


TOP GLOVE CORPORATION BHD

 Effective Date 1.9.2015	HUMAN RESOURCE MANUAL	Revision No. 2
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Top Glove reserves the right to modify, revise, cancel or waive any policy, procedure or condition without notice and without revision.

SOP AMENDMENT RECORD

Amendment No.	Date	Type of Change
1	3/12/2019	i) Overall content review ii) added clause 4.10. iii) Updated Appendix. iv) Revised clause 4.2
2	24/7/2020	i) Updated Appendix ii) Revised clause 4.5.1 iii) Updated clause 4.10.2

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1. OBJECTIVE

The objective of this policy is to ensure that the Company and all its employees adhere to Social Compliance Initiatives in line with the legal regulations and requirements.

2. SCOPE

This policy covers all employees of the Company which consist of Top Glove Corporation Berhad and all its subsidiaries [TG or the Company].

3. APPENDIX

3.1 Posters for BSCI Code of Conduct & ETI Base Code

3.2 TG Occupational Safety and Health Policy

3.3 TG Environmental Policy

3.4 TG Anti Bribery & Anti Corruption Policy

4. POLICY

4.1 Freely Chosen Employment & No Forced Labour

4.1.1 No forced (working under threat of penalty), bonded or indentured (forced to work to pay off debt) labor.

4.1.2 Involuntary prison labor; slavery or trafficking of persons shall not be used.


4.1.3 Employer do not hold the employee's original documents. Please refer HR Manual - Foreign Workers' Passport Safekeeping.

4.1.4 Employment Contract shall be provided in the language understandable by the employee before engaging into employment.

4.1.5 The Employment Contract shall consist of description of their duties, information on working hours, rate of pay and other benefits.

4.1.6 In case the employee is illiterate, an experienced employee shall translate the content of the Employment Contract prior to obtaining the consent to engage into employment.

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4.1.7 Either employer or employee may at any time give notice to the other party to express the intention to terminate such contract of service.

4.1.8 The length of such notice shall be the same for both employer and employee and shall be determined by the provision made in the Employment Contract.

4.1.9 Employment contract can be terminated immediately with compensation *in lieu* of notice.

4.2 No Underage Employees

4.2.1 Each individuals age is verified based on the information provided in his/her personal documents before engaging into employment.

4.2.2 Considering that the company operated in a manufacturing environment, no one under the age of 18 shall be hired as employee.

4.2.3 In the event of accidental hiring of child / young person, he/she shall be removed from site immediately with compensation in lieu of notice

4.2.4 Further investigation will be conducted and disciplinary actions will be taken against departments that are found violating these regulations.

4.3 Minimum Wage and Working Hours


4.3.1 Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

4.3.2 Working hours and overtime shall be limited to what is acceptable by local laws and the information shall be communicated to all employees in written via memos or other channels of communications.

4.3.3 Disciplinary actions will be taken against departments that are found violating these regulations without valid reasons.

4.3.4 Wages shall be paid at regular intervals.

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4.4 Freedom of Association and Rights to Collective Bargaining

- 4.4.1 Employees have the rights to associate or not associate with third-party organizations, join or not join labor unions, seek representation, bargain or not bargain collectively in accordance with local laws.
- 4.4.2 The Company does not discriminate the members of any trade union as they are given equal opportunity as other employees.
- 4.4.3 General Election for Workers' Representative shall be held once in every two-year or based on necessity basis. Candidate with majority votes will be elected to represent the workers of his/her nationality during the meetings with management (if any).
- 4.4.4 The Company allows a worker's representative to access workers in the workplace.
- 4.4.5 The authority shall be revoked if such condition results in any misconduct or negligence in the performance of duties of either party (the worker representative or any of the workers).

4.5 Anti-Discrimination (Humane Treatment)

- 4.5.1 Harassment and unlawful discrimination are not tolerated at any stage of employment; including race, color, religion, national origin, age, disability, disease, sexual orientation, gender identity, marital status (including pregnancy), family responsibilities, social background, and criminal record.
- 4.5.2 Harsh or inhumane treatment is not tolerated; including all types of harassment (sexual/physical/verbal), sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse of employees, nor is there to be the threat of any such treatment.
- 4.5.3 Employees shall strive to maintain healthy, safe and productive work environment by adhering to the highest standard of professional conduct. They should in all respect and at all time, conduct themselves with honesty, propriety and must not in any circumstances, commit any act

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that would bring damage to the Company, its employees, property, reputation or general interest.

