PNB

# Business And Human Rights Policy



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# PERMODALAN NASIONAL BERHAD BUSINESS AND HUMAN RIGHTS POLICY

## 1.0 ABOUT THIS DOCUMENT

### 1.1 Background

Permodalan Nasional Berhad ("PNB", "we" or "our") acknowledges the critical importance of Business and Human Rights to the societal well-being and long-term prosperity. For the purposes of this Policy, Business and Human Rights refers to the responsibility of businesses to respect human rights and address adverse human rights impacts in accordance with internationally recognised standards. As both a fund management company and a major institutional investor, PNB is committed to supporting long-term sustainability of Business and Human Rights across employees, suppliers, communities and customers to support the long-term sustainability of our investee companies.

The PNB Business and Human Rights Policy ("Policy") was developed with reference to internationally recognised principles and standards, including but not limited to the International Labour Organisation Standards (ILO), United Nations Global Compact (UNGC), United Nations Guiding Principles on Business and Human Rights (UNGP BHR), United Nations Development Programme (UNDP), OECD Guidelines for Multinational Enterprises, United Nations' Principles for Responsible Investment -> Principles for Responsible Investment (UNPRI), United Nations Sustainable Development Goals (UNSDG), and Global Reporting Initiative (GRI) Reporting Standards. In addition, it is also in line with local frameworks, laws and regulations such as the Employment Act 1955 of Malaysia, as well as Malaysia's National Action Plan on Business and Human Rights (NAPBHR).

In applying this Policy, PNB recognises Business and Human Rights as reflected in internationally recognised standards and principles, while interpreting and implementing such rights in a manner that is consistent with applicable Malaysian laws, regulations and the Federal Constitution of Malaysia.

### 1.2 Scope

The Policy complements PNB's Sustainability Policy and outlines our key approaches and shareholder expectations with respect to managing Business and Human Rights risks and impacts.

This Policy considers the full scope of rights, without being exhaustive, by focusing on key directional areas. These include fundamental labour rights, Indigenous rights, community rights (such as Free, Prior, and Informed Consent ("FPIC")), digital and data rights, and issues pertaining to security and conflict zones. PNB also emphasises the importance of access to remedy and robust grievance mechanisms for all.

This Policy is applicable to PNB investee companies (both domestic and international) (collectively, "Companies"). This Policy will also apply to PNB's group of companies ("PNB Group"), the entities that we own, and the facilities that we manage.

## 1.3 Approval

This Policy shall be implemented upon the initial approval of the Board of Directors. Any subsequent material variation and/or amendment to this Policy, may be approved by the Management Sustainability Committee ("MSC"). Any non-material variation and/or amendment to this Policy, may alternatively be approved by the President and Group Chief Executive ("PGCE") as deemed fit.

In the event of an immediate change in the regulatory requirement, that may affect this Policy, the Head of Corporate Sustainability and Stewardship ("CSS") is authorized to issue directive to ensure compliance with the requirement of the regulators and thereafter update the PGCE and the MSC of the directive issued. All amendments to the Policy will be escalated to the Board of Directors for ratification.

## 2.0 STATEMENT OF PURPOSE

Globally, Business and Human Rights considerations are increasingly central to responsible investment, driven by evolving international standards, growing regulatory scrutiny, and rising stakeholder expectations for corporate accountability. In Malaysia, this context is particularly pertinent as the nation strives for sustainable economic growth while addressing specific challenges such as migrant worker welfare, supply chain transparency, and fair labour practices across diverse industries (Human Rights Commission of Malaysia Report, 2023).

As an investor, PNB recognises that integrating these considerations is not only a matter of ethical responsibility but also a strategic imperative. We expect companies to operate ethically and avoid involvement in conflict zones, and we systematically assess the risks associated with their operations. Companies with strong social-related frameworks exhibit lower risk profiles, enhanced brand reputation, better operational stability, and improved long-term financial performance. Neglecting Business and Human Rights issues poses significant financial and reputational risks to companies, as supply chain disruptions, regulatory scrutiny, and public perception can impact long-term value. By actively assessing and engaging with our Companies on Business and Human Rights issues, we aim to mitigate risks, foster sustainable business practices, and contribute to a more just and equitable society, ultimately enhancing value for our unitholders.

