



FRASER & NEAVE HOLDINGS BHD

(Group No. 4205-V)



HUMAN RIGHTS POLICY

VERSION 1
April 2022

Principles & Rationales

Fraser & Neave Holdings Bhd and its subsidiaries (“**F&NHB**”) operate their business with integrity, honesty, fairness and full compliance with all applicable laws. F&NHB adheres to the principles and provisions of the Code of Corporate Governance 2018 as well as to F&NHB’s “[Code of Business Ethics & Conduct](#)”. We are committed to taking responsibility for our impact on society and treating all of our stakeholders with dignity, respect, fairness without discrimination, and consideration for their human rights. Our stakeholders include employees, business partners, suppliers and communities throughout our value chain. We believe that to enhance our business sustainably and to contribute positively to the society, it is crucial to respect the human rights and the relevant principles of all stakeholders in our value chain.

To promote and respect the rights of all stakeholder groups, we established F&NHB’s Human Rights Policy that upholds under domestic and international laws, rules, and regulations. The Human Rights Policy was developed to align with the related human rights principles under the international standards, including the United Nations Universal Declaration of Human Rights, as well as the United Nations Guiding Principles on Business and Human Rights (“**UNGP**”), United Nations Global Compact, and the International Bill of Human Rights and The International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

Definitions

The Company	Refers to F&NHB, and subsidiaries where the Company holds more than 50% of their shares and has management control.
Employees	Refers to all employees who work under an employment contract with the Company, covering all positions.
Suppliers	Refers to contractors, sub-contractors, manufacturers, primary producers, importers/ merchants, and professional service providers.
Business Partners	Refers to agents, joint venture partners and customers.

Scope of the Policy

F&NHB's Human Rights Policy applies to all activities (i.e. direct activities, products, or services), as well as to all of F&NHB's directors, executive officers, employees, and all business operations and associated activities. The Company's suppliers and business partners are expected and strongly encouraged to support and align with our Human Rights Policy and commitments, where applicable.

Moreover, we extend these expectations and commitments throughout the Company's value chain, to all relevant stakeholders and affected rights holders, including:

- customers
- local communities
- the Company's indirect employees (i.e. third-party contracted labour)
- vulnerable groups (i.e. women, pregnant women, children, indigenous people, foreign/ migrant workers, local communities, minority groups, refugees, stateless individuals, disabled people, elderly, and LGBTQI+ identifying individuals).

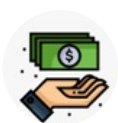
F&NHB's human rights commitments include:



Prohibition of child labour, forced labour, human trafficking, and discrimination and harassment.



Respecting and promoting fairness, diversity, the right to freedom of association and collective bargaining, and fair remuneration.



Respecting and promoting fair working conditions, addressing the elimination of excessive working hours and supporting the right to a minimum or living wage, where required by the country's regulation.



Respecting and promoting health and safety, data privacy and the environment of our stakeholders.

We expect all our stakeholders to be aware and align with these human rights commitments, where applicable.

Practices & Guidelines of the Policy

To meet our human rights commitment, F&NHB effectively oversees our human rights management, and performance through the Company’s Human Rights Due Diligence (“**HRDD**”), which is in-line with UNGP’s human rights framework.

As part of the HRDD, we conduct a Human Rights Risk Assessment (“**HRRA**”) for all own operations and its associated activities in our value chain. The scope of the HRRA aligns with the scope of F&NHB’s Human Rights Policy. The risk assessment covers all previously mentioned stakeholders, rights holders, and vulnerable groups at risk of human rights violations, as well as, the human rights issues outlined in our commitments.

Moving forward, we aim to progressively incorporate this to all of our existing operations.



**EMPLOYEE
PRACTICES**



**SUPPLIER
PRACTICES**



**BUSINESS PARTNER
PRACTICES**



**COMMUNITY &
ENVIRONMENTAL
PRACTICES**

Employee Practices



Our human rights commitments have been incorporated into all aspects of our Human Capital management. We ensure respect of human rights for all of our employees through incorporation of human rights aspects into our Code of Business Conduct. This includes respect for human dignity, human rights for every person, and zero tolerance for discrimination, whether due to differences in ethnicity, race, nationality, gender, language, age, skin colour, physical status, religion, political view, education, social status, culture, tradition, union membership, gender identity or any other status which is considered to be a human right.