4.5.4 Employees are expected to have respect and tolerance for culture and religion and maintain a work environment that is free from discrimination or harassment.

4.5.5 Employees shall avoid any conduct in the workplace that creates, encourages or permits and offensive, intimidating or inappropriate work environment including, but not limited to:

- a. Threats or comments that contain discriminatory or harassment elements.
- b. Unwelcome sexual advances.
- c. Violent behavior or actions.
- d. Misuse or abusive of positions of authority.
- e. Inappropriate dressing in violation of the dress code policy of the Company.

4.6 Integrity

A. Anti-Corruption & Bribery

4.6.1 The Company shall not tolerate any form of corruption and bribery. Please refer to Appendix 3.4 for **TG Anti Bribery & Anti Corruption Policy**.

4.6.2 Employees shall record and report all information accurately and with integrity.


4.6.3 Records shall be managed securely in line with their importance and in compliance with legal, tax, regulatory, accounting and other business retention requirements as required by the laws in the Country and also in accordance with the requirements of the Legal policy.

4.6.4 Employees shall not offer, give, solicit or accept bribes in order to achieve business or personal advantages for themselves or others or engage in any transaction that can be construed as having contravened the anti-corruption laws.

4.6.5 Employees shall be aware of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorized remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or

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discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.

- 4.6.6 Prior to giving or accepting any business amenity or other gifts (in whatever form or value), employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Company with that organization or individual or any business decision arising out of that business relationship.
- 4.6.7 Employees shall declare all gifts received to their respective GHOD or immediate superior and handover such gifts to the Top Glove Integrity Unit.
- 4.6.8 Employees shall not accept any gratuitous entertainment from any of the Company's clients, customers, suppliers, contractors or any part with whom the Company has business dealings without the prior consent of the management.
- 4.6.9 Employees shall be bound by the Gifts, Hospitality & Entertainment procedures set by the company.
- 4.6.10 Employees are not permitted to sell, distribute or act as agent for the sale or distribution of any type of food or merchandise in the office premises whether during or outside office hours.
- 4.6.11 Disciplinary actions will be taken against the employee who is found to have breach the Company policy.
- 4.6.12 The Company will not hesitate to terminate the service and/or take legal actions against irresponsible / unprofessional business partners who are found bribing the Company's employees or instigating them to accept bribe.

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B. Anti-Employee Poaching

- 4.6.13 The Company practice ethical recruitment and invest in a lot of resources and time to train its employees. Please refer HR Manual – Employee Referral Scheme.
- 4.6.14 Employee poaching is an unwholesome practice and the Company demands its business partners to be socially responsible and ethical in their approach and should not engage in poaching talents by enticing the Company’s employees to join them.
- 4.6.15 Business partners who are found poaching the Company’s employees shall be viewed as unethical and unprofessional, which may affect the business relationship.

4.7 Privacy and Information Security

- 4.7.1 The Company shall comply with privacy and information security law and regulatory requirements when collecting, using, processing or storing personal information.
- 4.7.2 No employees are permitted whether during or after termination of their employment with the Company, to discuss or divulge confidential information pertaining to the company’s businesses and its customers’ details directly and indirectly to anybody, especially to competitors.
- 4.7.3 Employees should not discuss whether among themselves or with others, within the workplace or outside the Company’s premises, confidential information regarding the Company, its business partners, its customers or clients, its employees or any other confidential information except in the course of carrying out the Company’s business.
- 4.7.4 Any information pertaining to the Company in any way whatsoever and which is not generally available to the public shall be treated with the utmost confidence. Such information must not be shared or used by any employee whether directly or indirectly to influence an investment decision in connection with the purchase or sale of securities.

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4.7.5 The first obligation of any employee who receives an order or other request seeking the disclosure of confidential information pertaining to the Company is to contact his/her immediate supervisor or HR Manager for guidance.

