

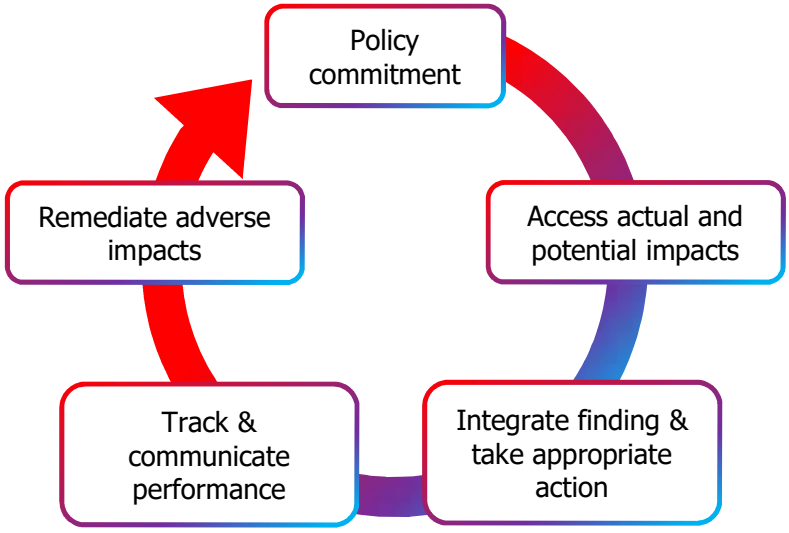
Human Rights Due Diligence Report 2025

Human Rights

True, as a telecom-technology company, apart from delivering quality products and services to consumers, is to promote equal opportunities for access to information, content, and ICT services. In doing so, the Company must conduct business with ethics and moral principles, recognizing the dignity and value of every human being. True operates with respect for human rights of all stakeholders. Reflecting the Company's policy on equal opportunities, True strive to achieve diversity in the workplace with measures to ensure equal treatment and human rights protection, regardlessof gender, age, education, nationality, ethnicity, skin color, religion, sexual identity and disability status.

Human Rights Due Diligence Process

True's Human Rights Due Diligence process is an on-going process. The Company does a systematic periodic review of the risk mapping of potential and actual human rights issues, every 2 years. The Due Diligence process applies to all of True's business activities and associated activities (e.g. network operations, office activities) within the value chain, where potential human rights impacts and/or risks may exist. The scope of assessment includes our own operations and extends to our business partners, suppliers and contractors, and new business relations (i.e. joint ventures, mergers and acquisitions).



Reference: UN Guiding Principles on Business and Human Rights

1. Policy commitment

Through True's Human Rights Policy, the Company commits to adhere to human rights principles in accordance with international standards which are the United Nations Universal Declaration of Human Rights (UNDHR), the United Nations' Guiding Principles on Business and Human Rights (UNGP), United Nations Global Compact, Organization for Economic Cooperation and Development (OECD), and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The policy expects that all relevant stakeholders of True comply with its human rights commitments; the scope covers its own operations, suppliers, contractors, business partners and extending the coverage to business relations i.e. joint ventures, mergers and acquisitions.

True is committed to preventing all forms of illegal labor practices (such as human trafficking, child labor, forced labor), discrimination, and harassment. Additionally, True is dedicated to respecting and promoting equal remuneration, diversity, freedom of association, the right to collective bargaining, and the respect of other rights, including employee health and safety, working conditions, community health and safety, standard of living, cybersecurity, and data privacy of stakeholders.

Moreover, True has implemented a system to track, monitor and assess human rights risks as well as ensuring that all stakeholders have access to our whistleblowing and complaint channels. These processes will provide us with feedback and input for further improvement of our due diligence process, and for our reporting of human rights performances.