The purpose of this Policy is to establish clear guidelines and principles that direct PNB's commitment to supporting long-term sustainability of Business and Human Rights. This Policy will guide our voting decisions and engagement plans, directly supporting PNB's goal of achieving 100% alignment among priority companies with the Policy by 2030. This commitment profoundly impacts on the strength, productivity, and well-being of the workforce, and generates long-term value for shareholders. It serves as a cornerstone for PNB's stewardship role in promoting societal well-being and sustainable development.

In summary, this Policy underscores the imperative of Business and Human Rights management as a strategic investment priority. By aligning financial goals with societal well-being, PNB aims to create a more resilient, sustainable, and prosperous future for all stakeholders. PNB will undertake an active stewardship approach in line with our Stewardship Framework[1] on Business and Human Rights, guided by the escalation matrix[2], via various activism touchpoints.

1 PNB Stewardship Framework showcases PNB's stewardship philosophy and expectations for its Investee Companies, the investing public, and the general market. PNB Stewardship Framework among others guides PNB in playing its role as an active shareholder to create value and improve the performance of its Investee Companies.

2 The escalation matrix provides clarity on PNB's approach mechanisms with Investee Companies through various activism touchpoints. Further information on PNB escalation matrix can be found on PNB's official website.

## 3.0 OUR APPROACH TO BUSINESS AND HUMAN RIGHTS

PNB aims to enhance its approach to managing Business and Human Rights issues by:

- Strengthening our Business and Human Rights risk assessments in our overall investment analyses, utilising practical approaches to identify and evaluate potential impacts.

- Driving specific engagement strategies with high-priority Companies exposed to significant Business and Human Rights risks to encourage them to assess and reduce their adverse impacts.

- Continuously enhancing our own disclosures on Business and Human Rights risks and opportunities while advocating for greater transparency and robust reporting among our Companies.

- Actively exercising our voting rights to ensure companies integrate responsible practices to minimise negative impacts on Business and Human Rights, particularly where these issues are material to Companies' operations.

- Engaging with policymakers, regulatory bodies, and other stakeholders on Business and Human Rights issues to promote effective policy and greater corporate accountability.

- Participating in collaborative engagement efforts and investor statements related to fostering respect for Business and Human Rights and addressing broader social issues.

## 4.0 KEY MATERIAL ISSUES

### 4.1 PNB's Definition and Statement

PNB aims to anchor this Policy on 10 Key Material Issues, supported by 32 sub-themes identified under each issue (see Appendix), derived from recognised standards. The expectations outlined in Section 5 of this Policy will refer to the Key Material Issues as follows:

| No | Key Material Issues | Definition | Statement |
|---|---|---|---|
| 1 | **Modern Slavery** | • Situations which are exacted from exploitation where a person cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power. It includes practices such as forced labour, debt bondage, human trafficking, and slavery-like practices where people are controlled or owned by others, severely restricted in their freedom, and exploited for personal or financial gain. | • "We expect Companies to uphold zero tolerance for all forms of forced labour, modern slavery, human trafficking, and child labour in their operations and supply chains. Companies should implement robust due diligence processes to identify, prevent, and remediate any instances of modern slavery, aligning with international standards and national legislation." |
| 2 | **Diversity, Equity and Inclusion** | • Diversity – respecting individual differences within a given setting. This can include race, gender, national or social origin, ethnicity, religion, age, disability, political opinion and more.<br><br>Equity – ensuring fair treatment, access, opportunity, and advancement for all people, while striving to identify and eliminate barriers that have prevented the full participation of some groups, especially vulnerable groups such as women, children, persons with disabilities, Indigenous Peoples and migrant workers.<br><br>Inclusion – creating environments in which any individual or group can be and feel welcomed, respected, supported, and valued. This includes inclusive hiring practices, accessible facilities, and assistive technologies for persons with disabilities. | • "We expect Companies to maintain policies and practices that prevent discrimination, harassment and exclusion in the workplace. This includes ensuring fair and non-discriminatory treatment in hiring, promotion, remuneration and workplace access, and providing reasonable accommodation where required to protect the rights of vulnerable or underrepresented groups." |