4.7.6 An employee should inform his/her immediate supervisor if a member of the media approaches him/her for any information, statement or opinion concerning the Company. The immediate Supervisor shall provide guidance to the employee on the appropriate response to the media's request.

4.7.7 An employee shall not make any public statement, including on Social Media, about the policies or decisions of the Company whether orally or in writing or in any form whatsoever nor shall he/she circulate or cause to be circulated any such statement.

4.7.8 Employees are not permitted to publish or distribute in any written or printed form, articles, books, periodicals, leaflets, brochures etc containing information relating to the Company without prior written approval of the Company.

4.7.9 Any employee who has been invited to appear as a guest speaker in a public forum must, if he/she intends to make such appearance, submit the details and/or the topic(s) of his/her proposed speech to his/her immediate supervisor. The immediate supervisor shall in turn submit the same to the management for their consideration. An employee may only make such appearance if prior approval has been obtained.


4.7.10 Disciplinary actions will be taken against the employee who is found to have breach the Company policy.

4.8 Workplace Health and Safety

4.8.1 The Company ensure its Employees are in a safe environment, protected from hazards of the job.

4.8.2 Where necessary, employees are provided safety equipment as appropriate to the work being performed.

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- 4.8.3 The Company provides ready access to clean toilet facilities, potable water and hygienic food preparation, storage and eating facilities for its employees.
- 4.8.4 The dormitories provided are maintained clean and safe with adequate ventilation.
- 4.8.5 Procedures and systems are in place to manage, track and report occupational injury and illness. Emergency response procedures is also in place to address unforeseen situation.
- 4.8.6 **TG Occupational Safety and Health Policy** as provided in Appendix 3.2 shall communicate the Company's commitment statement.
- 4.8.7 For details, please refer safety procedures in **TG Focus: System Guidance 02 OSHA**.

4.9 Environment


- 4.9.1 The Company is committed to continuously preserve the environment.
- 4.9.2 **TG Environmental Policy** as provided in Appendix 3.3 shall communicate the Company's commitment statement.
- 4.9.3 For details, please refer to **GL MA P02: Infrastructure & Work Environment (Building Environment)**.

4.10 Disciplinary Actions

- 4.10.1 Any employee who commits misconduct or a breach of rules established by the Company, shall be subject to disciplinary action.
- 4.10.2 Misconduct in employment can be broadly dealt with under three (3) headings namely:
 - a. Misconduct relating to integrity and duty, such as carelessness, misappropriation, insubordination, breach of confidential Company information, etc;
 - b. Misconduct relating to discipline, such as fighting, fraud, theft, assault, quarrel, gambling, damage to Company property, drug abuse, etc; and
 - c. Misconduct relating to morality, such as committing an indecent act, sexual advancement, pornography, keeping or distributing indecent or pornographic literature at the workplace, etc.
- 4.10.3 A panel appointed at the discretion of the Company shall conduct all inquiries. The inquiry panel shall not include a member(s) whose presence may affect the impartiality of the panel in its conduct of the proceedings and its recommendations.


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- 4.10.4 The proceedings of an inquiry shall be duly recorded by the panel for submission to the Head of Human Resources (HR) or to the appropriate higher authority for decision.
- 4.10.5 The Company may suspend an employee on half pay for a period of not exceeding two (2) weeks pending an inquiry.
- 4.10.6 All disciplinary actions taken by the Company shall comply with the Company's established procedures and current legislation. Where there is any conflict between the two, current legislation shall prevail.
- 4.10.7 Head of Departments may issue written warnings on the advice of the HR department. All written warnings shall be recorded in the employee personal file. In the event where three (3) warning letters have been issued within a period of twelve (12) months, the employee shall be subject to an inquiry to determine further disciplinary action.
- 4.10.8 Depending on the seriousness of the offence committed and after due inquiry, the employee may be subject to any of the following punishments:
- a. Dismissal without notice
 - b. Demotion
 - c. Suspension from work without pay
 - d. Written warning
 - e. Impose any other punishment as the Company deems just and fit
- 4.10.9 The Company reserves the right to dismiss an employee after due inquiry for misconduct.
- 4.10.10 This right is in addition to and does not prejudice its other rights under law.
- 4.10.11 An employee who has been imposed a disciplinary action shall have the right to appeal in writing within thirty (30) days of the announcement of the decision to Managing Director or Chairman.

