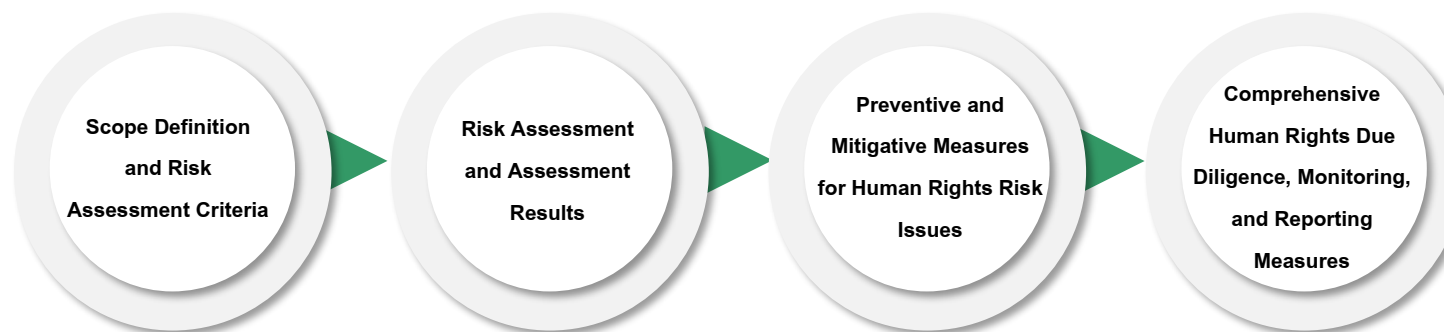




ABSOLUTE CLEAN ENERGY
PUBLIC COMPANY LIMITED

Human Rights Risk Assessment 2024

ACE conducts annual human rights risk assessments across the group's operations. This process aims to identify, prevent, and mitigate potential and actual human rights risks related to the company's business activities. The assessment involves the following steps:



1. Defining the Scope and Identifying Human Rights Risks

Human rights risk identification considers two main factors: likelihood of occurrence and severity of impact. The assessment covers a wide range of human rights topics and includes direct and indirect business partners as well as the broader business value chain. In 2024, the company completed human rights risk assessments at a total of 18 sites, comprising 14 biomass power plants, 1 natural gas power plant, 2 waste-to-energy power plants, and its head office. This ensures that the company is aware of potential human rights risks in all its operations and activities. Industry-specific and location-specific risks are also taken into account. The identified risks are then matched with affected stakeholders—employees, communities and the environment, business partners and contractors, and customers.

Key risks identified include: area-specific and environmental risks, forced labor, freedom of association and collective bargaining, discrimination, and all forms of abuse. Details are as follows:

1.1 Scope of the Human Rights Risk Assessment

Employees	Communities and Environment	Partners, Contractors, and Supply Chain	Customers
<ul style="list-style-type: none"> Discrimination on the basis of equality and rights Occupational health and safety Data privacy Working conditions Freedom of association and collective bargaining Illegal labor practices 	<ul style="list-style-type: none"> Community health and safety Standard of living Access to water and sanitation Land acquisition Environmental pollution (air, water, noise, etc.) 	<ul style="list-style-type: none"> Discrimination based on fairness, transparency, and equality Health and safety of partners Proper labor practices 	<ul style="list-style-type: none"> Discrimination Quality of customer service Privacy and data protection

1.2 Risk Assessment Criteria

Risk Level	Likelihood (frequency) (X)	Impact (Y)		
		Impact Level	Number of People Impacted	Remediation Capacity
4 (Very High)	More than once a month	Stakeholder fatality	Has a broad impact on stakeholders or extends beyond the scope of the operational area.	Unable to control or mitigate the human rights impact to restore normal conditions and/or requires more than 5 years for remediation.
3 (High)	6–12 times per year	Stakeholders who are permanently disabled, severely injured, or unable to work for more than 3 days.	Impacts multiple stakeholder groups (e.g., affects both customers and employees, etc.).	Capable of controlling or mitigating the human rights impact to restore normal conditions within a period of 1 to 5 years.
2 (Moderate)	2–3 times per year	Stakeholders who are injured and require medical treatment.	Impact on one stakeholder group (For example, it only affects some customers, business partners, communities, or employees.)	Capable of restoring affected stakeholders to normal conditions within a period of more than 3 months but less than 1 year.
1 (Low)	Once a year	Does not impact the health, hygiene, and safety of employees or stakeholders (basic first aid provided).	No significant stakeholder impact	Can control or mitigate the human rights impact to restore normal conditions within a period not exceeding 3 months.

