



Policy

-

Human Rights

Table of contents

A. OBJECTIVE	3
B. POLICY SCOPE	3
C. POLICY CONTENT	3
1. HUMAN RIGHTS RISKS AT LINK	3
2. KEY AREAS OF FOCUS	4
3. MONITORING AND REPORTING	6
4. REVIEW OF THIS POLICY	6

A. Objective

- Link (“The Group”, “Link” and “We” will be used interchangeably hereafter) is committed to respect human rights of everyone and believes all our stakeholders should be treated with dignity, fairness and respect. The Group upholds ethical business conduct, compliance with applicable laws, regulations and policies in all jurisdictions of our operations.
- Human Rights Policy (“This Policy”) outlines Link’s commitment in respecting human rights (and stance against modern slavery) and sets out the standards of conduct that are expected to be followed and adopted at Link.

B. Policy Scope

- This Policy is formulated with reference to internationally recognised human rights principles from the International Labour Organisation’s Declaration on the Fundamental Principles and Rights at Work, United Nations Guiding Principles on Business and Human Rights.
- This Policy is aligned with our Code of Conduct and applies to our employees at all levels within Link. The Group also requires our business partners and suppliers to uphold human rights principles and adopt similar policies within their business operations in accordance with Link’s Supplier Code of Conduct.
- This Policy is approved by the Systems and Control Committee and endorsed by the Executive Directors with Board oversight. The day-to-day responsibility for the administration of the Policy is delegated to the department leads, who are required to notify the Investigation Committee formed under the Whistleblowing Policy of such reportable conduct periodically and as appropriate.

C. Policy Content

1. Human Rights Risks at Link

- Link has been a staunch supporter of the United Nations of Global Compact (UNGC) since 2012 and strives to adhere to all of the Ten Principles, reaffirming our commitment to respect labour standards and human rights, to operate in an environmentally responsible manner and to maintain zero tolerance towards corruption.
- The Group acknowledges that human rights risks (including modern slavery risks) may present within Link’s direct operations and supply chain, and is committed to identify those risks through engaging with our stakeholders and responds with appropriate remediation.
- At Link’s direct operations, our employees are skilled white-collar and management professionals. The risk of human rights (including modern slavery) issues is considered low and a number of policies and procedures are in place for control and mitigation.
- At the supply chain level, the Group considers there to be a higher risk of human rights (including modern slavery) issues as a result of the use of contract/subcontract labour and third-party labour agencies, a highly competitive business market, suppliers’ operations and procurement of specific materials in countries with weaker commitments to human rights and labour standards.

2. Key Areas of Focus

2.1 Equal Opportunity, Diversity and Inclusion

- The Group is committed to creating an equitable, inclusive and supportive workplace environment. Our business is conducted in a manner that embraces diversity and nurtures upward social mobility for our diverse talent including those among vulnerable and underprivileged groups.
- The Group is a signatory of The Women's Empowerment Principles and is committed to implementing of the principles at all levels of our business.
- All employees are fairly and equally treated with respect and dignity. Any form of discrimination on the basis of gender, race, nationality, age, sexual orientation, marital/family status, pregnancy, religion, disability, political opinions, or other similar factors shall not be tolerated in the workplace or in any employment activities, such as hiring, assignments, promotion, compensation, discipline and termination.
- All employees are expected to treat others with respect, any type of harassment, intimidation and violence in terms of physical, verbal, or sexual are strictly prohibited. Board diversity encompasses not only gender, ethnicity or age but also business experience, skill sets, knowledge and professional expertise.
- A balanced and diversified Board brings a broad range of views which helps discussion and critical decision-making, and balances against "group thinking". Assisted by the Nomination Committee, the Board reviews annually the Board Diversity Policy of Link and monitors progress towards diversity.

2.2 Forced and Compulsory Labour

- The Group strictly prohibits all forms of forced and compulsory labour, including child labour and illegal immigrants, and forbids any form of human trafficking or modern slavery in our operations and supply chains in compliance with applicable employment laws and regulations.
- Staff who are younger than the minimum legal working age must not be employed. In jurisdictions where youth apprenticeships are relevant, the Group shall ensure compliance with applicable employment laws and regulations.

