

Respect for Human Rights Principles

Human Rights Management Process

In 2024, the Company participated in a practical training workshop on comprehensive human rights due diligence throughout the value chain for listed companies in the industrial, agriculture and food, real estate and construction, and resources sectors. The training was organized by the Global Compact Network Thailand (UNG CNT) in collaboration with the Stock Exchange of Thailand (SET), under the course “**Comprehensive Human Rights Due Diligence throughout Business Operations and the Value Chain.**” This training is part of the Business and Human Rights Academy and aims to enhance the capacity of the business sector in conducting comprehensive human rights due diligence.

The Company has established a comprehensive Human Rights Due Diligence (HRDD) process consisting of the following five steps :



1. Establishment of a Human Rights Policy

The Company places importance on human rights issues that may impact its business operations throughout the value chain involving stakeholders. Therefore, the Company has established a **Human Rights and Non-Discrimination Policy** in alignment with the principles of the United Nations Global Compact (UN Global Compact), the Universal Declaration of Human Rights (UDHR), and the United Nations Guiding Principles on Business and Human Rights (UNGPs) as a framework and operational guideline. This is to prevent and avoid human rights violations concerning employees within the Group, partners/suppliers/contractors, customers, and local communities. **The Risk Management and Corporate Governance Committee** is assigned to oversee human rights compliance and to define guidelines that promote confidence in conducting business that respects human rights. The Human Rights Policy is published on the Company’s website at the following link: <https://www.ttwplc.com/storage/about/policy/20220124-ttw-human-right-policy-en.pdf> The Company has set operational goals related to the respect for human rights as follows :

Operational Goals for Respecting Human Rights

<input checked="" type="checkbox"/>	Be a role model in promoting human rights across the business value chain
<input checked="" type="checkbox"/>	Zero human rights violations, internal and external

- Employment and Human Rights Respect

Employees are regarded as valuable resources of the organization. The Company has therefore implemented an employment management system to ensure employees are treated fairly and protected under appropriate conditions, leading to improved quality of life and greater work efficiency. The Company has established and published its Human Rights and Labor Policies on its website as a guideline to ensure compliance with Thai labor standards, labor laws, and other relevant regulations, along with the ongoing improvement and development of work practices. Additionally, the Company has issued a Personal Data Protection Policy to explain the Company's approach to protecting the personal data and privacy of stakeholders. The Company incorporates human rights considerations into its employment practices as follows :

Type of Labor	Human Rights Issues
1. Child Labor	The Company neither employs nor engages in, nor supports, the use of child labor under the age of 15. The Company also refrains from assigning or supporting work that is hazardous to children's health or takes place in environments that are dangerous to health and safety.
2. Forced Labor	The Company does not employ or support the use of forced labor, such as work performed involuntarily, including any means of coercion, punishment, threats, or intimidation that result in individuals working unwillingly or being placed in situations where resistance is not possible.
3. Illegal Migrant Labor	The Company neither employs nor supports the use of undocumented migrant workers or those who have entered the country illegally.
4. Pregnant Employees	The Company does not assign pregnant employees to work that is hazardous to their health or physical well-being as defined by law. The Company ensures that pregnant employees work in a safe and healthy environment, and does not terminate, demote, or reduce any rights or benefits due to pregnancy.

- Employment of Persons with Disabilities or Other Disadvantaged Groups

The Company complies with the Persons with Disabilities Empowerment Act in relation to the employment of persons with disabilities or other disadvantaged groups. The Company collaborates with the Nakhon Pathom Provincial Labor Office to hire caregivers of persons with disabilities through a subcontracting arrangement. This initiative aims to provide employment opportunities to caregivers and support the Ministry of Social Development and Human Security's program that allows employers or business owners to subcontract work to persons with disabilities or their caregivers under Section 35 of the Persons with Disabilities Empowerment Act B.E. 2550. In 2024, the Company employed persons with disabilities or other disadvantaged groups as follows :

