

## 7.2 Human Rights Management



The Company is committed to protecting and promoting human rights across all dimensions of its business operations, upholding them as fundamental entitlements and a key principle in fostering an equitable working environment. The Company believes that embracing diversity and treating employees, suppliers, and communities equally not only helps reduce the risk of human rights violations, but also serves as the foundation for conducting business ethically to create shared value for all stakeholders.

The Company upholds and develops its operations in alignment with international standards and national regulatory frameworks to enhance stakeholder confidence, as follows:

### The Company's Human Rights Policy

- United Nations Guiding Principles on Business and Human Rights (UNGPs): Integrating the principles of "Protect, Respect and Remedy" into business processes.
- Business Ethics: Establishing clear operational guidelines covering fair employment practices, prohibition of child and forced labour, and promotion of workplace safety.
- Human Rights Due Diligence (HRDD): Conducting impact assessments and managing risks in accordance with the Human Rights Impact Assessment and Management (HRIAM) framework to identify and prevent human rights violations throughout the supply chain.

### Human Rights Practices and Employee Education

The Company has continuously implemented its Human Rights Policy by assessing human rights issues across 4 stakeholder groups, namely: 1) Employees and Subcontractors, 2) Customers, 3) Suppliers, and 4) Communities and Society, categorized into 2 groups of practices as follows:

#### Group 1: Internal Stakeholders (Employees and Subcontractors)

The Company places great importance on protecting the rights of employees and subcontractors at all levels by establishing Fair Labour Practice guidelines, incorporating them into the official work regulations, and communicating them in both Thai and foreign languages for foreign employees. Furthermore, the Company is a member of the UN Global Compact to strengthen labour standards in alignment with applicable laws and international principles, covering the following key issues:



Issue	Practice Guidelines
<p><b>1. Fundamental Rights and Freedoms</b></p> <p><b>Freedom of Expression</b></p> <p><b>Freedom of Association</b></p> <p><b>Right to Collective Bargaining</b></p>	<p>Encourage employees at all levels to express their opinions openly and constructively through multiple channels, such as suggestion boxes, internal online systems, employee meetings, and official complaint channels, with a transparent process for receiving and responding to suggestions.</p> <p>AssociationSupport employees' right to form associations in accordance with applicable laws and human rights principles, without obstructing or interfering with any such associations, and provide appropriate guidance within legal frameworks.</p> <p>Respect employees' right to collective bargaining, with the Welfare Committee appointed as employee representatives, and conduct negotiation meetings as required by law on a regular basis.</p>
<p><b>2. Equality and Diversity</b></p> <p><b>Non-Discrimination</b></p> <p><b>Organizational Diversity</b></p> <p><b>Employment of Underprivileged Individuals</b></p>	<p>Committed to fostering an equitable organizational culture by applying principles of ability and suitability in all processes, free from discrimination based on race, religion, gender, age, or personal status, with mechanisms in place to handle discrimination-related complaints.</p> <p>Support diversity within the organization by providing opportunities for individuals of all genders, ages, nationalities, races, and backgrounds to collaborate and grow within the organization to their full potential.</p> <p>Support inclusive employment by offering job opportunities to people with disabilities and other disadvantaged groups, with appropriate facilities, training, and working environments tailored to individual needs.</p>
<p><b>3. Employment Conditions and Compensation</b></p> <p><b>Working Hours</b></p> <p><b>Minimum Wage Compliance</b></p>	<p>Strictly comply with regulations regarding working hours, overtime, and holidays in accordance with labour laws, with systems in place to record and monitor overtime hours to maintain appropriate levels, and compensate overtime at rates prescribed by law.</p> <p>Provide compensation that surpasses the minimum wage required by law and regularly review the compensation structure to align with the cost of living and industry trends, ensuring fairness for workers at all levels.</p>

Issue	Practice Guidelines
<b>Equal Compensation</b>	Adhere to the principle of equitable compensation by basing pay on overall performance and individual contributions, with no bias toward any group, and regularly monitoring and reviewing wage disparity.
<b>4. Protection and Safety</b>	
<b>Prevention of Child and Forced Labour</b>	Strictly prohibit all forms of child and forced labour, with a rigorous system for verifying employee age and employment documents prior to commencement of work, including retaining copies of required documents as specified in the employment contract.
<b>Child and Forced Labour Risk Assessment</b>	Conduct child and forced labour risk assessments at all operational sites on an annual basis, covering 100% of operational areas, by considering current risk factors such as industry conditions, sources of labour supply, and the volume of migrant workers. All employees may report concerns through the Company's complaint channels, which are safe, accessible, and confidential.
<b>Workplace Harassment Prevention</b>	Committed to creating a work environment free from harassment, intimidation, or violence, by communicating the anti-harassment policy to all employees, and providing safe and accessible channels for reporting complaints to protect complainants.
<b>Protection of Personal Data</b>	Safeguard the personal data of employees and customers in strict compliance with the Personal Data Protection Act (PDPA), limiting access to authorized personnel only, and ensuring data is not used for purposes beyond the scope of consent.
<b>5. Development and Promotion</b>	
<b>Support for Children's Rights</b>	Create opportunities for youth through promoting and supporting education, including scholarships for employees' children and students in local communities, as well as intern development programs in collaboration with both public and private sector educational institutions.

## Group 2: External Stakeholders (Customers, Suppliers, and Communities)

The Company monitors and manages human rights impacts on external stakeholders both directly and indirectly, covering the following key practices:



### Customers

Respect customer rights as individuals, safeguard personal data in strict compliance with the Personal Data Protection Act (PDPA), and refrain from using customer data beyond the purposes for which consent has been granted.