| No | Key Material Issues | Definition | Statement |
|---|---|---|---|
| 3 | **Fair Wages and Benefits** | • Compliance with applicable labour and employment laws and regulations in the jurisdictions where the company operates, such as the Malaysia's Employment Act 1955, and implementing practices that go beyond legal requirements such as a living wage, provision of equitable compensation, comprehensive benefits, and flexible working arrangements that foster work-life balance and overall employee well-being. | • "We expect Companies to provide wages, benefits, rest days and leave entitlements that comply with applicable laws and safeguard workers from exploitative or unfair employment practices. Companies should ensure timely and transparent wage payment, reasonable working hours, access to required medical support, and appropriate protections for workers' health, safety and welfare. Companies should also assess wage levels against an appropriate living wage benchmark and establish a phased roadmap towards living wage implementation, taking into account sectoral, geographical and workforce-specific considerations, with transparent disclosure of progress and targets where applicable." |
| 4 | **Freedom of Association** | • Respect the right to organise and form groups for the purpose of collective bargaining and social dialogue in a healthy and fair way. | • "We expect Companies to respect workers' rights to freely associate, form, and join trade unions or other worker representative organisations of their own choosing. Companies should engage in meaningful social dialogue and collective bargaining in good faith, providing platforms for employees to voice concerns and protect their interests constructively." |

| No | Key Material Issues | Definition | Statement |
|---|---|---|---|
| 5 | **Safety and Health** | • Protection of the physical, mental and emotional well-being of all employees through a healthy occupational and environmental setting, supported by the provision of favourable working conditions. | • "We expect Companies to provide safe, healthy and hygienic working conditions, and to identify, prevent and mitigate occupational health and safety risks that may cause injury, illness or other harm to workers. Companies should maintain effective safety management systems, provide appropriate training and protective equipment, and ensure workers can raise health and safety concerns without retaliation." |
| 6 | **Upskilling and Education** | • Provision of appropriate training and skills necessary for workers to perform their roles safely, fairly and effectively, including where required to manage changes in job requirements and reduce adverse impacts from workforce transitions. | • "We expect Companies to provide workers with adequate training to perform their roles safely, fairly and competently. Where operational changes, technological shifts or restructuring may affect workers, Companies should consider appropriate training, reskilling or redeployment measures to mitigate adverse impacts on affected workers." |
| 7 | **Responsible Supply Chain** | • Management of supply chain activities that uphold fundamental Business and Human Rights, labour standards, environmental sustainability, and anti-corruption practices. | • "We expect Companies to implement rigorous due diligence throughout their supply chains to identify, assess, and address environmental and social risks, including labour and human rights issues. Companies should promote ethical sourcing, transparency, and collaborate with their suppliers to ensure responsible practices, including fair labour practices, environmental stewardship, and respect for social risks and impacts throughout the supply chain." |

| No | Key Material Issues | Definition | Statement |
|---|---|---|---|
| 8 | **Customer Welfare** | • The responsibility of businesses to avoid significant harm to the rights, safety, and well-being of their customers through ethical, transparent, and non-discriminatory business practices. | • "We expect Companies to identify, prevent, and mitigate significant harm to the safety, privacy, and well-being of their customers. This includes ensuring product safety and quality, providing clear and transparent information, upholding ethical marketing practices, protecting customer data, and maintaining effective mechanisms for customer feedback and complaint resolution to identify and address harm on an ongoing basis." |
| 9 | **Community Well-Being** | • The avoidance of significant harm to the safety, social, economic, and cultural rights of local communities that are directly or indirectly affected by business activities. | • "We expect Companies to identify, prevent, and mitigate significant harm to the rights and well-being of the communities in which they operate. This includes engaging in meaningful consultation, especially regarding FPIC where applicable, mitigating negative impacts, and maintaining ongoing engagement with community stakeholders to ensure risks are identified and managed on a continuing basis." |

| No | Key Material Issues | Definition | Statement |
|---|---|---|---|
| 10 | **Data Privacy** | • The protection and responsible management of personal information in a manner that maintains its confidentiality, ensures individuals' control over it, and safeguards their rights, dignity, and autonomy. | • "We expect Companies to implement robust policies and practices for the responsible collection, use, storage, and protection of personal data. Companies should adhere to international best practices and applicable data protection regulations, ensuring transparency with individuals about their data and safeguarding against privacy breaches and misuse." |

