



ANTI-SEXUAL HARASSMENT POLICY

1.0 POLICY STATEMENT

- 1.1 RCE Capital Berhad and its subsidiaries ("RCE Group") is a dynamic Group of diverse generations, cultures and backgrounds. Behaviour that is acceptable to one person may be unacceptable to another. Furthermore, it may be illegal.
- 1.2 RCE Group is committed in providing a work environment that is free of sexual harassment and all forms of sexual violence, intimidation or exploitation.

2.0 SCOPE

- 2.1 The policy applies to all employees of RCE Group, regardless of their positions, employment status or gender.
- 2.2 Where applicable, this policy also applies to any person engaged in or participating in any RCE Group's activity, both on-site, off-site or through virtual platforms.

3.0 OBJECTIVES

- 3.1 The objectives of this policy are to:
 - Promote a work environment that is free from sexual harassment and inappropriate conduct of a sexual nature;
 - Foster a culture of mutual respect, professionalism and dignity in workplace;
 - Raise awareness of sexual harassment and educate employees on acceptable workplace behaviour;
 - Provide a framework for reporting, investigating and resolving complaints of sexual harassment; and
 - Ensure compliance with applicable laws and organisational requirements.

4.0 DEFINITION

- 4.1 Sexual harassment is defined as:
 - unwanted conduct of a sexual nature that may cause discomfort, humiliation, intimidation or affect an individual's dignity;
 - unwelcome sexual advances;
 - requests for sexual favours; and/or
 - other visual, verbal or physical conduct of a sexual nature.

4.0 DEFINITION (CONT'D)

4.2 These can occur where:

- 4.2.1 It is implicitly or explicitly suggested that submission to or rejection of the conduct will be a factor in employment performance decisions or evaluations or permission to participate in any RCE Group's activity; or
- 4.2.2 The conduct, whether subtle or blatant, has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

5.0 ROLES AND RESPONSIBILITIES

5.1 RCE Group's Responsibilities

When any allegation of sexual harassment occurs, RCE Group will act to stop the harassment immediately, prevent its recurrence and take appropriate action against those responsible.

5.2 Employees' Responsibilities

While RCE Group has a policy in place, full achievement of our goal requires understanding, goodwill and effort on the part of everyone. It is expected that everyone under the employment of RCE Group will treat one another with respect, dignity and professionalism.

6.0 ZERO-TOLERANCE

- 6.1 RCE Group adopts a zero-tolerance approach towards any form of sexual harassment and expects all employees to uphold a workplace culture founded on respect, dignity and professionalism.
- 6.2 Any allegation of sexual harassment will be taken seriously and assessed promptly, fairly and objectively.

7.0 SANCTIONS

- 7.1 Those who violate the policy are subject to disciplinary actions including immediate termination or as per RCE Employee Handbook.

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8.0 FREEDOM OF EXPRESSION

- 8.1 RCE Group is committed to the principles of free inquiry and free expression. The Anti-Sexual Harassment Policy is not intended to stifle the growth of any individuals nor the freedom of expression.
- 8.2 However, sexual harassment is neither a legally protected expression nor the proper exercise of freedom of expression. It compromises the integrity of RCE Group, its vision of peace and harmony and the trust placed in its employees.

9.0 CONFIDENTIALITY

- 9.1 All complaints, investigations, records and information will be treated with strict confidentiality.
- 9.2 Information will only be disclosed on a need-to-know basis for the purpose of investigating, resolving or managing the complaint.

10.0 NON-RETALIATION

- 10.1 Under no circumstances will RCE Group allow reprisals against a person who in good faith reports or provides information about sexual harassment or behaviour that might constitute sexual harassment.

11.0 FALSE ALLEGATION

- 11.1 Intentionally making a false report or providing false information is grounds for discipline.

12.0 UNWANTED BEHAVIOUR THAT IS NOT SEXUAL IN NATURE

- 12.1 Other forms of unwanted behaviour that are not sexual in nature may constitute a violation if they are inappropriate, offensive, abusive, discriminatory or inconsistent with the standard of conduct expected by RCE Group.

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13.0 MYTHS AND MISCONCEPTIONS

13.1 There are many common misconceptions about types of sexually harassing behaviours.

1. Only women are sexually harassed and only men are sexual harassers.

Anyone, regardless of gender, can be the victim of sexual harassment or a harasser.

2. Sexual harassment always occurs between a man and a woman.

Sexual harassment can be between people of the same gender or different genders.

3. Only the person who is directly sexually harassed is the victim.

Third parties who witness sexual harassment or are aware of it may also be victims of harassment.

4. Sexual harassment requires touching.

Sexual harassment does not need to have a physical component, such as upskirting, leering and sexually suggestive gestures.

5. Sexual harassment is always verbal.

Talking is not a necessary part of sexual harassment.

6. It was a compliment, so it's not sexual harassment.

Even if a person intends their conduct to be flattering, it may still be offensive to others.

