

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”	Basic rights that every human being should receive and 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. Including 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 increasing the load or not providing equal 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 Guiding Principles on Business and Human Rights (UNGPs), the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO), and the human rights and labor laws of each country that are binding and must be complied with, which include :
 - 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 environment. Respect human rights and conduct business according to the principles specified in the Company's Business Ethics Policy and Supplier Code of Conduct. Including identifying issues, prevention, mitigation of impacts, 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 between physical, mental, race, nationality, religion, gender, language, age, skin color, education, social status, culture, customs, sexual orientation, disability, or any other matters, 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.
 - 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,

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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 as an important part of every project operation so that it does not affect the rights 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. Also, to provide measures and guidelines to prevent accidents, develop, improve, and raise safety standards 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 association, peaceful assembly, and participation in groups for collective bargaining, including peaceful gatherings that do not affect operational efficiency or continuity, and in compliance with the law and ethical business practices. Conduct business while considering the potential negative impacts on the economy, natural resources, ecosystems, culture, lifestyles, and respecting the rights and freedoms of community members. Additionally, promote fair and equal employment and resource sourcing from local communities, including providing employment opportunities and creating jobs for disadvantaged groups, ensuring access to valuable work and a good working environment for local communities. Furthermore, encourage local skill development to create employment opportunities, improve the quality of life, and support sustainable well-being in the local community.
- 2.6 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.
- 2.7 To give importance to maintaining privacy, protecting the personal data and privacy rights of stakeholders/ related persons strictly, keeping information confidential, disclosing and utilizing personal data of all groups of stakeholders equally by creating Personal Data Protection Policy and developing a data management system for maximum efficiency.

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2.8 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.

2.9 To establish communication and dissemination of human rights policies and practices through 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.

2.10 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.

2.11 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
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. While those who violate human rights are considered to be unethical and must be considered for disciplinary punishment according to the Company's regulations and/or prosecuted according to law.

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2.12 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.

2.13 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 commit 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
POL-BOD 68-009	7.0	27 FEB 2025	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 2026

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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.	-