

Human Rights Risk Assessment (HRRA) Report 2025

AP (Thailand) Public Company Limited

Introduction

AP (Thailand) Public Company Limited recognizes the importance of human rights in conducting its business operations. In 2022, the Company established a Human Rights Policy and conducted a human rights risk assessment to examine the human rights risks arising from its business activities that may affect both internal and external stakeholders. This process also enables the Company to identify and prioritize human rights risks at the organizational level, allowing it to effectively plan the management of impacts arising from high-risk human rights issues, conduct further impact assessments efficiently, and establish remediation mechanisms in cases where stakeholders' human rights are violated as a result of the Company's business operations.

The human rights risk assessment forms part of the Human Rights Due Diligence (HRDD) process. The Human Rights Risk and Impact Assessment (HRAA) is conducted to identify risks and prevent human rights violations or impacts arising from the Company's operations and activities throughout the supply chain, including suppliers, business partners, contractors, as well as joint ventures and associated companies over which the Company does not have management control.

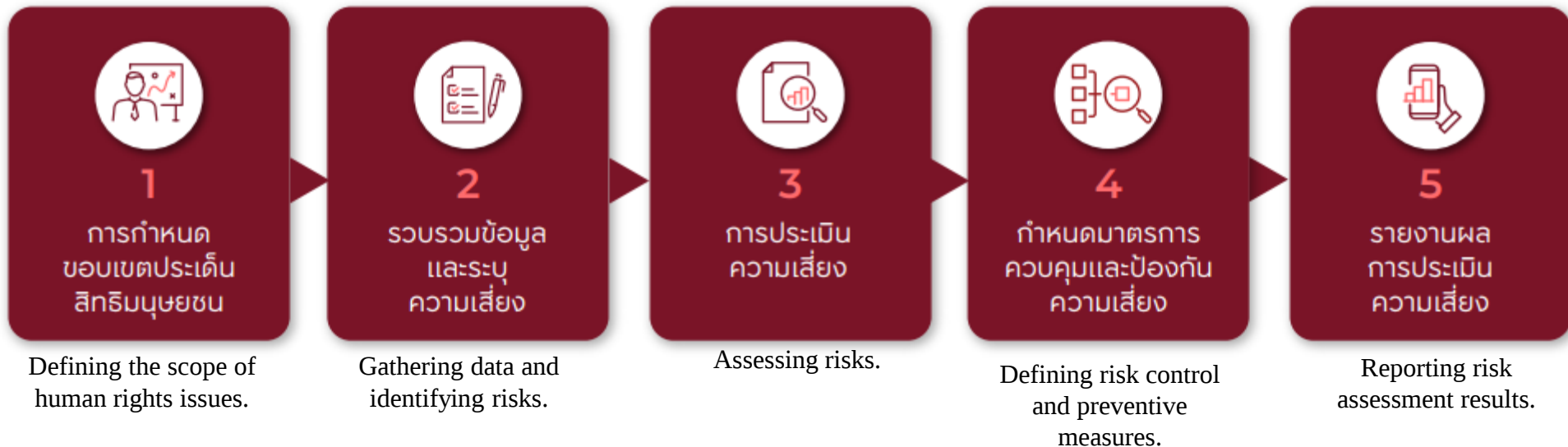
In conducting the human rights risk and impact assessment, the Company has assigned responsibility for human rights matters to the Corporate Governance and Sustainable Development Committee, which is responsible for overseeing directions, policies, and regularly monitoring human rights performance. At the operational level, the Company has established a "Human Rights Working Committee," comprising representatives from various relevant departments, to formulate action plans, drive implementation, and supervise compliance with the Human Rights Policy, including employment and labor management policies. The Working Committee reports its performance to the Corporate Governance and Sustainable Development Committee annually.



