

WORKPLACE ANTI-BULLYING POLICY

1. Purpose

The purpose of this Workplace Anti-Bullying Policy (“Policy”) is to promote a safe, respectful, and inclusive working environment that is free from bullying. This Policy outlines the Company’s commitment to preventing bullying, establishing clear behavioural expectations, and providing procedures for reporting, investigating, and resolving bullying-related complaints.

2. Scope

This Policy applies to all employees of the Company and its subsidiaries (“the Group”), including full-time, part-time, temporary, contract staff, interns, trainees, and any third parties performing work on behalf of the Company and the Group (e.g., vendors, consultants and external agencies). This Policy applies within the workplace, during work-related activities, and on any Company-related communication or digital platforms.

3. Policy Statement

The Company is committed to providing a work environment where all individuals are treated with dignity and respect. Bullying is strictly prohibited and will not be tolerated under any circumstances. Any form of bullying, harassment, threatening demeanor – whether directly or indirectly, physical, psychological, verbal, non-verbal, in writing or in written form including digital is considered misconduct and may be subject to disciplinary and/or legal action (civil and/or criminal).

4. Definitions

Bullying refers to any repeated, intentional or unreasonable behaviour (verbal, non-verbal, physical, psychological or digital) that causes, or is likely to cause, harassment, distress, fear, humiliation, or harm to another individual.

5. Legal Framework

This Policy aligns with relevant laws including the Sections 507B to 507G, Penal Code (Amendment) Act 2025, which criminalise workplace bullying and related offences. Offenders may face up to 3 years’ imprisonment for harassment or doxxing (Sections 507B, 507E), and up to 10 years’ imprisonment where bullying leads to attempted or completed suicide (Section 507D (2)), in addition to fines or other penalties as prescribed under law.

6. Employer’s Duty of Care

The Company has a legal and moral obligation to maintain a safe work environment that is free from bullying and all forms of harassment and intimidation. All complaints will be taken seriously, investigated promptly, and addressed in accordance with internal policies and legal requirements. Failure to act may expose the Company to legal and reputational risks.

7. Roles and Responsibilities

Managements Supervisors:

Promote a respectful workplace culture, address bullying complaints promptly, report suspected bullying to HR, support affected employees and maintain confidentiality.

Employees:

Treat colleagues with respect, refrain from any form of bullying, report incidents of bullying observed or experienced.

8. Reporting Complaint Procedures

Employees are encouraged to report any bullying incident through HR, their immediate supervisor or manager, or the whistleblowing/grievance mechanism. All reports will be handled confidentially to the maximum extent possible. Victimisation or retaliation against individuals who report bullying in good faith is strictly prohibited.

Employees also have the option to report any suspected incidents of bullying anonymously via our whistleblowing channel at whistleblowing@ocbb.com.my.

9. Investigation Process

HR will conduct a fair, impartial, and timely investigation in accordance with the Company's Disciplinary Guidelines. Both the complainant and the alleged offender will be given the opportunity to present their account. All findings and outcomes will be properly documented, and appropriate corrective or disciplinary action will be taken where bullying is substantiated.

10. Support for Affected Employees

The Company may provide appropriate support measures such as counselling, or temporary work adjustments to ensure the wellbeing of affected employees.

11. Training Awareness

The Company will provide regular training and awareness programs for employees and management to recognise, prevent, and address workplace bullying, and to understand reporting and support processes.

12. Review of Policy

This Policy shall be reviewed annually or as deemed necessary due to legal changes or organizational needs.

13. References

- Company's Code of Conduct and Ethics
- Policy on Corporate Code of Conduct
- Policy on Whistle Blowing
- Penal Code (Amendment) Act 2025 — Sections 507B to 507G