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(Translation)

Guidelines
Human Rights Due Diligence: HRDD
IA₃-ADB-09

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Document approval page

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Document history page

No.	Revision No.	Page	Description	Purpose of document preparation	For the controller	
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Human Rights Due Diligence: HRDD

1. Principles and objectives

Applied DB Public Company Limited and its subsidiaries, which are collectively referred to in the documents as the “Company”, have established a comprehensive human rights due diligence process (Human Rights Due Diligence: HRDD). to identify, prevent and mitigate any human rights impacts arising or potentially arising from business operations under the UN Guiding Principles on Business and Human Rights (UNGP) referring to the human rights due diligence process, which consists of 5 steps as follows:


- 1) A statement of Policy commitment to Respect Human Rights
- 2) Assessment of Actual and Potential Human Rights Impacts of Company Activities and Relationship
- 3) Incorporating into Company Procedures and Addressing impacts
- 4) Tracking and Reporting Performance
- 5) Remediation and Remedy

2. Scope of the comprehensive human rights audit operations

- 1) Scope within the company's own area of operation
- 2) Key contractors and Tier 1 partners
- 3) Audits during the merger or acquisition process

3. Duties and responsibilities

- 1) Directors
- 2) Subcommittees
- 3) Responsible division
 1. Evaluation of the effectiveness of mitigation measures by identifying and assessing environmental issues
 2. Assessment of safety and occupational health hazards and risks according to ISO standards in all operating areas
 3. Assessment of risks and internal control of all units in the organization
 4. Apply the UNGPs human rights risk assessment guidelines to assess risks that may remain from the assessment and management according to the above process to be as complete and comprehensive as possible in all dimensions throughout the value chain. This will be done every 2 years or when there is an event that affects the change of risk/impact, covering the identification of human rights issues/impacts on all stakeholders.
 5. The above risk assessment must be managed by setting measures and management plans as appropriate
 6. Report progress to executives in each department that is overseen periodically

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4. General chapter

The human rights due diligence process consists of five steps as follows:

1) A statement of Policy commitment to Respect Human Rights

The Company is committed to respecting the human rights of all stakeholders by adhering to international human rights and labor standards, including the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, which cover the prohibition of forced labor, child labor, non-discrimination, and harassment or sexual harassment in all forms, freedom of association, the right to collective bargaining, equal pay, and other human rights.

The Company has announced a human rights policy that comprehensively respects international human rights principles and labor standards. The scope of the human rights policy includes the Company's expectations for compliance with human rights not only in the Company's operations but also in its subsidiaries and business partners.

For more information on the Human Rights Policy, please visit the Company's website <https://www.adb.co.th>

In addition, the Company has requested its business partners to complete a questionnaire on the sustainability of its partners, covering economic, social, and environmental aspects, including human rights, to raise awareness among business partners about the importance of human rights.

2) **Assessment of Actual and Potential Human Rights Impacts of Company Activities and Relationship**

The Company has conducted a human rights risk assessment to identify actual and potential risks from involvement or linkage through business relationships by considering both internal and external stakeholder groups that may be directly or indirectly impacted by the Company's business activities throughout the supply chain. In addition, the Company also considers vulnerable groups such as forced labor, women, children, migrant workers, and local communities that may be involved in business activities in the human rights risk assessment process, including risks related to pay equity and discrimination.


The human rights risk assessment covers all of the Company's business activities, divided into 2 main groups:

1) **Core business activities, including:**

- 1.1) Production Operations
- 1.2) Procurement Operations
- 1.3) Service and Delivery Operations
- 1.4) Research and Product Development Operations

2) **Supporting Business Activities**

- 2.1) Partners

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2.2) Employees

2.3) Customers

2.4) Society and Community

This includes potential new business processes such as Joint Ventures or Mergers and Acquisitions.

3) Incorporating into Company Procedures and Addressing impacts

Step 1: Human Rights Identification


Identifying human rights issues related to the Company's business activities can be done by comparing the Company to similar businesses in the same industry. The scope of the Company's related human rights is as follows:

1. Labor rights

- 1) Work environment is the creation of a physical environment that creates safety at work, such as work rooms, noise, lighting, work atmosphere, working hours, and other environmental characteristics such as equipment and tools that help promote efficient work of employees.
- 2) Occupational health and safety of employees and contractors in the operating area means the implementation of occupational health and safety of employees and contractors in the company and the operating location and a plan to provide assistance, create awareness and access to occupational health and safety operations covering all employees and contractors
- 3) Non-discrimination means treating all employees equally, including receiving equal and equal wages, without using criteria such as race, skin color, gender, religion, region, educational institution, political opinion or others to discriminate.
- 4) Freedom of association and participation in bargaining: Employees have the right to negotiate fair work benefits and have freedom of association.
- 5) Labor rights and legal compliance: The company will not use forced labor or child labor, including compliance with the specified labor laws.

2. Customer rights

- 1) Maintaining confidentiality and personal information of customers means not violating customers' personal information and having management guidelines to protect the privacy of information.
- 2) Non-discrimination against customers means having management guidelines and preventive measures against non-discrimination against customers.

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3. Partner rights

- 1) Business Partner Code of Conduct: The Company's operations must be in accordance with good ethics, fair and transparent business practices, based on the principle of receiving fair returns for both parties.
- 2) Maintaining the confidentiality of partners: The Company will not violate the confidential information of partners, such as copyright information, patents, etc.

