3 DEFINITION OF SEXUAL HARASSMENT

Sexual harassment is any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to: -

Physical conduct

- Unwelcome physical contact including kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Repeated and unwanted social invitations for dates or physical intimacy
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

4 WHO CAN BE A TARGET OF SEXUAL HARASSMENT?

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. The Group recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

The Group recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee. Anyone, including employees of the Group, clients, customers, casual workers, contractors or visitors who sexually harasses another will be subject to discipline in accordance with this Policy.

All sexual harassment conducts are prohibited whether it takes place within the Group, premises or outside, including at social events, business trips, training sessions or conferences sponsored by Mewah.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favours. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called Quid Pro Quo Harassment.

Any employee who feels harassed should report so that any violation of this Policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this Policy.

5 REPORTING ACTUAL OR SUSPECTED WRONGDOINGS

The Group cannot prevent or remedy sexual harassment conduct unless it knows about it. Reports of sexual harassment can be made verbally or in writing. If such report is received verbally, the complainant must follow up in writing.

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. The Group recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach an alleged harasser, he/she can approach its respective entity Head of HR Department or Head of Department.

Any person who witnesses, observes or suspects that another Mewah's employee or anyone else may be acting in contravention of this Policy has an obligation to report it. Other than its respective Head of HR Department or Head of Department/Immediate Superior, all such concerns may also be reported according to Mewah Group Whistle-Blowing Policy or other existing and similar system/platform.

Reporting should be made without delay as prompt reporting and resolution of sexual harassment issues in many cases are required by applicable law or regulatory requirements.

6 EMPLOYEE RESPONSIBILITIES

As employees of the Group, all employees shall read, understand and comply with the information contained within this Policy, and with training or other information on the prevention of sexual harassment given from time to time.

All employees within the Group are equally responsible for the prevention, detection and reporting of sexual harassment, and are required to avoid any activities that could lead to, or imply, a breach of this Policy. Any employee who fails to report any form of sexual harassment contrary to this Policy, notwithstanding that he/she is not the victim, will be treated as having committed a misconduct and will be subject to disciplinary action.

All direct supervisors, managers and Heads of Department are responsible to ensure that complaints of sexual harassment by their subordinates are handled expeditiously in accordance with this Policy.

All supervisors, managers and Heads of Department who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to his/her Head of Department (if applicable) and/or its respective Head of HR department.

Direct supervisors, managers and Heads of Department who knowingly allow or tolerate sexual harassment, including the failure to immediately report such misconduct to the HR Department, are in violation of this Policy and subject to disciplinary action.

7 RETALIATION/DISCRIMINATION PROHIBITED

Unlawful retaliation can be any action that could discourage an employee from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

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

8 COMPLAINT AND INVESTIGATION PROCEDURES

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

When a written complaint of sexual harassment has been received by the manager/supervisor, 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 sexual harassment 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 alleged harasser. (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 alleged harasser 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 sexual harassment 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 alleged harasser, 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 alleged harasser separately and promptly notify them of the findings of the investigation. If disciplinary action is to be taken, the alleged harasser 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.**

9 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.

10 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 sexual harassment;
- 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.

Nothing in the Policy shall prohibit the complainant from filing a police report, complaining to the Director General of Labour or taking other necessary legal action in response to sexual harassment.

11 DISCIPLINARY PROCEDURE

The Group regards sexual harassment as a serious matter. Upon completion of the investigation, and if the misconduct or sexual harassment is proven, the possible punishment to be imposed on the accused employee could be depending on the circumstances surrounding the matter and the seriousness of the matter including but not limited to: -

- A written warning;
- A final warning letter;
- Suspension of employment;
- Transfer;
- Downgrading or demotion including pay cut;
- Dismissal of employment without any notice; or
- Any other disciplinary action lesser than dismissal or demotion which is appropriate.

12 CONTINUOUS IMPROVEMENT AND EDUCATIONAL PROGRAMMES

We strongly believe that prevention is the most effective tool to eradicate sexual harassment in the workplace. Mewah Group's continuous educational and awareness programmes include training, communication and awareness in form of notice. The training shall be provided during orientation so that employees could be educated in the area of prevention of sexual harassment in workplace. Furthermore, Mewah Group is committed to continually improving its policies and procedures relating to sexual harassment 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 combatting sexual harassment.