

Human Rights Policy



Super Turtle Public Company Limited

19 March 2026

Human Rights Policy

Super Turtle Public Company Limited (the “**Company**”) commits to conduct the business by protecting the human rights of all stakeholders in the value chain. The Company will follow the international human rights laws and standards, including the Universal Declaration of Human Rights (UDHR); the ILO Declaration on Fundamental Principles and Rights at Work (ILO) and the UN Guiding Principles on Business and Human Rights (UNGPR). To ensure that the Company will not infringe human rights, the Company, therefore, issued this Human Rights Policy to serve as corporate standards on human rights management.

1. Scope

This Human Rights Policy applies to all business activities throughout the Company's operations as well as those of its business partners (including suppliers and sub-contractors), subsidiaries, and joint ventures. The Company expects all stakeholders to comply with this Human Rights Policy by integrating its principles into their own operations, thereby working collaboratively with the Company to maintain a responsible and ethical value chain.

2. Human Rights Definition

Human rights are the fundamental rights inherent to all human beings, regardless of the differences such as race, skin color, sex, language, political opinion or other opinions, national or social origin, property or any other status. These rights are universal and apply equally to everyone.

3. Human Rights Policy

- Respect and uphold human rights standards, ensuring no form of discrimination.
- Support and encourage all stakeholders to adhere to human rights standards.
- Communicate, publish, educate, and support all stakeholders to conduct business activities in compliance with human rights standards.

The Company’s human rights management focuses on four key areas: employees, communities and the environment, business partners, and customers.

(1) Employees

- The Company’s human resource policies and procedures align with international labor standards and human rights principles.
- Promote diversity and inclusion across all cultures, ensuring no unjustified discrimination occurs.
- Recruit employees based on competency, experience, skills, and qualifications relevant to the position, in accordance with the Company’s rules and regulations.
- Ensure fair working hours, wages, and benefits in compliance with applicable laws.
- Maintain a safe working environment and support the health and well-being of all employees.
- Provide employees with opportunities to exercise their rights to freedom of association and collective bargaining.

(2) Communities and Environment

- Conduct the Company’s operations with respect for surrounding communities and the environment across all projects.
- Comply with applicable laws and regulations to minimize any negative impact on the well-being of local communities.

(3) Business Partners

- The Company promotes adherence to human rights principles among all business partners, including suppliers and sub-contractors, by integrating these principles into all supply chain processes—from screening and selection to contract extension or termination. There is a supplier selection process to ensure that procurement and subcontracting processes are transparent, fair, and auditable. Human rights considerations assessed for suppliers and sub-contractors include, but are not limited to, fair working conditions, freedom from discrimination, and safe and healthy workplaces. These assessments help ensure equal opportunities and prevent illegal labor practices, such as child labor, slavery, forced labor, and exploitation of migrant workers.
- The Company will ensure business partners to identify potential human rights risks and implements mitigation measures when violations are detected. Penalties are established for partners who fail to comply with the Company’s human rights standards.

(4) Customers

The Company is committed to respecting and protecting customer rights, with a focus on personal health and safety, accessibility, and the privacy of customer information.

4. Reporting and Disclosure

The Company is committed to transparently reporting its human rights commitments and performance. Disclosures will be included in the Form 56-1 One report under the Business Driven for Sustainability section and on the Company’s website.

This policy is effective from 19 March 2026 onwards.