



HUMAN RIGHTS POLICY

EUROASIA TOTAL LOGISTICS PUBLIC COMPANY LIMITED

ISSUE 3

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Preparation and Approval History

Document No.	Editor/Controller	Reviewer	Approver
CP-BOD-025-02	Managing Director	Chief Executive Officer	Board of Directors
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Revision History

Issue	Issue Date	Effective Date	Revision details
1	10 October 2021	9 November 2021	First issue
2	10 June 2022	6 August 2022	Revise company name after conversion to public limited company
3	1 September 2023	12 September 2023	Amend email address of the Chairman of the CGSC

Note: To add or cancel any document, proceed according to the acts set out in the Approval and Implementation Authority.



Human Rights Policy

Euroasia Total Logistics Public Company Limited (“The Company”) and its subsidiaries operate their business and are determined to develop their business to progress and are committed to operate sustainably based on ethics and morality as a guideline. The Company aims not only to create sustainable added value for shareholders but also attaches importance to fair treatment to all stakeholders. The Company and its subsidiaries also support, promote, and are committed to adopting the UN Guiding Principles of Business and Human Rights (UNGPR) with the key principles on the protection of rights, respect for rights, and remedies when there is an impact of human rights violations due to business operations by adopting it as a policy to manage human rights to be of the same standard throughout the organization. Therefore, the Company determines the duties and responsibilities of directors, executives, and all employees in the Company and its subsidiaries to acknowledge and follow, as well as informing customers, shareholders, business partners and society. The policy provides human rights guidelines to be applied to stakeholders both inside and outside the organization. It will be about four main issues, namely, human rights of customers, human rights of employees, human rights of shareholders, human rights of partners and/or creditors.

1. Human Rights of Customers

1.1 Treat every customer equally, welcome and contact customers politely, provide information and news, and advice on the services of the Company and its subsidiaries to be effective and beneficial to the customers as much as possible as well as providing quality services that meet customers' expectations at a fair price.

1.2 Comply with conditions to customers strictly with equality and fairness regardless of race, nationality, religion, sex, language, age, skin color, education, and social status.

1.3 Protect the personal information of customers to receive the highest security in using the services with the Company and its subsidiaries.

1.4 Provide channels for customers to complain, propose opinions and suggestions. If customers have any concerns, submit them to the Company, which has proper complaint management and provides remedies if human rights are violated.



2. Human Rights of Employees

2.1 Respect the equality of persons in the employment process and provide opportunities for job applicants without discrimination on the basis of race, nationality, religion, sex, language, age, skin color, education, social status, disability, elderly, or sexual orientation.

2.2 Protect and prohibit all forms of harassment or sexual harassment in the workplace.

2.3 Protect the benefits, wages, compensation, and welfare for all employees at all levels appropriately and fairly, treat employees equally without discrimination to create peace in the management of the Company and its subsidiaries.

2.4 Promote and support good employment conditions taking into account safety, occupational health, working conditions, and working environment.

2.5 Encourage and support employees to participate in the management of activities related to the management system established by the Company regularly.

2.6 Encourage employees to develop their knowledge and abilities by giving them opportunities thoroughly and regularly and understand and develop skills and enhance attitudes appropriately. The Company and its subsidiaries regard every employee as the most valuable resource.

2.7 Pay attention to the employees' opinions and suggestions based on facts and respect the employees' rights to freedom of expression.

2.8 Provide designated channels for employees. If they have grievances, submit them to the Company according to the guidelines. The Company has proper complaint management as well as providing remedies if human rights are violated.

3. Human Rights of Shareholders

3.1 Supervise and promote the exercise of ownership rights in controlling the Company's operations, meeting attendance, expression of opinions, votes, resolutions, capital reduction, capital increase, change, transfer, distribution, and dividend payment, as well as checking the shareholder registration.

3.2 Present reports and inform data and news on the Company's business operations regularly and completely according to reality, including informing various methods in exercising the rights of shareholders in general.



3.3 Realize and give importance to the rights of shareholders as well as taking no action that is a violation or deprivation of the rights of shareholders.

3.4 Protect the personal information of shareholders for maximum security in shareholding of the Company.

4. Human Rights of Business Partners and/or Creditors

4.1 Provide opportunities for all partners to offer products and services and enter into equal and non-discriminatory partnership.

4.2 Treat business partners and/or creditors equally and fairly by taking into account the ultimate interests of the Company and based on obtaining fair returns to both parties.

