



KLN LOGISTICS GROUP LIMITED

(Incorporated in the British Virgin Islands and continued into
Bermuda as an exempted company with limited liability)

Stock Code 636

Global Equal Opportunities Policy

(Revised on 28 March 2025)

1. Purpose

- 1.1 To communicate our commitment to promoting equal opportunities, eliminating discrimination and harassment, including discrimination and/or harassment on grounds of sex, pregnancy, marital status, age, disability, family status, national or ethnic origins, race, colour, nationality, descent, sexuality or religious belief in all aspects of employment, training and career development.
- 1.2 To ensure everyone is treated with respect and dignity and no one will be subjected to any unwelcome conduct, or to an environment that is hostile or intimidating on grounds of his or her sex, pregnancy, marital status, age, disability, family status, national or ethnic origins, race, colour, nationality, descent, sexuality or religious belief.

2. Scope

The document applies to all KLNⁱ employeesⁱⁱ. This policy also extends to KLN's business partnersⁱⁱⁱ for their benefit.

3. Guidelines

- 3.1 It is the responsibility of each employee to adhere to this policy at all times to maintain a work environment which is free of discriminations and harassment.
- 3.2 Each individual will be assessed on the basis of the job requirements and their relevant capabilities, and not on other irrelevant considerations.
- 3.3 Each employee should not take part in, encourage or condone cases of any forms of harassment, which offends equality of opportunities.

4. Discrimination

- 4.1 KLN will not tolerate direct or indirect discrimination based on sex, pregnancy, marital status, age, disability, family status, national or ethnic origins, race, colour, nationality, descent, sexuality or religious belief. In preventing discrimination, employment related decisions such as recruitment, promotion, transfer, training, dismissal and redundancy as well as terms and conditions of employment should be based on consistent selection criteria. Individuals who make employment-related decisions should not assume that persons of a particular sex, marital status, age, family status, national or ethnic origins, race, colour, nationality, descent, sexuality or religion, or who are not pregnant or without a disability are only able to do certain kinds of work, and should ensure that these factors are not used as grounds for making decisions.
- 4.2 Direct discrimination is when an individual is treated less favourably than others in the same or comparable circumstances because of the individual's sex, pregnancy, marital status, age, disability, family status, national or ethnic origins, race, colour, nationality, descent, sexuality or religious belief.
- 4.3 Indirect discrimination can occur when the same requirements or conditions are imposed on everyone, but the individual belongs to a particular group (such as people of a particular sex, pregnancy, marital status, age, disability, family status, national or ethnic origins, race, colour, nationality, descent, sexuality or religious belief) which is less likely to be able to comply with

the requirements or conditions because of one of those particular characteristics, and the requirements or conditions cannot be justified.

- 4.4 Records of notes of employment related decisions should be made and filed with the relevant Human Resources Department. These notes will serve as a valuable explanation and defence against any unfounded suggestion of discrimination.

5. Harassment

KLN will not tolerate sexual harassment, harassment on the ground of disability or race or any other forms of harassment offending equality of opportunities. Harassment can take the form of unwelcome conduct, or subjecting another person to an environment that is hostile or intimidating.

6. Grievance

- 6.1 Employees and business partners with enquiries, complaints, or requests for assistance on discrimination or harassment issues may contact the Head of Human Resources & Administration of the relevant local office or of the Head Office, as the case may be. Complaints about discrimination or harassment will be dealt with seriously.
- 6.2 Investigations into the complaints will be conducted effectively and promptly by the relevant Division / Department / Business Unit Head, who is not interested in the subject of complaint, jointly with the Head of Human Resources & Administration of the individual local office or of the Head Office, as the case may be. The investigations should be reported to the Managing Director / General Manager of the local office, where necessary.
- 6.3 All complaints are treated as confidential to the extent consistent with the need to conduct a fair, complete and responsive investigation. Individuals are encouraged to disclose their identity and contact details so that they can be contacted for further information, if necessary, and feedback on the complaints can be provided. An anonymous report which fails to provide clear and adequate information will not be processed.
- 6.4 It is important for anyone subjected to discrimination or harassment to keep a record of the incident(s) so as to be able to recall exactly what has happened. Individuals are also encouraged to come forward with complaints as soon as possible after the alleged incidents as a lapse in time may, in certain circumstances, weaken a complainant's case.
- 6.5 KLN is concerned to ensure that all employees and business partners feel able to raise such grievances and no individual will be penalized for doing so. Victimization, intimidation or penalization of an employee or a business partner for initiating a good faith complaint or providing information in the complaint investigation process will not be tolerated. KLN reserves the right to take disciplinary or other action against anyone who victimises or retaliates (or threatens to do so) against a complainant.

7. Action

Employees who are found to have discriminated against, or harassed, any person on the ground of sex, pregnancy, marital status, age, disability, family status, national or ethnic origins, race, colour, nationality, descent, sexuality or religious belief may be subjected to disciplinary action, including summary dismissal.

8. Monitoring

The effectiveness of this policy will be monitored regularly. Procedures and practices, requirements and conditions will be reviewed in the light of monitoring results with a view to taking steps to promote equality and prevent discrimination and harassment.

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- i. "KLN" refers to KLN Logistics Group Limited, all its subsidiaries and entities under its direct and/or indirect control
 - ii. "employees" include employees (full- or part-time) under current employment of KLN and job candidates
 - iii. "business partners" means any customers, contractors, agents and anyone else who has dealings with KLN, including those to whom KLN provides, and from whom KLN is supplied with, goods, services or facilities