

# TOP GLOVE CORPORATION BHD

 <b>TOP GLOVE</b> TOP QUALITY, TOP EFFICIENCY	<b>HUMAN RESOURCE MANUAL</b>	<b>Revision No.</b> 2
<b>Effective Date</b> 1.9.2015	<b>REWARDS &amp; PERFORMANCE</b>	<b>No of Pages</b> 29
	<b>HR MANUAL: HUMAN RIGHTS AND ETHICAL CONDUCT</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
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 individual 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 breached 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 ManualEmployee 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 breached 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:
- Dismissal without notice
  - Demotion
  - Suspension from work without pay
  - Written warning
  - 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**

 <b>The Rights of Freedom of Association and Collective Bargaining</b> Our enterprise respects the right of workers to form unions or other kinds of workers' associations and to engage in collective bargaining.	 <b>Ethical business behaviour</b> Our enterprise does not tolerate any acts of corruption, extortion, embezzlement or bribery.
 <b>Fair remuneration</b> Our enterprise respects the right of workers to receive fair remuneration.	 <b>No discrimination</b> Our enterprise provides equal opportunities and does not discriminate against workers.
 <b>Occupational health and safety</b> Our enterprise ensures a healthy and safe working environment, assessing risk and taking all necessary measures to eliminate or reduce it.	 <b>Decent working hours</b> Our enterprise observes the law regarding hours of work.
 <b>Special protection for young workers</b> Our enterprise provides special protection to any workers that are not yet adults.	 <b>No child labour</b> Our enterprise does not hire any worker below the legal minimum age.
 <b>No bonded labour</b> Our enterprise does not engage in any form of forced, servitude, trafficked or non voluntary labour.	 <b>Protection of the environment</b> Our enterprise takes the necessary measures to avoid environmental degradation.

**amfori BSCI Approach**

 <b>Code Observance</b> Our enterprise is obliged to protect workers' rights as mandated by the law and the amfori BSCI Code.	 <b>Supply Chain Management and Cascade Effect</b> Our enterprise uses the amfori BSCI Principles to influence other business partners.
 <b>Workers' Involvement and Protection</b> Our enterprise keeps workers informed about their rights and responsibilities.	 <b>Grievance Mechanism</b> Our enterprise provides a system to collect complaints and suggestions from employees.

[www.amfori.org](http://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](http://www.ethicaltrade.org)

 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

**Ethical Trading Initiative**  
Respect for workers worldwide

**Why commit to the ETI Base Code?**

[www.ethicaltrade.org](http://www.ethicaltrade.org)

 <b>Employment is freely chosen</b> <small>Slavery and bonded labour are totally unacceptable. Almost 21 million people are victims of forced labour.</small>	 <b>Freedom of association and the right to collective bargaining are respected</b> <small>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.</small>	 <b>Working conditions are safe and hygienic</b> <small>An estimated 2.3 million people die every year from work-related accidents and diseases.</small>
 <b>Child labour shall not be used</b> <small>168 million children work to support their families, missing out on education and often damaging their health. This reinforces the cycle of poverty.</small>	 <b>Living wages are paid</b> <small>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.</small>	 <b>Working hours are not excessive</b> <small>Long working hours are the norm for most of the world's workers. This damages people's health and undermines family life.</small>
 <b>No discrimination is practised</b> <small>Women and certain minorities are often confined to the lowest-paid jobs with no access to training or promotion.</small>	 <b>Regular employment is provided</b> <small>Most workers can be laid off when it suits the employer. This fuels poverty and insecurity and drives down wages.</small>	 <b>No harsh or inhumane treatment is allowed</b> <small>Few workers have protection against physical, verbal or sexual abuse in the workplace.</small>

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## Appendix 3.2: TG Occupational Safety and Health Policy

