

Gunkul Engineering Public Company Limited and GUNKUL Group			
	Human Rights Policy	Doc. No.	POL-BOD_69-002
		Effective Date	27 FEB 2026
	Approved by the Resolution of the Board of Directors Meeting No. 2/2026 dated 27 February 2026	Issue No.	8.0
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Objectives

Gunkul Engineering Public Company Limited (“the Company”) and GUNKUL Group (“the Group”) believe that the key factors that make the Company successful and drive business to grow sustainably are conducting business with integrity and adhering to responsibility towards all groups of stakeholders. Therefore, the Company has established this policy to encourage the Board of Directors, executives, employees, and all stakeholders to acknowledge and adhere strictly to practices that are in compliance with laws and international human rights principles, in order to ensure that the Company’s business operations are free from human rights violations and are based on awareness of value and equality.

Related parties

1. The Good Corporate Governance and Sustainable Development Committee and/or the committees appointed to be responsible for overseeing that this policy is implemented correctly.
2. The Board of Directors, executives and employees at all levels have a duty to support, promote, disclose/communicate and work in accordance with this policy with awareness of the importance and respect for human rights in all aspects.
3. The Company’s business partners, joint ventures, and other relevant persons must be involved in supporting and implementing this policy.

Definitions

Any statements or words used in this policy shall have the following meanings:

“Human Rights”	The fundamental rights to which every human being is entitled and which must be protected from being discriminated against just because of differences in physical, mental, race, nationality, religion, gender, language, age, skin color, education, social status, culture, customs, or any other matters according to the laws of each country and according to the treaty that each country has obligations to comply with. These include the right to life and freedom, freedom from human trafficking, harassment, forced labor and child labor, freedom to express opinions, right to work and equal pay, and other rights such as protection of personal data, health and safety, etc.
“Discrimination”	Unequal treatment and care for individuals by imposing additional burdens or withholding equal rights or benefits instead of treating individuals fairly on the basis that each individual deserves. This discrimination may include harassment as well.

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Principles

1. The Board of Directors, executives, and all employees must recognize the importance of and respect for human rights in all aspects of individuals, as well as communities and society, in accordance with the Universal Declaration of Human Rights (UDHR), the United Nations Global Compact (UNGC), the UN Guiding Principles on Business and Human Rights (UNGPs), the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, including human rights and labor laws of respective countries that entail binding obligations, along with the Children's Rights and Business Principles (CRBP), encompassing, including:

- 1.1 To treat everyone equally according to human rights principles without discrimination.
- 1.2 To support and promote human rights, and avoid actions that violate human rights.
- 1.3 To communicate and support those involved in business operations throughout the business value chain, which include business partners, contractors, joint ventures, employees, communities, society and the environment to respect human rights and conduct business according to the principles specified in the Company's Business Ethics Policy and Supplier Code of Conduct. This included identifying human rights issues, and implementing preventive and mitigation measures, and responsibility for human rights impacts, in the event of human rights violations.
- 1.4 Be a good neighbor and a reliable partner for local communities in each project area by supporting and participating in various community development projects.

2. Human Rights Practices and Guidelines

- 2.1 To support, promote and respect human rights, respect and treat each other equally without discrimination, without discriminating on the grounds of physical or mental condition, race, nationality, religion, sex, gender identity, gender expression, sexual orientation, language, age, skin color, education, social status, culture, traditions, disability, incapacity, or any other status, encompassing all stakeholder groups, to promote diversity, equality, and sustainable coexistence.
- 2.2 To comply with international and local laws and regulations related to labor practices, ensuring the prohibition of illegal labor, including forced labor in any form, child labor or labor below the legal age threshold, convict labor, bonded labor, debt bondage, military labor, slavery, and modern-day slavery, as well as all forms of human trafficking.

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- 2.3 To support the establishment of ethical employment processes and conditions throughout the business value chain, ensuring that recruitment practices are fair and equal. Provide appropriate and sufficient remuneration and benefits to support the livelihood of all employees, considering the well-being of employees and their families. This includes allocating reasonable working hours in accordance with labor laws and standards, promoting a balance between work and personal life. Employees should be treated without discrimination, given equal opportunities, and encouraged to develop their knowledge, skills, and potential. Additionally, foster positive attitudes, ethics, and teamwork.
- 2.4 To promote the right to work in a safe and healthy environment, ensuring the safety and protection of employees, contractors, and relevant stakeholders by implementing a management system for occupational safety, health, and workplace environmental conditions. This shall be considered an important part of every project operation so that it does not affect the health and safety of others, as well as to encourage employees and related parties to be able to work efficiently by setting a goal of "zero" work accidents to prevent and minimize health and safety impacts. The Company shall also provide measures and guidelines to prevent accidents, continuously develop, improve, and raise safety operations to be above what is required by law, and do not carry out any operations without safety control measures and safety equipment. Including providing appropriate and adequate safety training and strengthening employee awareness of safety through activities to raise awareness and instill a culture of safety, protecting and maintaining a safe environment on a continuous and consistent basis.
- 2.5 To promote the right to freedom of association and collective bargaining for employees and workers in a peaceful and orderly manner, ensuring no disruption to operational efficiency or continuity, in compliance with applicable laws and business ethics. The Company shall provide opportunities for employees and workers to communicate and express their views to management regarding benefits and working conditions appropriately, free from any intimidation, harassment, or retaliation.
- 2.6 To respect the human rights of local communities by conducting business without adversely impacting the environment, health, or communities; establish feedback and consultation channels for communities adjacent to the Group's operating sites to voice concerns regarding business impacts in order to formulate effective preventive and corrective measures; and support the development of local quality of life based on the principle of Creating Shared Value (CSV) by prioritizing strategic social investments that foster value chain sustainability and stakeholder acceptance for long-term mutual benefit,

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with a focus on enhancing community well-being, promoting employment, developing occupational skills, ensuring fair and equitable local procurement, and creating opportunities for disadvantaged groups to access decent work and a healthy working environment.

