



Human Rights Policy

AIM REIT Management Company Limited
AIM Real Estate Management Company Limited

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1. Introduction

AIM REIT Management Company Limited and AIM Real Estate Management Company Limited (collectively referred to as the “Company” or “REIT Manager”) as the REIT Manager of AIM Industrial Growth Freehold and Leasehold Real Estate Investment Trust (“AIMIRT”) and AIM Commercial Growth Freehold and Leasehold Real Estate Investment Trust (“AIMCG”) (collectively referred to as the “REIT”), have established respect for human rights as a core principle in their business operations, adhering to the Universal Declaration of Human Rights (UDHR) and the United Nations Guiding Principles on Business and Human Rights (UNGPs) as frameworks for operations within the REIT’s structure. The REIT focuses on investing ready-to-generate-income assets through the acquisition of ownership or leasehold rights, rather than acting directly as a real estate developer.

However, the REIT serves as a vital investment mechanism with a significant economic role in enhancing liquidity for property developers, thereby supporting continuous investment and development of new projects. The investment in, management of, and the benefit procurement of REIT assets contribute to continuous employment generation in the areas where the assets are located. This is achieved through management and related support services such as asset management, security, cleaning service, and building systems maintenance. This can generate income for local workers and entrepreneurs while indirectly supporting public revenue collection.

The REIT Manager recognizes that the benefit procurement process and its associated supply chain may harbor human rights risks across multiple dimensions, such as safety standards and working conditions within the supply chain, as well as the rights of communities surrounding the REIT’s invested assets. Without appropriate oversight, this could adversely impact stakeholders and erode investor confidence.

Therefore, the REIT Manager has established this Human Rights Policy to serve as a framework for managing and monitoring human rights risks associated with the REIT’s operations under its management. This policy is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), which consist of three core principles: Protect, Respect, and Remedy. The REIT Manager has voluntarily adopted these principles to promote responsible, transparent, and sustainable business practices.

2. Scope

This Human Rights Policy applies to all directors, executives, and personnel of the REIT Manager, and encompasses the operations and key individuals within the REIT’s supply chain, such as the REIT’s tenants, property managers, surrounding communities, and business partners etc.

Target groups	Scope of Application
Trust Unitholders	The trust unitholders of the REIT, including both retail and various financial institution.
Internal Personnel	Employees at all levels and under all types of employment (permanent/temporary) of AIM REIT Management Company Limited and AIM Real Estate Management Company Limited
Property Managers and Business Partners (Outsource)	Appointed property managers, consultants in various fields, service providers, including the personnel, employees, staff, and representatives of the aforementioned parties
Tenants and Customers	Tenants and service receivers within the properties invested in by the REIT, including the personnel, employees, staff, representatives, customers, and visitors of the aforementioned parties
Vulnerable Groups	Individuals who may be more susceptible to impacts, such as women, children, people with disabilities, the elderly, and migrant workers.
Community	Communities surrounding the locations of the assets invested by the REIT.

3. Guidelines

The REIT Manager is committed to conducting business while upholding the principle of respect for human rights across all stakeholders involved in the REIT's operations, particularly property managers and workers in the supply chain. Although the REIT Manager does not manage the assets directly, it has established clear standards and practices within the Property Management Agreement to ensure adherence, and communicates its expectations regarding human rights to all relevant parties for appropriate implementation.

3.1 Guidelines for Treating Trust Unitholders

As the REIT Manager, the Company considers the trust of the unitholders to be the heart of its business operations. We recognize that all trust unitholders are entitled to equal and fair treatment in accordance with international human rights principles. Therefore, the Company is committed to operating with transparency and without discrimination, and to fully safeguarding the rights and benefits of trust unitholders to foster sustainable growth and deliver shared value to all stakeholders.