Unit: Person

Employment	2022	2023	2024
1. Employment of persons with disabilities	1	1	1
2. Employment of other disadvantaged groups	0	0	0
Total	1	1	1

2. Human Rights Due Diligence (HRDD) Process

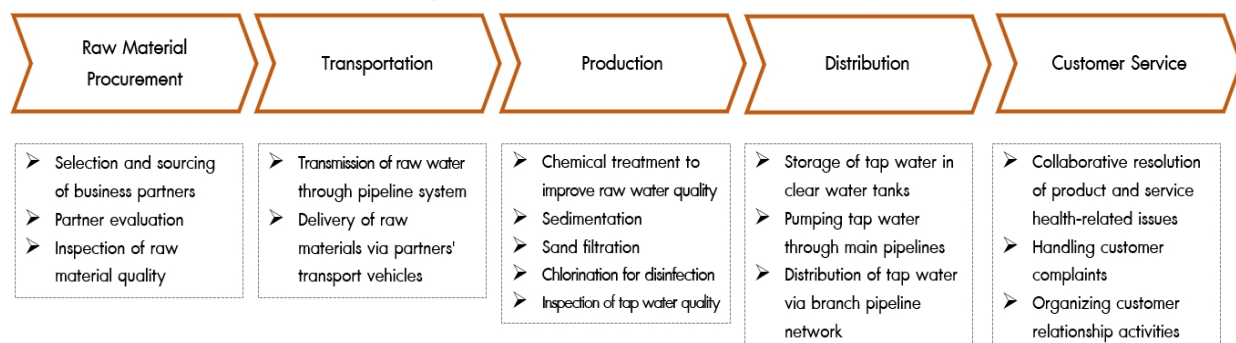
2.1 Defining the Scope of the Assessment

The Company conducts human rights risk and impact assessments every three years, or when events occur that may change the level of risk or impact. This includes identifying human rights issues and potential impacts on all stakeholder groups, including employees, contractors, communities, and vulnerable groups such as women, indigenous peoples, migrant workers, LGBTQ individuals, the underprivileged, persons with disabilities, and children. The assessment also considers the likelihood of human rights impacts arising from operational activities and the Company's areas of operation in all countries where it conducts business particularly in sensitive areas, conflict zones, or areas affected by war or unrest (conflicted-area).

The scope of the Human Rights Due Diligence (HRDD) covers the period from January 1 to December 31, 2024, and includes the Company's business operations related to the production and distribution of tap water to the Provincial Waterworks Authority (PWA), as well as the production of tap water and wastewater treatment for Bangpa-in Industrial Estate, Amata City Chonburi Industrial Estate, and Amata City Rayong Industrial Estate. This encompasses five service areas : Nakhon Pathom–Samut Sakhon, Pathum Thani–Rangsit, Bangpa-in Industrial Estate in Phra Nakhon Si Ayutthaya Province, Amata City Industrial Estate in Chonburi Province, and Amata City Industrial Estate in Rayong Province.

