

THE KINGSBURY PLC

HUMAN RIGHTS POLICY

1. PURPOSE

Human Rights outline and focus on protection to people from severe political, legal, and social abuses. Thus, it is of relevance that aspects and areas of Human Rights are seriously addressed in all our operations.

2. SCOPE

The Kingsbury PLC is committed to fostering an organisational culture which supports internationally recognised human rights and seeks to prevent abuse of human rights. We support the principles contained within the Universal Declaration of Human Rights and the United Nations Global Compact (UNGC).

We commit to the following two sub- principles of the UNGC Principles of Human Rights;

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: Make sure that they are not complicit in human rights abuses.

3. POLICY GOVERNANCE AND RESPONSIBILITY

No.	Job title	Responsibility
1	Overall responsibility for the implementation of this policy department-wide	Group ESG
2	Conducting an annual training and assessment of a broad range of human rights issues utilizing an international level benchmark	Group ESG

4. SOCIAL POLICIES

No.	Job title	Responsibility
3	A Report and Gap Analysis to manage any areas of improvement	Group ESG
4	Awareness building and communication of policy to employees	Group HR/Group ESG
5	Recording and reporting the latest indicators of management performance directed by the GRI (Global Reporting Initiative) framework <ul style="list-style-type: none"> ◆ instances where Human Rights have been violated ◆ percentage and total number of significant investment agreements and contracts that include human rights clauses or that have undergone human rights screening ◆ percentage of significant suppliers, contractors, and other business partners that have undergone human rights screening, and actions taken 	Group ESG and Sector Lifecode Champions

	<ul style="list-style-type: none"> ◆ operations and significant suppliers identified in which the right to exercise freedom of association or collective bargaining may be violated or at significant risk, and actions taken to support these rights ◆ operations and significant suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour ◆ any measures taken to contribute to the elimination of all forms of forced or compulsory labour. ◆ percentage of security personnel trained in the organisation’s policies or procedures concerning aspects of human rights that are relevant to operations ◆ Instances of discrimination and corrective actions taken thereafter other business partners that have undergone human rights screening, and actions taken ◆ operations and significant suppliers identified in which the right to exercise freedom of association or collective bargaining may be violated or at significant risk, and actions taken to support these rights ◆ operations and significant suppliers identified as having significant risk for incidents of child labour, and measures taken to contribute to the effective abolition of child labour ◆ any measures taken to contribute to the elimination of all forms of forced or compulsory labour. ◆ percentage of security personnel trained in the organisation’s policies or procedures concerning aspects of human rights that are relevant to operations ◆ instances of discrimination and corrective actions taken thereafter 	
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5. POLICY STATEMENT

Commitments to stakeholders

Employees: We treat all of our employees with respect and dignity and promote diversity in the workplace. Our aim to achieve uniform application of relevant principles underlined in the Universal Declaration of Human Rights is derived from our commitment to respect the rights of our employees, which include labour and working conditions. We are committed to train our employees to be aware of, respect and protect human rights in the workplace and in the local communities directly impacted by our operations.

Business Partners: Our commitment applies to workers directly engaged by the company and workers engaged through third parties to perform work related to core business processes for a substantial duration (contracted workers operating within company premises as well as suppliers, joint venture partners and clients/customers), through proactive engagement, monitoring and contractual provisions.

Local Communities: Where relevant, we engage with local communities on any actual or potential human rights impacts of our operations, which also include land and property acquisition and security arrangements. The Kingsbury PLC practices human rights in accordance with the customs, cultures and values portrayed by these communities.

6. PROVISIONS ON HUMAN RIGHTS

Fair Treatment

We provide equality of opportunity and treatment for the purposes of eliminating discrimination based on race, colour, gender, sexual orientation, gender identity, religion, political opinion, nationality, social origin and status, disability, age or other status of individuals unrelated to their ability to perform work. Salaries are on par across all positions at the Group, sans any gender bias. Salary distinctions are based solely upon factors such as performance and market comparisons for the relevant skill group. The Kingsbury PLC aims to pay competitive wages based on local market assessments.

Non-harassment

The Kingsbury PLC commits to promote a work environment free of any form of workplace harassment including physical, verbal, sexual or psychological harassment, abuse, and threats, as defined by the laws of each country in which we operate. To protect workers against such acts, The Kingsbury PLC has implemented prevention policies, facilitates open communication, provides training, and allows workers to report incidents of harassment to a complaint mechanism that fully investigates the reports and responds accordingly.

Abolishing Child, forced and compulsory Labour

In Sri Lanka, the law defines children as below the age of 14 years. The Kingsbury PLC opposes child labour, does not employ any person under the age of 18, and works with business partners to ensure that zero instances of child labour are recorded in the supply chain as defined by national laws. We oppose all forms of forced or compulsory labour and work hand in hand with subcontractors and suppliers to ensure illegal forms of employment are eradicated.

Hours, wages and leave

The Kingsbury PLC works within the standards set by national law and respects the standards set by the International Labour Organisation (ILO). We provide a living wage that enables workers to meet the basic needs of themselves and their dependents, ensures that workers are provided leave in accordance with national standards and ensures that all workers have an official employment status.

