


# TOP GLOVE CORPORATION BHD


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| <br><b>Effective Date</b><br>18.10.2020 | <b>HUMAN RESOURCE MANUAL</b>              | <b>Revision No.</b><br>1 |
|  | <b>REWARDS &amp; PERFORMANCE</b>          | <b>No of Pages</b><br>7  |
|  | <b>HRM: PREVENTION OF BULLYING POLICY</b> |                          |

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         | Amended by | Reviewed by | Approved by |
|---------------|------------|------------------------|------------|-------------|-------------|
| 1             | 22/10/2020 | Overall policy review. | Molly Moh  | Loh XL      | Loke KM     |

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## 1.0 POLICY STATEMENT & OBJECTIVE

Top Glove (hereinafter referred to as “the Company”) is fully committed to provide work environment free from violence, threats, abuse, humiliation, intimidation, aggression, and particularly bullying behaviour. Social justice demands a fair treatment of all employees and due respect for their dignity. The existence of bully is a denial of a fundamental principal of social justice. We believe that every employee should be treated with utmost respect and dignity and free from any form of humiliation including bullying that can lead to physical or psychological harm to the victim and can be a serious threat to occupational safety and health (OSH) issues in employment. The Policy on Prevention of Bullying (hereinafter referred to as “the Policy”) is developed with the objective to:

- (a) provide a mechanism to prevent, eradicate and manage bullying behaviour;
- (b) educate our employees to recognize the bullying behaviours; and
- (c) ensure adequate procedures are available to deal with the problem and prevent or minimize its occurrence and recurrence.

## 2.0 SCOPE

The scope of the Policy applies to all the Company’s employees, including indirect workers, irrespective of gender, status or positions.

## 3.0 DEFINITIONS & ABBREVIATIONS

### 3.1 DEFINITIONS


3.1.1 ‘Bullying’ means any repeated behaviour through verbal, physical and/ or social behaviour which is intended to and/ or perceived as to hurt, coerce, mistreat, abuse or harm someone vulnerable by someone stronger. It is unwanted and aggressive conduct that includes:

- (a) Threatening, humiliating or intimidating behaviours.
- (b) Work interference/ sabotage that prevents work from getting done.
- (c) Verbal/ emotional/ physical abuse.

3.1.2. ‘Company’ means Top Glove Sdn. Bhd., including any subsidiary company or associate company under the Top Glove Group of companies.

3.1.3. ‘Management’ means the Chairman, Managing Director, Executive Directors, Directors, Managers, Department Heads, including other Executives who are appointed to act on behalf of the Management.

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## 4.0 FORMS OF BULLYING

4.1 Bullying encompasses various conducts of an abusive nature which can manifest itself in many different possible forms including the following:

- 4.1.1 Verbal bullying  
Verbal bullying includes but not limited to, slandering, ridiculing or maligning a person or his or her family; persistent name calling that is hurtful or humiliating, personal insults and use of offensive nicknames or words, abusive and offensive remarks, constant criticism on the person's work or matters unrelated or minimally related to the person's job performance, spreading rumours and gossip regarding individuals.
- 4.1.2 Physical bullying  
Physical bullying includes but not limited to, pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area, unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property).
- 4.1.3 Gesture bullying  
Gesture bullying includes but not limited to, nonverbal gestures that can convey threatening messages, repeatedly accusing someone of errors that cannot be documented, not allowing the person to speak or express himself or herself (i.e., ignoring or interrupting), using obscene or intimidating gestures.
- 4.1.4 Social bullying  
Social bullying includes but not limited to, lying and spreading rumours, negative facial or physical gestures, playing nasty jokes to embarrass and humiliate, mimicking unkindly, encouraging others to social exclude someone and damaging someone's social reputation or social acceptance.
- 4.1.5 Cultural bullying  
Cultural bullying includes but not limited to, aggressive behaviours toward minorities based on racial or ethnic cultural differences, insult and disrespectful to someone's country of origin or culture.
- 4.1.6 Cyber bullying  
Cyber bullying includes but not limited to, abusive or hurtful texts, emails or posts, images or videos, deliberately excluding other online, nasty gossip or rumours and imitating others online.