2.2 Identification of Relevant Human Rights Issues

2.2.1 Value Chain and Operational Processes



2.2.2 Human Rights Risk Issues Throughout Business Operations and the Value Chain

Value Chain	Relevant Stakeholders	Broad Risk (Topics)	Actual/Potential Risk Events or Situations (Issues)	Type		
				Cause	Contribute	Link to
Raw Material Procurement	▪ Employees	▪ Occupational health and safety	▪ Labor rights : Working beyond legal limits, illness and occupational accidents	✓		
	▪ Suppliers of goods and services	▪ Data privacy	▪ Data privacy breach	✓		
	▪ Communities and environment	▪ Occupational health and safety	▪ Illness and accidents of business partners/contractors			✓
Transportation	▪ Employees	▪ Occupational health and safety	▪ Labor rights: Working beyond legal limits, illness and occupational accidents	✓		
	▪ Suppliers of goods and services	▪ Occupational health and safety	▪ Illness and occupational accidents		✓	
	▪ Communities and environment	▪ Occupational health and safety	▪ Illness and accidents of business partners/contractors			✓
Production	▪ Employees	▪ Occupational health and safety	▪ Labor rights: Working beyond legal limits	✓		
			▪ Illness and occupational accidents	✓		
	▪ Direct and indirect customers	▪ Occupational health and safety ▪ Data privacy	▪ Product quality non-compliance affecting health ▪ Data privacy breach	✓ ✓		
	▪ Communities and environment	▪ Occupational health and safety	▪ Product quality non-compliance affecting health	✓		

Value Chain	Relevant Stakeholders	Broad Risk (Topics)	Actual/Potential Risk Events or Situations (Issues)	Type		
				Cause	Contribute	Link to
Distribution	▪ Employees	▪ Occupational health and safety	▪ Labor rights : Working beyond legal limits ▪ Illness and occupational accidents	✓ ✓		
	▪ Direct customers (PWA)	▪ Occupational health and safety ▪ Data privacy	▪ Inadequate and inconsistent tap water ▪ Data privacy breach	✓ ✓		
	▪ Indirect customers (water users)	▪ Occupational health and safety ▪ Data privacy	▪ Inadequate and inconsistent water supply ▪ Data privacy breach		✓	✓
	▪ Communities and environment	▪ Occupational health and safety	▪ Product quality non-compliance affecting health	✓		
Customer Service	▪ Employees	▪ Occupational health and safety	▪ Labor rights : Working beyond legal limits ▪ Illness and occupational accidents	✓ ✓		
	▪ Direct customers (PWA)	▪ Occupational health and safety ▪ Data privacy	▪ Product quality non-compliance affecting health ▪ Data privacy breach	✓ ✓		
	▪ Indirect customers (water users)	▪ Occupational health and safety ▪ Data privacy	▪ Product quality non-compliance affecting health ▪ Data privacy breach		✓	✓
	▪ Communities and environment	▪ Occupational health and safety	▪ Product quality non-compliance affecting health	✓		

3. Human Rights Risk Assessment, Preventive and Corrective Measures, and Remediation

The Company places great importance on respecting human rights, which is a fundamental principle of work and coexistence. It promotes and supports the TTW Group in applying the principles of human rights in its operations. The scope covers all stakeholders, including employees, customers, business partners/suppliers/contractors, and communities, with transparency and efficiency. The process for human rights risk assessment is as follows :

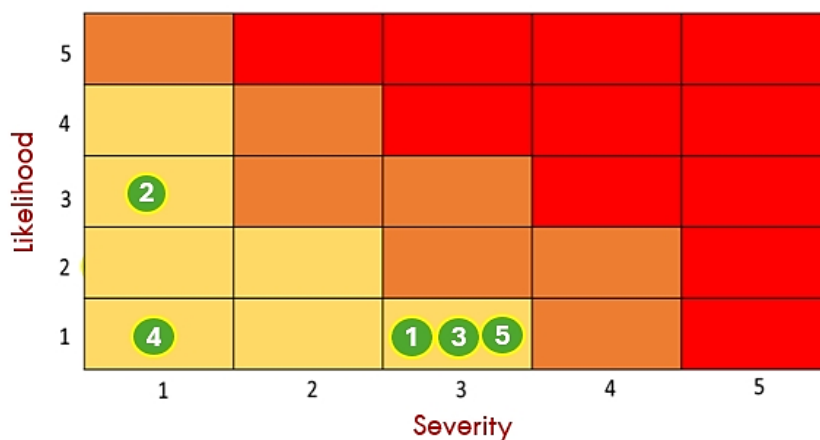
3.1 Analysis of Severity of Impact and Likelihood of Occurrence

