

Sexual Harassment Policy

SEXUAL HARASSMENT POLICY

1. Introduction

Kinergy Advancement Berhad and its Group of Companies ("Kinergy" or "the Group") is committed to maintaining a safe, respectful, and harassment-free work environment. The Group strictly prohibits all forms of sexual harassment and is dedicated to protecting employees from any behaviour that threatens their dignity, safety, or well-being. This policy outlines the Group's commitment, responsibilities, and procedures for preventing and addressing sexual harassment in the workplace.

2. Scope

This policy applies to all employees of the Group, including permanent, probationary, contract staff, interns, trainees, and temporary personnel. It also covers directors, management, and third parties such as contractors, vendors, suppliers, consultants, and visitors who engage with the Group. The policy applies to all work-related environments, including the Group's premises, project sites, external events, business travel, work functions, and digital communication platforms used for work purposes such as email, messaging apps, calls, and social media.

3. Definition of Sexual Harassment

Sexual harassment refers to any unwanted, unwelcome, or inappropriate conduct of a sexual nature that causes discomfort, humiliation, intimidation, or creates a hostile work environment. Such behaviour may be verbal, non-verbal, visual, physical, or digital. This includes sexual comments, jokes, propositions, sexual gestures, displaying explicit material, sending sexual messages or images, or unwanted physical contact such as touching, grabbing, hugging, or assaulting someone. Any conduct of a sexual nature that is unwelcome may constitute sexual harassment under this policy.

4. Zero Tolerance Commitment

The Group maintains a strict zero-tolerance stance against sexual harassment. All employees, regardless of position or seniority, must uphold professional behaviour and show respect at all times. Any act of sexual harassment is treated as serious misconduct. Violations may result in disciplinary action, including counselling, written warning, suspension, demotion, transfer, termination, or referral to law enforcement authorities when criminal behaviour is involved.

5. Responsibilities

The Group is responsible for ensuring a harassment-free workplace and for taking all necessary steps to prevent, address, and resolve incidents of sexual harassment. This includes clearly communicating the policy, ensuring employees understand acceptable behaviour, and providing safe channels for reporting. Employees are responsible for complying with the policy, treating colleagues respectfully, refraining from inappropriate behaviour, reporting incidents promptly, and cooperating in investigations.

6. Reporting of Sexual Harassment

Employees who experience or witness sexual harassment are encouraged to report the incident immediately. Reports may be made to the Human Resources Department and the Whistleblowing Committee, or any formal reporting channel established by the Group such as whistleblowing email hotline (whistleblowing@kinergyadvancement.com) and anonymous reporting box. Reports may be verbal or written, and may include any supporting evidence such as screenshots, messages, or witness information. The Group assures that no employee will face repercussions, victimisation, or penalties for lodging a good-faith complaint.

7. Investigation Process

All complaints of sexual harassment will be handled in accordance with the Group's Sexual Harassment Investigation Standard Operating Procedure ("SOP") by Human Resources Department and reporting to the Top Management. The SOP outlines the detailed investigation steps, timelines, confidentiality measures, interviewing process and reporting obligations. All investigations will be handled impartially, confidentially, and with sensitivity. Once concluded, both the complainant and the accused will be informed of the outcome and any resulting actions.

8. Protection Against Retaliation

The Group strictly prohibits retaliation against any individual who reports, participates, or acts as a witness in a sexual harassment case. Retaliation is a separate and serious offence and will result in disciplinary action. The Group is committed to ensuring that employees feel safe, supported, and protected when raising concerns.

9. Confidentiality

All complaints and investigation outcomes will be managed with strict confidentiality. Information will only be shared with individuals directly responsible for addressing or resolving the matter. Disclosure will occur only where legally required or essential to the investigation process.

10. Policy Review

This Policy is subject to periodic review and refinement to ensure ongoing relevance, effectiveness and alignment with emerging regulatory requirements, industry best practices, including the Employment Act and the Code of Practice on the Prevention and Eradication of Sexual Harassment in the Workplace, and stakeholder expectations. This Policy was approved by the Management of Kinergy on 24th November 2025.