

## Human Rights Due Diligence: HRDD

The company has conducted a human rights due diligence as part of an ongoing risk management process. The objective is to identify, prevent, mitigate, and review how the company addresses human rights impacts arising from its business activities. This is based on a human rights due diligence process that includes five steps in accordance with the UN Guiding Principles on Business and Human Rights (UNGP).

## Comprehensive Human Rights Due Diligence Process

- 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

#### 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 human rights principles and international labor standards, including the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. This commitment covers anti-human trafficking, forced labor, child labor, non-discrimination, the prevention of harassment or sexual abuse in all forms, freedom of association, the right to collective bargaining, equal compensation, and other human rights issues.

The company has announced a comprehensive Human Rights Policy, which respects human rights principles and international labor standards. The scope of this policy includes the company's expectations regarding human rights practices, not only within the company's operations but also extending to its subsidiaries and business partners.

Details of the Human Rights Policy can be found on the company's website:

https://www.etcenvi.com/

Additionally, the company has required its business partners to complete a supplier sustainability questionnaire, covering economic, social, and environmental issues. This questionnaire includes human rights topics, aimed at raising awareness among business partners about the importance of human rights issues.

# 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 both actual and potential risks arising from its involvement or connections through business relationships. This assessment takes into account both internal and external stakeholders who may be directly or indirectly affected by the company's business activities throughout the supply chain.

Furthermore, the company is mindful of vulnerable groups, such as forced labor, women, children, indigenous peoples, migrant workers, third-party contract workers, and local

communities that may be involved in the company's business activities. The human rights risk assessment covers issues such as equal pay and non-discrimination.

The human rights risk assessment encompasses 100% of the company's business activities and is divided into two main groups:

#### Core business activities:

- Product operations
- Service operations
- Distribution operations
- Branch operations

## Support for business activities:

- Business partners
- · Employees
- Customers
- Society and communities
- Shareholders

This also includes potential new business processes, such as joint ventures or mergers and acquisitions.

#### Labor Rights

- Work Environment: Creating a physical environment that ensures safety in the workplace, such as office spaces, noise levels, lighting, work atmosphere, working hours, and other environmental factors, including equipment and tools that promote employees' efficiency.
- Occupational Health and Safety: Managing occupational health and safety for employees within the company, at operational locations, and implementing plans to raise awareness and ensure all employees have access to occupational health and safety measures.
- Non-discrimination: Treating all employees equally, ensuring fair and equal pay, without discrimination based on ethnicity, skin color, gender, religion, region, educational background, political opinions, or any other factors.
- Freedom of Association and Collective Bargaining: Employees have the right to engage in fair negotiations regarding work-related benefits and have the freedom to associate.
- Child Labor and Forced Labor: The company will not engage in forced labor, child labor, or human trafficking.

#### Community and Environmental Rights

- Standard of Living and Quality of Life: The company's operations will not negatively impact nearby communities in terms of human rights, such as reducing the income of community members through unfair competition.
- Community Occupational Health and Safety: The company will carefully manage its operations to avoid negative impacts on the community's occupational health and safety, such as accidents caused by the company's activities or pollution affecting the community.
- Access to Clean Water: The company's operations must not obstruct the community's access to clean water, such as blocking water sources or depleting water from community resources to the point of causing drought.

- Waste and Hazardous Materials Management: The company will manage waste and
  hazardous materials appropriately, ensuring proper disposal and preventing harm to
  the environment and nearby communities, such as through wastewater treatment or
  chemical management.
- Land Acquisition: The company will assess the impact on human rights before proceeding with land acquisition to ensure no adverse effects occur.

### <u>Customer Rights</u>

- Customer Health and Safety: The company ensures that its selected products and services meet quality standards, are fairly priced, and consider the health and safety of customers during their use.
- **Protection of Customer Privacy:** The company respects customers' personal data and implements management guidelines to protect their privacy.
- Non-discrimination Against Customers: The company has management guidelines in place to prevent discrimination against customers.

#### Supplier Rights

- Supplier Code of Conduct: The company's operations must adhere to good ethical standards, ensuring fair and transparent business practices, based on mutually fair compensation for both parties.
- Protection of Supplier Confidentiality: The company will not violate the confidentiality of its suppliers, including information related to copyrights, patents, and other proprietary data.
- 3. Incorporating into Company Procedures and Addressing Impacts

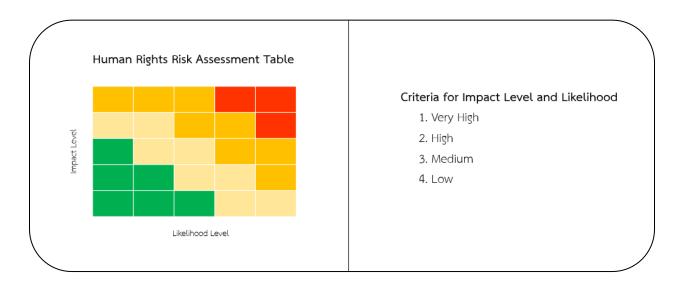
Step 1: Identification of Human Rights Issues (Human Rights Identification)

The identification of human rights issues related to the company's business activities is carried out by comparing the company with those in the service and retail sectors. The scope of human rights relevant to the company is outlined below as follows:

