

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)
- PT MST Golf Distribution (AHU-0068036.AH.01.01.TAHUN 2023)
- PT MST Golf Indonesia (AHU-0067107.AH.01.01.TAHUN 2023)

Child Labour & Forced Labour Policy

ADOPTION & REVISION HISTORY:

Rev.	Effective Date	Description	Approved by
0	1 Feb 2023	Formal Adoption	Executive Directors
1	15 Aug 2024	<ul style="list-style-type: none">Added Indonesian subsidiaries into the Group.Added detailed definitions of child labour and forced labour.Added "Risk Assessment" as a strategy.Added more details on how to ensure voluntary employment.	Executive Directors

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Child Labour & Forced Labour Policy

1. OBJECTIVE

- 1.1. This Child Labour and Forced Labour Policy ("Policy") aims to eliminate and prevent the use of child labour and forced labour within MST Golf Group Berhad ("Company") and its subsidiaries as listed on the first page of this document (collectively including the Company, "Group") as well as its supply chain in line with the relevant laws and regulations (and their latest amendments) governing children and young persons' employment as well as forced labour ("Relevant Laws"), such as the Children and Young Persons Employment Act 1966 Malaysia, Employment Act 1955 Malaysia, and the equivalent of such laws in countries where the Group operates.

2. DEFINITIONS OF CHILD LABOUR AND FORCED LABOUR

- 2.1. Child labour is work that deprives children of their childhood, potential, dignity and is harmful to them physically, mentally, socially, or morally; including interfering with their education. Children engaged in labour are often exposed to hazardous conditions, deprived of education, and vulnerable to physical and emotional abuse. Abolishment of child labour is a key principle and objective of major human rights legislations and is a national legislation in most countries.
- 2.2. Hazardous work is defined as work that, due to its nature or the circumstances in which it is carried out, is likely to jeopardise children's health, safety, or morals.
- 2.3. Child labour may be identified by various components including, but not limited to, the following:
- 2.3.1. age limit,
 - 2.3.2. employment type,
 - 2.3.3. hazardous work,
 - 2.3.4. number of days of work, and
 - 2.3.5. hours of work.
- 2.4. Forced or compulsory labour exists globally in a variety of forms. The most extreme examples are slave labour and bonded labour. It refers to situations where individuals are compelled to work against their will under the threat of punishment or other forms of coercion. This may include physical or psychological abuse, deception, or manipulation in various forms such as debt bondage, human trafficking, and other conditions where individuals are exploited and lack the freedom to leave their work. However, there are a few exceptions to forced labour such as work or service that is part of military service, normal civic accountability, and consequence of court conviction.

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2.5. Forced labour could be identified using various indicators including, but not limited to, the following:

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| 2.5.1. Abuse of vulnerability | 2.5.7. retention of identity documents |
| 2.5.2. Deception | 2.5.8. Withholding of wages |
| 2.5.3. Restriction of movement | 2.5.9. Debt bondage |
| 2.5.4. Isolation | 2.5.10. Abusive working and living conditions |
| 2.5.5. Physical and sexual violence | 2.5.11. Excessive overtime |
| 2.5.6. Intimidation and threats | |

3. STRATEGIES

3.1. The following are strategies undertaken by the Group to achieve the abovementioned purpose.

- 3.1.1. Ensuring voluntary employment.
- 3.1.2. Set minimum age of employment.
- 3.1.3. Hold concise and verified records of employees.
- 3.1.4. Provide employees with channels to voice out any contravention to this Policy.
- 3.1.5. Procedures to ensure suppliers and contractors adhere to this Policy.
- 3.1.6. Take actions against parties that violate this Policy.
- 3.1.7. Conduct risk assessments to identify and mitigate risks associated with child labour and forced labour.

4. ENSURING VOLUNTARY EMPLOYMENT

- 4.1. The Group ensures that all of its employees work voluntarily for the Group and are not intimidated or threatened to force employment. They also retain their rights and privileges at all times from recruitment stage until termination of employment.
- 4.2. In its employment practices, the Group absolutely refrains from practicing abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions and excessive overtime.

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- 4.3. The Group ensures that every employee is employed under a fair and transparent employment contract that is in accordance with employment laws and acts and includes all the agreed and essential information regarding their conditions of employment.
- 4.4. The Group also complies with the minimum wage legal requirements.

5. SET MINIMUM AGE OF EMPLOYMENT

- 5.1. The Group does not employ any person under the definition of “child” and “young person” in the Relevant Laws, unless there is specific benefit to the “child” or “young person”, in which case the Group ensures that:
 - 5.1.1. Relevant Laws requirements are upheld;
 - 5.1.2. The “child” or “young person” continues to have access to further education to develop his/her qualification and skills;
 - 5.1.3. The “child” or “young person” will not work in any hazardous environment, beyond the legally acceptable weekly hours, hours of the day and days of the week (in accordance with the Relevant Laws).

6. HOLD CONCISE AND VERIFIED RECORDS OF EMPLOYEES

- 6.1. The Group holds concise and verified records of its employees. It is a pre-requisite for all prospect employees to provide the Group with official and certified-true copies of documented evidence of date of birth, such as identity cards and /or passports, as part of the job application process.

7. PROVIDE EMPLOYEES WITH CHANNELS TO VOICE OUT ANY CONTRAVENTION TO THIS POLICY

- 7.1. The Group provides the following channels to its employees to voice out any contravention to this Policy:
 - 7.1.1. Employee grievances channel as set out in the Group’s employee handbook.
 - 7.1.2. Whistleblowing channel as set out in the Group’s whistleblowing policy.
 - 7.1.3. Annual performance appraisal where employees can put into record any contravention to this Policy.

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8. PROCEDURES TO ENSURE SUPPLIERS AND CONTRACTORS ADHERE TO THIS POLICY

- 8.1. The Group puts in place the following procedures to ensure its suppliers and contractors adhere to this Policy:
- 8.1.1. The Group screens potential suppliers and contractors to select only legally established suppliers and contractors.
 - 8.1.2. Where suppliers' or contractors' works are being carried out in the Group's premises, the Group requires the suppliers and contractors to submit the particulars of their workers, including their identification documents and where relevant, work permits.
 - 8.1.3. The Group requires its suppliers and contractors to sign declaration of compliance to this Policy.

9. ACTIONS AGAINST PARTIES VIOLATING THIS POLICY

- 9.1. Parties found to have violated this Policy will be subject to one or more of the following actions:
- 9.1.1. Employees, particularly those in-charge of recruitment or labour sourcing, who fail to follow the procedures set out in this Policy and other recruitment procedures, will be subject to disciplinary actions such as issuance of warning letters, suspension, demotion, and termination of employment.
 - 9.1.2. Employees who have been employed by the Group under false information will be terminated immediately if found to be underage.
 - 9.1.3. Suppliers and contractors who are found to have employed child labour and/or forced labour will be terminated within the terms and conditions of their contracts or agreements, unless they take immediate actions to comply with the Policy.

10. RISK ASSESSMENT

- 10.1. As part of the Group's enterprise risk management framework, the Group assesses risks associated with child labour and forced labour and implement mitigation actions that prevent such risks (including those specified in this Policy).

11. MONITORING AND REVIEWS

- 11.1. The effectiveness of this Policy is reviewed by internal control audits and the sustainability data collection as well as reporting as part of the Company's obligations as a public listed company under the Bursa Malaysia Securities Berhad.

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