2. Assess actual and potential impacts

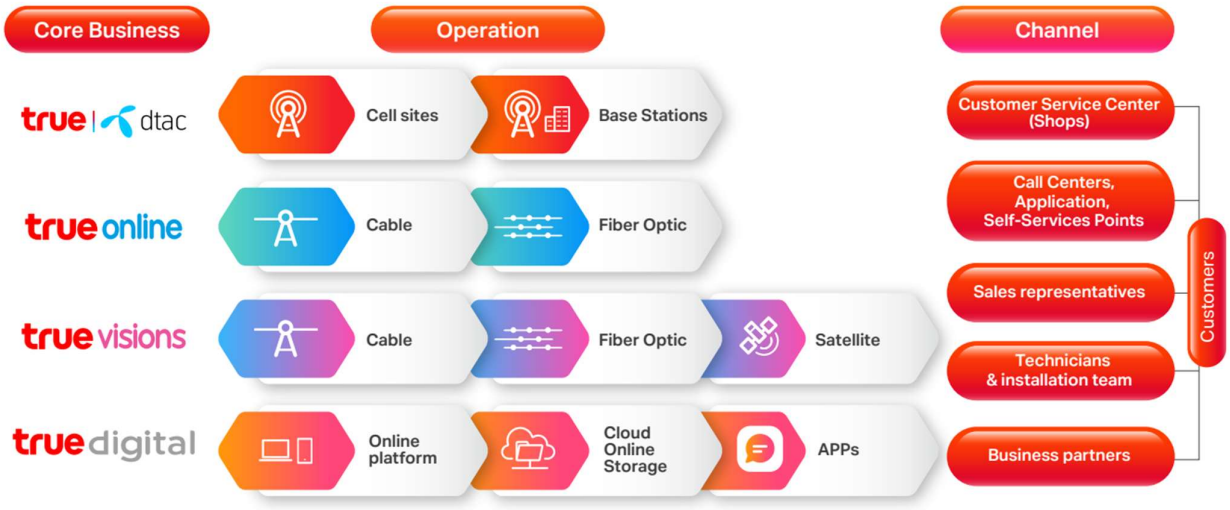
True has assigned a third-party consulting company to evaluate Human Rights due diligence and risk assessment processes covering 100% of our own operations and relevant stakeholders throughout the value chains, including vulnerable groups that are at risk of being impacted by our operations.

Human Rights Risk Assessment

As an on-going risk management process, True executes the human rights due diligence process to identify, prevent, mitigate and account for how the companyaddresses its adverse human rights impacts and risks from its activities and businessrelationships throughout value chain. As part of the process, True conducted human rights risk assessment, which covered 100% the company's operations subsidiaries and relevant stakeholders throughout value chain – both internal (e.g. employees) and external stakeholders (e.g. suppliers, contractors, communities, customers and business relations including joint ventures, mergers, and acquisitions), as well as vulnerable groups (i.e. women, pregnant women, children, indigenous people, migrant labor, third-party contracted labor Local Community, LGBTQI+, and elderly) – that may be or have been impacted by its activities.

The Human Rights risk assessment covers actual and potential human rights issues relating to forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, equal remuneration, discrimination and other rights including employee health and safety, working conditions, community health and safety and standard of living, cybersecurity and data privacy.

Scope of True Human Rights Risks Assessment: True Value Chain



Methodology

Our human rights risk assessment process includes the steps as follows:

1. **Identification of Human Rights Issues**:

    a. Identifying all relevant human rights issues related to True's business activities in the value chain.

    b. Identifying affected rights holders (e.g. employees, communities, customers) and vulnerable groups (i.e. women, pregnant women, children, indigenous people, migrant labor, third-party contracted labor, local community, LGBTQI+, and elderly)

Through screening of human rights issues that are relevant to True's business activities and value chain, we reviewed peer benchmarking of similar industries/sectors and various international benchmarking resources. The scope of relevant human rights issues for True's in 2025/2026, as shown below:

Employees Rights	Community Rights	Customers Rights	Suppliers Rights
• Discrimination and harassment • Employee data privacy (cybersecurity and data protection) • Freedom of association and collective bargaining • Freedom of expression • Working conditions • Occupational health and safety • Living wage • Illegal forms of labour	• Land acquisition • Community health and safety • Standards of living and quality of life • Selecting and presenting appropriate and non-harmful content	• Network reliability • Customer premises equipment safety • Safety in retail shops • Discrimination • Access to internet services • Unintended subscription to value-added services (SMS) causing unexpected charges • Transparency, accuracy, and clarity in communication • Customer data privacy • Online safety for children and youth • Network scammer	• Discrimination and harassment • Supplier data privacy (cybersecurity and data protection) • Freedom of association and collective bargaining • Freedom of expression • Working conditions • Occupational health and safety • Illegal forms of labour

2. **Risk Rating:** our risks ratings consider the criteria scale of severity and likelihood (see below for more information).

    a. Inherent Risk Rating: are human rights risks that did not take into consideration any existing measures or controls True's may have.

    b. Residual Risk Rating: are human right risks after considering the existing measures and controls. High residual risks are considered human rights salient issues, in which require implementation of additional measures.

