

CENTRALPATTANA

110081 0085/2021 Human Rights Policy

April 9, 2021

Central Pattana Public Company Limited (“The Company”) recognizes that all human beings are valued and equal in dignity and rights. The Company, therefore, respects human rights and implant the respect amongst related parties throughout the Company’s value chain. This is to ensure compliance with the laws, rules, regulations, and good corporate governance. Also, this creates confidence that the Company operates responsibly and without human rights violation. It includes equal treatment to employees and related stakeholders concerning human rights, covering protection, respect, and remedy suitably for possible human rights abuse.

Our Human Rights Policy upholds and respects human rights as reflected in The United Nations Universal Declaration of Human Rights (UNDHR), The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and The United Nations Guiding Principles on Business and Human Rights (UNGPs).

1. Scope

This Policy applies to the operations directly linked to the Company as well as those of our affiliated companies and our joint ventures under the Company’s management. The Company also encourages our business partners and entities in our value chain, including but not limited to, business partners, tenants and customers, prime contractors, sub-contractors, joint ventures, to follow the Policy.

2. Definition

Human rights refer to human dignity, basic innate rights and freedom and equality without distinction of any kind such as race, religion, color, language, national or social origin or other status (Source: Office of the National Human Rights Commission of Thailand).

Forced labor refers to work that is performed involuntarily and under the menace of any penalty and situations in which persons are coerced to work through the use of violence and intimidation which result in involuntary work and work under duress (Source: Office of the National Human Rights Commission of Thailand).

Child labor refers to work that deprives children of their childhood, their potential and their dignity; work that is harmful to physical and mental development; work that is mentally, physically, socially or morally harmful to children; work that interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school permanently, or requiring them to attempt to combine school attendance with excessively long and heavy work (Source: Department of Labour Protection and Welfare).

Vulnerable groups refer to groups of people who have less resources or less power to deal with problems caused by social inequality which may be caused by disparities in physical and social status, incarceration or restricted freedom, poverty, and structural injustice (Source: Union for Civil Liberty).

According to the Company's Human Rights Policy, vulnerable groups cover children, pregnant women, the disabled, the elderly, immigrant workers, contract workers, and local communities, for instance.

Value chain refers to a set of interlinked activities that create added value to the Company, throughout its business processes in which each stage is intertwined and adds value before the products or service being delivered to its customers.

Stakeholders refer to an individual or group that can affect or is affected by the Company's operations in terms of positive or negative and direct or indirect operations, for instance, our employees, customers, business partners and alliance, the society, community, and environment.

3. Human Rights Policy

All human beings are born free and equal. Human Rights Policy is applicable to all activities of the Company. The Board of Directors, executives, and all employees are committed to respecting and promoting human rights by the following practices:

- 3.1 Treat everyone equally on a basis of human dignity according to human rights principles without discrimination of any kind based on race, nationality, gender, age, color, religion, opinion, physical conditions, social or family status, or any other distinctions.
- 3.2 Ensure that all of our business activities do not violate human rights of any related parties neither directly nor indirectly.
- 3.3 Contribute to the promotion and respect of human rights to prevent violation that might be caused by the Company's business activities.
- 3.4 Support our business partners and entities in our value chain to develop understanding about this Human rights Policy.
- 3.5 Track and monitor the human rights risk and impact assessment regularly and formulate suitable risk management guidelines or measures.
- 3.6 Establish effective procedures for complaint handling and data retaining as well as consistently develop the whistleblowing channel for human rights violation.
- 3.7 Disclose data about the progress on our activities regarding human rights on our annual report (56-1 One Report) and on our website or other appropriate channels.

This Human Rights Policy covers the rights of our significant stakeholders, namely, 1) employees, including both permanent and temporary ones, 2) customers, including both tenants and shoppers, 3) business partners and alliance, and 4) the society, community, and environment. The guidelines on the treatment of each stakeholder group are as follows:

- 1) **Rights of employees:** providing suitable working conditions without discrimination, supporting the respect of diversity in the organization, providing opportunities for employment of physically challenged people, providing occupational health and safety, providing a workplace free from intimidation, listening to employees' voice to as well as consistently improving employment conditions and working environment.
- 2) **Rights of tenants and service users:** paying attention to health and safety of customers; doing business activities responsibly, impartially, and without intimidation in any form; respecting the privacy rights of customers by providing a secure and standard system of retaining customers' personal data.
- 3) **Rights of business partners and alliance:** promoting suitable and fair employment according to the laws and international labor standards, offering fair pay and hours of work without discrimination, paying attention to health and safety of workers, working against illegal employment and intimidation in any form.
- 4) **Rights of the society, community, and environment:** operating business with responsibility and respect for the society, community and environment; raising the standard of living, health, and safety in the community; being responsible for the environment conservation and energy saving by minimizing negative impacts of business activities on the society, community, and environment.

