

PAVILION

REAL ESTATE INVESTMENT TRUST

*Managed by
Pavilion REIT Management Sdn Bhd*

HUMAN RIGHTS POLICY

Effective Date : 8 February 2024

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1 Introduction & Purpose

The purpose of this policy is to promote and uphold human rights at Pavilion REIT's workplace in accordance with the UN Guiding Principles on Business and Human Rights. Pavilion REIT Management Sdn Bhd ("PRMSB") or the "Company" or "Manager"), the management company of Pavilion Real Estate Investment Trust ("Pavilion REIT") is committed to meeting the standards and practices that are consistent with internationally recognized principles subject to the local laws and regulations in which Pavilion REIT's properties' operate.

Respect for human rights is a fundamental value of the Company and it believe that everyone has the right to be treated with fairness, respect and dignity in the workplace.

2 Scope and Applicability

This Policy shall apply to all employees including full-time, part-time, casual and contract employees as well as interns and directors of the Company. The Manager is committed to upholding human rights, not only for its own employees but also for its tenants, business partners, external parties, trustees, agents, advisors, vendors, suppliers, contractors, consultants, representatives, and employees of Kuala Lumpur Pavilion Sdn Bhd who provide services for or on behalf of Pavilion REIT (collectively, "Business Associates"). The Manager encourages its Business Associates to adopt similar human rights policies within their own operations.

This Policy shall be read together with the Company's Code of Conduct & Ethics and Whistleblowing Policy.

3 Policy Statement and Commitment

Company's Commitment to Human Rights

The Manager is committed to uphold and comply with the following international human rights laws including:

- The United Nations (UN) Universal Declaration of Human Rights
- The United Nations (UN) Guiding Principles on Business and Human Rights

The Manager respect the rights of its employees, stakeholders and communities through its commitments as follows:

A. Non-Discrimination, Workforce Diversity and Equal Opportunity

The Manager value diversity and inclusion in the workplace and is committed to equal opportunity and are intolerant of discrimination and harassment. The Manager strive to maintain a workplace that is free from discrimination or harassment on the basis of race, sex, colour, ethnicity, national or social origin, religion, age, disability, sexual orientation or any other status protected by applicable laws.

The basis of recruitment, development, training, compensation and advancement is qualifications, performance, skills and experience. All employees have equal access to career development opportunities appropriate to their qualifications, experience and abilities.

B. Freedom of Association

The Manager respect the freedom of association and collective bargaining to support the fair and equitable treatment of its employees.

C. Safe and Healthy Workplace

The Manager is committed to providing a safe and healthy workplace for its employees and complying with applicable safety and health laws and regulations as well as internal requirements.

The Manager work to provide and maintain a safe and healthy workplace, in consultation with its employees, by addressing and remediating identified risks of accidents, injury and health impacts.

D. Prevention of Violence at the Workplace

The Manager is committed to providing and maintaining a safe and respectful environment for all employees. As part of this commitment, the Manager established and maintain strict

policies and procedures to prevent and address any form of violence, harassment, or sexual harassment at the workplace.

E. Compliance to Local Laws on Minimum Wage and Working Hours

The Manager is committed to comply with local employment laws regarding minimum wage, working hours and other employee compensation.

F. Prevention of Forced Labour

The Manager prohibit the use of all forms of forced labour including modern forms of slavery and any form of human trafficking.

G. Protection of the Rights of Children

The Manager prohibit the hiring of child labour in all its business operations. The minimum age for employment shall be guided by the Children and Young Persons (Employment) Act 1966.

References

- United Nations (UN) Universal Declaration of Human Rights
- United Nations (UN) Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) on Labour Standards
- Employment Act 1955
- Children and Young Persons (Employment) Act 1966
- Minimum Wage Order 2022

4 Roles and Responsibilities

Role	Responsibilities
Employee	i. Read, understand and comply with this policy. ii. Treat everyone with dignity, courtesy and respect.
Supervisor/ Section Manager/	i. Lead by example by exhibiting appropriate standards of behaviour. ii. Educate and promote awareness of this policy to employees. iii. Take prompt and fair action when they are made aware of any breach of

Role	Responsibilities
Head of Department	<p>this policy.</p> <p>iv. Create awareness and communicate this policy to our business partners and stakeholders for their information and adherence.</p>
Human Resources Department	<p>i. Ensure adequacy and effectiveness of this policy.</p> <p>ii. Educate and promote awareness of this policy to employees.</p> <p>iii. Handle complaints/cases promptly and fairly.</p> <p>iv. Take appropriate disciplinary action where there is proven breach of this policy.</p>
Chief Executive Officer	<p>i. Endorse and ensure the implementation of this policy.</p> <p>ii. To report on compliance to the Sustainability Committee with Board oversight on this policy.</p>

5 Reporting

Any employee who believes there is a potential violation of this policy may report to his/her Superior according to the grievance procedure as stated in the Whistleblowing Policy or to Human Resources Department.

Employees may also report suspected policy violations through the appropriate Whistleblowing channel without fear of discrimination or retaliation via:

<https://bdoethics.com/v1/r/QxgwQn00Eyx5cz2z6DILFLAGx4xDL6x9>

The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action.

6 Review of this Policy

This policy will be reviewed at least once every two (2) years or when there are changes made to the procedures.