



HUMANA CHILD AID SOCIETY SABAH

Location:

MDLD 8919, Lot 36, Lorong D'Perdana 11
D'Perdana Square, Bandar Sri Perdana,
91100 Lahad Datu, Sabah
Tel: 089-862600 Fax: 089-862139

Mailing:

P.O.Box 61850,
91127 Lahad Datu,
Sabah, Malaysia

HUMANA CHILD AID SOCIETY SABAH

SOCIAL RESPONSIBILITY POLICY

Document Reference: HCASS-SRP-001

Version: 1.0

Policy Owner: Executive Director

Approved By: Executive Committee / Board of Management

Effective Date: 20th December 2025

Review Date: 1st December 2025

Document Status: Official Policy

1. POLICY STATEMENT

Humana Child Aid Society Sabah (HCASS) is committed to conducting its activities in a responsible, ethical, safe, inclusive and sustainable manner.

As a social organisation serving children and communities, Humana recognises that social responsibility is integral to its organisational purpose and not a separate or stand-alone activity.

Humana is committed to:

- protecting and promoting the rights, dignity and well-being of children;
- maintaining high standards of ethical and professional conduct;
- respecting human rights and labour rights;
- providing a safe and healthy working and learning environment;
- preventing discrimination, harassment, abuse, exploitation, forced labour and child labour;
- maintaining accessible and fair complaints and grievance mechanisms;
- engaging responsibly with communities and relevant stakeholders;
- supporting inclusive and responsible development where relevant to Humana's mandate;
- reducing environmental impacts arising from Humana's operations;
- identifying and reducing greenhouse gas (GHG) emissions associated with its operations; and
- continuously improving its social, environmental and governance practices.

Humana shall implement this Policy in accordance with its organisational vision, mission, Child Protection & Safeguarding System, applicable Malaysian laws and regulations, and relevant RSPO Shared Responsibility requirements applicable to its membership category.



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2. PURPOSE

The purpose of this Policy is to establish a clear organisational framework for Humana's social, ethical, occupational health and safety, environmental and stakeholder responsibilities.

This Policy provides an umbrella framework for:

1. Ethical Conduct;
2. Human Rights and Labour Rights;
3. Child Protection and Safeguarding;
4. Child Labour Prevention;
5. Non-Discrimination and Equal Opportunity;
6. Prevention of Forced Labour and Harassment;
7. Occupational Health and Safety;
8. Complaints and Grievances;
9. Smallholder Inclusion, where relevant to Humana's activities;
10. Environmental Responsibility;
11. Climate Change and GHG Management;
12. Responsible Stakeholder Engagement; and
13. Monitoring and Continuous Improvement.

3. ORGANISATIONAL CONTEXT

Humana Child Aid Society Sabah is committed to providing holistic education and support to marginalised children, including children living in plantation communities in Sabah.

Humana's vision is:

“A world where every child, regardless of background or circumstances, has equal access to holistic education that nurtures their potential and empowers them to build a brighter future.”

Humana's work is therefore centred on ensuring that children are:





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Humana recognises that education and child protection cannot be separated. A child cannot fully benefit from education where the child is exposed to abuse, exploitation, discrimination, unsafe conditions or other forms of harm.

Accordingly, social responsibility is embedded within Humana's organisational governance, educational operations, staff responsibilities and engagement with parents, plantation stakeholders, communities and other relevant parties.

4. SCOPE

This Policy applies to:

- Executive Committee and Board members;
- Executive Director;
- management and administrative staff;
- Coordinators;
- Head Teachers;
- teachers and education personnel;
- volunteers, interns and representatives;
- consultants and contractors engaged by Humana;
- service providers and relevant third parties acting on behalf of Humana; and
- other persons whose activities may affect Humana's operations, children or communities.

The Policy applies to Humana's offices, Pusat Bimbingan Humana, educational activities, field activities, transportation, events, digital communication and other activities conducted on behalf of or under the responsibility of Humana.

5. ETHICAL CONDUCT

Humana is committed to integrity, accountability, transparency and responsible conduct.