Human Rights Risk and Impact Assessment Process

In assessing each human rights issue, the Company considers two key dimensions: (1) the severity of the impact, and (2) the likelihood of the impact occurring to stakeholders. In identifying such issues, the Company places significant emphasis on stakeholder engagement, involving both internal and external stakeholders, including employees, suppliers, workers, communities, and customers. This is carried out through data collection, stakeholder consultations, and information analysis to ensure that material issues are comprehensively identified and aligned with the Company's business context. (The scope of the human rights risk assessment related to the Company's activities covers the Company, its subsidiaries, joint ventures, and business partners/contractors through

HUMAN RIGHTS RISK ASSESSMENT (HRRA)



Defining the Scope for Identifying Human Rights Issues

The scope for identifying human rights issues covers activities throughout the Company's value chain, including both the Company's direct operations and activities involving suppliers and contractors. It also takes into consideration potential impacts on relevant stakeholders, including employees, customers, suppliers, workers, and communities surrounding the project areas.

In defining such scope, the Company considers the nature of its business activities, operational areas, and relevant risk contexts in order to comprehensively and appropriately identify material human rights risk issues.





Potential Human Rights Risk Issues

Employees	Suppliers/Contractors	Community/Society	Customers
1. Working conditions	1. Health and safety of suppliers and contractors	1. Waste management	1. Customer treatment
2. Employee treatment	2. Supplier and contractor treatment	2. Health and safety in the community	2. Personal data protection
3. Health and safety of employees	3. Illegal labor (child labor, migrant labor)		
	4. Fair contract terms		



Human Rights Risk Assessment Methodology and Criteria

The Company **has established a methodology for assessing human rights risks and impacts based on two key dimensions:** the severity of impact and the likelihood of occurrence. These criteria are used to analyze and prioritize risk issues related to stakeholders affected by the Company’s business operations. The assessment of impact severity focuses on potential effects on the dignity, fundamental rights, and well-being of affected persons, taking into account the scale of the impact, the number of affected persons (scope), and the ability to restore or remedy the impact (remediability). Meanwhile, the assessment of likelihood considers the nature of the Company’s business activities, the level of control exercised by the Company, as well as past experiences or historical incidents. The Company integrates the results from both dimensions to prioritize human rights risks and uses the findings as supporting information for establishing preventive and mitigation measures, as well as for continuously monitoring the effectiveness of such measures.

Risk Assessment Criteria: Severity/Impact

Impact Level	Description
4 Very High	• Human rights impacts affect a wide area or populations beyond the scope of the operational area. • The Company is unable to control or mitigate the human rights impacts in order to restore the violated rights to affected persons. • Human rights-related impacts/incidents require assistance from independent and credible external organizations to mediate issues jointly with the Company.
3 High	• The Company intentionally provides assistance or support to operations that result in human rights violations (Legal Complicity). • Human rights impacts arising from the Company’s operations or value chain affect stakeholders within the operational area. • The Company has human rights conflicts with at-risk groups or vulnerable groups.
2 Moderate	• The Company benefits from operations conducted by other entities that result in human rights violations (Non-Legal Complicity). • The Company is unable to respond to human rights-related concerns raised by internal or external stakeholders.
1 Low	• Potential impacts arising from human rights concerns raised by internal or external stakeholders are prevented or remedied at the operational level and through the Company’s grievance management mechanisms.

Risk Assessment Criteria: Likelihood

Impact Level	Description
4 High (>25%)	Incidents occur within the operational area several times per year.
3 Moderate(10-25%)	Incidents occur occasionally within the operational area.
2 Low (1-10%)	Incidents rarely occur within the operational area, but there remains a possibility that they may occur.
1 Very Low (<1%)	Incidents occur within the same industry as the operational area; however, such incidents are unlikely to occur within the operational area.

