



Circular No. 136/2025

Human Rights Policy in Workplace

To encourage the human rights practice and human value, the two significant foundations for the development of human resource, which is the heart of sustainable business operations, Thaioil and Subsidiaries are therefore fully aware of and always respect human rights by treating the employees and stakeholders equally without discrimination against their skin colours, races, genders, religions, nationalities, poverty, disabilities and illnesses while taking high regard of the diversity in opinions, environments, laws and cultures. Thaioil and Subsidiaries thereby announce Human Rights Policy in Workplace as follows:

1. SCOPE OF WORK

Human Rights are fundamental inalienable rights and freedom which all individuals possess. The term “individuals” refer to society communities and partners through all Thaioil and Subsidiaries’ supply chain, including suppliers, contractors and partnerships. The individuals’ rights cover the rights in natural resources i.e. water, land, forest and forest products, fishery resources and other unpolluted resources.

Thaioil and Subsidiaries respect stakeholders’ human rights, as well as individuals’ inborn rights and inalienable equal rights, strictly following the principles of international human rights organizations. These include the United Nations Global Compact (UGNC), the United Nations Universal Declaration of Human Rights (UNUDHR) and the United Nations Framework and Guiding Principles on Business and Human Rights (Ruggie Framework).

2. RESPECT FOR HUMAN RIGHTS

Thaioil and Subsidiaries respect the rights of employees and stakeholders without discrimination against their perspectives, races, skin colours, religions, disabilities, birth origin, genetic information, genders, pregnancy, age, sexual orientation, gender identity, gender expression, marital status, nationalities, or other statuses considered as human rights. The scope of this human rights policy and principles covers all relevant stakeholders and affected individuals throughout the supply chain. This includes employees, suppliers, contractors, business partners, customers and consumers, local communities, as well as vulnerable or at-risk

groups. These vulnerable groups include women, pregnant women, children, the elderly, migrant workers, employees of business partners, indigenous people, LGBTQI+ individuals, and persons with disabilities, who may be at risk of human rights impacts arising from the business operations and activities within the Thai Oil Group's supply chain.

Thaioil and Subsidiaries will utilize the reasonable and comprehensive practices of human rights justice to all business operations, focusing on disposing the injustice, discrimination, threatening, and other forms of rights violations. Thaioil and Subsidiaries' principles related to human rights include:

- The commitment to protecting and preserving the rights of employees, those employed in supply chain, and those affected by the Company's operations;
- The commitment to operating based on corporate social responsibility, complying with applicable laws, and respecting the communities where the Company operates;
- The encouragement of all employment to be freely selected and the determination to refrain from any form of forced or involuntary labour;
- The opposition to child labor or practices that inhibit the development of children;
- The realization of possible risks which a risk group may face and the verification to ensure that the particular group is free from discrimination and exploitation; and
- The determination to work with suppliers whose core values and commitment to ethical business conducts match the Company's.

To demonstrate a commitment to respecting human rights, the Thaioil Group expects its employees to adhere to the principles of human rights as follows:

2.1 Thaioil and Subsidiaries' employees in all levels, must have clear and thorough understandings about relevant laws associated with work and direct responsibilities, and strictly follow them. Should the employees be uncertain of practices, it is advised to consult the law office and must not act without instruction.

2.2 Thaioil and Subsidiaries comply and categorize laws, rules and regulations for employees to study, and appropriately and adequately educate employees on the relevant laws and regulations.

2.3 Thaioil and Subsidiaries must strictly follow the international human rights, educate employees on the international human rights so that they are able to apply with their work, and must not support any business which violates the international human rights standard.

2.4 Employees who are assigned to operate abroad should study laws, cultures and traditions of the destined country prior to travelling, to ensure that products, product samples, brought equipment and travel document as well as travelling purpose and operation are legal and do not go against cultures and traditions of the destined country.

3. POLICY COMPREHENSION

The policy applies to all Thailo and Subsidiaries' employees.