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Appendix 3.1: Posters for BSCI Code of Conduct & ETI Base Code

amfori BSCI Code of Conduct

Our enterprise agrees to respect the following labour principles set out in the amfori BSCI Code of Conduct.

amfori BSCI Principles

<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">The Rights of Freedom of Association and Collective Bargaining</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise respects the right of workers to form unions or other kinds of workers' associations and to engage in collective bargaining.</p> </div> </div>	<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Ethical business behaviour</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise does not tolerate any acts of corruption, extortion, embezzlement or bribery.</p> </div> </div>
<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Fair remuneration</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise respects the right of workers to receive fair remuneration.</p> </div> </div>	<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">No discrimination</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise provides equal opportunities and does not discriminate against workers.</p> </div> </div>
<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Occupational health and safety</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise ensures a healthy and safe working environment, assessing risk and taking all necessary measures to eliminate or reduce it.</p> </div> </div>	<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Decent working hours</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise observes the law regarding hours of work.</p> </div> </div>
<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Special protection for young workers</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise provides special protection to any workers that are not yet adults.</p> </div> </div>	<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">No child labour</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise does not hire any worker below the legal minimum age.</p> </div> </div>
<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">No bonded labour</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise does not engage in any form of forced servitude, trafficked or non-voluntary labour.</p> </div> </div>	<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Protection of the environment</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise takes the necessary measures to avoid environmental degradation.</p> </div> </div>

amfori BSCI Approach

<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Code Observance</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise is obliged to protect workers' rights as mandated by the law and the amfori BSCI Code.</p> </div> </div>	<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Supply Chain Management and Cascade Effect</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise uses the amfori BSCI Principles to influence other business partners.</p> </div> </div>
<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Workers' Involvement and Protection</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise keeps workers informed about their rights and responsibilities.</p> </div> </div>	<div style="display: flex; align-items: center; margin-bottom: 10px;">  <div style="margin-left: 10px;"> <p><b style="color: #e67e22;">Grievance Mechanism</p> <p style="font-size: x-small; color: #7f7f7f;">Our enterprise provides a system to collect complaints and suggestions from employees.</p> </div> </div>


www.amfori.org



Trade with purpose

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ETI Base Code

The ETI Base Code is an internationally recognised set of labour standards based on ILO conventions. It is used by ETI members and others to drive improvements in working conditions around the world.

www.ethicaltrade.org



Respect for workers worldwide



Employment is freely chosen



Freedom of association and the right to collective bargaining are respected



Working conditions are safe and hygienic



Child labour shall not be used



Living wages are paid



Working hours are not excessive



No discrimination is practised



Regular employment is provided



No harsh or inhumane treatment is allowed

Why commit to the ETI Base Code?

www.ethicaltrade.org



Respect for workers worldwide



Employment is freely chosen

Slavery and bonded labour are totally unacceptable. Almost 21 million people are victims of forced labour.



Freedom of association and the right to collective bargaining are respected

Tens of thousands of workers lose their jobs every year for attempting to form or join a trade union or improve working conditions. Some even lose their lives.



Working conditions are safe and hygienic

An estimated 2.3 million people die every year from work-related accidents and diseases.



Child labour shall not be used

168 million children work to support their families, missing out on education and often damaging their health. This reinforces the cycle of poverty.



Living wages are paid

Roughly half the world's population still lives on two dollars a day. If people can't feed their families on an adult's wage, they may send their children to work.



Working hours are not excessive

Long working hours are the norm for most of the world's workers. This damages people's health and undermines family life.



No discrimination is practised

Women and certain minorities are often confined to the lowest paid jobs with no access to training or promotion.



Regular employment is provided


Most workers can be laid off when it suits the employer. This fuels poverty and insecurity and drives down wages.




No harsh or inhumane treatment is allowed

Few workers have protection against physical, verbal or sexual abuse in the workplace.