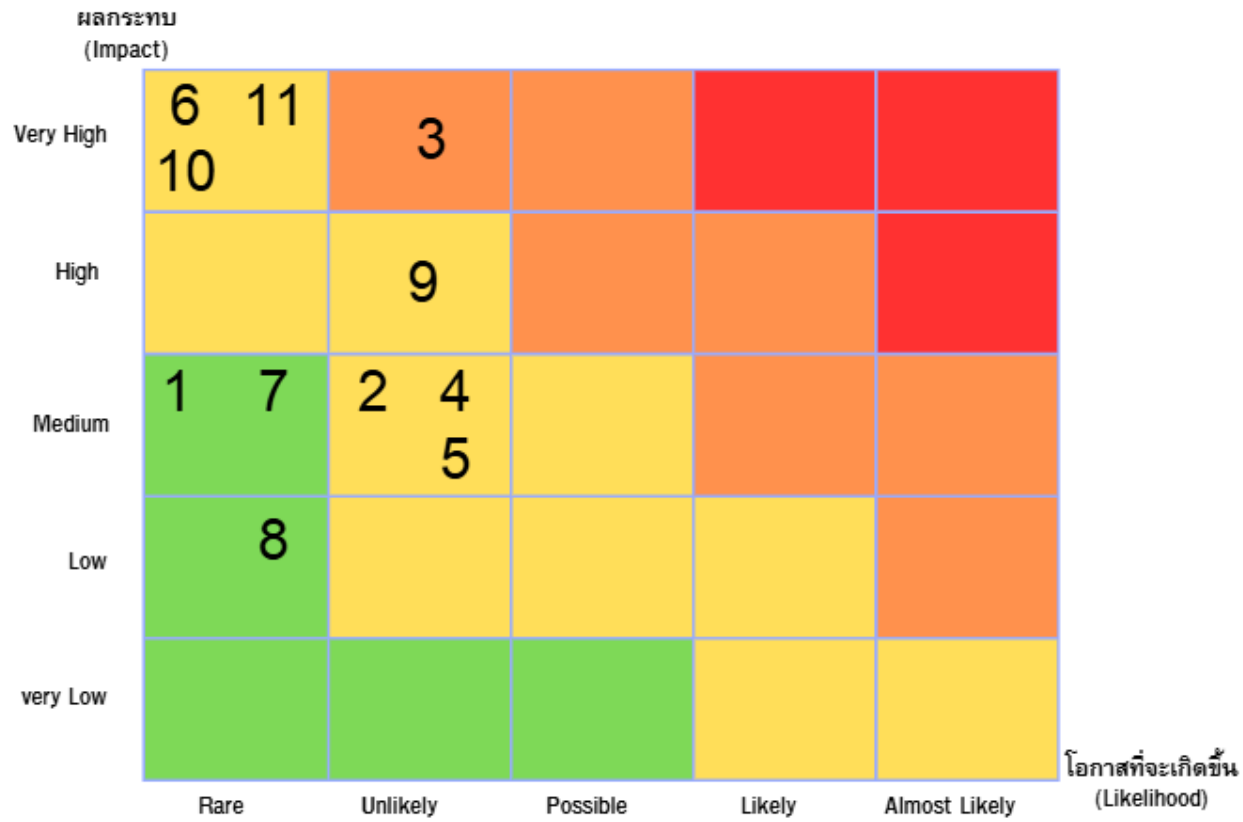
Risk Assessment Results and Human Rights Impacts

In 2025, the Company conducted a review and reassessment of human rights risks in accordance with the prescribed assessment cycle. The assessment covered operational processes throughout the value chain, including the pre-construction process, construction process, sales process, and after-sales process. It also encompassed relevant stakeholders, including employees, suppliers and contractors, communities and society, customers, as well as potentially vulnerable groups such as women, children, migrant workers, workers hired through third parties, LGBTQ+ individuals, persons with disabilities, pregnant women, and the elderly. The assessment results are as follows:

Employees	Suppliers/Contractors
1. Working conditions	4. Health and safety of suppliers and contractors
2. Employee treatment	5. Supplier and contractor treatment
3. Health and safety of employees	6. Illegal labor (child labor, migrant labor)
	7. Fair contract terms (added in 2025)
Community/Society	Customers
8. Waste management	10. Customer treatment
9. Health and safety in the community	11. Personal data protection



of the operations has been assessed for human rights risks.



