
TOM Group Limited
Human Rights Policy

(If there is any inconsistency or conflict between the English and the Chinese versions, the English version shall prevail.)

1. Policy Statement

TOM Group Limited, its subsidiaries and controlled affiliates (collectively, the “Group”) strives to respect and promote human rights. The Group aims to help increase the protection and enjoyment of human rights within the communities in which it operates. Respect for human rights is a fundamental value of the Group.

This Policy applies to all Group companies. The Group also expects its business partners and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

This Policy is also addressed in the TOM Group Code of Conduct, the TOM Group Modern Slavery and Human Trafficking Statement, as well as the TOM Group Supplier Code of Conduct which sets out the Group’s expectations with regards to respect for human rights, including labour rights, of the workers in the Group’s extended supply chain.

2. Approach

This Policy is guided by international human rights principles encompassed within the Universal Declaration of Human Rights, including those contained within the International Bill of Human Rights and the International Labour Organisation’s 1998 Declaration on Fundamental Principles and Rights at Work. In addition, the Group also respects the international human rights principles under the United Nations Guiding Principles on Business and Human Rights.

Equality, Diversity and Inclusion

The Group values the diversity and inclusion of the individuals with whom it works. It is committed to equal opportunity and has no tolerance for discrimination and harassment. It works to maintain workplaces that are free from discrimination or harassment on the basis of race, colour, national or social origin, ethnicity, religion, age, disability, sex, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, development, compensation and advancement within the Group is qualifications, performance, skills and experience.

The Group does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is not tolerated at the workplace and in any work-related circumstance outside the workplace.

Freedom of Association and Collective Bargaining

The Group respects its employees' right to join or form a labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, the Group is committed to establishing a constructive dialogue with their chosen representatives. It is committed to bargaining in good faith with such representatives.

Employment Conditions and Working Hours

The Group complies with the applicable laws and regulations in relation to working conditions. It strictly observes all local legislation and specific working hours requirements in the countries where it has operations. Divisions and business units have established their own working hours arrangements in accordance with their business requirements and these working hours arrangements are communicated to employees.

Restructuring

The Group is committed to identifying, preventing, and mitigating adverse human rights impacts resulting from any business transaction of the Group, including any restructuring decisions or implementations. Central to these commitments are the following principles:

- Identify the potential impact of human rights issues on employees as early as possible.
- Communicate with employees and where necessary, the relevant labour unions at the earliest possible opportunity on potential impacts, with due regard to human rights considerations.
- Prevent and limit redundancies where possible with compensation including severance payments (at or above statutory requirements) provided for redundancies.
- Include respect for human rights considerations in transition planning, such as redeployment and offering outplacement services to impacted staff where appropriate.
- Foster meaningful and constructive dialogue with employees, and take active steps in order to mitigate adverse effects on employees in the case of any ownership change or structural change to the business.

Community Consultation

The Group recognises that it is part of the communities in which it operates. Where applicable, it conducts appropriate due diligence and engages with communities on human rights matters that are important to them. The Group aims to ensure through dialogue it listens, learns and considers the views of the communities in which it conducts its businesses.

Anti-modern Slavery

The Group prohibits the use of all forms of child labour or forced labour, including prison labour, bonded labour, any form of slavery and any form of human trafficking.

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