<b>TOP GLOVE</b> TOP QUALITY, TOP EFFICIENCY
TOP GLOVE GROUP OF COMPANIES
<b>OCCUPATIONAL SAFETY AND HEALTH POLICY</b>
<p>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.</p> <p>TOP GLOVE will constantly strive for the following:</p> <ol style="list-style-type: none"><li>1) To comply with applicable local Safety and Health legislations, regulations and other requirements;</li><li>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);</li><li>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;</li><li>4) Ensure that employees and contractors are suitably engaged and encouraged to participate actively in safety and health performance;</li><li>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;</li><li>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;</li><li>7) Management Safety and Health Committee shall strive to continuously improve standards and culture towards Safety and Health across the whole organisation.</li></ol> <p>The policy shall be reviewed and revised for its continuing suitability and be disseminated to all relevant parties.</p> <p>"Safety Is Our Responsibility, Continuous Improvement And Innovation Are Our Duties"</p> <p> Tan Sri Lim Wee Chai Chairman Date: 7/11/17</p> <p> Mr. Lee Kim Meow Managing Director Date: 03/01/17</p> <p>Last updated on: 13/10/2017</p>

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## Appendix 3.3: TG Environmental Policy



**TOP GLOVE**  
TOP QUALITY, TOP EFFICIENCY

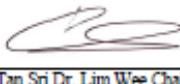
## Environmental Policy

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.

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

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## Appendix 3.4: TG Anti Bribery & Anti Corruption Policy

Apx 08 C ABM TG GM Anti Bribery Guidance Manual

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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 (01.04.2028)

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### MANUAL HR: HAK MANUSIA DAN TATALAKU BERETIKA

**Top Glove berhak untuk mengubah, meminda, membatalkan atau mengenepikan mana-mana polisi, prosedur atau syarat tanpa notis dan tanpa penyemakan semula.**

#### 1. OBJEKTIF

Objektif polisi ini adalah untuk memastikan Syarikat dan semua pekerjaanya mematuhi Inisiatif Pematuhan Sosial selaras dengan peraturan dan keperluan undang-undang.

#### 2. SKOP

Polisi ini meliputi semua pekerja Syarikat yang terdiri daripada Top Glove Corporation Berhad dan semua anak syarikatnya [TG atau Syarikat].

#### 3. LAMPIRAN

3.1 Poster untuk Kod Tatakelakuan BSCI & Kod Asas ETI

3.2 Polisi Keselamatan dan Kesihatan Pekerjaan TG

3.3 Polisi Alam Sekitar TG

3.4 Polisi Anti Rasuah & Anti Rasuah TG

#### 4. POLISI

##### 4.1 Pekerjaan yang Dipilih Secara Bebas & Tiada Buruh Paksa

4.1.1 Tidak dipaksa (bekerja di bawah ancaman penalti), terikat atau inden (dipaksa bekerja untuk membayar hutang).

4.1.2 Buruh penjara bukan sukarela; perhambaan atau pemerdagangan orang tidak boleh digunakan.

4.1.3 Majikan tidak memegang dokumen asal pekerja. Sila rujuk *Manual HR: Penyimpanan Pasport Pekerja Asing*.

4.1.4 Kontrak Pekerjaan hendaklah disediakan dalam bahasa yang boleh difahami oleh pekerja sebelum memulakan pekerjaan.

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- 4.1.5 Kontrak Pekerjaan hendaklah mengandungi perihal tugas mereka, maklumat mengenai waktu bekerja, kadar gaji dan faedah lain.
- 4.1.6 Sekiranya pekerja itu buta huruf, pekerja yang berpengalaman hendaklah menterjemah kandungan Kontrak Pekerjaan sebelum mendapat kebenaran untuk terlibat dalam pekerjaan.
- 4.1.7 Sama ada majikan atau pekerja boleh pada bila-bila masa memberi notis kepada satu sama lain untuk menyatakan hasrat untuk menamatkan kontrak perkhidmatan tersebut.
- 4.1.8 Tempoh notis sedemikian hendaklah sama untuk majikan dan pekerja dan perlu ditentukan oleh peruntukan yang dibuat dalam kontrak pekerjaan.
- 4.1.9 Kontrak pekerjaan boleh ditamatkan serta merta dengan pampasan sebagai ganti notis.

