

Human Rights Policy and Guidelines

| Revision no. | 0 |
|----------------|--|
| Effective Date | 2 May 2025 |
| Approved by | Resolution of Board of Directors Meeting no.4/2025 held on 24 April 2025 |

1. Principle and justification

Bangkok Airways Public Company Limited (the Company) recognizes the importance of human rights and respect of human rights as fundamental code of business conduct and peaceful coexistence in the society. The Company strictly complies with the law and various internationally acceptable measures particularly support and compliance with Universal Declaration of Human Rights (UDHR); United Nations Global Compact (UNCGs); United Nations Guiding Principles on Business and Human Rights (UNGP) and The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work including provisions prescribed in Thai laws.

In this case, with realization that operation of company business shall be free from human rights violation, the Company considered as appropriate to establish Human Rights Policy and Guidelines to prevent violation of human rights in all of the Company's business activities.

2. Objectives

- 2.1 To prevent violation of human rights or creation of impact on human rights and labor practices in all activities to operate company business.
- 2.2 To ensure management of human rights is conducted under the same standard throughout the Company.
- 2.3 To protect employees from discrimination and all kinds of harassments including to promote mutual work and provide opportunities for employees to equally able to improve themselves.
- 2.4 To promote implementation of human rights and labor practices of suppliers and stakeholders throughout value chain.

3. Scope

This Human Rights Policy and Guidelines is applicable to people involved in all activities that the Company has executive power such as the Company Board of Directors, executives, and employees of Bangkok Airways Public Company Limited. The Company also aims to encourage contracting partners, business partners, suppliers, contractors and other parties related to the Company to support and comply with this Policy and Guidelines by study more details in Supplier's Code of Business Conduct so that the principle can be put into practice in the same direction.

4. Definitions

- 4.1 Human Rights means basic and necessary rights and freedom that every individual shall receive equally and fairly simply from being born as human being, regardless of differences of race, ethnic origin, religion, culture, language, life style, sex, external looks, age, intelligence or physical or mental disabilities, or inequality in social and economic status however much more or less, including freedom from slavery and torture, human traffic, harassment, discrimination and labor forced etc.
- 4.2 Discrimination means unfair treatment or segregation at will with reference to race, ethnic origin, religion, culture, language, life style, sex, external looks, age, intelligence or physical or mental disabilities, or inequality in social and economic status, discrimination may be an isolated incident with impact on one person or group of people under similar situation or expressed through harassment or abuse of authority.

- 4.3 Harassment/Threat means unsuitable and unwelcome behavior which may be expected or reasonably acknowledged that will cause other people to be angry or embarrassed. Harassment/threat may be made by verbal or physical action, gestures or behaviors that irritate or causing panic. The act of scolding, threatening, bullying or oppressing or embarrassing other people or creating hostile and offensive work environment, or causing dissatisfaction including physical abuse, bullying, physical contact, or unnecessary approach towards another person but excludes conflict of opinion regarding performance of duties or result of performance. Harassment also means sexual harassment.
- 4.4 Sexual Harassment means unwelcomed sexual advances, requests for sexual favors or satisfaction or other verbal or physical conduct of sexual nature which may be expected or reasonable acknowledged that will cause others to be angry or embarrassed. Sexual harassment may be applied to persons of same or different sex.
- 4.5 Vulnerable groups means groups of persons that are unable to protect own rights and advantages due to lack of power, education, resources, strength etc. and are at risk of human rights impact such as women, disabled people, children, indigenous people, immigrants workers, people with diverse sexualities, workers of business partners, suppliers/contractors in business value chain and the community etc.

5. Duties and Responsibilities

5.1 The Company Board of Directors

- 5.1.1 Prescribe that the Company need to put Human Rights Policy and Guidelines in place
- 5.1.2 Supervision to ensure the Policy is put into practice and problems are acknowledged

5.2 Executives

- 5.2.1 Provide structure and practical guideline as suitable to business context
- 5.2.2 Promote and support personnel to comply with human rights principles
- 5.2.3 Follow up and supervise compliance with policy and guidelines

5.3 Division or person with human rights responsibilities

- 5.3.1 HR Department to produce Human Rights Policy and Guidelines to prevent violation of human rights in all of the Company activities, which is a part of Code of Business Conduct
- 5.3.2 HR Department to communicate concept, objectives, knowledge and understanding of human rights to personnel and all groups of stakeholders
- 5.3.3 Company Secretary Department to review compliance with Human Rights Policy and Guidelines by HR Department and report to Corporate Governance and Sustainability Committee at least once a year
- **5.4 Employees** to have an understanding of and comply with Human Rights Policy and Guidelines including to report or provide clues if come across actions that are contrary to the Policy and Guidelines, as well as be ready to support business partners and joint ventures to take part in operation of business according to human rights principles.

6 Guidelines

6.1 Board of Directors, executives and employees of the Company shall respect human rights, treat each other with respect, honor one another, treat one another as equal, without discrimination based on differences of race, ethnic origin, religion, culture, language, life style, sex, external looks, age, intelligence, physical or mental disabilities or inequality in economic and social status of stakeholders and all vulnerable groups in all locations where the Company operates business.

- 6.2 Executives and employees shall perform duties with caution, to prevent the risk of human rights violation in operation of business both directly or indirectly to all related stakeholders, including the commitment to prevent all types of harassments, whether sexual other types of harassments. The Company adheres to keeping all information in confidence, to offer understanding and treat all parties with fairness in accordance with the law.
- 6.3 Executives to comprehensively analyze and assess all human rights impact in all of the company's business activities consistently and systematically, at the same time also set guidelines to monitor, check and manage the impact as appropriate. When violation of human rights should occur, the Company must investigate and consider responsibility immediately and also take remedial action to appropriately and effectively mitigate the impact according to justice and equality principles.
- 6.4 Executives and employees to keep an eye on human right respect, not to omit or ignore when come across actions that constitute human rights violation relating to the Company. The finder must report to superior or responsible person and cooperate in verification of fact, if there are any doubts or when requiring advice whether or not such action should violate the law, regulations or this Policy and Guidelines, to consult his/her superior or HR Department or other responsible persons through various channels as specified.
- **6.5** The Company to provide channel for notifying clues and/or complaints in reporting the incident ensuring fairness and protection of person who reports case of human rights violation relating to the Company under whistle blower protection measures or person who assists in reporting human rights violation as follows:

Channel to report clues and/or complaints to the Company

By email: whistleblower@bangkokair.com to the company independent director.

- 6.6 Employee who commits an offence by violation of human rights, behaving with discrimination or harassment, is considered as non-compliance with the Company Code of Conduct. The Company shall take disciplinary action according to Employee's Rules and Regulations or proceed according to other related policies set by the Company, depending on severity of each case. In addition if such action is against the law, the Company shall take legal action with no exception.
- **6.7** Human Resourced Department to review this policy once a year or when significant changes were to happen.