

Human Rights Policy

Prima Marine Public Company Limited

2026 Revised Edition

Human Rights Policy

The Board of Directors, executives and employees of Prima Marine Public Company Limited and its subsidiaries (the "Company") recognize the importance of respecting the human rights of individuals, society and communities, as well as treating all groups of stakeholders equally and without discrimination under the legal framework and in alignment with international human rights principles, including the United Nations Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the ILO Declaration on Fundamental Principles and Rights at Work. The Company is committed to applying these policies, principles and international frameworks as guidelines for its operations to support internationally recognized responsible business conduct and to prevent human rights violations in its work processes. The Board of Directors therefore deems it appropriate to establish this Human Rights Policy and related practices to prevent human rights violations in the Company's business activities, covering all groups of stakeholders, including shareholders, investors, employees, business partners, customers and communities. Accordingly, the Company has established this Human Rights Policy and practices, covering the following key matters:

1. Scope of Application

This Human Rights Policy applies to the directors, executives and employees of the Company and its subsidiaries, as well as relevant person, covering all activities in the Company's business operations and relevant stakeholders, including employees, business partners, customers and related communities. This Policy also covers vulnerable groups who may be affected by the Company's business operations and other related activities.

2. Definitions

"Human Rights" means the rights to which all human beings are equally entitled, without infringement of fundamental rights and without discrimination on the basis of race, nationality, religion, language, skin color, gender, age, education, physical condition, social status or any other matter under the laws of each country and treaties to which each country is obligated to comply. This includes the right to

life, equality of persons, and the protection of thoughts and actions free from infringement, as recognized under the Constitution of the Kingdom of Thailand and international treaties.

“**Employees**” means employees and workers at all levels, as defined by the Company's work rules and regulations.

“**Business Partners**” means sellers, contractors and/or service providers, whether juristic persons or natural persons, to the Company, and/or persons who have entered an arrangement to work with the Company to achieve common goals in improving operational efficiency.

“**Shareholders**” means shareholders of Prima Marine Public Company Limited.

3. Policy

The Company conducts its business with integrity, recognizes the importance of human rights, and is committed to preventing any actions or operation that do not comply with the applicable laws, including the following:

- Treating everyone equally in accordance with human rights principles, without discrimination and free from all forms of harassment (including sexual harassment and other forms of harassment), covering all relevant stakeholders.
- Avoiding business operations that may directly or indirectly cause human rights violations by assessing risks, supervising relevant parties, and providing appropriate mechanisms to prevent and remedy impacts.
- Respecting and supporting every employee's right and freedom of expression, association and collective bargaining, in strict compliance with the law and good corporate governance principles, as well as supporting and encouraging the Company's personnel to respect and comply with human rights principles.
- Communicating, educating and disseminating human rights practices to the Company's personnel throughout across all departments and operating areas, and to stakeholders in the value chain. This includes embedding an organizational culture among employees and business partners in the Company's value chain so that they participate in conducting

business with integrity, respect human rights, and treat everyone in accordance with this Policy. This shall be carried out through new employee orientation, training, internal communications and appropriate dissemination channels so that executives and employees at all levels are thoroughly informed of and understand the Policy. Communication or translation into relevant languages shall also be provided as appropriate for the target groups.

4. Duties and Responsibilities

Board of Directors

1. Consider, approve and review policies and practices to prevent human rights violations and labor practices in the business operations and activities of the Company, its subsidiaries and affiliates.
2. Oversee business operations to ensure compliance with applicable laws, regulations and relevant policies.

Management

1. Establish and develop practices that are consistent with and appropriate to the Company's business context, and uphold and comply strictly with relevant policies, procedures, requirements and laws.
2. Promote, support and cultivate awareness and adherence among employees at all levels to human rights principles and fair labor practices, in alignment with the Company's business operations.
3. Supervise, monitor and evaluate compliance with this Policy and these practices on an ongoing basis, while developing and improving processes for greater efficiency, including arranging appropriate reporting of performance under relevant policies, practices and regulations.
4. Periodically review and improve human rights and labor practices policies and practices to ensure alignment with laws, regulations, requirements and relevant practices that are continually changing.

Employees

1. All employees must study, understand and comply strictly with laws, regulations, rules, relevant standards, and the Company's policies and practices.
2. Respect the rights, dignity and equality of colleagues, business partners, customers and all stakeholders without discrimination, harassment or violation of rights in any form.
3. Perform duties fairly and transparently, and do not support the use of illegal labor, forced labor, child labor or unfair labor practices.
4. Avoid any action or decision that may cause human rights violations or create risks for the Company.
5. If any human rights violation is observed or suspected, or if any wrongdoing or act that may constitute a breach of this Policy and these practices is found, report the information or submit a complaint through the whistleblowing channels under the Company's whistleblowing policy and practices.