All persons acting on behalf of Humana shall:

- act honestly and professionally;
- avoid conflicts of interest and disclose potential conflicts appropriately;
- protect Humana's funds, property, information and other resources;
- maintain accurate and truthful records;
- not engage in bribery, corruption, fraud, theft or dishonest practices;



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- not offer, request or accept improper payments or benefits;
- not use Humana's position or resources for personal advantage;
- make decisions based on legitimate organisational considerations;
- maintain appropriate confidentiality; and
- comply with applicable Malaysian laws and regulations.

5.1 Gifts and Hospitality

Gifts, hospitality, commissions or other benefits shall not be offered or accepted where they may improperly influence, or reasonably appear to influence, an organisational decision.

Any gift or hospitality presenting a potential conflict of interest shall be disclosed to the appropriate supervisor or management.

5.2 Donations and Sponsorships

Donations, sponsorships and financial contributions received or provided by Humana shall be managed transparently and for legitimate organisational purposes.

Humana shall not provide or accept donations or sponsorships for the purpose of obtaining an improper advantage.

5.3 Recruitment and Third Parties

Humana shall seek to ensure that recruitment agencies, contractors and other relevant third parties engaged by Humana conduct themselves lawfully and ethically.

Humana shall not knowingly engage third parties involved in bribery, forced labour, child labour, trafficking, harassment or other serious misconduct.

6. HUMAN RIGHTS AND LABOUR RIGHTS

Humana respects internationally recognised human rights and fundamental labour rights relevant to its operations.

Humana shall promote:

- dignity and respect;
- equal treatment;
- non-discrimination;
- fair working conditions;
- freedom from abuse and harassment;
- freedom from forced or trafficked labour;



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- protection from child labour;
- appropriate occupational health and safety; and
- the right to raise concerns without retaliation.

Humana's human rights commitments shall be implemented in conjunction with its Child Protection & Safeguarding System and applicable Malaysian law.

7. CHILD PROTECTION AND SAFEGUARDING

Child protection is an essential condition for achieving Humana's educational purpose.

Humana maintains a Child Protection & Safeguarding System covering prevention, risk identification, reporting, response, case management, referral, support, monitoring and organisational learning.

The Child Protection framework includes:

- child safeguarding;
- safe and unsafe touch;
- professional boundaries;
- sexual grooming;
- sexual harassment;
- online and digital safeguarding;
- physical and emotional abuse;
- neglect;
- exploitation;
- child labour;
- bullying and harmful behaviour;
- photography, media and information protection; and
- safe educational and field activities.

Humana applies a child-centred, prevention-focused and zero-tolerance approach to serious forms of child abuse and exploitation.



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8. CHILD LABOUR PREVENTION

Humana recognises child labour as a child protection and safeguarding concern where work:

- exposes a child to harm or exploitation;
- involves coercion or unsafe conditions;
- significantly interferes with education;
- prevents regular attendance at school or a Pusat Bimbingan Humana; or
- otherwise compromises the child's rights, development or well-being.

Humana shall respond in a child-centred and non-punitive manner.

Humana shall not:

- shame or punish a child;
- publicly identify a child involved in a child labour concern;
- threaten the child's family;
- remove a child from education as a punitive measure; or
- confront external parties without appropriate direction.

Where necessary, concerns shall be escalated through Humana's safeguarding reporting and referral procedures.

9. NON-DISCRIMINATION AND EQUAL OPPORTUNITY

Humana is committed to providing fair and respectful treatment without unlawful discrimination.

Humana shall not tolerate discrimination or unequal treatment based on characteristics protected by applicable law or on other inappropriate grounds.

Humana shall promote equal opportunity in:

- recruitment;
- employment;
- professional development;
- training;
- workplace participation;
- educational activities; and
- access to organisational support.



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10. PREVENTION OF FORCED AND TRAFFICKED LABOUR

Humana prohibits forced, bonded, trafficked or involuntary labour.

No employee, volunteer, teacher, contractor or other person working with Humana shall be subjected to:

- threats;
- coercion;
- intimidation;
- unreasonable restriction of movement;
- retention of identity documents;
- debt bondage;
- involuntary work; or
- trafficking for labour or other exploitation.

Humana shall take appropriate action where credible concerns are identified.

11. PREVENTION OF HARASSMENT AND ABUSE

Humana maintains a respectful environment free from harassment, abuse, intimidation and degrading treatment.