4. LEGISLATION AND CODES OF PRACTICE

Thailo and Subsidiaries do not only abide by the non-discrimination laws in every country where the business is operated, but also by exceeding the current national and international legislation and relevant codes of practice. Thailo and Subsidiaries will monitor and ensure the compliance with relevant laws and policies, as well as the constant improvement of relevant underpinning legislation.

To ensure that Thailo and Subsidiaries adhere to legal requirements and continuously develop, as well as prevent, mitigate, and remedy potential impacts from its business operations, Thailo and Subsidiaries conduct comprehensive human rights due diligence. This is to ensure that the processes and business activities throughout the Thailo and Subsidiaries' supply chain, including production, labor practices, treatment of business partners, contractors, business alliances, and the creation of a working environment, will not negatively impact the human rights of stakeholders. This also demonstrates our responsibility towards the community, society, and the environment.

5. THE MINIMUM STANDARD

Any activities of Thailo and Subsidiaries must comply with local laws rules and regulations. Thailo and Subsidiaries will, nonetheless, use this policy as the minimum standard which must be followed. In case the local laws and regulations do not exist, Thailo and Subsidiaries may adjust or modify these standards as deemed appropriate without necessarily degrading the actual standard.

6. FAIR TREATMENT FOR EMPLOYEES

Thailo and Subsidiaries will treat employees fairly and honestly, regardless of where they work. All employees will be hired under terms and conditions in accordance with local laws or practices and will be given appropriate skills training.

Thaioil and Subsidiaries recognize values of each and every employee and appreciate all of their devoted support, are consistently determined for equal opportunities and discrimination resistance, and devote themselves to keep Thaioil and Subsidiaries the organization which is free from discrimination, violence, assaults, threats or harms in every possible way.

7. NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Thaioil and Subsidiaries believe that respectful and professional conducts help further the Company's mission, increase efficiency, minimize disputes, and enhance the Company's reputation. Thaioil and Subsidiaries expect every employee to show respect to colleagues, customers, and vendors. Harassment by co-workers, supervisors, or any third parties is a form of misconduct that destroys the work environment and undermines the integrity of the employment relationship. Thaioil and Subsidiaries are therefore committed to providing a work environment that is free of unlawful discrimination, and harassment as defined and protected by laws. Thaioil and Subsidiaries will not tolerate any form of discrimination or harassment that violates this policy.

7.1 NON-DISCRIMINATION

Thaioil and Subsidiaries do not discriminate against employment opportunity or races, skin colours, religions, disability, birth origins, genetic information, genders, pregnancy, age, sexual orientations, gender identities, gender expression, marital status, protected veterans status, citizenship status or any other characteristic protected by applicable laws.

The Company's policy of non-discrimination in employment applies to recruitment, hiring, compensation, promotions, transfers, discipline, demotions, contract terminations, layoffs, access to benefits and training, and all other aspects of employment.

Employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their manager or the Human Resources Department. Employees can voice concerns and submit reports without fear of retaliation. Any Thaioil and Subsidiaries' employee found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

7.2 HARASSMENT PROHIBITED

Thaioil and Subsidiaries shall provide a safe and pleasant work environment where every employee is treated with fairness and respect. It is against the Company policy to let any employee verbally or physically harass or discriminate against another employee on the basis of an individual's race, skin color, religion, birth origin, genetic information, gender, pregnancy, age, sexual orientation, gender identity, gender expression, marital status, citizenship status or any other characteristic protected by applicable laws. Harassment of employees in the Thaioil and Subsidiaries' workplace by any the third party shall not be tolerated either. Any employee who violates the Company's harassment policy shall be subject to corrective action, up to and including termination.

The violation of this policy includes verbal, physical, or visual harassment, as well as any discriminatory employment actions and any welcome or unwelcome conducts inflict on someone because of that individual's protected status.

Among the types of conduct prohibited by this policy are epithets, slurs, jokes, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. The Company prohibits the aforementioned conducts in the workplace, even if they are not sufficiently severe or pervasive to constitute unlawful harassment.

