

Date: 1 October 2019

CHILD AND FORCED LABOUR POLICY

1. POLICY

CWG Holdings Berhad ("the Company") and its subsidiaries ("CWG Group") do not employ any person below the 18 years of age at its workplace facilities and the age is substantiated by the person's Malaysian national registration identity card.

CWG Group explicitly prohibits the use of forced or compulsory labour in its premises. No employees is made to work against his/her will or work as bonded/forced labour, or subject to corporal punishment or coercion of any type related to work.

No employee of CWG Group may hire child or forced labour on behalf of CWG Group.

2. DEFINITIONS

- 2.1 Child Labour is defined as any persons under the age of 16.
- 2.2 Young Persons is defined as any persons between the age of 16 to 18 years.
- 2.3 Persons allowed to be employed in CWG Group shall be those from the age of 18 years & above at the point of employment.
- 2.4 16 years of age is set by the current national Legislation which states 16 years as the minimum to engage in any business organization.
- 2.5 The Company will nonetheless ensure that it maintains a stricter definition of Child Labour by only employing candidates of 18 years & above.
- 2.6 Age is calculated based on the persons National Registration Identity Card (NRIC) or Passport showing the age of the person against the day of hiring.

3. PROHIBITIONS

It shall be an absolute prohibition by the management of CWG Group to hire any person(s) under the age of 18 years. All Production Control Executives/Managers and HR Managers, engaged for the hiring of new employees into CWG Group shall STRICTLY not hire any persons below this age.

4. PREVENTION & REMEDIATION

4.1 Procedures for Hiring Employees to ensure Age

All employees hired for CWG Group are required to comply with the following set procedures in determining the age and suitability of hiring, in relation to Children & Young Persons into the Company.

- 4.1.1 Upon conducting any interview, the hiring manager and the HR Executive will view the NRIC of the potential employee to ensure that the employee is aged 18 and above.
- 4.1.2 Where applicable, the HR Executive will make a photocopy of the NRIC or the Passport and file that into the Personal File. However, the minimum requirement is to view and to state the potential employees NRIC Number into the application form or the appointment letter, thus ensuring that his age is 18 and above.

- 4.1.3 Where it is noted that the applicant is younger than the required limit set in item 3 above, the candidate is to be informed of this restriction and the interview will cease and the candidate shall not be shortlisted nor hired.
- 4.1.4 Should however any person be employed AND who is later found to be below 18 years of age (i.e. Child or Young Person), the management of CWG Group will take the following actions to ensure that the interest of the young person/child is protected:-
 - 4.1.4.1 No Shift Work or any dangerous work is allowed to be provided to the young person. The young person will only be allowed to work during normal office hours, and in a clerical or non-production related tasks.
 - 4.1.4.2 If the young person is found to be working in the Production or assembly area, he will be transferred out of the Production/Assembly area and will be given a safe working area such as Packing or an office related job.
 - 4.1.4.3 Will not be forced to work beyond 4 hours in a stretch without a 30 minutes break, and no longer than 7 hours per day.
 - 4.1.4.4 Explain the legal requirements and restrictions on working ages to the children and assure them that, if they wish, they will be employed when they reach working age.
 - 4.1.4.5 Understand the children's desires and explore the opportunities for them to re-enter education.
 - 4.1.4.6 Ensure that the child has adequate accommodation and living conditions.
 - 4.1.4.7 The parents/guardians of the child will be informed and CWG Group will sponsor the child to complete his basic education and within the stipulations of the Children & Young Persons Act 1966.

5. ADMINISTRATION & IMPLEMENTATION

- 5.1 This policy is publicly available throughout the CWG Group and clearly communicated to all employees in a manner in which it can be understood.
- 5.2 The HR Manager or his designate will manage this policy and ensure that all procedures and practices intended are carried out by the relevant departments.
- 5.3 Where there are areas of responsibility that a certain department fails to comply to, the HR Manager will make a written report of the matter to the Group Managing Director and wait for a decision on the necessary disciplinary action to be taken.
- 5.4 Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at HR Department and are open for verification by any authorized personnel or relevant statutory body.