

noble

Human Rights Policy

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Human Rights Policy

Noble Development Public Company Limited emphasizes on the operation in accordance with corporate governance, realization of social responsibility, respect, and promotion of human rights under the international laws and principles. To ensure that the Company's business operation is free from human rights violations, the Board of Directors find it appropriate to establish the human rights policy and guidelines to prevent human rights violations in all processes of the Company business operation, as well as the management of business partner in business value chain and joint venture.

The Company has established the policy and guidelines related to the human rights in accordance with the international guidelines on human rights, including Universal Declaration of Human Rights (UDHR), The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and United Nations Guiding Principles on Business and Human Rights (UNGPs).

Definitions

Company means Noble Development Public Company Limited.

Human Rights means human dignity, basic rights and freedom granted since birth and equality that prevent a person from being discriminated based on race, religion, sex, skin color, language, ethnicity, or other status (Source: National Human Rights Commission of Thailand).

Objective

This human rights policy and guidelines has been established to prevent the violation of human rights in all processes of business operation of the Company, covering the Company's business operation that results directly and indirectly from the operation of the Company, subsidiaries, and joint ventures where under the Company control and encourage related business partners and stakeholder through the value chain, such as suppliers, customers, main contractors, subcontractors, and joint ventures to perform toward the same direction.

Scope

This policy is effective for directors, executives and employees of the Company, its subsidiaries, and joint ventures where under the Company control. The Company expects representatives who act on behalf of the Company including stakeholders to comply with this policy.

Roles and Responsibilities

The Board of Directors has the roles and responsibilities to supervise the business operation under the corporate governance, establishing the policy and guidelines related to human rights in accordance with the international guidelines on human rights. They are also responsible for being leaders who express the determination in working by strictly considering then human rights principles and fostering them to become part of corporate culture, including determining and approve the Company's human rights policy.

The Audit Committee has the roles and responsibilities to control and supervise the internal control system, review finance and accounting reporting system and internal audit system to ensure that all meet international standards and are concise, appropriate, update and efficient to ensure that the Company complies with this policy.

The Corporate Governance Committee has the roles and responsibilities to supervise and to ensure the compliance with the human rights policy. Therefore, the policy and guidelines are implemented completely and appropriately, including monitoring the effectiveness, due diligence and reviewing the policy and guidelines of this policy.

The Risk Management Committee has the roles and responsibilities to supervise risk assessment related to human rights violations in the Company's value chain, including supervising compliance with the risk management policy to prevent possible violation of human rights.

Chief Executive Officer and Executives have the role and responsibilities to establish efficient guidelines and working process to align with the direction of human rights policy in the supply chain, as well as setting communication and training program for personnel at all levels to ensure that they have sufficient understanding and are able to efficiently and effectively apply related policies and procedures in their operations. They also are responsible for reviewing the appropriateness of related procedures to align with any changes in business operations, procedures, regulations, and laws.

Internal Audit Group has the roles and responsibilities to audit and review for the operational accuracy, the compliance with the Company's policies, guidelines, and code of conduct, including related laws to ensure the Company has effective internal control system to prevent the risks of human rights violations that may occur. It has responsibilities to audit, review, and report to the Corporate Governance Committee, this includes performing duties assigned by the Audit Committee regards the investigation of human rights violations in relation to the Company, in addition to the annual audit plan and report to the Audit Committee at least once a year.

Human Resources Group has the roles and responsibilities to communicate, educate, promote, and develop knowledge continually, including responsible for arranging the assessment regards knowledge and understanding of human rights policy and related guidelines for directors, executives, and employees and report the result of communication including the assessment of knowledge and understanding of the policy to the Internal Audit Group to conduct an audit at least once a year.

All directors, executives, and employees have the roles and responsibilities to comprehend and act in accordance with the human rights policy and relevant procedures.

Human Rights Policy and Guidelines

The Company realizes the importance of human value and dignity, basic human rights, and places importance on respect for human rights in all activities. For this reason, the Company encourages all executives and employees of the Company to be aware of basic human rights under the Universal Declaration of Human Rights and creates the corporate value and culture that respects the human rights.

The Company places importance and treats employees fairly on the human rights basis respect by emphasizing and valuing diversity of employees under **be different, be noble** philosophy to which the Company always adhere. We have the personnel management policy and guidelines as required by the law which focuses on respectable and equitable treatment without discrimination based on race, religion, sex, language, age, skin color, and social status. The Company does not accept the child labor or forced labor but supporting legal foreign labor. The policy and guidelines have been implemented, promoted, supported, and improved continuously to ensure safe work environment and prevent impacts on the health of employees and relevant persons.

To enable directors, executives, and employees of the Company, subsidiaries, and joint ventures where under the Company control to realize the importance and respect human rights in all aspects of all people, societies and communities under the law, the following guidelines are implemented:

- Treat everyone equally on the human rights basis without discrimination
- Conduct business without affecting directly and indirectly on violation of human rights
- Support and respect human rights protection
- Provide measures to ensure that the Company business is not involved in violation of human rights
- Monitor, audit, and assess the risks and effects on human rights regularly and establish the plans or measures on risk management appropriately
- Communicate, disseminate, and give knowledge of international human rights principles to executives and employees of the Company, subsidiaries, and joint ventures where under the Company control

- Encourage relevant business partners and stakeholders through the value chain, such as suppliers, customers, main contractors, subcontractors, and joint ventures to be aware of the importance of human rights respect for sustainable business development
- Arrange the assessment process and identify the risks of human rights violations and effects to allow the Company to plan and determine the solutions to prevent human rights violations
- Provide complaint management system and effective retention of data, as well as developing the whistleblowing channels regarding human rights violations regularly

Assessment of Human Rights Risks and Impacts

To ensure that the Company's business is free from human rights violations and the business is operated on the UN Guiding Principles on Business and Human Rights (UNGPR) basis as well as the business context in Thailand with the aim of identifying human rights risks and prevent human rights violations or other negative impacts which may occur from the Company's business activities.