4.3 Protect and not disclose information of business partners and/or creditors to business partners or others who are not related to them, including protecting, supervising, not misappropriating or misusing the intellectual property and confidential information of partners.

4.4 Uphold the principles of fair business, advertising, and competition, including complying with all laws and regulations.

In addition, the Company and its subsidiaries operate their business with accuracy, transparency, fairness and can be verified on the basis of various laws and international standards. The Company and its subsidiaries also strictly comply with the law on labor protection without coercion of labor, fix statutory working hours, and adjust wages and compensation fairly to employees by referring to the law as well as take care, encourage, and protect to conduct business that do not affect the working environment of employees and the social environment resulting from business operations of the Company and its subsidiaries.



Human Rights Due Diligence: HRDD

The Company conducts the Human Rights Due Diligence as a continuous risk management process. Its purpose is to identify, mitigate, and consider a way the Company deals with human rights impacts occurring throughout their business activities by referring to the human rights due diligence process, which consists of five steps according to the UN Guiding Principles on Business and Human Rights (UNGPs).

The Human Rights Due Diligence Process



1. A Statement of Human Rights Policy

The Company is committed to respecting the human rights of all stakeholders. The Company has operated in accordance with human rights principles and international labor standards, including the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. It includes anti-human trafficking, forced labor, child labor, non-discrimination, and all forms of threat or sexual harassment and freedom of association, the right to collective bargaining, compensation equality, and other human rights.

The Company has announced the human rights policy that fully respects human rights principles and international labor standards. There is a scope of human rights policy that includes the Company's expectations for



compliance with human rights not only in the operation of the Company but also in its subsidiaries and business partners.

The Company has also asked its business partners to answer a questionnaire on sustainability of partners with economic, social, and environmental issues. The human rights topics are included in the questionnaire to make its business partners aware of human rights issues as a priority.

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

The Company conducts a human rights risk assessment to identify the actual and potential risks arising from involvement or connection through business relationships by considering groups of internal and external stakeholders that may be directly or indirectly affected by the Company's business activities along the value chain.

Moreover, the Company takes into account vulnerable groups, such as forced labor, women, children, indigenous people, migrant workers, contracted labor of third parties, and local communities that may be involved in business activities in the human rights risk assessment process, covering issues of risks in equality, compensation, and discrimination risks.

The human rights risk assessment covers only all of the Company's business activities, accounting for 100%, which are divided into two main groups:

Main Business Activities:

- Service Operations
- Logistics Operations
- Operations of the Company and its affiliates

Support Business Activities:

- Business Partners
- Employees
- Customers
- Society and Communities
- Shareholders

that covers potential new business processes.



3. Incorporating into Company Procedures and Addressing Impacts

Step 1: Human Rights Identification

The identification of human rights issues related to the Company's business activities can be done by comparing companies in the service group. The scope of the Company's relevant human rights is shown below.

Labor Rights

- The work environment means the creation of a physical environment to be safe at work, such as the office, noise, lighting, work atmosphere, working hours, including other environmental characteristics, for example, equipment and tools that affect employees and cause satisfaction with the work.
- The occupational health and safety of employees is the operation of occupational health and safety of employees in the Company, places of operation, and plans to provide assistance; creation of awareness and access to operations on occupational health and safety for all employees.
- The non-discrimination is to treat all employees equally, including receiving fair and equal wages without criterion on ethnicity, skin color, sex, religion, region, educational institution, political opinions or others to be used for discrimination.
- The freedom of association and participation in bargaining means employees have the right to collectively negotiate their fair interests at work and freedom of association.
- The forced labor means the Company will not use forced labor or child labor, including human trafficking.

Community and Environment Rights

- The standard of living and quality of life is the Company's operation that will not cause any negative impacts on the nearby communities in matters of human rights, such as reduction in the income of people in the community.
- The occupational health and community safety is the Company's operation to be careful of operations that cause negative impacts on occupational health and community safety, such as accidents arising from the Company's operations, production of pollution to the community.
- The purchase of land is an assessment of the impact before entering operations by the Company that will not cause any impact on human rights.

Consumer Rights

- The consumer health and safety is the selection of services by the Company that meets standards, fair prices, and takes into account the health and safety of consumers.



- The data privacy is the non-infringement of customer's personal data and the Company has management guidelines to protect data privacy.
- The non-discrimination towards customers is to have management and preventive guidelines for non-discrimination against customers.

