

**Human Rights and Labor Practices Policy** 

Remark: This policy has been approved by Board of Directors on 1 October 2024



## 1. Principle

CP Axtra Public Limited Company (the "Company") is committed to respecting fundamental human rights and Labor practices with continuous effort to operate the business sustainably through employees, customers, suppliers, and other stakeholders along the supply chain. The Company aims to protect human rights against discrimination & harassment and also provide equal opportunity for capability development.

The Company respects fundamental human rights and Labor practices in every country where the Company operates and adherences to follow international principles and practices such as the Universal Declaration of Human Rights: (UDHR), the Ten Principles of the United Nations Global Compact (UN Global Compact), UN Guiding Principles on Business and Human Rights (UNGPs), Declaration on Fundamental Principles and Rights at Work and International Labor Organization (ILO).

## 2. Scope

This policy applies to the business operation of CP Axtra Public Limited Company and its subsidiaries, own operation and supply chain including supplier, vendor, and partners.

#### 3. Objective

- 3.1 To prevent any form of negative impact on, or violations of human rights, associated with the Group's operations, products and services throughout the value chains
- 3.2 To protect its employees from all types of discrimination, harassment, and unfair labor practices; to foster a collaborative work environment and equal opportunities for career development.
- 3.3 To promote collaboration with suppliers and stakeholders, strengthening human rights and labor practice along the Group's value chains in line with the Group's policy and guidelines, as well as international best practices.

## 4. Roles and Responsibilities

- 4.1 Sustainability Development Committee
  - 4.1.1 Establish the structure and responsibility for the human rights and Labor practices as the working team in which members are assigned leaders from every related department to drive the organizational performance to comply with this policy and related requirement.
  - 4.1.2 Endorse this policy, support and oversee the compliance to prevent violations of Human Rights and Labor Practices in all business activities of the Company including in its business value chains and concerned stakeholders.



- 4.2 Human Rights Due Diligence Working Team
  - 4.2.1 Define and periodically review the human rights and Labor practice policy and guidelines to prevent any human rights violation within the Company's business operation include the business value chain and business partner.
  - 4.2.2 Define and update the related procedure based on business context and compliance with this policy and related requirements in each country where the Company operates.
  - 4.2.3 Implement the Human Rights Due Diligence process which consists of the following:
    - 1) Integrated roles and responsibilities of human rights and Labor practices risk management to functional leader's objectives and targets.
    - Review feedback from stakeholder groups and management including plan the corporative process with other potentially affected groups and stakeholders.
    - Conduct human rights impact assessment by gathering and assessing salient issues from stakeholders.
    - 4) Identify proper remediation measures to reduce the impacts also the preventive measures and action to mitigate the internal and external risks.
    - 5) Track and monitor the effectiveness of preventive measures and whistleblowing mechanisms.
    - 6) Communicate the human rights impact assessment, remediation measure, status of case correction that is addressed from human rights violations.
    - 7) Engage all relevant groups through open dialogue or feedback with affected groups, human rights experts and civil society organizations.
    - 8) Provide the effective grievance and remediation mechanism are in place for who is affected by human rights and Labor practices violations and witness must be protected as confidentiality except required by regulation.
  - 4.2.4 The related document and information of human rights and Labor practices impact are collect and retain with proper record keeping.
  - 4.2.5 Report the compliance of human rights and labor practices to the Sustainability Development Committee and the involved functional management at least once annually.

#### 4.3 Functional Management

4.3.1 Communicate the human rights and labor practices policy and the objective to all employees and stakeholders in the supply chain which is under responsibility for appropriate awareness and practice.



4.3.2 Supervise all employees under responsibility to ensure they understand this policy and guideline include encourage them to inform if find any risk that potentially against this policy.

#### 5. Guideline

To promote human rights and labor practices within the whole organization and assure the employee including stakeholder groups are protected their rights as equality and fairness. The written guideline for implementation are following by

## 5.1 Respect for Human Rights

## 5.1.1 Civil and Political Rights

- Encourage diversity and inclusion to all employees to foster coexistence on the basis of equality.
- Any harassment that might create any violence, intimidation, hostile or unfriendly work environment is not permitted include verbal, written, physical or mental harassment.
- Any harassment action that might interfere with other employee's work performance or cause a nuisance is not permitted.
- 4) Sexual harassment and other immoral behaviors are not permitted. Such behavior includes molestation, indecent exposure and obscene acts both physical and verbal, all of which can cause the victim to be humiliated, intimidated or offended.
- 5) Any restrictions on freedom of expression and freedom to participate in political activities are not allowed, as they are both fundamental human rights. On the contrary, the mentioning of CP Axtraor the use of the Company's asset in political activities are not permitted under any circumstance.