## 5.0 EXPECTATIONS

To implement this Policy, PNB sets forth its core expectations integral to the successful implementation of this Policy pursuant to Section 1.2. In addition, best practices are drawn as additional considerations for PNB, PNB Group and the Companies, in line with widely accepted standards, guidelines and frameworks for Business and Human Rights management.

Below are our core expectations that serve as minimum standards that we expect from the companies that we invest in.

### 5.1 Core Expectations

| No | Expectations | Description | Key Questions |
|---|---|---|---|
| **Core Expectations** | | | |
| 1 | **Policy** | • Establish a clear standalone policy which addresses Business and Human Rights issues and reflects the commitment to comply with the Key Material Issues. | • Have you developed a standalone policy which addresses Business and Human Rights?<br>• How does your policy consider all the Key Material Issues? |
| 2 | **Strategy** | • Consider Business and Human Rights in policy and strategy development, taking into account emerging standards and best practices. | • How do you incorporate Business and Human Rights considerations in your company's policy and strategy? |
| 3 | **Assessment** | • Develop and implement appropriate tools and infrastructure to facilitate and strengthen initiatives aimed at managing Key Material Issues on Business and Human Rights across the company and its value chain.<br>• Conduct periodic reviews of performance on the Key Material Issues to determine improvement opportunities and implement targeted action plans to address identified gaps. | • How do you review your performance and effectiveness of the initiatives related to Business and Human Rights? For example: risk screening tools, supplier assessments, or Social Impact Assessments ("SIA")<br>• What are the identified gaps and what are your action plans to address these?<br>• Do you have the relevant tools and infrastructure to assist the management of Key Material Issues? |

| No | Expectations | Description | Key Questions |
|---|---|---|---|
| **Core Expectations** | | | |
| 4 | **Grievance mechanism** | • Develop a formal and robust grievance mechanism for stakeholders to communicate and report on matters relating to any of the Key Material Issues on Business and Human Rights.<br>• Provide comprehensive training and awareness programmes for all workers including sub-contracted workers operating on-site to ensure they understand, can safely access and are aware of the company's grievance mechanism.<br>• Safeguards should be placed for whistleblowers. | • What channels are available for your stakeholders (e.g. employees, suppliers, unions, community groups) to report Business and Human Rights issues and how do you ensure they are aware of these channels?<br>• What processes are in place to ensure that all workers (including the sub-contracted workers) on-site are fully informed about the grievance mechanism, the various reporting channels, and that the training provided is effective and consistently applied?<br>• What are the safeguards in place to protect whistleblowers? |
| 5 | **Stakeholder engagement** | • Engage affected and potentially affected stakeholders to identify, prevent, mitigate and, where appropriate, remediate actual or potential adverse Business and Human Rights impacts.<br>• Respect the rights of Indigenous Peoples and all communities with customary land rights to give or withhold FPIC if they could be affected by planned operations. | • Do you have a process to identify and engage affected or potentially affected stakeholders, including employees, suppliers, unions and community groups, to inform the assessment, mitigation and remediation of Business and Human Rights risks?<br>• How do you identify and engage local communities that may be affected by Business and Human Rights risks linked to your operations, and what mechanisms do we have in place to gather and respond to their feedback? |

| No | Expectations | Description | Key Questions |
|---|---|---|---|
| **Core Expectations** | | | |
| | | • Proactively engage with all communities that are or may be impacted by Business and Human Rights risks or violations linked to the company's operations and undertake effective mitigation actions to address these impacts. | • What mitigation or remediation actions do we currently implement to address potential or actual Business and Human Rights impacts, and how do we measure effectiveness? |