Step 2: Risk Ranking

The Company conducts an assessment of the level of human rights risk by using the criteria on likelihood and potential impact level to prioritize human rights risks.

Table of Human Rights Risk Assessment

The risk score obtained by multiplying Impact with Likelihood.	Meaning
Low Risk Level 1–4	is a low risk level that the organization should be aware of and monitor.
Intermediate Risk Level 5–8	is an intermediate risk level that should be closely monitored by the organization so that the organization can handle promptly if such risks are likely to grow.
High Risk Level 9–12	A high-level risk is a risk that, if it occurs, it will significantly affect operations and the achievement of objectives. The organization needs to establish measures to control and reduce the likelihood or impact of risks as soon as possible.
Very High Risk Level 16	A very high risk is a risk that, if it occurs, it will severely affect operations and the achievement of objectives. The organization needs to immediately establish measures to control and reduce the likelihood or impact of risks and their progress must be closely monitored.

The Company's risk appetite level is the level of risk with a low and intermediate risk with a score of 1 to 8, while the risk with a score of 9 or above is a risk that the Company must carry out the management.

Figure 2 Showing the Risk Appetite Level (Blue Line)



From the figure above Risks 2, 3 and 4 are considered the risk appetite level. The 2nd risk is the risk that the Company has to watch out for while the 1st risk is the important risk that the Company must take an action to reduce the likelihood and/or impact to an acceptable level as soon as possible.

Table 2-1 showing the impact level.

Level	Description
4	<ul style="list-style-type: none"> ● The objective performance is below an acceptable level. ● Loss of competitiveness to the extent that it may not be able to continue doing business. ● Loss of assets, personnel, and resources in the amount of 5,000,000.00 baht or more indirectly or causing the operation to be interrupted for more than 1 day. ● The information in the information system was found to be materially inaccurate and detected, such as inaccurate financial statements and fines by government agencies. ● Damage from 5,000,000.00 baht or more. ● The Company has been criticized by media and social media more than 5 days or questioned by government agencies. ● Loss of important customers accounted for income from 5,000,000.00 baht or more.
3	<ul style="list-style-type: none"> ● The objective performance is below the set target but still within acceptable criteria. ● Loss of competitiveness to the extent that it affects the market share and customers, causing the growth to be underperforming by more than 10% or more. ● Loss of property and resources amounted to indirect amounts from 500,000–5,000,000.00 baht or interrupt the operation for 8 hours. ● The information in the information system has material errors but can be corrected or clarified. ● Damage from 500,000–5,000,000.00 baht. ● Loss of important customers accounted for income from 500,000–5,000,000.00 baht. ● The Company has been sued for more than 3 days or has been fined from 500,000 baht or more.
2	<ul style="list-style-type: none"> ● The objective performance is still in accordance with the set goals, but should be monitored. ● Loss of competitiveness to the extent that it affects the market share and customers, resulting in lower than expected growth of 1–10% ● Loss of property and resources amounted to indirect amounts from 100,000–500,000 baht or cause the operation to be interrupted for 4 hours. ● The information in the information system was a material error and was detected by internal personnel. ● Damage from 100,000-500,000 baht. ● Loss of important customers accounted for sales from 100,000–500,000 baht. ● The Company has been sued until it has to stop business for 1–3 days or has been fined from 100,000–500,000 baht.

Level	Description
1	<ul style="list-style-type: none"> No effect on the operation according to the objectives Slightly loss of competitiveness Loss of assets and resources in an indirect amount less than 100,000 baht. The information in the information system is slightly wrong. Damage less than 100,000 baht The Company has received complaints from people in nearby areas or those who affected. Receive notification of canceling orders and reducing debt to customers less than 100,000 baht. The Company was fined up to 100,000 baht.

Table 3 Showing Level of Frequency and Possibility

Frequency	Annual Frequency	Probability	Defect
4	Frequent: Weekly Occurrence	Almost certain: Opportunity of Occurrence of 90% or more	There are no risk preventive measures to support or solve problems.
3	Likely: Monthly Occurrence	Likely: Possibility of Occurrence of 65%–90%	There are risk preventive measures, but they are insufficient or ineffective.
2	Possible: Yearly Occurrence	Possible: Possibility of Occurrence of 35%–65%	There are risk preventive measures that are sufficient and effective and reliable to a certain extent.
1	Unlikely: Occurrence more than once a year	Unlikely: Possibility of Occurrence of 1–35%	There are risk preventive measures that are sufficient and effective as well as very reliable.



