

Human Rights Due Diligence

S P V I Public Company Limited

S P V I Public Company Limited (“the Company”) recognizes the importance of respecting and protecting human rights throughout its business operations. The Company is committed to conducting its business in alignment with international principles and the expectations of all stakeholder groups, including employees, suppliers, customers, communities, and society at large.

Accordingly, the Company has established a Human Rights Due Diligence (“HRDD”) framework as part of the Company’s risk management process. The framework is implemented on an ongoing basis and covers the identification, assessment, prevention, mitigation, monitoring, and review of human rights risks and impacts that may arise from the Company’s operations and supply chain. This is to ensure that the Company conducts its business responsibly, transparently, and in accordance with internationally recognized human rights principles.

The HRDD framework is developed with reference to the United Nations Guiding Principles on Business and Human Rights (“UNGPs”), comprising the following five key elements:

1. Policy commitment and principles on respect for human rights
2. Assessment of actual and potential human rights impacts arising from the Company’s activities
3. Integration of policies and assessment results into internal and external control mechanisms
4. Monitoring and reporting of performance
5. Remediation and corrective actions

1. Policy Commitment and Principles on Respect for Human Rights

The Company is committed to respecting the human rights of all stakeholders by adhering to internationally recognized human rights principles and labor standards, including the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. This commitment covers the prevention of human trafficking, forced labor, child labor, discrimination, harassment, and all forms of sexual harassment, as well as the protection of freedom of association, collective bargaining rights, equal remuneration, and other fundamental human rights.

The Company places significant importance on respecting and protecting human rights in all aspects of its business operations in accordance with the UNGPs and applicable laws and regulations. The Company is committed to conducting its business with integrity, transparency, non-discrimination, and respect for human dignity toward employees, customers, suppliers, and all stakeholder groups. In addition, the Company promotes a fair, safe, equitable, and harassment-free working and service environment.

2. Assessment of Actual and Potential Human Rights Impacts Arising from the Company's Activities

The Company conducts assessments of human rights risks and potential human rights impacts arising from its business activities. Such assessments cover the identification of human rights issues affecting all stakeholder groups, including employees, suppliers, customers, communities, persons with disabilities, and child labour-related issues

The human rights risk assessment encompasses the Company's core business activities, including product operations, service operations, and distribution activities. The assessment also considers both internal and external stakeholders who may be directly or indirectly affected by the Company's business activities throughout the value chain.

3. Integration of Policies and Assessment Results into Internal and External Control Mechanisms

3.1 Identification of Human Rights Issues

The Company has identified potential human rights risks that may arise throughout its business operations and value chain as follows:

Employee Rights	Customer Rights	Supplier Rights	Community and Social Rights
1. Employee discrimination	5. Customer health and safety	8. Protection of suppliers' confidential information	10. Waste and hazardous waste management affecting communities
2. Occupational health and workplace safety	6. Protection of customer privacy and personal data	9. Supplier discrimination	
3. Illegal labor practices (including child labor and forced labor)	7. Customer discrimination		
4. Protection of employees' personal data			

3.2 Risk Prioritization

The Company assesses human rights risk levels using likelihood and impact level criteria to prioritize human rights risks appropriately.

Human Rights Risk Assessment Matrix

					Impact and Likelihood Rating Criteria: 1. Very Low  2. Low  3. Moderate  4. High  5. Very High 

In 2025 (B.E. 2568), the Company prioritized human rights risks based on the significance of impacts and likelihood across the following ten issues:

1. Employee discrimination
2. Occupational health and workplace safety
3. Illegal labor practices
4. Protection of employees' personal data
5. Customer health and safety
6. Protection of customer privacy and personal data
7. Customer discrimination
8. Protection of suppliers' confidential information
9. Supplier discrimination
10. Waste and hazardous waste management affecting communities

High Impact Level					
	8,9				
		2,4			
	1,3,5,6,10				7

Likelihood Level

3.3 Risk Management

The Company has analyzed the ten prioritized human rights risk issues and established preventive and mitigation measures to manage potential risks and impacts as follows:

Human Rights Risk Issue	Preventive and Mitigation Measures
1. Discrimination against employees	- Strictly comply with the Company's Human Rights Policy by ensuring that all human resource management practices are free from any form of discrimination. - Communicate relevant guidelines, criteria, and rationales relating to employee matters in an appropriate and transparent manner to prevent misunderstandings and reduce discrimination risks.
2. Occupational health and safety of employees	- Strictly comply with the Company's Occupational Health, Safety and Work Environment Policy, and consistently cooperate with and adhere to community safety requirements and regulations.
3. Illegal labor practices (Child labor and forced labor)	- Strictly comply with the Company's Human Rights Policy by ensuring that employment practices are aligned with the policy prohibiting child labor and forced labor.
4. Protection of employees' personal data	- Establish appropriate practices for accessing, using, and retaining employees' personal data, with access restricted only to authorized personnel based on their duties and responsibilities. - Control the use and disclosure of employees' personal data to ensure it is used solely for purposes necessary for human resource operations, and provide relevant employees with knowledge and guidance on personal data protection practices.
5. Customer health and safety	- Inspect and select products to ensure compliance with relevant standards. - Provide training for sales and service personnel on product features, precautions, and safety instructions to enable them to provide appropriate recommendations to customers. - Establish complaint channels and remediation processes in the event of impacts on customers' health and safety.
6. Protection of customer data privacy	- Establish an Information and Cybersecurity Policy. - Implement appropriate practices for the collection, use, disclosure, and retention of customers' personal data, while restricting access to authorized employees based on their duties and responsibilities and ensuring compliance with personal data protection laws.