## 4.2 Tiada Pekerja Bawah Umur

- 4.2.1 Setiap individu umur disahkan berdasarkan maklumat yang diberikan dalam dokumen peribadinya sebelum mula bekerja.
- 4.2.2 Memandangkan syarikat beroperasi dalam industri pembuatan, tiada sesiapa di bawah umur 18 tahun boleh diambil sebagai pekerja.
- 4.2.3 Sekiranya berlaku pengambilan kanak-kanak / orang muda secara tidak sengaja, dia hendaklah dikeluarkan dari tapak serta merta dengan pampasan sebagai ganti notis.
- 4.2.4 Siasatan lanjut akan dijalankan dan tindakan tatatertib akan diambil terhadap jabatan yang didapati melanggar peraturan ini.

## 4.3 Gaji Minimum dan Waktu Bekerja

- 4.3.1 Pampasan yang dibayar kepada pekerja hendaklah mematuhi semua undang-undang gaji yang terpakai, termasuk yang berkaitan dengan gaji minimum, waktu lebih masa dan faedah yang dimandatkan oleh undang-undang.
- 4.3.2 Waktu bekerja dan lebih masa hendaklah dihadkan kepada apa yang boleh diterima oleh undang-undang tempatan dan maklumat itu hendaklah disampaikan kepada semua pekerja secara bertulis melalui memo atau saluran komunikasi lain.

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- 4.3.3 Tindakan tata tertib akan diambil terhadap jabatan yang didapati melanggar peraturan ini tanpa alasan yang munasabah.
- 4.3.4 Gaji hendaklah dibayar secara berkala.

## 4.4 Kebebasan Berpersatuan dan Hak untuk Perundingan Kolektif

- 4.4.1 Pekerja mempunyai hak untuk berpesatuan atau tidak berpesatuan dengan organisasi pihak ketiga, menyertai atau tidak menyertai kesatuan sekerja, mendapatkan perwakilan, berunding atau tidak berunding secara kolektif mengikut undang-undang tempatan.
- 4.4.2 Syarikat tidak mendiskriminasi ahli mana-mana kesatuan sekerja kerana mereka diberi peluang yang sama rata seperti pekerja lain.
- 4.4.3 Pilihan Raya Umum untuk Wakil Pekerja hendaklah diadakan sekali dalam setiap dua tahun atau berdasarkan keperluan. Calon dengan undi majoriti akan dipilih untuk mewakili pekerja dari kewarganegaraannya semasa mesyuarat dengan pihak pengurusan (jika ada).
- 4.4.4 Syarikat membenarkan wakil pekerja mengakses pekerja di tempat kerja.
- 4.4.5 Kuasa tersebut akan dibatalkan jika syarat tersebut mengakibatkan sebarang salah laku atau kecuaian dalam melaksanakan tugas mana-mana pihak (wakil pekerja atau mana-mana pekerja).

## 4.5 Anti Diskriminasi (Layanan Kemanusiaan)

- 4.5.1 Gangguan dan diskriminasi yang menyalahi undang-undang tidak boleh diterima di mana-mana peringkat pekerjaan; termasuk bangsa, warna kulit, agama, asal negara, umur, ketidakupayaan, penyakit, orientasi seksual, identiti jantina, status perkahwinan (termasuk kehamilan), tanggungjawab keluarga, latar belakang sosial dan rekod jenayah.
- 4.5.2 Perlakuan kasar atau tidak berperikemanusiaan tidak boleh diterima; termasuk semua jenis gangguan (seksual/fizikal/lisan), penderaan seksual, hukuman badan, perhambaan, paksaan mental atau fizikal atau penderaan lisan terhadap pekerja, dan tiada sebarang ancaman perlakuan sedemikian.

