



# HUMAN RIGHTS POLICY

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For any enquiries or further information regarding this Policy, stakeholders are encouraged to contact the Sustainability Department at [sustainability@solarvest.com](mailto:sustainability@solarvest.com).

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## 1. SOLARVEST HOLDINGS BERHAD HUMAN RIGHTS POLICY

Solarvest Holdings Berhad and/or its affiliates and subsidiaries (hereinafter collectively referred to as "**Solarvest**") recognises the critical importance of respecting and upholding human rights across all aspects of our operations, value chain, and stakeholder relationships. This Human Rights Policy articulates our commitment to respecting internationally recognised human rights principles and to integrate them into our decision-making, operations, and engagement with stakeholders.

This Human Rights Policy ("**Policy**"), read together with Solarvest's Code of Ethics & Conduct, the Anti-Bribery and Corruption Policy and Whistleblowing Policy is established to guide us in identifying, preventing, mitigating, and addressing human rights risks and impacts, particularly those most salient to our sector and business operations.

This policy sets out our approach to upholding human rights, in alignment with international standards and best practices. It is designed to guide our business decisions and behaviours while reinforcing our role in building a sustainable and ethical business environment.

## 2. SCOPE AND RESPONSIBILITIES

### 2.1. This policy applies to;

- a) Solarvest employees and directors;
- b) any family / household members of (a);
- c) agents acting for or on behalf of (a) or (b);
- d) any third parties acting in the interest of or for and on behalf of Solarvest (e.g. vendors and suppliers)

### 2.2. Any person described in para. 2.1 ("**Person**") shall;

- a) uphold this Policy by avoiding conflicts of interest or any actions that may compromise ethical decision-making, particularly in business dealings involving Solarvest and external stakeholders; and
- b) demonstrate good faith, integrity, and responsibility by prioritising ethical conduct in alignment with Solarvest's human rights commitments.

2.3. Any Person who fails to comply with this Policy shall be subject to disciplinary action, up to and including termination, to the extent permissible under applicable law. The Sustainability and Risk Management Committee ("SRMC") shall ensure the enforcement of this Policy. Any Person with knowledge or suspicion of violations of this Policy shall report his concerns to SRMC or to [sustainability@solarvest.com](mailto:sustainability@solarvest.com).

2.4. All employees, directors, and external partners (e.g. vendors, suppliers) shall;

- a) comply with Solarvest Group Code of Ethics & Conduct; and
- b) inform external parties involved in any business dealings with Solarvest that the company practices a "Human Rights Policy" and to

request the external party's understanding for and adherence with this Policy.

### **3. REFERENCE FRAMEWORKS**

We base our understanding of human rights on four key documents:

#### **3.1. International Bill of Human Rights**

3.1.1. The International Bill of Human Rights comprises the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. These core human rights treaties of the United Nations seek to advance fundamental freedoms and to protect the basic human rights of all people.

##### **3.1.2. This includes:**

- The right to life, liberty and security of person;
- The right to freedom from torture and slavery;
- The right to recognition and equality before the law;
- The right to freedom of thought, conscience and religion;
- The right to freedom of peaceful assembly and association;
- The right to property;
- The right to decent work;
- The right to rest and leisure;
- The right to an adequate standard of living.

#### **3.2. UN Guiding Principles of Businesses and Human Rights**

3.2.1. UN Guiding Principles of Businesses and Human Rights ("UNGPs") is a set of guidelines for States and companies to protect and respect human rights. The UNGPs contain three chapters, or pillars: protect, respect and remedy. Each defines concrete, actionable steps for governments and companies to meet their respective duties. For companies, this includes their responsibilities to prevent human rights abuses and provide remedies if such abuses take place.

#### **3.3. International Labour Organisation Conventions**

3.3.1. The International Labour Organisation ("ILO") has identified eight core conventions covering fundamental principles and rights at work. These are part of the framework of human rights:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87);

- Right to Organise and Collective Bargaining Convention, 1949 (No.98);
- Forced Labour Convention, 1930 (No. 29);
- Abolition of Forced Labour Convention, 1957 (No. 105);
- Minimum Age Convention, 1973 (No. 138);
- Worst Forms of Child Labour Convention, 1999 (No. 182);
- Equal Remuneration Convention, 1951 (No. 100);
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

### **3.4. Children's Rights and Business Principles**

3.4.1. The Children's Rights and Business Principles ("CRBP") is a comprehensive framework established by the UN Global Compact, UNICEF, and Save the Children to address the impact of business on the rights and well-being of children. The Principles are derived from the internationally recognised human rights of children outlined in the Convention on the Rights of the Child ("CRC").

