

Human Rights Due Diligence Policy
v2024-1
—22/Feb/2024 —

Introduction

To provide a process of due diligence and risk assessment, and to mitigate, prevent, and minimize impacts on human rights of Namyong Terminal Public Company Limited and its subsidiaries (the "**Company**") in accordance with the human rights policy, whereby, the due diligence process shall be as follows:

Scoping and Identification of Risks on Human Rights

The risk assessment on human rights covers solely on the operation of business activities of the Company, namely, the provision of terminal services and related services, the provision of warehouse services, as well as businesses of its subsidiaries and to compare with other companies in the same industry, which can be categorized into 2 main groups as follows:

- Primary activities** : **Provision of services**
- Support activities** : **Activities in the value chain involving business partners, business allies, competitors, creditors, employees, society, community, environment, shareholders, and investors**

Assessment of Existing Impacts or Possible Impacts which may arise from Activities of the Company

The Company has assessed risks on human rights to identify the existing risks and possible risks which may occur by taking into consideration of both internal and external group of the stakeholders which may be directly or indirectly affected by the business activities of the Company, and has arranged the risks on human rights from the issues which have impact and could be occurred. At present, it is found that the risks are low. The Company's management on impacts on human rights is as follows:

Risks on Human Rights	Management
The collection of personal data of employees / contractors / customers / business partner / supplier	Supporting rights of data subjects as requested in accordance with the Personal Data Protection Act B.E. 2562 (2019) (PDPA) and taking into account human rights of the data subjects without conflicting with the laws.
Discrimination against employees	Wage, overtime and wage in holiday management policy are made in accordance with labor protection law. The wages of male and female employees are not determined by gender.
Employees or car moving outsources or vendors or suppliers' working environment	<ul style="list-style-type: none"> ▪ To set standard safety measures requirements for contractors or

Risks on Human Rights	Management
	<p>suppliers starting at the procurement process.</p> <ul style="list-style-type: none"> ▪ Outsourcers must present certification of training before commencing work. ▪ To provide a good working environment where employees are assured appropriate health and safety care. ▪ To emphasize safety standards by providing training courses on safety

Process of Impact Assessment

The level of issues on human rights taken into consideration of severity and likelihood of the said issues with the following criteria:

Severity	Level of Impact	Number of Affected Individuals/ or Nature of Incident	Ability to Remedy the Impact
High	<p><u>Collection of Personal Data</u> Personal data is leaked or stolen</p> <p><u>Working Environment</u> High impact on health and safety resulting in injury.</p> <ul style="list-style-type: none"> ▪ Absence from work for more than 3 days ▪ Disabled or deceased 	<p>Threatened by cybersecurity threats or attacked by ransomware, <u>all</u> personal data of the data controller are encrypted by hacker, and there is no backup data, resulting in the leakage of personal data.</p> <p>Impact among the stakeholders</p> <ul style="list-style-type: none"> ▪ 10 or more people are absence from work for more than 3 days ▪ One or more people are disabled or deceased 	> 5 years to remedy the impact
Medium	<p><u>Collection of Personal Data</u> Receive complaints from the regulatory agencies or the stakeholders</p>	<p>Personal data is leaked on the internet or to third parties, whereby, the amount and nature of the leaked information, if being encrypted, personal data can be displayed immediately.</p>	3-5 years to remedy the impact

Severity	Level of Impact	Number of Affected Individuals/ or Nature of Incident	Ability to Remedy the Impact
	<u>Working Environment</u> Medium impact on health and safety resulting in injury (absence from work for no more than 3 days)	Impact on 2 or more stakeholders	
Low	<u>Collection of Personal Data</u> Receive complaints from the stakeholders and confirmation from the Company <u>Working Environment</u> Low impact on health and safety resulting in injuries or illnesses that can be alleviated with first aid (no absence from work)	Personal data is leaked to third parties in the amount of not exceeding 30 people and the nature of the leaked data is <u>not</u> sensitive personal data No impact on the stakeholders or less than 2 affected people are affected	1-3 years to remedy the impact

Likelihood of Occurrence	
High likelihood of occurrence	Frequently occurred: Human rights issues <u>have occurred in the past and continue to occur at present (1 time in 1-2 years).</u>
Medium likelihood of occurrence	Occasionally occurred: Human rights issues <u>have occurred in the past and continue to occur occasionally at present (1 time in 3-5 years).</u>
Low likelihood of occurrence	Rarely occurred: Human rights issues have occurred in the past and continue to <u>rarely</u> occur at present in any one business unit (1 time in 5 years or more).

Monitoring, Reviewing, Reporting on Progress and Remedy on Impacts on Human Rights

The Company monitors the work progress on human rights and reviews potential risks that may arise at least once a year and continuously conduct knowledge sharing and training for employees which cover the issues on human rights in order to prevent problems which may have risks on negative impacts resulting from the activities of the Company and its business relationships. The said work progress will be disclosed in the 56-1 One report / Annual report.

In case that the violation of human rights occurs, the Company has a fair investigation process and appropriate remedial measures in various forms which include apology, restitution, rehabilitation, monetary and non-monetary compensation in accordance with the legal framework of the relevant jurisdiction, disciplinary action of the wrongdoer and preventive studies to deter reoccurrence of such event.

Conclusion

The Human Rights Due Diligence Policy's Validity

The Human Rights Due Diligence Policy shall come into effect from 22 February 2024 and onwards until the new human rights due diligence policy is considered and approved by the Company's board of directors.