4. Practices on human rights for labor

To minimize the risk of possible human rights violation, the Company sets out the guidelines of practices on human rights to meet international standards which cover fundamental rights and labor rights that are in line with the Company's context. In addition, the Company monitors the practices throughout value chain to ensure that they accord with the guidelines as follows:

4.1 Forced Labor

- 4.1.1 Not engage in any form of forced labor.
- 4.1.2 Not engage in imprisonment or debt bondage of labor or any financial penalty such as non-payment, withholding or late payment of wages.
- 4.1.3 Not request for or accept money or pledge, or retain identification documents from employees in exchange with employment unless the actions are not against the laws.

- 4.1.4 Not engage in coercion, intimidation, or any form of violence through physical, verbal or mental abuse.
- 4.1.5 Not limit mobility rights or engage in isolation e.g. banning employees from travelling outside of the workplace or residential area, isolating them from the community and society.
- 4.1.6 Not engage in any form of human trafficking labor.
- 4.1.7 Not deprive of rights and privileges or refuse to provide basic human needs.

4.2 Child labor

- 4.2.1 Not engage in or support the hiring of child labor under the age specified by the laws.
- 4.2.2 Not engage in or support working in unsafe conditions or environment hazardous to child labor's health, safety, or development.
- 4.2.3 Not engage in or support child labor without the parents' consent.
- 4.2.4 Not engage in or support child labor that interferes with their compulsory education.

4.3 Women labor

- 4.3.1 Not assign female employees to do hazardous work harmful to health or physical conditions as specified by law.
- 4.3.2 Provide equitable pay for male and female employees for work in equal job grade or position.
- 4.3.3 Provide safe working environment for pregnant employees so that it is not harmful to their occupational health.
- 4.3.4 Provide facilities necessary for pregnant or breastfeeding employees at work.
- 4.3.5 Not dismiss, demote, or reduce benefits and welfare of pregnant employees due to their pregnancy.

4.4 Migrant workers

- 4.4.1 Hire and support the hiring of migrant workers who possess legal work permits.
- 4.4.2 Provide clear employment contracts written in the language the migrant worker understands.
- 4.4.3 Provide fair wages and proof of every payment.

4.5 Occupational health, safety, and environment

- 4.5.1 Provide safe workplace appropriate for the nature of work of each person and complying with laws or associated regulations in order to minimize risks of accidents, injuries, or any factor affecting physical or mental health of employees.

4.5.2 Provide sufficient safety equipment and training to raise employees' awareness of safe workplace and act accordingly.

4.6 Equality and non-discrimination

4.6.1 Recruit employees based on job requirements and qualifications and not discriminate against any job applicant due to any other distinctions.

4.6.2 Commit to non-discrimination in hiring, compensation, welfare provision, promotion, and transfer, while not discriminate or promote discrimination against any other distinctions.

4.6.3 Commit to non-discrimination in employees' benefits, training, and career progression, taking into account the suitability for each job position.

4.6.4 Set and disclose performance appraisal results to employees in a transparent and fair manner in order to enable them to improve their performance.

4.6.5 Not infringe on or impede employees' rights to be exercised due to any other distinctions.

4.6.6 Not engage in termination and retirement due to any other distinctions.

4.7 Prevention of violence, menace, and harassment

4.7.1 Prohibit violence, menace, and harassment of any kind.

4.7.2 Prohibit power harassment or sexual harassment that might cause.

- trouble, intimidation, humiliation, or disdain.
- unsafe, threatening, hostile, or offensive environment.
- unreasonable interferences.
- effects on hiring, recruitment, appointment, transfers, or compensation.

4.8 Compensation

4.8.1 Provide employees' wages, overtime pay, and benefits in compliance with legal requirements.

4.8.2 Provide written and clear proof of payment to notify employees about the amount of payment, compensation, indemnity and benefits in compliance with legal requirements.

