

PHARMANIAGA BERHAD

Name of Policy	Workplace Bullying	
Companies	Pharmaniaga Berhad & Subsidiary Companies	
Scope	All employees, directors and board members, and to workers such as agency staff, casual staff or contractors who are not engaged on contract but are undertaking work on behalf of the Company, inside and outside of working hours.	
Version	2.0	Effective Date: 24 May 2024

1.0 POLICY STATEMENT

- 1.1** The Company is committed towards ensuring a conducive workplace for all employees where all employees are treated with dignity and respect, irrespective of rank, level or position in line with the Company's Core Values of **RESPECT, INTEGRITY, TEAMWORK and EXCELLENCE**. The Company's commitment includes ensuring a work environment that is free from any form workplace bullying.
- 1.2** This policy shall apply to all employees of the Company. This policy shall also complement the Company's Code of Ethics and Conduct (hereinafter referred to as the Code), specifically Clause 4.9 (General Conduct) and Clause 6 (Code of Ethics and Conduct Procedures and Guidelines) of the Code.
- 1.3** The Company views cases of bullying at the workplace seriously and any valid and proven cases will be subject to the appropriate disciplinary action, consistent with Clause 4.9 (General Conduct) of the Code and Clause 6 (Code of Ethics and Conduct Procedures and Guidelines) of the Code.

2.0 OBJECTIVE OF THE POLICY

- 2.1** This Policy is to determine the definition, roles, responsibilities and grievance procedures in ensuring working environment is free from any form of workplace bullying.

3.0 DEFINITION OF BULLYING

- 3.1** For the purpose of this policy, bullying is defined as an unreasonable action or behaviour that demeans, intimidates, offends, humiliates and/or causes fear to other employees either as individuals or as a group.
- 3.2** Such actions or behaviours may consist of a single incident, a sporadic event or a continuing process.
- 3.3** The Company acknowledges that acts of bullying may be perpetrated by any employee irrespective of position. However, employees in position of trust and authority have the added responsibility to ensure that they do not abuse their position.

3.4 Examples of acts of bullying include but are not limited to the following: -

- a. Derogatory or offensive name calling.
- b. Making verbal abuse against the employee.
- c. Making threats against the employee.
- d. Using offensive language against the employee.
- e. Embarrassing, ridiculing and/or belittling another employee.
- f. Deliberately ignoring, isolating or excluding the employee from normal work interactions and/or workplace activities.
- g. Using one's position to ask and/or demand for favours, including personal favours, from the employee.
- h. Inciting others to do any of the above.

4.0 ROLES AND RESPONSIBILITIES

4.1 All parties are responsible for ensuring that any form of workplace bullying is prevented by: -

- a. Ensuring that they are familiar with this policy and of actions and behaviours that constitute bullying and ensuring that they adhere to the policy at all times.
- b. Ensuring that employees under their supervision, where applicable, are similarly familiar with this policy and of actions and behaviours that constitute bullying.
- c. Leading by example and ensuring that bullying does not occur at the workplace.

5.0 GRIEVANCE PROCEDURES

5.1 Lodging a Grievance Complaint

- a. Employees who feel that they are subject to any form of workplace bullying may bring up their grievance to their superiors and/or line managers and/or to their respective Human Capital Management by completing the Grievance Complaint Form (*Appendix 1*). However, if the grievance is against the employee's own superiors and/or line managers, employees may direct their grievance to the Group Human Capital Management.
- b. Employees who witness acts of bullying are also to report such incidents to their superiors and/or line managers or to the respective Company's Human Capital Management. However, if the acts of bullying involve their own superiors and/or line managers, the complaint may be lodged directly to the Group Human Capital Management Department, similarly by completing the Grievance Complaint Form (*Appendix 1*).
- c. Employees and/or witnesses who intend to lodge report of workplace bullying and would like to be protected from reprisal, discrimination or victimization for the disclosure made in good faith and with sound judgement to avoid baseless allegations can also lodge through the following channels:
 - i) E-mail to;
 - a) Senior Independent Director
 - b) Chairman of Audit Committee
 - c) whistleblow@pharmaniaga.com
 - ii) Whistleblowing hotline: 1-800-18-2082
 - iii) In the event that the disclosure relates to any of the parties as per Item i) above, the Group's Divisional Directors or Board of Directors, the disclosure may be made directly to the Employee & Industrial Relations Unit at eir@pharmaniaga.com.

5.2 Actions to Resolve a Grievance Complaint

Superiors and/or line managers receiving such complaint from their employees shall expediently investigate and where applicable, resolve the complaint lodged by the employee. This may include interviews, discussions and counselling sessions with the complainant and/or other involved parties to find a resolution to the complaint.

In the event that the superiors and/or line managers is unable to address and/or resolve the complaint at his level, he shall bring up the complaint to the respective Company's Human Capital Management and/or the Group Human Capital Management Department as soon as possible.

Upon receipt of the complaint either directly from the employee or referred by the superior and/or line manager, the Company's respective Human Capital Management/Group Human Capital Management Department will expediently investigate, determine the validity of the complaint and work towards finding a resolution to the complaint. This may include interviews, discussions and counselling sessions with the complainant and/or other involved parties to find a resolution to the complaint.

Disciplinary actions will be taken against the parties involved if deemed appropriate and/or necessary, in line with the Company's Disciplinary Procedures and Guidelines.

6.0 RELATED POLICIES, PROCEDURES AND GUIDELINES

6.1 Reference is made to the following: -

- a. Code of Ethics and Conduct
- b. Disciplinary Procedures and Guidelines
- c. Grievance Procedures
- d. Other relevant rules, regulations, memo and circulars issued by the Company from time to time

- This portion is intentionally left blank -

Grievance Complaint Form
Borang Kilanan

Appendix 1

Employee Name

Nama pekerja

Position

Jawatan

ID No

No. ID

Date

Tarikh

Part 1 / Bahagian 1 : Employee report/Laporan pekerja (Attach if any additional info)

Part 2 / Bahagian 2 : Action / Tindakan

Action taken by,
Tindakan diambil oleh,

Name :

Name

Designation :

Jawatan

Part 3 / Bahagian 3 : Affirmation / Pengesahan

For HCM Department Purpose Only / Untuk kegunaan Jabatan Modal Insan sahaja

Settled / *Selesai* : Yes / *Ya* () No / *Tidak* ()

Tick (✓) where applicable / *Tandakan yang bersesuaian*

Remark :

Date :

Tarikh