Sustainability Policy

Grievance Handling Protocol
Introduction

Top Glove Corporation Bhd is wholly committed to ensuring its business is managed and products are manufactured in a sustainable manner. This is realised through continual engagement and assessment of its business partners based on metrics including how they conserve and improve the natural environment; uplift employee socioeconomic wellbeing; and conduct business ethically and responsibly. All Business Partners are required to adhere to the principles of the Top Glove Sustainability Policy and the Business Partners Code of Conduct, and adopt practices within their operations and supply chains consistent with the said Policy and Code.

This Grievance Handling Protocol is developed for effective grievance management, towards monitoring and promoting compliance of the Top Glove Sustainability Policy and Business Partners Code of Conduct. This protocol consists of a comprehensive process supporting the resolution of grievances by linking business and grievance resolutions and applies after grievances have been assessed and confirmed to violate our policies. Grievances may be raised by stakeholders in relation to Top Glove’s operations and Top Glove’s business partners. The process for receiving, logging and verifying all grievances raised is outlined in the Grievance Flow Chart on page 2.

Top Glove believes that business partner engagement and stakeholder collaboration are the fundamental elements of creating responsible supply chains and contributing to sustainable landscapes. With the newly launched Top Glove Sustainability Policy, we aim to engage actively with all our business partners and promote open exchanges to continuously improve our respective practices. We stand by business partners who demonstrate a willingness to contribute to a sustainable practice. In the event business partners are proven to have committed chronic non compliances or serious violations of our policies and commitments, or fail to deliver on agreed improvements, they will be subject to a recommendation for “cessation of business”.
GRIEVANCE FLOW CHART

Receipt of Grievance Case
Incidents uncovered through Top Glove’s own due diligence and monitoring, and reports from stakeholders e.g., civil society organizations, buyers, communities.

Determine the legitimacy of Grievance Case [10 working days]

- Thank and notify Grievance Raiser that grievance has been accepted
- Verification Team to engage with grievance raiser
- Prepare the Grievance Investigation Form with listing of cases or potential breach of Sustainability Policy
- Log incident into Grievance List and periodic updates on status to be made until case is closed

Is there sufficient evidence?
- Yes
- Is additional evidence needed from Grievance Raiser? [5 working days]
- Request Grievance Raiser for additional evidence
- No
- If the grievance in relation to:
  - No
  - Critical Grievance Case with verified proof of
    a. deforestation or new peatland development from 1 April 2019 and/or
    b. severe human rights abuse human trafficking, forced labour or imminent endangerment of human life, including threats, intimidation and violence against environmental, human rights and land defenders, workers, communities, community spokespeople and grievance raisers.

Top Glove’s Operation

Immediately inform Head of Department/Factory to commence immediate action to resolve the Grievance Case. [15 working days]

Head of Department/Factory to update implementation status and prepare Corrective Action & Preventive Action Report.

Verification Team to regularly monitor and review the action plan to ensure that progress has been made

Thank Grievance Raiser for notification of non compliances and provide update on how the compliance issue will be addressed

Top Glove’s Business Partner

All other grievance cases

Jointly develop action plan with Business Partner for resolution of the Grievance Case [1 to 6 months depending on the case]

Business Partner commits and agrees to the implementation of a time bound action plan

Business Partner is not willing to comply or fails to make progress according to the time bound action plan

Recommend for cessation of business

Refer to the Re-Entry Criteria for Business Partner re-entry to Top Glove’s supply chain

Version 1.0 [Effective date: 15062022]
# Top Glove Business Partner Re-Entry Criteria

In order to be eligible for re-entry into Top Glove’s supply chain, a Business Partner under “cessation of business” for violation of the provisions within the Top Glove Sustainability Policy or Top Glove Business Partners Code of Conduct, must demonstrate it meets the following minimum requirements:

<table>
<thead>
<tr>
<th>New cases of deforestation and new development on peatland (Post 1 April 2019)</th>
<th>Other grievances linked to non compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Implement an immediate moratorium on land clearing and peatland development including an immediate management directive that operationalises the moratorium through a Stop Work Order with immediate effect;</td>
<td>With other grievances related to non compliance, a prescriptive approach may not be applicable as the nature of each grievance will vary, and depending on the complexity, the required progress and level of urgency needed for resolution will also vary.</td>
</tr>
<tr>
<td>2. Acknowledge the total area of non compliant development (areas developed post 1 April 2019) and publicly commit to resolving the non compliant development through a credible and comprehensive Remediation Plan;</td>
<td>Top Glove, together with its suppliers and, as required, third party experts, will determine the milestones / criteria that need to be met in order to resume business.</td>
</tr>
<tr>
<td>3. Immediately halt all planting activities on non compliant development areas (pending development of a Remediation Plan);</td>
<td></td>
</tr>
<tr>
<td>4. Commit to conduct integrated HCV-HCS assessments for any new land development, which is approved by the HCVRN Quality Review Panel;</td>
<td></td>
</tr>
<tr>
<td>5. Publish a Sustainability Policy or sign an agreement or letter undertaking to comply with the Top Glove Sustainability Policy and Business Partners Code of Conduct;</td>
<td></td>
</tr>
<tr>
<td>6. Development of a time bound action plan reviewed and accepted by Top Glove to address all relevant grievance issues, including a commitment to develop a Remediation Plan for all non compliances in relation to deforestation and peatland development within 6 months.</td>
<td></td>
</tr>
</tbody>
</table>