

SUPALAI

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สร้างสุข



HUMAN RIGHTS RISK ASSESSMENT (HRRRA)

2025



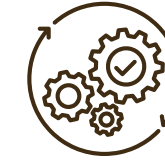
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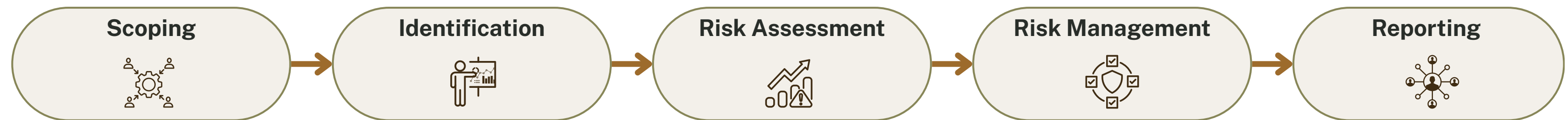


HUMAN RIGHTS ASSESSMENT: OVERVIEW

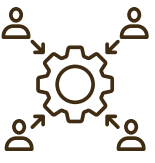


- Supalai has conducted a Human Rights Risk Assessment (HRRRA) as a key component of its Human Rights Due Diligence (HRDD) process. The objective of this assessment is to identify, evaluate, and manage potential human rights risks that may arise from the company's business operations and activities across its value chain, including suppliers, contractors, and business partners.
- The scope of the assessment covers all core business activities of Supalai, its subsidiaries under operational control, and relevant stakeholders across the value chain. The assessment is conducted annually. The company will establish human rights considerations as one of the criteria in the decision making process for business expansion
- The primary objective of this process is to ensure that any potential or actual human rights impacts are effectively identified, prevented, and mitigated. This is achieved through the implementation of appropriate remediation and risk control measures across Supalai's operations and value chain.

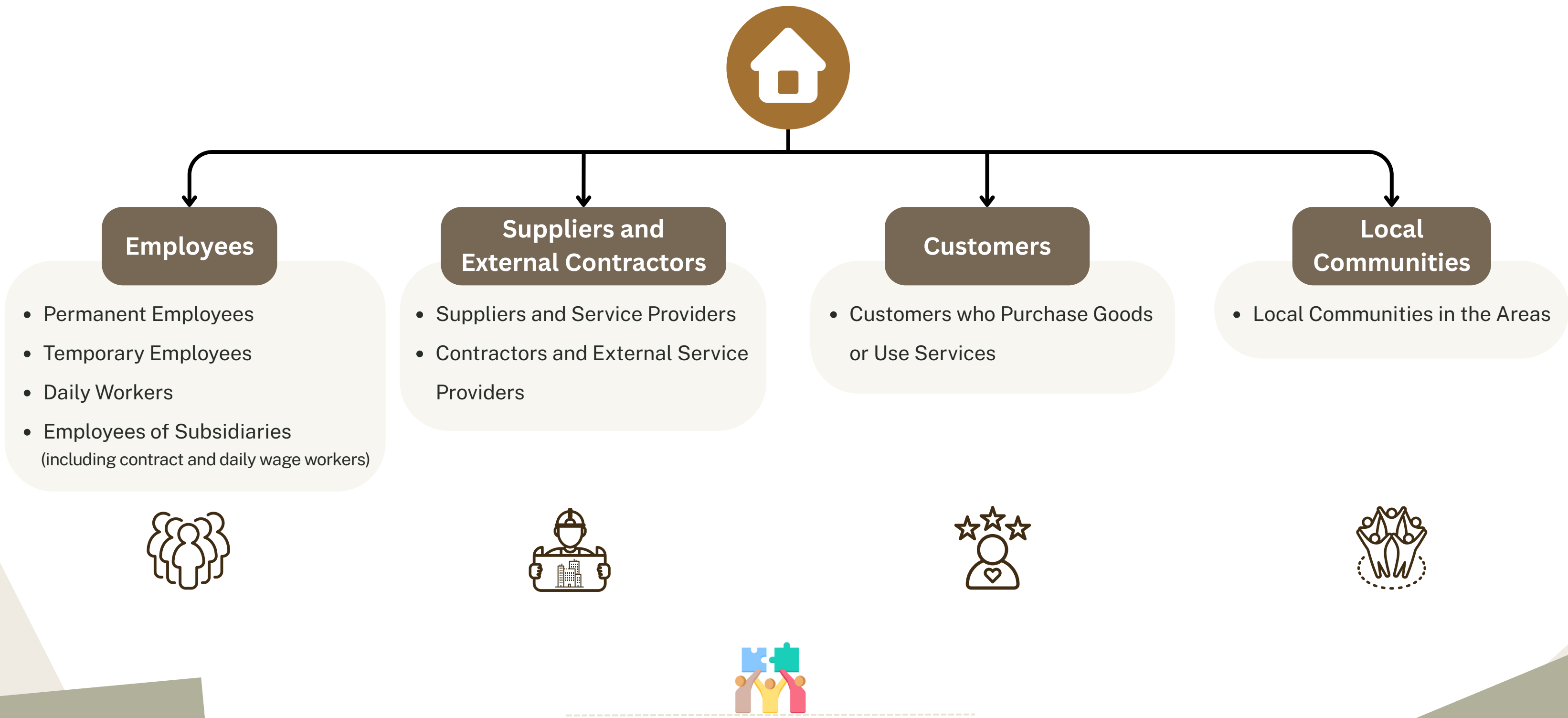
Human Rights Risk Assessment Process Flow