Human Rights Risks Assessment Matrix

The assessment of human rights risk level will be conducted using a matrix below to determine the significance of the human rights, where the Axis-X is the level of likelihood and Axis-Y is the level of severity.

Severity	Rare	Unlikely	Possible	Likely	Almost Certain
Critical	High	High	High	High	High
Serious	Medium	Medium	Medium	High	High
Moderate	Low	Low	Medium	Medium	Medium
Minor	Insignificant	Low	Low	Low	Low
Insignificant	Insignificant	Insignificant	Insignificant	Low	Low

Likelihood

Remarks: Residual risks levels "High" are considered key risks that True needs to understand the effectiveness of its existing controls.

Risk Rating Definition

Level	Description	Management's Action
High	The loss, injury, damage, disadvantage, or anything that has a **severe effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **high-priority attention and remedy and need Board's approval.**
Medium	The loss, injury, damage, disadvantage, or anything that has a **moderate effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **attention and keep Board informed.**
Low	The loss, injury, damage, disadvantage, or anything that has a **minimal effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **attention and continuous monitoring**.
Insignificant	The loss, injury, damage, disadvantage, or anything that has **no important effect** on organizational objectives, operations, reputation, assets or individuals.	Requires management's **continuous monitoring**.

Determining Severity (Y-Axis)

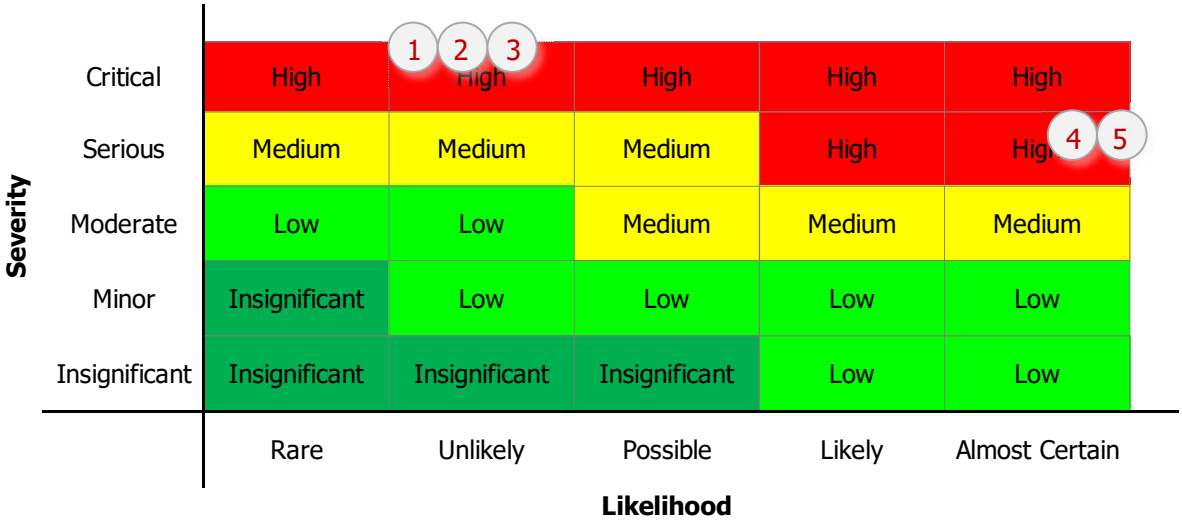
Severity			
Severity Level	**Scale** *(seriousness of impact)*	**Scope** *(how many people are or will be affected)*	**Irremediable Nature/Remediability** *(difficulty to restore the people impacted to a situation before impact)*
Critical (5)	Significant impact to health and safety: fatality	Impact to all stakeholders in the group (People, Customer, Partner, Social&Enviroment)	Impossible to restore or will take longer than 5 years (>60 months) to restore the impact
Serious (4)	Moderate impact to health and safety: serious injury that needs rehabilitation (loss time injury)	Impact to most stakeholders in particular stakeholder group (3of4 Groups) (People, Customer, Partner, Social&Enviroment)	Take between 3 to 5 years (36-60 months) to restore the impact
Moderate (3)	Slight impact to health and safety: minor injury or illness (loss time injury)	Impact to most stakeholders in particular stakeholder group (2of4 Groups) (People, Customer, Partner, Social&Enviroment)	Take between 1 to 3 years (12-36 months) to restore the impact
Minor (2)	Minor impact to health and safety: first aid case	Impact to some stakeholders in particular stakeholder group (1of4 group) (People, Customer, Partner, Social&Enviroment)	Take between 0.5 to 1 year (1 year) to restore the impact
Insignificant (1)	NO impact to health and safety	No negative impact to stakeholder	Take less than 0.5 year (6 months) to restore the impact