The Company will review the status to identify human rights risks of the Company and possible impacts on the Company and stakeholders regularly by managing and determining the measures of risk management promptly and appropriately. All relevant groups related to the Company's business activities, suppliers and business partners, and investment (merger, takeover, or joint venture) will be responsible for overseeing, inspecting the management and identifying impacts and/or possible human rights risks under their responsibility, especially employment process, to avoid involvement in human trafficking, employment discrimination, forced labor, and child labor, through the complete process of audit and human rights risk assessment conducted systematically on annual basis. This is to ensure that there will be information for consideration prior to a decision making to invest in relevant business and such consideration will cover all relevant stakeholders. Human rights issues to be considered during the complete process of audit and assessment will include the use of forced labor, child labor, rights and freedom of collective bargaining, appropriate remuneration, equality, discrimination, relocation, acquisition of lands, and human trafficking.

Internal Control and Audit

Internal control is part of creating reliability for human rights policy and guidelines established by the Company. Therefore, the plan for internal control and audit has been arranged to enable the Company to achieve the goals in doing business which conform with the human rights protection principles, as well as the national law and international guidelines as follows:

- Complete assessment of human rights risks and impacts occur actually or tend to occur as a result of the Company's activities, collaboration with Human Resource Group to consider people who are or tend to be affected by the human rights risks derived from work will be considered, and the Company will collaborate directly with the affected people such as employees, suppliers, partners, investors, local communities.
- The Company has announced the implementation of human rights policy and principle which conforms with human rights protection principle under the national law and international standard. It applies to all directors, executives and employees of the Company and the subsidiaries where under the Company control. The policy is also communicated to the public and internal and external stakeholders.
- When the Company has identified that it causes or partially causes the violation of human rights, remedies and corrective actions will be taken. Complaint filing system will also be established to allow stakeholders who may be affected by the Company's activities to ensure that the complaints will be promptly dealt with and direct remedies are given.
- For integration of the policy into the assessment and the internal and external control mechanisms, after the issues have been identified and prioritized, the Company will mitigate the problems by integrating the access of the Company's operation for each issue and through the provision of knowledge and training with tools and processes. The relevant human rights issues include labor and corporate governance. Working with the stakeholders will facilitate the development of the policies and processes.
- Follow-up and report of operating results will help the stakeholders, especially the investors, understand the reason why importance is given to human rights issues and who benefit from it. Report on the human rights risk assessment will also be publicized which reflects the business transparency.

Training and Internal Communication

The Company will provide knowledge and understanding regards human rights policy and guidelines, as well as raising awareness of social responsibility, and strict respect and promotion of human rights under the law and international principles.

Whistleblowing

The Company has established guideline and channels for complaints and whistleblowing to receive comments, suggestions or complaints for directors, executives and all employees including all stakeholders who are affected or are at risk to be affected by violation of human rights of the Company in order to improve the management process to be more concise and efficient.

Whistleblowing Channels

Directors, executives, employees, and all stakeholders can whistleblowing to Chairman of the Audit Committee via the following channels:

1. The Website at www.noblehome.com in section of "Investor Relations" topic "Whistleblowing and Corruption Issues"
2. Email: cg@noblehome.com
3. Information Center

To: Chairman of the Audit Committee

Address: Noble Development Public Company Limited (Head office)
1035, Noble Building, Ploenchit Road, Lumpini
Pathumwan, Bangkok 10330, Thailand.

Phone : 0-2251-9955 ext. 1500

Fax : 0-2251-9977

The Company encourages whistleblowers to reveal their identities and/or provide information and clear and sufficient evidence. In this regard, the Company will keep the information of whistleblowers confidential.

Remedy Measures

In case of impacts of human rights due to the business operation, the Company will provide full collaboration in any processes including remedies by considering fairness, transparency, and conformity under United Nations Guiding Principles on Business and Human Rights (UNGPs).

Release of Information to General Public

Disclosure of the Company's human rights policy is a part of the Sustainability Report Development Reporting through the Form 56-1 One Report and the Company's website or other appropriate channels of communication.

Policy Violation

Human rights policy is deemed a part of performance discipline, therefore, directors, executives or employees who fail to act in compliance with the policy will be investigated and considered disciplinary actions in accordance with the Company's regulations, charters, and relevant laws, which may include termination of employment.

Related Policies

Directors, executives, and employees are responsible for studying and understanding this policy together with other of the Company's policies and guidelines as follows:

1. Corporate Governance Policy
2. Code of Conduct
3. Human Rights Policy
4. Employee Regulations

Supervision, Monitoring and Review

The Company's Board of Director determines the monitoring and assessment of the policy and performance of human rights and the reporting of the assessment results to Board of Directors shall conduct annually.

This policy has been approved by the meetings of Corporate Governance Committee No.3/2021 held on November 1, 2021, and the Board of Directors No.7/2021 held on November 11, 2021.

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(Ms.Punnee Chaiyakul)
Chairwoman of the Board

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