



DXN HOLDINGS BHD.

Registration No.: 199501033918 (363120-V)

HUMAN RIGHTS POLICY

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1. DEFINITION

For the purpose of this Policy, the following definitions and interpretations shall be apply in this Policy :-

Associates	<p>An external party with whom the Group has established, or plans to establish some form of business relationship. This includes vendor, suppliers, contractors, sub-contractors, consultants, agents, outsourcing providers, representatives and other intermediaries who are performing work or services for or on behalf of the Group.</p> <p>Associate (in relation to a person) is defined in the MACC Act to mean the following: -</p> <ul style="list-style-type: none">(a) any person who is a nominee or an employee of such person;(b) any person who manages the affairs of such person;(c) any organisation of which such person, or any nominee of his, is a partner, or a person in charge or in control of, or has a controlling interest in, its business or affairs;(d) any corporation within the meaning of but not limited to the Companies Act 2016 [Act 777], of which such person, or any nominee of his, is a director or is in charge or in control of its business or affairs, or in which such person, alone or together with any nominee of his, has or have a controlling interest, or shares to the total value of not less than thirty per centum of the total issued capital of the corporation; or(e) the trustee of any trust, where:-<ul style="list-style-type: none">(i) the trust has been created by such person; or(ii) the total value of the assets contributed by such person to the trust at any time, whether before or after the creation of the trust, amounts, at any time, to not less than twenty per centum of the total value of the assets of the trust. <p>Notwithstanding the above definitions, DXN distributors are independent distributors and the relationship between DXN and its independent distributors shall in no way fall within above definition of Associates.</p>
Board	Board of Directors of DXN
Company or DXN	DXN Holdings Bhd.
Directors	Directors of DXN including independent and non-independent directors and executive and non-executive directors.



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Employees	All individuals directly employed by DXN whether on permanent, contractual or temporary basis.
GFD	Group Finance Department of DXN
GGRM	Group Governance and Risk Management department of DXN
GHR	Group Human Resources of DXN
Group or DXN Group	DXN and subsidiaries, collectively
KSM	Key Senior Management of DXN. A person, who in the opinion of DXN, is one who generally holds highest level of management responsibility and decision-making authority within the Group and must include a person who is primarily responsible for the business operations of the Company's core business and principal subsidiaries. Essentially, KSM is a member of the C-Suite or persons as identified as KSM
Operational area PIC	Refers to the head of the operational area allocated responsibility for ensuring compliance with a specific obligation.
BRC	Board Risk Committee of DXN
Third Parties	Any individuals or organisation that an associate may come into contact with during engagement with DXN and includes actual and potential clients, customers, suppliers, vendors, business contacts, agents, advisors, government and public bodies including their advisors, representative and officials.



2. INTRODUCTION

- 2.1 Our mission at DXN Group is to create a good positive and diverse community and we believe our people and community have the right to be treated equally with respect and dignity. To achieve this mission, we are committed to constantly drive and uphold human rights principles throughout our business and operations.
- 2.2 Via this policy, DXN will consistently create awareness and self-consciousness amongst our people and community. Thus, we have developed this Human Rights Policy (hereinafter referred to as 'the Policy') to uphold the support to human rights standards in DXN.

3. APPLICATION

- 3.1 This Policy applies to DXN's Board of Directors (Executive or Non-Executive) and all employees regardless of their positions or grade including permanent and contractual employees of the Group.
- 3.2 This Policy is also applicable to DXN's external stakeholders including members, distributors, vendors, contractors, sub-contractors, suppliers, customers, clients, consultants, governments, and local communities who contribute to DXN's business and supply chain.

4. ROLES AND RESPONSIBILITIES

- 4.1 This Policy aims to eliminate non-discrimination and uphold human rights principles into our objectives and targets among our human capital and stakeholders.
- 4.2 While all employees should adhere to the policy's obligations relevant to their position, certain individuals and groups have specific responsibilities that they are expected to undertake with respect to this Policy. These key responsibilities are outlined below:

Role	Descriptions
Top Management (Board of Directors/ Head of Departments/ Managers)	<ul style="list-style-type: none">• Role model to create an appropriate behavior;• Promote and educate employees on the policy;• Instant response to any inappropriate behavior or breach of the policy;• Response by taking corrective action to any grievance raised by employees or other personnel;• Ensure fairness to both parties during the investigation or



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	<p>solving an issue.</p> <ul style="list-style-type: none"> • Take appropriate disciplinary actions on any breach of policy to the suspected violator.
Group Human Resources (“GHR”) Department	<ul style="list-style-type: none"> • Overall responsible for the Policy implementation in the DXN Group related to the implementation, procedures, guidance and direction and reporting; • Set up systems to monitor compliance with the Policy across the Group and perform continuous assessments to identify potential human rights risks and conduct necessary corrective actions; • Addressing violations and grievances by establishing clear, accessible and confidential channels for reporting human rights violations. This includes the due diligence process and taking appropriate disciplinary or corrective actions against those responsible for violations; • Organise and create awareness of the Policy to our internal and external stakeholders via activities such as training, seminars, campaigns, etc.; • Periodically oversee the adequacy and effectiveness of the current policy.
Employees	<ul style="list-style-type: none"> • Read, understand and comply with the policy; • Treat and respect other employees with dignity, respect, courtesy and fairness

5. SCOPE

5.1 Forced Labour and Modern Slavery

DXN Group shall not condone any form of forced labour or modern slavery throughout our business and operations. The forms of prohibition indicators are aligned with the Federal Constitution, the UN Declaration on Human Rights, and the ILO Decent Work Agenda:

- a) Abuse of vulnerability;
- b) Deception;
- c) Restriction of movement;
- d) Isolation;
- e) Physical and sexual violence;
- f) Intimidation and threats;
- g) Retention of identity documents;
- h) Withholding of wages;
- i) Debt bondage;



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- j) Abusive working and living conditions;
- k) Involuntary or excessive overtime.