Freedom of association/collective bargaining

The Kingsbury PLC believes in employees engaging in dialogue with the company on any issue they may wish to voice and seek redress on.

Promoting health and safety

The Kingsbury PLC commits to providing safe and healthy working facilities and takes appropriate precautionary measures to protect employees from work-related hazards and anticipated dangers in the workplace. Safety precautions depend upon and are relevant to the industry, company concerns and the needs of vulnerable workers and meet or exceed the laws of each country in which we operate. The Kingsbury PLC ensures that workers are provided with the protective equipment and training necessary to perform their tasks safely, and are actively involved in health and safety efforts.

Effective date of implementation

This policy shall be effective and operative from January 1st, 2014



THE KINGSBURY PLC

HEALTH AND SAFETY POLICY

1. STANDARD

As a service sector organization, The Kingsbury PLC is committed to maintaining the highest standards of health and safety across its operations, thereby providing a safe and injury-free working environment for all employees. This guideline serves as the minimum standard on health and safety management practices that should adopt; departments which have a higher level of vulnerability to health and safety risks are encouraged to implement more stringent practices reflecting sector-specific risks.

2. SCOPE

This policy is applicable for all departments and relevant service providers of The Kingsbury PLC.

3. COMMITMENT

We seek to prevent all accidents and occupational diseases across our operations, thereby ensuring the protection of all our employees. In driving towards this objective, we are committed to:

- ◆ Maintaining hygienic, safe, and healthy working conditions, machinery and equipment and provide the necessary instructions and training that is required for this purpose.
- ◆ Ensure compliance to all health and safety laws, rules, regulations,
- ◆ relevant international standards, and client requirements. Also encouraged to obtain the ISO 45001: 2018 Occupational Safety & Health Management System certification.
- ◆ Organization will seek to proactively engage in hazard identification and risk assessment and define subsequent corrective actions to effectively control health and safety risks in the workplace.
- ◆ Organization is encouraged to educate and provide relevant health and safety training to employees, which in turn will nurture a culture of safety in the organization and empower employees to avoid unsafe situations.
- ◆ All employees should also take reasonable care of their own health and safety whilst at work and fully co-operate with the company in all health and safety related initiatives.
- ◆ Organization will ensure that contractors, service providers and other third parties entering the site are made sufficiently aware of the applicable health and safety practices in place and are equipped to carry out their tasks safely.
- ◆ Drive continuous improvements in occupational safety and health management through ongoing communication, training and driving towards performance targets.
- ◆ Ensuring the 100% complete and accurate reporting of relevant health and safety data to The Kingsbury & Hayleys Group Sustainability on a timely basis following the set reporting requirements of the GRI Standards and Hayleys' Cube reporting.

Aligning with The Kingsbury PLC Sustainability strategy this policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practice.

4. RESPONSIBILITY

The Heads of The Kingsbury PLC will be responsible in ensuring that this policy is valued and adhered to.



THE KINGSBURY PLC

PROCUREMENT POLICY

1. STANDARD

The Kingsbury PLC has developed deep relationships across extensive supply chains, both locally and internationally. The organization is committed to ensuring that procurement activities deliver a competitive advantage while generating sustainable value across the sector supply chains. This guideline serves as the minimum standard on procurement practices that should adopt; in addition to this, companies are encouraged to align procurement practices with strategic aspirations and industry best practices.

2. SCOPE

This policy is applicable for all departments and relevant service providers of The Kingsbury PLC.

3. COMMITMENT

We seek to propagate sustainable practices and drive the creation of responsible value across our supply chains. We are therefore committed to,

- ◆ Supplier selection should follow a formal and structured process that is based on objective and transparent criteria, free from any form of bias, discrimination and/or personal interests. The Group Sourcing division has developed a standard Supplier Verification Process and a Supplier On-Boarding Template for the Hayleys Group. The evaluation criteria will contain the following at a minimum
 - ◆ Product specifications
 - ◆ Price and payment flexibility
 - ◆ Financial stability
 - ◆ Safety and quality
 - ◆ Technical and innovation capabilities
 - ◆ Social and environmental compliance
- ◆ Over the long-term, Sectors should strive to screen all key suppliers for social and environmental practices to ensure responsible sourcing. Sectors should initially initiate screening for large-scale suppliers and annually increase coverage. Please refer to Attachment 2 for sample criteria. Sectors are also encouraged to carry out supplier audits on a regular basis, ensuring continued compliance to quality standards as well as social and environmental practices.
- ◆ Effective and appropriate segregation of duties within all procurement functions to prevent possible frauds
- ◆ Proactively engage with suppliers and implement long-term supplier development programs to enhance capabilities and capacity to ensure alignment to the Group's long-term needs. Development programs will be designed and implemented based on specific supplier strategies and should encompass the following as a minimum:
 - ◆ The Program should be structured based on clearly identified ESG benefits for the supplier and the Group company
 - ◆ Resource allocations should be determined on an annual basis, including financial, human and other resources

- Sectors should formalize program through suitable MoUs, project plans and supplier agreements among others
- ♦ Proactively pursuing alternative local counterparts to foreign suppliers, with the aim of increasing the percentage spend on local procurement, thereby increasing local value addition.
- ♦ Ensuring the 100% complete and accurate reporting of relevant procurement and supply chain related data to Hayleys Group Sustainability on a timely basis following the set reporting requirements of the GRI Standards and Hayleys' Cube reporting

Aligning with The Kingsbury PLC Sustainability strategy this policy will be reviewed periodically and communicated to relevant and interested parties, facilitating collaboration and raising awareness on sustainable practices.

