

SKP RESOURCES BERHAD

Sexual Harassment Prevention Policy

POLICY

Document Title:	Sexual Harassment Prevention Policy		
Ref No:	SKPRES/CHRA-P03		
Originator:	CHRA	Applicable To:	SKP Resources Berhad and its subsidiaries
Revision No:	New	Effective Date:	26 August 2025

1. Objective

The objective of Sexual Harassment Prevention Policy is to ensure that sexual harassment does not occur within SKP Resources Berhad ("SKP") and its subsidiaries (collectively known as "the Group") and, if it does occur, to ensure that adequate measures are available to deal with the problem and prevent its recurrence.

2. Policy Statement

- a) The Group recognizes that sexual harassment at work, which is harmful to the employees as well as the management, is an unacceptable discriminatory practice, and is committed to its eradication.
- b) It is the policy of the Group to provide a working environment where all employees can work without the distress and interference of sexual harassment as defined and prohibited by federal, state and syariah statutes.
- c) Sexual harassment is a disciplinary offence. The Group stands firm against all forms of sexual harassment and any employee found to have committed the offence would be severely disciplined, which shall include dismissal.
- d) All employees should observe a desirable standard of conduct, which would prevent the occurrence of sexual harassment in the workplace. Incidents of sexual harassment should be reported in accordance with the prescribed procedure without any delay.
- e) All Supervisors, Executives and Managers of the Group are responsible for implementing Sexual Harassment Prevention Policy and to demonstrate leadership by example.

3. Definition and Scope

- a) Sexual harassment shall mean any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological, or physical harassment:
 - that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on her/his employment or her/his employment-related benefits.

OR

 - that might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to her/his well-being, but has no direct link to her/his employment or employment-related benefits.

- b) Based on the definition in Clause 3a) above, sexual harassment may be divided into two categories below:
- i. Sexual coercion is sexual harassment that results in some direct consequence to the victim's employment. An example of sexual harassment of this coercive kind is where a superior, who has the power over salary and promotion attempts to coerce a subordinate to grant sexual favors. If the subordinate accedes to the superior's sexual solicitation, job benefits will follow. Conversely, if the subordinate refuses, job benefits are denied.
 - ii. Sexual annoyance is sexually-related conduct that is offensive, hostile, or intimidating to the recipient, but nonetheless has no direct link to any job benefit. However, the annoying conduct creates a bothersome working environment which the recipient has to tolerate in order to continue working. A sexual harassment by an employee against a co-employee fall into this category. Similarly, harassment by the Group's client against an employee also falls into this category.
- c) Sexual harassment in the workplace includes any employment-related sexual harassment occurring outside the workplace as a result of employment responsibilities or employment relationships. Situations under which such employment-related sexual harassment may take place include, but is not limited to:
- at work-related social functions;
 - in the course of work assignments outside the workplace;
 - at work-related conferences or training sessions;
 - during work-related travel;
 - over the phone; and
 - through electronic media.
- d) Sexual harassment encompasses various conducts of a sexual nature, including:
- i. Verbal harassment, e.g. offensive or suggestive remarks, comments, jokes, jesting, kidding, sound, questioning.
 - ii. Non-verbal / gestural harassment, e.g. leering or ogling with suggestive overtones, licking lips or holding or eating food provocatively, hand signal or sign language denoting sexual activity, persistent flirting.
 - iii. Visual harassment, e.g. showing pornographic materials, drawing sex-based sketches or writing sex-based letters, sexual exposure.
 - iv. Psychological harassment, e.g. repeated unwanted social invitations, relentless proposal for dates or physical intimacy.
 - v. Physical harassment, e.g. inappropriate touching, patting, pinching, stroking, brushing up against the body, hugging, kissing, fondling, sexual assault.
- e) It is essential to emphasize that sexual harassment refers to sexual conduct which is unwanted and unwelcome to the recipient. It is also a sexual conduct which is imposed on and unsolicited or unreciprocated by the recipient. This is the key factor that distinguishes sexual harassment from friendly flirtations or other relations of a sexual nature, which are freely and mutually entered into.
- f) The Group recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

- g) Anyone, including all employees of the Group, clients, customers, casual workers, contractors, or visitors who sexually harasses another will be reprimanded in accordance with Sexual Harassment Prevention Policy.

4. Grievance Procedures

- a) Victim of sexual harassment should submit such complaint to the Human Resource Department within 48 hours from the date of occurrence. If the complaint is against any of the employees from the Human Resource Department, such matter shall be referred to the General Manager / Head of relevant subsidiary / subsidiaries. (if the complaint is against the General Manager, such matter shall be referred to the Vice President / Director).
- b) The Group upon receipt of the complaint, shall investigate the matter thoroughly and endeavor to take the appropriate action within two (2) weeks from the date the complaint was received. The investigation shall cover obtaining the statement of the victim, statement of the witnesses, if any; physical evidence, e.g. bruises and injuries and the statement of the perpetrator and witnesses, if any.
- c) If the findings of the investigation reveal that allegation is proven, then disciplinary process shall take place, which may include conducting a domestic inquiry.
- d) The victim shall be informed in writing of the progress of the investigation or the solution, if it is resolved. Should the victim find the outcome of the investigation or the solution not satisfactory, he/she may appeal in writing to the General Manager / Vice President / Director.
- e) The relevant authority shall, after reviewing the case, make a decision to either uphold the earlier decision or provide an alternative solution. The decision of the relevant authority shall be final and shall be relayed to the victim in writing.

5. Punishment

- a) The harasser will be liable for the following disciplinary actions if the offence of sexual harassment is committed. The nature and type of penalty should depend upon the severity of the offence.
 - i. Summary dismissal
 - ii. Final Written Warning with deferment of salary increment and/or bonus not exceeding one year
- b) On the other hand, to defer false and fabricated accusation against any person, disciplinary action can be taken penalties against those who make such accusations.

6. Protective and remedial measures for the victim

- a) The Group shall maintain confidentiality of any complaints or report made by the victim as well as the details of the investigations to the fullest extent possible, so as to minimize embarrassment to the victim.
- b) Throughout the grievance procedure, the victim is entitled to be helped by a counsellor or a nominee within the Group whom is capable to assist the victim.
- c) The Group shall ensure that the victim knows that they can lodge the complaint outside of the Group through the relevant authority or legal framework and understand the need to support the victim in making such complaints.

- d) In a case where the victim of sexual harassment has suffered a loss, such as a demotion or a denial of a promotion, it is appropriate to restore such person to his or her proper position on the job. The victim should also be compensated for any monetary loss arising out of a denial of employment-related benefits which were rightfully due to him or her.
- e) Where the complaint is found to be unjustified and baseless, appropriate remedy should be granted to the accused employee if there has been any loss suffered by him/her.

7. Communication and Training

- a) All employees must be briefed on the content of Sexual Harassment Prevention Policy as part of their induction into the Group and subsequently be refreshed by attending yearly refresher training.
- b) In addition to the need for communication to the employees, the Group should ensure that every Departmental Head recognizes the potential problems of sexual harassments and capable to deal with them as and when they arise.