SCOPE OF THE RISK ASSESSMENT



Supalai conducts comprehensive human rights due diligence and assesses potential risks throughout the value chain, covering both the company's operations and its subsidiaries. This is to ensure the protection and respect of the rights of stakeholder.



IDENTIFICATION OF HUMAN RIGHTS RISK



The company identifies and assesses human rights risks that may arise from its activities, subsidiaries, suppliers, and external contractors. Such risks are considered across all stakeholder groups, with particular emphasis on vulnerable groups such as migrant workers, female workers, child labor, LGBTQ+ individuals, and persons with disabilities. The purpose is to prioritize risks and plan appropriate management measures.

Core Business Activities	Procurement	Design and Construction	Sales	After-Sales Service
Human Rights Issues	<ul style="list-style-type: none"> • Labor Rights • Rights of Suppliers and External Contractors 	<ul style="list-style-type: none"> • Labor Rights • Community Rights • Rights of Suppliers and External Contractors 	<ul style="list-style-type: none"> • Consumer Rights • Labor Rights 	<ul style="list-style-type: none"> • Labor Rights • Consumer Rights • Rights of Suppliers and External Contractors
Rights Holders	<ul style="list-style-type: none"> • Employees • Suppliers and External Contractors 	<ul style="list-style-type: none"> • Local Communities • Employees • Suppliers and External Contractors 	<ul style="list-style-type: none"> • Customers • Employees 	<ul style="list-style-type: none"> • Customers • Employees • Suppliers and External Contractors



IDENTIFICATION OF HUMAN RIGHTS RISK



1. Identification of Human Rights Issues

The company has identified human rights risk issues related to its operations and value chain by considering potential impacts on stakeholders and vulnerable groups, through internal data analysis, future trend research, and benchmarking against industry peers.

Labor Rights	Community Rights	Consumer Rights	Suppliers and External Contractors
<ul style="list-style-type: none"> 1. Non-discrimination and equal opportunity 2. Safe and hygienic working conditions 3. Forced labor, child labor, female workers, and irregular labor 4. Harassment and Violence 5. Protection of personal data 6. Freedom of association and collective bargaining 	<ul style="list-style-type: none"> 7. Respect for land rights and fair access to land 8. Community well-being and quality of life 9. Community engagement and participation 10. Environmental and water resource management 	<ul style="list-style-type: none"> 11. Non-discrimination against customers 12. Product and service safety 13. Protection of customers' personal data 	<ul style="list-style-type: none"> 14. Non-discrimination against suppliers and external contractors 15. Occupational Health and Safety of External Contractors 16. Fair contract terms and working conditions 17. Labor rights in the supply chain 18. Confidential business information and data protection

2. Assessment of inherent risks

The company assesses inherent human rights risks, those arising from business activities without any control or mitigation measures in place.