3.1.1 Assessment of Significance of Risk Events/Situations

Risk Event/Situation Already Occurred / Potential (Issue)	Severity				Likelihood
	Scale	Scope	Irremediability	Average Score	
1. Illness and occupational accidents of employees, business partners, and communities	3	2	3	3	1
2. Data privacy breach	2	1	1	1	3
3. Non-compliance with product quality standards affecting health	4	4	2	3	1
4. Labor rights : Working beyond legal limits	1	1	1	1	1
5. Inadequate and inconsistent water supply	4	4	2	3	1

3.1.2 Assessment of Significance of Risk Topics (Risk Events/Situations)

Risk Event/Situation (Issue) Already Occurred / Potential	Severity	Likelihood
1. Illness and occupational accidents of employees, business partners, and communities	3	1
2. Data privacy breach	1	3
3. Non-compliance with product quality standards affecting the health of direct/indirect customers and communities	3	1
4. Labor rights : Working beyond legal limits (employees and business partners)	1	1
5. Inadequate and inconsistent water supply	3	1



3.2 Risk Prevention and Mitigation Measures

Risk Issue	Risk Level	Responding Measures	Indicator	Tracking Measures
Cause				
1. Illness and work-related accidents of employees	Low	1) Establish safety, occupational health, and work environment policies/practices 2) Conduct training and emergency drills according to plans 3) Conduct annual health checks and follow up on employees at risk	<ul style="list-style-type: none"> Proportion of participants in training Number of illness and accident incidents 	<ul style="list-style-type: none"> Interviews with workers Internal audit by the Safety Committee
2. Data privacy breach of partners and direct customers (PWA)	Low	1) Establish personal data protection policies/practices 2) Assign responsible personnel for data breach cases 3) Provide ongoing training for new and existing employees 4) Implement disciplinary actions for violators as per company regulations	<ul style="list-style-type: none"> Proportion of training participants Number of data privacy breach incidents involving partners and direct customers (PWA) 	<ul style="list-style-type: none"> Review access logs by the IT department
3. Product quality non-compliance impacting health of direct customers (PWA)	Low	1) Develop product and service quality manuals in accordance with ISO 9001 2) Comply with TISI 257 Part 1-2521. 3) Follow the quality policy: "Quality, Adequate, and Continuous" 4) Conduct internal and external water quality inspections	<ul style="list-style-type: none"> Percentage of satisfaction with product quality from direct customers (PWA) Number of product quality complaints from direct customers (PWA) 	<ul style="list-style-type: none"> Interviews with executives of direct customers (PWA) Review complaint reports for continuous improvement
4. Labor rights violations involving working beyond legal hours	Low	1) Establish human rights policies/practices for employees 2) Assign responsible personnel in the event of labor rights violations	<ul style="list-style-type: none"> Percentage of employee satisfaction with working conditions Percentage of employee satisfaction with working conditions 	<ul style="list-style-type: none"> Interviews with workers Internal audit by HRA or designee Review labor rights complaint reports

Risk Issue	Risk Level	Responding Measures	Indicator	Tracking Measures
		3) Provide training on employee human rights 4) Implement disciplinary actions as per company regulations for violators	<ul style="list-style-type: none"> Number of labor rights violation incidents involving employees 	
5. Inadequate and inconsistent water supply to direct customers (PWA)	Low	1) Develop product and service quality manuals in accordance with ISO 9001 2) Follow the quality policy: "Quality, Adequate, and Continuous." 3) Assign responsible personnel in case of issues 4) Establish urgent response teams. 5) Utilize the SCADA system for real-time pressure monitoring	<ul style="list-style-type: none"> Percentage of satisfaction with service and delivery from direct customers (PWA) Number of complaints related to service and delivery from direct customers (PWA) Number of incidents involving inadequate and inconsistent water supply to direct customers (PWA) 	<ul style="list-style-type: none"> Interviews with executives of direct customers (PWA) Review complaint reports for continuous improvement
Contribute				
1. Illness and work-related accidents of partners	Low	1) Establish occupational health and safety and work environment policies/practices for partners/contractors. 2) Provide pre-work safety training. 3) Apply fair and appropriate measures in case of incidents	<ul style="list-style-type: none"> Number of partners acknowledging occupational health and safety policies/practices Number of illness and accident incidents involving partners 	<ul style="list-style-type: none"> Site visits to partners' facilities ESG audits of high-risk key partners
2. Product quality non-compliance impacting the health of indirect customers (end users)	Low	Assign responsible persons/direct customer service teams (PWA) to support product quality information	<ul style="list-style-type: none"> Number of product quality complaints from indirect customers (end users) via direct customers (PWA) 	<ul style="list-style-type: none"> Interviews with executives of indirect customers (end users) Review complaint reports for continuous improvement