2.3 Freedom of Association and Collective Bargaining

- The Group respects employees' civil liberties, individual freedom of association and rights to collective bargaining in compliance with local laws and regulations.
- The Group upholds the rights of employees to participate in trade unions and associations of their choice in compliance with local laws and regulations.

2.4 Compensation and Working Hours

- The Group operates in full compliance with applicable laws and regulations on working hours, holidays, remuneration and benefits.
- The Group must enter into written employment contracts with their employees and. Wages, benefits, pay structures, and pay periods shall be communicated clearly and executed

promptly. We also require our suppliers to uphold and adopt relevant employment standards.

- The Group supports healthy working culture and work-life balance and implements initiatives to discourage and reduce excessive working hours.
- The Group shall grant employees mandatory rest days, annual leaves, sick leaves, and maternity or paternity leaves as stipulated by local laws without any form of repercussions.

2.5 Workplace Health and Safety

- The Group is committed to promoting strong safety culture, maintaining safe working environments, and continually improving performance in these areas. A set of guidelines and policies are formulated i.e. Occupational Health and Safety Policy, to ensure that our daily operations are conducted in a manner that safeguards the safety, health and well-being of all our stakeholders.
- The Group must apply and obtain all necessary occupational health and safety permits/licenses that remain valid during operations.
- Facilities and amenities such as potable water, sanitary facilities, fire safety, ventilation, and lighting shall be provided and shall meet the legal requirements of a healthy and safe workplace.
- All employees should understand the obligations of safeguarding well-being and safety for themselves and other related parties during work. Regular training and adequate resources shall be provided along when suppliers communicate their own health and safety policies and management systems to staff.
- The Group shall identify, monitor, and minimise occupational risks resulting from their operations and adopt follow-up actions after accident/incident investigation where needed.

2.6 Human Capital Development

- The Group has an overarching Remuneration Policy and Strategy to ensure our overall compensation components and other benefits remain competitive. We regularly review our talent strategy, workforce planning, total reward programmes and learning and development initiatives.
- The Group is committed to employee career and personal development, ensures equal opportunities for career advancement and provides at least 16 hours of training annually for all employees.
- The Group is committed to conducting engagement surveys regularly, covering all employees at Link.

2.7 Community and Collaboration

- The Group supports the development of fair labour standards and regularly participates in industry/topic-specific initiatives and forums
- The Group supports the development of opportunities and upward social mobility for local underprivileged groups by executing and participating in relevant initiatives.

3. Monitoring and Reporting

- The Group will engage with our employees and stakeholders on human rights issues through contractual requirements, grievance and whistleblowing mechanisms.
 - Relevant trainings and assessment are conducted to avoid and prevent Human Rights issues. Regular policy and procedures training includes but is not limited to training on this Policy, the Procurement Policy and Code of Conduct. Supplier compliance review is also in place to assess and ensure our suppliers are complying with applicable regulations and labour standards.
 - The Group shall identify, monitor, and rectify any activities that have fallen below the standard of this Policy as soon as possible and ensure their continued compliance.
 - In accordance with our Whistleblowing Policy, a designated communication channel has been set up for employees to report any forms of discrimination, harassment, grievances, conflicts and breaches, in which disciplinary actions and/or employment termination could result.
 - Reported concerns will be reviewed and investigated by Link's Investigation Committee, which is delegated by the Audit and Risk Management Committee ("ARMC") to handle whistle-blowing complaints received by Link. The Investigation Committee formed under the Whistleblowing Policy reports to the Management and ARMC periodically or when deemed necessary.
 - Link will protect and support anyone who reports genuine matters of concern. All matters will be treated in the strictest confidence unless superseded by legal requirements.
 - Human rights risk and impact factors are incorporated into our enterprise risk management system, with regular review and reporting to our ARMC. We will take appropriate mitigation measures would be taken in a timely manner where applicable.
 - Key performance indicators are set to keep track of our human capital development. The Group will report on relevant metrics and any identified incidents which are audited by an external verifier on an annual basis through our Annual Reports and Sustainability Compendium.
- ## **4. Review of this Policy**
- This Policy will be regularly reviewed considering legislative changes, organisational changes, and development in industry best practices, or at a minimum, every three years.
 - Requisite changes will be proposed and reviewed by the Sustainability and Risk Governance Department, and endorsed by the Sustainability Committee.