3. Assessment of residual risks

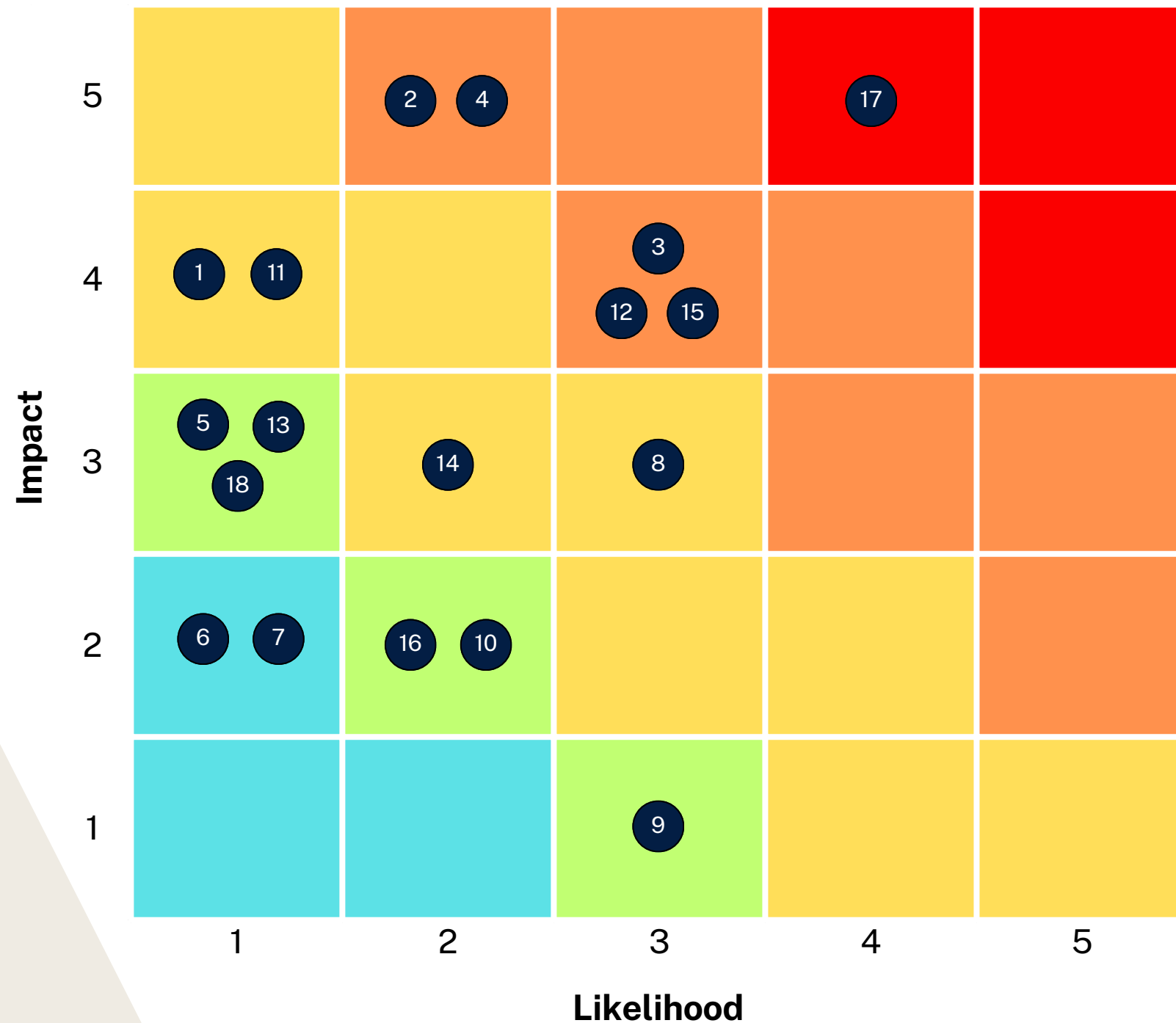
The company evaluates residual human rights risks that remain after existing mitigation measures or risk management controls have been implemented, This helps assess the adequacy and effectiveness of current mitigation efforts in protecting stakeholder rights.

