



**True Corporation Public Company Limited**  
18 True Tower, Ratchadaphisek Road, Bangkok10310, Thailand

# HUMAN RIGHTS POLICY

**POLICY APPROVED BY THE BOARD OF DIRECTORS**

**POLICY OWNER: CHIEF CORPORATE AFFAIRS OFFICER AND CHIEF HUMAN RESOURCE OFFICER**

**POLICY EFFECTIVE DATE: 3 FEBRUARY 2024**

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## 1. PURPOSE AND SCOPE

### 1.1 Purpose

This Policy sets out how True Corporation Public Company Limited and subsidiaries ("True" or "the Company") demonstrate our commitment to sustainable business conduct that encompasses economic, social, and environmental aspects. The Company places importance on respecting human rights and prevention of adverse impacts from violations of the rights on employees and all stakeholder groups. This represents a fundamental work ethic and a principle of harmonious coexistence. The Company is fully committed to maintaining a zero-tolerance policy for discrimination and human rights violations in all aspects of our organization, fostering an inclusive and equitable environment for all.

True upholds and respects human rights as reflected in domestic and international laws, rules and regulations. The Company fully adheres to the United Nations Universal Declaration of Human Rights (UNDHR), the United Nations Guiding Principles on Business and Human Rights, the 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 is as per the following:

- International Labour Organization Convention No. 29: Forced Labour Convention
- International Labour Organization Convention No. 100: Equal Remuneration Convention
- International Labour Organization Convention No. 105: Abolition of Forced Labour Convention
- International Labour Organization Convention No. 138: Minimum Age Convention

- International Labour Organization Convention No. 182: Worst Forms of Child Labour Convention
- International Labour Organization Convention No. 187: Promotional Framework for Occupational Safety and Health Convention

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, living wage, community health and safety, standard of living, cybersecurity, freedom of expression, and data privacy of stakeholders.

## **1.2 SCOPE**

This policy applies to the Company's own operations, its subsidiaries, business partners, suppliers, and other parties directly linked to its business operations, products, or services. The Policy should also be promoted and disseminated for these stakeholders to comply with True's human rights commitment and apply it in their operations. The scope of the human rights policy also extends to customers, communities, and vulnerable groups, or groups at risk of human rights violations (such as women, pregnant women, children, indigenous people, migrant labor, third-party contracted labor, LGBTQI+ individuals, the elderly, etc.) that link directly and indirectly with our business operations.

## **2. GOVERNANCE**

**2.1 Board of Directors** holds an oversight of the implementation of this Policy. They shall provide overall directions and support to the management to promote the Company's efforts in human rights respect.

**2.2 Management** shall review and sign-off the human rights work, including assessments, corrective actions, reporting, promotion activities, etc. It shall establish and oversee the organizational structure and policies to lead the group operations levels to ensure human rights respect embedding in business operations and that potential risks in human rights violations shall be mitigated.

## **3. COMMITMENT**

True incorporates work moral principles and ethics as parts of its Code of Conduct, ensuring that its business operations and the way its employees work and how to treat stakeholders are based on the principles of respecting each other's dignity and equity. To demonstrate the commitment to all employees and stakeholders for fair treatment, protection, and equal and

respect for fundamental rights, the Company has established key policies and management principles in various aspects as per the following:

- Code of Conduct
- Business Partner Code of Conduct
- Sustainability Policy
- Environmental Policy
- Employment and Labor Management Policy
- Whistleblower and Investigation Policy
- Procurement Policy
- Business Partner Management Policy

### **3.1 Labor Rights**

The Company shall treat employees fairly, embrace diversity, and value the differences among individuals. True prohibits discrimination against any employee or job applicant based on age, physical or mental disability, ethnicity, gender (e.g. LGBTQI+), color, religion, beliefs, country of origin, citizenship status, sexual orientation, or marital status. True also supports local employment and under-privileged groups. Everyone is to be treated with dignity and complete respect for their private lives, living wage and with respect to freedom of expression and association. The Company supports various measures aimed at eliminating forced or involuntary labor, child labor as well as excessive working hours.

### **3.2 Customers' Rights**

The Company places a high importance on customers' privacy and is committed to developing stringent data privacy and security standards, which are to be enforced across all forms of customer communications. This also includes implementing restricted internal controls concerning the protection and usage of such information.

### **3.3 Trade and Business Partners' Rights**

The Company offers products and services in compliance with international standards and advocates for transparency in the use of telecommunications technology worldwide. As a business partner, the Company maintains the highest levels of business ethics, respects personal dignity, and ensures that its business operations comply with various regulations when dealing with its trade and business partners. True has a sustainable procurement policy, which extends to trade and business partners, encouraging them to adopt it as a management guideline to prevent becoming involved in work processes that may lead to human rights violations. The Company supports respect for human rights and strictly abides by various human rights laws and regulations, ensuring that these principles are also upheld throughout the supply chain. Moreover, True encourages its trade and business partners to adopt ethical business practices with a sense of responsibility towards society and to foster a culture of mutual respect among each other. Furthermore, True promotes the continuous development of their competencies.