3.4.2. The four core principles underpinning any action concerning children under the CRC are:

- Non-discrimination (Article 2);
- The best interests of the child (Article 3);
- The right to life, survival, and development (Article 6);
- The right of the child to be heard (Article 12).

## **4. OUR COMMITMENTS**

### **4.1. Solarvest is committed to:**

- a) Upholding internationally recognised human rights across our operations and sphere of influence;
- b) Respecting labour rights, including the right to fair wages, ensuring strict compliance with the applicable minimum wage laws and proactively encouraging the adoption of living wage standards wherever feasible, prevention of forced labour and child labour, safe working conditions, non-discrimination, freedom of movement, freedom of expression and association, and respecting the right to freedom of association and collective bargaining, in compliance with local laws and international standards;
- c) Ensuring strict compliance with all applicable local laws and regulations governing working hours and overtime, and actively encouraging work-life harmony amongst our employees by monitoring working hours, discouraging excessive overtime and fostering a culture that prioritises employee well-being;
- d) Ensuring that our suppliers, contractors, and business partners share our commitment to human rights;

- e) Promoting diversity, equity, and inclusion in the workplace by (i) ensuring equal pay, in line with both legal requirements and our commitment to fairness; (ii) prohibiting discrimination based on gender, race, religion, age, sexual orientation, disabilities, nationality, ethnicity or background; (iii) supporting inclusive hiring and promotion cultures; and (iv) providing equal opportunities for career advancement across all levels within the organisation.
- f) Prohibiting all forms of modern slavery, human trafficking, and exploitative labour practices;
- g) Supporting the well-being and rights of indigenous and local communities affected by our operations;
- h) Enforcing a "No Fees" Policy, ensuring that no worker is charged any fees or costs related to their employment, and that all employment-related expenses are borne by Solarvest;
- i) Providing effective channels for grievances and ensuring access to remedy where human rights violations occur.

## 5. OUR APPROACH

### 5.1. Our human rights approach is guided by the following principles:

- a) **Respect:** Actively respect human rights in all our activities.
- b) **Due diligence:** Embed human rights due diligence into operational risk assessments and supply chain screening.
- c) **Remediation:** Provide or cooperate in effective remedy if we cause or contribute to adverse impacts.
- d) **Transparency:** Disclose our efforts, risks, and actions related to human rights in our Sustainability Report.
- e) **Engagement:** Actively engage with affected stakeholders, including employees, local communities, NGOs, and suppliers.
- f) **Accountability:** Maintain robust governance mechanisms for oversight and continuous improvement.
- g) **Work-life harmony:** Foster a work environment that respects personal time and reduces reliance on overtime through operational planning, workforce optimisation and awareness.

## 6. HUMAN RIGHTS DUE DILIGENCE

6.1. Solarvest will conduct human rights due diligence on a regular basis and in response to major operational changes or material stakeholder concerns. Our due diligence processes include:

- a) **Internal operations:** Assessing labour practices, health and safety, and workforce rights.
- b) **Employees:** Gathering feedback through engagement sessions, surveys, and open channels.
- c) **Suppliers & Contractors:** Screening and evaluating suppliers against our Supplier Code of Conduct and ESG standards.

- d) **Project Development & Site Operations:** Ensuring our development and construction activities respect the rights of local communities and workers.
- e) **Trigger Events:** Conducting enhanced reviews in response to media reports, community grievances, or regulatory concerns.

## 7. GRIEVANCE MECHANISM & REMEDY

7.1. Solarvest provides accessible grievance mechanisms for employees, contractors, and external stakeholders to report potential human rights violations, anonymously and without fear of retaliation. We commit to:

- a) Investigating and addressing all substantiated grievances promptly and fairly;
- b) Remedying adverse impacts that we have caused or contributed to;
- c) Engaging with our partners to influence remedy where we are directly linked to human rights impacts through our value chain;
- d) Documenting and monitoring actions taken to prevent recurrence.

