

7.2 Human Rights



The Company is dedicated to protecting and promoting human rights across all aspects of its business operations. Human rights are fundamental entitlements from birth, and equality is a core principle for fostering a positive society and work environment. The Company encourages collaboration with all relevant parties to address diverse issues, thereby mitigating risks that could lead to human rights violations. This includes creating a safe working environment, treating suppliers equitably, and controlling pollution that might impact communities. The Company upholds ethical practices and respects the rights of all individuals, with the goal of contributing to a better world for everyone involved.

The Company's Human Rights Policy

The Company places high importance on compliance with human rights principles and is committed to adhering to international standards, including: the United Nations Guiding Principles on Business and Human Rights (UNGP), the Human Rights Impact Assessment and Management (HRIAM) guidelines, and recommendations from the Stock Exchange of Thailand (SET). The Company has integrated these essential guidelines to develop a comprehensive human rights due diligence process, as outlined in the Company's Human Rights Policy and incorporated into the manual of Business Ethics and Code of Conduct, which provides clear operational guidelines.

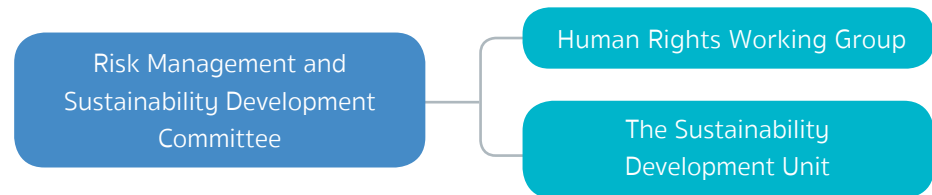
1. Human Rights Governance Structure and Working Group

The Risk Management and Sustainability Development Committee

directly oversees human rights, playing a crucial role in setting policy direction, monitoring implementation, and evaluating the effectiveness of related measures. This ensures the Company's operations align with universal human rights principles.

In 2024, the Company officially established a Human Rights Working Group to enhance the efficiency of specific human rights risk management. This working group comprises executives and employees from relevant departments, including Human Resources, Procurement, Manufacturing, and Safety. This diverse representation ensures a comprehensive perspective and specialized expertise across various human rights aspects. The Sustainability Development Unit supports and coordinates the working group's efforts on related issues, ensuring the Company's human rights initiatives are effective and consistent with organizational policies and practices.

The working group is primarily responsible for assessing human rights risks that may arise across the Company's value chain and for planning and executing preventive and mitigating measures. This includes consideration of various factors such as working conditions, treatment of suppliers and customers, environmental management, and other elements that may impact human rights.



Additionally, the working group is responsible for continuously monitoring and evaluating performance to ensure that implemented measures effectively prevent and mitigate human rights risks. They also adapt operational plans to suit evolving situations and emerging needs.

2. Human Rights Practices and Employee Education

In 2024, the Company reviewed and updated its Human Rights Policy and defined clear operational guidelines, considering a broad spectrum of human rights issues relevant to all stakeholders. This involved an assessment of human rights considerations across four key areas: 1) Employees and Subcontractors, 2) Customers, 3) Suppliers, and 4) Communities and Society. This assessment was conducted by teams from Human Resources, Procurement, Manufacturing, and Sales, underscoring the commitment to respecting and upholding human rights for all stakeholders. The Company also conducted human rights risk assessments at both departmental and organizational levels, as follows:

- Treat everyone equally based on human rights principles, without discrimination.
- Prohibit the use of forced labor within the Company's supply chain, including child labor, foreign labor, or compulsory overtime.
- Treat all organizational stakeholders equitably, including customers and suppliers.
- Respect customer rights, ensuring no violation of personal data.
- Respect supplier rights, treating them fairly and promoting their adherence to human rights principles.
- Respect community rights, listen to their feedback, support their participation, and not obstruct access to natural resources and the environment.

The Company has consistently communicated its Human Rights Policy to employees through internal channels such as meetings, internal announcements, the intranet system, and work-related documents. This policy is also communicated to stakeholders, including customers, suppliers, and communities, to ensure consistent operations throughout the entire supply chain.

Furthermore, the Company conducts training and testing for all employees to enhance their understanding of human rights principles and appropriate workplace practices. The goal is to ensure practical application across all dimensions of the business operations and to mitigate the risk of human rights violations within the organization's activities.



Key Performance Indicator

2024 Target

100%

2024 Performance

98%

3. Fair Labor Practice Guidelines and Related Operations

In addition to the establishment of a Human Rights Policy, the Company has implemented Fair Labor Practice Guidelines, which emphasize respect for fundamental labor rights, non-discrimination, and the promotion of workplace equality. These guidelines have been communicated to all employees in both Thai and translated foreign languages to ensure foreign staff have full understanding. The guidelines are also clearly included in the Company's official work regulations.