## 5.2 Best Practices

| No | Expectations | Description | Key Questions |
|---|---|---|---|
| **Best Practices** | | | |
| 1 | **Human Rights Due Diligence ("HRDD")** | • Conduct HRDD on material and high-risk operational segments or assets to identify and manage potential human rights impacts and enhance existing monitoring systems.<br>• Identify, address, and monitor Business and Human Rights risks related to Key Material Issues throughout the value chain, ensuring these considerations are fully integrated into procurement policies, risk monitoring and decision-making. | • How effectively do you identify, address, and monitor Business and Human Rights risks in your procurement practices?<br>• Have you identified operational segments or assets with high-risk of Business and Human Rights violations? And is it worth conducting HRDD to address these risks?<br>• Do you have a process to regularly assess potential Business and Human Rights impacts as these risks evolve? |

## 6.0 CONCLUSION

We believe that by adopting and actively implementing this Policy, PNB reinforces its commitment to responsible stewardship and the management of Business and Human Rights risks. We remain focused on translating this Policy into effective implementation, addressing controversies through appropriate escalation and engagement, and encouraging companies to maintain safeguards that prevent, mitigate and address adverse impacts on workers, customers, communities and other affected stakeholders. A robust approach to Business and Human Rights is essential to protecting long-term value and reducing exposure to material social risks. This Policy will be reviewed periodically to ensure its continued relevance and alignment with evolving legal, regulatory and international standards, as well as emerging Business and Human Rights risks and expectations.

## APPENDIX – ABBREVIATIONS

The table below sets out the abbreviations used throughout this Policy for ease of reference.

| Term | Description |
|---|---|
| BHR | Business and Human Rights |
| DEI | Diversity, Equity and Inclusion |
| FPIC | Free, Prior and Informed Consent |
| GRI | Global Reporting Initiative |
| HRDD | Human Rights Due Diligence |
| ILO | International Labour Organisation |
| KMI | Key Material Issues |
| NAPBHR | National Action Plan on Business and Human Rights |
| OECD | Organisation for Economic Co-operation and Development |
| PNB | Permodalan Nasional Berhad |
| SIA | Social Impact Assessment |
| UNDP | United Nations Development Programme |
| UNGC | United Nations Global Compact |
| UNGP BHR | United Nations Guiding Principles on Business and Human Rights |
| UNPRI | United Nations Principles for Responsible Investment |
| UNSDG | United Nations Sustainable Development Goals |

## APPENDIX – DEFINITIONS OF THE TEN KEY MATERIAL ISSUES AND THE 32 SUB-THEMES

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|---|---|---|
| 1. | Modern Slavery | Situations which are exacted from exploitation where a person cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power. It includes practices such as forced labour, debt bondage, human trafficking, and slavery-like practices where people are controlled or owned by others, severely restricted in their freedom, and exploited for personal or financial gain. |
| 1.1 | Abuse of Vulnerability | Exploiting an individual's susceptibility or weakness for personal gain, often through coercion or manipulation. |
| 1.2 | Deception | Deliberately misleading or tricking someone for personal or economic gain, often by providing false information or promises. |
| 1.3 | Restriction of Movement | Imposing limitations on an individual's freedom to move or travel, often as a means of controlling their actions or opportunities. |
| 1.4 | Isolation | Separating an individual from social contact, support networks, or external influences, often to maintain control or prevent help-seeking behavior. |
| 1.5 | Physical and Sexual Violence | Inflicting harm or coercion through physical force or sexual acts without consent, leading to physical or psychological trauma. |
| 1.6 | Intimidation and Threats | Using fear-inducing tactics or explicit warnings to control or manipulate someone's behavior or choices. |
| 1.7 | Retention of Identity Documents | Confiscating or withholding personal identification documents (such as passports or identification cards) to limit an individual's ability to leave or assert their rights. |
| 1.8 | Withholding of Wages | Refusing to pay an employee the agreed-upon wages or salary for work performed, often as a means of control or exploitation. |
| 1.9 | Debt Bondage | Enslaving individuals through debt, where they are forced to work to repay a debt that may never be fully cleared, trapping them in a cycle of exploitation. |
| 1.10 | Abusive Working and Living Conditions | Subjecting individuals to harsh, unhealthy, or unsafe environments in their places of work or residence, often without adequate protection or recourse. |
| 1.11 | Excessive Overtime | Compelling individuals to work beyond legal or reasonable limits, often without proper compensation or rest, which can lead to physical and mental exhaustion, and negatively impact their health and well-being. |
| 1.12 | Against Human Trafficking | The recruitment, transportation, transfer, harboring, or receipt of individuals often across international borders through force, coercion, abduction, deception, fraud, abuse of power, or exploitation of a position of vulnerability. |

