HUMAN RIGHTS & LABOUR PRACTICES

Target and Performance

Long term target by 2030: 100% of business groups conduct annual human rights impact assessments for high-risk organizational activities and direct suppliers.



2025 Performance: Achieved the 2030 target, 100% completing the annual human rights impact assessment for the organization and its suppliers.



100% own operation and value chain was reviewed the human rights impact assessment

100% Salient issued are identified and corrected

100% employee and critical vendor (both tier 1 and non tier 1) are trained the human rights & labour practice policy

100% of tier 1 suppliers are committed to follow the human rights & labour practice policy

100% high risk supplier and vendor are onsite audited and **100%** closed the corrective action

Opportunities and Challenges

Recognizing diversity and respecting the rights of others are essential for any community. Whenever inappropriately communicated and managed can cause the business' operational risk. The Company respects human rights and labour practices in all operations, promoting equality, non-discriminatory and workplace occupational health & safety. This includes preventing human rights violations and protecting the person from discrimination and harassment.

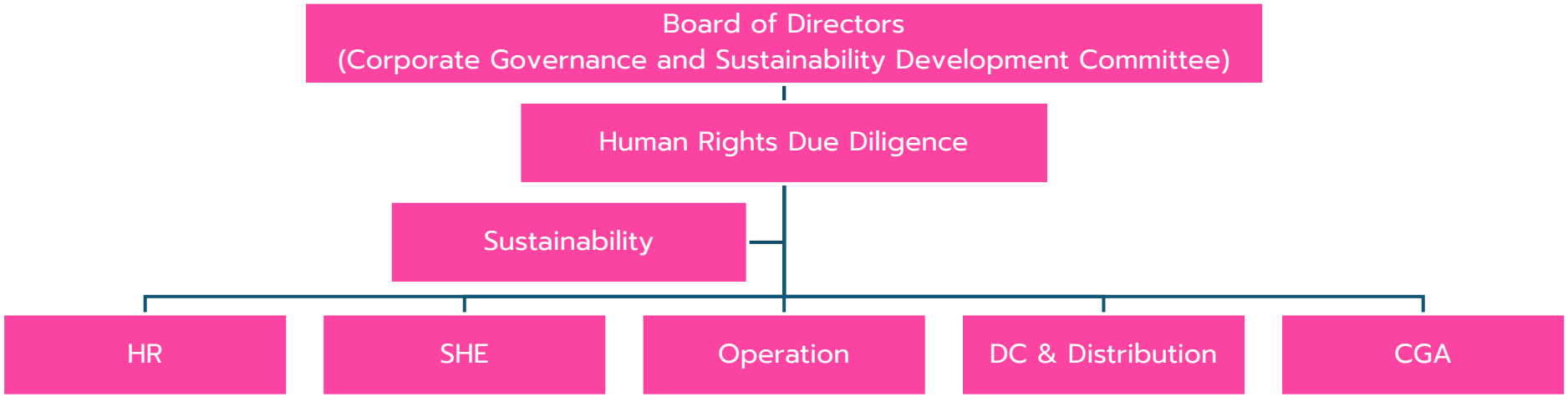
Policy and Management Approach

The company respects human rights and labour practices, such as the Universal Declaration of Human Rights (UDHR), the UN Global Compact, the UN System Code of Conduct, the UN Guiding Principles on Business and Human Rights (UNGPs), and the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), including regulation in all countries where business is operated. The company regularly reviews human rights due diligence and communicates the human rights policies and labour practices to stakeholders.

See more ***Policies and Corporate Document**

Human Rights Due Diligence Working Team

The Human Rights Due Diligence (HRDD) working team to review and driven the policy compliance to the global standard and drive the result performance in human rights, labour practice, occupational health, and safety to be effective within the organization, and among the supply chain and quarterly update the progress to SD steering committee.



Human Rights and Labour Practices Policy

CP Axtra Public Limited Company (the "Company") is committed to respecting fundamental human rights and Labor practices with continuous effort to operate the business sustainably through employees, customers, suppliers, and other stakeholders along the supply chain. The Company aims to protect human rights against discrimination & harassment and also provide equal opportunity for capability development.

The Company respects fundamental human rights and Labor practices in every country where the Company operates and adherences to follow international principles and practices such as the Universal Declaration of Human Rights: (UDHR), the Ten Principles of the United Nations Global Compact (UN Global Compact), UN Guiding Principles on Business and Human Rights (UNGPs), Declaration on Fundamental Principles and Rights at Work and International Labor Organization (ILO).

