	<b>CORPORATE SOCIAL ENVIRONMENT RESPONSIBILITY (CSER)</b>	DOCUMENT NO: CSER-001 REVISION NO. : 1
	<b>MYBRUSH CSER ETHICAL AND ENVIRONMENTAL CODE OF CONDUCT</b>	PAGE : 1 OF 7 ISSUED DATE: 1 <sup>ST</sup> AUGUST 2022

## 1.0 OBJECTIVE

- 1.1 The MYBRUSH Ethical and Environmental Code of Conduct ("Code of Conduct") sets out the minimum standards that MYBRUSH expects itself, and all its suppliers and their subcontractors to meet ("Suppliers").
- 1.2 MYBRUSH and its Suppliers shall comply with all legal requirements relevant to their business. Where the obligations in the Code of Conduct are more rigorous than those specified by the relevant national laws then the obligations in the Code of Conduct will prevail.
- 1.3 Suppliers are obliged to ensure that the standards set out in the Code of Conduct are not only observed in their own facilities but also communicated to their own suppliers. MYBRUSH will provide written notification to Suppliers of any changes and/or variations to this Code of Conduct from time to time.

## 2.0 SCOPE

- 2.1 This requirement shall be applicable to all employees in MYBRUSH and all supply chains related to MYBRUSH business.

## 3.0 RESPONSIBILITIES


- 3.1 The Management is responsible for developing a strategic initiative for this policy.
- 3.2 The CSER committee is responsible for implementing and ensuring compliance with this policy within the organization.
- 3.3 The Head of Department is responsible for implementing and communicating this policy with their subordinates.
- 3.4 All Employees are responsible for gaining an understanding and compliance with the guidelines set out in this policy.

## 4.0 CODE OF CONDUCT

### 4.1 NO FORCED LABOR

- 4.1.1 There shall be no forced, bonded, indentured, involuntary prison labor, slavery, or trafficking of persons. All work must be entered into freely and voluntarily.



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- 4.1.2 Migrant workers shall not pay employers' or agents' recruitment fees or other related fees for their employment. All migrant workers must have full access to their personal identification documents at all times. Workers shall be free to terminate their employment by giving reasonable notice to the company **without fear of penalty**.

## **4.2 NO CHILD LABOR**

- 4.2.1 The minimum age of workers should not be less than the age of completion of compulsory schooling, and in any case, shall not be less than 15 years old.
- 4.2.2 Young persons under 18 shall not be assigned heavy or hard work and be exposed to hazardous conditions or be required to work at night.

## **4.3 WORKING HOURS, WAGES, AND BENEFITS**


- 4.3.1 Working hours shall not be excessive and shall be in line with national limits. Overtime must be voluntary and paid at a premium rate in line with local law. All workers must receive at least one rest day in every seven days.
- 4.3.2 Only workers with a legal right to work shall be employed. All workers shall be provided with written and understandable information about their wages and expected take-home pay before they sign their employment contract, including any overtime rates and circumstances where pay may be deducted.
- 4.3.3 Workers shall be entitled to paid annual leave, public holidays, medical leave and benefits in accordance with national laws.

## **4.4 GENERAL LABOR PRACTICES**

### **4.4.1 NO DISCRIMINATION**

- 4.4.1.1 MYBRUSH and its Suppliers shall not discriminate against their workers. There shall be no discrimination in recruitment, hiring, remuneration or access to training, promotion, overtime, termination or retirement based on race, ethnicity, caste, national origin, age, religion, disability, gender, gender identity, marital status, sexual orientation, union membership or political affiliation. Men and women, of all nationalities, will receive equal remuneration for work of equal value.



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#### 4.4.2 FAIR DISCIPLINARY PRACTICES

- 4.4.2.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation shall be prohibited.
- 4.4.2.2 Disciplinary procedures should always include an escalating series of verbal and written warnings including an internal inquiry prior to suspension or dismissal. Workers and supervisors should be made aware of the employer's grievance procedures and have the right to lodge complaints regarding disciplinary issues without fear of retaliation.

#### 4.4.3 FREEDOM OF ASSOCIATION

- 4.4.3.1 MYBRUSH and its Suppliers shall ensure that workers are not prevented from free association.
- 4.4.3.2 Where the right to freedom of association and collective bargaining is restricted under law, Suppliers must facilitate the development of parallel means for independent and free association and bargaining.


#### 4.4.4 HEALTH AND SAFETY

- 4.4.4.1 MYBRUSH and its Suppliers shall comply with relevant laws and regulations to ensure workers operate in safe environments where appropriate measures are in place to prevent accidents. Suppliers must have policies and systems in place to detect, avoid and respond to potential risks to the safety and health of workers.