4. Prioritization of risks

The Company prioritizes issues based on the severity of impacts, designating the group of Occupational Health and Safety issues as the most significant Salient Human Rights Issues, as they directly affect the lives and well-being of all stakeholders. These issues are therefore regarded as the most critical foundation for conducting a sustainable real estate business

RISK ASSESSMENT MATRIX

Results of the human rights risk assessment on material issues relevant to the Company's business operations

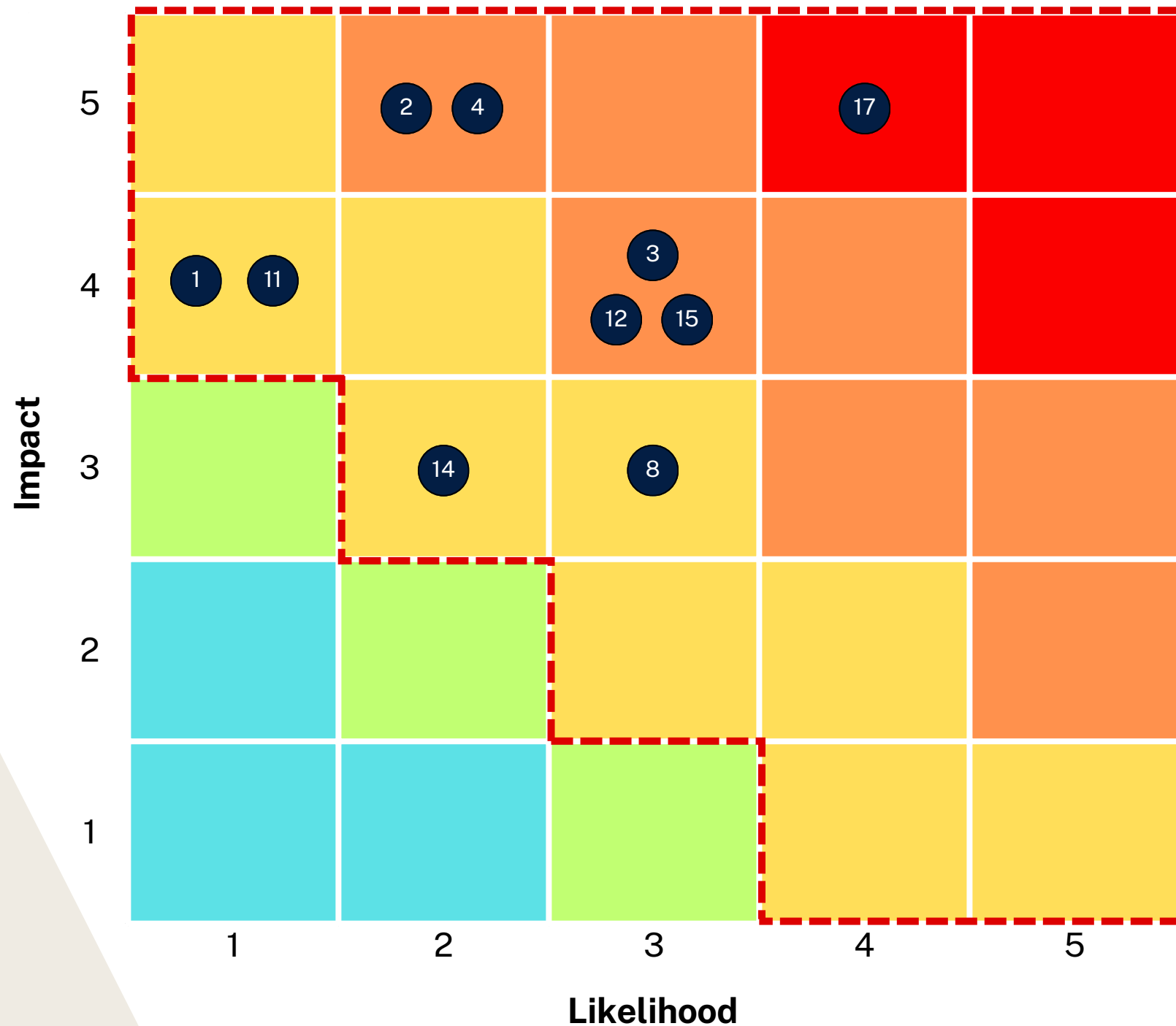


Color	Description of Risk Levels
Red	<p>Very High Risk Level</p> <p>Relevant activities must be halted, and high-level control measures must be implemented. Continuous and close monitoring and evaluation are required, along with actions to reduce the likelihood and impact to an acceptable level.</p>
Orange	<p>High Risk Level</p> <p>Requires strict control: close and continuous monitoring, and proactive measures to reduce the likelihood and impact to an acceptable level.</p>
Yellow	<p>Medium Risk Level</p> <p>The risk remains acceptable: A control or management plan must be established, Needs assessment of potential cumulative impacts that may become significant.</p>
Green	<p>Very Low to Low Risk Level</p> <p>The risk is generally acceptable: Periodic assessment is recommended to monitor cumulative risks that may escalate over time.</p>
Blue	