Furthermore, the Company is a participant in the UN Global Compact, a collaborative initiative aimed at enhancing the organization's labor standards to align with both national laws and international principles. The operational guidelines and management approach for each key area are as follows:

- **Freedom of Expression** The Company respects and encourages employees to express their opinions openly and constructively through designated channels, such as suggestion boxes, internal online systems, employee meetings, and the Company's complaint channels.
- **Support for Freedom of Association** The Company supports employees' right to form associations in accordance with legal and human rights principles. It does not obstruct or interfere with any such associations and provides appropriate guidance within legal frameworks.
- **Right to Collective Bargaining** The Company respects employees' right to collective bargaining and has appointed employee representatives, including the Company Welfare Committee. The Company also conducts appropriate negotiation meetings as required by law.
- **Non-Discrimination** The Company is committed to fostering an equitable organizational culture, free from discrimination based on race, religion, gender, or personal status. All considerations are based on ability and suitability.
- **Promoting Diversity** The Company supports diversity in the workplace by providing opportunities for individuals of all genders, ages, nationalities, races, and backgrounds to collaborate and grow within the organization to their full potential.
- **Protection of Personal Data** The Company is committed to safeguarding the personal data of both employees and customers in strict compliance with the Personal Data Protection Act (PDPA), ensuring that access to such information is limited to authorized personnel only.
- **Working Hours** The Company strictly complies with regulations regarding working hours, overtime, and holidays. In addition, the Company controls and monitors these aspects to ensure alignment with labor and welfare standards.
- **Prevention of Child and Forced Labor** The Company strictly prohibits all forms of child labor and forced labor. A rigorous verification process is in place to review employee age and employment documents before commencement of work.
- **Minimum Wage Compliance** The Company provides compensation that surpasses the minimum wage required by law and regularly reviews wages to align with the cost of living and industry trends, ensuring fairness for all levels of workers.
- **Equal Compensation** The Company adheres to the principle of equitable compensation, based on overall corporate performance and individual employee contributions. No group is treated with bias, and wage disparity is regularly monitored and assessed.
- **Workplace Harassment Prevention** The Company strives to create a work environment free from harassment, intimidation, or violence. The Company explicitly states the anti-harassment policy and provides secure channels for reporting complaints.
- **Employment of Underprivileged Individuals** The Company supports inclusive employment by offering job opportunities to people with disabilities and other disadvantaged groups. Appropriate facilities and training are provided to support their integration.

Management of Non-Compliance

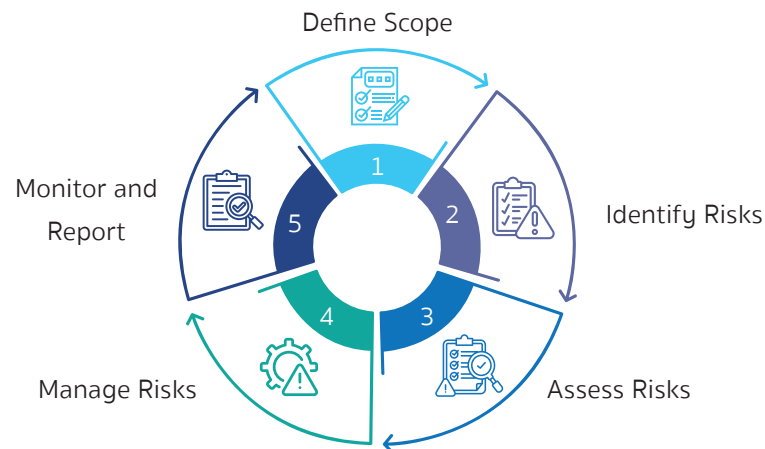
In the event that the Company identifies any practices that violate the Fair Labor Practice Guidelines or involve breaches of employees' fundamental rights, whether intentional or unintentional, the Company has established the following response framework as follows:

- **Fact-Finding with Fairness and Transparency:** The Company conducts investigations that protect the anonymity of complainants and adhere to robust good governance principles.

- **Corrective Opportunities:** In cases resulting from misunderstandings or inappropriate internal processes, the Company may offer corrective training or issue warnings, depending on the severity.
- **Disciplinary Measures:** For serious offenses or clear intentional breaches of guidelines, such as discrimination, harassment, or illegal labor practices, disciplinary action will be taken.
- **Remedy for Affected Parties:** The Company comprehensively assesses any damage incurred and provides appropriate assistance, which may include compensation, medical treatment, or reinstatement of violated rights.
- **Internal Process Review:** The Company continuously reviews and enhances internal control procedures to prevent the recurrence of such incidents.