3.1.1 Respect for Fundamental Rights and Equal Treatment of Trust Unitholders

Equality: The REIT Manager focuses on treating all trust unitholders fairly and equally, regardless of whether they are major or retail investors , and without discrimination based on race, religion, gender, age, or social status.

Right to Access Information: The REIT Manager provides diverse and easily accessible communication and information channels, such as the REIT's website, the SET's website and disclosure system, and online platforms etc. Information is presented in various formats, such as presentation and video clips.

3.1.2 Rights to Participate and Make Decision

Facilitating the Exercise of Rights: The REIT Manager will organize trust unitholder meetings and two-way communication on dates, times, and locations convenient for travel to promote comprehensive participation.

Freedom of Expression: Providing opportunities for trust unitholders to freely ask questions and express opinions, supported by an effective process for listening and responding to feedback.

3.1.3 Protection of Personal Information

The REIT Manager strictly adheres to maintaining confidentiality and protecting the personal data of trust unitholders in accordance with relevant laws, ensuring data is not misused or disclosed to third parties without permission, in compliance with the REIT Manager's Personal Data Protection Policy.

3.2 Guidelines for Treating Personnel within the Organization

The REIT Manager recognizes and respects the human rights of all personnel directly employed by the REIT Manager, focusing on building an organizational culture based on equality and free from discrimination, harassment, or bullying of any kind. Furthermore, it strictly complies with labor laws and international standards, maintaining a policy of non-support for child labor, illegal labor, forced labor, and all forms of human trafficking. It also ensures personnel receive appropriate benefits and compensation aligned with the cost of living, while promoting potential and sustainable career growth.

3.2.1 Fair Employment and Non-Discrimination

Equal opportunities: Processes from recruitment, selection, performance evaluation to promotion will primarily consider knowledge, ability, and potential, free from bias based on gender, age, religion, disability, or sexual orientation.

Compensation and Benefits: Determining appropriate and fair wages, providing holidays, leave, and welfare benefits that are no less than those required by law.

3.2.2 Respect for Workplace Rights and Privacy

Freedom of Expression: Supporting freedom of communication, negotiation, and constructively suggesting guidelines to improve working conditions

Protection of Personal Data: Protecting employees' personal data in accordance with the law and respecting privacy by not unnecessarily intruding into personal lives.

Freedom of Association: Employees have the right and freedom to form or join associations, organizations, or any lawful form of assembly, including engaging in lawful collective bargaining for mutual benefits, without affecting their employment status and without leading to any penalty, intimidation, harassment, or dismissal.

3.2.3 Occupational health, safety, and work environment

Workplace Safety: Providing an appropriate working environment to mitigate physical and mental health risks, and maintaining a zero-tolerance policy against all forms of employee harassment, whether verbal, physical, or sexual.

Good Quality of Life: Emphasizing appropriate workloads for employees and implementing flexible working policies, including the use of technology and computer systems to support work and reduce unnecessary overtime.

3.2.4 Women's Rights

The REIT Manager prioritizes the well-being of pregnant employees and mothers by providing statutory maternity leave rights, without impacting their employment status or career growth opportunities. It also considers providing appropriate environments, such as child care or nursing areas, and flexible work arrangements as necessary.

3.3 Guidelines for Treating Property Managers and Business Partners

The REIT Manager recognizes that property managers and relevant business partners are a critical part of the REIT's supply chain and emphasizes communicating the human rights policy to property managers to ensure trust unitholders' investments do not support human rights violations. The REIT Manager requires property managers appointed under the Property Management Agreement to certify that they will not violate human rights principles and will strictly comply with relevant labor laws, covering at least the following essentials:

1. Provide appropriate and safe working and living conditions for property managers' employees.
2. Guarantee rights under labor law, including wages, working hours, leave entitlements, and legal welfares.
3. Do not use child labor
4. Do not use undocumented foreign labor.
5. Do not use forced labor or engage in any form of human trafficking.
6. Treat employees equally, without discrimination, harassment, or bullying.