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- 4.5.3 Pekerja hendaklah berusaha untuk mengekalkan persekitaran kerja yang sihat, selamat dan produktif dengan mematuhi piawaian tertinggi kelakuan profesional. Mereka hendaklah dari segala segi dan pada setiap masa, berkelakuan jujur, kewajaran dan tidak boleh dalam apa jua keadaan, melakukan sebarang perbuatan yang boleh membawa kerosakan kepada Syarikat, pekerjaannya, harta benda, reputasi atau kepentingan umum.
- 4.5.4 Pekerja diharapkan mempunyai rasa hormat dan toleransi terhadap budaya dan agama serta mengekalkan persekitaran kerja yang bebas daripada diskriminasi atau gangguan.
- 4.5.5 Pekerja hendaklah mengelakkan sebarang kelakuan di tempat kerja yang mewujudkan, menggalakkan atau membenarkan dan persekitaran kerja yang menyinggung, menakutkan atau tidak sesuai termasuk, tetapi tidak terhad kepada:
- Ugutan atau komen yang mengandungi unsur diskriminasi atau gangguan.
  - Pendahuluan seksual yang tidak diingini.
  - Tingkah laku atau tindakan ganas.
  - Penyalahgunaan atau penyalahgunaan kedudukan pihak berkuasa.
  - Pakaian yang tidak sesuai yang melanggar dasar kod pakaian Syarikat.

## 4.6 Integriti

### A. Anti Rasuah & Rasuah

- 4.6.1 Syarikat tidak akan bertolak ansur dengan sebarang bentuk rasuah dan rasuah. Sila rujuk *Lampiran 3.4* untuk *Polisi Anti Rasuah & Anti Rasuah TG*.
- 4.6.2 Pekerja hendaklah merekod dan melaporkan semua maklumat dengan tepat dan berintegriti.
- 4.6.3 Rekod hendaklah diuruskan dengan selamat selaras dengan kepentingannya dan mematuhi keperluan undang-undang, cukai, kawal selia, perakaunan dan pengekalan perniagaan lain seperti yang dikehendaki oleh undang-undang di Negara ini dan juga mengikut keperluan dasar Undang-undang.

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- 4.6.4 Pekerja tidak boleh menawarkan, memberi, meminta atau menerima rasuah untuk mencapai kelebihan perniagaan atau peribadi untuk diri mereka sendiri atau orang lain atau terlibat dalam sebarang transaksi yang boleh ditafsirkan sebagai melanggar undang-undang pencegahan rasuah.
- 4.6.5 Pekerja hendaklah menyedari hakikat bahawa rasuah mungkin dalam sebarang bentuk, kewangan atau sebaliknya termasuk tetapi tidak terhad kepada imbuhan yang tidak dibenarkan seperti yuran rujukan, komisen atau pampasan lain yang serupa, barang material, perkhidmatan, hadiah, kemudahan perniagaan, premium atau diskaun dengan nilai yang tidak sesuai atau pada tahap yang tidak munasabah atau yang secara amnya tidak ditawarkan kepada orang lain atau yang dilarang oleh undang-undang atau boleh dilihat secara munasabah sebagai telah melintasi sempadan amalan perniagaan yang beretika dan sah.
- 4.6.6 Sebelum memberi atau menerima sebarang kemudahan perniagaan atau hadiah lain (dalam apa juu bentuk atau nilai), pekerja hendaklah menilai kesesuaian tindakan mereka dengan menilai sama ada tindakan itu boleh mempengaruhi atau secara munasabah boleh memberi kesan mempengaruhi hubungan perniagaan Syarikat dengan organisasi atau individu itu atau sebarang keputusan perniagaan yang timbul daripada hubungan perniagaan itu.
- 4.6.7 Pekerja hendaklah mengisytiharkan semua hadiah yang diterima kepada GHOD masing-masing atau pegawai atasan segera dan menyerahkan hadiah tersebut kepada Unit Integriti Top Glove.
- 4.6.8 Pekerja tidak boleh menerima sebarang keraian yang tidak sepatusnya daripada mana-mana klien Syarikat, pelanggan, pembekal, kontraktor Syarikat atau mana-mana bahagian yang mempunyai urusan perniagaan dengan Syarikat tanpa kebenaran pihak pengurusan terlebih dahulu.
- 4.6.9 Pekerja hendaklah terikat dengan prosedur Hadiah, Hospitaliti & Hiburan yang ditetapkan oleh syarikat.
- 4.6.10 Pekerja tidak dibenarkan menjual, mengedar atau bertindak sebagai ejen untuk penjualan atau pengedaran apa-apa jenis makanan atau barang di premis pejabat sama ada semasa atau di luar waktu pejabat.
- 4.6.11 Tindakan tatatertib akan diambil terhadap pekerja yang didapati melanggar polisi Syarikat.

