

Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that they are not complicit in human rights abuses

Assessment, Policy and Goals

Zenith Media recognizes and respects the inherent universal human rights and fundamental freedoms. The company complies with Malaysian employment laws that incorporate the fundamental declaration of human rights.

Being a services company, people are at the core of Zenith Media. Our people's talents, skills and competencies are responsible for the creative media solutions we provide for our clients' businesses. Hence, we respect and practice the principle of equal rights when we recruit and throughout employment. We believe in the principle of inclusion. We ensure a respectful and conducive environment where everyone is given equal opportunity to do their work and excel, the freedom to express their opinions and of speech without fear or discrimination, and are assessed and remunerated fairly based on the merit of their work.

1) Race, colour, religion, politics

The company does not discriminate against race, colour, religion or politics in the hiring, promotion, remuneration nor dismissal of staff. Employees are allowed to practice their chosen religion and belief without prejudice.

The company embraces the rich cultural diversity of its employees and celebrates all the main festivities throughout the year.

The company has an annual performance review of all staff and rewards, promotes and remunerates based on merit and without discrimination.

2) Gender

The nature of the media industry is such that it attracts a fair number of female employees. Zenith Media has female employees at all levels of service including at very senior levels based on merit of their performance.

3) Physical disabilities

The company does not discriminate against physical disabilities and hires and retains staffs that perform to their best abilities. In fact, Zenith Media tries to find employment to suit the abilities of all their staff members including the disabled.

4) Workshops and training

Upholding to the group's motto of "Our people, our future", the company also has an annual training calendar which includes workshops, talks and training in the development of human

capital. These include functional training at various levels as well as personal developmental training open for all employees.

5) Annual Leave

The company grants staff a minimal of 14 days for annual leave annually opposed to the minimum of 9 days stipulated by the Malaysian Labour Law. The staffs are given 17 days annual leave after a service of 3 years, 21 days after 5 years of service as a form of remuneration. Long serving and deserving staff are also given the option of sabbaticals. The company also does observe all national and state public holidays and all staff are given rights to those holidays.

The company believes strongly in the Code of Conduct and will carry out investigations if they have been violated in any manner.

Implementation

Zenith Media is part of Publicis Worldwide which has a comprehensive Code of Conduct which includes policies with regard to human rights.

The company will introduce the Code of Conduct to all employees in Q3 of 2013. Employees will be advised that they should report any abuses straight to the HR or CFO or CEO.

A committee will also be set up comprising the HR, CFO, CEO and a non-executive director to hear any complaints received.

The company targets to educate its vendors, suppliers and clients on the Code of Conduct that is practiced by the company by end of 2014. The company also will take steps to educate and inform new vendors, suppliers and clients as the business grows and develops.

Measurement and outcomes

Zenith Media has never been charged with any legal action related to human rights violations or that of any of the principles in the UN Global Compact.

By the end of Q3 2013, all Zenith Media staff would have read and understood the code of conduct and shall be required to hand in signed copies of the acknowledgment and acceptance of the code of conduct to the HR department.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Zenith Media respects the rights of employees to freedom of association and collective bargaining.

Being a small company of less than 80 employees, Zenith Media has a personal and friendly set up. We believe in practice and open dialogue between employees and the Management. Our “open door” concept allows subordinates and superiors to discuss operational or personal matters and resolve them immediately. Individual grievances and dissatisfaction can be aired directly to HR, the CFO or CEO. They are discussed and resolved to the satisfaction of both the employee and employer.

There are no unions and there have been no complaints against the company in this area.

Measurement and outcomes

The company will continue to monitor the progress of the matter.

Principle 4: The elimination of all forms of forced and compulsory labour;

Zenith Media does not employ or condone any form of forced or compulsory labour.

In line with the group motto, “Our people, our future”, we invest a significant amount of time and resources in developing our employees. This includes career developmental plans that fit in with the wishes of the employees themselves. They are free to determine their job and career path with Zenith Media providing them the support and skills for the job.

However, we are mindful that our company can become associated with forced labour through our business links with contractors and suppliers. We have to be more aware of the forms and causes of forced labour, as well as how it might occur in different industries.

Measurement and outcomes

The company will be more cautious about labour practices of our associates and make them aware of our own principles in this regard.

Implementation

By the end of 2014, Zenith Media will communicate to the vendors and suppliers with regard to our stand against forced or compulsory labour.

Principle 5: The effective abolition of child labour; and

Zenith Media does not practice nor condone any form of child labour. We believe that children are our future and any form of child labour puts a child at risk of danger and deprives a child of his/her basic human rights including the right to an education and future.

The Children and Young Persons (Employment) Act of Malaysia prohibits the employment of children younger than the age of 14.