#### 5.1.2 Economic, Social and Cultural Rights

- Employees are entitled to access to social security, medical insurance and other welfare benefits.
- Provide the resting hour during working days, monitor and control the working hours that do not exceed local Labor regulations and full remunerations during public holidays.
- Infringement on employees' rights to perform their religious and cultural activities are not permitted.



## 5.1.3 Gender Rights

- Respect employees' rights to gender equality and diversity in gender, sexual orientation, gender identity, or gender expression.
- 2) Promote good practice by preventing sexual harassment and violation in any form.
- Respect employees' right to privacy by not forcing employees to disclose or conceal their identity, sexual orientation, and gender identity.
- 4) Ensure the security and privacy of information relating to sexual orientation, gender identity, gender expression, or sexual characteristics, which are not to be disclosed without the consent of the employee.
- 5) Promote equality and non-discrimination by providing gender-neutral recruitment and equal benefits and compensations, opportunities for career advancement and professional development in all areas.
- 6) Promote the right to equitable healthcare by providing the appropriate space, uniform or dress code, and facilities for all and genders.

# 5.1.4 Community Rights

- Respect the rights and freedom of expression and opinions of the community, especially vulnerable groups such as minority groups, indigenous people, and ethnic groups.
- 2) Consider the negative impacts of business operations on the community's economy, natural resources, environmental quality, culture, society, way of life, hygiene, health, safety, privacy, and other human rights of people in the community.
- 3) Assess human rights impacts before engaging in new investments, mergers, and acquisitions, or initiating new business operations in a community by including the health, environment, and society of the community in the decision-making process.
- 4) Evaluate any action to be taken towards or within the community through a transparent, equitable, and non-discriminatory process in compliance with local laws.
- 5) Support the community's access to clean, safe, and adequate water.
- 6) Support the community's right to clean air.

## 5.1.5 Human Rights in the Supply Chain

 Inspect and trace the sourcing, processing, and distribution of raw materials in accordance with human rights principles across the supply chain.



2) Procure raw materials and components from organizations and individuals not involved in illegal activities, human rights violations, or terrorism. This includes not importing, buying, selling, or exchanging verified conflict minerals or products made from them.

## 5.1.6 Right to Land and Natural Resources

- Respect the rights and freedom to use of land and water resources throughout the value chain, in compliance with the law and relevant local and international regulations.
- 2) Respect the land rights of farmers and local communities, including using proper land management to minimize negative impacts on surrounding communities.
- Respect the right of communities and indigenous peoples to maintain their way of life, cultural traditions, and access to their traditional lands and resources.
- 4) Respect the land right of individuals or local communities by not engaging in unfair business practices.
- 5) Acquisition of land must be carried out in accordance with the FPIC principle: free, prior, and informed consent, inspect and verify land rights and titles when establishing new business operations.

## 5.1.7 Personal Data Privacy Rights

- Respect the right to privacy of data subjects by always obtaining their consent before processing, disclosing, or controlling their personal data.
- Secure all personal data under supervision as well as determine procedures in relation to the collection and management of personal data.
- 3) Respect the rights of data subjects in the retention, processing, disclosure, erasure, and disposal of their personal data, as well as the right to suspend and withdraw their consent in compliance with the law.

#### 5.2 Labour Practices Guideline

### 5.2.1 Human Trafficking and Forced Labour

Strictly prohibit any practice related to human trafficking and forced Labor to the employees, subcontractors, or subcontractor's employees including coercion, penalty or forcing the workers to work unwillingly such as involuntary work, coercion with intimidation, physical violence, sexual abuse, restriction of movement, withholding or non-payment of wages, debt bondage or retains their identity documents, etc.

- Support ethical recruitment and employment in all of the Group's business operations and value chains, including its suppliers.
- Treat workers fairly and do not use forced labor in any form, in compliance with local and international labor laws and standards.



- Treat workers in a humane manner; do not use physical or mental coercion and other inhumane treatment; do not engage in any practice associated with modern slavery or human trafficking.
- 4) Establish working days and hours and other terms of employment in compliance with local labor laws.
- 5) Respect workers' freedom of movement by not detaining them, charging them for deposits, charging fees for or seizing their identification documents or belongings, unless done under the law.
- 6) Charge no deposit or recruitment fees.

#### 5.2.2 Child Labour

- Establish a pre-employment age verification system to prevent the employment of child labor under the legal age of local laws.
- 2) Prohibit the hiring of child Labor based on criteria within local applicable laws and regulations as below detail:
  - (1) Ensure they work in a safe work environment that does not pose a risk to their health, development, or mental state.
  - (2) Ensure they perform work that is not contrary to their morals.
  - (3) Ensure their work does not affect their compulsory education.
  - (4) Ensure they work only during periods specified as legal by local laws.
- 3) Ensure that wages are paid directly to youth workers without deducting any deposit.
- 4) Promote their education and self-development during the course of their employment.