7.3 SEXUAL HARASSMENT

Sexual harassment is defined as unwelcome sexual advances, sexual abuse, sexual offer, rewards in exchange for sexual favors, and other verbal, visual or physical transgressions indicating unwelcome sexual aspects. This includes

- Explicit or implicit offer for conditions of employment;
- Acceptance or rejection of employment based on the aforementioned transgressions;
- Conducts with purpose or effect on individual's work performance, or creation of an intimidating, hostile or offensive work environment.

This policy forbids sexual harassment regardless of whether the offensive conduct is sexual in nature, and regardless of whether it rises to the level of a legal violation. Any unwelcome conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or different genders.

8. ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING POLICY

As a responsible corporate citizen, Thaioil and Subsidiaries fully support the elimination of human trafficking and slavery from the supply chain. Thaioil and Subsidiaries are determined to comply with the requirements of the Constitution of the Kingdom of Thailand and international standards such as the UN Guiding Principles on Business and Human Rights, the Core Conventions of the International Labour Organisation (ILO) and the 10 Principles of the United Nations Global Compact, besides the Company's own conducts.

Thaioil and Subsidiaries do not tolerate human trafficking, the procurement of sexual activities for commercial purpose, or the use of forced labor and all related conduct, Involuntary labor, child labor and human trafficking are outlined in the Company's Code of Conducts for Stakeholders on Business and Human Rights Policy.

9. CHILD LABOR

Thaioil and Subsidiaries are free of illegal child labor, forced labor, slave labor or labor which is forced to work overtime. Thaioil and Subsidiaries do not employ any person who is under 18 years old, except for the case which the employment is lawful and under the age, working hour, compensation, health and safety provisions.

10. SAFETY AND OCCUPATIONAL HEALTH AT WORK POLICY

Thaioil and Subsidiaries believe that sustainable success can be achieved only through determined people. No other asset in the Company is as important as the people that contribute with their work to the Company's culture and business results. Therefore, the Company devotes all the necessary energy and attention to protect employees, contractors and any other people involved with the Company along the value chain, including suppliers, customers and the public.

The Safety and Occupational Health Policy is based on Thaioil and Subsidiaries' Corporate Business Principles, and binds the whole Thaioil and Subsidiaries. To be at the forefront of accident prevention in the refinery and petrochemical industry, the Company implements in all own sites the mandatory Thaioil and Subsidiaries' Safety and Occupational Health Management System, which meets or exceeds the requirements of the health and safety laws applicable in the countries in which the Company operates.

Thaioil and Subsidiaries believe that accidents are preventable and therefore "one accident is one too many". The Company integrates safety and Occupational health in the management of business in such a

way that all activities are considered with a perspective of prevention of all types of accidents and protection of the people at work. To advance a strong safety culture that effectively prevents accidents, the Company establishes Safety, Occupational Health and Environment Committee that provides expertise advice to managers and employees.

Thaioil and Subsidiaries commit to systematic operation in order to identify hazards and manage them with appropriate risk assessments, as well as minimize dangers. The Company establishes emergency and contingency plans to cope with prevailing risks. This approach also minimizes threats to the business and protects the shareholders' interests.

11. EMPLOYMENT AND WORKING OPERATION

Thaioil and Subsidiaries have the recruitment process which is operated with just, equality and consistency for all candidates, as well as encourage all staff to equally have career advancement regardless of gender, status, nationality and religion.

12. REMUNERATION, WORKING HOURS, AND LEAVE ENTITLEMENTS

12.1 REMUNERATION AND WORKING HOURS

Thaioil and Subsidiaries uphold a commitment to providing remuneration and benefits at a level that is competitive within the industry and aligned with national standards. The Company strictly adheres to all applicable labor laws in relation to wage payments, including, but not limited to, the provision of fair and adequate wages that meet the basic living wage of employees and their dependents. Under no circumstances shall the wages paid be lower than the statutory minimum wage.

Remuneration shall be duly provided during periods of statutory leave. Thaioil Group further observes all local legislative requirements pertaining to working hours, rest periods, and wage-related matters. Working hours are established in accordance with the maximum thresholds prescribed by law.

