ABSOLUTE CLEAN ENERGY PUBLIC COMPANY LIMITED

Human Rights Risk Assessment 2025

Human Rights Due Diligence (HRDD)

The objective of Human Rights Due Diligence (HRDD) is to enable the ACE Group to understand the status of its operations across all stakeholders throughout the entire value chain, including communities, business partners, and customers. This process supports the identification, prevention, mitigation, and remediation of actual and potential human rights risks and impacts arising from business activities.

Accordingly, the Group has established a Human Rights Due Diligence framework comprising the following components: the establishment of a Human Rights Policy, human rights risk and impact assessment, the development of risk prevention and control measures, ongoing monitoring and reporting, and the establishment of grievance mechanisms and remediation processes.

Human Rights Due Diligence (HRDD) Process

Human Rights Risk Assessment (HRRA)

As part of its HRDD process, the Group conducted a Human Rights Risk Assessment (HRRA) to identify and evaluate potential human rights risks arising from its business activities, including those associated with both direct and indirect business partners. The assessment covers all business operations across the Group, comprising 33 sites: 13 biomass power plants, 1 natural gas power plant, 2 waste-to-energy power plants, and 15 ground-mounted solar power plants, as well as 2 new projects under development. The assessment covers 100% of the Company's operations within the defined scope.

1. Scope Definition and Human Rights Risk Identification

The assessment encompasses stakeholders across the entire value chain, including employees, communities, business partners, and customers. Risk levels are evaluated based on two key factors: likelihood of occurrence and severity of impact. This approach enables the systematic identification and prioritization of human rights risks, as well as the development of appropriate preventive and mitigation measures to comprehensively address potential impacts, as follows:

Scope of Human Rights Risk Assessment

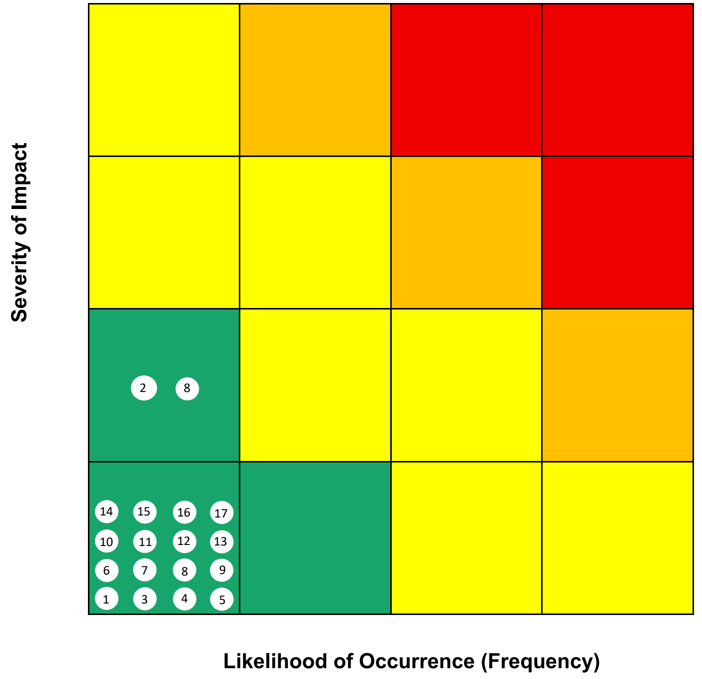
Employees	Community and Environment	Suppliers and Contractors	Customers
1. Discrimination and harassment 2. Occupational health and safety 3. Compensation and benefits 4. Working conditions 5. Freedom of association and collective bargaining 6. Employment of illegal labor 7. Shortage of skilled labor (new projects) 8. Labor shortage (new projects)	1. Community health and safety 2. Community livelihoods 3. Environmental and community impacts 4. Land acquisition	1. Discrimination and harassment 2. Occupational health and safety of suppliers 3. Compensation and benefits of supplier employees 4. Employment of illegal labor	1. Discrimination and harassment 2. Customer privacy and data protection

