



<b>Title</b>	GSPP Code of Conduct
<b>Document No.</b>	HCD-PL-08-R9
<b>Department</b>	Human Capital
<b>Approved by</b>	Senior General Manager – Human Capital
<b>Policy Effective Date</b>	01 January 2022

#### Document Revision Control

Version No.	Description	Prepared by	Reviewed By	Effective Date
R0	Original	Sharifah Omar	Mitzvah Mohamed Tajudin	01.01.2022
R1	Response to Audit Findings	Sharifah Omar	Mitzvah Mohamed Tajudin	01.06.2022
R2	Response to Audit Findings	Sharifah Omar	Mitzvah Mohamed Tajudin	01.12.2022
R3	Compliance with Ethical Standards	Sharifah Omar	Mitzvah Mohamed Tajudin	01.06.2023
R4	Introduction to Suppliers	Sharifah Omar	Mitzvah Mohamed Tajudin	01.10.2023
R5	Acknowledgement by Suppliers	Sharifah Omar	Mitzvah Mohamed Tajudin	01.12.2023
R6	Renumbering & Including ESG	Sharifah Omar	Mitzvah Mohamed Tajudin	01.03.2025
R7	Custom Complaint & Security	Sharifah Omar	Mitzvah Mohamed Tajudin	17.09.2025
R8	Change Format	Kelly Ang	Mitzvah Mohamed Tajudin	01.12.2025
R9	Change OJI Logo	Sharifah Omar	Mitzvah Mohamed Tajudin	01.01.2026

#### Introduction

GSPP Holdings Sdn Bhd (GSPP) and its Subsidiaries set out to establish the Code of Conduct emphasizing on operational ethics where GSPP and its Suppliers and Subcontractors shall comply with all norms and legal requirements relevant to their business in line with international business standards and human rights values.

GSPP shall comply with the Code as a total supply chain initiative. GSPP shall also require its next tier suppliers to acknowledge and implement the Codes to full fill all of its activities and must operate in full compliance with the laws, rules and regulations of the countries in which it operates. Suppliers are obliged to ensure that the standards set out in the Code of Conduct are not only observed in their own facilities but also communicated to their own suppliers.

#### Policies

##### 1.0 Prohibition of Forced Labour

All work shall be entered freely and voluntarily. There will be no forced, bonded, indentured, involuntary prison labour, slavery or trafficking of persons.

No unreasonable restrictions on workers' freedom of movement in the facility and company provided facilities including, if applicable, workers' dormitories or living quarters.



All workers are provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment.

Foreign workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

Any recruitment fees, payment to employers or other related fees for employment shall not be paid by the workers. Workers must have full access to their personal identification documents at all time. Workers shall be free to terminate their employment by giving reasonable notice to the company without fear of penalty.

## 2.0 Young Workers

The employment of a person who is 18 years old and above in GSPP is primarily covered under Employment Act 1955.

The employment of children and young persons in GSPP is ensured according to the Children and Young Persons (Employment) Act 1966 (CAYPEA). A 'child' refers to a person under the age of 15 years old, whereas a 'young person' refers to a person who is 15 years old or above but under the age of 18 years old, as seen in Section 1A of the CAYPEA amended by virtue of the 2019 Amendments.

## 3.0 Working Hours, Wages and Benefit

Working hours shall not be excessive and shall be in line with national limits. Overtime must be voluntary and paid at a premium rate in line with legal requirements. All workers must receive at least one rest day in every seven days.

Only workers with legal rights to work shall be employed. All workers shall be briefed and provided with written and understandable information e.g. employment contract about their wages and legally mandated benefits before they sign their employment contract, including any overtime rates and circumstances where pay may be deducted.

Workers shall be entitled to paid annual leave, public holidays, medical leave and benefits in accordance with National laws.

Deduction from wages as disciplinary measure shall not be allowed if not legally permitted, and even where legally permitted, should be minimised.

For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

## 4.0 No Discrimination / No Harassment / Humane Treatment

GSPP is committed to a workplace free of harassment and unlawful discrimination. There shall be no harsh and inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the treat of any such treatment.

GSPP will not engage in discriminate or harassment based on race, colour, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion or marital status in hiring and employment practices such as wages, promotions, rewards and access to training. Men and women of all nationalities will receive equal remuneration for work of equal value.