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## 5.0 PROCEDURE ON COMPLAINT OF BULLYING


5.1 An employee has the absolute right not to be bullied in the workplace and this right is fully supported by the Company. If you are bullied, don't keep quiet, please take immediate action as follows:

- 5.1.1 Tell the other person (if you are comfortable to do so), in a direct and firm manner or in writing that their behaviour and actions are unacceptable and should cease immediately.
- 5.1.2 Keep a record of all incidents including a photo snap/ video recording, if possible, with the person's name, dates, time, place of incident, a description of the incident, name of witnesses (if any).
- 5.1.3 Complain immediately to your Immediate Superior (IS) / Factory Human Resources (FHR), who will discuss the situation with you in the strictest confidence.
- 5.1.4 IS / FHR will then forward the complaint to Head of Group Human Resources (HoGHR) without delay on the same day the complaint is received or if not possible, on the next working day.
- 5.1.5 If the alleged bully is the Immediate Superior, then the employee should immediately report to the Head of Department (HOD) / Head of Factory (HOF).
- 5.1.6 HOD/ HOF will then forward the complaint to Head of Group Human Resources (HoGHR) without delay on the same day the complaint is received or if not possible, on the next working day.
- 5.1.7 Alternatively, if employee may opt for anonymous reporting channel, employee can raise the complaint via email to [TG@whistleblower.com.my](mailto:TG@whistleblower.com.my); in addition, workers can report directly to the Centralised Worker's Helpline at +016-2062998 or third party helpline (i.e. Impactt helpline) which open during the periodic audit exercise for a scheduled period of time.

## 6.0 PROTECTION AGAINST RETALIATION

- 6.1 After a bullying incident is reported, the Company shall strive to protect the identity of the complainant who reported the incident, and ensure confidentiality of all communications. Protection shall be given during and after investigation as and when necessary and appropriate.
- 6.2 Retaliation against employees who have, in good faith, properly reported the allegations of bullying incident or against employees who have cooperated with a duly authorized investigation, is strictly prohibited.
- 6.3 Retaliation is a misconduct and any employee who commits retaliation may be subject to disciplinary actions.

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## 7.0 INVESTIGATION PROCEDURE

7.1 Upon receipt of the official complaint from the complainant, or from IS, HOD or HOF on the complaint of bullying, the Group HR/ FHR acting as Investigation Officer (IO) will investigate into the complaint within **five (5) days** by recording statements in writing from:

- (a) the complainant;
- (b) the alleged bully;
- (c) the witnesses

7.2 Appropriate action will be taken against any party who failed to follow up or take appropriate actions upon receiving the complaint.

7.3 Both the complainant and alleged bully shall be given equal opportunity to tell their sides of the story and to substantiate with their own witness / witnesses.

7.4 In the event of the complainant made a request to engage a third party investigation, the Company will consider the request by engaging an independent counsellor.


## 8.0 DISCIPLINARY PROCEDURE

8.1 Upon completion of the investigation as in clause 6.0 above, and if the misconduct of bullying is proven, the possible punishment to be imposed on the accused employee could be depending on the circumstances surrounding the matter and the seriousness of the matter as follows:

- (a) dismiss without notice the employee;
- (b) downgrade the employee; or
- (c) impose any other lesser punishment against the employee as the Management deems just and fit as follows:
  - (1) suspension without wages for a period not exceeding two weeks;
  - (2) written warning letter issued with a copy kept in the employee's personal file; or
  - (3) transfer to another department with no change in salary / benefits

8.2 Refer to Appendix A for the Formal Complaint, Investigation & Disciplinary Procedure Flowchart.

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## 9.0 FEEDBACK TO THE COMPLAINANT

- 9.1 The complainant shall be informed of the outcome of the investigation or if disciplinary action is taken against the alleged bully, of the outcome of the disciplinary action.
- 9.2 Although the Company encourages employees suffering from bullying to report the matter immediately, the employees are expected to act in good faith.
- 9.3 If the allegation is proven after the investigation or inquiry to be false, fabricated, frivolous, vexatious, unjustified, baseless and / or if the complaint was made in bad faith, such action by the complainant would be treated as a misconduct can be subject to appropriate disciplinary action.

## 10.0 COUNSELLING

- 10.1 Counselling session will be arranged for both the complainant and alleged bully.
- 10.2 The counselling session is intended to provide psychological support to the victim.
- 10.3 The counselling session is intended to educate and rectify the behaviour of the alleged bully to prevent recurrence.