# 5.2.3 Female Workers and Pregnant Workers

- Promote female workers to work in safe areas and activities that are not hazardous to their health and do not pose safety risks for female and pregnant workers.
- Provide protections and benefits to pregnant women as prescribed by regulatory bodies and local laws.
- Respect the right of pregnant women to work by not using pregnancy as a reason for termination, demotion, or reduction of salaries.

## 5.2.4 Elderly Workers

1) Provide opportunities for healthy elderly people to work; the nature of their work must not be harmful to their health or safety.



 Provide benefits and compensations for elderly workers according to the local labor laws of each country.

#### 5.2.5 Disabled Workers

- Promote the right of disabled people to work and ensure that disabled workers are assigned appropriate work; provide work facilities suitable to their work and condition of their disabilities.
- Ensure that the employment of disabled people is in compliance with the local laws of each country the business operates.

## 5.2.6 Migrant Workers

- Carry out the migrant worker hiring process ethically and lawfully, without discrimination or any forms of forced labor and human trafficking.
- 2) Provide fair compensation and welfare to migrant workers.
- Supervise and monitor the recruitment of migrant workers to ensure it is in compliance with local laws.

## 5.2.7 Zero Tolerance for Discrimination and Equal Remuneration

- Strictly prohibit any discrimination towards the employee under any circumstance or action that bring inequality or inferiority due to prejudice even non-related working issue.
- 2) Strictly prohibit any discrimination towards job applicants. The criteria as age, gender, race, physical or mental disability, religion and marital status are not permitted to apply as the job requirement and qualification of recruitment.
- 3) Salaries, wages and benefits are to be paid on time, in compliance with legal requirements.
  The deduction from employees' wages are not allowed, except if local regulation states.
- 4) Remuneration is equal for both men and women for equal job value and responsibility.
- 5) Employee's development program must be equally arranged without discrimination while also depending on their training needs for current position and career progression.
- 6) Determine and disclose the employees' performance evaluation criteria.
- Feedback employee's performance evaluation results in a transparently and fairly manner for their performance improvement.
- Job transfer and rotation must be conducted with equality and fairness for career progression without any discrimination.



- Dismissals must be on principles of unqualified performance evaluation criteria, disciplinary action, health reasons based on medical diagnosis, or other reasons which are not discriminatory. An appeals process should also be established in compliance with local laws.
- 5.2.8 Right to access to clean water and sanitation and clean air
  - Provide working conditions and environments that are safe, hygienic, and in accordance with industrial hygiene principles.
  - 2) Provide adequate clean water that is safe for consumption according to hygiene standards; maintain cleanliness and hygiene of water containers, cups, dispensers, and all other items that may come into contact with drinking water.
  - 3) Provide safe water for consumption and restrooms according to hygiene standards. The water should be sufficient, hygienic, and accessible to personnel of all genders and members of vulnerable groups.
- 5.2.9 Freedom of Association and Right to Collective Bargaining
  - The assembly is permitted under the conditions that gatherings are peaceful, do not involve weapons, do not compromise work performance, and do not violate local laws or the Company's Code of Conduct.
  - Respect the rights and freedom of association and the right to collective bargaining, including the freedom of assembly, in compliance with the law.
  - 3) Respect the rights and freedom of expression of human rights defenders by not retaliating against their involvement in protecting human rights and the environment, protests against the business, or expressing their social and political opinions which are lawful and appropriate, on the condition that they are conducted outside working hours and company premises. The Company shall not support or engage in SLAPP, or Strategic Lawsuits Against Public Participation, which is carried out in good faith.

## 6. Training

The Company shall communicate and cascade the Human Rights and Labor Practices Policy and Guidelines through training programs, conferences, and other appropriate channels to its directors, management, and staff, as well as suppliers, business partners, joint ventures, and other stakeholders within the Company's value chain, which may include members of the general public. The effectiveness of training shall be evaluated after each session.



## 7. Whistleblowing

File complaints or blow the whistle related to this Policy and Guidelines according to the Whistleblowing Policy and Guidelines. All whistleblowers or reporters shall be protected from retaliation regarding their employment status, with their information to be kept confidential both during and after the investigation processes.

#### 8. Policy Guidance

If there are any inquiries regarding the action that may violate laws, regulations, and this Policy and Guidelines, employees can seek guidance from their supervisors, teams, or persons responsible for monitoring human rights and labor practices within the Company, the Compliance Department, or Legal Department before carrying out any decision or action.

#### 9. Penalties

All employees must fully cooperate with internal and external authorities in the event of an investigation. Any direct and indirect violations or failure to comply with this Policy and Guidelines by management and staff will be subject to disciplinary action in accordance with Company's regulations and also considered the employee's remuneration and performance evaluation.

This policy implementation is consistent with the intent of the Company based on the core philosophy "3-Benefit to Sustainability (for the Country, People and Company)" that operates on good governance, social and environmental responsibility. This includes encouraging business partners to grow responsibility together in accordance with the international practice for sustainability development.