To prevent any form of negative impact on, or violations of human rights, associated with the Group's operations, products and services throughout the value chains with the guideline practice for.

Respect for Human Rights	Labor Practices Guideline
• Civil and Political Rights • Economic, Social, and Cultural Rights • Gender Rights • Zero Tolerance for harassment and sexual harassment • Community Rights • Human Rights in the Supply Chain • Rights to Land and Natural Resources • Personal Data Privacy Rights	• Working Hour, Payment and Fair Treatment • Human Trafficking & Forced Labour • Child, Female and Pregnant, Elderly, Disabled and Migrant Workers • Freedom of Association and Right to Collective Bargaining • Rights to a Decent Working Environment, • Access to Clean Water, and Sanitation and Clean Air • Training • Whistleblowing

This policy applies to the business operation of CP Axtra Public Limited Company and its subsidiaries, own operation and supply chain including supplier, vendor, and partners.

See more ****Human Rights and Labor Practices Policy****

Human Rights Due Diligence Process

Policy Commitment	• Periodically review and update policy to complied with regulation and requirement. • Announce the Human Rights Due Diligence working team which responsible for reviewing policies to ensure alignment with international standards, as well as driving tangible outcomes in human rights, labour practices, and occupational health and safety—both within the organization and throughout the supply chain. Performance results are presented quarterly to the Sustainability Development Committee.
Embedding	• Conduct training to all employees and added in the new employee orientation programs. • Enforce policies and guidelines by integrating to employee remuneration and performance evaluation criteria.
Identify & Assess Human Rights Risk	• Identify and assess risk all our own operations and value chain at least every 2 year or whenever new business unit merging, acquisition, or JV or new facility opening or any change that potential impact to human rights. • Identify and assess all tier 1 suppliers and vendors at least every 3 year. • Identify and assess all new supplier, contractor and vendor.
Integrating to Risk Map	• All salient issue's reviewed and integrated Enterprise risk management process (ERM) as annually basis • Define the root cause and proper action.
Tracking Performance	• Monitor performance as quarterly basis in Risk steering committee and Audit committee (Board level). • Follow-up action and performance of high-risk suppliers in every quarter.
Validation by third party	• External audit (see assurance letter at link CIN template)
Stakeholder Engagement	• Engage during human rights impact assessment and onsite audit. • Supplier development program. • Disclosure performance in The Company's Annual Report.
Remediation and Grievance Mechanism	• Develop a rights-based approach for complaints channels. • Determine the remediation for salient issues.

Human Rights Assessment

In 2025, The Human Rights Due Diligence committee conducted the Human Rights Risk Assessment (HRRA) to review the potential risk that related to our operation including new business and operation which is retail business unit, migrant worker in store operation and potential impact to rights of indigenous people. The **16** concerned issues are identified, **7** Silent Human Rights Issues. **2,663** sites implement the mitigation plan (include **167** sites which breach case occurred). These salient issues are reviewed the root cause and periodically follows up on the correction and remedial action for every significate salient issue.

Category	% of total assessed in last three year	% of total assessed where risks have been identified	% of risk with mitigation actions taken
Own operation	100	100	100
Supplier, Contractor & Vendor	100	100	100
Joint ventures	100	100	100