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| 1.13 | Against Any Form of Child Labour | Work that is harmful to children and interferes with their education. This includes any work that is too dangerous or demanding for children and deprives them of their right to go to school. The worst forms include slavery, forced labour, child trafficking, and exploitation in illegal activities. |
| 2. | Diversity, Equity and Inclusion | Diversity – respecting individual differences within a given setting. This can include race, gender, national or social origin, ethnicity, religion, age, disability, political opinion and more.<br><br>Equity – ensuring fair treatment, access, opportunity, and advancement for all people, while striving to identify and eliminate barriers that have prevented the full participation of some groups, especially vulnerable groups such as women, children, person with disabilities, Indigenous Peoples and migrant workers.<br><br>Inclusion – creating environments in which any individual or group can be and feel welcomed, respected, supported, and valued. This includes inclusive hiring practices, accessible facilities, and assistive technologies for persons with disabilities. |
| 2.1 | Non-Discrimination | Treating individuals fairly in employment or social life, ensuring equality of opportunity and prohibiting any distinctions, exclusions, or preferences based on race, gender, or other characteristics that impair equality, while recognising inherent job requirements and providing inclusive access to employment opportunities. |
| 2.2 | Gender Equality | The principle of providing equal opportunities for women and men to achieve decent and productive work in an environment of freedom, equity, security, and human dignity, which include promoting fundamental rights at work, creating better employment and income opportunities, enhancing social protection coverage, and strengthening social dialogue and tripartism. |
| 3. | Fair Wages and Benefits | Compliance with applicable labour and employment laws and regulations in the jurisdictions where the company operates, such as the Malaysia's Employment Act 1955, and implementing practices that go beyond legal requirements such as a living wage, provision of equitable compensation, comprehensive benefits, and flexible working arrangements that foster work-life balance and overall employee well-being. |
| 3.1 | Rest Days and Leaves | Ensure that employees receive adequate time off and sufficient rest days to recharge and maintain their well-being. Organisations that exceed legal requirements not only provide statutory leave but also offer additional paid leave options, such as wellness leave and parental leave, thereby fostering a supportive work environment that prioritizes employee health and work-life balance. |