RISK ASSESSMENT MATRIX



Critical Human Rights Risks Requiring Control or Management Plans



Labor Rights

- 1 Non-discrimination and equal opportunity
- 2 Safe and hygienic working conditions
- 3 Forced labor, child labor, female workers, and irregular labor
- 4 Harassment and Violence

Community Rights

- 8 Community well-being and quality of life

Consumer Rights

- 11 Non-discrimination against customers
- 12 Product and service safety

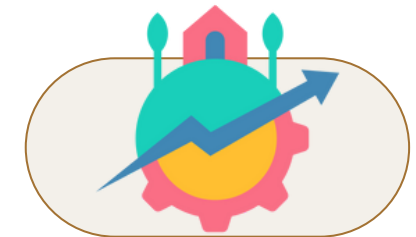
Suppliers and External Contractors

- 14 Non-discrimination against suppliers and external contractors
- 15 Occupational health and safety of external contractors
- 17 Labor rights in the supply chain

RISK MANAGEMENT MEASURES



Based on the results of the human rights risk assessment of the company, its subsidiaries, and the activities of suppliers and external contractors, it was found that human rights risks level from very low to very high in severity. For low-level risks, the company has continuously monitored and assessed these risks to prevent their accumulation and potential development into more severe issues in the future. For risks at moderate levels and above, the company has established management approaches and mitigation measures to prevent potential human rights impacts on stakeholders, as follows:



8 -----> Impact on Community Resources and Livelihoods

Description	The construction project has the potential to impact surrounding communities through noise, dust, air pollution, and increased traffic and congestion, which may affect the health, safety, traditional lifestyles, and quality of life of nearby residents.
Affected rights holders	Nearby Local Communities, commuters in the project area, and vulnerable groups such as children, elderly individuals, and persons with disabilities.
Preventive and Mitigate measures	<ul style="list-style-type: none">• Conduct a comprehensive Environmental Impact Assessment (EIA) and publicly disclose the findings.• Implement communication channels to receive and address community grievances in a transparent and timely manner.• Promote corporate social responsibility (CSR) initiatives in the area, such as community environmental improvement, support for local events.• Facilitate community participation in monitoring and provide opportunities to give feedback on issues that may affect their daily lives, such as transportation, construction activities, and construction operating hours.



RISK MANAGEMENT MEASURES



2 12 15 → Occupational Health and Safety

<p>Description</p>	<p>The Company recognizes that safety is a fundamental foundation of its real estate business operations. Accordingly, issues related to Occupational Health and Safety have been designated as the most significant Salient Human Rights Issues, as they represent risk dimensions with severe impacts on life and physical well-being.</p> <p>In the absence of effective management, such risks may lead to accidents, injuries, or work-related illnesses that are difficult or impossible to remediate (Irremediable). These impacts span from working conditions at construction sites affecting employees and contractors to the structural safety and long-term usability of residential properties for occupants.</p>
<p>Affected rights holders</p>	<p>Employees of the company, customers, suppliers and external contractors, particularly field workers, construction site workers, and workers with physical limitations, such as individuals with disabilities, those with visual or hearing impairments, and other vulnerable groups such as pregnant women.</p>
<p>Preventive and Mitigate measures</p>	<ul style="list-style-type: none"> • Continuously monitor and assess contractors’ occupational health and safety standards, with emphasis on strict compliance requirements, safe working environments, and the provision and proper use of personal protective equipment. • Conduct regular practical training and safety awareness sessions, particularly for site workers. • Develop and design spaces to be safe for everyone, such as wheelchair ramps, handrails in risk areas, emergency alert systems. • Communicate safety information by posting safety signs at construction site entrances to raise awareness and enforce safety protocols. • Regularly inspect the quantity and condition of safety equipment, such as personal protective equipment, fire extinguishers, first aid kits, and emergency exits, to ensure they are adequate, easily accessible, and appropriate. Conduct emergency drills regularly. • Conduct safety inspections at work and construction sites by Safety responsibility holder and Occupational safety officer, with findings reported to project meetings and relevant management within specified timeframes. • Establish a Business Continuity Plan (BCP) and a Disaster Recovery Plan (DRP) to ensure operational resilience. • Implement an ongoing support program for field-based workers, such as the “Waen Sang Suk” project for external contractor workers, to promote access to eye examinations and the provision of visual aid devices, thereby improving safety and quality of life.