Salient issues have been Identified, assessed and closed all mitigate action



Breach cases are investigated and remediated



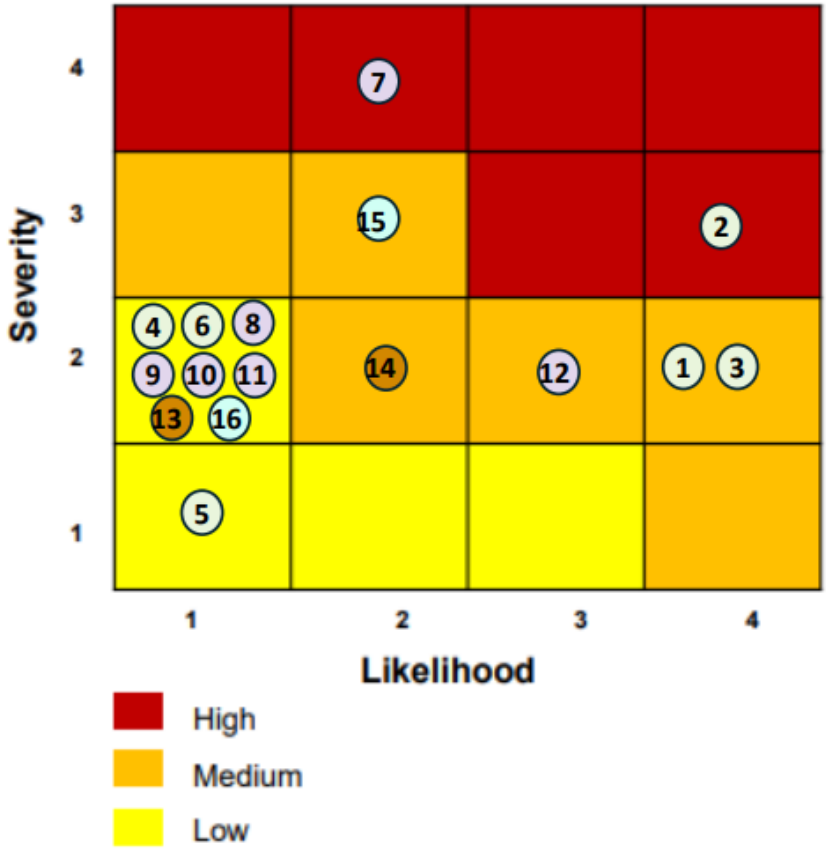
Employee are trained basic human rights in workplace



Supplier and vendor are trained the human rights and labour practice policy

2025 Result of Human Rights Assessment

The **16** concerned issues are identified, **7** Silent Human Rights Issues. 2,663 sites implement the mitigation plan (include 167 sites which breach case occurred). These salient issues are reviewed the root cause and periodically follows up on the correction and remedial action for every significate salient issue.



#	Human Rights Issues
Employee Practices	
1	Working Condition
2	Occupational Health and Safety
3	Discrimination and Harassment Including Equal Remuneration
4	Illegal Forms of Labours
5	Freedom of Association and Right to Collective Bargaining
Supplier and Contractor Practices	
6	Working Condition
7	Occupational Health and Safety
8	Discrimination and Harassment
9	Illegal Forms of Labours
10	Unfair Vendor Treatment in Procurement Process

Community Practices	
11	Health and Safety
12	Standard of Living
Customer Practices	
13	Health and Safety of Customers (Food Safety & Well-being)
14	Discrimination and Harassment
15	Data Privacy Cybersecurity
All Right Holder	
16	Security Management/ Security Forces

2025 Salient Issue & Mitigation

Salient Issue	Potential Impacted Group	Risk Level	Mitigation Action and Result
Health & Safety	Employee Delivery contractor & subcontractor	High	• Enforce the Life Saving Policy, onsite audit and prepare ER plan for transportation • **100%** conduct defensive driving training and testing for all transportation vendor. • **100%** onsite human rights and safety audit to all high-risk vendors and **100%** closed the corrective action request
Discrimination and Harassment	Employee & migrant worker Supplier, contractor & subcontractor Female and non-Binary worker	Medium	• **100%** worker are trained code of conduct and zero tolerance any harassment, the working document or sign board are updated to cover migrant worker language. • **100%** migrant worker received training and development, welfare and protection equal to local employee. • **100%** supplier, vender and subcontractor are trained non-discrimination, diversity and inclusion during annual supplier-vendor engagement meeting.
Equal Remuneration and Standard of Living	Employee & migrant worker Female worker	Medium	• **100%** review migrant worker are paid and welfare equality. • Annual third-party audit for gender equity payment. • **100%** living wage review for staff including migrant worker and indigenous worker
Working Condition, Freedom of association, Right to collective bargaining	Employee & migrant worker Supplier, contractor and subcontractor	Medium	• **100%** implement automatic AI working hour monitoring system to prevent the excessive working hours. • Promote welfare committee activity and engagement program
Forced Labor, Child Labor, Human trafficking and Illegal Form of Labour	Employee & migrant worker Supplier, contractor & subcontractor Women & Children	Medium	• All worker including supplier and vendor are prohibited to use the force labor, child labor, human trafficking and any illegal form of labor • Onsite audit the supplier and vendor to verify all migrant worker are strictly follow the labor regulation.
Food Safety & Well Being, Customer rights (data privacy)	Customer Local community Indigenous people Women & Children	Medium	• Reinforced the data privacy protection and food quality assurance programs. • Enhance the selling of Health promoting product to customer which the result has increased **3%** compared to last year. • Provide health promoting activity for community i.e. Health check-up, Breast cancer screening, Aerobic dance • Support local cultural festivals around the year
Sexual Harassment	Employee & migrant worker female worker, contractor & subcontractor Women, Children	Medium	• **100%** of beach case are investigated, corrected and **100%** completed the remediation within 2 weeks. • **100%** employee are trained and acknowledged sign for the Zero tolerance sexual harassment and harassment and the punishment in employee CoC document. • **100%** employee are trained and acknowledged sign for the Zero tolerance sexual harassment and harassment and the punishment. • **100%** employee including migrant worker are refresh trained the whistle blowing channels as annually basis