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Appendix 3.2: TG Occupational Safety and Health Policy



TOP GLOVE GROUP OF COMPANIES

OCCUPATIONAL SAFETY AND HEALTH POLICY


TOP GLOVE is committed to Safety and Health and shall prevent or eliminate injuries, occupational illness, as well as damage to properties and to protect everyone from foreseeable occupational hazards.

TOP GLOVE will constantly strive for the following:


- 1) To comply with applicable local Safety and Health legislations, regulations and other requirements;
- 2) Top Glove shall manage all Safety and Health risks associated with its activities and provide control measures to eliminate or reduce the risks to a level as low as reasonably practicable (ALARP);
- 3) Ensure that high priority is placed on emergency preparedness and regular testing of systems, so that all incidents are responded to in a timely and effective manner;
- 4) Ensure that employees and contractors are suitably engaged and encouraged to participate actively in safety and health performance;
- 5) All Employees, clients, sub-contractors, supplier and visitors shall understand the importance of safety and health and improve their awareness by the provision of information, training, instruction and supervision;
- 6) Communicating this policy to everyone working under TOP GLOVE that they are made aware of their individual obligations to achieve a desire positive Safety and Health culture;
- 7) Management Safety and Health Committee shall strive to continuously improve standards and culture towards Safety and Health across the whole organisation.

The policy shall be reviewed and revised for its continuing suitability and be disseminated to all relevant parties.

"Safety is Our Responsibility, Continuous Improvement And Innovation Are Our Duties"




Tan Sri Lim Wee Chai
Chairman
Date: 7/1/17



Mr. Lee Kim Moow
Managing Director
Date: 03/11/17

Last updated on: 11/10/2017

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Appendix 3.3: TG Environmental Policy




Environmental Policy

Top Glove and its subsidiaries are wholly committed to produce consistently high quality healthcare products at efficient low cost, while continuously striving to preserve the environment and to ensure good health, safety and security of our employees. The following policy shall be attained in partnership with our employees, suppliers, contractors, customers and other interested parties.

To achieve these, WE SHALL:

- Comply with all relevant regulatory, statutory and applicable requirements both locally and internationally, which are related to environmental aspects.
- Proactively works towards the prevention of environmental pollution by fully complying to Environmental Management System (EMS) under ISO 14001, which promotes continuous improvement in environmental performance, clean manufacturing, green technology and automation.
- Set objectives and performance targets that promote environmental sustainability and avoid climate change, through:
 - Efficient Usage of Raw Materials, Natural Resources and Energy;
 - Dedicated 5Rs (Refuse, Reduce, Repair, Reuse and Recycle) and Upcycling Programs;
 - Proper Waste Management Practices.
- Systematically promote and provide education and training on environmental protection and responsibilities across all levels within our group of companies.
- Sustainably managed, wisely utilized and conserved biodiversity for current and future generations.


This policy shall be reviewed and revised for continuous improvement and sustainability, and will be disseminated to all relevant parties.

Executive Director, Manufacturing  <hr/> Mr. Hue Kon Fah Date: 6 / 8 / 20	Managing Director,  <hr/> Dato' Lee Kim Meow Date: 10 / 8 / 20	Group Chairman,  <hr/> Tan Sri Dr. Lim Wee Chai Date: 12 / 8 / 20
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Prepared by: Theng Mei Qi (Group EHS)
 Last Updated: 12th August 2020


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Appendix 3.4: TG Anti Bribery & Anti Corruption Policy

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ANTI BRIBERY & ANTI CORRUPTION POLICY



Our management, employees and other relevant interested parties are strongly engaged to:

- 1. We believe bribery and corruption is a crime and preventing it is our duty.*
- 2. We adopt a zero tolerance policy towards all forms of bribery and corruption.*
- 3. We are committed to continual improvement of our anti bribery and anti corruption management system.*
- 4. We are obliged to comply with local and foreign bribery and corruption laws.*



Dato Lee KM
Managing Director


Tan Sri Dr. Lim Wee Chai
Executive Chairman

Documented Appendices Rev. 2 (01.04.2018)

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