Risk Issue	Risk Level	Responding Measures	Indicator	Tracking Measures
3. Inadequate and inconsistent water supply to indirect customers (end users)	Low	Assign responsible persons/direct customer service teams (PWA) to provide technical support to ensure adequate and continuous water supply	<ul style="list-style-type: none"> Number of service complaints, e.g., low pressure, weak flow, from indirect customers (end users) via direct customers (PWA) 	<ul style="list-style-type: none"> Interviews with executives of indirect customers (end users) Review service-related complaint reports for continuous improvement
Link to				
1. Work accidents of partners impacting communities	Low	1) Provide pre-work safety training. 2) Define safety requirements and entry conditions for work sites.	<ul style="list-style-type: none"> Number of partners acknowledging occupational health and safety policies/practices Number of work-related accidents of partners impacting communities 	<ul style="list-style-type: none"> Interviews with affected communities
2. Data privacy breach of indirect customers (end users)	Low	Provide personal data protection training to direct customers (PWA).	<ul style="list-style-type: none"> Proportion of trained personnel at direct customers (PWA) Number of data privacy breach incidents involving indirect customers (end users) 	<ul style="list-style-type: none"> Interviews with executives of indirect customers (end users)

3.3 Guidelines for Human Rights Complaint Management and Remediation

3.3.1 Procedure upon Receipt of a Complaint

1) The Human Resources and Administration Executive is responsible for collecting details of the complaint and submitting them to the Managing Director for consideration in appointing an investigation committee. The committee shall consist of qualified and impartial experts to investigate the complaint within 7 days from the date of receipt.

2) The appointed investigation committee shall gather information, evidence, and conduct interviews with relevant parties. The committee shall also consider preventive and mitigation measures to avoid future human rights violations or alleviate damage to affected persons. Consideration will be given to the overall impact and disciplinary or legal action against the offender. A report shall be prepared and submitted to the Managing Director or the Board for consideration within 15 days from the appointment date.

3) The relevant department shall proceed according to the decision of the Managing Director and report the outcome accordingly.

4) The Human Resources and Administration Department shall compile and document the complaints to be included in the company's annual report.

3.3.2 Whistleblower and Complainant Protection Measures

The Company has established measures to safeguard the confidentiality of complaints and limit information access to only relevant personnel. This is to ensure the complainant's confidence and sense of security. Complainants may choose to disclose their identity or remain anonymous. Where deemed appropriate, the Company may implement special protective measures if there is a foreseeable risk of harm or danger.

Should a human rights violation complaint arise, the Company is committed to listening and bringing the matter to the management meeting for fair and equal remediation to affected individuals.

In 2024, the Company and its subsidiaries had no lawsuits or complaints related to human rights violations, legal misconduct, or business ethics issues concerning employees, customers, partners/suppliers/contractors, communities, or other relevant stakeholders. These are areas that require high attention from businesses, and the Company is committed to aligning its operations with international human rights principles and national laws.

