



TRAVELIFE PARTNER · CRITERION 2.4

HR and Labour Policy

Pai Dai DMC

1 Purpose and Scope

Pai Dai DMC (Paidai Online Co., Ltd.) is a destination management company operating in Thailand (Bangkok), serving European wholesale partners with inbound group and MICE travel. This policy sets out the standards Pai Dai applies to its own employment practices. It covers the rights and responsibilities of all Pai Dai staff: permanent, part-time, and contract employees. It consolidates the company's commitments on human rights at work, employment conditions, health and safety, equal opportunities, grievance handling, and disciplinary procedures into a single reference document.

This policy sits alongside the Sustainability Policy and the Environmental Policy as part of Pai Dai's commitment to the Travelife sustainability standard. It is reviewed at least annually by the Executive Board.

2 Commitment to Human Rights and ILO Standards

Pai Dai is committed to conducting its business in a way that respects the fundamental rights of all people it employs. We align our employment practices with:

- The Thai Labour Protection Act B.E. 2541 (and its amendments) for all staff.
- The core ILO Conventions on freedom of association, forced labour, child labour, and non-discrimination.

Where national law or its enforcement falls below the minimum standards set by the ILO, Pai Dai commits to meeting the ILO standard regardless. These commitments apply to all staff regardless of nationality, contract type, or role.

3 Freedom of Association and Collective Bargaining

Pai Dai fully respects the right of all employees to freedom of association: the right to join or form a trade union, to engage in collective bargaining, and to seek representation without disadvantage or penalty. No employment contract at Pai Dai contains any clause that restricts or discourages union membership or collective representation.

In practice, no employees in our Thailand operations have formed or joined a trade union at this stage of the company's development. This reflects the current size and structure of the business, not any policy of restriction. Should any employee wish to associate or bargain collectively, Pai Dai will fully accommodate this and will not take any adverse action as a result.

4 Prohibition of Forced Labour

All employment at Pai Dai is voluntary. Every employee is free to end their employment, subject only to the minimum notice period required under Thai labour law (Labour Protection Act B.E. 2541); notice periods will be recorded in the written contracts now being put in place for all staff (target 31-12-2026). No person is held in employment through debt, retention of identity documents, threat, or any other coercive mechanism. No recruitment fees, deposits, or financial collateral are collected from employees at any stage.

These conditions apply to all staff in Bangkok, including part-time and short-term engagements. They comply with the Thai Labour Protection Act B.E. 2541.

5 Prohibition of Child Labour

Pai Dai does not employ anyone under the age of 18. This minimum working age exceeds the statutory minimum in Thailand (15 years under national law) and exceeds the ILO Convention 138 minimum. Age verification is conducted for every new hire, and no employment contract is offered to anyone below this threshold.

This commitment is consistent with ILO Convention 138, ILO Convention 182, the UN Convention on the Rights of the Child, and the relevant provisions of the Thai Labour Protection Act Chapter 4.

6 Written Employment Contracts

It is Pai Dai's policy that every employee holds a signed written employment contract before commencing work. Contracts set out, at minimum: job title and responsibilities, remuneration and payment schedule, ordinary working hours, leave entitlements, overtime arrangements, notice periods, and the applicable termination conditions. Contracts comply with Thai labour law and meet or exceed ILO minimum standards.

The standard contract template now being put in place (target 31-12-2026) will be reviewed whenever there is a material change in applicable Thai labour law. A signed copy of every employment contract will be held on file as the standard written contracts are issued to all current staff (target 31-12-2026).

7 Fair Wages and Working Hours

Wages. Pai Dai pays all employees a wage at or above the applicable legal minimum wage: the Bangkok daily minimum wage applies to all staff. In practice, pay levels are set at rates appropriate to each role and to the cost of living in Bangkok, exceeding the statutory floor by a meaningful margin. Wages are paid in full, on time, and without unauthorised deduction.