Risk Assessment Criteria

Risk Level	Likelihood of Occurrence (Frequency of events)	Impact				
		Severity of Impact				
		Customer Impact	Health and Safety Impact	Legal Impact	Environmental and Community Impact	Operational Impact
4	Occurs annually	Customers file lawsuits against the Company	Employees, contractors, or stakeholders suffer severe injuries or fatalities	Violation of applicable laws or regulations resulting in severe consequences, such as revocation of licenses or business suspension/closure.	Severe impacts on the environment or communities requiring more than one month for corrective actions, more than five years for mitigation and full restoration, or resulting in damage that is difficult or irreversible to remediate.	Severe disruption to production and operational processes, resulting in significant impacts on the achievement of targets and plans.
3	Occurs once every 1–5 years	Customers express dissatisfaction through various channels	Employees, contractors, or stakeholders suffer injuries or illnesses requiring hospitalization (inpatient care).	Non-compliance with applicable laws or regulations resulting in legal penalties, fines, or corrective actions required by regulatory authorities.	Significant impacts on the environment or communities, with corrective actions achievable within one month and full mitigation and restoration requiring one to five years	Disruption to production and operational processes, necessitating a partial suspension or slowdown of operations.
2	Occurs once every 5–10 years	Customers submit complaints to the Company	Employees, contractors, or stakeholders suffer injuries or illnesses requiring medical treatment (outpatient care) without hospitalization.	Non-compliance with applicable laws or regulations that impacts the Company's operations; however, such issues can be rectified immediately.	Impacts on the environment or communities, with corrective actions achievable within one day and mitigation and full restoration achievable within one year.	Impacts on production or operational processes that can be effectively controlled and resolved by the responsible functions.
1	Rare occurrence (more than 10 years or never occurred)	No impact on customers	Employees, contractors, or stakeholders sustain minor injuries requiring only first aid treatment.	Non-compliance with the Company's internal rules, regulations, policies, or standards.	Minor impacts on the environment or surrounding communities, with no corrective actions required.	Minor impacts on production or operational processes that can be independently controlled and resolved.

Low (1) Moderate (2) High (3) Very High (4)

2. Risk Assessment Results



		Key Human Rights Issues Assessed
Employee Rights	1	Discrimination and harassment
	2	Occupational health and safety
	3	Compensation and benefits
	4	Working conditions
	5	Freedom of association and collective bargaining
	6	Employment of illegal labor
	7	Shortage of skilled labor (for new projects)
	8	Labor shortage (for new projects)
Community and Environmental Rights	9	Community health and safety
	10	Community livelihoods
	11	Environmental and community impacts
	12	Land acquisition
Partner and Contractor Rights	13	Discrimination and harassment
	14	Occupational health and safety of suppliers
	15	Compensation and benefits of supplier employees
	16	Employment of illegal labor
Customer Rights	17	Discrimination and harassment
	18	Customer privacy and data protection

The Group has continuously implemented its Human Rights Policy, while monitoring and ensuring compliance with relevant requirements to promote the effective respect, protection, and safeguarding of human rights across the organization. In 2025, the human rights risk assessment conducted across the Group's operational areas identified no significant high-risk issues (salient issues) within its business operations. This outcome reflects the effectiveness of existing preventive and control measures in managing potential risks and in minimizing both the likelihood and severity of potential human rights impacts.

3. Preventive and Mitigation Measures for Human Rights Risk Issues

Based on the human rights risk assessment results in 2025, no human rights risk issues at a high level or exceeding the Group's defined risk tolerance were identified. This reflects the establishment and implementation of appropriate preventive and control measures to manage potential risks arising from business operations. These measures support effective human rights management and help reduce both the likelihood and severity of potential human rights impacts. The Group has also established preventive and control measures aligned with the nature of its business operations and categorized them according to stakeholder groups within the scope of the human rights risk assessment, as outlined below:

Stakeholders	Risk Issues	Preventive and Risk Control Measures
• Employees • Suppliers and contractors • Customers	• Discrimination and harassment	• Establish personal data management and protection systems, including guidelines for maintaining confidentiality and the appropriate use of stakeholder information in compliance with applicable laws. Such measures ensure that information is not used in any unlawful or inappropriate manner, while respecting the rights and privacy of all relevant stakeholders. • Establish a Supplier Code of Conduct and governance measures to ensure that suppliers and contractors treat employees fairly and equally, and respect human dignity, in alignment with the Group's Human Rights Policy. This includes provisions covering non-discrimination and the prevention of all forms of harassment. • Establish policies and practices on non-discrimination and zero tolerance for all forms of harassment, grounded in the principles of respect for human rights, human dignity, diversity, and inclusion among all stakeholder groups. The Group also promotes awareness and understanding through continuous training and communication to foster a workplace and service culture that is fair, equitable, and respectful. • Provide confidential, secure, accessible, and fair grievance channels for all stakeholder groups, together with transparent, traceable, and non-retaliatory processes for receiving, reviewing, and resolving complaints, in order to build trust and confidence.
• Employees • Community and Environment • Suppliers and contractors	• Occupational health and safety	• Establish safety policies, measures, and operational manuals in a systematic manner by defining clear safe work procedures covering all high-risk activities, including maintenance work, which is permitted only during equipment shutdown. These procedures are communicated to employees, suppliers, and contractors, all of whom are required to strictly comply. • Conduct risk assessments related to occupational health, safety, environment, and emergency situations prior to work commencement, during operations, and for activities that may impact surrounding communities and the

Stakeholders	Risk Issues	Preventive and Risk Control Measures
		environment. These assessments are used to evaluate site readiness, ensure safe working conditions, and determine appropriate risk control measures. • Regularly inspect, maintain, and control the safety of equipment, tools, and machinery. This includes the installation of remote control systems for machinery in high-risk areas to prevent accidents caused by equipment failure or unsafe operation. • Provide and require the use of appropriate personal protective equipment (PPE) in accordance with the nature of work, along with strict supervision of its usage. Work areas are clearly defined, warning signs are prominently displayed, access is restricted to authorized personnel only, and penalties are established for non-compliance with safety measures. • Provide regular training on safety, first aid, emergency response plans, and the periodic review of safe work procedures to enhance knowledge, awareness, and a safety-oriented culture across all levels of the organization, including suppliers and contractors. • Arrange annual health examinations for employees in accordance with the risk level of each job position to monitor and promote employee health appropriately. • Establish an emergency management system by developing prevention and emergency response plans related to operations and the activities of suppliers and contractors. Regular joint drills are conducted annually with relevant stakeholders. Communication channels are also provided to disseminate risk information, preventive measures, and emergency notifications to stakeholders and surrounding communities in a transparent, clear, and timely manner. • Implement a systematic process for monitoring, investigating, and reporting accidents or unsafe incidents. The information is analyzed and used to review and continuously improve occupational health and safety measures for greater effectiveness.
• Employees • Suppliers and contractors	• Compensation and benefits • Employment of illegal labor	• Review and adjust the compensation and benefits structure to ensure appropriateness, fairness, and equity, aligned with job roles, performance, current cost of living, and strict compliance with applicable labor laws. • Establish labor and human rights guidelines and requirements in accordance with relevant laws, labor standards, and both local and international frameworks to prevent the use of illegal labor, child labor, forced labor, and human trafficking in all forms, covering both the Company’s employees and the workforce of suppliers and contractors.

Stakeholders	Risk Issues	Preventive and Risk Control Measures
		• Include provisions in employment contracts and business agreements with suppliers and contractors requiring strict compliance with labor laws and related regulations. Such provisions cover the proper, fair, and lawful payment of wages, compensation, and employee benefits. • Conduct systematic, rigorous, and continuous verification of qualifications, identification documents, and employment status of both the Company's workforce and that of suppliers and contractors to effectively prevent risks related to illegal labor practices in all forms.
• Employees	• Working conditions • Shortage of skilled labor • Labor shortage	• Implement the 5S program to promote a well-organized, clean, safe, and healthy working environment that supports both the physical and mental well-being of employees. • Support flexible working arrangements that promote work-life balance by establishing remote working guidelines for certain positions or under appropriate circumstances, such as natural disasters, infectious disease outbreaks, or specific personal needs. • Conduct forward-looking workforce planning aligned with project development and operational plans, alongside proactive recruitment from the labor market and specialized talent pools, to ensure the availability of personnel with sufficient skills and expertise to meet organizational needs. • Promote systematic employee development through training, knowledge sharing, and career progression pathways to enhance skills and capabilities, supporting both current and future workforce requirements. • Utilize diverse employment models appropriate to the nature of work, such as permanent employees, contract employees, and contractors, to enhance workforce management flexibility. • Collaborate with local communities and relevant stakeholders to support employment opportunities and strengthen the local labor pool.
• Community and Environment	• Community livelihoods • Environmental and community impacts • Land acquisition	• Promote economic development and quality of life in local communities by implementing local employment initiatives, supporting local entrepreneurs and vendors where appropriate, and organizing social activities such as community outreach visits, patient assistance, and community development programs in areas surrounding its operations. • Establish continuous community engagement processes through meetings and consultations to gather feedback, suggestions, and concerns from stakeholders throughout the project lifecycle, including pre-operation, during operation, and post-operation phases. Accessible, convenient, fair, and traceable grievance mechanisms are also