4. Human Rights Risk Assessment

In 2024, the Company reviewed and updated its Human Rights Policy to appropriately address current needs and circumstances, reflecting its commitment to protecting and promoting human rights. This includes a comprehensive Human Rights Due Diligence (HRDD) process, as follows:



- **Defining Scope** The objective is to identify areas or activities with potential human rights risks. This can be categorized into three primary groups:
 - **Group Company Business Activities:** This encompasses areas where the Company operates, including its operational sites, headquarters, and industrial estate locations. Within these contexts, the Company has full authority and where potential impacts on employees and surrounding communities may arise.
 - **Supply Chain Business Activities:** These activities involve sourcing raw materials, transporting goods, and managing supplier relationships. While the Company may not have direct control over these areas, it's crucial to monitor and prevent potential human rights violations that could occur in production processes or among subcontractors.
 - **Investments in Related Businesses:** This refers to mergers, acquisitions, or the initiation of new business ventures with partners. Such activities may involve human rights risks, particularly in business or geographical contexts with labor limitations or concerns regarding fundamental human rights.
- **Risk Identification** The Company identifies human rights risks arising from activities within its value chain. It considers the overall human rights situation in the areas or locations of operation, as well as significant risks that could affect stakeholders, for example, employees, local communities, customers, and shareholders. Therefore, the Company encourages stakeholders to participate in identifying problems and human rights issues through feedback mechanisms, meetings, surveys, or various complaint channels. These enable the incorporation of diverse perspectives and contribute to a comprehensive and effective human rights risk management.
- **Risk Assessment** After identifying human rights risk issues, the Company assesses both the likelihood of the risk occurring and the severity of its impact if it materializes. This assessment is carried out using both qualitative and quantitative methods to prioritize issues and plan appropriate management

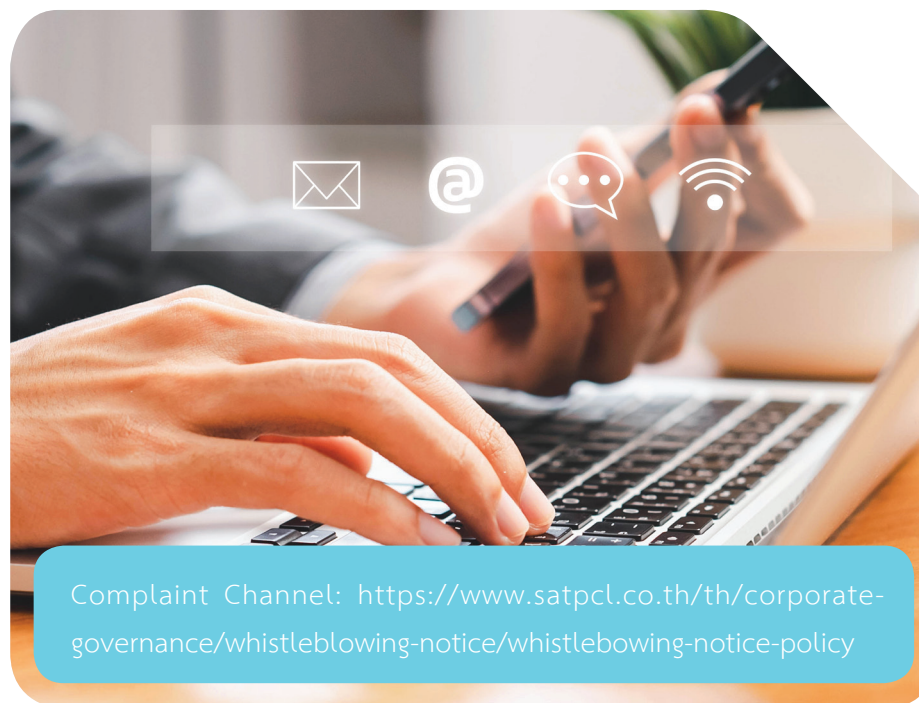
strategies. The Company utilizes risk assessment criteria developed based on its organizational risk management framework, considering key elements such as:

- Severity of Impact
- Number of People Affected
- Frequency or Likelihood of Occurrence
- **Human Rights Risk Management** is the process by which the Company analyzes and develops plans to prevent potential human rights issues and risks, including having response plans in place should problems arise. The Company promotes stakeholder engagement in managing human rights issues concretely. Meetings and consultation forums with relevant stakeholders are organized, such as employees, suppliers, and communities, to gather feedback, suggestions, and address human rights concerns. The insights gained from these engagements are then used to appropriately consider and refine human rights risk management plans, ensuring they align with stakeholder expectations, especially for high and very high-risk issues. The Company focuses on mitigating negative impacts while enhancing positive outcomes. Once measures are implemented, the Company continuously reviews its operational plans.
- **Monitoring and Reporting** The Company conducts human rights monitoring and reporting by collecting data related to impact assessments, implementation of measures, and performance results, as well as reviewing and updating action plans. The Company's monitoring and reporting adhere to principles of transparency and accountability, ensuring that reported information is accurate, complete, and reflects the true situation. The Human Rights Working Group reports these monitoring results to the Risk Management and Sustainability Development Committee, assuring stakeholders that their concerns will be considered and incorporated into the Company's assessment and decision-making processes.

5. Complaint Mechanism and Remediation for Human Rights Violations











The Company has established a systematic complaint and remediation mechanism to ensure that individuals and communities adversely affected by the Company's business operations are treated fairly and appropriately. The Company transparently and comprehensively discloses information about this mechanism, covering human rights, complaint procedures, confidentiality, and anonymity. This ensures stakeholders can easily and securely access and exercise their rights within the process.







Furthermore, the Company is committed to providing remediation to affected parties when investigations confirm that its actions or operations have directly or indirectly impacted human rights. Remediation will be determined on a case-by-case basis, considering appropriateness and fairness.



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

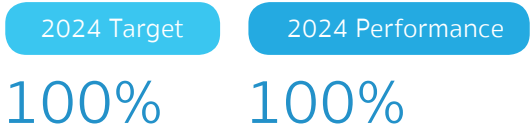
2024 Human Rights Risk Issues

Human Rights Risk Issue	Risk Level	Preventive Measures	Remedial Measures	Relevant Stakeholders
<p>Inadequate communication of Human Rights Policy across the supply chain.</p> 	<p>Medium</p> 	<ul style="list-style-type: none"> Consistently communicate the Human Rights Policy to suppliers. Require suppliers to conduct annual human rights self-assessments 	<ul style="list-style-type: none"> Provide safe and accessible complaint channels, investigate complaints and respond with appropriate measures. 	Suppliers, customers
<p>Suppliers failing to conduct human rights self-assessments in alignment with the Code of Conduct.</p> 	<p>Medium</p> 	<ul style="list-style-type: none"> Make self-assessment a mandatory requirement in procurement agreements. 	<ul style="list-style-type: none"> Suspend or review the status of non-compliant suppliers and recommend improvement strategies. 	Suppliers
<p>Discrimination in hiring and promotion.</p> 	<p>Medium</p> 	<ul style="list-style-type: none"> Implement fair employment policies. Establish clear promotion processes. 	<ul style="list-style-type: none"> Conduct investigations and provide appropriate remediation for any adverse impacts. 	Employees
<p>Unfair compensation for daily wages and temporary workers.</p> 	<p>Medium</p> 	<ul style="list-style-type: none"> Review compensation criteria to align with legal requirements and industry standards. 	<ul style="list-style-type: none"> Provide retroactive compensation if underpayment is identified. 	Employees
<p>Workplace accidents due to lack of protective equipment.</p> 	<p>Medium</p> 	<ul style="list-style-type: none"> Procure and distribute adequate Personal Protective Equipment (PPE). Regularly inspect equipment availability and readiness. 	<ul style="list-style-type: none"> Cover medical expenses. Report incidents and implement measures to prevent recurrence. 	Employees

Human Rights Risk Issue	Risk Level	Preventive Measures	Remedial Measures	Relevant Stakeholders
Use of minerals from conflict-affected and high-risk areas 	Low 	<ul style="list-style-type: none"> Establish a Conflict Minerals Policy. Verify the origin of minerals. 	<ul style="list-style-type: none"> Immediately instruct suppliers to change sourcing if a link to human rights violations is found. 	Suppliers
Impacts from pollution or waste potentially affecting surrounding communities 	Medium 	<ul style="list-style-type: none"> Regularly monitor waste and pollution discharge. Implement control measures in accordance with legal requirements. 	<ul style="list-style-type: none"> Provide clear and transparent information to the communities. 	Communities Government agencies and regulatory bodies.
Labor risks in new projects lacking internal controls (e.g., illegal labor, lack of contracts) 	Medium 	<ul style="list-style-type: none"> Establish labor contracting guidelines for new projects in compliance with labor laws. Verify labor documentation before project commencement. 	<ul style="list-style-type: none"> Conduct traceability investigations in case of irregularities. Compensate workers affected by rights violations. 	Employees Suppliers



Human rights risk assessment of Company operational sites.



Number of human rights violations within the organization.



Number of non-compliance cases with labor standards.