Breach case of Human Rights & Labour Practice Monitoring & Action

The Company monitor and disclose the human rights and labour practice performance that cover all own operation, contractors & vendors, and suppliers including the action as

Human Rights and Labour Practices Issue	Issued	Makro	Lotus's (Thailand)	Lotus's (Malaysia)	CP Axtra	Confirmed	Under Investigation	Disciplinary action (if any)					
								Verbal Warning	Written Warning	Training	Suspension / Transfer	Legal Action	Dismissal / Resigned
Discrimination	Case	41	114	37	192	104	7	18	35	27	1	0	17
Child and Youth Labour	Case	0	0	0	0	-	-	-	-	-	-	-	-
Force Labor	Case	12	33	0	45	25	3	5	9	9	0	0	0
Sexual Harassment	Case	0	3	0	3	2	0	0	1	1	0	0	0
Harassment	Case	33	99	1	133	96	9	23	38	29	1	0	1
Indigenous's rights	Case	0	0	0	0	-	-	-	-	-	-	-	-
Freedom of association rights	Case	0	0	0	0	-	-	-	-	-	-	-	-
Fine & Penalty	Baht	-	-	-	-								
Closed Action of Substantiated Cases	%												

In 2025, 227 cases are confirmed and every case has the action and penalty as guided in human rights and labour practice policy, company's rule and regulation.

Remediation Process



Example of Remediation Action

- Overtime compensation
- Retroactive salary adjustment and bonus payment

total remediation amount of 157,230.5 Baht

Human Rights Policy and Non-Discrimination Online Training

Human Rights and Labour Practices Policy and Guidelines has been conducted training to all employee and manager to emphasizing respect for human rights, labour practices, diversity, and inclusion behaviour including zero tolerance policy for any form of harassment and sexual harassment and expanded these trainings to the Company's supply chain.





2025 Performance

100% of new employee, employee, supplier, and vendor are trained the human rights & labour practice policy, prevention of discrimination, harassment and sexual harassment.

100% of supplier have been advised to apply human rights & labour practices

Diversity & Inclusion, Non-discrimination and Gender Equality

"At CP Axtra, we respect the individuality of every employee and embrace inclusive hiring practices, grounded in equality and gender diversity. We believe that diversity unlocks limitless potential—empowering both our people and our organization to thrive."

The company respects diversity and inclusion where employees, worker, supplier and vendor are treated with fairness, without any discrimination from the race, nationality, skin colour, ethnicity, religion, social status, gender, age, physical features or disability, political belief and marital status. Proven by Winning the 1st of 2024 the Asia-Pacific and Thailand WEP Award: Transparency & Reporting to Promote Gender Equality and Honorable Mention for The Community Engagement and Partnerships.

Target: **Women in STEM-related position above 50% by 2030**

2025 Result:

57% Women in total workforce
58% Women in management position (first level, middle and top)
47% Women in Top management
55% Women in Middle management
60% Women in first management
57% Women in revenue generating function
47% Women in STEM* related position

*Note: * STEM : STEM : Science, Technology, Engineering and Mathematics*

WEPs AWARDS
TRANSPARENCY & REPORTING
For exemplary practice embracing the Women's Empowerment Principles (WEPs) in Asia-Pacific

WEPs AWARDS
COMMUNITY ENGAGEMENT & PARTNERSHIPS
For exemplary practice embracing the Women's Empowerment Principles (WEPs) in Asia-Pacific