RISK MANAGEMENT MEASURES



3 4 17 -----> **Labour Rights and Forced Labour**

<p>Description</p>	<p>The company is at risk of being directly or indirectly involved in labor rights violations, such as the use of forced labor, employment of unregistered workers, unpaid or inadequately compensated overtime work, physical and psychological harassment in the workplace, including the lack of adequate control or oversight mechanisms in the supply chain, which are difficult to monitor and may create opportunities for labor rights violations in operational processes.</p>
<p>Affected rights holders</p>	<p>Employees of the company, workers in the supply chain, as well as those employed by business partners and external contractors, particularly daily wage workers, construction site workers, women workers, and vulnerable groups such as persons with disabilities or pregnant women, are at heightened risk of labor rights violations.</p>
<p>Preventive and Mitigate measures</p>	<ul style="list-style-type: none"> • The process of selecting business partners and external contractors incorporates human rights criteria into the evaluation. • Communicate to all key suppliers and external contractors to acknowledge and comply with the Supplier and Contractor Code of Conduct. • Provide training for employees, suppliers and external contractors on labour rights and preventing forced labour. Disseminate information and best practice guidelines on labour rights within our organization and throughout the supply chain. • Conduct periodic environmental, social, and governance (ESG) assessments of our suppliers and external contractors. • Require suppliers and external contractors to complete an annual self-assessment, with continuous monitoring and analyzing human rights compliance and labour practices. • Develop communication materials to disseminate information about the grievance mechanism, ensuring workers and vulnerable groups can easily access and understand it. Emphasize the safe and anonymous use of the grievance channels, while continuously monitoring and improving the grievance handling process. • Conducted a Focus Group discussion to gather feedback from stakeholders on sustainability, governance, and risk management. In 2025, participants included business partners and external contractors.

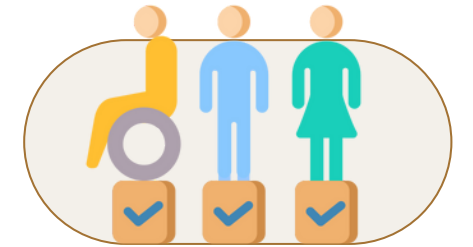


RISK MANAGEMENT MEASURES



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Non-Discrimination and Equal Opportunity



Description

The company is at risk of discriminating against certain individuals or groups, as well as failure to uphold rights, diversity, and equality, whether intentional or unintentional. For instance, certain employee groups may not have equal access to training and skill development opportunities, or services may not be provided in accordance with the principles of equality, and discriminatory practices may also occur in the selection of suppliers and external contractors.

Affected rights holders

Employees within the company, customers, suppliers, and external contractors, particularly vulnerable groups such as persons with disabilities, migrant workers, female employees, LGBTQ+ individuals, as well as individuals with differing political views and other groups with diverse identities or beliefs.

Preventive and Mitigate measures

- Develop a policy on diversity, equity, and non-discrimination, and communicate it to relevant stakeholders and interested parties to serve as a guideline for operations both within the organization and with suppliers and external contractors.
- Define Diversity & Inclusion (D&I) KPIs to measure performance, including issues related to discrimination and equal opportunity.
- Provide training on rights awareness and equality, including safe grievance channels, to promote understanding of diversity and equality, and ensure complaints are managed appropriately and fairly.
- Support employment or procurement from small businesses, women, persons with disabilities, or vulnerable groups to promote social-economic equality.
- Monitor and investigate complaints regarding discrimination from customers, suppliers and external contractors.



REPORTING AND GRIEVANCE

The Company is firmly committed to preventing and addressing human rights violations. It has implemented appropriate remediation measures, including financial assistance and other forms of support, to mitigate any potential impacts arising from its operations. In addition, the Company provides an accessible, transparent, and effective grievance mechanism, along with adequate and fair remediation processes. Furthermore, the Company supports and encourages its contractors to consistently implement human rights measures and conduct regular supply chain due diligence (HRDD) reviews. This ensures that its partners and external contractors throughout the supply chain comply with all relevant requirements.

In 2025, the Company did not receive any reports or complaints regarding human rights violations or involvement in such violations.



Grievance and Reporting Channels

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