This includes prohibition of:

- sexual harassment;
- verbal abuse;
- physical abuse;
- threats;
- humiliation;
- bullying;
- sexualised communication;
- inappropriate physical contact;
- grooming behaviour; and
- inappropriate digital communication.

Particular protection shall be provided to children and persons in vulnerable situations.



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12. OCCUPATIONAL HEALTH AND SAFETY

Humana is committed to providing a safe and healthy working environment for employees, teachers, volunteers, children and other persons affected by its activities.

Humana shall identify and manage reasonably foreseeable health and safety risks associated with:

- workplaces;
- Pusat Bimbingan Humana;
- educational activities;
- field activities;
- transportation;
- events;
- emergency situations;
- first aid;
- equipment and facilities; and
- other work-related activities.

Where reasonably practicable, Humana shall implement:

- risk identification and assessment;
- preventive and corrective measures;
- emergency response arrangements;
- first-aid arrangements;
- appropriate training and awareness;
- safe transportation practices;
- appropriate personal protective equipment where required; and
- incident and accident reporting.

Management shall monitor health and safety performance and take corrective action where necessary.

Implementation Note: A dedicated HCASS Occupational Health & Safety Policy and SOP shall be developed to provide detailed operational procedures, responsibilities, risk assessment requirements, emergency arrangements and records.



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13. COMPLAINTS AND GRIEVANCES

Humana is committed to maintaining a complaints and grievance mechanism that is:

- accessible;
- understandable;
- fair;
- confidential where appropriate;
- impartial;
- timely;
- accountable; and
- free from retaliation.

Employees, children, parents, community members, contractors, volunteers and other stakeholders may raise legitimate concerns relating to Humana's activities.

Complaints may include concerns relating to:

- misconduct;
- discrimination;
- harassment;
- workplace safety;
- child protection;
- safeguarding;
- labour practices;
- misuse of resources;
- ethical conduct;
- environmental concerns; or
- other organisational matters.

13.1 Child Safeguarding Concerns

Child safeguarding concerns shall follow the dedicated safeguarding reporting structure.

The established escalation route is:



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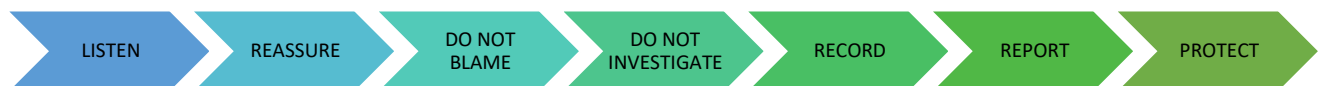


Direct reporting to the Executive Director or Head of HR is permitted where:

- there is immediate danger;
- the concern involves a Coordinator or Head Teacher;
- the concern involves a Humana staff member;
- the person does not feel safe using the normal reporting route; or
- the concern may not be appropriately escalated through the normal route.

13.2 Golden Response Rule

When a child discloses a concern, the person receiving the disclosure shall:



Information shall be handled on a “**need to know, not need to share**” basis.

Retaliation against any person who raises a concern in good faith is prohibited.

Implementation Note: Official reporting telephone numbers, email addresses, emergency contact details and alternative reporting channels shall be inserted before publication of this Policy.

14. SMALLHOLDER INCLUSION

Humana recognises the importance of inclusive and sustainable development within plantation and rural communities.

Where relevant to its mandate and available resources, Humana may support activities that contribute to the inclusion and well-being of smallholders and rural communities through:

- education and awareness;



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- capacity building;
- community engagement;
- knowledge-sharing;
- life-skills development;
- children's education and protection;
- collaboration with relevant organisations; and
- other appropriate community development initiatives.

Humana shall not claim to provide palm oil supply-chain, certification or smallholder services unless such activities are actually undertaken and documented.

Where Humana undertakes a specific smallholder inclusion activity, appropriate evidence shall be maintained, such as:

- project descriptions;
- attendance records;
- photographs where appropriate and consented;
- training records;
- partnership or collaboration documents;
- reports;
- monitoring results; and
- evidence of outcomes or impact.

