

**KKB ENGINEERING BERHAD<sup>®</sup>  
& GROUP OF COMPANIES**

**ANTI-SEXUAL HARASSMENT  
POLICY & PROCEDURES**



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### 1. INTRODUCTION

- (a) KKB Engineering Berhad and its Group of Companies (“**KKB Group**”) acknowledges that all human beings are entitled to the right to be treated with dignity and respect, irrespective of the gender, age, race, colour, language or nationality. Therefore, KKB Group has zero tolerance against any acts, conducts or behaviours which amount to or could reasonably be construed as constituting sexual harassment.
- (b) This Anti-Sexual Harassment Policy and Procedures (“**Policy**”) aims to establish framework for KKB Group to prevent the occurrence of, and to deal with any act of sexual harassment.
- (c) This Policy shall be read in conjunction with KKB Group’s Whistle Blowing Policy & Procedures, including any amendments, consolidation and/or replacement of the same, and shall further include any further policy, guideline and/or procedure related thereto as may be issued by KKB Group.

## **2. SCOPE OF APPLICATION**

This Policy shall apply to all the employees, including full-time, part-time, temporary, probationary, casual, contract and seconded employees as well as interns/trainees and directors of KKB Group. This Policy shall further extend to any consultants, contractors, agents, volunteers, sponsors, customers, suppliers, distributors, business contacts, business partners or associates, government and any other third party with whom KKB Group has commercial or business dealings with.

## **3. SEXUAL HARASSMENT**

- (a) Sexual harassment refers to any unwanted, unwelcomed, unsolicited acts, conducts or behaviours of sexual nature having the effect of constituting verbal, non-verbal, visual, psychological or physical harassment. Sexual harassment could include sensitive and offensive languages, jokes and suggestions, verbal abuse, unnecessary physical contact, unwanted proposition, request, threats, speculation about private sexual activities, unwelcome sexual advances, requests for sexual favours, poster or graffiti of sexual nature and all other acts which could cause sexual attention.
- (b) Examples of sexual harassment may include but are not limited to the followings:
  - (i) A supervisor requesting sexual acts, explicitly or implicitly, as a condition of a person’s employment;
  - (ii) Ongoing remarks about a person’s sex made by a colleague;
  - (iii) Harassment that has the effect of interfering with an employee’s ability to work or conduct that creates a hostile work environment;
  - (iv) Direct physical contact of a sexual or unwanted nature;
  - (v) Preferential treatment of an employee who submits to sexual conduct;
  - (vi) Use of sexual publications, websites, or discussions; and
  - (vii) Retaliation for sexual harassment complaints.
- (c) Sexual harassment shall be avoided at all costs with non-exhaustive steps as follows:

- (i) Respect and treat all colleagues alike;
- (ii) Do not ask for favours or anything except benefits which you are legitimately entitled to;
- (iii) Avoid closed doors, whenever possible, when dealing with colleague of opposite sex;
- (iv) Dress and behave in a professional manner; and
- (v) Avoid making personal remarks, unless otherwise work related.

#### **4. REPORTING ON SEXUAL HARASSMENT**

##### **4.1 Lodging of Complaint**

- (a) Any incident of sexual harassment shall be reported to the Human Resource Department at the earliest possible opportunities.
- (b) Any complaint concerning sexual harassment shall consist of the following information:
  - (i) Details of the complainant;
  - (ii) Details of the harasser;
  - (iii) Details of the incident of sexual harassment, e.g., date, time, location, description of the incident;
  - (iv) Details of the witness, if any;
  - (v) Effect of the incident upon the complainant;
  - (vi) Steps taken, if any, by the complainant in response to the incident of sexual harassment; and,
  - (vii) Such other relevant information including knowledge of other sexual harassment incidents.

##### **4.2 Investigation**

- (a) HRBS shall investigate the complaint lodged. This may include interviewing the harasser and such other relevant personnel and reviewing of video footage or audio recordings or such other evidence as may be available.
- (b) The result of the investigation shall be communicated to the complainant upon completion of the investigation.

##### **4.3 Disciplinary Action**

In view that sexual harassment is a serious misconduct, the harasser shall be subject to Domestic Inquiry Proceedings if it appears to HRBS that the complaint is more likely than not to be true. If otherwise, the Management may, at the advice of HRBS, have the harasser reprimanded in writing.

#### **5. MONITORING, REVIEWING AND ENFORCEMENT**

The Management Executive Committee (“MANCO”) is ultimately responsible to monitor the implementation of this Policy and shall review its enforcement on yearly basis, including assessing its suitability and compliance with the latest statutory developments on sexual harassment prevention.

*This Anti-Sexual Harassment Policy and Procedures is reviewed and approved by MANCO on **26 June 2025**.*

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