As a matter of corporate policy, Thaioil Group endeavors to manage work schedules in a manner that minimizes or avoids the necessity for overtime work, whether such work occurs on regular working days, weekly rest days, or public holidays. In all instances, the performance of overtime work shall be strictly voluntary and subject to the prior and explicit consent of the employee.

In the event of employment mass termination, regardless of cause, the Company shall provide prior notice to the employee as prescribed by applicable labor legislation, and disburse all compensation and entitlements to which the employee is legally and contractually entitled. Such entitlements shall, under no circumstances, be less than those mandated by applicable law.

12.2 LEAVE ENTITLEMENTS

Thaioil Group accords employees with various categories of leave with pay and holidays, the terms and conditions of which shall conform to the provisions prescribed by applicable labor legislation.

13. EQUAL PAY POLICY

Thaioil and Subsidiaries support the principle of equal treatment of employment, and are committed to lawfully non-discriminate and unbiased procedures to determine wages and conditions of employment of all employees. Thaioil and Subsidiaries understand that equal pay between male and female employees is a legal right under Thai Labor Law, and therefore are committed to ensuring that the Company's employment policies and practices comply with the requirements of the Constitution of the Kingdom of Thailand and aforementioned international standards besides the Company's own conducts.

Equal pay demonstrates a commitment to fairness and is a part of the benefits from working for Thaioil and Subsidiaries. Such pay therefore includes basic payment, welfare benefits, additional payments, medical benefits, contractual payments and annual leaves.

Thaioil and Subsidiaries are committed to apply equal pay principles to all employees in order to comply with Thai Labor Law and other relevant legislations. Thaioil and Subsidiaries identify measures to avoid pay differences between male and female employees, and implement appropriate action plans to review policies and practices, as well as examine to ensure equal pay. The details are as follows:

1. Employees have the rights to receive equal pay in their employment contract considering the following

- Work appropriately assigned and matching with employee' capability
- Work ranked as 'equivalent'
- Work of 'equal value' (also referred to as equal work)
- In order to achieve and maintain equal pay, Thaioil and Subsidiaries have executed as follows:

Upon this policy, the Circular No. 74/2021 on Human Rights Policy in Workplace, dated June 14,2021 is hereby cancelled.

- Transparent pay system, of which all employees are informed
- Assurance of all part time and temporary workers as well as agencies being covered by equal pay of Thai Labour Law, and not treated any less favorably.
- Fair and equitable reward of benefits to all employee.

14. TRAINING AND DEVELOPMENT

Thaioil and Subsidiaries will provide necessary instructions and trainings for employees to ensure that the policy will be implemented effectively. Additionally, employees receive development and training to enhance their knowledge, capabilities, and essential skills for assigned tasks, and to effectively respond to changes in the industry and related technologies.

15. UNION FREEDOM SUPPORT AND NEGOTIATION RESULTS APPROVAL

Thaioil and Subsidiaries do not have policies against the labor unionization, and also encourage the compliance with labor law concerning the union's rights and freedom of negotiation, in any case. Thaioil and Subsidiaries have elected employees as representatives to negotiate and inform employees' issues to the management for collective solutions.

16. RESPECT FOR COMMUNITY, LAND, NATURAL RESOURCES, AND THE ENVIRONMENT RIGHTS

Employees of Thaioil Group shall carry out their duties with due regard to the interests and well-being of local communities, society, and the environment. They are required to fully comply with all applicable laws, regulations, and rules, and to strictly uphold the principles of human rights as they relate to communities, land, and natural resources. The Company shall operate with transparency and accountability, and actively promote community engagement to safeguard and enhance the quality of life of the communities, society, and the environment in which it conducts business operations. These efforts are aimed at fostering the sustainable development and welfare of all relevant stakeholders.

17. RESPECT FOR PERSONAL DATA AND PRIVACY

Thai Oil Group prioritizes respecting personal rights and maintaining the security of personal data related to transacted with Thaioil Group in strict accordance with Thaioil and Subsidiaries' Privacy Policy, and in compliance with relevant personal data protection laws.