15. ENVIRONMENTAL RESPONSIBILITY

Humana recognises its responsibility to minimise the environmental impacts arising from its operations.

Humana shall seek to promote responsible practices relating to:

- waste reduction;
- reuse and recycling;
- responsible disposal;
- efficient use of electricity;
- efficient use of fuel;
- responsible use of water;



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- environmentally responsible procurement; and
- awareness among staff and relevant stakeholders.

Environmental practices shall be proportionate to Humana's organisational size, activities and available resources.

16. CLIMATE CHANGE AND GREENHOUSE GAS RESPONSIBILITY

Humana recognises that climate change presents environmental, social and operational risks.

Humana is committed to identifying, monitoring and progressively reducing greenhouse gas emissions arising from its operations.

Where relevant and practicable, Humana shall monitor:

Scope 1

Direct emissions from sources owned or controlled by Humana, such as fuel used in organisational vehicles or equipment.

Scope 2

Indirect emissions associated with purchased electricity consumed by Humana.

Humana shall progressively:

1. identify relevant GHG emission sources;
2. collect appropriate electricity and fuel data;
3. establish a baseline where sufficient data is available;
4. identify opportunities to reduce emissions;
5. implement practical reduction measures;
6. monitor progress; and
7. review the effectiveness of actions periodically.

Potential measures may include:

- reducing unnecessary vehicle use;
- route planning;
- vehicle maintenance;
- reducing unnecessary electricity consumption;
- energy-efficient equipment;
- responsible use of air-conditioning;



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- digital documentation where appropriate; and
- staff awareness.

Humana shall maintain reasonable records to support its GHG monitoring and improvement activities.

17. RESPONSIBLE STAKEHOLDER ENGAGEMENT

Humana recognises the importance of constructive engagement with:

- children;
- parents and guardians;
- teachers and staff;
- plantation management;
- plantation communities;
- government agencies;
- donors;
- partner organisations;
- service providers;
- community representatives; and
- other relevant stakeholders.

Engagement shall be conducted respectfully, transparently and in a manner consistent with Humana's child protection and safeguarding principles.

Where children participate in engagement activities, their safety, dignity, privacy and best interests shall remain paramount.

18. INFORMATION DISCLOSURE AND CONFIDENTIALITY

Humana is committed to responsible transparency.

Relevant information concerning Humana's policies, programmes and organisational commitments may be disclosed through appropriate channels.

However, information relating to safeguarding cases, personal data, confidential complaints, investigations and other sensitive matters shall be protected.

Confidential information shall not be disclosed through:

- staff-room discussions;



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- informal WhatsApp groups;
- social media;
- community gossip; or
- other unauthorised channels.

Information shall only be shared with persons who have a legitimate need to know.

19. TRAINING AND AWARENESS

Humana shall provide appropriate awareness and training to relevant personnel.

Training may include:

- child protection and safeguarding;
- professional boundaries;
- safe and unsafe touch;
- sexual grooming and harassment;
- online safeguarding;
- reporting and case response;
- child labour prevention;
- ethical conduct;
- occupational health and safety;
- emergency and first aid;
- complaints and grievance procedures; and
- environmental and climate awareness.

Training shall be proportionate to the responsibilities and risks associated with each role.

20. RESPONSIBILITIES AND GOVERNANCE

20.1 Executive Committee / Board

The Executive Committee / Board shall:

- provide governance oversight;
- approve this Policy;



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- monitor organisational compliance;
- support accountability and continuous improvement; and
- ensure that significant risks are appropriately addressed.

20.2 Executive Director

The Executive Director shall:

- oversee implementation of this Policy;
- ensure appropriate organisational resources;
- monitor compliance;
- coordinate corrective action;
- oversee significant complaints and safeguarding matters; and
- report relevant matters to governance.

20.3 Head of Human Resources

The Head of HR shall support:

- implementation of ethical and labour-related requirements;
- staff awareness and training;
- workplace conduct;
- complaints and grievance management;
- occupational health and safety coordination; and
- appropriate documentation.

20.4 Coordinators and Head Teachers

Coordinators and Head Teachers shall:

- implement relevant requirements in daily operations;
- supervise staff and educational activities;
- identify risks;
- escalate concerns;
- support safe learning environments; and
- maintain appropriate records.