Step 3: Risk Management

The Company assessed the current guidelines of risk controls or internal controls to reduce the impact and the likelihood of risks to an acceptable level of risk (Risk Appetite).

The Company assessed the remaining risk level after the current risk control approach that the Company has according to the risk assessment criteria and risk grading. The Company's acceptable level of risk is low and intermediate risk levels with a scale of 1 to 8, while a risk value of 9 or above is a risk that the Company must cope with it.

The Company has guidelines for managing risks and responding to risks (Risk Response) consisting of

1. **Risk avoidance** is the avoidance or cessation of actions that cause risks. It is often used in cases where high-risk risks cannot be found to be reduced/managed to an acceptable level, for example, any part of the job that the organization is not good at may avoid or stop working in that area.
2. **Risk reduction** is the reduction of the likelihood of occurrence or the impact or reduction of both by establishing various control systems to prevent or detect risks appropriately in a timely manner, such as preparing a contingency plan.
3. **Risk sharing** is reduction of the likelihood of occurrence or reduce the impact or reduce both parts by finding a joint responsible for the risk, such as buying an insurance policy.
4. **Risk acceptance** is the need to do nothing because the view that the risk is likely to occur is low and the impact of the occurrence is small. It is often used with the risk that the cost of the measure, not worth the benefits.

And the Company has defined additional risk management strategies, prepared a risk management plan to reduce the impact and the likelihood of risks to be at the acceptable risk level (Risk Appetite) of the Company. The Company has also determined responsible persons and duties and responsibilities for the risk control as stipulated appropriately and defined a period of the implementation to be the framework of the plan, including monitoring the risk management plan and the remaining risk level after the risk control.

The plan must be approved by the Risk Management Working Group. The Risk Management Committee and the Working Group have a duty to prepare and propose the plan to the Audit Committee and the Board of Directors for approval.



4. Tracking and Reporting Performance

The Company has checked and followed up the performance on human rights and continuously communicated to educate and train employees on human rights to prevent problems that are at risk of negative impacts through the Company's activities and business relationships.

The Risk Management Committee, the Corporate Governance and Sustainability Committee, and the Working Group are responsible for convening meetings as appropriate to monitor the results of humanitarian risk management, including jointly reviewing the appropriateness of the risk management plan and risk management process.

In addition to the minutes, the secretary and committee member is responsible for preparing risk management reports, and then the Chairman of the Risk Management Committee presents the reports to the Board of Directors for approval.

Additionally, the Company reports the human rights performance annually through its annual sustainability report or its website and opens a channel to listen to all stakeholders to be able to report human rights violations to the Company through the channels specified below.

1. By Postal Mail

Contact: Chairman of the Corporate Governance and Sustainability Committee

Address: Euroasia Total Logistics Public Company Limited

19,21 Motorway Road, Klongsongtonnoon, Lat Krabang, Bangkok 10520

2. By Electronic Mail (E-mail)

Contact: Chairman of the Corporate Governance and Sustainability Committee

cgsccchairman@etlgps.com

3. Telephone: (662) 123 1727

4. Channels for reporting complaints and clues on the Company's website: www.etl.co.th

5. By Whistleblower Box/Complaint Box

6. Chairman of the Board of Directors or Chairman of the Corporate Governance and Sustainability Committee

7. Supervisors whom they trust at all levels (in case it is related to senior executives or directors of the company, notify directly to the Chairman of the Audit Committee)



5. Remediation and Remedy

The Company recognizes that its business activities may contribute to or be linked to violations of the human rights of relevant stakeholders. Therefore, the Company strives and endeavors to mitigate such potential risks and violations to comply with the obligations. An annual risk assessment on human rights will be conducted to identify the situation, human rights violations in the Company's business activities, including setting up measures on impact mitigation with the purpose to correct and reduce the possibility of human rights violations that may arise from the Company's business activities.

If there are human rights violations, the Company has a fair investigation process and punitive measures as follows:

- Verbal or written warning
- Reduction of wages or job positions
- Cut or suspension of annual bonuses
- Consideration of no wage adjustment

This Human Rights Policy was considered and approved by the Board of Directors at the Meeting No. 6/2023 on September 11, 2023. It shall be effective from September 12, 2023 onwards.

Note: This English translation is for reference purposes only. In the event of any discrepancy between the Thai original Human Rights Policy and this English translation, the Thai original shall prevail.

Mr. Krishna Boonyachai
Chairman of Board of Directors

Euroasia Total Logistics Public Company Limited