



PTG ENERGY GROUP

Supporting Document

on

Human Rights Policy

Records of Revisions

11	13/08/2026	Full document revision
10	01/01/2026	Added Scope, Definitions, Roles and Responsibilities and Rights of Employees
09	01/01/2025	2024 Annual review
08	01/01/2024	2023 Annual review
07	23/12/2022	Specify more about participation in the negotiation of employee benefits.
06	11/11/2021	Added Rights of Partners and Corrective Measures
05	13/05/2021	Revised the entire document
04	01/01/2021	2020 Annual review
03	01/01/2020	2019 Annual review
02	01/01/2019	2018 Annual review
01	01/01/2018	2017 Annual review
00	23/12/2016	First implementation
No. of revision	Effective Date	Detail of Revision



Human Rights Policy

PTG Energy Public Company Limited ("the Company"), its subsidiaries, associates, and joint ventures ("the Group") are committed to conducting business responsibly, based on transparent, accountable, and ethical business practices, with respect for human rights and equal consideration for all stakeholder groups. To support compliance with human rights principles and contribute to the management of potential human rights impacts throughout the Company's value chain, the Group has established this Human Rights Policy. The Group is committed to adhering to and implementing the Human Rights Policy in its business operations in compliance with applicable labour laws and other relevant laws. In addition, the Group adopts relevant international and Thai frameworks and guidelines, as appropriate to its business context, including the United Nations Universal Declaration of Human Rights (UDHR) and the United Nations Guiding Principles on Business and Human Rights (UNGP).

Scope

This policy applies to all personnel of the Group, including subsidiaries over which the Company has management control. It covers organizational operations, products and services, as well as activities throughout the Company's value chain.

The Group expects associates and joint ventures over which the Company does not have direct management control, as well as partners, contractors, suppliers and service providers, business partners, and other relevant stakeholders, to uphold and comply with this Human Rights Policy. They are also expected to cooperate in preventing, mitigating, and managing potential human rights impacts arising from business operations, thereby promoting responsible business conduct, respect for human rights, and sustainable value creation for society and all stakeholders.

Definitions

Subsidiary	means	A limited company or public limited company over which the Company has control, or in which the Company holds more than fifty percent of the total voting rights.
Associate	means	A limited company or public limited company in which the Company, directly or indirectly, holds twenty percent but not more than fifty percent of the total voting rights.
Joint Venture	means	A limited company or public limited company that is jointly controlled by the Company and other parties under a joint arrangement, whereby decisions on significant activities require the consent of all parties sharing joint control.
Personnel	means	Employees at all levels working for the Company, including permanent and temporary employees involved in the Company's operations.
Vendors/Suppliers	means	A supplier, contractor and/or service provider of the Group, whether a juristic person or a natural person, including subcontractors of such supplier, contractor and/or service provider.
Business Partner	means	A person or organization having a business relationship with the Company through cooperation in areas such as raw material procurement, production, distribution, commercial cooperation, or other business relationships that support the Company's operations.
Human rights	means	The inherent dignity, rights, and fundamental freedoms of all human beings, as well as equality and freedom from discrimination on the grounds of race, nationality, religion, gender, age, skin color, language, ethnicity, indigenous status, or any other status.



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Vulnerable Group means

Individuals or groups at a higher risk of human rights violations or who may not have equal access to fundamental rights due to factors such as social, economic, or health status. Vulnerable groups include older persons, children and youth, women, pregnant women, persons with disabilities, minorities, migrant workers, third-party contracted workers, and LGBTQI+ persons, among others.

Roles and Responsibilities

The Board of Directors

Oversee and establish policies and guidelines to prevent human rights violations across all business activities of the Group throughout the Business Value Chain, and promote the effective implementation of human rights practices.

Management

1. Establish operating regulations appropriate to the context of each company, ensuring alignment with this policy, related regulations, requirements, and the laws of the countries where the business operates.
2. Oversee compliance with policies, guidelines, and regulations, and identify improvement opportunities to enhance implementation effectiveness. Ensure that performance under such policies, guidelines, and regulations is properly monitored and reported.

Department or Persons Responsible for Human Rights

1. Communicate concepts and objectives, and build knowledge and understanding of human rights and labor practices among the Group's employees and all stakeholders throughout the supply chain.
2. Establish a Human Rights Due Diligence (HRDD) Process, with the following responsibilities:
 - 2.1 Identify and review relevant stakeholder groups and those who may be affected by business operations, and conduct ongoing stakeholder engagement and consultation to reflect stakeholders' views, expectations, and concerns as inputs to the Human Rights Due Diligence process.
 - 2.2 Identify human rights risk issues covering forced labor, human trafficking, child labor, freedom of association, the right to collective bargaining, equal remuneration, discrimination, and harassment (including sexual harassment and other forms). Conduct Human Rights Impact Assessments (HRIA) and labor practice evaluations covering stakeholders at risk of human rights violations, such as employees, local communities, partners, suppliers, contractors, customers/consumers, and vulnerable groups and relevant vulnerable groups including women, children, indigenous peoples, migrant workers, third-party contracted workers, LGBTQI+ persons, persons with disabilities, pregnant women, and the elderly, while listening to issues from relevant stakeholders.
 - 2.3 Establish appropriate remediation measures and action plans to mitigate impacts, including preventive measures and corrective actions to reduce risks both within and outside the organization.
 - 2.4 Monitor and track the effectiveness of preventive measures and corrective actions.
 - 2.5 Communicate the results of the Human Rights Impact Assessment, remediation measures, impact management approaches, and performance outcomes to affected stakeholders and the public.
 - 2.6 Gather feedback from all sectors, including affected groups, human rights experts, and civil society organizations.
 - 2.7 Provide whistleblowing and grievance mechanisms, as well as remediation channels, for individuals affected by human rights and labor practice issues.
3. Collect and maintain reports on Human Rights Impact Assessments and labor practices.
4. Report human rights and labor practice performance to the Corporate Governance and Sustainability



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Committee at least once a year.