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4.6.12 Syarikat tidak akan teragak-agak untuk menamatkan perkhidmatan dan/atau mengambil tindakan undang-undang terhadap rakan kongsi perniagaan yang tidak bertanggungjawab/tidak profesional yang didapati merasuh pekerja Syarikat atau menghasut mereka untuk menerima rasuah.

## B. Anti Pemburuan Pekerja

- 4.6.13 Syarikat mengamalkan pengambilan beretika dan melabur dalam banyak sumber dan masa untuk melatih pekerjanya. Sila rujuk Manual HR – Skim Rujukan Pekerja.
- 4.6.14 Pemburuan haram pekerja adalah satu amalan yang tidak baik dan Syarikat menuntut rakan kongsi perniagaannya untuk bertanggungjawab secara sosial dan beretika dalam pendekatan mereka dan tidak seharusnya melibatkan diri dalam bakat pemburuan haram dengan menarik pekerja Syarikat untuk menyertai mereka.
- 4.6.15 Rakan kongsi perniagaan yang didapati memburu pekerja Syarikat hendaklah dilihat sebagai tidak beretika dan tidak profesional, yang boleh menjelaskan hubungan perniagaan.

## 4.7 Privasi dan Keselamatan Maklumat

- 4.7.1 Syarikat hendaklah mematuhi undang-undang privasi dan keselamatan maklumat serta keperluan kawal selia apabila mengumpul, menggunakan, memproses atau menyimpan maklumat peribadi.
- 4.7.2 Tiada pekerja dibenarkan sama ada semasa atau selepas penamatan pekerjaan mereka dengan Syarikat, untuk membincangkan atau mendedahkan maklumat sulit berkaitan perniagaan syarikat dan butiran pelanggannya secara langsung dan tidak langsung kepada sesiapa, terutamanya kepada pesaing.
- 4.7.3 Pekerja tidak seharusnya berbincang sama ada sesama mereka atau dengan orang lain, di dalam tempat kerja atau di luar premis Syarikat, maklumat sulit mengenai Syarikat, rakan kongsi perniagaan, pelanggan atau klien, pekerjanya atau sebarang maklumat sulit lain kecuali semasa menjalankan perniagaan Syarikat.

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- 4.7.4 Sebarang maklumat yang berkaitan dengan Syarikat dalam apa jua cara sekalipun dan yang tidak tersedia secara umum kepada orang ramai hendaklah dikendali dengan penuh keyakinan. Maklumat sedemikian tidak boleh dikongsi atau digunakan oleh mana-mana pekerja sama ada secara langsung atau tidak langsung untuk mempengaruhi keputusan pelaburan berkaitan dengan pembelian atau penjualan sekuriti.
- 4.7.5 Kewajipan pertama mana-mana pekerja yang menerima pesanan atau permintaan lain yang meminta pendedahan maklumat sulit berkaitan Syarikat adalah menghubungi pihak atasan terdekatnya atau Pengurus Sumber Manusia untuk mendapatkan bimbingan.
- 4.7.6 Pekerja hendaklah memaklumkan kepada pihak atasan terdekatnya jika ahli media menghubunginya untuk sebarang maklumat, kenyataan atau pendapat mengenai Syarikat. Pihak atasan hendaklah memberikan panduan kepada pekerja mengenai maklum balas yang sewajarnya kepada permintaan media.
- 4.7.7 Seseorang pekerja tidak boleh membuat sebarang kenyataan awam, termasuk di Media Sosial, tentang polisi atau keputusan Syarikat sama ada secara lisan atau bertulis atau dalam apa jua bentuk sekalipun dan dia juga tidak boleh mengedarkan atau menyebabkan untuk diedarkan apa-apa kenyataan sedemikian.
- 4.7.8 Pekerja tidak dibenarkan untuk menerbitkan atau mengedar dalam sebarang bentuk bertulis atau bercetak, artikel, buku, terbitan berkala, risalah, risalah dan lain-lain yang mengandungi maklumat berkaitan Syarikat tanpa kelulusan bertulis terlebih dahulu daripada Syarikat.
- 4.7.9 Mana-mana pekerja yang telah dijemput untuk hadir sebagai penceramah jemputan dalam forum awam mesti, jika dia bercadang untuk membuat penampilan sedemikian, menyerahkan butiran dan/atau topik ucapan yang dicadangkannya. Pihak atasan hendaklah menyerahkan perkara yang sama kepada pihak pengurusan untuk pertimbangan mereka. Seorang pekerja hanya boleh membuat penampilan sedemikian jika kelulusan terlebih dahulu telah diperolehi.
- 4.7.10 Tindakan tatatertib akan diambil terhadap pekerja yang didapati melanggar polisi Syarikat.

