

HUMAN RIGHTS POLICY

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1. INTRODUCTION

- 1.1 This Human Rights Policy ("**Policy**"), in conjunction with various Group-wide policies, reflects our commitment and sets out our principles to protect human rights within ESR Group Limited and its subsidiaries (collectively, "**ESR**" or the "**Group**")'s sphere of influence by adopting responsible workplace and employment practices, and conducting business operations in a manner that preserves the dignity and respect of all people with whom the Group engages.
- 1.2 Our commitment to human rights is supported by ESR's Diversity, Equity and Inclusion Policy, which sets the tone in relation to the Group's stance and position against discrimination or harassment based on race, colour, religion, sex, age, disability, or national origin. The rules of conduct apply to all employees of ESR and its subsidiary companies.
- 1.3 This Policy is intended to complement all human rights laws and regulations, as well as relevant local statutory requirements, which shall be complied with by the Group and its related entities.
- 1.4 This Policy is to be read in conjunction with the Code of Conduct and Business Ethics, Diversity, Equity and Inclusion Policy, Group Human Resources Policy, ESR Employee Handbook and the relevant company policies and operating practices of local ESR offices.
- 1.5 Our approach towards human rights extends to the management of our supply chain. ESR's Supplier Code of Conduct sets out our expectations of suppliers with regards to human rights matters.
- 1.6 We respect the values and cultures of the people and the communities in which we operate. Within our capabilities, we reinforce our commitment to respecting human rights through the improvement of social and environmental conditions. We aim to serve as a positive influence in communities and demonstrate by our actions and belief that human rights violations are unacceptable.

2. PRINCIPLES OF HUMAN RIGHTS

- 2.1 ESR upholds and respects the principles set out in the International Labour Organisation ("**ILO**")'s Declaration on Fundamental Principles and Rights at Work. We respect these five fundamental

rights in our operations covering:

- (a) Freedom of association and the right of collective bargaining;
- (b) Abolition of all forms of forced or compulsory labour;
- (c) Effective abolition of child labour;
- (d) Elimination of discrimination in respect of employment and occupation;
- (e) Providing a safe and healthy working environment.

3. MODERN SLAVERY

- 3.1 ESR takes a zero-tolerance approach towards modern slavery practices within our operations and is committed to taking appropriate action to respond to the humanitarian impacts of modern slavery. The Group supports the intent of international conventions, treaties, and protocols relevant to combating modern slavery and the Modern Slavery Act 2018.
- 3.2 Modern slavery is defined where coercion, threats, or deception are used to exploit individuals and undermine or deprive them of their freedom.
- 3.3 The following eight types of serious exploitation, as defined by the Modern Slavery Act 2018, are prohibited by ESR:
- (a) Human trafficking, which is the recruitment, harbouring and movement of a person for the purposes of exploitation. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude, or the removal of organs.
 - (b) Slavery, which is where the offender exercises powers of ownership over the victim.
 - (c) Servitude, which is where the victim's personal freedom is significantly limited, and they are not free to stop working or leave their place of work.
 - (d) Forced labour, which is where the victim is either not free to stop working or not free to leave their place of work.
 - (e) Forced marriage, which is where coercion, threats, or deception are used to make a victim

marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

- (f) Debt bondage, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
- (g) Illegal child labour, which involves situations where children are exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs.
- (h) Deceptive recruiting for labour or services, which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

4. HEALTH, SAFETY AND WELL-BEING

4.1 The Group is committed to ensuring that our employees are safe, with no threat from injury or risk to health while at work, as part of basic human rights. The Group recognises that a safe and healthy work environment is fundamental to good business management and employee relations.

4.2 The Group is committed to:

- (a) Complying with all prevailing laws and regulations, codes of practice, and safe operating procedures;
- (b) Establishing, maintaining, and reviewing measurable objectives and targets to strive for continual improvement in health & safety performance;
- (c) Ensuring all hazards / risks to health & safety are identified, assessed, and effectively controlled according to work activities and the level of risk;
- (d) Monitoring and reviewing the effectiveness of measures to control hazards / risks to health & safety;
- (e) Providing all employees with information, instruction, training, and supervision to safely carry

out their responsibilities; and

- (f) Ensuring that all workplace incidents and injuries are accurately reported and recorded.

5. IMPLEMENTATION AND ENFORCEMENT

- 5.1 Employees may raise any matter of concern relating to any violation of human rights. The Group will review and seek to resolve the complaint in an objective, fair and prompt manner.
- 5.2 We expect employees to maintain the highest standards in conformity with these principles. Disciplinary measures shall be enforced against any Group employee who is in breach of these human rights principles.
- 5.3 If employees have concerns about any instance of malpractice, human rights abuses, or discrimination, they have a responsibility to raise them through their reporting manager. Please refer to Section 25 of the Group Human Resources Policy on details on grievance handling procedures. In addition, ESR's Whistleblowing Policy has centralised procedures and reporting channels which employees and other persons may, in confidence, raise concerns on human rights issues.