Determining Likelihood (X-Axis)

Likelihood			
Level	**Description**	**Frequency**	**Probability**
Almost Certain	Could happen frequently. Continuously experienced. (Very likely to occur)	Regular occurrence Circumstances frequently encountered - daily/weekly/monthly	91–100%
Likely	Could happen often. Occurs frequently. (Likely to occur)	Circumstances occasionally encountered (few times a year)	61–90%
Possible	Could happen occasionally. Occurs occasionally, or several times in a service life. (May occur about half of the time)	Likely to happen at some point within the next 1-2 yrs	41–60%
Unlikely	Could happen but rare. Remote chance of occurrence; unlikely, but can reasonably be expected to occur. (Unlikely to occur)	Only likely to happen 3 or more years	11–40%
Rare	Remote possibility. Occurs only very rarely. Unlikely but possible. (Very unlikely to occur)	Has happened rarely / never happened before	0–10%

3. Integrate finding and take appropriate action

Results of Human Rights Risk Assessment



Human Rights Salient Issues in True

- Online safety for children and youth internet fraud
- Online scams
- Health and safety of suppliers/Contractors
- Discrimination against vulnerable customer groups
- Community health and safety

(More information in True Sustainability Report 2025, Page 39-40)

Percentage of Sites with Human Rights Risks and Mitigation Plan (True)

100%	of own operation sites were assessed (72 Operation Sites)
22.2%	of activities (16 Sites) in own value chain operation sites with human rights risk
100%	of all high risk activities with mitigation plan and remediation process implement

Percentage of suppliers with Human Rights Risks and Mitigation Plan (Tier 1 Supplier)

100%	of total Tier 1 supplier with were assessed (1,384 Tier 1 in 98 product categories)
1.88%	of Tier 1 supplier (26 Sites) was found to be at human rights risk.
100%	of Tier 1 supplier with human rights risks and with mitigation plan and remediation process implemented

Percentage of Joint ventures with Human Rights Risks and Mitigation Plan (all joint ventures not included in Own Operations)

100%	of Joint ventures portfolios were assessed (5 number of investment portfolios)
0%	of Joint ventures portfolios with human rights risk
100%	of all high risk activities with mitigation plan and remediation process implemented