Available Complaint Channels for Human Rights Violations :



Postal Mail

Office of the Managing Director, TTW Public Company Limited, 30/130 Moo 12, Phutthamonthon Sai 5 Road, Rai Khing Subdistrict, Sam Phran District, Nakhon Pathom Province



Email

cg@ttwplc.com



Phone

(+622) 019-9490-3 (+622) 019-9484-9 Ext. 1106

3.3.3 Human Rights Remediation Measures

Affected persons shall receive appropriate and fair relief or compensation from the Company, under its administrative mechanisms and in accordance with legal principles. Preventive policies or measures will also be implemented to avoid recurrence of similar impacts in the future.

4. Monitoring and Reporting of Human Rights Risk Assessment Results

The results of the human rights risk assessment in the Company's business operations indicated that, in 2024, there were no human rights violations against employees, customers, business partners, contractors, or communities. However, the Company has established preventive guidelines and risk mitigation measures for stakeholders as follows :

In 2024, the Company and its subsidiaries had no lawsuits or complaints related to human rights violations, legal non-compliance, or breaches of business ethics concerning employees, customers, partners/suppliers/contractors, communities, or other relevant stakeholders. These matters are of critical importance to the business sector, and the Company is committed to defining operational guidelines aligned with comprehensive human rights protection principles in accordance with international standards and national laws.

4.1 Human Rights Risk Assessment Results by Stakeholder Group are Categorized as Follows :

4.1.1 Employee Human Rights

Risk Issues	Impacts	Mitigation Measures	Assessment Results		
			2022	2023	2024
Occupational Health and Safety	<ul style="list-style-type: none"> ▪ Right to quality of life ▪ Right to work 	<p>Occupational Safety</p> <ul style="list-style-type: none"> ▪ Organize training courses on occupational safety concerning hazardous chemicals, use of personal protective equipment, environmental awareness for workers in confined spaces, and review of crane operation practices ▪ Conduct drills and refreshers on safe handling of chlorine and use of chlorine leak containment tools (Emergency Kit-B) ▪ Develop emergency response plans for severe chlorine leaks ▪ Procure equipment to prevent chlorine vapor and leakage <p>Occupational Health</p> <ul style="list-style-type: none"> ▪ Provide annual health check-ups for employees at all levels ▪ Expand health check-up items for employees in high-risk areas and those aged 35 and above ▪ Increase medical expense limits for employees 	No	No	No

Risk Issues	Impacts	Mitigation Measures	Assessment Results		
			2022	2023	2024
Protection of Rights and Personal Data	<ul style="list-style-type: none"> ▪ Right to equality ▪ Right to legal protection ▪ Right to privacy 	<p>Employee Rights Protection</p> <ul style="list-style-type: none"> ▪ Implement human rights and labor policies ▪ Establish a grievance mechanism for employees ▪ Treat employees equitably and fairly <p>Personal Data</p> <ul style="list-style-type: none"> ▪ Protect employees' personal data and prohibit disclosure to third parties ▪ Publish the Personal Data Protection Policy on the Company's website ▪ Conduct training and define operational guidelines regarding personal data protection laws 	No	No	No

4.1.2 Customer Human Rights

Risk Issues	Impacts	Mitigation Measures	Assessment Results		
			2022	2023	2024
Product and Service Quality	<ul style="list-style-type: none"> ▪ Right to quality of life 	<p>Communication and Safety</p> <ul style="list-style-type: none"> ▪ Continuously communicate and disseminate information on products and services ▪ Adhere to product and service quality policy 	No	No	No
Protection of Rights and Personal Data	<ul style="list-style-type: none"> ▪ Right to equality ▪ Right to legal protection 	<p>Customer Rights Protection</p> <ul style="list-style-type: none"> ▪ Establish a grievance mechanism for customers ▪ Provide compensation for damages to customers as per the agreed 	No	No	No

