



EQUAL EMPLOYMENT OPPORTUNITY POLICY

1. Policy Statement

- 1.1. Suntrack Development Sdn Bhd ("Suntrack") adopts a zero-tolerance stance on any form of discrimination against its employees. Suntrack is committed to the International Labour Organisation ("ILO") conventions in relation to equal employment opportunities ("EEO"), providing a safe working environment free from discrimination on the basis of race, ethnicity, skin colour, religion, gender, sexual orientation, age and marital status. It is Suntrack's objective to provide equal opportunities to all employees with regards to hiring, pay and remuneration rates, training and development, promotions and other terms of employment.
- 1.2. As an equal opportunities employer, Suntrack complies with all applicable laws, rules and regulations in relation to this Policy. The EEO Policy should be read in conjunction with the company's various policies and guidelines.
- 1.3. Suntrack is committed to providing a diverse work environment that values the wide-ranging perspectives inherent to our diversified workforce. The values we encourage in our employees are candour, courtesy, flexibility to adapt to changes and respect to humanity, personal dignity and privacy.
- 1.4. Suntrack's EEO Policy is an embodiment of our objective to lead our workforce and business associates based on meritocracy. Meritocracy is identified to encompass a combination of educational qualifications, cognitive abilities, extra-curricular talents, and socially valuable personal qualities, like leadership and civic-mindedness.

2. Scope

- 2.1. This Policy is applicable to all Suntrack employees ("Personnel") including directors. Suntrack seeks to create awareness amongst its employees on the importance of preventing discrimination and harassment at the workplace.
- 2.2. Equal opportunity is for everyone, but it mainly concerns members of underrepresented categories who are the ones traditionally disadvantaged at the workplace. Suntrack does not guarantee employment or promotions for people in such categories, but undertakes to treat them fairly by providing them with equal opportunities.
- 2.3. All of our partners, vendors, contractors, suppliers, associates and affiliates are encouraged to adopt similar EEO policies in their organization.



3. Policy elements

- 3.1. Being an equal opportunity employer means that we provide the same opportunities for hiring, rate for the job/experience, pay grades and rates, training and development, promotions and other terms of employment to everyone without discrimination due to characteristics such as:
 - a) Race and ethnicity
 - b) Skin colour
 - c) Religion
 - d) Sex / gender
 - e) Sexual orientation
 - f) Disability
 - g) Age
 - h) Marital status

- 3.2. The EEO Policy is formulated around preventive and affirmative actions to ensure fairness in all aspects of employment. These aspects include:
 - a) Hiring
 - b) Pay rates for job and experience
 - c) Training and development
 - d) Promotions
 - e) Appraisal
 - f) Compensation and benefits
 - g) Termination

- 3.3. Equivalent to the above, the nature of operations in Suntrack requires hiring/promotions/assignments to be based on **inherent job requirements** that are the essential criteria of the job and are the core **duties** that must be carried out in order to fulfill the purpose of the **position**.

- 3.4. The inherent requirements of a job will vary depending on what the job entails. They may include:
 - 3.4.1. the ability to perform tasks which are essential to perform a job productively and to the required quality.

 - 3.4.2. the ability to work effectively in a team or other organization.

 - 3.4.3. the ability to work safely.

- 3.5. Notwithstanding the foregoing, Suntrack's retirement policy pursuant to the Minimum Retirement Age Act 2012, and the safety and health guidelines suitable for a construction site shall take precedence over the EEO Policy.



- 3.6. Suntrack further abhors the utterance of words or statements of racial nature or a degrading nature in respect of race, religion or culture or the use of intemperate language and utterance against any individual or group, foreign or local touching on race, ethnicity, gender, creed, religion, age, disability or sexual preference especially when dealing with employees, customers and/or suppliers.
- 3.7. The Human Resource Department (HR) will be responsible for assessing the company's processes and ensuring that they are free from bias and discrimination. HR shall continue to refine company processes, train employees to combat any bias and protect possible victims of discrimination. This will ensure employees are given the chance to work in an environment where everyone's rights are protected and respected.