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20.5 Teachers and Other Personnel

All personnel shall:

- comply with this Policy;
- follow relevant SOPs and codes of conduct;
- protect children and vulnerable persons;
- report concerns promptly;
- maintain professional boundaries;
- respect confidentiality; and
- participate in required training.

21. MONITORING AND CONTINUOUS IMPROVEMENT

Humana shall periodically review the implementation and effectiveness of this Policy.

Monitoring may include:

- safeguarding incident monitoring;
- complaints and grievance records;
- training records;
- health and safety incidents;
- environmental records;
- electricity and fuel consumption;
- GHG monitoring;
- stakeholder feedback;
- corrective actions; and
- relevant RSPO Shared Responsibility reporting requirements.

Where gaps are identified, Humana shall establish appropriate corrective or improvement actions.

22. LEGAL AND REGULATORY COMPLIANCE

Humana shall comply with applicable Malaysian laws and regulations relevant to its operations.

Where appropriate, Humana shall also consider relevant international principles and standards relating to:



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- human rights;
- child rights;
- labour rights;
- occupational health and safety;
- environmental responsibility; and
- responsible organisational conduct.

Where this Policy and applicable law differ, the organisation shall seek appropriate legal or professional advice and apply the legally required standard.

23. RSPO SHARED RESPONSIBILITY COMMITMENT

As an RSPO member, Humana recognises its Shared Responsibility to contribute, within the scope of its organisational role and resources, to the RSPO vision of a global partnership for sustainable palm oil.

Humana shall seek to maintain policies, procedures and activities relevant to applicable Shared Responsibility requirements, including:

- ethical conduct;
- human rights;
- complaints and grievances;
- labour rights;
- child protection;
- occupational health and safety;
- smallholder inclusion where applicable;
- environmental responsibility;
- climate change and GHG management; and
- support for sustainable palm oil.

Humana shall provide accurate information and appropriate supporting evidence when reporting its commitments and implementation through relevant RSPO channels.



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24. DOCUMENT IMPLEMENTATION AND SUPPORTING PROCEDURES

This Policy shall be implemented together with relevant Humana policies, SOPs, guidelines and operational documents.

The existing **HCASS Child Protection & Safeguarding System – Integrated Framework, Policy and Standard Operating Procedures** provides the principal safeguarding framework.

Supporting documents shall include, where applicable:

1. **HCASS Child Protection Policy**
2. **HCASS Child Safeguarding Policy & Code of Conduct**
3. **HCASS Child Protection Reporting & Response SOP**
4. **HCASS Sexual Grooming, Sexual Harassment & Online Safeguarding SOP**
5. **HCASS Child Labour Prevention & Response Guideline**
6. **HCASS Occupational Health & Safety Policy & SOP**
7. **HCASS Complaints & Grievance Mechanism / SOP**
8. **HCASS Environmental and GHG Monitoring Plan**

The documents shall be reviewed periodically to ensure consistency and effective implementation.

25. DOCUMENT CONTROL

Item	Details
Document Title	Humana Child Aid Society Sabah Social Responsibility Policy
Document Reference	HCASS-SRP-001
Version	1.0
Policy Owner	Executive Director
Approval Authority	Executive Committee / Board of Management
Effective Date	20 th December 2025
Review Cycle	At least every two years or when significant changes occur
Controlled Copy	Humana Child Aid Society Sabah
Public Availability	Subject to organisational approval



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26. APPROVAL

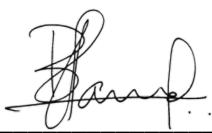
This Social Responsibility Policy has been reviewed and approved by the authorised governance body of Humana Child Aid Society Sabah.

Approved by:

Executive Committee / Board of Management
Humana Child Aid Society Sabah

Name: Brian John Lariche

Position: Chairman, Executive Committee

Signature: 

Date: 19th December 2025

HUMANA'S COMMITMENT

Humana Child Aid Society Sabah is committed to ensuring that its organisational activities contribute positively to the protection of children, the dignity of people, the well-being of communities and responsible environmental stewardship.

Humana will continue to strengthen its systems, practices and capacity through continuous learning, responsible governance, meaningful stakeholder engagement and practical implementation.

