

HUMAN RIGHTS POLICY

Luxchem Corporation Berhad

Wisma Luxchem, Block N, Jaya One, 72A,
Jalan Prof Diraja Ungku Aziz, Seksyen 13,
46200 Petaling Jaya, Selangor

CONTENTS

INTRODUCTION.....	2
SCOPE & APPLICABILITY	2
POLICY COMMITMENTS	2
No Child Labour	2
No Forced, Bonded or Involuntary Labour.....	2
No Discrimination and Equal Opportunity	3
Freedom of Association	3
Fair Labour Practices.....	3
Workplace Safety and Health.....	3
Workplace Security and Harassment Prevention	3
Fair Wages, Working Hours and Benefits	3
Privacy and Data protection	3
REPORTING OF HUMAN RIGHTS VIOLATION AND GRIEVANCE MECHANISM	4
HUMAN RIGHTS DUE DILIGENCE	4
TRAINING AND AWARENESS	4
GOVERNANCE, ROLES & RESPONSIBILITIES	4
POLICY REVIEW.....	5

1. INTRODUCTION

Luxchem Corporation Berhad and its subsidiaries (“The Group”) are committed to respecting and promoting Human Rights in all areas of operation, where applicable and practicable.

This Policy reflects the Group’s commitment to conducting its businesses and operations in a manner that respects, promotes and upholds the human rights and dignity of all employees, while complying with applicable laws and regulations in the Countries where we operate.

The Group strives to ensure that human rights are upheld across its businesses throughout its value chain.

2. SCOPE & APPLICABILITY

This Policy applies to all levels of employees within the Group, as well as to its Business Partners (Including agents, suppliers, service providers, joint venture partners and consultants). Business Partners are expected to adhere to the Code of Ethics & Conduct for Business Partners¹ when conducting business on behalf of the Group.

3. POLICY COMMITMENTS

No Child Labour

The Group strictly prohibits the employment of individuals under the age of 18 in any capacity.

No Forced, Bonded or Involuntary Labour

All employment must be freely chosen. The Group does not permit forced, bonded or involuntary labour. Employees shall not be required to surrender identity documents or bear recruitment fees.

¹ Downloadable from www.luxchem.com.my

No Discrimination and Equal Opportunity

The Group does not tolerate discrimination based on race, gender, age, religion, disability, ethnicity, marital status, sexual orientation, nationality, union affiliation, or political opinion. Employment decisions are solely based on merit and qualifications.

Freedom of Association

The Group respects employees' rights to join or form trade unions.

Fair Labour Practices

The Group is committed to ensuring fair and reasonable labour practices across all its workplaces.

Workplace Safety and Health

The Group is dedicated to providing a safe and healthy working environment, in compliance with all relevant safety and health laws and regulations.

Workplace Security and Harassment Prevention

The Group prohibits all forms of harassment and abuse in the workplace, including physical, verbal, visual and psychological misconduct. Any such behaviour, regardless of its nature or severity, is not tolerated. All reports of harassment or abuse will be treated with strict confidentiality and investigated promptly, fairly and impartially.

Fair Wages, Working Hours and Benefits

The Group commits fully with applicable laws regarding minimum and fair wages, work hours, overtime and employee benefits. Employees are compensated competitively and provided with benefits that are aligned with market and industry standards.

Privacy and Data protection

The Group respects and safeguards personal data in accordance with applicable data protection laws. Employees' rights to privacy are appropriately protected.

4. REPORTING OF HUMAN RIGHTS VIOLATION AND GRIEVANCE MECHANISM

The Group provides accessible grievance channels and whistleblower protection. All reports will be investigated fairly, and appropriate remedial action will be taken.

Reports may be directed to:

whistleblower@crowe.my Head of Internal Auditor
--

Alternatively, reports may be submitted through the grievance procedures outlined in the Employee Handbook. For further guidance, employees may contact the Human Resources & Administration Department.

5. HUMAN RIGHTS DUE DILIGENCE

The Group is committed to progressively implementing a due diligence process to identify, assess, and mitigate human rights risks across its operations. This includes integrating findings into decision-making and monitoring effectiveness.

6. TRAINING AND AWARENESS

The Group is committed to progressively incorporating human rights topics into employee training programmes and enhancing awareness throughout the Group and its value chain.

7. GOVERNANCE, ROLES & RESPONSIBILITIES

The Board of Directors holds ultimate oversight of this Policy. The Sustainability Committee and Human Resources & Administration Department are responsible for monitoring its implementation and ensuring compliance.

8. POLICY REVIEW

The Policy will be reviewed periodically to ensure its continued adequacy and relevance. Human rights performance is disclosed in the Group's annual Sustainability Statement.

This Policy has been reviewed and approved as Version 3 by the Board of Directors of Luxchem Corporation Berhad on 23/10/2025. Version 3 supersedes all previous versions.

Version 1 - 08/2018

Version 2 - 07/2023

Version 3 - 10/2025

/ee