

Anti-Sexual Harassment Policy

THIS POLICY APPLIES TO:

- MST Golf Group Berhad
(Registration No.: 199301009307 (264044-M))
- MST Golf Sdn Bhd
(Registration No.: 198901011987 (189294-P))
- MST Golf Management Sdn Bhd
(Registration No.: 200101013452 (549209-A))
- MST Golf Arena Sdn Bhd
(Registration No.: 199801015399 (471528-D))
- MST Golf (Singapore) Pte Ltd
(Registration No.: 200002124N)

Anti-Sexual Harassment Policy

ADOPTION & REVISION HISTORY:

Rev.	Effective Date	Description	Approved by
0	1 Feb 2023	Formal Adoption	Executive Directors

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1. OBJECTIVE

- 1.1. This Anti-Sexual Harassment Policy ("Policy") aims to provide and promote a work environment that is free of sexual harassment in accordance with the relevant laws against sexual harassment ("Relevant Laws"), including but not limited to Malaysia's Anti-Sexual Harassment Act 2021 ("Act") and Singapore's Protection from Harassment Act 2014.

2. SCOPE

- 2.1. This Policy applies to:
- (a) Directors and employees ("Directors and "Employees" respectively) of all levels in MST Golf Group Berhad ("Company") and its subsidiaries listed in the first page of this Policy (collectively including the Company, "Group") when dealing with each other or with parties defined in (b) and (c) below;
 - (b) Any parties other than Directors and Employees, who have been appointed to represent the Group ("Agents"), when dealing with Directors and Employees, each other or parties defined in (c) below;
 - (c) The Group's clients, consultants, contractors, vendors, or any other parties that the Group may encounter in its business operations (collectively, "External Parties"), when dealing with Directors, Employees or Agents.

3. DEFINITION OF SEXUAL HARASSMENT

- 3.1. This Policy uses the same definition of sexual harassment as the Act, where "sexual harassment" means any unwanted conduct of a sexual nature, in any form, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is reasonably offensive or humiliating or is a threat to his/her well-being.

4. POLICY STATEMENTS

- 4.1. All Directors, Employees and Agents have the right to work in an environment free of sexual harassment.
- 4.2. The Group prohibits any form of sexual harassment that may take place arising out of and in the course of the Group's business operations, including but not limited to the following:
- 4.2.1. **Verbal harassment** i.e. sexual or sexually suggestive remarks, comments, jokes, jests, sounds, questions, suggestions, and invitations about a person's body, clothing, sex, gender, sexual activities, etc.

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- 4.2.2. **Gestural harassment** i.e. sexually offensive or lewd acts or gestures such as looking a person up and down, ogling, following or stalking someone, holding or using objects in a sexually suggestive manner, making sexual gestures with the hand(s) or through body movements, using facial expressions such as winking, throwing kisses, licking lips, etc.
 - 4.2.3. **Visual harassment** i.e. showing pornographies, showing or drawing sexual images, writing or sending letters, notes, emails or text messages that contain sexual remarks, comments, jokes, questions, suggestions, and invitations about a person's body, sex, gender, and/or sexual activities, etc.
 - 4.2.4. **Psychological harassment** i.e. repeated unwanted social intervention, persistent flirting, relentless proposals for dates, promised gifts / promotion / good assessment in return for sexual favour or physical intimacy, etc.
 - 4.2.5. **Physical harassment** i.e. inappropriate touching, patting, pinching, stroking, brushing up against the body, hugging, kissing, fondling, standing or sitting too close, etc.
- 4.3. For the avoidance of doubt, this Policy shall be considered breached if any form of sexual harassment had taken place arising out of and in the course of the Group's business operations regardless of:
- 4.3.1. The time and place it had taken place;
 - 4.3.2. Whether the offender is a Director, Employee, Agent or someone from External Parties dealing with an Employee or Agent.
 - 4.3.3. Sex and gender of the victim and offender (i.e. a victim can be of any sex and gender, and can lodge a report against an offender of any sex and gender).
 - 4.3.4. Organisational positions of the victim and offender (e.g. an Employee can lodge a report against his/her superior and vice versa).

5. DIRECTORS' AND EMPLOYEES' DUTIES AND RESPONSIBILITIES

- 5.1. All Directors and Employees are required to:
- 5.1.1. Read, understand and commit to fully comply with this Policy;
 - 5.1.2. Carry out his/her job duties in such manners that are in compliance with this Policy; and
 - 5.1.3. Report any event or suspected event of sexual harassment through the channels stipulated in the "Reporting Channels and Procedure" section of this Policy.

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6. REPORTING CHANNELS AND PROCEDURE

- 6.1. No parties shall assume that the Group or any personnel of the Group is aware of any occurrence of sexual harassment. Individuals who believe they have been sexually harassed, or become aware of an occurrence of sexual harassment involving parties covered under this Policy, should immediately report the occurrence to one or more of the following:
 - 6.1.1. The Group's human resource department ("HR Dept")
 - 6.1.2. The Group's whistleblowing channel as stipulated in the Group's whistleblowing policy; and/or
 - 6.1.3. The grievances channel as stipulated in the Group's employee handbook.
- 6.2. No retaliation will be taken against individuals submitting reports of sexual harassment ("Complainants") so long as such reports were made in good faith.
- 6.3. Upon receipt of reports of sexual harassment, the HR Dept will assess the circumstances of the report to determine:
 - 6.3.1. If it is made in good faith, not frivolous, and not vexatious; and
 - 6.3.2. The appropriate next course of action depending on whether the purported offender is a Director or Employee.
- 6.4. If the report warrants further inquiry, and the purported offender is a Director or Employee, a formal inquiry will be initiated in accordance with the Group's disciplinary and domestic inquiry procedure.
- 6.5. If the report warrants further inquiry, and the purported offender is an Agent or External Party, the Group shall investigate within the provisions of its contracts or agreements with the purported offender to ascertain if there is a breach, and encourage the victim to report the matter to an appropriate law enforcement authority.
- 6.6. If the report is found to be not made in good faith, frivolous, and/or vexatious, the HR Dept shall within 30 days from the receipt of the report inform the Complainant in writing that there will be no further inquiry, giving reasons to justify the assessment.
- 6.7. The Group recognises the importance of handling sexual harassment allegations with caution and in a fair and professional manner. As such, it is pertinent that reports of sexual harassment and any subsequent show cause letters should be as specific as possible and include crucial information such as date, time, place and circumstances surrounding the alleged offence. Such information will not only facilitate investigation and inquiries, but will also minimise room for speculation and provide a fair chance for the purported offender to respond in his/her defence.

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- 6.8. Upon completion of inquiry, if a Director or Employee is found to have committed sexual harassment, he/she will be subject to disciplinary actions as stipulated in the Group's employee handbook and/or in accordance with the provisions of his/her appointment letter, which may be one or any combination of the following:
- a) Dismissal without notice or any salary in lieu.
 - b) Suspension for not more than 2 weeks without pay.
 - c) Downgrading/demotion
 - d) Receiving a warning letter.
 - e) Imposition of any other lesser punishment as deemed fit by the Company.

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