## 11.0 EDUCATIONAL PROGRAMMES

- 11.1 Prevention is the most effective tool any employer can use to eradicate bullying in the workplace. Preventive action includes:
- (a) Communication;
  - (b) Education; and
  - (c) Training.
- 11.2 The Company shall provide training programme to both Management and employees regularly such as during orientation/ assembly/ briefing/ annual refresher, in which employees could be educated in the area of prevention of bullying behaviour.
- 11.3 The training programs shall cover the fundamental rights of an employee to be respected, ways to identify the forms of bullying behaviour, prevention & handling methods, and the reporting mechanism in place.

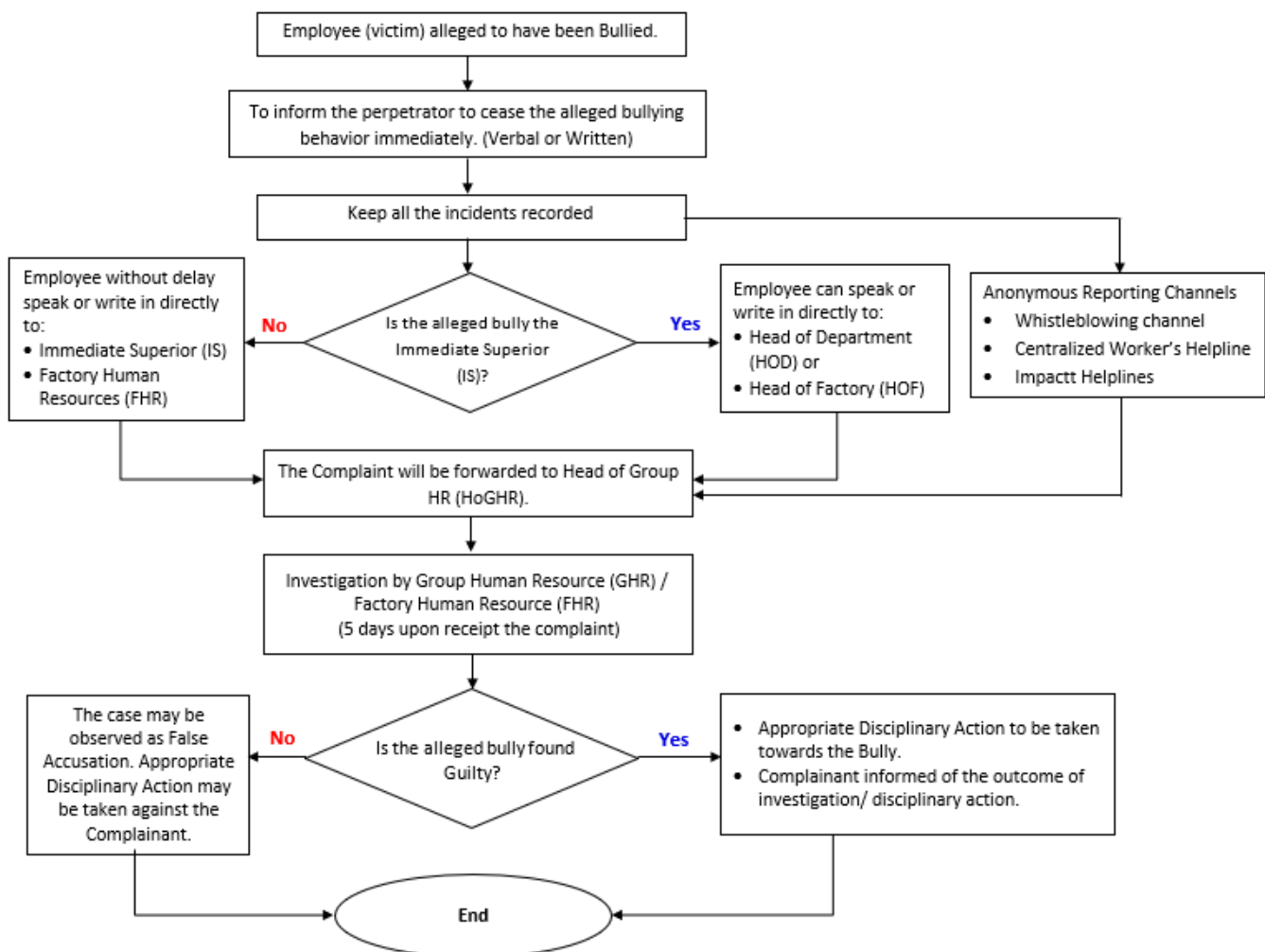
## 12.0 DISCLAIMER

- 12.1 The Company shall review and update the Policy from time to time as and when required.


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## Appendix A: Formal Complaint, Investigation & Disciplinary Procedure



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