KEYFIELD INTERNATIONAL BERHAD

Registration No. 202001038989 (1395310-M)
(Incorporated in Malaysia)

HUMAN RIGHTS POLICY

1. INTRODUCTION

At Keyfield International Berhad and its group of subsidiaries ("Keyfield" or "the Group"), we are committed to upholding the highest standards of human rights in all our operations, complying with our Code of Conduct and Business Ethics, and all relevant legal requirements. This policy outlines our commitment to ensuring that all employees are treated with dignity and respect, and that our business practices do not infringe on the rights of individuals. We strive to provide a safe and sustainable working environment with the right practices implemented grounded on principles of accountability, integrity, openness, respect for human rights and interests of employees at the workplace.

2. OBJECTIVES

Keyfield's sustainability principles are guided by the commitment:

i. To promote and protect the human rights of all employees.

ii. To ensure compliance with Malaysian laws and international human rights standards, such as UN's Guiding Principles on Business and Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

iii. To create a safe, inclusive, and equitable workplace.

iv. To prevent and address any form of human rights violations within our operations and mitigate risk associated with supply chain.

3. SCOPE

This policy applies to Keyfield Group of Companies and all its employees. Keyfield also expects its business associates, such as suppliers, contractors and business partners etc, to adhere to this policy.

4. PROCEDURES

i. Child Labour

- We strictly prohibit the use of child labour in any part of our operations.
- We comply with the Malaysian Employment Act 1955, which sets the minimum age for employment. We only hire personnel aged 18 years and above.

ii. Forced Labour

- We do not engage in or support the use of forced or compulsory labour or engage in bonded labour/ debt slavery.
- All work must be voluntary, and employees are free to leave their employment after reasonable notice.

iii. Discrimination

- We are committed to providing a workplace free from discrimination based on race, gender, age, religion, disability, or marital status in hiring and implementation of employment practices such as salary review, promotion, reward and access to training.
- We adhere to the Employment Act 1955.

iv. Freedom of Association

- Employees have the right to form and join trade unions of their choice without fear of intimidation or reprisal.
- We respect the rights of employees to engage in collective bargaining.

v. Equal Employment Opportunity

- We provide equal employment opportunities to all employees and applicants.
- Decisions regarding hiring, promotion, and compensation are based on merit, qualifications, and business needs.

vi. Compensation

- We ensure that all employees receive fair wages that meet or exceed the minimum wage requirements set by Malaysian law.
- Compensation practices are transparent and comply with the Employment Act 1955.
- An employee is defined as a staff registered in the payroll of Keyfield with the relevant statutory contributions such as EPF, EIS and schedular tax deductions (if applicable) effected. The employee may be permanent, contract or part-time.

vii. Working Hours

- We comply with Malaysian laws regarding working hours, rest periods, and overtime. The Group will adhere to the Employment Act and/ or the Maritime Labour Convention (MLC) regarding working hours and overtime, where applicable.
- Employees are entitled to adequate rest and leisure time.

viii. Grievance Procedure

- It is the Company's policy to settle any grievances at the lowest possible level. However, in the event that no settlement can be reached, an employee may raise his/ her grievance through formal procedures i.e. Whistleblowing channel at https://keyfieldoffshore.com/whistle-blowing/ ; or via email at whistleblowing@keyfieldoffshore.com .

5. IMPLEMENTATION AND MONITORING

- This policy will be communicated to all employees and stakeholders.
- Regular training will be provided to ensure understanding and compliance.
- We will monitor and review our practices to ensure ongoing adherence to this policy.

6. REPORTING AND ACCOUNTABILITY

- Employees are encouraged to report any human rights concerns or violations.
- Reports can be made through our whistle blowing grievance mechanism.
- We will investigate all reports promptly and take appropriate action.

7. REFERENCES:

i. Employment Act 1955
ii. Maritime Labour Convention
iii. International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
iv. United Nations Universal Declaration of Human Rights
v. United Nations Guiding Principles on Business and Human Rights
vi. Keyfield Code of Conduct and Business Ethics Policy
vii. Keyfield Board Diversity Policy
viii. Keyfield Anti-Bribery and Corruption Policy
ix. Keyfield Whistleblowing Policy

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