

TMC Life Sciences Berhad

CHILD AND FORCED LABOUR POLICY

Process Owner: Group Human Resources

Last updated: 1 September 2025

1.0 PURPOSE

The purpose of this policy is to explicitly prohibit any form of child labour and forced labour within a company or organization, outlining clear procedures to identify, prevent, and address such practices, ensuring compliance with legal standards and ethical principles to protect vulnerable workers and uphold human rights.

2.0 SCOPE

This policy covers the requirements and guidelines concerning Child and Forced Labour policy. It is applicable to all Employees at Thomson Hospitals Sdn. Bhd (THSB), branches and subsidiaries of TMC Life Sciences Berhad (TMCLS).

3.0 DEFINITION

3.1 Child Labour Policy

Under the Children and Young Person (Employment) Act 1966 (Act 350), listed below are the definition stated herein.

- 3.1.1 'Child' means any person who has not completed his / her **fifteen years of age**.
- 3.1.2 'Contract of Service' means any agreement, whether oral or in writing and whether express or implied, whereby a person agrees in accordance with the provisions of this Act to employ a child or young person and that child or young person agrees to serve him and includes an apprenticeship contract.
- 3.1.3 'Employ' and 'Employment' means employment in any labour for the purposes of gain, whether the gain be to a child, young person or to any other person.
- 3.1.4 'Employer' means any person who has entered into a contract of service to employ any child or young person and includes the agent, manager or factor of such first-mentioned person.
- 3.1.5 'Guardian' in relation to child or young person, includes any person who, in the opinion of the court having cognizance of any case in relation to the child or young person or in which the child or young person is concerned, has for the time being the charge of or control over the child or young person.
- 3.1.6 'Young person' means any person who, not being a child, has not completed his/her **eighteen years of age**.

3.2 Forced Labour Policy

- 3.2.1 According to International Labour Organisation (ILO) Convention No.29, 'Forced or Compulsory Labour' is defined as all work or service which is extracted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

- 3.2.2 This definition includes the most common forms of forced or compulsory labour such as:
- i. Deception;
 - ii. Isolation;
 - iii. Intimidation and threats;
 - iv. Abuse of vulnerability;
 - v. Excessive overtime;
 - vi. Retention of identify documents i.e. passport or National Registration Identity Card (NRIC);
 - vii. Abusive of working and living conditions;
 - viii. Physical and sexual violence;
 - ix. Debt bondage; and/or
 - x. Human trafficking.

4.0 GENERAL PRINCIPLE

POLICY STATEMENT

TMCLS and its subsidiaries endeavours to provide a conducive working environment that is characterised by equality and mutual respect. The Company shall have a strict 'zero tolerance' policy towards child and force labour in all its operations. We shall not tolerate the use of child, nor exploitation of children in any of the employment activities. We shall comply with the employment law involving children and youths and adhere to all applicable local and international laws and standards related to child and forced labour.

Guidelines:

4.1 INTRODUCTION

- 4.1.1 The Group Human Resources (GHR) shall be the custodian of the Central Policy (CP) pertaining to the Child and Forced Labour Policy. It is the responsibility of every Company's stakeholder to adhere to this policy.
- 4.1.2 TMCLS Group (The 'Company' or 'TMC Life Sciences Berhad') includes all subsidiaries whether wholly or partially owned by TMC Life Sciences Berhad, and any Employee, whether employed on a full time and / or contractual and / or part time basis with any subsidiaries of TMC Life Sciences Berhad.

4.2 PRINCIPLE OF CHILD AND FORCED LABOUR

- 4.2.1 The Child and Forced Labour Policy ('Central Policy') shall provide the principle and guidelines against child and forced labour which shall be incorporated into the processes and decision making of the Group and relevant parties within the scope of the Central Policy (CP). The CP also outlines the framework for addressing child and forced labour.

- 4.2.2 In the conduct of its business, TMCLS will not employ children that falls into the definition stipulated by International Labour Organization (ILO) Convention, notwithstanding any national law or local regulation.
- 4.2.3 TMCLS is committed to ensure that the Company complies with the Children and Young Persons (Employment) Act 1966 to prevent any child labour and forced labour in the organisation.
- 4.2.4 TMCLS will comply with all other applicable child labour, employment laws and regulations i.e., Employment Act 1955 (Amendment) 2022, Minimum Wages Order 2022, including those related to wages, hours worked, overtime and working conditions.
- 4.2.5 TMCLS **prohibits** any activities that involve or support child labour in the Group. We are against all forms of exploitation of children. The Company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities. However, any employment involving children and youth shall comply with the Children and Young Person (Employment) Act, 1966.
- 4.2.6 For preventive measures, the Company reliably be verifying the age of employment candidates is mandated in the hiring / recruitment process in TMCLS group of companies. A copy of any identification documents i.e. National Registration Identification Card (NRIC) for age verification must be retained in the employee personal folder throughout the period of employment.
- 4.2.7 The Company expects its business partners, vendors, and suppliers to have and uphold similar standards and abide the rules and regulations. All external parties having business dealings or service engagements with TMCLS group of companies shall be expected to be **free of child labour** in their activities. TMCLS shall reserves the right to terminate business relationship with any party found to have engaged or promoting child labour and failed to rectify them within reasonable time from date of recovery.
- 4.2.8 The Company shall retain the right and discretion to review and amend the terms of this Policy to keep the same updated at all material times.

4.3 RISK MANAGEMENT / RISK MITIGATION

- 4.3.1 To practise 'due diligence' on all our operations and suppliers to identify any potential risks of child labour. This shall include the compliance of Children and Young Person (Employment) Act, 1966 and the preventive measure taken as per clause 4.2.5 and 4.2.6.
- 4.3.2 A strong focus on fair labour practices and the well-being of our employees shall be maintained through GHR policies and procedures and the employment law practices.
- 4.3.3 Any employee of TMC Life Sciences Berhad may report case of actual or suspected violation to:
- i. Group Chief Human Resource Officer; or
 - ii. Assistant Director, Group Human Resource; or
 - iii. Senior Manager, Group Human Resource