

Human Rights Policy & Statement

Introduction

Noble GA is dedicated to the values and standards of business and ethical behavior that comply with all applicable laws and regulations and includes company policies, practices and procedures. Noble GA respects internationally recognized Human Rights as established in the Universal Declaration on Human Rights and the International Labor Organization's Core Conventions. This policy applies to the entities that we own and the facilities that we manage. We expect our business partners, including suppliers, to adopt and adhere to similar values and practices.

We are committed to avoiding adverse human rights impacts and complexities resulting from or caused by our business activities; we have incorporated due diligence that is aligned with the UN Guiding Principles on Business and Human Rights. We seek to insert human rights considerations in all of our global business operations, products, services and supply chain. Noble GA will continue to find ways to promote and enhance human rights within its scope of influence.

Definition

Human Rights

According to the UN, Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

Objectives

The objective of Noble GA's policies is to provide an overview of expectations for employees and business partners. The Human Rights policy exists to:

- a) Inform employees, business partners and customers of Noble GA's commitment to human rights.
- b) Establish Noble GA's commitment to showing its respect for human rights through on-going human rights due diligence.
- c) Maintain Noble GA's high ethical standards in accordance with the organization's core values.
- d) Contribute to the realization of human rights globally.

Diversity and Inclusion

We value and enhance the diversity and inclusion of the people with whom we work, regardless of they be local or foreign employees. We are devoted to equal opportunity and do not tolerate discrimination or harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company are justified through qualifications, performance, skills and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

Responsibilities to be taken by Business, both Employees & Leaders to encourage diversity and inclusion in the workplace:

Employees:

- a) Understand what inclusion and diversity means
- b) Get to know one another
- c) Be fair and respectful
- d) Invite and value each person's unique contribution
- e) Make the most of differences, similarities and shared goals.

Leaders:

- a) Understand what inclusion and diversity means
- b) Deeply know each of your team members
- c) Value and harness individual strengths and difference
- d) Proactively seek out different perspectives when making decisions
- e) Challenge bias and inappropriate behavior
- f) Role model inclusion
- g) Maximize team diversity - to support Innovation
- h) Create an environment that helps people give—and be—their best.

Freedom of Association

The Company is committed to providing freedom of association for all our employees in line with the International Labor Organization (ILO) Core Conventions.

- a) The Company respect freedom of association and collective bargaining as part of our commitment to support the fair and equitable treatment of our Employees. The Company will not refuse any genuine opportunity to collectively bargain with Employees who want to do so.
- b) Employees, without distinction, have the right to join or form trade unions of their own choosing without prior authorization, and to bargain collectively. The Company will refrain from any activity that is likely to discourage Employees from exercising their union rights. Any union membership/activity will not lead to disciplinary measures or punitive actions.
- c) Trade unions have access to The Company premises, and The Company will not interfere with the organizing of activities of Employees, Employees representatives, or representatives of trade unions. Employees representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- d) The freedom of association shall be instituted according to and within the Trade Union Act 1959, Industrial Relations Act 1967 and Immigration Act 1956/63 of Malaysia. Where the right to freedom of association and collective bargaining are restricted under the law, The Company will allow its Employees to choose their representatives freely.
- e) The purpose of this policy is to ensure that

Employees of The Company are provided with an environment which is free from unlawful discrimination, harassment or victimization and that we are implementing the Company's commitment to equal opportunities, freedom of association and collective bargaining at all times. The management, supervisors and individuals of The Company, professionally involved in administration activities, undertakes the responsibility for implementing this Freedom of Association Policy.

Forced Labor, Human Trafficking and Child Labor

We do not use any form of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. Noble GA also prohibits all forms of exploitation of children.

Child labor, as defined by the International Labor Organization (ILO) Convention is "work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under of age of 18 that is hazardous to the physical or mental health of the child. Refer to "*Modern Slavery policy*" for more details.

Work Hours, Wages and Benefits

Noble GA upholds to its core values in human capital, by complying to all laws and regulations regarding pay practices and the classification of employment according to job level and status. The Company shall comply with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 4 hours per day, with the relevant periods of rest similarly observed.

