

(Translation)
Human Rights Policy and Guidelines for Respecting Human Rights
(Revised Edition 2025)

Saha Pathanapibul Public Company Limited (the "Company") recognizes and prioritizes the critical importance of ethical business practices. The Company is dedicated to social responsibility and accountability towards all its stakeholders. It places a strong emphasis on respecting human rights, which is integral to its business activities. The Company has developed a "Human Rights Policy and Guidelines on Respecting Human Rights" to affirm its commitment to uphold, advocate for, and safeguard fundamental rights and human dignity for all individuals, including employees and stakeholders engaged in the Company's activities. This policy is in accordance with legal standards and international human rights principles, as articulated in the Universal Declaration of Human Rights (UDHR). It reflects the Company's dedication to social responsibility within the framework of sustainable organizational development.

Scope

This Human Rights Policy and Guidelines for Respecting Human Rights apply to the business operations of Saha Pathanapibul Public Company Limited and its subsidiaries. Additionally, it promotes awareness among partners, business associates, and stakeholders, urging them to adhere to the same principles for consistent practices.

Duties and Responsibilities

1. Board of Directors

1.1) Evaluate and endorse the Human Rights Policy and Guidelines for Respecting Human Rights, conducting an annual review to mitigate the risk of human rights infringements and labor-related concerns throughout all company activities, products, and services, including those of subsidiaries and partners.

1.2) Ensure business operations comply with relevant laws, regulations, and policies.

2. Executives

2.1) Establish appropriate procedures suitable for the business context and in line with national policies, regulations, requirements, and laws where the business operates.

2.2) Establish an appropriate responsible unit or task force comprising representatives from relevant departments to drive the organization's human rights and labor practices.

2.3) Promote, support, and instill human rights principles and labor practices among personnel through various activities related to business operations and aligned with the company's context.

2.4) Monitor and ensure adherence to policies and guidelines, including having internal control mechanisms and improvement methods to enhance implementation effectiveness, along with continuous reporting of performance in line with policies and guidelines.

3. Employees

3.1) Learn, understand, and comply with relevant laws, regulations, international standards, and this policy and guidelines.

3.2) When expressing personal opinions, maintain the company's image and protect its reputation by not using the company's name, information, or assets, or implying representation of the company.

3.3) When witnessing any violations or potential breaches of this policy and guidelines, report or file a complaint through the designated whistleblower channels as per the Whistleblower Policy and Guidelines.

Human Rights Policy

The company's board of directors, executives, and employees uphold the principle of human dignity and ensure equitable treatment for all stakeholders. The company is committed to providing equal opportunities without discrimination based on race, color, gender, age, religion, language, education, disability, social status, political beliefs, or any other identity. This commitment aligns with legal requirements and international human rights standards. The company will operate with thorough diligence to avoid any infringement of human rights in its activities.

Guidelines for Respecting Human Rights

1. The company supports and respects the protection of human rights, ensuring that neither its business nor its employees are involved in human rights violations. This commitment encompasses the prohibition of forced labor, the avoidance of child labor, and the rejection of any form of physical or psychological harassment or abuse. Additionally, the company rigorously complies with labor protection laws and standards.

2. The company respects and follows international employment principles, ensuring equitable treatment for all stakeholders. It offers equal opportunities to all individuals, free from discrimination, and upholds fundamental rights regardless of gender, age, religion, race, physical ability, political beliefs, or any other characteristics. This commitment includes fair remuneration, a safe working environment, the freedom to associate, and the right to engage in collective bargaining.

3. The company fosters a workplace that prioritizes good, convenient, and safe conditions, along with a strong emphasis on occupational health and safety for its employees.

4. The company oversees its subsidiaries, partners, and stakeholders to guarantee compliance with international human rights standards and the protection of partners' rights. This involves ensuring equitable treatment of partners, establishing transparent procurement practices to foster fair competition, and motivating partners to uphold human rights principles. Furthermore, the company is committed to safeguarding the rights of stakeholders affected by rights violations arising from its business activities, in accordance with legal requirements.

5. The company treats stakeholders such as customers and partners equally and without discrimination, respecting the rights of consumers and customers. This includes fair treatment, non-violation of personal data, and other fundamental rights.

6. The company conducts its business with consideration for the negative impacts on the economy, natural resources, environmental quality, ecosystems, culture, society, livelihoods, health, safety, privacy, and other human rights issues in the community. It values community rights, actively seeks community input, and encourages community involvement.

7. The company has established a comprehensive Human Rights Due Diligence Process (HRDD), which includes defining the scope of assessment and identifying human rights issues related to business and stakeholders, assessing human rights risks, and disclosing the human rights due diligence process in the company's Form 56-1 One Report.

8. The company welcomes complaints or reports regarding human rights violations connected to its operations, including activities of the company, businesses under the company's management control, and/or the supply chain, through the complaint channel via email at Humanrights@sahapat.co.th.

9. The company has established measures to protect employees or individuals who report human rights violations or unequal treatment. These individuals will receive fair and safe protection according to the measures outlined in the company's code of conduct for directors, executives, and employees.

10. The company gathers and preserves reports regarding the outcomes of human rights impact assessments and labor practices. These reports are submitted to the relevant committee at a minimum of once annually.

Communication and Policy Dissemination

The company guarantees the communication and distribution of its human rights and labor practice policies and guidelines by implementing suitable training sessions, meetings, and various activities. These are provided to directors, executives, employees, and external stakeholders, including partners, business allies, joint ventures, and the public throughout the value chain. Furthermore, the company conducts effectiveness evaluations following each training session.

Whistleblowing

Individuals who observe actions that they believe contravene this policy and its guidelines are encouraged to report their concerns in accordance with the established whistleblowing policy and procedures. Whistleblowers or complainants will be afforded protection, and their identities will be kept confidential. There will be no repercussions on their employment status during the investigation or following its resolution.

Penalties

All employees are required to fully cooperate with both internal and external agencies during any investigation. Any actions taken by executives or employees that contravene or do not adhere to this policy and its guidelines, whether directly or indirectly, will result in disciplinary measures in line with the company's work regulations.

This Human Rights Policy and Guidelines for Respecting Human Rights will be effective starting in October 23, 2025.