4.8.3 Provide employees' access to social security and other benefits in compliance with legal requirements.

4.8.4 Provide voluntary provident fund consisting of both the Company's and employees' contributions to make financial savings for retirement, resignation, disability and assurance for their family in case of untimely death.

4.9 Working hours

- 4.9.1 Offer clear start and finish times and appropriate hours of work and overtime in compliance with the laws.
- 4.9.2 Provide time and attendance system.
- 4.9.3 Provide reasonable breaks and rest periods.
- 4.9.4 Provide leaves, including vacation, business and other leaves, as well as provide annual public holidays in compliance with the laws.

4.10 Freedom of Association and Collective Bargaining

- 4.10.1 Respect the right to freedom of opinion and expression, and the right to file a complaint through channels provided by the Company.
- 4.10.2 Respect the employees' decision whether to join a union or club, in which peaceful, weapon-free assembly can be performed as long as it does not affect effectiveness at work and continuity in service providing.
- 4.10.3 Not infringe on the right to assembly, except if the said infringements are done to protect public interests, to maintain peace and order, or to prevent any violation of the laws or the Code of Conduct.

4.11 Dismissal and indemnity payments

- 4.11.1 Not dismiss employees from their job in an unfair manner.
- 4.11.2 Notify a dismissal to employees in advance of the dismissal and offer compensation in compliance with laws.

5. Human Rights Risk and Impact Assessment

5.1 Human Rights Impact Assessment (HRIA)

The Company is committed to human rights impact assessment on stakeholders and vulnerable groups relevant to the Company with constant tracking of human rights assessment.

5.2 Human Rights Due Diligence (HRDD)

The Company provides a procedure of human rights due diligence that identify risks and impacts caused by business activities and related stakeholders throughout value chain. With an aim to protect and alleviate the impacts on human rights, which are caused or may be caused by the Company's activities, the Company shall appropriately and adequately promote awareness, protection, respect, and remedy of human rights relevant to internal and external stakeholders.

6. Handling compliants

- 6.1 Provide complaint and whistleblowing channels for human rights violation reports through the Company's website and other channels specified by the Company such as <https://www.centralpattana.co.th/en/whistle-blowing>.

- 6.2 Provide a procedure to verify information or complaints about human rights violation after receiving complaints from employees and/or stakeholders, as well as report the complaints to the executives for appropriate solution or alleviation of the impacts on human rights.
- 6.3 Conduct fair investigation and examination as well as protect the rights of employees and the Company's workers with fairness in compliance with the Code of Conduct.

7. Remedies for impacts

- 7.1 Conduct Human Rights Impact Assessment and/or Human Rights Due Diligence (HRDD) in order to investigate the level of impacts on human rights that employees, business partners, customers, and community possibly get due to the Company's business activities, as well as to provide effective prevention, alleviation and remedies to affected parties.
- 7.2 Provide remedies taking into consideration the risk and impact level to the highly affected group as top priority which includes those affected by the activities unmanageable if not tackled immediately, followed by other affected groups.

8. Monitoring

- 8.1 Regularly monitor, review, and assess risks and impacts on human rights, formulate an appropriate measure of risk management while each department is responsible for managing risks under their own responsibility, as well as encourage business partners and alliance to assess their operation results which includes labor and human rights issues.
- 8.2 Assign related departments to monitor cases of human rights violation and to do a relevant report in order to solve the problem.
- 8.3 Assign related departments to report human rights violation to the Audit and Corporate Governance Committee and the Board of Directors, respectively.

9. Public disclosure

Disclosure of the Company's human rights performance is part of sustainability development reporting. The report is made available through the annual report (56-1 One Report) and the Company's website or other appropriate channels.

10. Recognition and significance

The Company encourages the executives, employees, business partners, and alliance to be aware of their fundamental human rights in such a way that they and their related parties shall be treated as well as jointly prevent human rights violation. In addition, the

- Translation -

Company provides human rights education via E-learning portal in order to create understanding on human rights at work.

This Human Rights Policy is effective from April 9, 2021 onwards according to the resolution of the Board of Directors' Meeting No. 3/2021.

- *Signature* -

Mr. Preecha Ekkunagul

President & CEO

Central Pattana Public Company Limited