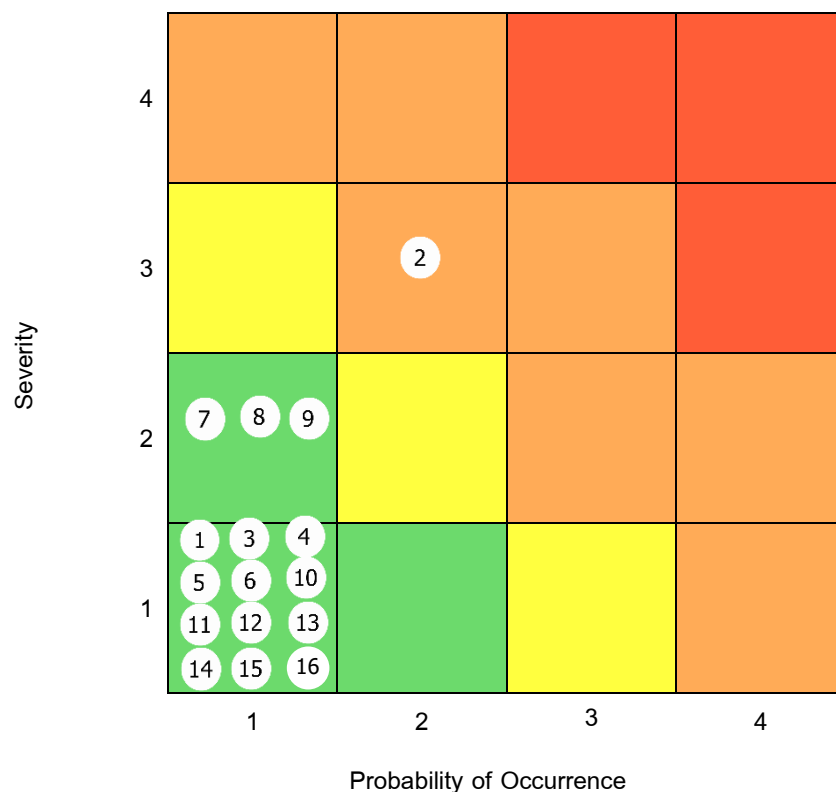
Low
 Moderate
 High
 Very High

2. Risk Assessment Results

	Percentage of operational areas assessed for human rights risks.	Percentage of operational areas identified with human rights risks.	Percentage of operational areas with human rights risks that have implemented mitigation, prevention, and remediation processes.
Total Operational Areas of the Company	100	4.31	100

The company has adhered to its human rights policy and continuously monitors compliance to ensure the effective respect and protection of human rights across the organization. In 2024, no human rights violations were reported in the company's operational areas (including business partners where the company has control over management).

The 2024 human rights risk assessment of all 18 company operational sites—including 14 biomass power plants, 1 natural gas power plant, 2 waste-to-energy power plants, and the head office—found that significant high risks (salient issues) related to employee health and safety persist at biomass power plants. The company has developed measures to manage and remediate key human rights risks related to its business operations, as outlined below.



Key Human Rights Issues Assessed		
Employee Rights	1	Employee Discrimination
	2	Employee Health and Safety
	3	Employee Data Privacy
	4	Working conditions
	5	Freedom of association and collective bargaining
	6	Illegal labor employment
Community and Environmental Rights	7	Community health and safety
	8	Standard of living
	9	Access to water and sanitation
	10	Land acquisition
Partner and Contractor Rights	11	Discrimination Against Business Partners
	12	Business Partner Health and Safety
	13	Illegal labor employment
Customer Rights	14	Discrimination Against Customers
	15	Service quality
	16	Customer Data Privacy

3. Preventive and Remedial Measures for Human Rights Risk Issues

Based on the human rights risk assessment results, the company has established control measures and mitigation strategies for potential impacts. Additionally, the company has assessed the residual risks after implementing human rights prevention and correction approaches in its business operations. This is to ensure that the company's human rights management is effective in controlling all impacts, with specific segregation according to the target groups identified in the scope of the assessment.