Employees

Employees at all levels of the Group are responsible for adhering to and strictly complying with this Human Rights Policy, as well as applicable laws, regulations, and guidelines relevant to their work. Employees shall also report or raise concerns when they become aware of any conduct that may violate this Policy. When expressing personal opinions, employees must protect the Company's image and reputation and must not use the Company's name, information, assets, or take any action that could be understood as expressing an opinion or acting on behalf of the Company.

Guidelines

The Group manages human rights issues concerning employees, partners, customers, and communities by conducting Human Rights Due Diligence (HRDD) within an appropriate timeframe, together with appropriate risk management measures and reasonable remediation measures. Human rights management covers the rights of the Group's employees, rights of partners, rights of customers, and rights of communities and the environment, as detailed below:

Rights of Employees

1. Ensure respectful and dignified treatment throughout the employment process, starting from recruitment, compensation, working hours and holidays, work assignment, work evaluation, training and development, progress planning and other matters without engaging in any discrimination practice.
2. Be cautious in performing one's own responsibilities to avoid potential risks of human rights violations that may be caused by business operation, as well as ensuring respect for human rights and reporting any suspected activity to the line manager to prevent human rights violations.
3. Ensure that there is no forced labour or labour resulting from human trafficking, and no corporal punishment involving physical or mental abuse, whether in the form of intimidation, detention, coercion, threats, harassment, abuse, or violence of any kind. Moreover, the rights of vulnerable groups, e.g., persons with disabilities, must be recognised and respected.
4. Child labor in all forms is strictly prohibited. The minimum age for employment shall fully comply with applicable laws and regulations. Commitment is maintained to prevent child labor throughout the supply chain in any manner and to promote and support children's rights in accordance with the Children's Rights and Business Principles (CRBP) through responsible business conduct.
5. Employees have the right to freedom of association and the right to collective bargaining. Participation is supported through the Welfare Committee in the workplace under Section 96 of the Labour Protection Act B.E. 2541, which represents employees in providing opinions and proposing appropriate welfare management guidelines to the employer. Meetings of employee representatives are held on a quarterly basis.
6. Monitor health, the environment and work safety with safety handbooks in place to enhance employee's quality of life and ensure that they will never overlook or omit any incident that can possibly cause accidents, injuries and illnesses to workers.



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Rights of Suppliers

1. Manage risks arising from the Group's partners, including identifying and assessing partner-related risks with consideration for social, environmental, and corporate governance factors. The Group also discloses relevant information on partner risk management to enhance stakeholder confidence and transparency in its operations. In the event of a human rights violation, the Group expects partners to have appropriate corrective processes and measures in place to mitigate the impacts arising from such violation.

2. Encourage suppliers to comply with the Supplier Code of Conduct whereby all suppliers operate their business fairly and maintain accountable financial status and business records, as well as facilitating access to their premises for necessary assessment. Furthermore, it is preferable that the suppliers shall observe and comply with the Group's human rights policy, and deliver their business with integrity and with no human rights violations detected while also being aware of their own responsibilities towards the society, community and the environment.

3. Encourage suppliers' employees to participate in training on contractor safety and to strictly follow work guidelines and work safety handbooks.

Rights of Customers

1. Respect privacy rights of customers by maintaining customers' personal data confidential. No one shall seek benefits from those data, neither for personal gains nor for advantages of relevant parties, whether such information is provided for the purposes of marketing, order placement, or customer services. All data will be kept confidential and accessible only by authorised users. In this regard, any disclosure or transfer of such data to a third party must not breach legitimate rights and explicit consent of data subject is required.

2. Deliver products of quality and completely disclose up-to-date product/service information and updates without distortion of factual information. Also, the Group shall fulfill all contracts, agreements and conditions executed with the customers in a transparent and fair manner.

Rights of Community and the Environment

1. Preserve the environment throughout its business journey to prevent potential impacts caused by business activities. Moreover, the Group has instilled awareness of such matter in employees and relevant parties to encourage their compliance with mandatory practices, e.g., those contained in legal provisions, standards, regulations and guidelines. Furthermore, the Group promotes and supports well-planned environmental management for stakeholders, disclosure of actions taken on the environment in a transparent manner through different platforms as deemed appropriate.

2. Respect the rights, ways of life, and traditions of communities, particularly those surrounding the Group's establishments. The Group also promotes participation in community and social development by providing assistance appropriate to the needs of each society and community, particularly communities surrounding the Company's operations, and by improving community livelihoods and quality of life so that communities and society can thrive alongside the Company.

Receiving Complaints, Protection of Complainants/Informants and Remedies

PTG Energy Group encourages its employees and stakeholders to reflect their opinions, problems, and report any activity suspected to involve wrongdoing, or lodge a complaint where there is an incident or action associated with human rights concerns or non-compliance with the Code of Conduct through different mechanisms, i.e., whistleblower@ptg.co.th, PTG Call Centre and Mobile Application. Every complaint will be handled appropriately and fairly while each informant will be protected, to the greatest extent, with effective protection measures in place to



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ensure their safety after reporting the incident related to human rights. Importantly, the Group also has several corrective measures ready to lessen any potential impact where a human rights violation has occurred and it has been legally established that the Group was responsible for such violation. These measures include medical support, damage compensation and care provision for those affected by such abuses to make sure they receive a proper remedy for the harm they have endured.

The Group shall review this Human Rights Policy and monitor its implementation at least once a year, or whenever there are significant changes in business operations, applicable laws, or relevant standards, to ensure that the Policy remains appropriate and aligned with the Group's business context.