

Human Rights

Civil Engineering Public Company Limited and its subsidiaries (the "Company") maintain an unwavering commitment to respecting and upholding human rights in accordance with applicable laws and internationally recognized standards. This commitment encompasses all aspects of business operations and extends to all stakeholders, including employees, business partners, contractors, suppliers, customers, and local communities where the Company operates.

The Company's human rights approach is grounded in recognized international frameworks and principles:

1. Constitution of the Kingdom of Thailand
2. Universal Declaration of Human Rights (UDHR)
3. UN Guiding Principles on Business and Human Rights (UNGPs)
4. UN Global Compact Human Rights Policy Development Guide
5. ILO Declaration on Fundamental Principles and Rights at Work
6. Children's Rights and Business Principles
7. Applicable labor laws in all operating jurisdictions and countries

Our targets

The Company prioritizes human rights respect and has established the clear objective of achieving zero human rights violations across all operations and relationships. This commitment is implemented through systematic programs and proactive measures:

- The Company ensures 100% of employees receive training and assessment on human rights principles, responsibilities, and implementation.

- The Company conducts human rights due diligence (HRDD) across operations, supply chains, and business relationships. This proactive approach identifies potential and actual human rights impacts, evaluates risk factors, and implements preventive measures before violations occur.
- The Company maintains close engagement with stakeholders to build shared understanding of human rights responsibilities and collaborate on prevention efforts.

Human Rights Implementation Framework

The Company implements a comprehensive framework for preventing and mitigating human rights risks, structured according to the United Nations Guiding Principles on Business and Human Rights (UNGPs) pillars of Protect, Respect, and Remedy. This systematic approach ensures that human rights considerations are embedded throughout organizational operations, decision-making processes, and stakeholder relationships.

1. Governance Structure and Policy Framework

Effective human rights management requires clear governance accountability and robust policy frameworks that translate commitments into operational reality. The Company has established multi-tiered governance structures with defined responsibilities for human rights oversight, risk management, and implementation:

1.1 Board-Level

The Audit and Risk Management Committee exercise strategic oversight of human rights matters, establishing policies, reviewing human rights risk exposure, and ensuring alignment with legal requirements and international standards. The Committee, comprising [at least three independent directors](#), provides independent governance oversight ensuring that human rights considerations receive appropriate board-level attention and that management's response to human rights risks operates effectively.

1.2 Management

Executive management translates board-level policies into operational programs, implementing measures that promote human rights respect, monitoring compliance with human rights standards, and preventing violations through proactive risk identification and mitigation. Management coordinates across functions and business units to ensure consistent human rights practices and maintains accountability for human rights performance within operational domains.

The Company has developed and published a Human Rights Policy addressing human rights principles, labor rights, working conditions, and stakeholder responsibilities. This policy, publicly available on the Company website including;

Human Rights Policy :

<https://www.civilengineering.co.th/storage/content/cg/document-download/20230612-civil-human-rights-policy-en.pdf>

The Company's Code of Conduct :

<https://www.civilengineering.co.th/storage/content/cg/document-download/20200810-civil-code-of-conduct-ethics-th.pdf>

Supplier Code of Conduct :

<https://www.civilengineering.co.th/storage/content/cg/document-download/charter/civil-supplier-code-for-conduct-en.pdf>

Privacy Policy :

<https://www.civilengineering.co.th/storage/content/cg/document-download/20220517-civil-privacy-policy-th.pdf>

Whistleblowing Policy :

<https://www.civilengineering.co.th/storage/content/cg/document-download/20240531-civil-it-whistleblowing-policy-th.pdf>

2. Human Rights Due Diligence Process

The Company conducts systematic [human rights due diligence](#) following UNDP methodology through four steps: risk identification and assessment, mitigation measures, monitoring, and communication. This process covers internal and external stakeholders across the value chain.

The HRDD process considers both internal stakeholders (employees, contractors) and external stakeholders (communities, customers, suppliers) who may experience direct or indirect impacts from Company activities throughout the value chain. Through collaboration with external experts, the Company has identified priority human rights risks specific to Thailand's construction industry:

- 1. Occupational Health and Safety of Employees*
- 2. Welfare and Social Security Provision for Workers*
- 3. Community Occupational Health and Safety*

Recognizing that vulnerable groups including workers at construction sites face heightened risks from identified human rights issues, the Company has joined [the Building Social Impact Initiative network](#) in partnership with the Home and Community for Children Foundation. This collaborative program addresses protection and welfare needs through four integrated pillars:

- **Infrastructure** - Ensuring safe, adequate living environments meeting minimum standards for accommodation, sanitation, and physical infrastructure at construction sites.

- **Welfare and Service Access** - Facilitating worker access to healthcare, childcare, financial services, and social support systems that enhance wellbeing and security.
- **Basic Health** - Providing health education, preventive care, nutrition support, and access to medical services for workers and families.
- **Educational Support** - Ensuring children of construction workers maintain educational continuity through provision of learning facilities, materials, and programs at or near construction sites.

The Company launched this initiative through a pilot project with key business partners at the Bangkok-Nong Khai High-Speed Rail Project, Contract 4-7 (Saraburi-Kaeng Khoi section), demonstrating commitment to practical implementation and testing of approaches before broader deployment. Based on lessons learned and success, the program will expand to additional construction projects in subsequent years, progressively extending protection and support to more vulnerable populations across Company operations.