The Company shall comply with national laws and regulations with regard to wages and benefits. All work-related activities are carried out on the basis of a recognized employment relationship established according to national law and practice. All members of staff are remunerated in a way which is in accordance with the national minimum wage in Malaysia or the country of employment as is appropriate. Refer to our "*Labor Standards policy*" for more details.

Safe, Healthy & Working Conditions in the Workplace, including Foreign Worker Welfare

We seek to ensure that all employees including foreign workers, work in a safe and healthy environment as well as reasonable conditions and that they are treated with dignity and respect. We work to take effective steps to prevent potential accidents and injuries to employee's health by minimizing, so far as is reasonably practicable, and in cooperation with its employees, workers and other members of staff, the causes of hazards inherent in the workplace. All employees will receive safety and job specific health and safety instructions during the course of their employment with the Company. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing the Health and Safety element of this policy is assigned to the Group Human Resources Department. The use of misleading or fraudulent practices during recruitment of employees is not tolerated and charging recruitment fees to the employee is prohibited, especially to foreign workers. All workers have access to personal documentation and passports.

Women Rights & Empowerment

Many women face discrimination and disadvantage, lack access to skills and training, and face roadblocks to their active participation in the economy. They often lack the protection of basic rights and laws. Poverty, discrimination and violence against women are major barriers to opportunity.

Women are integral to our business model and growth ambitions. We seek to manage and grow socially responsible businesses where women participate on an equal basis. We believe that women's rights and economic inclusion are priorities to win long-term.

Our approach starts with the respect of the rights of women and extends to their promotion as well as helping to develop skills and open up opportunities, both in our own operations and our value chain.

Addressing Human Rights Impacts

We recognize that we must take steps to identify and address any actual or potential adverse impacts with which we may be involved directly or indirectly through our own activities or our business relationships. We manage these risks by integrating the responses to our due diligence into our policies and internal systems,

acting on the findings, tracking our actions, and communicating with our stakeholders about how we address impacts.

We understand that human rights due diligence is an ongoing process that requires specific attention at certain stages in our business activities, such as when we form new partnerships or our operating conditions changes, as these changes may create new potential or actual impacts on human rights.

We understand that there are particularly high risks of human rights abuses, in other countries that we operate. Hence, we place additional due diligence to assess these risks and address them effectively, where appropriate, using our leverage to work either in one-to-one relationships or in broad-based partnerships.

We acknowledge the importance of communicating with our employees, workers and external stakeholders who are or could potentially be affected by our actions. We pay high attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or unfortunate circumstances and recognize that women and men may face different risks.

Remedy

We place high importance on creating open and honest communications among all employees and implement effective remedy wherever human rights impacts occur through company-based grievance mechanisms. We continue to build the awareness and knowledge of our employees and workers on human rights, including labor rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels. One of the grievance channels, whereby, employees can submit their grievances through the Human Resources Department. They can also submit their grievances and remain anonymous at the same time via alternative channels provided (email, website, hotline). Employees will not have any form of retaliation action taken against them for doing so. All grievances submitted will remain confidential.

We also ensure employees are aware of the Human Rights Policy through training and annual certification process. The Company supports worker committees where grievances can be expressed freely among the

employees. We also promote the provision of effective grievance mechanisms by our suppliers. For further details on effective grievance mechanisms can be found in our *"Supplier Code of Conduct"*. Any concerns are addressed using a robust internal process, and we regularly update our policies and practices based on our findings.

In Conclusion

Our vision is to continuously build an organization that responds to changing views of sexual health and develop products that inspire people to make better and healthier choices. We champion social responsibility and sustainability, not just as moral imperatives but to build better, stronger relationships within our communities.

We constantly evaluate and review how best to strengthen our approach to addressing human rights, including labor rights. We believe that working through external initiatives and partnerships, for example with other industry, NGO, trade union, supplier and other business partners, is often the best way to address shared challenges.

We will track and publicly report on progress on an annual basis.

This Human Rights Policy Statement consolidates our existing commitments and brings increased clarity on our processes and procedures. Its principles are implemented across our operations and value chain.

NOBLE GA reserves the right to amend this policy from time to time.



Mohd Sani Akmar bin Abdul Ghafar

Managing Director

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