Additionally, property managers are also required to submit monthly accident statistics occurring within the REIT's invested assets under their management. .

For business partners, the REIT Manager has a policy of not supporting those with a history of using forced labor, child labor, or discrimination. Business Partners are screened via a REIT's questionnaire regarding the human rights policy of business partners, and are required to certify they will not violate human rights principles and will strictly adhere to relevant labor laws, in the same manner as property managers.

In addition, the REIT Manager has established a whistleblowing channel allowing employees of the property managers and/or business partners to report human rights violations directly to the REIT Manager. This channel includes measures to protect whistleblowers, as detailed in the Whistleblowing Policy.

3.4 Guidelines for Treating Tenants and Customers

The REIT Manager aims to ensure the safe and hygienic utilization of the REIT's assets, prioritizing building safety and environmental maintenance within the projects invested in by the REIT to make tenants feel safe when using the leased assets.

3.4.1 Building safety and health standards

Safe Environment: The REIT Manager requires regular inspections and maintenance of building engineering systems, fire protection systems, and the asset's structure to ensure the maximum safety for the lives and assets of tenants and customers in both leased and common areas, and to implement cleanliness and sanitation measures that comply with building standards and public health regulations to minimize health risks and create an environment that promotes good quality of life in the use of leased assets by tenants and customers.

3.4.2 Respect for Privacy and Equal Treatment

Personal Data Protection: The personal data of tenants and service receivers are protected in accordance with the law and will not be misused.

Equal Treatment and Non-Discrimination: Ensuring that personnel working within the projects treat customers and service users with courtesy and respect for human dignity, without discrimination based on gender, age, religion, disability, or social status.

3.4.3 Fair Complaint Mechanism

Provide a channel for reporting incidents or complaints regarding human rights violations or unsafe conditions in areas invested in by the REIT. Provide a mechanism for fact-finding and proper complaint management, alongside a rapid process for monitoring and remedying impacts.

3.5 Guidelines for Vulnerable Groups

For activities related to the REIT's assets, the REIT Manager prioritizes operating with consideration for the rights and dignity of vulnerable groups. These are individuals or groups who may be more easily or severely affected by business activities than others due to physical, social, economic, or legal limitations, such as women, children, persons with disabilities, migrant workers, and the elderly etc. The REIT Manager has implemented operations and established guidelines for property managers to follow

1. Provide appropriate safety, hygiene, and environmental measures for vulnerable groups, such as implementing a clear and easily understood system of symbols and communication.
2. Manage, resolve, and remedy any impacts that arise appropriately, fairly, and promptly, giving primary consideration to the vulnerability level of those affected.
3. Avoid any actions that may cause discrimination, stigmatization, or the violation of human dignity against individuals or vulnerable groups in any form.

3.6 Community Practices

The REIT Manager respects the rights, dignity, and way of life of the communities around the REIT's assets, understanding that the utilization of assets may cause direct and indirect impacts on the community without appropriate management.

The REIT Manager requires the property managers to operate with consideration for harmonious and sustainable coexistence with the community through the following practices:

1. Respect community rights regarding land, natural resources, environment, and health by avoiding or preventing activities that may cause pollution, noise, or inappropriate environmental and social impacts.
2. Provide clear and easily accessible channels for communication, receiving feedback, and complaints from the community to acknowledge concerns and apply them toward appropriate operational improvements.
3. Support the creation of shared value with the community, such as promoting local employment, using local business services, and supporting beneficial community development activities as appropriate.
4. In cases where operations impact the community, the REIT Manager will oversee fact-finding investigations and execute corrections or impact remedies fairly, transparently, and in alignment with human rights principles.

4. The Mechanism For Receiving Complaints about Human Rights Violations and Providing Remedy.

The REIT Manager provides an appropriate and effective complaint and remedy mechanism aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs). This ensures all stakeholder groups in the REIT's value chain can access and exercise their right to complain when they suffer or may suffer human rights impacts from operations related to the REIT.

