



Version 2: 28 February 2025

**Wilmar Group Policy:**  
**Sexual Harassment, Violence and Abuse, and  
Reproductive Rights Policy**

Wilmar International Limited ("Wilmar") endeavours to provide a conducive working environment that is characterized by equality and mutual respect. To that end, this Sexual Harassment, Violence and Abuse, and Reproductive Rights Policy encourages the reporting of all incidents of sexual harassment, violence or abuse; or infringement of reproductive rights experienced by any individual - regardless of gender- as a result of or in the course of his or her work with Wilmar.

Wilmar will take all reasonable measures to prevent such incidents and deal promptly and fairly with any reports of sexual harassment in a confidential and discreet manner. Where allegations of sexual harassment, violence or abuse; or infringement reproductive rights are substantiated, the offender will be sanctioned in strict accordance with this Policy, regardless of his/her or status in Wilmar.

## 1. Definitions

### 1.1. Sexual harassment

Sexual harassment is defined as the making of unwanted conduct of a sexual nature, in any form, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive or humiliating or is a threat to his well-being arising out of and in the course of his or her employment.

These actions are considered harassment when:

- a) Such conduct is made either implicitly or explicitly a term or condition of an individual's continued employment, career advancement or promotion;
- b) Submission to or rejection of such conduct by an individual is used as the basis for employment or career decisions affecting such individual; or
- c) The conduct has the purpose or effect of unreasonably interfering with an individual's work or job performance or creating an intimidating, hostile, or offensive working environment.

### 1.2. Violence or abuse

It is any act in which any person is abused, threatened, intimidated or assaulted in his or her employment. Workplace violence and abuse includes:

- a) Physical attacks: involving contact that cause, intentionally or otherwise, feelings of intimidation, pain, injury, or other physical suffering or bodily harm.

- b) Threatening behaviour: intentionally putting another person in fear of imminent bodily injury or injury to reputation.
- c) Verbal or written threat/abuse: any expression with an intent to inflict harm or a form of psychological or emotional abuse involving the use of threatening language.
- d) Emotional/psychological abuse: any deliberate behaviour to make the individual feel diminished, degraded or embarrassed, privately or publicly humiliating, implicitly blackmailing, withholding information, isolating an individual, controlling and suppression of the access or other basic resources and necessities.

### 1.3. Reproductive rights

Reproductive rights are legal rights and freedom relating to reproduction and reproductive health as couples and individuals:

- a) To decide freely and responsibly the number, spacing and timing of their children.
- b) To make decisions concerning reproduction free of discrimination, coercion and violence.

## 2. Application

- 2.1. This Policy is designed to protect all employees of the Company, and applies to peers as well as superior-subordinate relationships and in relationships with third-parties or business partners. It also applies to all individuals, regardless of gender.
- 2.2. This Policy also applies to employees' family members or individuals residing in company premises as well as contractors who are directly managed by the Company. All individuals covered under this Policy are expected to adhere to its principles.

## 3. Provisions

- 3.1. Any individual who experiences sexual harassment, violence or abuse; or infringement of reproductive rights may make a complaint by reporting to the Internal Audit Department, Human Resource Department or to the respective Head of Department. Detailed procedures on reporting violations and whistleblowing can be found under the Whistleblowing Policy.

- 3.2. Further harassment, violence or abuse; or infringement of reproductive rights against complainants or retaliation against complainants or others who participate in the investigation process of a complaint or disciplinary proceedings will not be tolerated. Appropriate disciplinary and/or remedial actions will be taken against individuals found to engage in such misconduct.
- 3.3. Employees have a duty and obligation to cooperate fully in investigations and disciplinary proceedings, if any.
- 3.4. It is the obligation and shared responsibility of all employees to adhere to this Policy, and prevent its misuse.

#### 4. Enforcement Principles

Enforcement and implementation of this policy will observe the following principles:

- Investigations will be conducted promptly and thoroughly upon receiving the complaint;
- Where a charge of sexual harassment, violence or abuse; or infringement of reproductive rights is substantiated, the Company will act fairly and justly in commencing disciplinary proceedings which may result in imposing an appropriate sanction, up to termination of employment. In cases involving criminal offenses, the Company may escalate the matter to law enforcement authorities or take other appropriate legal measures.
- Seniority and/or status in the Company have no bearing on or will not affect the decision as to the appropriate sanctions in the circumstances;
- Both the complainant and the alleged harasser may be informed of the findings and notified of the outcome of the complaint after the investigation or disciplinary process is concluded, as deemed appropriate;
- The Company shall maintain a written record of each complaint and how it was investigated and resolved. Records will be maintained in a confidential manner.