As an internal rule we do not employ anyone below the age of 17.

However, we are mindful that our company can become associated with child labour through our business links with contractors and suppliers. We have to be more aware of the forms and causes of child labour, as well as how it might occur in different industries.

Measurement and outcomes

There are no children or under aged employees in the company.

Zenith Media will continue to employ the minimum age and qualification requirement when recruiting.

Implementation

By the end of 2014, Zenith Media will communicate to the vendors and working partners with regards to child labour policies and will constantly monitor them in this regard.

Principle 6: The elimination of discrimination in respect of employment and occupation

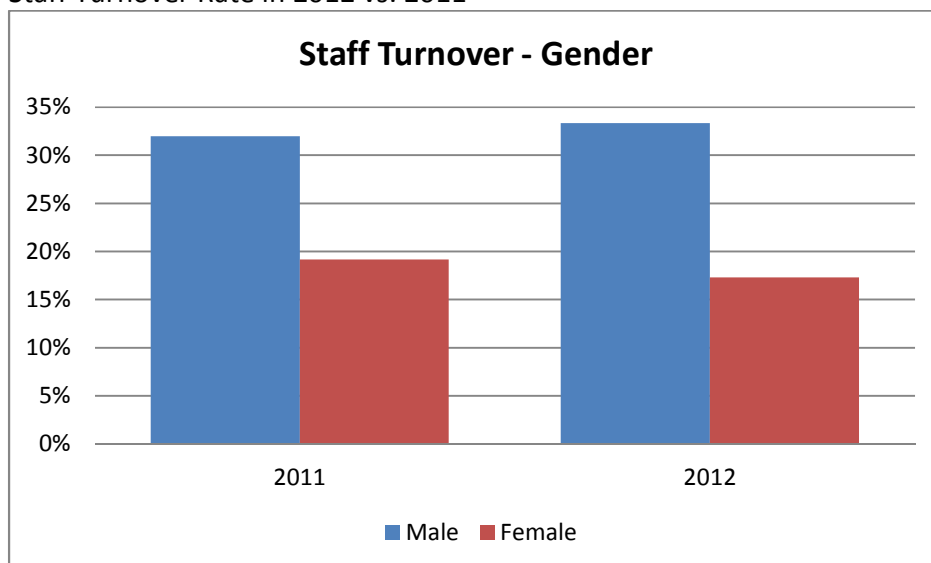
As an extension to human rights under principle 1, Zenith Media does not discriminate in respect of employment and occupation.

People are a major component of our business, “Our people, our future.” Employees are selected on the basis of their ability to do the job and that there is no distinction, exclusion or preference made on other grounds (race, religion, gender, etc.). We believe that this is the only way we can ensure all employees are given equal opportunities and not have their basic human rights infringed. This enables our employees to contribute positively to our company and to society. It gives them the confidence that the company gives them equal opportunity, rewards and progresses them based on merit.

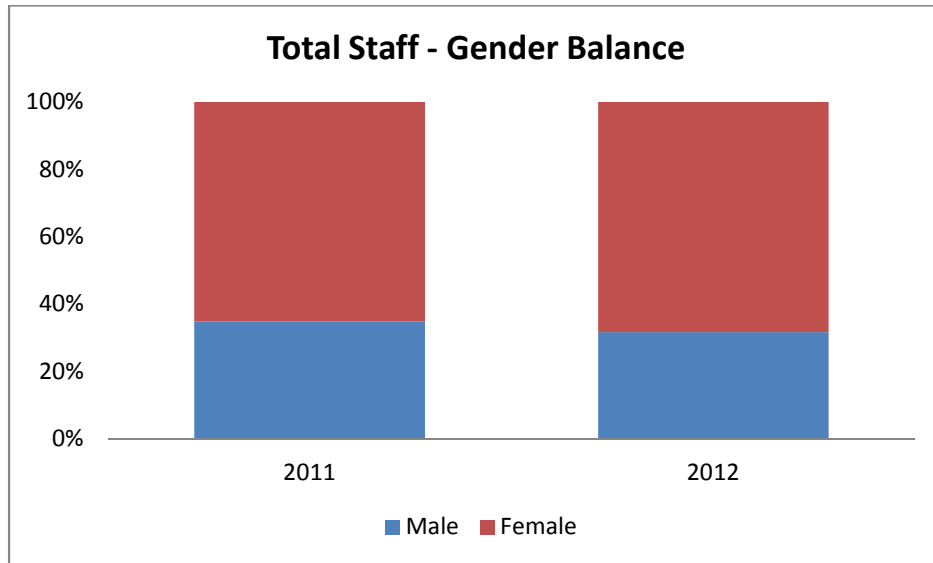
Implementation

In an industry with a high level of turnover, Zenith Media has a comparatively low level of staff turnover. Many of our employees across all levels have been with the company for more than 5 years.