F&NHB is committed to ensuring that all workers are treated fairly in hiring and other working practices, such as job applications, promotions, job assignments, training, wages, benefits, and termination. We are also committed to fostering, cultivating, and preserving the culture of diversity and inclusion across the businesses and in all working levels. We aim to attract and retain talent from all backgrounds.

F&NHB is committed to fair remuneration for all employees and to the right to freedom of association and collective bargaining. The Company is compliant with local laws and when applicable, meeting international standards, including the prohibition of child and forced labour, and other illegal forms of labour.

F&NHB sets high standards for safety, occupational health, and the working environment. The Company ensures effective health & safety policies are up-to-date and effective in order to prevent accidents, injuries, and work-related illnesses arising from business activities in accordance with the standards imposed by applicable laws and international standards.

F&NHB has established easily accessible reporting channels (as stated in the Whistleblowing Policy and Grievance Policy) for employees to report and feedback on issues. They are encouraged to report any form of human rights violations arising from the Company's business operations through those reporting channels. As specified in the [F&NHB's Whistleblowing Policy](#), we shall protect, support and treat any whistle-blower fairly.

F&NHB will establish awareness building and training to employees to understand their roles, duties, and responsibilities related to human rights and to perform their duties in accordance with our human rights commitments and guidelines.

Supplier Practices



F&NHB commits to fair treatment for all suppliers without discrimination. We communicate and support suppliers and business partners to do business with ethics, respect for human rights of others and treating others fairly.

We expect and encourages all suppliers to conduct their business in accordance with our commitments on human rights, including promoting the right to freedom of association and collective bargaining, addressing the elimination of excessive working hours and supporting the right to a minimum or living wage, where required by the country's regulation, and animal welfare, and to adhere to the principles of fair and business ethics, as well as applicable laws and regulations. Child and forced labour, and other illegal forms of labour are strictly prohibited.

Our Sustainable Procurement Policy and sourcing practices cover our full commitment to standard principles of ethical business practices throughout the supply chain, and to adhere to guidelines and principles of fair play and transparency. Our sourcing practices take into consideration environmental, social, governance, and economic factors in our suppliers' selections. We also focus on local sourcing to contribute to local economic development when applicable.

Our [Supplier Code of Practice](#) outlines our commitments and expectations for suppliers relating to business ethics, environmental management, health and safety, and human rights. We encourage and support our suppliers to have appropriate measures in place for preventing, mitigating, managing, and remedying the human rights violations potentially arising from their business operations. Any forms of human rights violations found shall be addressed and will not be ignored by the Company.

Business Partner Practices



F&NHB commits to fair treatment for all business partners without discrimination. We expect our business partners to align with our Human Rights Policy, and any relevant human rights laws, practices, and standards, where applicable.

We also encourage our business partners to apply our human rights commitments in their management approaches. We ensure that our customers receive products and services that are of good quality, safe, fair and equitable pricing and promote health and nutrition.

Community & Environmental Practices



F&NHB commits to ensuring that our operations and business activities produce no direct human rights violations for surrounding communities and the environment.

We operate our businesses responsibly through giving considerations towards potential impacts on communities and the surrounding environment. The Company has established an Environmental Policy as well as management guidelines for conducting business activities and minimising environmental impacts as much as applicable. We aim to strengthen positive relationships with all stakeholders, and for fair and transparent treatment of stakeholders to prevent any violations of their human rights.

F&NHB continuously tracks, monitors, and assesses our human rights risks, and have developed whistleblowing and complaint/feedback channels where inputs on issues and concerns related to human rights violations can be submitted. We will communicate and educate employees on our human rights practices. We promote and support cooperation from all directors, executives, employees, and all groups of stakeholders within the business value chain in reporting on any forms of human rights suspicions, incidents, and violations arising from the business operations through the Company's established and dedicated channels.

The results from these channels will be used to consider any improvements, and to develop appropriate mitigation and remediation measures. We evaluate the implementation on human rights policies and mitigation measures, according to the tracking and monitoring processes. A person who has committed a violation of human rights will be subjected to the disciplinary action process, and punished according to the Conduct and Discipline section in the F&NHB's Human Capital Handbook. If such violation is against the applicable laws, legal proceedings may also be initiated.

We are determined to conduct the HRDD process regularly to identify/ review and evaluate any risks and impacts relating to a violation of human rights caused by the Company's business operations and associated activities. Our Human Rights Performances will be reported annually in our Sustainability Report.



This Human Rights Policy Statement consolidates the existing human rights commitments reflected in our existing corporate commitments, control and procedures, processes, and management approaches.