Risk Issues	Impacts	Mitigation Measures	Assessment Results		
			2022	2023	2024
	<ul style="list-style-type: none"> Right to privacy 	Personal Data <ul style="list-style-type: none"> Publish the Personal Data Protection Policy on the Company's website Protect customers' personal data and prohibit disclosure to third parties 			

4.1.3 Business Partner Human Rights

Risk Issues	Impacts	Mitigation Measures	Assessment Results		
			2022	2023	2024
Fair Business Practices	<ul style="list-style-type: none"> Compliance with commercial terms Fair contractual practices 	<ul style="list-style-type: none"> Implement Supplier Code of Conduct (SCOC) covering labor practices, human rights, safety, occupational health, and environmental responsibility; publish on the Company website Conduct screening process for business partners as required by law 	No	No	No
Protection of Rights and Personal Data	<ul style="list-style-type: none"> Right to equality Right to legal protection Right to privacy 	Partner Rights Protection <ul style="list-style-type: none"> Establish a grievance mechanism for partners Treat business partners equitably and fairly Personal Data <ul style="list-style-type: none"> Publish the Personal Data Protection Policy on the Company's website Protect partners' personal data and prohibit disclosure to third parties 	No	No	No

4.1.4 Community Human Rights

Risk Issues	Impacts	Mitigation Measures	Assessment Results		
			2022	2023	2024
Quality of Life, Safety, and Environment	<ul style="list-style-type: none"> Right to legal protection Freedom of expression Right to quality of life 	<p>Quality of Life and Safety</p> <ul style="list-style-type: none"> Communicate in advance before water pipe maintenance Assess needs and provide grievance channels Establish remedies for impacts caused by Company operations <p>Environment</p> <ul style="list-style-type: none"> Operate in compliance with ISO 14001:2015 Dispose of sludge waste in accordance with Industrial Works Department regulations Collaborate to protect natural water resources 	No	No	No

4.1.5 Contractor Human Rights

Risk Issues	Impacts	Mitigation Measures	Assessment Results		
			2022	2023	2024
Quality of Life and Safety	<ul style="list-style-type: none"> Right to legal protection Right to quality of life 	<ul style="list-style-type: none"> Comply with occupational safety, health, and environmental laws Implement occupational safety, health, and environmental policies Train and enforce safety regulations Provide basic and job-specific personal protective equipment 	No	No	No

4.2 Process for Monitoring and Improving Risk Control Measures

The human rights risk assessment is conducted every three years, with the Human Resources and General Administration Department serving as the main responsible unit, supported by relevant departments, to ensure that the assessment process complies with international standards. In addition to the triennial assessment, **the Company conducts annual reviews** and monitoring of human rights risks to evaluate **the effectiveness of preventive plans, impact mitigation, and remediation measures** throughout the value chain, to ensure that the Company's business operations are aligned with international human rights principles and can appropriately minimize the impact on stakeholders.

5. Raising Awareness among Stakeholders

5.1 Collaboration with Business Partners on Human Rights

The Company has extended its human rights responsibilities to its business partners through the use of the **Supplier Code of Conduct (SCOC)**, covering labor and human rights practices, safety and occupational health, and environmental aspects. The SCOC is published on the Company's website at the following link: <https://www.ttwplc.com/storage/about/policy/20240206-ttw-supplier-coc-en.pdf>

In 2024, the Company had no disputes, conflicts, or complaints regarding human rights violations or issues involving legal or business ethics breaches by its business partners.

5.2 Communication and Training on Human Rights

Human rights are the fundamental rights and freedoms to which all humans are entitled, including equality, fairness, and non-discrimination. Human rights are increasingly recognized as a global priority and represent one of the core principles affecting business operations. Therefore, the Company is committed to continuously promoting communication and training on human rights for both current and new employees.

In 2024, the Company promoted and encouraged employee participation in human rights-related training courses under the "ESG DNA" for Corporate Employees program, specifically the course titled "Business and Human Rights."