Mitigation Measures

SALIENT ISSUE	IMPACTED ENTITY	MITIGATION	PERFORMANCE RESULTS
1. Discrimination: Inaccessibility of digital applications for persons with disabilities	• Customer	• Developing inclusive apps for customers with disabilities, featuring screen reader compatibility and voice-support functions. These enhancements enable users to access information and perform transactions independently, conveniently, and safely.	• The True App features functions that assist people with hearing impairments and allows them to contact the Customer Service Center via video call (Video Chat) free of charge, with no service fees.
2. Online Safety for Children and Youth: Exposure to violent, pornographic, or gambling content due to insufficient digital filtering systems	• Customer	• Developing online safety curricula and activities to equip youth against digital risks and threats. • Partnering with government and key organizations to integrate national safe internet standards	• 12,072 students trained in the 'Digital Literacy & Online Safety' program
3. Online Scams, Fraudulent SMS and call center activities designed to solicit personal information or financial assets	• Customer	• True CyberSafe: A free, AI-powered intelligent threat prevention system integrated into True and dtac networks. It provides 24/7 automated detection and alerts, leveraging a database of over 100,000 risky URLs to block suspicious links and websites. The system also filters scam calls and SMS in collaboration with Cyber Police, supported by the 9777 Hotline for reporting and blocking fraudulent numbers.	• 3.2 million phishing links automatically blocked
4. Health and Safety of Suppliers/Contractors (e.g., installation of telecommunications towers or communication lines): Inadequate safety standards or insufficient personal protective equipment (PPE) may lead to serious accidents, including fatalities	• Supplier/ Contractor	• Enforce the Supplier and Business Partner Code of Conduct and verify compliance through audits by the Company and internationally accredited bodies. • Provide contractor safety training and Train-the-Trainer programs, covering prequalification requirements, hazard control (JSA), working at height, electrical safety, and LOTO procedures. • Implement safety action plans with strong leadership involvement, focusing on four areas: safety leadership and accountability, capability development, governance and safety management systems, and safety communication. • Conduct random on-site inspections to ensure compliance with safety standards, particularly in high-risk operations such as broadband services.	• Zero fatalities among suppliers and contractors from work-related incidents (0 cases) • 100% reporting of serious incidents within the Company's specified timeframe, including root cause identification and preventive measures to avoid recurrence • 100% ESG audits of suppliers in alignment with the BPM/DJSI framework, with findings used to establish preventive and mitigation measures for the following year

SALIENT ISSUE	IMPACTED ENTITY	MITIGATION	PERFORMANCE RESULTS
5. Health and Safety of Local Communities (Disorganized or sagging overhead cables on utility poles. These hazards can cause accidents for motorcyclists and pedestrians, leading to physical injuries and property damage.)	• Local Community	• Establish policies to control high-risk areas around telecommunications towers and distribution lines, restricting community access to hazardous zones to ensure safety. • Implement plans to expand the underground installation of communication cables in both Bangkok and other provinces. • Replace nationwide drop wires with new installations that comply with electrical safety standards. • Conduct regular inspections of drop wires every 3–6 months. • Provide accessible grievance channels for community members through company staff, website, email, and call center. • Promote community awareness by providing accurate information, ensuring a shared understanding that telecommunications towers do not emit harmful radiation affecting public health.	• Zero incidents of cable-related public injuries

4. Track and communicate performance

In addition to the continous review of human rights due diligence process and reporting of human rights performances, True has also been constantly tracking any cases of violations in which our operations may have to our stakeholders. To do so, we have implemented various comunication channels that are easily access and always reachable by all stakeholders, to ensure that any violations that may exists are thoroughly mitigate and to provide appropiate remediation in the case of actual violations.

Communication channels detailed as follows: Internal Communications, True Connect Application, True Care Center Chatbot, Sustainability Report, Annual Report, True official Web site.

In addition, anyone can raise any questions or concerns regarding our human rights practices or violations, via:

- Email Address : auditcommittee@truecorp.co.th;
- Company Website: https://truesustainability.info/sustainability/en/

5. Remediate adverse impacts

True organized a workshop on the Human Rights Due Diligence Process 2025/2026, which is regularly every two years. In addition, the Company conducts an annual review of human rights risk issues with preparing risk prevention and mitigation measures, providing reasonable remedies (both finance and non finance). With the collaboration of all departments within True and our joint ventures, and representatives of suppliers and contractors, the review covered 100% of True's operations and value chain.

We have set up complaint channels in each operation designed especially for emergency use and crisis. We have also defined procedures to ensure that affected individuals have immediate access to remedy.

Affected individuals can submit complaints through complaint centers set up in each operation, or through True's Call Center. True will then investigate the root cause of the complaint, and then implement mitigation and protection measures.

In the event that we cannot conclude the incident during the prevention and remediation process, True will establish protection and remediation measures through working with the external stakeholders such as local administrations, community leaders, and relevant government agencies in order to manage the complaints to meet all parties' expectations.