Gender Pay Indicators

The Company also conducts equal payment analysis to ensure that both men and women are paid equally fair, including the annual reviewing for compensation and benefits at competitive rates with benchmarking in the same industry and leading company. The data are also verified by Third party as the Assurance letter on last page of SD report)

Level*	Payment Ration by Gender (Female: Male)	
	2024	2025
All Employee (Based Salary Only)	0.99 : 1.00	0.95 : 1.00
All Employee (Based Salary + Other Cash Incentives)	0.97 : 1.00	0.94 : 1.00
Executive Level (Based Salary Only)	0.77 : 1.00	0.73 : 1.00
Executive Level (Based Salary + Other Cash Incentives)	0.69 : 1.00	0.70 : 1.00
Management Level (Based Salary Only)	0.90 : 1.00	0.89 : 1.00
Management Level (Based Salary + Other Cash Incentives)	0.89 : 1.00	0.89 : 1.00
Non Management Level (Based Salary Only)	1.02 : 1.00	1.02 : 1.00
Non Management Level (Based Salary + Other Cash Incentives)	1.00 : 1.00	1.00 : 1.00

Gender Payment Indicators*	% Difference Between Male and Female	
	2024	2025
Mean gender pay gap = [Male's mean payment - Female's mean payment] / Female's mean payment	1.33%	4.90%
Median gender pay gap = [Male's median payment - Female's median payment] / Female's median payment	-2.79%	-1.89%
Mean bonus gap = [Male's mean bonus - Female's mean bonus] / Female's mean bonus	-1.30%	4.77%
Median bonus gap = [Male's mean bonus - Female's median bonus] / Female's median bonus	-3.20	-4.76%
** Coverage : cover all employees at every levels (100%)*		

Facility and Supporting for Diversity and Inclusion



Parking and toilet for wheelchair users

100% of store and head office have the parking lot, sloping and toilet for wheelchair and older person



Lactation Rooms

100% of store and head office have the Lactation rooms



Prayer rooms for Religions

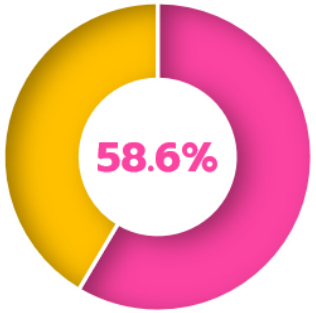
100% head office provides space and time for religious ceremonies

Support Women Own Business in Supply Chain

According to the successful integrating the principles of human rights, equality, and non-discrimination to daily operation and year 2022, the company achieved the first prize for Thailand WEP Award - category of Gender-Inclusive Workplace category and 2024, achieved first prize of Asia Pacific Region – category of Transparency and Reporting

- In 2025, CP Axtra's 360° Inclusive Procurement: Equality, Empowerment & Protection Project is successful drive ratio of women business owner in our supplier chain to 58.6% female to prove the compliance to the Women's Empowerment Principles (WEPs), for promote fair practices towards women and aim to enhance gender equality throughout the supply chain. The Company collaborate with partner i.e UN Women, SEC to sharing the best practice for integrate the human rights and gender equality to procurement and supplier selection process through the fairness and non-discrimination.

Women Business Owner in Our Supply Chain



Australian Government
Department of Foreign Affairs and Trade



Support and Develop in Community

The Company continues the project to supports and develop women and vulnerable group in community to upskill and earn the money to support themselves and families such as Koo-Kid Kon Mee Fun (Dreamers' Partner)



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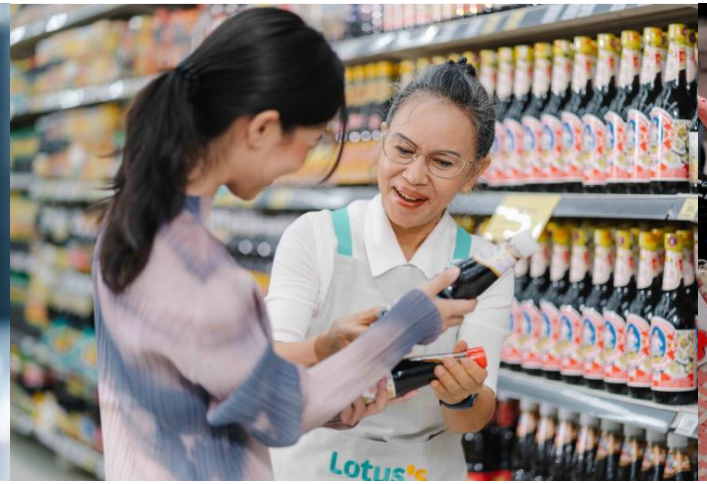
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Click here to watch: หนังชีวิต "แม่อ้อย" | อีจัน EJAN