5.2 Diversity and Equal Opportunity

DXN Group does not tolerate any form of discrimination in recruitment and selection, compensation and benefits, professional development and training, promotion, termination or retirement based on personal characteristics such as gender identity, age, race, sexual orientation or disability, ethnicity, and national origin, socio-economic background or religious belief.

5.3 Anti-Bribery and Corruption

DXN Group adopts zero tolerance on all forms of bribery and corruption in all its forms within the operations. We are committed to conducting business ethically and in full compliance with relevant laws and shall continue to uphold our anti-bribery and corruption principles throughout our business and operations.

**Refer to DXN's Anti-Bribery and Corruption Policy at <https://www.dxn2u.com>*

5.4 Child Labour

DXN Group strictly prohibits the use of child labour in any form. We are committed to upholding all relevant laws and regulations regarding the minimum age for employment, ensuring that no individual below the legal working age is employed.

5.5 Freedom of Association and Collective Bargaining

DXN Group respects the rights of employees to form or join trade unions of their choice and to bargain collectively.

5.6 Occupational Health and Safety

DXN Group is continuously promoting a safe and healthy working environment in our business and operations by taking adequate steps to prevent and eliminate accidents and injury to health arising out of the course of work by minimising the causes of hazards inherent in the working environment in accordance to our Occupational Safety and Health Policy.



5.7 Workplace Security and Conducive Working Environment

DXN Group is committed to ensuring our workplaces are free from any form of violence, bullying, intimidation, harassment and other forms due to any threats from our internal and external personnel. DXN shall provide a good work condition and environment that may promote productivity, work-life balance, harmony, and employee well-being. To eliminate any forms of violence, bullying, intimidation, and harassment in our working culture, we have developed our Sexual Harassment Policy for further guidelines.

5.8 Compensation and Working Hours

DXN Group shall compensate our employees' wages and meet or exceed the legal or industry minimum standards by applicable laws and regulations (both local and overseas). DXN also shall provide equitable benefits to our employees including appropriate length of working hours, rest periods, leaves and overtime.

5.9 Privacy and Data Protection

DXN Group respects the confidential personal data of the employees and treats all personal data with integrity. We comply with the data protection laws (PDPA Act) and ensure that personal information is collected, processed, and stored securely. Access to personal data is restricted to authorised personnel only, any misuse or unauthorised disclosure is strictly prohibited.

6. IMPLEMENTATION AND PROCEDURES

6.1 Human Rights Due Diligence

DXN Group shall integrate human rights due diligence into its risk management processes which include but are not limited to:

- Identifying human rights risks in its operations and supply chain;
- Assessing the potential and actual impact of its activities on human rights;
- Preventing, mitigating, and remedying human rights violations;
- Monitoring the effectiveness of our actions and adapting our policies accordingly.

6.2 Grievance Mechanisms and Remediations

DXN Group shall provide a reporting channel for individuals to report human rights concerns which includes a formal whistleblowing process that ensures confidentiality and non-retaliation. DXN Group shall commit to addressing human rights complaints in a timely and transparent manner. Where violations occur, we take appropriate steps to provide remediation, which may include restitution, compensation, or other corrective measures.



**Refer to DXN's Whistleblowing Policy at <https://www.dxn2u.com>*

6.3 Stakeholder Engagement

DXN Group shall maintain open channels of communication with stakeholders, including employees, communities, civil society organisations, investors, and regulators, to ensure that human rights concerns are promptly addressed, including grievance mechanisms, and to ensure stakeholders can raise issues freely and confidentially. Feedback from these engagements helps DXN Group to improve its human rights practices and guide its decisions to minimise harm and promote respect for human rights across our business activities.

6.4 Training and Capacity Building

DXN Group shall commit to building awareness and understanding of human rights among our internal and external stakeholders, including human rights principles, ethical labor practices, and human rights risks in operations. This ensures that its stakeholders are equipped with the knowledge and skills needed to uphold and promote human rights in their daily activities.

6.5 Continuous Improvement and Policy Review

This Human Rights Policy will be reviewed periodically and updated to reflect changes in international standards, legal requirements, and best practices. DXN Group is committed to continuously improving its human rights practices and integrating new insights into our business operations.

7. DISCLOSURE

7.1 Reporting and disclosure will be included in a sustainability reporting, corporate governance report and corporate governance overview statement of DXN's Annual Report. These reporting may include a summary of this Policy, a narrative on the opportunities and the progress of implementation of various sustainability initiatives towards achieving the Group's sustainability objectives.



8. POLICY GOVERNANCE

- 8.1 Any requirement for modifications and/or amendments shall be deliberated and any recommendation for revision shall be highlighted by the Executive Committee to the Board for approval.
- 8.2 This Policy shall be reviewed as and when necessary, in accordance with the needs of the Group by the Board in association with the Executive Committee and shall thereafter be shared with the stakeholders through the corporate website and other channels as appropriate.

9. KEY CONTACTS

- 9.1 The following are key contacts in respect of this Policy:
- Manager, Group Human Resources Department
- 9.2 If you have any concerns regarding specific breaches of this Policy, you can contact the above, or refer to the process for raising concerns regarding unethical business conduct, as set out in the Code of Conduct and Ethics and Whistleblowing Policy.

10. REFERENCES

- a) International Labour Organisation's (ILO) Convention on Labour Standards
- b) International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work
- c) United Nations (UN) Universal Declaration of Human Rights
- d) Applicable local and ratified international laws and regulations