- 2.7 To establish a risk assessment process for business partners and contractors on issues related to human rights and labor practices, in order to prioritize risks that may impact the Company's operations. Implement measures for close monitoring and oversight of any violations.
- 2.8 To respect and protect the privacy and personal data rights of all stakeholders and other relevant persons by maintaining the confidentiality of personal data and ensuring that its collection, use, and disclosure are carried out appropriately, lawfully, and in accordance with the Company's Personal Data Protection Notice. The Company shall also continuously develop and improve its data management systems to ensure effective personal data protection.
- 2.9 To determine goals and objectives for human rights operations, including work plans and strategies, monitor and review operations, promote continuous development and improvement in order to be able to achieve the goals as specified.
- 2.10 To establish communication and dissemination of human rights policies and practices through new employee orientation, training, meetings, or various related activities to directors, executives, employees, as well as suppliers, business partners, and relevant stakeholders in the business value chain, to ensure their active participation in conducting business ethically, respecting human rights, and treating everyone in accordance with the principles of human rights as outlined in this policy.
- 2.11 To monitor and oversee respect for human rights to cover all groups of stakeholders without neglecting when witnessing actions that are considered to be violations of human rights related to the organization and must report to the supervisor or responsible person, and cooperate in investigating the facts.
- 2.12 To establish channels for reporting complaints or whistleblowing for individuals who are affected or witness actions that may constitute human rights violations related to the Company, through the following channels:
 - 1) Submit via Email of the Audit Committee audit_committee@gunkul.com
 - 2) Submit via The Company's website www.gunkul.com
at "Whistleblowing or Complaint relating to Corruption Channel"
 - 3) Submit via Sealed postage to Chairman of the Audit Committee

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Gunkul Engineering Public Company Limited
548 One City Centre (OCC), 44th Floor, Phloen Chit Road
Lumphini, Pathum Wan, Bangkok 10330

4) Submit via “Whistleblowing and Corruption Complaints Box”

(Set in the Company and can be opened by the Secretary to the Audit Committee only)

This policy stipulates that any complaints or whistleblower information received by the Company will be thoroughly investigated and considered in accordance with the established legal processes and relevant regulations for reporting complaints or whistleblowing. Whistleblowers or complainants will be protected, and their information will be kept confidential. If the allegations are substantiated, the Company will report the findings and implement appropriate and fair remedial measures to address the human rights violations, determined by the nature and severity of the impacts. These may include apologies, monetary and non-monetary compensation, cessation or suspension of related operations, improvement or restoration of the working environment, as well as damage containment and the implementation of preventive measures against recurrence, ensuring business operations continuously comply with human rights principles and good labor standards. Any person who violates human rights shall be deemed to have breached the Company’s ethical standards and must be considered for disciplinary punishment according to the Company's regulations and/or prosecuted according to law.

2.13 To continuously develop and implement the human rights due diligence process to identify issues, assess risks and impacts of potential human rights violations and labor practices arising from business activities and within the value chain. This process should involve engagement and feedback from all relevant stakeholders, and identify individuals or groups affected throughout the business value chain, in order to plan and determine solutions and prevent human rights violations, monitor and follow up by providing appropriate remedies and mitigation processes in cases where human rights violations occur from business operations.

2.14 To review the Human Rights Policy at least once a year to ensure that it is still consistent with and appropriate to the current business conditions of the Company, and to demonstrate its commitment to creating and maintaining an organizational culture that adheres to respect for human rights in accordance with this policy.

Form

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Revision Record

Document No.	Issue No. /Revision No.	Date	Revised Part	Reason of Revision	Date of Cancellation
OMD 2563/13	1.0	2 MAR 2020	Rewritten	To determine the commitment of practice and promote the Human rights for all groups of stakeholders according to the principles of good corporate governance policy and business ethics.	1 MAR 2021
POL-BOD 64-021	2.0	1 MAR 2021	Reviewed	To determine the commitment of practice and promote the Human rights for all groups of stakeholders according to the principles of good corporate governance policy and business ethics.	12 NOV 2021
POL-BOD 64-039	3.0	12 NOV 2021	Reviewed	To determine the commitment of practice and promote the Human rights for all groups of stakeholders according to the principles of good corporate governance policy and business ethics.	8 FEB 2022
POL-BOD 65-007	4.0	8 FEB 2022	Reviewed	To determine the commitment of practice and promote the Human rights for all groups of stakeholders according to the principles of good corporate governance policy and business ethics.	27 FEB 2023
POL-BOD 66-011	5.0	27 FEB 2023	Reviewed	To determine the commitment of practice and promote the Human rights for all groups of stakeholders according to the principles of good corporate governance policy and business ethics.	28 FEB 2024
POL-BOD 67-021	6.0	28 FEB 2024	Reviewed	To determine the commitment of practice and promote the Human rights for all groups of stakeholders according to the principles of good corporate governance policy and business ethics.	27 FEB 2025
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POL-BOD 69-002	8.0	27 FEB 2026	Reviewed	To determine the commitment of practice and promote the Human rights for all groups of stakeholders according to the principles of good corporate governance policy and business ethics.	-