## 4.8 Kesihatan dan Keselamatan Tempat Kerja

- 4.8.1 Syarikat memastikan Pekerjanya berada dalam persekitaran yang selamat, dilindungi daripada bahaya pekerjaan.
- 4.8.2 Di mana perlu, pekerja disediakan peralatan keselamatan yang sesuai dengan kerja yang dijalankan.

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- 4.8.3 Syarikat menyediakan akses sedia untuk kemudahan tandas yang bersih, air yang boleh diminum dan penyediaan makanan yang bersih, penyimpanan dan kemudahan makan untuk pekerjanya.
- 4.8.4 Asrama yang disediakan perlu diselenggara dalam keadaan bersih dan selamat dengan pengudaraan yang mencukupi.
- 4.8.5 Prosedur dan sistem disediakan untuk mengurus, mengesan dan melaporkan kecederaan dan penyakit pekerjaan. Prosedur tindak balas kecemasan juga disediakan untuk menangani situasi yang tidak dijangka.
- 4.8.6 **Polisi Keselamatan dan Kesehatan Pekerjaan TG** seperti yang diperuntukkan dalam *Lampiran 3.2* hendaklah menyampaikan pernyataan komitmen Syarikat.
- 4.8.7 Untuk butiran lanjut, sila rujuk prosedur keselamatan dalam **TG Focus: Panduan Sistem 02 OSHA**.

## 4.9 Persekutaran

- 4.9.1 Syarikat komited untuk terus memelihara alam sekitar.
- 4.9.2 **Polisi Alam Sekitar TG** seperti yang diperuntukkan dalam Lampiran 3.3 hendaklah menyampaikan pernyataan komitmen Syarikat.
- 4.9.3 Untuk butiran, sila rujuk **GL MA P02: Infrastruktur & Persekutaran Kerja (Persekutaran Bangunan)**.

## 4.10 Tindakan Tatatertib

- 4.10.1 Mana-mana pekerja yang melakukan salah laku atau pelanggaran peraturan yang ditetapkan oleh Syarikat, akan dikenakan tindakan tatatertib.
- 4.10.2 Salah laku dalam pekerjaan boleh ditangani secara umum di bawah tiga (3) tajuk iaitu:
  - a. Salah laku yang berkaitan dengan integriti dan kewajipan, seperti kecuaian, penyelewengan, pembangkangan, pelanggaran maklumat sulit Syarikat, dsb;
  - b. Salah laku yang berkaitan dengan disiplin, seperti pergaduhan, penipuan, kecurian, serangan, pertengkaran, perjudian, kerosakan harta Syarikat, penyalahgunaan dadah, dsb; dan