#### 4.4.5 ANTI-BRIBERY AND TRANSPARENCY

- 4.4.5.1 MYBRUSH and its Suppliers will not tolerate, permit or engage in bribery, corruption, or unethical practices with public officials or individuals in the private sector.
- 4.4.5.2 MYBRUSH shall have full and free access to inspect Supplier's documentation, facilities, and worker accommodation, including the ability to speak with and interview workers.



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4.4.5.3 MYBRUSH and its Suppliers shall have programs in place to ensure that whistleblowers may raise concerns confidentially, anonymously, and without fear of retaliation as permitted by law.

#### 4.4.6 ENVIRONMENT

4.4.6.1 MYBRUSH and its Suppliers have a responsibility to protect human health and the environment by meeting applicable environmental legislation including air emissions, solid/hazardous waste, and water discharge.

4.4.6.2 Suppliers must adopt reasonable measures to mitigate negative operational impacts on the environment and strive to continuously improve environmental performance.

#### 4.4.7 WORKER ACCOMMODATION

4.4.7.1 Any accommodation provided for workers must be safe, clean, and suitable for residential use.

4.4.7.2 Accommodation must be fit for purpose and of durable construction. Fire safety and prevention, first aid access, and fire emergency procedures must be in place at all worker accommodations.

4.4.7.3 Accommodation must be separate from production areas and segregated by gender. Each worker must have their own bed. Toilets and showers must be kept clean and separated by gender.


4.4.7.4 There must be a minimum of one toilet, one wash basin, and one bathtub or shower for every six persons. There must be an adequate supply of drinking water to which workers have unrestricted access.

#### 4.4.8 RESPONSIBLE SOURCING MATERIALS

4.4.8.1 Materials and minerals in MYBRUSH must be sourced in an environmentally responsible manner and in safe working conditions where work is chosen freely.

4.4.8.2 Suppliers shall make reasonable efforts to ensure that the materials and minerals they source are produced or mined in accordance with local, national and international laws.



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- 4.4.8.3 Suppliers shall have a Conflict Minerals policy and system in place in line with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidelines for Responsible Supply Chains.
- 4.4.8.4 Suppliers shall reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups or other criminal organizations that are perpetrators of human rights abuses.
- 4.4.8.5 Suppliers shall exercise due diligence in the sourcing of these minerals and make available the evidence of the due diligence measures they have taken on request.
- 4.4.8.6 MYBRUSH reserves the right to add additional minerals to this policy.


#### **4.5 CODE OF CONDUCT IMPLEMENTATIONS**

- 4.5.1 Suppliers must establish internal management systems and processes to ensure that the requirements of the MYBRUSH Code of Conduct are observed.
- 4.5.2 In order to ensure that the requirements in the Code of Conduct are met in the supply chain, MYBRUSH reserves the right to audit or authorize a third party to audit any Supplier that is engaged in the production, and processing or supply of materials for MYBRUSH products and technology.
- 4.5.3 All MYBRUSH's audits shall require full cooperation from the Suppliers and may include any subcontractor or labor agent used by the Supplier. Audits may occur with or without advance notice.
- 4.5.4 All Suppliers must observe strict compliance with this Code of Conduct and any breach of the same may be regarded as a material breach of the Suppliers' contract/agreement with MYBRUSH.
- 4.5.5 Upon review of audit results and whenever appropriate, MYBRUSH at its sole discretion may cancel a purchase order or terminate any existing contract/agreement entered with the Supplier.

#### **5.0 CONTINUAL IMPROVEMENT**

- 5.1 MYBRUSH shall ensure a periodic and continuous review and monitoring of the implementation of this Code of Conduct.**



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**5.2** MYBRUSH believes in continually improving our social compliance system and labor standard by periodically reviewing our code of conduct, policies and procedure, and its related processes and to ensure that our staff is adequately trained and motivated. The internal audit department shall be responsible for a semi-annual review of social compliance and shall recommend areas of improvement to enhance this management practices in the area of business ethics, social compliance and CSER

**5.3** MYBRUSH shall have the strategy, processes, and sufficient resources in place to meet the responsibilities related to social compliance and labor standard and ensure that there is continuous improvement in its implementation.

**THIS POLICY WAS ACKNOWLEDGED AND ENDORSED BY:**

Issued By	HR Department
Verified By	<b>Lee Boon Oon</b> HR Director
Approved By	<b>Datuk Lee Fook Yuen</b> Managing Director
Date	1 <sup>st</sup> August 2022



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### SUPPLIER ACKNOWLEDGEMENT

We have received the MYBRUSH Ethical and Environment Code of Conduct and understand that compliance is a fundamental condition of the contractual relationship with MYBRUSH.

Supplier Name : \_\_\_\_\_

Factory/Facility Address : \_\_\_\_\_

\_\_\_\_\_

Telephone No. : \_\_\_\_\_

Signature of Company Director : \_\_\_\_\_

Name of Company Director : \_\_\_\_\_

Date : \_\_\_\_\_