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HR Asia Best Companies to Work for in Asia 2025 Award– 3 consecutive years

The company is committed to conducting business with alignment to human rights and fair labour practices. We promote equal and fair treatment of fundamental rights, aiming to foster a workplace where every employee enjoys a meaningful and empowering experience. By continuously enhancing employee skills and capabilities, we create growth opportunities that align individual development with organizational success—driving sustainable progress toward our shared goals.



The UN Women – Winner of WEPs Awards of Asia-Pacific and Thailand

In 2024, the company was honoured with the Winner Award in the Transparency and Reporting category of the WEPs Awards 2024 by UN Women. This prestigious recognition is awarded to organizations that demonstrate the commitment to tracking performance and progress towards greater gender inclusivity in our business practices with clear targets, regular assessment and reporting of how far we have gone. It also recognizes our corporate initiatives on gender inclusivity known to the public.

(*The WEP Award conducts every 2 years)



Role Model Organization Award -Promoting Employment and Income for Elderly

CP Axtra supports employment and livelihood opportunities for senior citizens through the “Super 60” project, encompassing three key programs:

1. Senior Employment Program: Hiring elderly citizens to take on roles at Makro and Lotus’s stores.
2. Senior Entrepreneur “Tao Kae Wai Gao”: Vocational training and income-generation support for seniors seeking freelance work or operating their own businesses.
3. Happy Elderly Market “Talad Suk Jai Wai Gao”: Providing free booth space at Makro and Lotus’s for elderly vendors to sell their products without incurring any fees.

This project reflects the our unwavering commitment to creating inclusive economic value and delivering positive social impact. In recognition of these efforts, the Company was named a Model Organization for Promoting Employment and Income Generation for the Elderly Award, awarded by the Director-General of the Department of Older Persons, Ministry of Social Development and Human Security.

Click: ลองดูคลิปนี้ให้จบ... แล้วคุณจะรู้ว่า “60ยังแจ๋ว” หน้าตาเป็นยังไง 😎 ❤ ยั... | TikTok









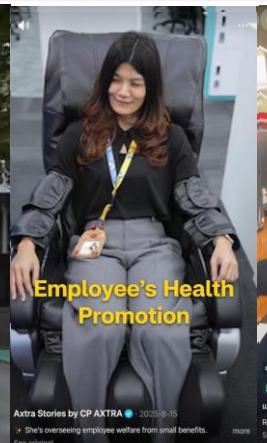
Labor Practices Programs

Initiatives	Actions	Result
Ensure adequate wages at or above cost of living estimates or benchmarks	**Living Wage Commitment:** The Company commits to assess living wages for all employees, contractors, and suppliers by 2025, ensuring income levels support basic cost of living requirements. • **Anker Methodology:** Uses a 3-step calculation process: (1) determine household living costs including food, housing, essentials, and emergencies, (2) divide by number of workers per family for net wage, and (3) add taxes and deductions for gross living wage.	• **100%** Staff are assessed. • **100%** Contracted worker are assessed. • **100%** Critical suppliers are assessed. • **100%** Staff income are corrected to meet the Gross living wage.
Monitor working hours including overtime management	**AI Working hour Tracking System**: In 2025, the Company implements the AI automated Work scheduler, this system automatically monitored, notified and blocked assignment If working hours and OT potential approach the limit. This's proactive measure strictly manages excessive working hours and adequate rest During weekend for all employees. 	• **100%** of employees are covered by the automated working hours and overtime monitoring system. • **0%** of employees exceeded the legally maximum working hour limits. 
Ensure employees are paid for overtime work	**Provision for overtime work:** providing the fair compensation for overtime hours in accordance with labor laws, ensuring employees are properly remunerated with monthly internal audit, all employee get payment document for own reviewing also provide the feedback channel if they suspect the discrepancy in the calculated amount.	• **100%** coverage of employees who get paid overtime