### Communities

Maintain a systematic mechanism for receiving feedback and complaints from communities, while monitoring and assessing impacts that may arise from business operations, such as pollution and noise.

The Company also implements appropriate site remediation measures and refrains from engaging in activities that obstruct access to natural resources or the fundamental rights of local communities. This includes promoting employment opportunities within the area, without any policy of restricting or blocking local community members from working, so that communities genuinely benefit from the Company's business operations.



### Suppliers

Treat suppliers fairly and respect their contractual rights, encourage suppliers to uphold human rights principles, and require human rights self-assessments as part of the procurement criteria.



The Company continuously communicates its Human Rights Policy to employees through internal channels, such as meetings, internal announcements, the intranet system, and work-related documents, as well as communicating to external stakeholders. The Company also conducts training and testing for employees at all levels to strengthen understanding and reduce the risk of human rights violations.

In 2025, the Company launched the "Corporate Governance Knowledge Refresh and Update 2025" program to enable employees at all levels to refresh their knowledge and update their understanding of corporate governance through an e-Learning system, accessible and assessable instantly via QR Code. One of the key modules in the program covers Human Rights, comprising 4 training topics as follows:

#### Target:

100% of employees complete training and pass the assessment.

#### Performance:

**100% of employees completed training and passed the assessment.**



Fundamental Human Rights



Respecting Diversity and Differences



Child Labour Rights



Forced Labour Rights

## Management of Non-Compliance

If the Company identifies any practices that violate the Fair Labour Practice Guidelines or involve breaches of employees' fundamental rights, the Company has established the following response framework:

- Conduct fact-finding investigations with fairness and transparency, protecting the anonymity of complainants and adhering to good governance principles.
- Provide corrective opportunities for cases resulting from misunderstandings or inappropriate internal processes.
- Apply disciplinary measures for serious offenses or cases with clear intentional breaches of guidelines.
- Provide remediation to affected parties, including compensation, medical treatment, or reinstatement of violated rights.
- Review and continuously improve internal control procedures to prevent the recurrence of such incidents.

## Human Rights Risk Assessment

The Company conducts a comprehensive Human Rights Due Diligence (HRDD) process, covering 5 key steps as follows:



## Human Rights Risk Issues

In 2025, the Company conducted Human Rights Due Diligence (HRDD) assessments covering 100% of all operational sites, to systematically and proactively identify, assess, and manage potential human rights risks. Risk issues are categorized by the severity of impact and the relevant stakeholder groups affected, as follows:

### Target:

Human rights risk assessments conducted at 100% of the Company's operational sites.

### Performance:

**Human rights risk assessments conducted at 100% of the Company's operational sites.**

**Summary of Human Rights Risk Assessment Results for 2025:** The assessment covers 8 key issues, with a focus on analyzing risk levels affecting employees, business partners, communities, and government sectors, along with concrete preventive and remedial measures.

## Risk Issues and Impact Levels



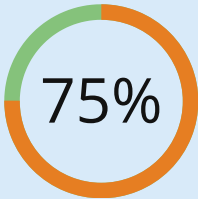
**High**

**Incidents resulting from insufficient PPE represents the highest level of risk.**

Ensuring adequate PPE supply and full medical care coverage.



Employee



**75% of risk issues covering supply chain, employment, and community impact are at a moderate level.**



**Moderate**

**Failure to communicate policies within the supply chain**



Suppliers  
Customers



**Moderate**

**Business partners lacking self-assessment**



Suppliers



**Moderate**

**Discriminatory practices in hiring / promotion**



Employees



**Moderate**

**Unfair compensation for temporary workers**



Employees



**Moderate**

**Pollution or impact on communities**



Communities



**Moderate**

**Labor risks in new projects**



Employees  
Suppliers



**Use of resources in disputed areas** **Low**

Material origin verification policy in place, with immediate partner replacement upon violation.



Suppliers  
Customers

## Risk Management Strategy



### Proactive Preventive Measures

- Regularly communicating policies to business partners and requiring annual human rights self-assessments.
- Requiring annual ESG self-assessments from business partners, with Onsite Audits.
- Applying fair employment policies with transparent promotion processes.
- Reviewing compensation to ensure compliance with laws and industry standards.
- Establishing procurement guidelines for new projects in compliance with labor laws.
- Conducting regular emissions audits with legally compliant control measures.
- Implementing a Conflict Minerals policy with regular material origin verification.



### Fair Remediation

- Suspending or reviewing business partner status in cases of non-compliance.
- Providing safe reporting channels with appropriate investigation and follow-up.
- Conducting investigations and impact remediation in a fair manner.
- Providing wage compensation upon finding below-standard pay.
- Re-auditing labor violations and compensating affected employees.
- Transparently disclosing information to communities, implementing restoration measures, and providing damage compensation.
- Requiring immediate change of sourcing location upon finding conflict minerals-related violations.

## Complaint Mechanism and Remediation for Human Rights Violations



The Company has established a systematic mechanism for receiving complaints and providing remediation to ensure that individuals and communities adversely affected by the Company's business operations are treated appropriately and fairly. The Company transparently discloses information about this mechanism, covering complaint procedures, confidentiality, and anonymity. The Company is committed to providing remediation to affected parties in an appropriate and fair manner on a case-by-case basis.

### Complaint Channel:

<https://www.satpcl.co.th/th/corporate-governance/whistleblowing-notice/whistleblowing-notice-policy>

## Human Rights Performance 2025

KPI	Target 2025	Performance 2025
Number of human rights violations within the organization	0 cases	0 cases
Number of non-compliance cases with labour standards	0 cases	0 cases