5. Human Rights Practices

Practices toward Employees

1. Recruitment and employment shall be based on equality, non-discrimination, and consideration only of qualifications relevant to the position. The Company shall not employ illegal underage labor and shall not be involved in human trafficking or the use of forced labor as prescribed by law.
2. The Company prohibits the employment of child labor by establishing criteria and minimum age requirement for employment in compliance with labor protection laws and international human rights standards, including United Nations Guiding Principles on Business and Human Rights (UNGPs) and International Labour Organization (ILO) conventions. These measures aim to prevent all forms of child exploitation and avoid business activities that could negatively impact children's physical and mental development or educational opportunities. The Company also

requires business partners to adhere to these practices, in order to conduct business that respects children's rights and to support their sustainable growth and development.

3. Treat all employees equally and refrain from any act that may cause discrimination or unfairness arising from bias unrelated to work.
4. The Company promotes a safe working environment for female employees that is not harmful to health and does not create risks for pregnant employees. It also protects their rights and provides full legal benefits, and shall not use pregnancy as a reason for termination, demotion or reduction of remuneration.
5. The Company promotes the rights of persons with disabilities and supports employment in appropriate positions, while providing a working environment that facilitates equal work performance. Employment of persons with disabilities shall comply with relevant laws, and where the Company is unable to employ persons with disabilities, it shall make contributions as required by law in full.
6. Set rest periods, working hours and overtime hours in compliance with labor laws by establishing maximum working hours and limiting overtime hours within the legal framework. The Company aims to continuously reduce excessive working hours, prevent unnecessary overtime, and protect employees' health, safety and appropriate wellbeing.
7. Determine remuneration on the basis of fairness and equality, taking into account performance, experience and capability without gender discrimination. The Company shall comply strictly with labor laws and other relevant laws in setting remuneration at or above the legal minimum, and shall provide social security, welfare and benefits as required by law. The Company also supports remuneration that is sufficient and appropriate for living, taking into account the country's economic conditions and cost of living.
8. Promote diversity and respect differences among all employees to create an equal working environment where people coexist with mutual respect. The Company respects the right to engage in religious and cultural activities and does not discriminate on the basis of race,

religion, gender, age, sexual orientation, disability, nationality or any other status protected by law.

9. Promote a workplace free from sexual harassment and all forms of harassment, whether verbal, physical, by gesture or through online media. All employees should treat one another politely, honorably and respectfully, and refrain from any act or behavior that may cause discomfort, insecurity or affect another person's human dignity.

Practices on Safety, Occupational Health and Employment

1. The Company places importance on and promotes the management of safety and occupational health for employees, contractors, stakeholders, the Company's assets, related companies and the supply chain, in order to conduct business safely and sustainably.
2. The Company provides a safe, hygienic and appropriate working environment, and establishes preventive measures and a systematic and effective safety risk management system.
3. Employees, contractors and workers performing work for the Company must strictly comply with applicable laws, requirements and standards on safety and occupational health.
4. International standards on safety and occupational health, and the Company's safety regulations, shall be applied as guidelines for work performance to continuously enhance safety standards.
5. The Company focuses on preventing and reducing risks from accidents, injuries and health impacts arising from work, with regular monitoring, evaluation and improvement of safety measures.

Practices toward Business Partners

1. Clearly communicate and disseminate the Company's Human Rights Policy to business partners.
2. Require business partners to strictly comply with the human rights principles and commitments specified in the Company's Supplier Code of Conduct.

3. Prohibit business partners from using illegal labor in any form, as specified in contracts and supplier practices.
4. Promote and support business partners in conducting business ethically and recognizing the importance of respecting human rights.

Practices toward Customers

1. Oversee the Company's activities throughout the value chain to ensure that they do not cause negative impacts on customers and do not violate human rights.
2. In the event of negative impacts, the Company shall provide appropriate and fair remediation to affected customers.
3. Respect and protect customers' privacy rights, including personal data, by complying with relevant laws and standards.