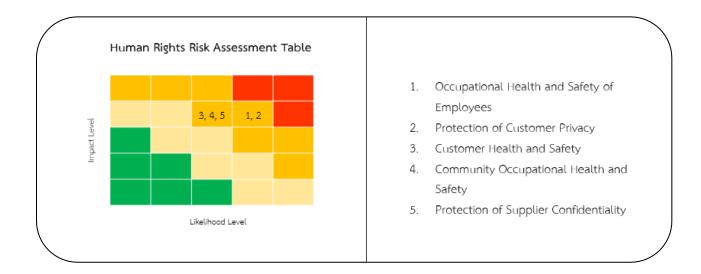
Labor Rights	Community and	Customer Rights	Supplier Rights
	Environmental		
	Rights		
• Work	Standard of	• Customer	Supplier Code
Environment	Living and	Health and	of Conduct
Occupational	Quality of Life	Safety	<ul> <li>Protection of</li> </ul>
Health and	<ul> <li>Community</li> </ul>	<ul> <li>Protection of</li> </ul>	Supplier
Safety of	Occupational	Customer	Privacy
Employees	Health and	Privacy	
• Non-	Safety	• Non-	
discrimination	<ul> <li>Access to</li> </ul>	discrimination	
Freedom of	Clean Water	Against	
Association	for the	Customers	
and	Community		
Participation	• Waste and		
in Collective	Hazardous		
Bargaining	Materials		
• Child Labor	Management		
and Forced	• Land		
Labor	Acquisition		

## Step 2: Risk Ranking

The company assesses the level of human rights risk using criteria of likelihood and impact level to rank the risks related to human rights.



In 2023, the company ranked human rights risks based on issues of impact and likelihood as follows:



# Step 3: Risk Management

The five identified human rights risk issues have been analyzed for potential risks, and the company has developed measures to mitigate impacts and processes for remediation as follows:

Risk Issues	Related Issues	Impact Mitigation and
		Remediation
Occupational Health and Safety of Employees	<ul> <li>Unsafe work         environments, such         as defective         operational         equipment.</li> <li>Non-compliance         with safety and         occupational health         regulations may lead         to workplace         accidents.</li> </ul>	<ul> <li>Establish a policy on occupational health, safety, and work environment.</li> <li>Regularly assess health and safety risks for employees.</li> <li>Implement procedures for regular operational audits.</li> <li>Consistently inspect and maintain operational equipment.</li> <li>Conduct regular training on safety and occupational health regulations.</li> <li>Set up a system for employee complaints.</li> </ul>
Protection of Customer Privacy	Leakage of customer data.	Establish a data protection committee and ensure compliance with the company's data protection regulations.

		<ul> <li>Regularly assess the company's cybersecurity readiness.</li> <li>Provide ongoing training on the Personal Data Protection Act to employees.</li> </ul>
Customer Health and Safety	<ul> <li>Non-standard products that pose safety risks to customers.</li> <li>Accidents occurring during shopping in stores.</li> <li>Store management during a virus outbreak.</li> </ul>	<ul> <li>Implement a system for selecting quality products and services according to standards, with regular audits.</li> <li>Clearly label products in accordance with legal requirements.</li> <li>Follow government regulations for store management.</li> <li>Establish a system for customer complaints.</li> </ul>
Community Occupational Health and Safety	Road accidents from transportation of goods and services.	<ul> <li>Regular vehicle fitness checks.</li> <li>Driver fitness assessments.</li> <li>Conduct alcohol level tests.</li> <li>Establish a complaint management system.</li> </ul>
Protection of Supplier Confidentiality	- Breach of supplier confidentiality, including	<ul> <li>Comply with the Trade</li> <li>Competition Act B.E. 2560</li> <li>(2017).</li> </ul>

#### 4. Remediation and Remedy

The company conducts ongoing monitoring and evaluation of its human rights practices and communicates knowledge and training to employees on human rights issues continuously. This aims to prevent problems that may pose risks of negative impacts from the company's activities and business relationships. The results for the year 2023 are as follows:

- 100% of the company's operations and business activities have undergone risk and impact assessments regarding human rights.
- 100% of the company's operations and business activities identified as having high human rights risks have implemented mitigation measures and remediation processes.
- In 2023, there were no cases or lawsuits involving human rights violations, including trafficking, forced labor, child labor, discrimination, sexual harassment or abuse in any form, freedom of association, the right to collective bargaining, equality in compensation, or other human rights issues.

Additionally, the company reports its human rights performance annually through its sustainability report or the company's website and provides a channel for all stakeholders to report human rights violations to the company through the following contact details:

#### Communication Channel

Earth Tech Environment Public Company Limited

88, 88/1 Moo 1, Ban Thad Subdistrict Kaeng Khoi District, Saraburi 18110

Phone: 02-012-7888 Fax: 02-012-7889

#### 5. Remediation and Remedy.

The company recognizes that its business activities may support or be connected to human rights violations affecting relevant stakeholders. Therefore, the company is committed to reducing the risks and potential violations that may arise to fulfill its obligations. It will conduct annual human rights risk assessments to identify human rights violations related to its business activities, as well as implement impact mitigation measures aimed at remedying and reducing the likelihood of such violations occurring from the company's business activities.

In the event of a human rights violation, the company has a fair investigation process and disciplinary measures, including:

- Verbal or written warnings
- Reduction of wages or job positions
- Suspension
- Reduction or suspension of annual bonuses
- Consideration for not adjusting wages
- Termination
- Dismissal