Workers shall be provided with reasonable accommodation for religious practices and disability.



In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

#### **5.0 Freedom of Association and Collective Bargaining**

GSPP has established the Joint Consultative Committee (JCC) among the Management and employees in order to communicate, bridging the needs and understanding of both parties, & policy consultation.

JCC members are elected democratically in a free and fair election among employees. This is to ensure capable and trusted leaders are elected and are able to represent the will and need of GSPP employees.

#### **6.0 Fair Disciplinary Practices**

Physical abuse, discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Disciplinary procedures should always include an escalating series of verbal and written warnings including an internal enquiry prior to suspension or dismissal. Workers and supervisors should be made aware of the employer's grievance procedures and have the right to lodge complaints regarding disciplinary issues without fear of retaliation.

#### **7.0 Compliance with National Law and Related Regulation**

GSPP comprehensive handbook stipulated the required obligation of an employer and the employee. The handbook will be amended from time to time in line with national law.

#### **8.0 Occupational Health & Safety**

GSPP shall comply with relevant laws and regulations to ensure workers operate in safe working environment where appropriate measures are in place to prevent any work-related accidents.

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards etc) shall be identified and assessed, mitigated using the Hierarchy of Controls.

Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

GSPP shall provide workers with appropriate workplace health and safety information and training in the language of the workers or in a language the worker can understand for all identified workplace hazards that workers are exposed to including but not limited to mechanical, electrical, chemical, fire and physical hazards.

Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Workers are encouraged to raise any health and safety concerns without retaliation.

#### **9.0 Emergency Preparedness**

GSPP shall identify and assess any potential emergency situations and events, and to ensure their impact are minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, workers training and drills.

Emergency drills shall be executed at least annually.

#### **10.0 Occupational Injury and Illness**

Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illness, including provisions to encourage worker reporting, classify and record injury



---

and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate the causes, and facilitate the return of workers to work.

#### **11.0 Industrial Hygiene**

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated and controlled according to the Hierarchy of Controls. GSPP shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring or workers' health and working environments.

GSPP shall provide occupational health monitoring to routinely evaluate if worker's health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

#### **12.0 Physically Demanding Work & Machine Safeguarding**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

#### **13.0 Sanitation, Food and Worker Accommodation**

Workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Any accommodations provided for workers must be safe, clean and suitable for residential use, in line with the recently enforced Act 446. Employees' Minimum Standards of Housing, Accommodation and Amenities Act 1990.

Accommodation must be separate from productions areas and segregated by gender. Each worker must have their own bed. Toilets and showers must be kept clean and separated by gender.

#### **14.0 Environment**

GSPP has a responsibility to protect human health and the environment by meeting applicable environmental legislation including air emissions, solid/hazardous waste and water discharge.

The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

All required environmental permits, approvals and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.

Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance, and facility processes or by other means.

Chemicals, waste and other materials posing a hazard to humans or the environment shall be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. A systematic approach to identify, manage, reduce and responsibly dispose of or recycle solid waste (non-hazardous) shall be implemented. All wastes data shall be tracked and documented.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized,



routinely monitored, controlled and treated as required prior discharge. Routine monitoring of the performance of its air emission control systems shall be conducted.

GSPP shall adhere to all applicable laws, regulations and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

#### **15.0 Water Management**

GSPP shall implement a water management program that documents, characterizes and monitors water sources, use and discharge; seek opportunities to conserve water; and controls channels of contamination.

All wastewater shall be characterised, monitored, controlled and treated as required prior to discharge or disposal. GSPP shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

#### **16.0 Energy Consumption and Greenhouse Gas Emissions**

GSPP shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2 and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented and publicly reported.

#### **17.0 Business Integrity, No Proper Advantage and Fair Business**

The highest standards of integrity are to be upheld in all business interactions. GSPP shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted.

Standards of fair business, advertising and competition are to be upheld. All business dealings shall be transparently performed and accurately reflected on the GSPP's business books and records.

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. GSPP is having a communication process for the personnel to be able to raise any concerns without fear of retaliation.