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- c. Salah laku yang berkaitan dengan moral, seperti melakukan perbuatan tidak senonoh, kemajuan seksual, pornografi, menyimpan atau mengedarkan bahan tidak senonoh atau lucu di tempat kerja, dsb.
- 4.10.3 Panel yang dilantik mengikut budi bicara Syarikat hendaklah menjalankan semua pertanyaan. Panel siasatan tidak boleh termasuk ahli yang kehadirannya boleh menjelaskan kesaksamaan panel dalam menjalankan prosiding dan cadanganya.
- 4.10.4 Prosiding siasatan hendaklah direkodkan dengan sewajarnya oleh panel untuk dikemukakan kepada Ketua Sumber Manusia (HR) atau kepada pihak berkuasa atasan yang berkenaan untuk membuat keputusan.
- 4.10.5 Syarikat boleh menggantung pekerja separuh gaji untuk tempoh tidak melebihi dua (2) minggu sementara menunggu siasatan.
- 4.10.6 Semua tindakan tatatertib yang diambil oleh Syarikat hendaklah mematuhi prosedur dan perundangan semasa Syarikat yang ditetapkan. Sekiranya terdapat sebarang konflik antara kedua-duanya, perundangan semasa akan digunakan.
- 4.10.7 Ketua Jabatan boleh mengeluarkan amaran bertulis atas nasihat jabatan HR. Semua amaran bertulis hendaklah direkodkan dalam fail peribadi pekerja. Sekiranya tiga (3) surat amaran telah dikeluarkan dalam tempoh dua belas (12) bulan, pekerja hendaklah tertakluk kepada siasatan untuk menentukan tindakan tatatertib selanjutnya.
- 4.10.8 Berdasarkan kepada keseriusan kesalahan yang dilakukan dan selepas siasatan yang sewajarnya, pekerja boleh dikenakan mana-mana hukuman berikut:
  - a. Pemecatan tanpa notis
  - b. Turun pangkat
  - c. Penggantungan kerja tanpa gaji
  - d. Amaran bertulis
  - e. Mengenakan sebarang hukuman lain yang difikirkan adil dan sesuai oleh Syarikat
- 4.10.9 Syarikat berhak untuk memecat pekerja selepas siasatan sewajarnya untuk salah laku.
- 4.10.10 Hak ini adalah tambahan kepada dan tidak menjelaskan haknya yang lain di bawah undang-undang.
- 4.10.11 Seseorang pekerja yang telah dikenakan tindakan tatatertib berhak untuk merayu secara bertulis dalam tempoh tiga puluh (30) hari selepas pengumuman keputusan kepada Pengarah Urusan atau Penggerusi.

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# TOP GLOVE CORPORATION BHD

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Lampiran 3.1: Poster untuk Kod Tatakelakuan BSCI & Kod Asas ETI

## 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

	<b>The Rights of Freedom of Association and Collective Bargaining</b> Our enterprise respects the right of workers to form unions or other kinds of workers' associations and to engage in collective bargaining.		<b>Ethical business behaviour</b> Our enterprise does not tolerate any acts of corruption, extortion, embezzlement or bribery.
	<b>Fair remuneration</b> Our enterprise respects the right of workers to receive fair remuneration.		<b>No discrimination</b> Our enterprise provides equal opportunities and does not discriminate against workers.
	<b>Occupational health and safety</b> Our enterprise ensures a healthy and safe working environment, assessing risk and taking all necessary measures to eliminate or reduce it.		<b>Decent working hours</b> Our enterprise observes the law regarding hours of work.
	<b>Special protection for young workers</b> Our enterprise provides special protection to any workers that are not yet adults.		<b>No child labour</b> Our enterprise does not hire any worker below the legal minimum age.
	<b>No bonded labour</b> Our enterprise does not engage in any form of forced, servitude, trafficked or non-voluntary labour.		<b>No precarious employment</b> Our enterprise hires workers on the basis of documented contracts according to the law.
			<b>Protection of the environment</b> Our enterprise takes the necessary measures to avoid environmental degradation.

### amfori BSCI Approach

	<b>Code Observance</b> Our enterprise is obliged to protect workers' rights as mandated by the law and the amfori BSCI Code.		<b>Supply Chain Management and Cascade Effect</b> Our enterprise uses the amfori BSCI Principles to influence other business partners.
	<b>Workers' Involvement and Protection</b> Our enterprise keeps workers informed about their rights and responsibilities.		<b>Grievance Mechanism</b> Our enterprise provides a system to collect complaints and suggestions from employees.