Labor Practices Programs

Initiatives	Actions	2025 Result
Regularly engage with workers' representatives on working conditions	**Regularly engage with workers' representatives:** The Company ensure that grievances are met and working conditions align with the standards by monthly engaging with employee welfare committee.	• **2,030 employee** are representative in the welfare committee, and 100% quarterly engagement meeting are conducted.
Routinely monitor the gender pay gap to achieve equal remuneration for men and women	**Equal renumerations :** The Company ensures equal pay for female and male who performing roles of equivalent value and responsibility by annually monitor the gender pay gap, verified by external audit and public disclosed. see 2025 assurance letter at link: *CIN template* (GRI 405-2 Ratio of basic salary and remuneration of women to men)	• **Overall Female : Male Pay Ratio:** Females earn **0.99:1.00** (salary) and **0.97:1.00** (with incentives) • **Management Level: 0.90:1.00** (salary) and **0.89:1.00** (with incentives) • **Non-Management: 1.02:1.00** (salary only)
Expand social protection coverage for workers beyond public programs	**Enhanced Social Protection & Financial Security:** The Company providing comprehensive group health and life insurance for employees beyond the regulation. Furthermore, the Company offers enhanced maternity and paternity leave that exceed legal requirements, provides a Provident Fund to ensure long-term financial security after retirement and scholarship for employee themselves or their children-adult children. Also given stock to employee through Employee Joint Investment Program (EJIP), Mobile Dental Clinic Service, Full Time Doctor & Nurse etc.	• **100%** of full-time employees are covered by comprehensive group health and life insurance beyond public programs. • **100%** of eligible employees are offered participation in the corporate Provident Fund for retirement security.













Labor Practices Programs

Initiatives	Actions	2025 Result
Ensure employees are taking their paid annual leave entitlements	**Annual paid leave**: The Company provides comprehensive annual leave entitlements that comply with statutory requirements, allowing employees adequate time for rest, personal matters, and vacation while maintaining operational continuity and supporting employee well-being.	• **100%** coverage of employees who get annual paid leave
Provide training or reskilling to mitigate negative effects of industrial or climate transition changes	**Reskilling & Internal Mobility Programs:** To mitigate negative employment impacts (job loss, skill redundancy) caused by the retail industry's transition towards automation. The Company proactively reskills at-risk employees such as a) Digital Reskilling- partner with experts (i.e Skooldio, LinkedIn etc.) to equip affected employees with AI and data analytic skills, transitioning them from repetitive manual tasks to higher-value roles. b) Cross-Functional Transition- Employee at risk of skill redundancy are integrated into agile project teams, allowing them consider and apply the new position i.e data analytics, online marketing, food expert etc. c) Change Management- mandate the 'Dealing and Managing Change' leadership course for smooth adaptation through the rapid technological and industrial shifts.	• **100%** of employees directly affected by process automation are participated in the digital reskilling program. • **100%** employee participate climate resilience training












Example of Employee Club and Event from Welfare committee engagement









Comprehensive Health Protection

Beyond public social and health program, the Company voluntarily provides a robust, fully-funded on-site healthcare ecosystem featuring a dedicated Group health insurance including **On-site Daily Medical Clinic** and a **Mobile Dental Clinic**. While local regulations only mandate part-time doctor visits, our on-site clinic is staffed by full-time doctors and registered nurses every working day at our headquarters entirely free of charge with zero out-of-pocket costs. initiatives by allowing employees to receive this professional medical and dental care during regular working hours as fully paid time off, with absolutely no deduction to their wages or leave entitlements. this comprehensive on-site program transforms standard workplace first-aid into an inclusive, corporate-funded healthcare network and long-term well-being.







Employee Joint Investment Program (EJIP)

To foster long-term employee retention and align the workforce with the company's business growth strategic and sustainability goals, the Company has implemented a comprehensive Performance Share Unit (PSU) plan as part of Employee Joint Investment Program (or called EJIP), covering a significant percentage of our employees below the senior management level. These grants possess a three-year vesting period based on the achievement of defined corporate performance targets, which include specific business and sustainability KPIs.
Distinctively, upon vesting, the EJIP, the Company provides an additional matching contribution towards employees' voluntary, also dividend payment every 6 months. This private supplementary retirement savings or enhanced financial insurance funds also proactively expands social protection coverage for our employee beyond mandatory public programs.