7. It can't be a sexual harassment—he was only joking.

Even though a person intends their conduct to be funny, it may still be offensive to others.

8. If the offensive conduct happens off-office site, it doesn't violate RCE Group's Anti - Sexual Harassment Policy.

Inappropriate conduct that occurs off-office site between colleagues, vendors and friends can violate RCE Group's Anti - Sexual Harassment Policy if it contributes to a hostile environment or involves quid-pro-quo harassment.

9. Sexual harassment is motivated by a desire for sex.

Sexual harassment is often motivated by dominance, power, and/or bullying.

10. If I ignore sexual harassment, it will go away.

Unfortunately, ignoring sexual harassment usually does not make it go away. In fact, the problem may get worse.

11. Sexual harassment occurs only when there is a power difference between the parties.

Sexual harassment can occur between peers, as well as between individuals in a hierarchical relationship.

12. The behaviour must be repeated to be sexual harassment.

Sexual harassment could consist of repeated actions, or may arise from a single incident, if it is sufficiently egregious.

14.0 DANGER ZONE

- 14.1 Certain behaviour could be interpreted as sexually harassing, depending on the circumstances.
- 14.2 Whether behaviour is offensive or not depends on how it is perceived, not how it was intended. Sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome.
- 14.3 The following behaviours may constitute "Danger Zones":
1. Inappropriate e-mail and sexually explicit internet use;
 2. Comments on personal appearance;
 3. Hugging, massages and other touching;
 4. Unwanted, repeated requests for dates;
 5. Off-colour jokes and innuendo;
 6. Sexually explicit profanity;
 7. Nicknames and stereotypes;
 8. Invading someone's personal space;
 9. Intrusive personal or sexually explicit questions;
 10. Suggestive looks, gestures or sounds;
 11. Ridiculing someone's sexual orientation;
 12. Spreading rumours about someone's sexual conduct; and/or
 13. Public displays of sexually explicit pictures, calendars, cartoons, etc.

This list is non-exhaustive and provided for guidance purposes only.

15.0 EFFECTS OF SEXUAL HARASSMENT

- 15.1 The effects of experiencing sexual harassment can be profound and can range from uncomfortable to devastating. They may last a short or long time and can even generate a "ripple effect" of negative symptoms in the affected workplace or living environment.
- 15.2 If you have been the target of sexual harassment, you may have experienced:
- Having trouble paying attention and staying focused on your work;
 - Participating less in group meetings, or skipping them;
 - Wanting to use sick days to avoid going to work;
 - Staying away from certain places;
 - Thinking of quitting your job;
 - Anger, fear, self-consciousness or embarrassment;
 - Stress;
 - Depressed;
 - Difficulty sleeping;
 - Loss of appetite;
 - Headaches;

15.0 EFFECTS OF SEXUAL HARASSMENT (CONT'D)

15.2 Cont'd

- Nausea; and/or
- Lowered self-esteem.

Be sure to ask for help if you are experiencing any of these.

16.0 WHAT TO DO IF YOU HAVE BEEN OR ARE BEING SEXUALLY HARASSED?

16.1 If you experience or are subjected to sexual harassment, you are encouraged to take the following steps:

- Tell the alleged harasser that you don't like his/her behaviour and that you want him/her to stop.
- If the behaviour continues, report to Human Resource Unit ("HR") and/or Immediate Superior ("Designated Person") immediately.
- Tell a trusted colleague who can give you emotional support.
- Keep all evidence of the behaviour for e.g. emails, sms, etc.
- Keep a written account of the incident(s), including date, time, name(s) of individual(s) involved and how the incident(s) happened.
- Provide details and cooperate with the investigation process to allow RCE Group to review the matter promptly, fairly and objectively.
- If no action is taken or there is no one you can report this to, you may lodge a report with the Labour Department, Social Welfare Department, police or Talian Kasih (15999) for support service, as appropriate.

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17.0 COMPLAINT PROCEDURES

17.1 The victim/employee/complainant can approach Designated Person to lodge a complain about sexual harassment as follows:



Incident of sexual harassment occurs.



Approach Designated Person to lodge a complaint.



Upon receiving the complaint, the Designated Person to:

1. Record the date, time and fact of the incident;
2. Investigate the incident;
3. Discuss and agree on the appropriate course of action to resolve the matter;
4. Ensure Chief Executive Officer ("CEO")/Deputy Chief Executive Officer ("DCEO") are kept informed of the progress timely; and
5. Maintain a confidential record of all discussions.



Notify victim/employee/complainant on actions taken.

17.2 Where a complaint involves significant risk to RCE Group, including but not limited to repeated misconduct, potential legal implications, reputational impact or matters requiring higher-level oversight, the case may be escalated to Risk Management Committee and in accordance with Delegation of Authority and Authority Limit Policy.

18.0 REVISION

18.1 CEO/DCEO has the discretion to add, amend or vary the requirements stipulated in all Policies, if deemed necessary.

18.2 This policy is subject to periodic review and will be revised as and when required, to remain current and effective.