This mechanism covers all stakeholders, including trust unitholders, company personnel, property managers and business partners, tenants and customers, as well as communities and vulnerable groups, based on the following core principles:

1) Principle of Accessibility

Provide diverse, appropriate, and uncomplicated complaint channels, considering language, physical, and social limitations, ensuring equal access for all stakeholder groups, especially vulnerable groups.

2) Principle of Fairness and Non-discrimination

Complainants will be treated fairly and free from discrimination, harassment, or retaliation in any form.

3) Principles of Transparency and Process Integrity

The Company will establish appropriate procedures for receiving matters, fact-finding, consideration, and result notification, allowing complainants to reasonably anticipate the process.

4) Principles of Data and Privacy Protection

The Company will maintain the confidentiality and protect personal data of the complainant as required by applicable law.

5) Principles of Correction and Remedy

If a human rights violation or impact is detected, the Company will oversee appropriate and fair corrective actions and remedies consistent with the nature and severity of the impact.

Complaint Process

Complainants can use the mechanism of contact, submit information, and/or reporting complaints through the REIT Manager's website or by emailing the Finance and Investor Relations Department.

Channel 1: The REIT Manager's website

1. AIM Industrial Growth Freehold and Leasehold Real Estate Investment Trust ("AIMIRT") can submit complaints via <https://www.aimirt.com/en/contact/complaint-form>.
2. AIM Commercial Growth Freehold and Leasehold Real Estate Investment Trust ("AIMCG") can submit complaints via <https://www.aimcgreit.com/en/contact-us/complaint-form>.

Channel 2: Email to the REIT Manager

1. AIMIRT accepts complaints via email: ir@aimreit.com
2. AIMCG accepts complaints via email: ir@aimrm.co.th

The Finance and Investor Relations Department, which receives complaints, together with the Legal and Compliance Department, will investigate and analyze the cause of each complaint to determine if the complaint is substantiated or unsubstantiated

Unsubstantiated Complaints

The Legal and Compliance Department will prepare a report of the investigation results and explanations, then submit it to the Chief Executive Officer for approval and signing. The Finance and Investor Relations Department will communicate the investigation results and explanations to the complainant within 30 days.

Substantiated Complaints

The Legal and Compliance Department will inform the Chief Executive Officer and submit the complaint to the Complaint Investigation Sub-committee.

Details regarding the subcommittee for investigating complaints and the procedures for handling them are in accordance with the Whistleblowing Policy.

The REIT Manager has implemented measures to protect complainants and those who cooperate in fact-finding as follows.

Confidentiality

The Company will keep information about complainants and those cooperating in the investigation confidential by limiting disclosure to the extent necessary to handle complaints. The Company will proceed with caution to avoid causing damage to complainants and those who cooperate in the investigation, except where disclosure is required by law, orders of administrative agencies or authorized officials, or court orders.

Protection from Retaliation or Bullying

The REIT Manager shall not engage in any discriminatory, threatening, harassing, or retaliatory acts, either directly or indirectly, against the complainant or the person who cooperates in the fact-finding investigation, such as demotion, job description alteration, dismissal, or any other unfair act. Should such actions have occurred, the Company will take disciplinary action or appropriate measures against the offender strictly.

Remedies for Damage

In the event that the complainant and those cooperating in the fact-finding investigation suffered damage due to unfair acts, the REIT Manager will consider appropriate and fair measures to mitigate or remedy the damage.

The Company will follow up on the results of the complaint and use the information obtained to continuously improve human rights risk management for the trust.

5. Monitoring, Review and Information Disclosure

The REIT Manager will regularly monitor, review, and update this Human Rights Policy as needed to reflect material changes and ensure compliance with applicable laws, international standards, and the REIT's operating context. Relevant performance information will also be appropriately disclosed to promote transparency and stakeholder confidence.