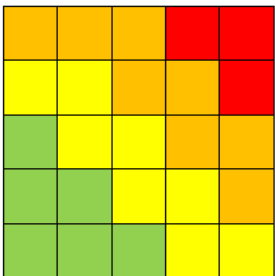
4. Community and environmental rights

- 1) Standard of living and quality of life: The Company's operations will not cause negative impacts on the surrounding communities in terms of human rights, such as reducing the income of people in the community from unfair competition
- 2) Community occupational health and safety is the company's operations to be careful of operations that cause negative impacts on community occupational health and safety, such as accidents resulting from the company's operations, creating various types of pollution in the community.
- 3) Waste and hazardous material management is the company's waste and hazardous material management operations, which are carried out or disposed of in a proper manner and do not affect the environment and nearby communities, such as wastewater treatment or chemical management, etc.
 - The impact of environmental pollution is to monitor the environmental index and maintain equipment, trap and release waste to be in a usable condition efficiently.


Step 2: Risk Ranking

The Company conducts human rights risk assessment using the Likelihood and Impact Level criteria to prioritize human rights risks.

ตารางประเมินความเสี่ยงด้านสิทธิมนุษยชน		เกณฑ์ระดับผลกระทบและความเป็นไปได้
ระดับผลกระทบ	ระดับความเป็นไปได้	



1. สูงมาก
2. สูง
3. ปานกลาง
4. ต่ำ

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Risk Measurement Level: Impact

Human rights impacts are assessed based on a variety of factors, including geographic, social and economic factors, as well as the scale, scope and limitations of the ability to reverse adverse impacts.

Level of impact	Nature of effect
Critical	<ul style="list-style-type: none"> Human rights impact covers a wide scope of area or population, extending beyond the area of operations The company cannot control or mitigate human rights impacts to remediate the affected victims and return them their deserved rights The impact/ incident related to human rights requires the support of an independent, trusted third party to mediate the issue.
major	<ul style="list-style-type: none"> The company is complicit in assisting or supporting an activity that resulted in human rights violation (legal complicity). he human rights impact is caused by the activities of the company or the activities in the company's supply chain and created impacts on stakeholders in the scope of operations. The company has human rights conflict with vulnerable groups.
moderate	<ul style="list-style-type: none"> The company benefited from activities conducted by external parties that resulted in human rights violation (non-legal complicity). The company cannot respond to the human rights concerns of internal or external stakeholders.
minor	<ul style="list-style-type: none"> Potential human rights impacts and concerns raised by internal or external stakeholders are prevented and resolved through the company's effective grievance mechanisms.

Risk measurement level: Likelihood


Level of impacts	Impact likelihood
Likely (>25%)	Incident that can occur within the area of operations several times per year (>25%)
Possible (10-25%)	Incident that can occur within the area of operations occasionally (10-25%)
Unlikely (1-10%)	Incident that rarely occurs within the area of operations, but there is possibility to happen. (1-10%)
Rare (<1%)	Incident that has occurred with industry peers but there is little possibility to happen with the company (<1%)

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For detailed working procedures, please refer to the Enterprise Risk Management Practice Guidelines (IA3-ADB-05).

Step 3 Risk Management

Key human rights risks	Corrective and preventive actions	Monitoring and follow-up
Labor rights, legal compliance	<ul style="list-style-type: none"> ● New laws are monitored and implemented within the company. 	<ul style="list-style-type: none"> ● The company has complied with the law and has no lawsuits.
Health and safety of employees and contractors in the operating area	<ul style="list-style-type: none"> ● Communicate knowledge, create awareness and culture of safety ● Campaign and investigate compliance and violations of safety rules. ● Assess the risk of contractors before entering the area from the safety department. 	<ul style="list-style-type: none"> ● There were no serious accidents resulting in deaths among company employees and contractors.
Environmental health and safety of communities and society	<ul style="list-style-type: none"> ● Be careful and prevent the impact of your business that may affect your community ● Survey and listen to community feedback 	<ul style="list-style-type: none"> ● There are no incidents or reports in which the community has been damaged or harmed by the Company's operations.
Impact of environmental pollution	<ul style="list-style-type: none"> ● Monitor environmental indicators and maintain waste containment and discharge equipment to ensure they are in efficient working condition. ● Communicate and educate employees to be mindful of their work to preserve the environment, which benefits themselves, the organization, society, and the environment. 	<ul style="list-style-type: none"> ● Air and water quality test results pass the criteria set by law. ● No complaints of wrongdoing and environmental impacts

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4. Tracking and Reporting Performance)

The Company conducts monitoring and follow-up of human rights performance and continuously communicates and educates employees on human rights in order to prevent problems that pose risks of negative impacts through the Company's activities and business relationships

The Company discloses information on its human rights performance to the public annually through its annual report or website.

Contact channels

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5. Remediation and Remedy

The Company recognizes that its business activities may support or be linked to human rights violations of its stakeholders. Therefore, the Company strives to mitigate and prevent such risks and violations to fulfill its commitments. The Company will conduct human rights risk assessments to identify situations and human rights violations in its business activities. The Company will also establish mitigation measures with the objective of remedying and mitigating the likelihood of human rights violations that may arise from its business activities.

In the event of a human rights violation, the Company will conduct a fair investigation process and take disciplinary actions in accordance with the Company's regulations and rules as follows:

- 1) Verbal or written warning
- 2) Suspension
- 3) Deduction or suspension of annual bonuses
- 4) No Salary Adjustment
- 5) Dismissal or termination

This guideline has been reviewed and approved by the Board of Directors' Meeting No. 7/2023 on November 30, 2023 and the CEO has signed it to announce the guidelines after the date of signature.