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| 3.2 | Medical and Insurance | Comprehensive health coverage protects employees against medical expenses and promotes their overall well-being. Organisations that exceed these requirements offer additional health insurance plans, preventive health programs, and mental health resources, ensuring that employees have access to essential care and support. |
| 3.3 | Flexible Working Arrangement | Allowing employees to tailor their work schedules to better fit their personal and professional commitments. Practices that go beyond legal requirements would include options such as remote work, adjustable hours, and job-sharing, thereby accommodating diverse employee needs. |
| 3.4 | Living Wage | The income needed for a person or family to achieve a decent standard of living, covering essential expenses such as adequate food, clean water, housing, education, healthcare, transportation, clothing, and other essential needs, as well as financial provision for unexpected events and enabling meaningful participation in society, personal and family development, and freedom from severe financial stress. This wage should be reflective of the specific sector considerations, local economic conditions, cost of living, as well as country and geographical circumstances. |
| 4. | Freedom of Association | Respect the right to organise and form groups for the purpose of collective bargaining and social dialogue in a healthy and fair way. |
| 4.1 | Forming Groups | Employers have the right to freely establish and join organisations, draft their own constitutions, elect representatives, and organise activities without interference from public authorities, ensuring the protection of labour rights, including collective bargaining. |
| 5. | Safety and Health | Protection of the physical, mental and emotional well-being of all employees through a healthy occupational and environmental setting, supported by the provision of favourable working conditions. |
| 5.1 | Safe Working Conditions | Work environments that are free from physical, chemical, biological, ergonomic, and psychosocial hazards that could cause injury, illness, or harm to workers. It encompasses the protection of workers' health and safety through adequate safety measures, regulations, and training, as well as the provision of appropriate protective equipment. |
| 5.2 | Encourage Wellness | Promoting the physical, mental, and social well-being of workers, extending beyond just the absence of disease or injury, which includes initiatives related to work-life balance, mental health support, stress management, nutrition, and fitness, as well as creating an environment that fosters overall well-being. |
| 5.3 | Accessibility for Persons with Disabilities | Creating and providing improved tools, benefits, inclusive and favorable working environments that support those with disabilities and encourage positive outcomes. This could include offering clean, accessible workspaces, ergonomic equipment, assistive technologies, and strategies or rewards to enable persons with disabilities to thrive in their roles and reach their full potential while enhancing team productivity. |

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|---|---|---|
| 6 | Upskilling and Education | Provision of appropriate training and skills necessary for workers to perform their roles safely, fairly and effectively, including where required to manage changes in job requirements and reduce adverse impacts from workforce transitions. |
| 6.1 | Training | Continuous development of skills, knowledge, and competencies that empower individuals to thrive in the workplace and contribute to sustainable economic growth. This includes formal and informal education, vocational training, and lifelong learning opportunities aimed at enhancing employability, adaptability, and personal development. |
| 7 | Responsible Supply Chain | Management of supply chain activities that uphold fundamental human rights, labour standards, environmental sustainability, and anti-corruption practices. |
| 7.1 | Ethical and Responsible Sourcing | Committing to sourcing materials and products in a manner that upholds ethical standards, including fair labour practices, environmental stewardship, and respect for human rights throughout the supply chain. |
| 8 | Customer Welfare | The responsibility of businesses to avoid significant harm to the rights, safety, and well-being of their customers through ethical, transparent, and non-discriminatory business practices. |
| 8.1 | Access and Affordability | Ensuring that companies do not unfairly deny or restrict access to essential goods and services for underserved customers and marginalised groups, avoiding practices that create discriminatory or exclusionary barriers to access. |
| 8.2 | Product Integrity and Consumer Protection | Protecting customers from fraud, exploitation and unfair trade practices while ensuring highest standards of product quality, safety and transparency. |
| 9 | Community Well-Being | The avoidance of significant harm to the safety, social, economic, and cultural rights of local communities that are directly or indirectly affected by business activities. |
| 9.1 | Conflict-Affected Communities and Risks | Managing heightened human rights risks in conflict-affected areas through enhanced due diligence, including SIA and meaningful engagement with affected stakeholders in line with FPIC. |
| 9.2 | Community Impact | Ensuring that business activities do not result in significant harm to the socio-economic well-being of affected communities, by identifying and avoiding negative impacts on residents' quality of life, safeguarding community resilience, and upholding the rights of these communities throughout the course of business operations. |
| 9.3 | Cultural Preservation | Recognising and respecting the rights of local and Indigenous Communities to preserve their cultural heritage, traditions and identity. This includes safeguarding customs, arts, historical sites, lands and resources to ensure cultural values are sustained for future generations. |

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|---|---|---|
| 10 | Data Privacy | The protection and responsible management of personal information in a manner that maintains its confidentiality, ensures individuals' control over it, and safeguards their rights, dignity, and autonomy. |
| 10.1 | Data Security | Ensuring that personal and sensitive data is protected from unauthorised access, breaches, or misuse through robust security measures and practices that safeguard customer information. |
| 10.2 | Ethical Data Use | Utilising data in a manner that is ethical and respects individuals' privacy, including obtaining informed consent for data collection, ensuring transparency in data practices, and using data responsibly to avoid harm or exploitation. |