3. Communication and Capacity Development

The Company implements comprehensive training and communication programs to build human rights awareness and capability across all organizational levels and extend understanding to business partners and stakeholders through new employee orientation and annual business ethics training under the program "CIVIL's Blueprint: Values, Beliefs, Code of Conduct, and Guidelines for Our Shared Future." Training methodology incorporates adult learning principles through real-world examples drawn from construction industry contexts, interactive scenario simulations requiring participants to apply human rights principles to realistic situations, and knowledge assessments verifying comprehension and retention. The Company maintains a rigorous 80% passing thresholds for all assessments. This approach ensures genuine comprehension rather than mere completion, building organizational capability to recognize and respond appropriately to human rights concerns.

In addition, the Company provides enhanced human rights education through partnership with [the Baan Dek Foundation](#), a specialized organization working on children's rights and migrant worker protections in Thailand's construction sector. This expert-delivered training reaches multiple audience levels including executive managers, project manager operational employees and our business partners. Training content addresses fundamental human rights principles applicable to construction operations, critical importance of systematic human rights risk management, practical approaches to preventing and avoiding violations in construction contexts, and specific considerations for protecting children's rights where children may be present at or near construction sites. This specialized training complements internal programs by providing external expertise, industry-specific insights, and stakeholder perspectives that deepen organizational understanding and strengthen implementation capabilities.

4. Grievance Mechanism

The Company has established accessible, transparent, and rights-compatible [grievance mechanisms](#) enabling stakeholders to raise human rights concerns and seek remediation for actual or potential violations. These mechanisms operate according to the effectiveness criteria outlined in the UN Guiding Principles on Business and Human Rights, ensuring legitimacy, accessibility, predictability, equitability, transparency, and compatibility with rights throughout grievance handling and resolution processes.

The Company provides multiple confidential channels through which internal and external stakeholders may report human rights concerns or violations. Reporting mechanisms are designed to be accessible to all potentially affected groups, including employees, contractors, community members, and other stakeholders, regardless of language, literacy level, or location.

Whistleblowing channel

1

Postal correspondence

- Address to Chairman of Audit Committee, Civil Engineering PLC.
No. 68/12 C.E.C. Building, 7th floor, Ladyao Chatuchak, Bangkok 10900

2

Email

- info@civilengineering.co.th

3

Website

- <https://www.civilengineering.co.th/th>

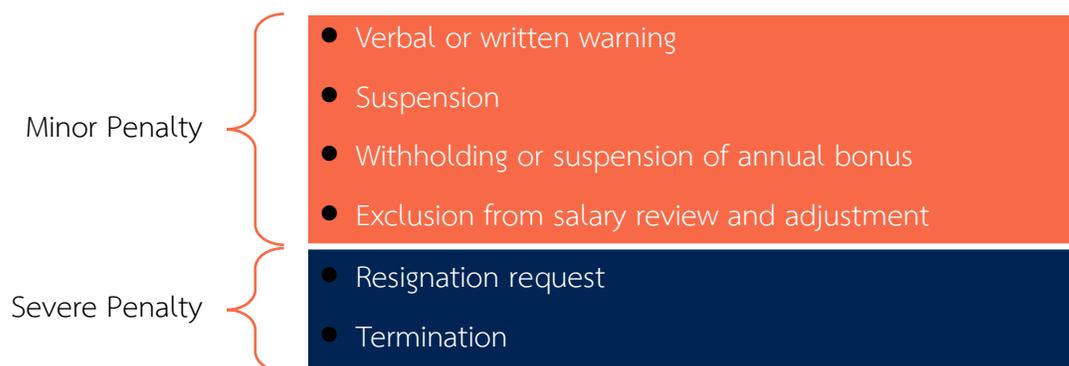
4

Tel.

- 0-2589-8888-9 Fax : 0-2589-8886-7

The Company regularly evaluates grievance mechanism effectiveness through analysis of complaint trends, processing times, resolution outcomes, and stakeholder feedback. Findings inform continuous improvement of mechanism design, accessibility, and performance, ensuring that grievance systems remain effective tools for human rights protection and organizational learning.

Penalties



Where investigations confirm human rights violations, the Company implements disciplinary actions proportionate to violation severity and individual responsibility. Disciplinary

measures range from formal warnings and mandatory training to suspension or employment termination, determined based on violation nature, severity of impacts, intent, and prior conduct history. The Company maintains flexibility to impose penalties commensurate with violation seriousness without necessarily following sequential escalation, ensuring that serious violations receive appropriately serious consequences including immediate termination where warranted.

Remediation

The Company is committed to providing effective remedy to individuals and groups adversely impacted by Company operations or business relationships. Remediation approaches are developed through consultation with affected parties and may take multiple forms:

1. *Monetary Compensation* - Financial payments addressing economic losses, medical expenses, lost wages, or other quantifiable harm. Compensation amounts are determined through good-faith negotiation between the Company and affected parties, considering actual damages, relevant precedents, and equitable resolution principles, consistent with Company policies and applicable legal frameworks.

2. *Non-Monetary Remediation* - Measures addressing non-financial dimensions of harm including formal apologies acknowledging wrongdoing and impact, psychological support and counseling services for individuals experiencing trauma or distress, medical treatment and rehabilitation for health impacts, immediate cessation of harmful practices or conditions, implementation of safeguards preventing continuation or recurrence, and restoration of rights or opportunities that were compromised.

Remediation processes incorporate meaningful consultation with affected parties throughout remedy design and implementation, ensuring that solutions address actual needs and priorities of those harmed rather than reflecting solely Company preferences or convenience. The Company provides accessible information about potential remedies, supports affected parties in understanding options and implications, ensures genuine opportunity for

affected parties to participate in remedy negotiations, and maintains transparency regarding remedy status and outcomes.

Beyond individual remediation, the Company conducts root cause analysis to identify systemic factors contributing to violations and implements corrective actions addressing underlying weaknesses in systems, processes, training, or oversight that enabled violations to occur. This preventive approach reduces recurrence risks and strengthens overall human rights performance.