Topic	Risk Issues	Operational Measures for the Prevention and Mitigation of Human Rights Impacts
Employee Rights	<ol style="list-style-type: none"> 1. Discrimination Against Employees 2. Employee Health and Safety 3. Employee Data Privacy 4. Working Conditions 5. Freedom of Association and Collective Bargaining 6. Employment of Illegal Labor 	<ul style="list-style-type: none"> - Comply with the Human Rights Policy and the Labor Protection Act. - Convene the Occupational Safety, Health, and Working Environment Committee to ensure that safety measures align with relevant standards. - Implement the requirements of ISO 45001 and ISO 14001. - Provide annual health check-ups for employees based on occupational risk factors. - Adhere to the Personal Data Protection Policy. - Hold meetings of the Workplace Welfare Committee to gather employee feedback and develop beneficial welfare measures. - Provide safety training, including proper use of PPE, enforce PPE compliance within the factory, and impose penalties for non-compliance, alongside workplace rules and regulations. - Promote traffic discipline and ensure punctuality, particularly for employees working outside the factory premises.
Community and Environmental Rights	<ol style="list-style-type: none"> 1. Community Health and Safety 2. Community Living Standards 3. Access to Water and Sanitation 4. Land Acquisition 	<ul style="list-style-type: none"> - Comply with the conditions set forth in the electrical business license and the industrial operation license strictly. - Adhere to the Code of Practice (CoP) and ensure regular monitoring and environmental quality measurements in accordance with legal requirements. - Strictly follow the ISO 45001 and ISO 14001 standards. - Develop emergency response plans and conduct drills in collaboration with the local community. - Study water sources prior to initiating operations and design raw water reservoirs to ensure adequate supply for the power plant throughout the year. - Obtain proper authorization for water use or withdrawal from public water sources, and comply with the stipulated regulations regarding the timing and volume of extraction.

Topic	Risk Issues	Operational Measures for the Prevention and Mitigation of Human Rights Impacts
		<ul style="list-style-type: none"> - Adjust the operating hours of machinery, such as the chute bowl, to minimize disruption to the local community. - Manage odors from fuel stockpiles by covering the piles and ensuring that stock is kept for no longer than one month. - Evaluate legal issues prior to land acquisition and conduct public hearings before commencing operations, providing clear communication about the operational steps to the community. Additionally, ensure that there is no coercion, expropriation, or exploitation of landowners in the community.
Rights of Business Partners and Contractors, Business Allies, and Supply Chain.	<ol style="list-style-type: none"> 1. Discrimination against Business Partners 2. Health and Safety of Business Partners 3. Employment of Illegal Labor 	<ul style="list-style-type: none"> - Establish criteria for selecting business partners and procurement procedures in accordance with operational guidelines. - Provide training for business partners before entering the plant area to ensure safe work practices within the power plant. - Set employment conditions requiring business partners to comply with the power plant's regulations, including the issuance of Work Permits, adherence to ISO 45001, ISO 14001, and the Code of Practice (CoP) strictly. - Implement self-assessment by business partners regarding licenses and health requirements, particularly for high-risk tasks such as Boiler operations. - Set measures for the sale of products within the plant, such as requiring delivery vehicles to have metal barriers behind the glass to prevent accidents.
Customer Rights	<ol style="list-style-type: none"> 1. Non-Discrimination in Customer Treatment 2. Quality and Fairness in Customer Service 3. Customer Privacy and Data Protection 	<ul style="list-style-type: none"> - Provide training to employees to ensure equal treatment of all customers, ensuring that they are not discriminated against, in accordance with the business responsibility policy to respect human rights. - Implement a transparent and accessible complaint handling system, with procedures for investigating, resolving, and monitoring complaints. - Establish a customer screening process in compliance with legal requirements. - Conduct customer satisfaction surveys. - Adhere to the policy on the protection of personal data.

4. Comprehensive Human Rights Due Diligence, Monitoring, and Reporting Process

- 1) Announce the human rights policy or commitment to ensure that all executives, employees, and relevant stakeholders are informed.
- 2) Assess human rights risks and impacts, including identifying individuals who may be affected, covering employees, communities, the environment, business partners, contractors, and customers.
- 3) Integrate the assessment results into internal management by developing risk management plans after completing the risk assessment. These plans will utilize standards and guidelines, such as the Code of Practice (CoP), security, safety, occupational health, and environmental management systems, to reduce or control potential impacts.
- 4) Monitor the effectiveness of the actions by setting appropriate timelines for follow-up and evaluation for each plan, including conducting audits to ensure the effectiveness of the management process.
- 5) Communicate and disclose the results of the actions and the outcomes of the management efforts to relevant stakeholders.
- 6) Address and remedy any impacts through a complaint mechanism when the company identifies or acknowledges its role in causing or contributing to negative human rights impacts. The company will take corrective actions to prevent further violations, providing a summary and reporting on the follow-up outcomes.