Stakeholders	Risk Issues	Preventive and Risk Control Measures
		in place, covering complaint receipt, review, resolution, and remediation processes to strengthen confidence and trust. • Manage and mitigate environmental impacts with due care by conducting preliminary studies and assessments of natural resources prior to operations, and by designing appropriate water resource management systems to ensure sufficient supply, such as the provision of raw water storage ponds for year-round operations, in order to minimize impacts on community resource use. • Monitor and report social and environmental performance to relevant authorities on a regular basis to ensure compliance with applicable laws and standards, as well as alignment with the expectations of local communities and society.
• Customers	• Customer privacy and data protection	• Provide training and awareness to employees on personal data protection, confidentiality, and proper data usage to prevent unauthorized access, use, disclosure, or leakage of customer data. • Implement measures to safeguard customer personal data security in compliance with applicable laws, policies, regulations, and relevant requirements. • Review, update, and revise personal data protection policies and measures on an annual basis to ensure alignment with current laws, regulations, and best practices.

4. Monitoring and Reporting

- Continuously monitor, audit, and evaluate the organization’s human rights performance to ensure that business operations comply with applicable policies, laws, and relevant standards.
- Regularly review potential human rights risks and impacts arising from operations, including changes in the business context, legal requirements, and stakeholder expectations, in order to appropriately update preventive and risk control measures.
- Monitor complaints and cases of human rights violations, and implement systematic, fair, and transparent processes for remediation, corrective actions, and prevention of recurrence.
- Report human rights performance to senior management and relevant departments to support ongoing policy development and operational direction.
- Utilize the outcomes of monitoring and reviews to continuously improve human rights policies, guidelines, and management processes, thereby enhancing the organization’s long-term operational standards.

5. Grievance Mechanisms and Remedy

The Group has established mechanisms and channels for receiving whistleblowing reports and complaints related to actions that may constitute violations of company policies, laws, or regulations, as well as human rights violations. These channels are the same as those used for reporting corruption and anti-bribery concerns and are accessible to employees, suppliers, communities, and all stakeholder groups. The reporting channels are designed to be convenient, secure, and confidential. Whistleblowers are protected in accordance with the Group's policies, with no retaliation or discrimination. The Company conducts investigations into reported cases in a fair, transparent, and systematic manner and provides appropriate remedies in accordance with established procedures.

In 2025, based on the human rights risk assessment, the Company did not identify any cases of non-compliance with labor standards or human rights violations within its operational areas.

Human Rights Remedy Measures

The Group has established human rights remedy measures to address potential risks and impacts arising from its business operations, in alignment with international human rights principles. These measures cover all stakeholder groups across the value chain. Key practices include:

1. Providing safe, fair, and confidential grievance mechanisms and reporting channels for stakeholders to raise concerns or report human rights violations.
2. Protecting complainants and whistleblowers from retaliation and all forms of discrimination.
3. Conducting independent, transparent, and fair investigations when human rights violations are reported or identified.
4. Providing appropriate and fair remediation in line with the nature and severity of the impacts, and monitoring the effectiveness of corrective actions to prevent recurrence.
5. Communicating and reporting the outcomes of remediation actions to relevant stakeholders in an appropriate and timely manner.

Whistleblowing Channels

1. Company website: www.ace-energy.co.th under the "Whistleblowing Channel" section
2. Whistleblowing and complaint boxes: Located within the Company premises and in communities where the Company operates