Human Rights Risk Issue	Preventive and Mitigation Measures
	- Provide training and communication on personal data protection awareness (Personal Data Protection (PDPA) Awareness) to employees with access to customer data, such as sales personnel and online support staff, to ensure proper understanding and reduce the risk of inappropriate use or disclosure of data.
7. Discrimination against customers	- Provide employee training on customer treatment and equitable service practices. - Strictly comply with the Company's Human Rights Policy, particularly with respect to equal treatment and non-discrimination toward customers.
8. Protection of suppliers' confidential information	- Comply with the Company's policies and requirements relating to suppliers. - Adhere to suppliers' confidentiality agreements. - Provide employees and relevant parties with knowledge and communication regarding the proper use and management of supplier information.
9. Discrimination against suppliers	- Establish channels for suppliers to report complaints or concerns regarding unfair treatment. - Communicate the Supplier Code of Conduct, including non-discrimination principles, to relevant parties.
10. Waste and hazardous waste management affecting communities	- Strictly comply with the Company's Environmental Policy. - Monitor waste and hazardous waste management on a monthly basis to ensure that no waste is released in a manner that adversely affects surrounding communities.

4. Monitoring and Performance Reporting

The Company has established a systematic process for reviewing, auditing, and monitoring the management of human rights-related issues by considering the defined scope, risk issues, and key risk indicators. The Company has also designated responsible functions to provide detailed reporting on implementation results to the Audit Committee, the Risk Management Committee, and the management team. In addition, such results are regularly reported to executives and relevant departments on an annual basis to ensure that all employees maintain awareness of and place importance on human rights risk issues.

The Company also maintains comprehensive and systematic risk management plans to effectively respond to potential incidents.

4.1 Communication Channels

The Company provides the following channels for reporting misconduct, inappropriate conduct, or actions that may cause adverse impacts. A total of two reporting channels are available as follows:

- Through the MIHCM System (Reach HR Menu)

Employees may submit whistleblowing reports or complaints through the MIHCM system under the Reach HR menu. Whistleblowers and complainants will be protected and their information will be kept confidential.

- By Mail to the Company's Address

Reports may be submitted to:

S P V I Public Company Limited

2 Premier Place Building, 3rd Floor, Soi Premier 2, Srinakarin Road, Nong Bon Subdistrict, Prawet District, Bangkok 10250, Thailand

- Attention: Internal Audit Department; or
- Attention: Company Secretary

- By E-mail

- Internal Audit Department: spviwhistleblowing@spvi.co.th
- Company Secretary: companysecretary@spvi.co.th

In the event of an alleged human rights violation, In the event of a human rights violation, the Company will conduct a fact-finding investigation and appoint an external committee to carry out the investigation. The results of the investigation will be communicated to the whistleblower.

5. Corrective Actions and Remediation

The Company has established grievance mechanisms through various reporting channels to address complaints related to human rights violations. The Company is committed to minimizing the risk of such violations and preventing their recurrence in accordance with its commitments. Human rights risk assessments are conducted annually to identify human rights violation situations that may arise from the Company's business activities. Lessons learned are summarized and used to develop measures to prevent recurrence.

5.1 Remediation Measures and Disciplinary Actions

The Company provides appropriate remedies to affected parties through both verbal and written apologies, as well as monetary and non-monetary forms of compensation. Such remedies may

include the restoration of rights or conditions adversely affected, counseling and psychological support, and the protection of the personal data of affected individuals.

The Company also imposes disciplinary actions on individuals responsible for human rights violations in proportion to the severity of the misconduct. Disciplinary measures may range from verbal warnings, written warnings, suspension without pay, withholding salary increases or bonus payments, to termination of employment or dismissal. All disciplinary actions shall be implemented fairly, transparently, and in accordance with the Company's rules, regulations, and applicable procedures.

This Human Rights Due Diligence (HRDD) shall become effective on 5 February 2026, as approved by the Managing Director.

Announced on 5 February 2026.

- Signature –

(Mr. Trisorn Volyarngosol)

Managing Director

S P V I Public Company Limited