

DUOPHARMA BIOTECH BERHAD GROUP
DIVERSITY, ANTI-DISCRIMINATION AND ANTI-HARASSMENT
POLICY

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1. Policy Statement

- 1.1 As a policy stance, Duopharma Biotech Berhad (“Duopharma Biotech” or the “Company”) is committed to provide a workplace free from all forms of discrimination and harassment and will meet its legislative obligations relating to discrimination and harassment. Duopharma Biotech will take all reasonable and practicable steps to provide and maintain a working environment free from behaviours and actions that may be discriminatory.
- 1.2 Notwithstanding, the Company also recognises the rights of shareholders (e.g. nomination of boardroom candidatures), requirements enshrined in national, state or government policies as well as conditions precedents on directorships, equity ownership or other requirements that may be present in prevailing or prospective tenders or contracts with counterparties including the government. As such, whilst the Company recognises the benefits of diversity and inclusion, the Company acknowledges the challenges of achieving the Company’s diversity objectives due to the legal and contractual obligations as well as the socio-economic context of the country.

2. Scope and Application

- 2.1 This Diversity, Anti-Discrimination and Anti-Harassment Policy (“Policy” or “Document”) is supplementary to the existing guidelines and policies within Duopharma Biotech so as to further enhance the overall governance infrastructure of the Duopharma Biotech group.
- 2.2 This Policy should be read together with the relevant enumerations encapsulated in the following authoritative promulgations:
- a. Federal Constitution;
 - b. Employment Act 1955 (Act 265);
 - c. Penal Code (Act 574);
 - d. Malaysian Code on Corporate Governance;
 - e. Main Market Listing Requirements of Bursa Malaysia Securities Berhad; and
 - f. other relevant local laws and regulations.
- 2.3 The internal reference documents which are to be referred to for this Policy include, but are not limited to the following:
- a. Code of Conduct;
 - b. Diversity Policy for the Board of Directors and Senior Management;
 - c. Whistleblowing Policy;
 - d. Investigation Procedure; and
 - e. Grievance Procedure.

- 2.4 Where there is a conflict between the contents of this Policy and the authoritative promulgations, the relevant enumerations contained in the said authoritative promulgations or the Company's Constitution shall prevail.
- 2.5 This Policy applies to all activities (including but not limited to activities at any place where the business of the Duopharma Biotech group is being carried out and other locations and situations, such as work-related off-site assignments and business travel, work-related conferences, training or social gatherings, or other locations where the prohibited conduct might have a subsequent impact on the work relationship, environment or performance) and to all levels of employees of the Duopharma Biotech group (including but not limited to such persons who are on full-time, part-time or probationary employment or on contract, secondment, apprenticeship, attachment or any persons by whatever description under the supervision of any member of the Duopharma Biotech group), customers, contractors, consultants, vendors, suppliers and visitors (including the members of the public).
- 2.6 An internal Grievance Procedure and Whistleblowing Policy exists and assists employees to raise issues and concerns related to discrimination and/or harassment. All complaints will be treated confidentially, seriously and sympathetically in accordance with the Company's relevant policies and procedures. No employee shall be penalised or disadvantaged as a result of raising genuine concern or complaint.
- 2.7 Breach of this Policy by any employee of the Duopharma Biotech group is considered employee misconduct and/or a breach of the terms or conditions of employment, and may result in disciplinary measures taken, including dismissal. Similarly, for any act of discrimination by contractors, suppliers, agents and vendors or requests by them for us to carry out any act of discrimination or harassment on any of the unlawful grounds may lead to termination of our service agreement with them.
- 2.8 For the purpose of this Policy, the phrase "Duopharma Biotech group" shall mean Duopharma Biotech Berhad and its subsidiary companies.

3. Diversity, Equity and Inclusion

- 3.1 The Company considers the concept of diversity to encompass various areas including, but not limited to gender, age, cultural background, education background, business and industry skills and experience.
- 3.2 Meanwhile, equity is the act of promoting justice, impartiality and fairness in everything that the Company does, to ensure everyone has equal opportunity.
- 3.3 In this context, inclusion is the practice of ensuring that all employees feel a sense of belonging in the Duopharma Biotech group and behaviors to respond to people in order to ensure that individual needs are met and they feel included and engaged within the workplace activities.
- 3.4 In line with the above philosophy, Duopharma Biotech will support the promotion of all aspects of this Policy and apply them in overall people practices at work including but not limited to practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; and the ongoing development of a work environment built on the premise of diversity, equity and inclusion that encourages and enforces, among others:
 - a. Respectful communication and cooperation between all employees.
 - b. Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
 - c. Employer and employee contributions to the communities Duopharma Biotech serves to promote a greater understanding and respect for diversity.