#### **18.0 Privacy & Data Protection**

GSPP shall commit to protecting the reasonable privacy expectations of everyone they do business with, including suppliers, customers and employees. GSPP shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

#### **19.0 Anti-Bribery and Transparency**

GSPP will not tolerate, permit or engage in bribery, corruption or unethical practices with public officials or individuals in the private sector.

GSPP shall have programs and reporting channel in place to ensure that whistle blowers may raise concerns confidentially, anonymously and without fear of retaliation as permitted by law.

#### **20.0 Protection of Identity and Non-Retaliation**

GSPP shall ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers' are to be maintained, unless prohibited by law.

GSPP will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm.



### 21.0 Material Restrictions & Responsible Sourcing of Materials

GSPP shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

Materials and minerals in GSPP products must be sourced in an environmentally responsible manner and in safe working conditions where work is chosen freely.

GSPP shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold (3TG) in the products we manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Cooperation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognised due diligence framework.

### 22.0 Management Systems

GSPP shall establish a management system with a scope that is related to the content of this Code.

The management system shall be designed to ensure:

- (a) compliance with applicable laws, regulations and customer requirements related to the GSPP's operations and products;
- (b) conformance with this Code; and
- (c) identification and mitigation of operational risks related to this Code.

It should also facilitate continual improvement.

The management system shall contain the following element:

- 1) Company Commitment
- 2) Management Accountability and Responsibility
- 3) Legal and Customer Requirements
- 4) Risk Assessment and Risk Management
- 5) Improvement Objectives
- 6) Training
- 7) Communication
- 8) Worker/Stakeholder Engagement and Access To Remedy
- 9) Audits and Assessments
- 10) Corrective Action Process
- 11) Documentation and Records
- 12) Supplier Responsibility

### 23.0 Custom Compliant

GSPP is committed to full compliance with all applicable customs laws and regulations. We ensure that all items produced is accurately marked and labelled in accordance with legal requirements, including correct country of origin and other necessary product information.

To maintain transparency and traceability, we keep complete and accurate records of all materials, purchase and sales orders, production activities, and shipments. Detailed production records are maintained to verify that goods are legitimately manufactured within our facility and properly documented for export. These practices prevent illegal transshipment, support lawful trade, and uphold the integrity of our operations.

### 24.0 Security

GSPP is committed to maintaining a safe and secure working environment by implementing appropriate security procedures to ensure that all personnel property, materials and finished goods are safeguarded against theft, loss or unauthorized access at all times. Access to the facility is controlled and limited to authorized personnel only and visitors are properly identified and monitored.



Security measures are applied throughout the supply chain including during the storage and transportation of products to prevent tampering or illegal activities. Through these measures, we uphold the integrity of our operations.

**25.0 Code of Conduct Implementation**

Suppliers must establish internal management systems and processes to ensure that the requirements of GSPP Code of Conduct are observed.

In order to ensure that the requirements in the Code of Conduct are met in the supply chain, GSPP reserves the right to audit or authorise a third party to audit any Supplier that is engaged in the production, processing, service or supply of materials for GSPP products, services and technology.

All GSPP's audits shall require full cooperation from the Suppliers and may include any subcontractor or labour agent used by the Supplier. Audits may occur with or without advance notice.

All Suppliers must observe strict compliance of this Code of Conduct and any breach of the same may be regarded as a material breach of the Supplier's contract/agreement with GSPP. Upon review of audit results and whenever appropriate, GSPP shall provide a mechanism to rectify the breach or non-compliance with Code of Conduct within a period of three (3) months to resolve the issue. After the given period, if Supplier failed to comply without an acceptable justification, GSPP at its sole discretion may cancel a purchase order or terminate any existing contract/agreement entered with the Supplier.

Approved by

**Mitzvah Mohamed Tajudin**  
Senior General Manager-Human Capital



---

**SUPPLIER ACKNOWLEDGEMENT**

We have received the GSPP Code of Conduct and understand that compliance is a fundamental condition of the contractual relationship with GSPP.

Supplier Name : \_\_\_\_\_

Facility Address : \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Phone : \_\_\_\_\_

Email Address : \_\_\_\_\_

Signature of Company Director :

\_\_\_\_\_

Name of Company Director :

Date :

Company's Rubber Stamp :