Risk Protective Measures

Based on the results of the human rights risk assessment, the Company **has applied the analysis findings to establish measures for the prevention and mitigation of potential impacts on stakeholders throughout the value chain.** Priority is given to **significant high-risk** issues, while management measures are integrated into the organization's operational processes to ensure that human rights impacts can be appropriately prevented, reduced, and controlled.

Affected Rights Holders	Risk Issues	Risk Preventive Measures	Key Performance Indicators (KPIs)	Performance
Customers, Employees, Suppliers	11. Personal data protection	Develop and provide knowledge on cybersecurity systems, such as implementing Multi-Factor Authentication (MFA), to reduce security incidents.	- Data leakage incidents = 0 cases ≥ 80% of employees successfully completed PDPA training. All employees activate the required authenticator.	0 cases - In progress 100% activated
All Groups of Customers	10. Customer treatment	Establish service operation guidelines that ensure non-discriminatory practices.	≥ 80% of frontline employees receive service training. - Number of serious complaints relating to discrimination against customers = 0 cases.	100% completed 0 cases
Employees	2. Employee treatment	- Provide equal employee benefits, such as marriage benefits for employees of all genders.	- Number of complaints relating to discrimination against employees = 0 cases. - Assessment results on valuing everyone equally, embracing differences, and respecting diversity ≥ 70%.	0 cases 77 % satisfied

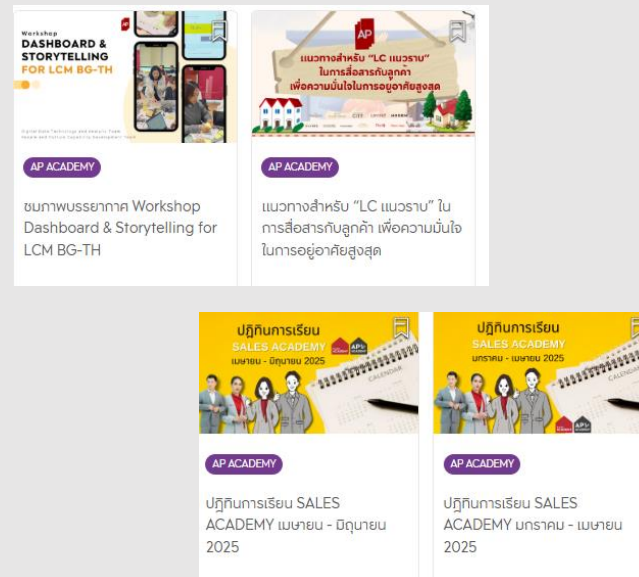
Systematic Risk Mitigation

The Company places importance on implementing preventive measures and systematic risk mitigation through promoting awareness and participation among employees, communicating and collaborating with suppliers and contractors throughout the value chain, as well as regularly monitoring operational performance. This is to ensure that the management of human rights risks remains aligned with the latest assessment results and can be continuously improved, as follows:

Personal Data Protection



Customer Treatment



Employment Treatment



Risk Monitoring, Review, and Grievance Mechanisms

During the reporting year, the Company **did not identify any material incidents relating to human rights violations, human rights abuses, labor rights violations, or forced labor arising from the Company's operations or throughout its business value chain.** Nevertheless, the Company has established grievance mechanisms and fact-finding procedures to ensure that complaints related to human rights issues are addressed appropriately and in a timely manner. The Company reviews its human rights due diligence process every two years, or whenever there are significant changes affecting its business operations, and reports the results to the Corporate Governance and Sustainable Development Committee.

Complaint Channels



whistleblowing@apthai.com



Director of Internal Audit Department, 17th Floor
AP (Thailand) Public Company Limited
Ocean Tower 1, 17th Floor
170/57 New Ratchadaphisek Road, Khlong Toei Subdistrict, Khlong Toei District,
Bangkok 10110