**7.2. Any Person may submit their grievances through the following channels:**

**Email:** [grievance@solarvest.com](mailto:grievance@solarvest.com)  
**Grievance Submission Form:**  
<https://forms.office.com/r/RqhfU8wv1V>

### 7.3. Acknowledgment of Grievance

- a) All grievances will be formally acknowledged within **five (5) working days** of receipt.
- b) The acknowledgment will include a reference number for tracking purposes and an estimated timeline for resolution.

### 7.4. Investigation Process

- a) Sustainability Department will oversee the monitoring and assessment of grievances.
- b) Upon receipt, the complaint will be thoroughly investigated on-site in collaboration with relevant site personnel.
- c) A detailed evaluation will be conducted to determine the root cause and necessary corrective and preventive actions.

### 7.5. Documentation and Record-Keeping

- a) All grievances, including interactions, concerns, and resolutions, will be recorded in a **Grievance Register**.
- b) The register will document:
  - Date of submission
  - Complainant details (*if provided*)
  - Nature of the grievance

- Investigation findings
  - Actions taken
  - Resolution and closure status
- c) A Stakeholder Engagement Register will also be maintained to document all engagement activities, feedback, and outcomes related to grievance management.

## 7.6. Resolution and Communication

- 7.6.1. A formal response detailing the findings and corrective actions will be communicated to the complainant within thirty (30) working days, or an update will be provided if further time is needed.
- 7.6.2. If the grievance involves broader stakeholder concerns, a summary of the resolution may be shared publicly (e.g., via company reports or website updates) while maintaining confidentiality.

## 7.7. Monitoring and Reporting

- a) The Sustainability Department will conduct monitoring and evaluation of grievances at the following frequencies:
- a. **Monthly Monitoring:** Review all grievances received, track trends, and ensure corrective actions are effective.
  - b. **Quarterly Review:** Conduct a detailed analysis of grievances, resolutions, stakeholder feedback, and report findings to senior management.
  - c. **Annual Evaluation:** Assess the overall effectiveness of the grievance mechanism, integrate lessons learned into project activities and summarise key insights in sustainability reports and board meetings.
- b) The results of stakeholder engagement activities and grievance resolution efforts will be reported back to affected stakeholders, broader stakeholder groups, the boards, and relevant Project personnel.
- c) A summary of grievances and resolutions will be included in relevant sustainability or corporate reports.

## 7.8. Confidentiality

- 7.8.1. All such disclosures will be treated in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure in the event there is a need to provide a statement as part of the evidence required.



## 7.9. Continuous Improvement

- 7.9.1. The grievance mechanism will be periodically reviewed to ensure its effectiveness and alignment with best practices and regulatory requirements.
- 7.9.2. Stakeholder feedback on the grievance process will be collected to enhance its efficiency and accessibility.

## 8. TRAINING AND AWARENESS

- 8.1. We will provide training to relevant employees and stakeholders to raise awareness about human rights, identify red flags, and strengthen our risk response capabilities. This will include:
  - a) New employee onboarding modules;
  - b) Supplier sustainability briefings;
  - c) Annual refresher sessions for business units and project teams.

## 9. GOVERNANCE

The Human Rights Policy is overseen by Solarvest's SRMC, which reports to the Board of Directors. Implementation is led by the Sustainability Department, in collaboration with Human Resources ("HR"), Procurement, Legal & Compliance, and Head of Departments.

## 10. REFERENCE

This Policy cannot and is not meant to be exhaustive and is to be read in conjunction with the following:

- i. Sustainability Policy
- ii. Anti-Bribery and Corruption Policy
- iii. Code of Conduct and Ethics
- iv. Whistleblowing Policy
- v. Gift and Hospitality Policy

When there is a conflict or discrepancy between this Policy, Solarvest's other policies and procedures, any regulatory guidelines and any relevant local laws, the matter must be referred to the Solarvest Group HR Department for clarification and guidance.

## 11. REVIEWING OF POLICY

Solarvest reserves the right to review, amend, or update this Policy periodically to reflect changes in circumstances, regulatory requirements, or operational needs.

Any revisions will be communicated to all relevant stakeholders to ensure continued compliance and alignment with Solarvest's principles and legal obligations.