Working hours. Standard working hours comply with the applicable limits under the Thai Labour Protection Act B.E. 2541. Overtime is not routinely required. Where overtime is worked, it is compensated at 1.5 times the regular hourly rate for non-management hourly employees, in accordance with the Thai Labour Protection Act. For salaried staff, overtime arrangements will be addressed individually in writing through the explicit overtime and time-in-lieu clause being written into the standard employment contracts now being put in place (target 31-12-2026). No employee is required to work overtime without agreed, documented compensation.

Leave. Employees receive the statutory minimum paid annual leave entitlement (at minimum 6 working days per year under Thai LPA Section 30) plus applicable public holidays, and statutory maternity and other leave entitlements as required by Thai law.

Social protection. It is Pai Dai's policy to register all eligible employees for, and contribute to, the Thai Social Security Office (SSO), with employer contributions made on time and in full.

8 Equal Opportunities and Non-Discrimination

Pai Dai is committed to equal opportunities in all aspects of employment: recruitment, remuneration, working conditions, training, promotion, and any other employment decision. Discrimination on grounds of gender, race, age, disability, ethnicity, religion or belief, sexual orientation, nationality, pregnancy, or any other characteristic unrelated to the requirements of the role is not tolerated.

This commitment applies to all staff and to the company's hiring and contracting decisions. All recruitment and HR decisions are overseen by CEO Wanwisa Puengsawang. Any behaviour, language, or practice that constitutes discrimination, harassment, or bullying is treated as a disciplinary matter under Section 11 of this policy. These commitments are grounded in the non-discrimination provisions of the Thai Labour Protection Act B.E. 2541 and are consistent with ILO Conventions 100 and 111.

8A Conduct, Confidentiality and Use of Company Resources

Pai Dai expects all staff to act honestly, professionally, and in the company's legitimate interest.

Confidentiality and data. Staff keep confidential all non-public company, client, partner, and supplier information, both during and after employment, and handle personal data in line with the Thai Personal Data Protection Act (PDPA) and client GDPR requirements where relevant.

Substance-free workplace. Staff do not carry out their duties under the influence of alcohol or illegal drugs. Any substance use that impairs the safe or competent performance of work is treated as a conduct matter under Section 11.

Use of company resources. Company equipment, accounts, funds, and materials are used for legitimate business purposes only and are safeguarded against loss, misuse, or unauthorised access. Staff return all company property on leaving employment.

Anti-bribery and conflicts of interest. Staff do not offer or accept bribes or improper inducements, and disclose any personal interest that could conflict with their duties to the company.

9 Health and Safety

Commitment. Pai Dai is committed to providing a safe, healthy working environment for all staff in Bangkok. Our operations comply with the Thai Occupational Safety, Health and Environment Act B.E. 2554.

Designated contact. The designated Health and Safety contact for the Bangkok office is Wanwisa Puengsawang (CEO). She is the first point of contact for any health-and-safety concern, incident, or near-miss.

First aid. Pai Dai's policy is to maintain a basic first-aid kit, accessible to all staff, at the Bangkok office. Staff are made aware of its location at induction. The designated contact ensures the kit is stocked and not expired.

Incident reporting. Any workplace injury, illness, or near-miss must be reported immediately to the designated contact and recorded in writing. Records are kept on file and reviewed at least annually.

Office environment. Pai Dai takes reasonable steps to maintain safe, ergonomically appropriate workstations, clear emergency exit routes, adequate ventilation and lighting, and fire-safety awareness for all staff. Health-and-safety conditions are assessed at least annually by the Sustainability Coordinator.

Staff training. All new staff receive a health-and-safety induction when they join, covering the location of first-aid equipment, the identity of the designated contact, fire-evacuation procedures, and the incident-reporting process. This briefing is given by the Sustainability Coordinator or the designated contact; a record of each induction will be kept in the health-and-safety training log being established for the Bangkok office under the Travelife action plan (target 31-12-2026). Once in place, the log will record who was trained, on what, and when.

10 Grievance Procedure

Pai Dai is committed to providing every employee with a clear, confidential, and accessible process for raising workplace concerns or complaints.