4. Anti-Discrimination

- 4.1 Any behaviours that is unwanted and offensive to the recipient, which creates an intimidating, hostile or humiliating work environment will not be tolerated in the Duopharma Biotech group. All employees shall be treated with dignity and respect and it is also all employee's responsibility to treat each other the same way and to practise the Company's Core Values of Passion, Excellence, Teamwork, Integrity, Respect & Responsible at all times.
- 4.2 Subject to the local laws of the respective jurisdictions in which the Duopharma Biotech group operates, discrimination on the basis of the following is unacceptable:
- a. Race and Religion (including nationality, religion, colour, ethnic or ethno-religious origin);
 - b. Gender-related (including marital status, pregnancy or potential pregnancy, breastfeeding and gender equality as adopted under the local laws);
 - c. Disability and Illness (including physical, psychiatric or intellectual disabilities);
 - d. Membership or non-membership of a union; or
 - e. Parental status, veteran status, military status and any status protected by the law.

5. **Anti-Harassment**

5.1 Any act of harassment is not acceptable and will not be tolerated in the Duopharma Biotech group.

5.2 In this regard:

- a. Harassment means any behaviour, whether spoken or written words, pictures or actions communicated in person or through the use of any media and/or physical conduct that is inappropriate or otherwise offensive to a person. It includes the use of any threatening, abusive or insulting words or behaviour; or by any threatening, abusive or insulting communication that is intended to cause harassment, alarm or distress to another person.
- b. Harassment has the purpose or effect of:
 - i. creating, directly or indirectly, an intimidating, hostile or offensive workplace or other place;
 - ii. interfering with the performance of an employee's functions, duties and responsibilities; or
 - iii. affecting employment opportunities including promotion or compensation.
- c. Harassment may be motivated by any of the following: race or ethnicity; skin colour or other physical attribute(s); religion; sex or gender; place of origin; ancestry; culture; age; mental or physical ability or disability; sexual orientation; family, marital or social status; economic or financial background; or political affiliation.

5.3 Under this Policy, harassment shall include sexual harassment as follows:

- a. Section 2 of the Employment Act 1955 (Act 265) defines sexual harassment as:
“any unwanted conduct of a sexual nature, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive or humiliating or is a threat to his well-being, arising out of and in the course of his employment”.
- b. For the purposes of this Policy, sexual harassment shall refer to:
 - i. “conduct of a sexual nature” includes any unwelcomed behaviour or unwanted conduct of a sexual nature in any form which includes but is not limited to, implied or overt verbal, non-verbal, visual, gestural or physical conduct;

- ii. any unwelcomed conduct of a sexual nature that a reasonable person would find offensive, humiliating or intimidating;
 - iii. any unwelcomed conduct in the form of spoken or written words, pictures or actions, communicated in person or through the use of any media;
 - iv. any behaviour that may amount to sexual harassment where a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated; or
 - v. any request, whether express or implied, for sexual favours by a manager, superior, subordinate, colleague or a non-employee.
- c. Examples of conduct that may amount to sexual harassment include, amongst others:
- i. Verbal harassment;
For example: Offensive or suggestive remarks, comments, jokes, jesting, kidding, sounds or questioning.
 - ii. Non-verbal/gestural harassment;
For example: Leering or ogling with suggestive overtones, licking lips or holding or eating food provocatively, hand signals or sign language denoting sexual activity or persistent flirting.
 - iii. Visual harassment;
For example: Showing pornographic materials, drawing sexually-charged sketches or images, writing sexually-charged letters or texts, sexual exposure or flashing of private parts.
 - iv. Psychological harassment;
For example: Repeated unwanted social invitations, relentless proposals for dates or physical intimacy.
 - v. Physical harassment;
For example: Inappropriate touching, patting, pinching, stroking, brushing up against the body, hugging, kissing, fondling or sexual assault.
 - vi. Online harassment;
For example: Communications via email, social media platforms, messaging apps, blogging platforms and comments sections on digital platforms; any form of threats, embarrassment, or humiliation in an online setting, including "cyberstalking" which is conduct or a course of conduct of online harassment.

6. Review and Amendments

- 6.1 The Management is responsible for the implementation of this policy and ensuring compliance with it. This policy will also be monitored by the Company to judge its effectiveness.
- 6.2 The Human Resource Department will periodically review this Policy to be in line with legislative promulgations and improved practices. All revisions or amendments to this Policy as recommended by the Human Resource Department will be submitted to the Management for consideration and approval.