### **3.4 Community Rights and the Environment**

The Company is committed to its responsibilities towards the community, society, and the environment. True has an environmental policy that serves as a guideline to minimize the impact of the Company's business operations on the community, society, and the environment. True strictly and consistently adheres to laws, regulations, and requirements related to the environment in all its activities. The Company also has policies in place to engage with all stakeholder groups, emphasizing fair treatment and the rights of stakeholders. This is to ensure that there are no human rights violations among the Company's stakeholder groups.

### **3.5 Children's Rights**

The Company operates its business with respect and support for children's rights in the Workplace, Marketplace as well as Community and Environment, In addition, True encourages employee awareness and understanding of the rights of children and the importance of incorporating these policies as part of the overall business culture.

## **4. REQUIREMENTS**

### **4.1 Human Rights Due Diligence Process**

Human rights due diligence process shall be integrated in business activities with an aim to avoid causing or contributing to adverse impacts on people and society, and to seek to prevent adverse impacts directly linked to business operations, products or services through business relationships Human rights due diligence shall be conducted on a regular basis, and when material changes to the business environment occur, in own business operations and in the supply chain. It shall cover the rights areas and stakeholders that link directly and indirectly to our business operations in the due diligence process. The Company also regularly monitors and assesses risks and impacts on human rights throughout its operation lifecycle and activities related to its business, value chain, and new acquisitions. Additionally, it provides appropriate risk management guidelines or control measures, for which all business units are responsible to ensure that risk management is fully implemented within their respective areas of responsibility.

### **4.2 Diversity, Equity, and Inclusion in Workplace**

True shall ensure that its work environment fosters diversity of ideas and welcomes people with various skills and experiences, as these factors are key drivers to sustainable business growth, ground-breaking innovation, and performance excellence. As such, the Company establishes a Diversity, Equity, and Inclusion (DE&I) guideline with an aim to mutually benefit its business operations and employees, as shown below.

- True is an equal opportunity employer and diversity is imperative to the way we do business.
- There shall be continuous focus in all employee-related processes to ensure diversity and inclusion and to minimize sources of bias.
- Fair representation of gender, nationality, age, abilities and LGBTQI+ within the total employee base.

#### **4.3 Non-Discrimination and Anti-Harassment in Workplace**

As an important part of the labor rights promotion at workplace, True shall prevent discrimination and harassment and set a guideline of practices in the processes of recruitment & selection, human resource development, performance evaluation, reward & compensation, and transfer & exit, as set out in the Employment and Labor Management Policy.

#### **4.4 Grievance Mechanisms**

True shall establish and implement a grievance mechanism for employees and stakeholders to raise concerns, report complaints, or identify adverse human rights impacts in cases of human rights violations. The Company shall set up a process to support resolving the investigated concerns to determine whether disciplinary or corrective actions are required.

### **5. TRAINING & COMMUNICATION**

True encourages proactive two-way communication among employees to enhance awareness, knowledge, and understanding of their role in respecting human rights. True shall ensure adequate communications and training for all employees of own operations and in the supply chain on human rights and salient issues, such as discrimination and harassment in the workplace.

### **6. REPORTING**

True shall provide periodic and event-based reporting of human rights related work and information to the management, relevant functions, and report to the Board of Directors on an annual basis. Human rights related information shall be publicly disclosed in its annual sustainability reporting and other channels.

### **7. DEFINITIONS**

- **Subsidiaries**

Companies in which True holds more than 50 percent of their shares and has management control.

- **Employees**

All employees who work under an employment contract with True in all positions

- **Business Partners**

Individuals, groups, or organizations who are in the following relationships with True:

- Distributors and franchises
- Agents, intermediaries, and lobbyists
- Recipients of sponsorships, donations, and other contributions
- Partners with digital or online business models involving revenue, platforms or other sharing arrangements
- Merger and acquisition, joint venture and divestment partners

- **Suppliers**

Individuals, groups, or organizations that supply or sell their products and services to the Company, including any manufacturers, contractors, consultants, and service providers.

- **Discrimination**

Any different treatment or discrimination or special treatment to an individual or group of people based on personal characteristics on race, nationality, color, ethnic, religion, social status, gender, age, physical features or disability, political belief including marital status.

- **Harassment**

Behaviors which are considered unwelcome, offensive, discriminated against, threatening and hostile (by the harassed employee) which unreasonably disrupts another person in his/her work. The behavior may not be intentionally done by harasser, but it has impact on the harassed employee's physically and mentally. This is considered non-sexual harassment.

- **Sexual Harassment**

Unwelcome, inappropriate, offensive behavior or advances of a sexual nature, including verbal, physical, or visual actions, that create a hostile or intimidating environment in the workplace or other settings.

- **Diversity**

The ways people differ, ranging from the apparent differences such as age, gender and physical appearances, to the unapparent differences such as thoughts, belief, values, preference and experience.

- **Equity**

Recognizing that people have different challenges and face different risks to human rights violation, simply treating everyone equally may not ensure an acceptable outcome. Instead, the organization should strive to achieve equity by recognizing such those different challenges and systemic imbalances, and work towards correcting those imbalances.

- **Inclusion**

Valuing differences while everyone in the organization is engaged and recognized.

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