How to raise a grievance. Any employee may raise a grievance verbally or in writing, directly with the CEO, Wanwisa Puengsawang (sally@paidaidmc.com). Concerns may relate to any aspect of employment: working conditions, treatment by a colleague or manager, a contractual matter, or any perceived breach of this policy.

Escalation for complaints about the CEO. Where the grievance relates to the conduct or decisions of the CEO, the employee may raise it confidentially and in writing with the designated escalation contact, Ally (Sales Manager, ally@paidaitravel.com, +66 81 072 0255), who provides an independent route for any concern that cannot be addressed by the CEO directly. Where the matter warrants it, Pai Dai will appoint an impartial external party to handle the complaint.

Response times. Pai Dai acknowledges receipt of every grievance within 2 working days. A substantive response, including the outcome of any investigation and the proposed resolution, is provided within 10 working days. Where more complex investigation is required, the employee is kept informed of the expected timeline.

Confidentiality and no retaliation. Grievances are handled confidentially. No employee will face any form of retaliation, disadvantage, or detriment for raising a genuine concern in good faith under this procedure. Retaliation against a person who raises a grievance is itself a disciplinary matter.

Record keeping. All grievances, investigations, and resolutions are documented and kept on file by the Sustainability Coordinator.

11 Disciplinary Procedure

Pai Dai is committed to handling any performance or conduct concerns fairly, consistently, and transparently. The following procedure applies to all staff.

1. **Informal discussion.** In the first instance, the CEO or the relevant line contact raises the concern informally with the employee in a private conversation, clearly describing the issue and the improvement required, and allowing the employee to respond.
2. **Written warning.** If the concern is not resolved, or in cases of more serious conduct, the employee receives a formal written warning setting out the nature of the concern, the required improvement, a reasonable timeline, and the consequence of no improvement.
3. **Escalation.** If no improvement is made after a written warning, or in cases of gross misconduct, the matter is escalated by the CEO for further action, which may include termination of employment in accordance with the Thai Labour Protection Act B.E. 2541, complying with the applicable notice and severance provisions.
4. **Right to appeal.** At every stage, the employee has the right to respond, to provide their own account of events, and to appeal against any formal decision. Appeals are directed to the CEO, or, where the CEO initiated the process, to the independent route described in Section 10.

The company will not take disciplinary action for any protected activity, including union membership, raising a grievance in good faith, or exercising a statutory right.

12 Training and Development

Pai Dai provides staff with access to role-relevant training and development, with equal access for all team members. Current training includes Travelife sustainability training (completed by CEO Wanwisa Puengsawang, with knowledge disseminated to all staff through operational briefings), child-protection awareness training (ECPAT / The Code, completed), a health-and-safety induction for all new joiners, and ongoing operational and product knowledge through peer learning and supplier familiarisations. A structured training plan is being developed and formalised through the annual Travelife action-plan review; participation will be recorded in a training log to be maintained by the Sustainability Coordinator (being established under the action plan, target 31-12-2026).

13 Governance

Sustainability Coordinator. Wanwisa Puengsawang (CEO) is responsible for this policy, for its implementation across the Bangkok office, and for the annual review.

Scope. This policy applies to all employees of Paidai Online Co., Ltd. in Thailand, regardless of contract type, role, or seniority.

Action items. Specific, time-bound actions arising from this policy are recorded in the Travelife sustainability action plan and reviewed as part of the annual reporting cycle.

14 Communication, Accessibility, and Revision

This policy will be published in English and Thai on paidaidmc.com alongside our Sustainability Policy (scheduled with the next website policies update); it is included in the staff induction materials and reaffirmed annually through our team communication channels, is available to all staff on request at any time, and is provided to wholesale partners, clients, and auditors on request. It is reviewed at least annually, aligned with the Travelife reporting cycle, and supersedes all previous versions. Material changes are communicated to all staff within 30 days of approval.

APPROVAL

This HR and Labour Policy is adopted and endorsed by the Executive Board of Pai Dai DMC (Paidai Online Co., Ltd.).



Wanwisa Puengsawang (Sally)

Chief Executive Officer & Sustainability Coordinator

15 September 2026

Date