Practices toward Communities

1. Respect the rights, freedoms and opinions of community members, especially vulnerable groups, minorities, and ethnic groups or Indigenous peoples.
2. Conduct business with due consideration for, and prevention of, negative impacts that may arise on the economy, natural resources, environment, ecosystems, culture, society, way of life, health, safety, privacy and human rights of community members.
3. Arrange human rights impact assessments covering health, environmental and social matters to support decision-making before investment, mergers and acquisitions, or project implementation in community areas.
4. Conduct processes related to communities transparently, fairly, without discrimination, and in compliance with applicable laws.
5. Support the equitable improvement of quality of life for communities and society without discrimination; support access to educational opportunities; promote youth employment, such as internship programs, work-based learning and recruitment of new graduates into the labor

market; develop vocational skills; and provide suitable job positions to enhance experience and entry into the labor market.

Practices toward Shareholders

1. The Company respects and protects the fundamental rights of all shareholders equally and fairly, without discrimination on any grounds.
2. The Company discloses accurate, complete, transparent and timely information so that shareholders can exercise their rights and make informed decisions.
3. The Company arranges shareholders' meetings through a fair and transparent process in accordance with the law, and provides opportunities for shareholders to ask questions, express opinions and vote independently.
4. The Company manages its affairs in accordance with good governance principles, taking into account the best interests of shareholders as a whole, and shall not take any action that may violate shareholders' rights.
5. The Company provides channels for receiving complaints or suggestions from shareholders and considers them fairly, transparently and appropriately.

Practices on Personal Data

1. The Company respects the privacy rights of data subjects. The collection, use, disclosure or any other processing of personal data must comply with relevant laws and be supported by an appropriate lawful basis or lawful consent.
2. The Company establishes adequate and appropriate personal data security measures, as well as systematic criteria and processes for data management, to prevent unauthorized access, use, disclosure, alteration or destruction of data.
3. The Company respects and protects data subjects' rights as prescribed by law, and provides convenient channels for data subjects to exercise such rights appropriately and fairly, including the rights to access, rectify, erase, destroy, restrict or object to the processing of personal data.

6. Remedial Measures

- 6.1 The Company is committed to preventing, reducing and eliminating risks of human rights violations arising from its business operations, and to establishing appropriate preventive and mitigation measures.
- 6.2 The Company provides a whistleblowing process and grievance mechanism to enable stakeholders to report violations conveniently, safely and confidentially.
- 6.3 In the event of an allegation or incident of human rights violation, the facts shall be investigated by an officially appointed committee.
- 6.4 If it is proven that the Company is involved, the Company shall implement fair remedial and compensation measures, such as medical treatment, damage compensation and other necessary support, and shall establish measures to prevent recurrence.
- 6.5 All reported cases shall be investigated carefully, transparently and fairly. If a violation is found, a corrective action plan shall be prepared and implemented in good faith to ensure that affected persons receive effective remediation.

7. Penalties

Directors, executives and employees of the Company who commit human rights violations, including discriminatory or harassing conduct, shall be deemed to have violated the Company's Business Code of Conduct and shall be subject to disciplinary action in accordance with the prescribed regulations, and may also be subject to legal penalties if the act is unlawful.

8. Whistleblowing

- 8.1 The Company places importance on and continuously monitors respect for human rights and shall not ignore any act that may constitute a rights violation involving the Company.
- 8.2 If any human rights violation is observed or there is reasonable suspicion of such a violation, it must be reported immediately to the supervisor or responsible person, and cooperation must be provided in the fact-finding process.

8.3 If there is any question regarding practices or operations, employees should inquire or consult with their supervisor or the relevant department through the channels designated by the Company.

8.4 The Company provides convenient, safe and effective whistleblowing and complaint channels, as well as an appropriate process for reviewing and escalating complaints.

8.5 The Company protects whistleblowers and persons who cooperate by maintaining confidentiality, ensuring fairness, and preventing retaliation or harassment, in accordance with the Company's Whistleblowing Policy.

9. Policy Review

The Company shall review the Human Rights Policy annually or upon significant events to ensure it remains aligned with laws, international practices and/or the business environment. The Company also provides channels for all stakeholders to report whistleblowing matters or complaints, together with supporting details and evidence, through the following channels:

Prima Marine Public Company Limited

Address: 80 Bangna-Trad 30, Debaratna Road, Bangna Tai Sub-district, Bangna District, Bangkok 10260

Telephone: (662) 016-0190 Fax: (662) 016-0199

Email: comsec_pr@primamarine.co.th

Website: <https://www.primamarine.co.th/th/contact-us>

This Policy shall be effective from 14 May 2026 onwards.

-Signature-

(Mr. Bowon Vongsinudom)

Chairman of the Board of Directors

Prima Marine Public Company Limited