Responsibility

The Heads of The Kingsbury PLC will be responsible in ensuring that this policy is valued and adhered to



THE KINGSBURY PLC

CUSTOMER MANAGEMENT POLICY

1. STANDARD

This guideline serves as the minimum standard on customer relationship management that entire organization should adopt and a formal promise to our customers representing our commitment to fulfilling their needs; in addition to this, organization is encouraged to adopt industry-specific best practices to build and sustained competitive edge.

2. SCOPE

This policy is applicable for all department and relevant service providers of The Kingsbury PLC.

3. COMMITMENT

We aspire to delight our customers through superior product quality and excellent service which meets or exceeds their needs and expectations. In achieving this goal, we are committed to,

- ♦ Nurturing customer relationships that are based on trust and mutual respect through developing long- term partnerships. Sector should seek to build customer relationships centring on value propositions underpinned by innovation, responsible production/marketing, customer service and satisfaction.
- ♦ Maintaining 100% compliance to relevant laws and regulations relating to customers, including health and safety aspects of products/services, marketing and product labelling among others.
- ♦ Ensuring that customers receive all relevant information about our products/services and fully understand the terms and conditions relating to each product/service they obtained.
- ♦ Sectors are encouraged to obtain recognised health and safety certifications, thereby providing assurance to customers on the safety of using our products/ services.
- ♦ Sectors should also comply with all relevant ESG requirements set out by customers/agents and implement a mechanism to ensure continued compliance with the same.
- ♦ Sectors are encouraged to carry out customer satisfaction surveys periodically, thereby
- ♦ obtaining feedback on critical aspects including product & service quality.
- ♦ Sectors should implement a quick and effective mechanism for customers to present their grievances and disputes. A systematic and clear process should be implemented to address and resolve such complaints within a reasonable period of time. In addition to sector-level grievance mechanisms, customers can also direct their complaints, suggestions and other feedback to the following:

Corporate Affairs Unit
info@cau.hayleys.com
+94112627000

- ♦ Ensuring the 100% complete and accurate reporting of relevant customer related data to The Kingsbury and Hayleys Group Sustainability on a timely basis following the set reporting requirements of the GRI Standards and Hayleys' Cube reporting.

THE KINGSBURY PLC

COMMUNITY RELATIONSHIPS

1. STANDARD

The Kingsbury PLC ensures legitimacy of the business from a community perspective, provides assurance to shareholders that social risks are identified and managed and preserves the company's reputation in times of crisis. For The Kingsbury, the deep-rooted relationships it has nurtured with communities through its extensive reach, also allows it to drive meaningful change in these communities, supporting socio-economic progress and sustainable development.

2. SCOPE

This policy is applicable for all departments and relevant service providers of The Kingsbury PLC.

3. COMMITMENT

We seek to nurture ethical, transparent, and mutually beneficial relationships with the communities in which we operate. This is to be achieved through the following:

- ◆ Organization should develop and execute a community relations strategy which reflects its' social goals and the expectations of its' communities.
- ◆ Implement credible and effective community grievance mechanisms which enable complaints and concerns to be identified and addressed in a timely manner. Community stakeholders should be made aware of the grievance
- ◆ process through suitable signposting, the corporate website, and other channels of community dialogue.
- ◆ Show sensitivity to the culture, traditions, customs and social norms of region in which we operate.
- ◆ Organization should actively engage in strategic community development initiatives broadly focusing on the key areas of education, health and well-being, livelihood development, religion, and culture. Initiatives should be formulated and driven primarily at organisation level based on identified community needs. Adequate financial, and human resources should be allocated for project execution. Certain significant projects may also be driven by the Hayleys Sustainability Unit.
- ◆ The progress of all projects should be monitored periodically, through impact assessments, audits, feedback from beneficiaries and independent third parties (where necessary) to ensure that program objectives are met.
- ◆ Encourage and reward employee volunteerism, thereby recognising employee involvement.
- ◆ Organization is encouraged to build partnerships with regional community groups, NGOs, and local governments.
- ◆ Ensuring the 100% complete and accurate reporting of community project related information to The Kingsbury and Hayleys Group Sustainability on a timely basis following the set reporting requirements of the GRI Standards and Hayleys' Cube reporting.

Responsibility

The Heads of The Kingsbury PLC will be responsible in ensuring that this policy is valued and adhered to.