[www.amfori.org](http://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](http://www.ethicaltrade.org)

 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

**Ethical Trading Initiative**  
Respect for workers worldwide

**Why commit to the ETI Base Code?**

[www.ethicaltrade.org](http://www.ethicaltrade.org)

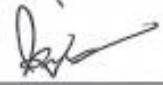
 <b>Employment is freely chosen</b> <small>Slavery and bonded labour are totally unacceptable. Almost 21 million people are victims of forced labour.</small>	 <b>Freedom of association and the right to collective bargaining are respected</b> <small>Tens of thousands of workers lose their jobs every year for attempting to form or join a trade union or improve working conditions. Some even lose their lives.</small>	 <b>Working conditions are safe and hygienic</b> <small>An estimated 2.3 million people die every year from work-related accidents and diseases.</small>
 <b>Child labour shall not be used</b> <small>168 million children work to support their families, missing out on education and often damaging their health. This reinforces the cycle of poverty.</small>	 <b>Living wages are paid</b> <small>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.</small>	 <b>Working hours are not excessive</b> <small>Long working hours are the norm for most of the world's workers. This damages people's health and undermines family life.</small>
 <b>No discrimination is practised</b> <small>Women and certain minorities are often confined to the lowest-paid jobs with no access to training or promotion.</small>	 <b>Regular employment is provided</b> <small>Most workers can be laid off when it suits the employer. This fuels poverty and insecurity and drives down wages.</small>	 <b>No harsh or inhumane treatment is allowed</b> <small>Few workers have protection against physical, verbal or sexual abuse in the workplace.</small>

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## Lampiran 3.2: Polisi Keselamatan dan Kesihatan Pekerjaan TG

<p style="text-align: center;"><b>TOP GLOVE</b> TOP QUALITY, TOP EFFICIENCY TOP GLOVE GROUP OF COMPANIES</p> <p style="text-align: center;"><b>OCCUPATIONAL SAFETY AND HEALTH POLICY</b></p> <p>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.</p> <p>TOP GLOVE will constantly strive for the following:</p> <ol style="list-style-type: none"><li>1) To comply with applicable local Safety and Health legislations, regulations and other requirements;</li><li>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);</li><li>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;</li><li>4) Ensure that employees and contractors are suitably engaged and encouraged to participate actively in safety and health performance;</li><li>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;</li><li>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;</li><li>7) Management Safety and Health Committee shall strive to continuously improve standards and culture towards Safety and Health across the whole organisation.</li></ol> <p>The policy shall be reviewed and revised for its continuing suitability and be disseminated to all relevant parties.</p> <p style="text-align: center;">"Safety Is Our Responsibility, Continuous Improvement And Innovation Are Our Duties"</p> <p> Tan Sri Lim Wee Chai Chairman Date: 7/11/17</p> <p> Mr. Lee Kim Meow Managing Director Date: 03/11/17</p> <p>Last updated on: 11/10/2017</p>
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## Lampiran 3.3: Polisi Alam Sekitar TG



The document is titled "Environmental Policy" and features a decorative border of green ivy leaves. At the top center is the "TOP GLOVE" logo with the tagline "TOP QUALITY, TOP EFFICIENCY". Below the title, the text states: "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." The section "To achieve these, WE SHALL:" lists ten bullet points detailing environmental goals such as compliance with regulations, prevention of pollution, and promotion of sustainability. At the bottom, it says: "This policy shall be reviewed and revised for continuous improvement and sustainability, and will be disseminated to all relevant parties." Three signatures are present: Mr. Hue Kon Fah (Executive Director, Manufacturing), Dato' Lee Kim Meow (Managing Director), and Tan Sri Dr. Lim Wee Chai (Group Chairman). The document is dated 6/8/20, 10/8/20, and 12/8/20 respectively. A note at the bottom right indicates it was prepared by Thong Mei Qi (Group IETS) and last updated on 12th August 2020.

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## Lampiran 3.4: Polisi Anti Rasuah & Anti Rasuah TG

Apx 08 C ABM TG GM Anti Bribery Guidance Manual  
Page 1 of 1

**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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Effective Date

1.9.2015

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