



Child Labour & Forced Labour Policy



1. INTRODUCTION

Stella Holdings Berhad and its subsidiaries are conscious of its corporate social responsibility towards the communities in which it operates and is endeavoured to play its contributing roles in the eradication of child labour and forced labour.

2. POLICY STATEMENT

Stella Holdings Berhad does not tolerate both child labour and forced labour (as defined in Section 4 below) in any of its activities, including those in its supply-chain, and shall comply with local laws for employment involving children and youths.

3. POLICY OBJECTIVES

This Child Labour & Forced Labour Policy ("Policy") provides the principle and guidelines against child labour and forced labour which shall be incorporated into the processes and decision-making of the Group and relevant parties within the scope of this Policy. This Policy also outlines the framework for addressing child labour and forced labour.

4. SCOPE

This Policy applies to the Group, and:

- a) Third parties involved in the supply-chains of the Group. They include the customers, vendors, contractors, agent financiers and other service providers.
- b) Recipients of financial and non-financial aids, sponsorships, donations etc. from the Group. They include non-profit organisations, charitable organisations, educational institutions etc.



5. REFERENCES

- a) The ILO Convention on Forced Labour, 1930 (No. 29).
- b) ILO Convention concerning Minimum Age for Admission to Employment, 1973 (No. 138)
- c) ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999 (No. 182)
- d) Article 6 of the Federal Constitution of Malaysia.
- e) Anti-Trafficking in Persons and Anti-Smuggling of Migrants Act 2007.
- f) Passport Act, 1966.
- g) Employment Act, 1955.
- h) Children and Young Persons (Employment) Act, 1966.
- i) Occupational Health and Safety Act, 1994.
- j) Group's Code of Ethics and Conduct (available on the Company's Official Corporate Website at www.stella-holdings.com.my)
- k) Group's Whistleblowing Policy (available on the Company's Official Corporate Website at www.stella-holdings.com.my)
- l) Stella Holdings Berhad Group Human Resources Policy.

6. DEFINITIONS

"Child" means anyone below 18 years of age according to ILO.

"Child Labour" means work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring



7. ROLES AND RESPONSIBILITIES

Body/Function/Individuals	Roles and Responsibilities
Board of Directors	<ul style="list-style-type: none"> ○ Overall oversight of initiatives against child labour and forced labour. ○ Child Labour & Forced Labour Policy approval and subsequent reviews.
Group Chief Executive Officer, Chief Executive Officers, Directors and Senior Management	<ul style="list-style-type: none"> ○ Ensuring that this policy is implemented and adhered to, and that all employees, third parties and business partners are made aware of the policy and its requirements. ○ Periodic sign-off on compliance with the policy.
Management at all levels	<ul style="list-style-type: none"> ○ Responsible for carrying out training, monitoring and other activities to assist in ensuring effective implementation of and compliance with this Policy.
GHRAD	<ul style="list-style-type: none"> ○ Plan, organise and roll out communication & training within the Group in respect of this Policy and requirements. ○ Disciplinary actions against violations of this Policy.
All employees	<ul style="list-style-type: none"> ○ Raise concern of any actual or suspected violation of this Policy to either the GHRAD, the CFO, the Group Chief Executive Officer or the Chairman of the Audit Committee, through establish channels.



8. POLICIES AND PROCEDURES

8.1 PROHIBITION

Stella Holdings Berhad prohibits any activities that involve or support child labour and forced labour in the Group. However, any employment involving children and youths shall comply with the Children and Young Persons (Employment) Act, 1966.

8.2 PREVENTIVE MEASURES

Reliably verifying the age of employment candidates is mandated in the hiring process in Stella Holdings Berhad. A copy of any identification documents replied upon for age verification must be retained throughout the period of employment.

8.3 DEALING WITH THIRD PARTIES/BUSINESS PARTNERS ETC.

All external parties having business dealings or service engagements with Stella Holdings Berhad are expected to be free of child labour and forced labour in their activities. Stella Holdings Berhad reserves the right to terminate business relationship with any party found to have engaged or promoting child labour and forced labour and failed to rectify them within reasonable time from date of discovery.

8.4 REPORTING AND DEALING WITH VIOLATIONS

Any employee of Stella Holdings Berhad or member of the public may report cases of actual or suspected violation to:

- a) Human Resources & Administration Manager
(azahan@stella-holdings.com.my or normadihah@stella-holdings.com.my)
- b) Group Chief Executive Officer
(ng.jun.lip@stella-holdings.com.my)

9. ADMINISTRATION

The Group Human Resources & Administration Department is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed by the Board at least once every 2 years.