4. Employee responsibilities

- 4.1. As an employee of Suntrack, all employees shall read, understand and comply with the information contained within this Policy.
- 4.2. All Heads of Departments, Managers and supervisors are responsible for using equal opportunity practices and make decisions based on objective, non-discriminatory criteria.
- 4.3. An employee of Suntrack shall not orally, in writing or in any other form including but not limited to social media make any discriminatory or disparaging comments, insinuations, posts or remarks on another employee, suppliers, contractors, stakeholders, partners, associates, affiliates, and guests of Suntrack in relation to characteristics stated in Clause 3.1 herein.

5. Harassment

- 5.1. Suntrack does not tolerate any act of discrimination or harassment or the use of intemperate language and utterances against any individuals or groups, foreign or locals related to race, ethnicity, gender, creed, religion, age, disability or sexual preference especially when dealing with employees, customers and/or suppliers and any employee found to have committed such conducts will be subject to strict disciplinary action, including possible termination of employment.
- 5.2. Harassment, which includes sexual or non-sexual harassment such as discrimination or use of intemperate language and utterances is deemed an inappropriate conduct which is unwelcomed and personally offensive to its recipient which has the purpose or effect of:
 - 5.2.1. Creating an intimidating, hostile, or offensive work environment; or
 - 5.2.2. Unreasonably interfering with an individual's work performance.

- 5.3. Further to the above, sexual harassment is defined as any unwanted conduct of a sexual nature that takes the form of verbal, non-verbal, visual, psychological or physical treatment:
 - 5.3.1. that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his/her employment; or
 - 5.3.2. that might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to his/her well-being, but has no direct link to his/her employment.
- 5.4. This includes e-mail or letters illustrating sexual content or harassment that is unsolicited.
- 5.5. Any employee who has been directly harassed, or has witnessed or is affected by the harassment of others, should take appropriate steps specified herein:
 - 5.5.1. Immediately object verbally and make clear to the harasser that their behavior is contrary to this Policy and that harasser should immediately stop behaving in such a manner.
 - 5.5.2. Follow up with a written objection to the harassment to the harasser.
 - 5.5.3. Keep a written record of each incident of sexual harassment, including the date, time and place, any evidence and available witnesses.
 - 5.5.4. Talk to someone immediately after the incident and seek advice. Notify any potential witnesses that they may need to participate in a Domestic Inquiry ("DI"), if need be.
 - 5.5.5. Make a formal complaint to the employee's direct superior, Head of Department or directly to the Human Resource Department within 72 hours of the incident. Formal complaints made to the employee's direct supervisor or Head of Department must be referred to the Human Resource Department at the earliest opportunity, and in any event within twenty-four (24) hours of the complaints being made.
- 5.6. Complaints about other matters should be made using the procedures prescribed under Clause 4.3 of the Human Resource Policies and Procedures Manual.



6. Grievance and disciplinary procedure

- 6.1. Employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of the Human Resource Department. Employees can raise legitimate concerns and make good-faith reports without fear of reprisal. It may be reported under the "Whistleblower" option or through established grievance procedures. All reports will be treated as confidential, and Suntrack will ensure that anyone who makes such reports will not be in detriment as a result of raising genuine concerns about discrimination, even if they turn out to be mistaken.
- 6.2. Anyone reported to have acted in breach of the EEO Policy will be thoroughly investigated.
- 6.3. Any type of retaliatory behavior, or threats of retaliation made against the victim of discrimination who has reported it, or against someone who was aware of the reported discrimination, will result in immediate disciplinary action which includes dismissal from employment.

7. Monitoring, Reviewing and Enforcement

- 7.1. Suntrack will diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the company, and if necessary, implement changes where necessary.
- 7.2. This Policy form part of Suntrack's contract of employment and the company may amend it at any time so as to improve its effectiveness at combatting discriminatory practices.