18. PROMOTION OF EMPLOYEE PARTICIPATION IN PUBLIC SECTOR ACTIVITIES

Thaioil Group supports employees in performing their duties in compliance with applicable laws and government regulations. The Company shall cooperate, as appropriate, with governmental authorities, international organizations, and independent oversight bodies, in a manner that serves the best operations.

19. GRIEVANCE PROCEDURES

Thaioil and Subsidiaries have Grievance Procedures which employees can raise work-related issues. Any employee who feels that he or she has grounds for complaints in relation to bullying, discrimination, harassment or victimization, has the rights to pursue the complaint through Grievance Procedures which has been specified in the Personnel Policies and Procedures Manual or Company Regulations.

Customers who wish to make complaints are also entitled to filing complaints through the organization's complaint procedure. Thaioil and Subsidiaries will ensure that everyone has access to and capable of using the complaint/ feedback procedure according to the clue report procedure, and under the responsibility of the relevant departments.

19.1 REPORTING PROCEDURES

Any employee who believes he or she has experienced or witnessed any conduct that is in violation of this policy, should report that concern to a supervisor, Human Resources representative or Industrial and Employee Relations Section immediately. These are the individuals authorized by this policy to receive complaints on behalf of Thaioil and Subsidiaries. This policy does not require reporting harassment to any individual who is creating the harassment.

Grievances or complaints may be made verbally or in writing. If a grievance or complaint is made verbally, the employee may be asked for a written statement during the investigation. All possible complaints should include the date, time, location, details of the incident(s), names of the individuals involved, and names of witnesses to the incident(s). All grievances or complaints will be forwarded immediately to Human Resources Department for compliance with GRIEVANCE MECHANISMS AND EFFECTIVE REMEDY FRAMEWORK PROCEDURE. Any employee who is aware of conduct inconsistent with this policy or who receives or learns of a report of conduct inconsistent with this policy must report such conduct immediately to Human Resources Department.

19.2 RESPONDING TO GRIEVANCES OR COMPLAINTS

All reports describing conduct that is inconsistent with this policy will be investigated promptly and thoroughly. Employees are required to cooperate in investigations. Thaioil and Subsidiaries are committed to maintaining confidentiality to the extent possible, and taking all reasonable measures to ensure that the situation is divulged only to those with a need to know.

19.3 CORRECTIVE ACTION

Thaioil and Subsidiaries will not tolerate any harassment or discrimination in violation of this policy. If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, then Thaioil and Subsidiaries will take corrective action, including discipline, up to and including termination of employment regardless of the job positions of the parties involved.

Thaioil and Subsidiaries will consider discipline the employee with inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law. If the person who is engaged in conduct in violation of this policy, is not a Thaioil or Subsidiaries' employee, the Company will take whatever corrective action is reasonable and appropriate under the circumstances.

19.4 RETALIATION PROHIBITED

Retaliatory treatment of any employee for reporting discrimination, harassment or other prohibited behavior or for cooperating in a harassment investigation is strictly forbidden. All employees who experience or witness any conduct they believe to be retaliatory should immediately report such conduct to a supervisor, Human Resources representative or Industrial and Employee Relations Section immediately.

20. POLICY COMMUNICATION AND TRAINING

Thaioil and Subsidiaries are committed to communicating this policy and disclosing their full intent to all employees through:

20.1 COMMUNICATION THROUGH COMPANY ACTIVITIES

Communication shall be conducted through official company activities, including but not limited to employee orientation programs, townhall meetings, and other employee engagement events organized by the Company.

20.2 COMMUNICATION THROUGH OFFICIAL CHANNELS

Communication shall also be facilitated through the Company's official channels, including but not limited to corporate email, intranet, micro-learning modules via the Thail Academy application, and the official LINE account.



(Mr. Bandhit Thamprajamchit)

Chief Executive Officer and President

22nd July 2025