Staff Turnover Rate in 2012 vs. 2011



The gender balance for 2011 vs. 2012 has been stable.



In 2013, Malaysia gazetted the Minimum Wages Act. Zenith Media is in full compliance with the Act.

In 2013, the company will employ an external HR consultant to monitor staff working conditions and morale with a view to explore areas for further improvement.

1. Human Capital development

The company works on a yearly roll out plan for human capital development via seminars, lectures and workshops that address all the employees or specific groups within the company. Training encompasses functional and personal development training. The company encourages inter-disciplinary learning to further develop human capital in the office either through formal training or through work projects.

2. Performance review

A yearly assessment is carried out by HR alongside Heads of Departments to assess employee performance and development. The annual review in March is the basis for the company to remunerate employees based on merit.

3. Age of employment, option to continue on contract

The company allows employment up to the age of 65 years with the option of half-day work for employees that wish to continue beyond 65 years old.

4. Health insurance

100% of our employees receive social security benefits provided by the state and the company in accordance to the law of Malaysia. In addition, the company pays for and covers all employees with additional medical insurance which covers clinical visitations and hospitalisation.

5. Employee welfare

The company believes in the well being of the staff and has a staff welfare programme in place. It includes regular recreational and social events, as well as an annual incentive trip overseas. This builds rapport amongst employees.

To date, we have no incidents of violations of labour principles including that in the area of discrimination. There have been no complaints, investigations or any legal cases against Zenith Media.

Measurement of outcomes

In 2013, the company will employ an external HR consultant to review the current situation and recommend any areas for improvement with regards staff working conditions and morale.

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies

The nature of our business based on intellectual solutions, minimises our impact on the environment. However, we are cognisant of the increasing importance of sustainability on our planet. Our group environmental stand and policy is summed as “Consume less, Consume better” and our target is to reduce our direct impact and do our part to save the environment.

Acacia Blue, a new company under the Zenith group of companies was incorporated in March 2013. It provides end to end CSR/Sustainability related services and helps companies realise and communicate their corporate good. This is one of the ways Zenith feels they can influence change in the way their clients operate/do business for the good of their brand, community and environment.

Implementation

1. Reduce, reuse, recycle

Unfortunately, our current leased office premise is in a building where the owners do not practice the 3Rs. Accordingly it is not possible to separate our waste. However, Zenith Media is

very active in sending newspapers, magazine and used papers for recycling on a weekly basis. The company also encourages the employees to reuse paper for printing.

We will continually engage the building owners about the implementing the 3R policy in stages.

Whilst the company may not be able to force the building owners to comply, we will engage with our staff to influence their families on the importance of 3Rs.

Our newly incorporated CSR company called Acacia Blue is pursuing several projects with clients in the areas of community and the environment.

Measurement of outcomes

Zenith Media will monitor 3Rs amongst its employees.

Acacia Blue will continually promote and execute CSR/Sustainability projects with clients.

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Zenith Media will uphold this principle and have a “zero-tolerance” on corruption.

In our Global Code of Conduct, there are 2 chapters that address this principle. The chapters are “Gifts and Inducements” and “Improper Payments”. In addition to the Global Code of Conduct, we have a Group Complaint Procedure for Accounting and Auditing Procedures that set out the group's complaint procedure for accounting and auditing matters.

Zenith Media works very closely with our suppliers and with that, the risk of corruption among our employees with our suppliers is zero. In addition, Zenith Media practices segregation of duties and therefore the potential areas of corruption are eliminated. Zenith Media also provides education for all level of employees up to management about corruption, as well as what to do if one should encounter it.

Implementation

Internally, we have maintained an excellent internal control procedure to check and balance all of our business transactions. Our records are maintained with proper supporting documents. This information is checked and controlled by finance, administration and HR department and ultimately reaches to the CEO.

Zenith Media will also continue to provide education and training to all employees on our anti-corruption commitment. As part of our training to the staff, communication channels and follow-up mechanisms for reporting concerns or seeking advice

Measurement of outcomes

To date, there is no report of incidents of corruption within Zenith Media.

Our accounts are subjected to statutory external audit (KPMG) annually. These audits are one of the methods of identifying any suspicious payments which could be related to bribery or corrupt behavior. There has been no such incident reported in the period. Moreover, KPMG has been our auditors for the past 15 years and this is also an indicator that they are fully satisfied in the way our accounts has been prepared.

In addition, we have an external consultant that reviews and check our internal control system on a monthly basis and Zenith Media is glad to announce that to date, there is no item highlighted by the external party in their risk assessment. The external consultant reports directly to the CEO and CFO, in their monthly reviews of our internal controls.